Final Environmental Impact Report (Final EIR)

[State Clearinghouse No. 2008121080]

for

Los Angeles International Airport (LAX)
Bradley West Project

(formerly Los Angeles International Airport [LAX] Tom Bradley International Terminal [TBIT] Reconfiguration Project)

Volume 8

Responses to Comments and Corrections and Additions to the Draft EIR

Final Environmental Impact Report

This document (Volume 8) comprises the second and final part of the Environmental Impact Report for the Bradley West Project and supplements the Draft EIR for the Bradley West Project (consisting of Volumes 1 through 7), previously circulated for public review and comment. The Bradley West Project EIR is available for review at Los Angeles World Airports (LAWA), 7301 World Way West, 3rd Floor, Los Angeles, CA 90045.

City of Los Angeles

Los Angeles City File No. AD 043-08

September 2009

BRADLEY WEST PROJECT

Final Environmental Impact Report (Final EIR)

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City of Los Angeles
Los Angeles City File No. AD 043-08

September 2009

Los Angeles World Airports (LAWA) has prepared this project-level final environmental impact report (Final EIR) for the Bradley West Project pursuant to the California Environmental Quality Act (CEQA). The Bradley West Project is a project component of the LAX Master Plan Program approved by the Los Angeles City Council in December of 2004. The LAX Master Plan was the subject of a certified program-level environmental impact report (LAX Master Plan Final EIR) and an approved environmental impact statement (LAX Master Plan Final EIS), which were prepared by LAWA and the Federal Aviation Administration, respectively.

The Bradley West Project Final EIR is "tiered" from, and incorporates by reference, the LAX Master Plan Final EIR. This means that this Final EIR builds on the work contained in the LAX Master Plan Final EIR, and provides additional project-level information and analysis as necessary for public agencies, decision makers, and interested parties to evaluate the Bradley West Project under CEQA. CEQA encourages public agencies to tier environmental analyses for individual projects from program-level environmental impact reports to eliminate repetitive discussions and to focus later EIRs (such as this Final EIR) on issues that may have not been fully addressed at a project-level of detail.

The LAX Master Plan Final EIR dealt with many of the specific issues associated with the individual projects encompassed within the Master Plan, such as the improvements currently proposed for the Bradley West Project. This "tiered" Final EIR supplements the information and analysis provided in the LAX Master Plan EIR with further detailed information and analysis at the project level, and it focuses on those effects not previously considered in the Master Plan EIR. For this reason, much of the information related to the Bradley West Project improvements contained in the LAX Master Plan EIR is not repeated in this Final EIR. However, a brief summary of each of the areas covered in the LAX Master Plan Final EIR has been provided in this project-level Final EIR, along with the location where the reader can locate the prior treatment of those areas.

This Final EIR is prepared in accordance with all requirements of CEQA. This Final EIR incorporates and responds to comments received on the Notice of Preparation for the EIR and on the Draft EIR and includes corrections and additions to the Draft EIR. LAWA, the Los Angeles Board of Airport Commissioners, and other decision-makers will use this Final EIR to inform their decisions on the Bradley West Project, as CEQA requires. Volumes 1 through 7 of the Final EIR consist of the Draft EIR and the associated appendices, and Volume 8 of the Final EIR includes a list of the persons, organizations and agencies commenting on the Draft EIR, written responses to comments received on the Draft EIR, corrections and additions made to the Draft EIR, and a copy of comment letters received.

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List of Attachments

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PREFACE

This document, in conjunction with the previously prepared documents described below, constitutes the Final Environmental Impact Report (Final EIR) for the Bradley West Project proposed at Los Angeles International Airport (LAX). As further described in the Introduction to this document, the Bradley West Project includes: construction of new north and south concourses at the Tom Bradley International Terminal (TBIT) just west of the existing concourses, which would be demolished; construction of nine aircraft gates, and associated loading bridges and apron areas, along the west side of the new concourses at TBIT; relocation and consolidation of existing aircraft gates along the east side of TBIT; renovation, improvement, and enlargement of the existing U.S. Customs and Border Protection (CBP) areas within the central core of TBIT; renovation, improvement, and enlargement of existing concessions areas, office areas, and operations areas within the central core of TBIT; construction of secure/sterile passenger connector corridors (i.e., areas allowing only passengers that have gone through security clearance and are subject to FAA or airline security requirements) between Terminals 3 and 4 and TBIT; and westward relocation of existing Taxiways S and Q, which are currently located in the area proposed for the new concourses and/or gates. In accordance with the California Environmental Quality Act (CEQA), the City of Los Angeles, as Lead Agency, completed an Environmental Impact Report (EIR) to address and disclose the potential environmental impacts associated with the proposed project. The City of Los Angeles circulated a Draft EIR regarding the Bradley West Project, received public and agency comments on the Draft EIR, and prepared written responses to those comments - all of which provides the basis for this Final EIR.

Pursuant to CEQA Guidelines §15132, a final EIR consists of:

(a) The draft EIR or a revision of the draft.

(b) Comments and recommendations received on the draft EIR either verbatim or in summary.

(c) A list of persons, organizations, and public agencies commenting on the draft EIR.

(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.

(e) Any other information added by the Lead Agency.

Accordingly, the Final EIR for the Bradley West Project consists of two components, as follows:

Component 1: Draft EIR and Technical Appendices

Volume 1 - Draft EIR: Volume 1 of the Final EIR includes the Draft EIR-Main Document, Chapters 1 through 3 and Sections 4.1 through 4.3 of Chapter 4, which was distributed for public review and comment from May 7, 2009 through June 22, 2009.

Volume 2 - Draft EIR: Volume 2 of the Final EIR includes the Draft EIR-Main Document, Sections 4.4 through 4.8 of Chapter 4 and Chapters 5 through 7, which was distributed for public review and comment from May 7, 2009 through June 22, 2009.

Volume 3 - Draft EIR Technical Appendices: Volume 3 of the Final EIR consists of technical appendices A through C-4 that were developed in conjunction with the Draft EIR.

Volume 4 - Draft EIR Technical Appendices: Volume 4 of the Final EIR consists of technical appendices C-5 through C-9 that were developed in conjunction with the Draft EIR.

Volume 5 - Draft EIR Technical Appendices: Volume 5 of the Final EIR consists of technical appendix D that was developed in conjunction with the Draft EIR.

Volume 6 - Draft EIR Technical Appendices: Volume 6 of the Final EIR consists of technical appendices E through F that were developed in conjunction with the Draft EIR.

Volume 7 - Draft EIR Technical Appendices: Volume 7 of the Final EIR consists of technical appendices G through J that were developed in conjunction with the Draft EIR.

Component 2: Responses to Comments and Corrections and Additions to the Draft EIR

Volume 8 - Responses to Comments and Corrections and Additions to the Draft EIR: The second part of the Final EIR consists of a compilation of the comments received on the Draft EIR, and the written responses prepared by the City to those comments. This document includes indices (i.e., lists) of agencies, organizations, and individuals that commented on the Draft EIR, and provides a copy of the comment letters in their original form (i.e., photocopies of comment letters). This document also describes other information, such as a delineation of corrections and additions to information presented in the Draft EIR, which has been added by the City as part of the Final EIR. The information presented herein constitutes the second component of the Final EIR.

All of the documents described above, comprising the Final EIR for the Bradley West Project, are available for public review at:

LAWA Administration Building
Airports and Facilities Planning Division
7301 World Way West, 3rd Floor
Los Angeles, CA 90045
Contact: Dennis Quilliam
(310) 646-7614 x1017

The Final EIR is also available at www.ourlax.org.

1. INTRODUCTION AND INDICES

1.1 Introduction

In compliance with the California Environmental Quality Act (CEQA), the City of Los Angeles has completed this Environmental Impact Report (EIR) for the Bradley West Project at Los Angeles International Airport (LAX). As described in the Preface of this document, the Final Environmental Impact Report (Final EIR) for the Bradley West Project consists of two components: Volumes 1 through 7 - Draft EIR and associated Technical Appendices for the Bradley West Project, and Volume 8 - Responses to Comments and Corrections and Additions to the Draft EIR. This document constitutes the second component of the Final EIR.

A detailed description of the Bradley West Project is provided in Volume 1 of the Final EIR (see Chapter 2 in the Draft EIR-Main Document). On May 7, 2009, the City of Los Angeles published a Draft EIR for the proposed Bradley West Project. In accordance with CEQA, the Draft EIR was circulated for public review for 45 days, with the review period closing on June 22, 2009. Two public meetings were held during the comment period: one on June 3, 2009 and the other on June 6, 2009.

As explained in more detail in Volume 1 of the Final EIR, the Bradley West Project is the third airport improvement project to be implemented pursuant to the previously approved LAX Master Plan. The LAX Master Plan was approved based on a certified, final program level EIR. Consistent with the LAX Master Plan Final EIR, Los Angeles World Airports (LAWA), the City agency charged with operating and maintaining LAX, proposes to construct the Bradley West Project which includes: construction of new north and south concourses at the Tom Bradley International Terminal (TBIT) just west of the existing concourses, which would be demolished; construction of nine aircraft gates, and associated loading bridges and apron areas, along the west side of the new concourses at TBIT; relocation and consolidation of existing aircraft gates along the east side of TBIT; renovation, improvement, and enlargement of the existing U.S. Customs and Border Protection (CBP) areas within the central core of TBIT; renovation, improvement, and enlargement of existing concessions areas, office areas, and operations areas within the central core of TBIT; construction of secure/sterile passenger connector corridors (i.e., areas allowing only passengers that have gone through security clearance and are subject to FAA or airline security requirements) between Terminals 3 and 4 and TBIT; and westward relocation of existing Taxiways S and Q, which are currently located in the area proposed for the new concourses and/or gates. Construction of the relocated taxiways would require the relocation and/or removal of several existing airfield facilities, including the existing busing operations holdroom at TBIT, various utilities, the existing loading dock at TBIT, seven remain-overnight (RON) aircraft parking spots, ground service equipment (GSE) storage and maintenance facilities, two ground vehicle fueling stations, an airfield operations area (AOA) access control post, all or a part of the aircraft maintenance hangar formerly owned and operated by TWA, the American Airlines Low-Bay Hangar, one or more of the three water deluge tanks located south of the American Airlines Low-Bay Hangar, a flight kitchen, the Los Angeles Fire Department Station 80/Aircraft Rescue and Firefighting (ARFF) Facility, a vehicle parking lot, the American Eagle Commuter Terminal building, and a fuel vault.

The LAX Master Plan was approved based on a certified program EIR, the LAX Master Plan EIR. A program EIR, under CEQA Guidelines §15168, is an EIR prepared for a program or plan-level document that analyzes the potential impacts of the program or plan and implementing activities as they are known at the time the program or plan is approved. Projects implementing the plan or program must be analyzed under CEQA to the extent they are outside the scope of the program covered by the program EIR. To the extent such projects are within the scope of the program covered by the program EIR, no new environmental analysis is required. The Bradley West Project is such a project. Accordingly, the Bradley West Project EIR is a "project" or "tiered" EIR based upon the LAX Master Plan EIR. Thus, the focus of its analysis is project-specific attributes, information or circumstances not known or present at the time of, and therefore not analyzed in, the LAX Master Plan EIR. Information and analysis presented in the LAX Master Plan EIR is incorporated by reference in the Bradley West Project EIR to deal with

regional influences, secondary effects, cumulative impacts, broad alternatives, and other factors that apply to the program as a whole.

In accordance with CEQA Guidelines §15088, the City of Los Angeles prepared responses to all comments received on the Draft EIR. As required by the CEQA Guidelines, the focus of the responses to comments is on "the disposition of significant environmental issues raised." Detailed responses are not provided to comments on the merits of the proposed project or on other topics that do not relate to environmental issues.

This document, which is the second component of the Final EIR, presents the comments received during the public review period for the Draft EIR and provides written responses to those comments. A total of 20 comment letters were received during the public review period as well as a transcription of the public meeting held on June 6, 2009.[1] The indices presented at the end of this chapter list the agencies, organizations, and individuals that submitted comments on the Draft EIR. Copies of all comment letters received are provided in Attachment 1 of this document. A total of 169 individual comments resulted from such input. Chapter 2 of this document presents individual responses prepared by the City of Los Angeles relative to comments received during the review period for the Draft EIR (May 7, 2009 to June 22, 2009). Chapter 3 of this document provides corrections and additions to information presented in the Draft EIR.

The format for the responses to comments presents, on a letter-by-letter basis, each comment, which is then followed immediately by a response. The comments and responses are organized and grouped into categories based on the affiliation of the commentor. The comments are presented in the following order: federal agencies, state agencies, regional agencies, local agencies, and public comments (i.e., letters from private citizens, organizations, etc.).

An alphanumeric index system is used to identify each comment and response, and is keyed to each letter and the individual comments therein. For example, the first letter within the group of federal agencies submitting comments on the Draft EIR is from the United States Department of Homeland Security, and the text of the letter is considered to have one individual comment. The subject letter was assigned the alphanumeric label "BWP-AF00001," representing "Bradley West Project-Agency-Federal-Letter No. 1." The individual comment within the letter is labeled as BWP-AF00001-1. The same basic format and approach is used for the comment letters from state agencies ("AS"), local agencies ("AL"), public comments ("PC"), and the public hearing ("PH").

The following are the prefix codes used for categorizing the comment letter types:

Letter ID Prefix	Description
AF	Federal Agency
AS	State Agency
AL	Local Agency
PC	Public Comment
PH	Public Hearing

To assist the reader's review and use of the responses to comments, three indices are provided. These indices provide the alphanumeric label number, commentor name, affiliation (i.e., name of agency or organization that the author represents), and date (if provided) of each comment letter. The first index lists all of the comment letters by alphanumeric label number, the second index lists all of the comment letters by the commentor's last name, and the third index lists all of the comment letters by the affiliation, if any, of the commentor.

[1] No testimony was received at the public meeting held on June 3, 2009; hence, only the transcription of the public meeting held on June 6, 2009 is included in the Final EIR.

The responses to comments consist of both a topical response and individual responses. Within the individual comments submitted on the Bradley West Project Draft EIR, many issues were raised by multiple commentors, and many comments pertained to a general theme that was common to multiple commentors. To respond to these comments, a topical response was prepared that provides a single comprehensive discussion of the issue of concern. The topical response is provided at the beginning of Chapter 2 of this document.

Chapter 2 also provides individual comments and responses, presented on a letter-by-letter basis. Each comment is typed exactly as it appears in the original comment letter. No corrections to typographical errors or other edits to the original comments were made. A copy of each original comment letter is provided in Attachment 1 of this document.

Immediately following each typed comment is a written response developed by the City of Los Angeles. In many instances, the response to a particular comment may refer to the response(s) to another comment(s) that expressed the same concern or is otherwise related. Cross-referencing of responses uses the alphanumeric index system described above. For example, a response may indicate "Please see Response to Comment BWP-AL00001-2" if that response addresses the same concern expressed in a different comment.

Together with the Draft EIR, the responses to comments, along with corrections and additions to the Draft EIR, constitute the Final EIR. Pursuant to CEQA, the Final EIR is not circulated for another round of comments and responses. The Final EIR is presented to the decision-makers for their use in considering the project. Interested persons may comment on the Final EIR, including these responses, in the course of the decision-making process related to the Bradley West Project; however, the City is not required to provide responses to such comments.

1.2 Indices of Comment Letters

Following are three indices that organize the comment letters by letter identification number, commentor, and affiliation.

Index by Letter Identification (ID) Number

Letter ID	Commentor	Affiliation/Agency Department		Date
BWP-AF00001	Blackburn, Gregor	U.S. Department of Homeland Security	FEMA Region IX	5/26/2009
BWP-AS00001	Alvarez, Elmer	State of California	DOT/District 7	6/22/2009
BWP-AS00002	Roberts, Terry	State of California	Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	6/23/2009
BWP-AL00001	MacMillan, Jeannette M.	Shute, Mihaly & Weinberger, LLP (City of El Segundo)		6/22/2009
BWP-AL00001	Wolff, Osa L.	Shute, Mihaly & Weinberger, LLP (City of El Segundo)		6/22/2009
BWP-AL00002	Kim, Jay W.	City of Los Angeles	Department of Transportation	6/22/2009
BWP-AL00003	Lichman, Barbara E.	Chevalier, Allen & Lichman, LLP (City of Inglewood and Culver City)		6/23/2009
BWP-AL00004	Maier, Tricia	County of Ventura	Air Pollution Control District	6/22/2009
BWP-AL00005	Fujioka, William T.	County of Los Angeles	Chief Executive Office	6/25/2009
BWP-AL00006	Lorscheider, Brent	City of Los Angeles	Bureau of Sanitation, Wastewater Engineering Services Division	6/18/2009
BWP-PC00001	Skjerven, Mark	None Provided		6/6/2009
BWP-PC00002	Schneider, Nan	ARSAC		6/6/2009
BWP-PC00003	Aelony, Avram	None Provided		5/13/2009
BWP-PC00004	Brubaker, Pat	None Provided		5/14/2009
BWP-PC00005	Carlson, Ken	None Provided		5/17/2009

Index by Letter Identification (ID) Number

Letter ID	Commentor	Affiliation/Agency Department	Date
BWP-PC00005	Carlson, Carol	None Provided	5/17/2009
BWP-PC00006	Ponder, Beverly	None Provided	5/24/2009
BWP-PC00007	Coyne-Hoerle, Helen	None Provided	6/4/2009
BWP-PC00008	Dragone, John	Los Angeles International Airport Area Advisory Committee	6/16/2009
BWP-PC00009	Cope, Danna	None Provided	6/22/2009
BWP-PC00010	Roberts, William R.	Westchester Democratic Club	6/19/2009
BWP-PC00011	Schneider, Denny	ARSAC	6/21/2009
BWP-PH00001	Schneider, Nan	None Provided	6/6/2009
BWP-PH00002	Schneider, Denny	ARSAC	6/6/2009
BWP-PH00003	Ackerman, Robert	ARSAC	6/6/2009
BWP-PH00004	Quartzstrom, Dan	None Provided	6/6/2009
BWP-PH00005	Skjerven, Mark	None Provided	6/6/2009
BWP-PH00006	Cope, Danna	None Provided	6/6/2009

Index by Commentor

Commentor	Affiliation/Agency	Department	Date	Letter ID
Ackerman, Robert	ARSAC		6/6/2009	BWP-PH00003
Aelony, Avram	None Provided		5/13/2009	BWP-PC00003
Alvarez, Elmer	State of California	DOT/District 7	6/22/2009	BWP-AS00001
Blackburn, Gregor	U.S. Department of Homeland Security	FEMA Region IX	5/26/2009	BWP-AF00001
Brubaker, Pat	None Provided		5/14/2009	BWP-PC00004
Carlson, Carol	None Provided		5/17/2009	BWP-PC00005
Carlson, Ken	None Provided		5/17/2009	BWP-PC00005
Cope, Danna	None Provided		6/22/2009	BWP-PC00009
Cope, Danna	None Provided		6/6/2009	BWP-PH00006
Coyne-Hoerle, Helen	None Provided		6/4/2009	BWP-PC00007
Dragone, John	Los Angeles International Airport Area Advisory Committee		6/16/2009	BWP-PC00008
Fujioka, William T.	County of Los Angeles	Chief Executive Office	6/25/2009	BWP-AL00005
Kim, Jay W.	City of Los Angeles	Department of Transportation	6/22/2009	BWP-AL00002
Lichman, Barbara E.	Chevalier, Allen & Lichman, LLP (City of Inglewood and Culver City)		6/23/2009	BWP-AL00003
Lorscheider, Brent	City of Los Angeles	Bureau of Sanitation, Wastewater Engineering Services Division	6/18/2009	BWP-AL00006
MacMillan, Jeannette M.	Shute, Mihaly & Weinberger, LLP (City of El Segundo)		6/22/2009	BWP-AL00001

Index by Commentor

Commentor	Affiliation/Agency	Department	Date	Letter ID
Maier, Tricia	County of Ventura	Air Pollution Control District	6/22/2009	BWP-AL00004
Ponder, Beverly	None Provided		5/24/2009	BWP-PC00006
Quartzstrom, Dan	None Provided		6/6/2009	BWP-PH00004
Roberts, Terry	State of California	Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	6/23/2009	BWP-AS00002
Roberts, William R.	Westchester Democratic Club		6/19/2009	BWP-PC00010
Schneider, Denny	ARSAC		6/21/2009	BWP-PC00011
Schneider, Denny	ARSAC		6/6/2009	BWP-PH00002
Schneider, Nan	ARSAC		6/6/2009	BWP-PC00002
Schneider, Nan	None Provided		6/6/2009	BWP-PH00001
Skjerven, Mark	None Provided		6/6/2009	BWP-PC00001
Skjerven, Mark	None Provided		6/6/2009	BWP-PH00005
Wolff, Osa L.	Shute, Mihaly & Weinberger, LLP (City of El Segundo)		6/22/2009	BWP-AL00001

Index by Affiliation

Affiliation/Agency Department		Commentor Date		Letter ID
ARSAC		Schneider, Nan	6/6/2009	BWP-PC00002
ARSAC		Schneider, Denny	6/21/2009	BWP-PC00011
ARSAC		Schneider, Denny	6/6/2009	BWP-PH00002
ARSAC		Ackerman, Robert	6/6/2009	BWP-PH00003
Chevalier, Allen & Lichman, LLP (City of Inglewood and Culver City)		Lichman, Barbara E.	6/23/2009	BWP-AL00003
City of Los Angeles	Department of Transportation	Kim, Jay W.	6/22/2009	BWP-AL00002
City of Los Angeles	Bureau of Sanitation, Wastewater Engineering Services Division	Lorscheider, Brent	6/18/2009	BWP-AL00006
County of Los Angeles	Chief Executive Office	Fujioka, William T.	6/25/2009	BWP-AL00005
County of Ventura	Air Pollution Control District	Maier, Tricia	6/22/2009	BWP-AL00004
Los Angeles International Airport Area Advisory Committee		Dragone, John	6/16/2009	BWP-PC00008
None Provided		Skjerven, Mark	6/6/2009	BWP-PC00001
None Provided		Aelony, Avram	5/13/2009	BWP-PC00003
None Provided		Brubaker, Pat	5/14/2009	BWP-PC00004
None Provided		Carlson, Ken	5/17/2009	BWP-PC00005
None Provided		Carlson, Carol	5/17/2009	BWP-PC00005
None Provided		Ponder, Beverly	5/24/2009	BWP-PC00006
None Provided		Coyne-Hoerle, Helen	6/4/2009	BWP-PC00007

Index by Affiliation

Affiliation/Agency Department		Commentor Date		Letter ID
None Provided		Cope, Danna	6/22/2009	BWP-PC00009
None Provided		Schneider, Nan	6/6/2009	BWP-PH00001
None Provided		Quartzstrom, Dan	6/6/2009	BWP-PH00004
None Provided		Skjerven, Mark	6/6/2009	BWP-PH00005
None Provided		Cope, Danna	6/6/2009	BWP-PH00006
Shute, Mihaly & Weinberger, LLP (City of El Segundo)		MacMillan, Jeannette M.	6/22/2009	BWP-AL00001
Shute, Mihaly & Weinberger, LLP (City of El Segundo)		Wolff, Osa L.	6/22/2009	BWP-AL00001
State of California	DOT/District 7	Alvarez, Elmer	6/22/2009	BWP-AS00001
State of California	Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	Roberts, Terry	6/23/2009	BWP-AS00002
U.S. Department of Homeland Security	FEMA Region IX	Blackburn, Gregor	5/26/2009	BWP-AF00001
Westchester Democratic Club		Roberts, William R.	6/19/2009	BWP-PC00010

2. COMMENTS AND RESPONSES

The following provides the Topical Response and individual responses to comments on the Bradley West Project Draft EIR.

2.1 Topical Response

TR-BWP-ST-1 Use of West Construction Staging Area for Primary Construction Parking

A number of comments were submitted on the Notice of Preparation (NOP) for the Bradley West Project Draft EIR expressing concerns about, and opposition to, the proposed use of the Northwest Construction Staging/Parking Area, the East Contractor Employee Parking Area, or the Southeast Construction Staging/Parking Area as the primary parking area for project construction workers. In response to those comments, the Bradley West Project Draft EIR includes Alternative 4: Construction Staging/Parking Areas-Optimize Use of West Construction Staging Area to Include Worker Parking as an option to serve as the primary construction worker parking area. Numerous comments were received on the Bradley West Project Draft EIR expressing continued opposition to project-related construction worker parking occurring within the aforementioned areas at the northwest, southeast, and east ends of the airport. Several of those comments indicated support for the potential option of putting worker parking in the West Construction Staging Area as envisioned under Alternative 4. In light of those comments, LAWA conducted further evaluation of the design and operational characteristics of Alternative 4, which is summarized below. The discussion below refines the description of Alternative 4 provided in Section 6.4.2.4 on page 6-10 of the Bradley West Project Draft EIR.

Alternative 4, described in Section 6.4.2.4 of the Bradley West Project Draft EIR, calls for the reconfiguration of the West Construction Staging Area to provide space for contractor employee parking while also supporting the original intent for the area to accommodate construction staging. As part of the Final EIR for the Bradley West Project, the layout for Alternative 4 has been further evaluated and refined to provide employee parking near the start of construction and to remain available for use through the duration of construction. Particular attention was given to the space assignments for individual contractors, including those that would be required for the Bradley West Project and those required for the Crossfield Taxiway Project (CFTP). Also, the delineation of internal access routes and vehicle access gates and the location of vehicle entry/exit points at adjacent public roads were further evaluated.

The Bradley West Project contractor employee parking area envisioned under Alternative 4 in the Draft EIR would be located in the northwest portion of the West Construction Staging Area. The parcel located immediately to the north, between the subject parking area and World Way West, has been assigned to, and is currently being used by, the prime contractor for the CFTP. That area is secured from public access by a perimeter fence and controlled access gate. The location and orientation of the CFTP construction staging area relative to World Way West and the Bradley West Project contractor employee parking area under Alternative 4 are such that access between the parking area and World Way West would require the establishment of a separate controlled access gate and route through the CFTP staging area. The development and operation of such a facility would substantially reduce the area available for CFTP construction staging and laydown. Additionally, the time and logistics required to clear arriving vehicles through the new access gate could result in the queuing of vehicles back onto World Way West during the morning peak hour.

To avoid these space constraints and potential congestion, Alternative 4 has been refined to establish the parking area in the southern end of the West Construction Staging Area and develop a southern access route to the proposed parking area. Such a route would extend from an existing driveway located on the east side of Pershing Drive approximately 1,900 feet south of World Way West. This driveway serves an existing parking lot that is largely unused, with the exception of parking and storage of Federal Express (FedEx) trailers that have been temporarily displaced by current construction activities at the I-105 Sepulveda Boulevard Off-Ramp Improvement Project. It is anticipated that this temporary parking and

storage of trailers could be consolidated into a smaller portion of the lot, or may no longer be needed, by the time West Construction Staging Area improvements occur. The subject driveway provides direct northbound access onto Pershing Drive and southbound access onto Pershing Drive via an unsignalized opening in the existing raised median. Under Alternative 4, as refined, that driveway would be widened to provide adequate space for ingress and egress and the median within Pershing Drive would be modified to create a left-turn pocket for southbound vehicles to turn east into the driveway. In addition, LAWA is evaluating the feasibility of improving the intersection as a signalized "T" intersection with Pershing Drive. Signalizing the intersection would enhance safety for traffic turning left into or out of the driveway. If a signal were implemented, the activation of signalized turn movements for left turns into and out of the driveway would be vehicle-dependent (i.e., the interruption of through traffic on Pershing Drive would only occur when vehicles turning left are present at the newly signalized intersection). In the event a signal is not implemented or is not in place at the outset of project construction, LAWA would implement, as appropriate, other means of traffic control, which could include, but not be limited to, the use of flagmen, temporary electronic signs warning motorists on Pershing Drive of cross traffic, or restrictions on traffic movements in and out of the West Construction Staging/Parking Area driveway. From the widened driveway location, a new construction access road would connect with the proposed contractor employee parking area. Construction of this road could begin immediately after approval of the Bradley West Project (i.e., would not be affected by the operation of the CFTP construction staging area) and, along with completion of the proposed parking area, would be available for use by Bradley West Project contractor employees soon after start of construction. Under Alternative 4, as refined, the initial parking needs of Bradley West Project contractor employees, occurring while the West Contractor Staging Area parking lot and access road are being constructed, would be met through use of the existing East Contractor Employee Parking Area located on La Cienega Boulevard, as shown in Figure 2-9 in the Bradley West Project Draft EIR. While the parking in the West Construction Staging Area is being developed, the only employee parking that would occur at the Northwest Construction Staging/Parking Area would be that associated with use of construction trailers/offices situated therein, and no contractor employee parking would occur in the Southeast Construction Staging/Parking Area.

Once the new parking area and access road become operational, which is currently anticipated to occur within approximately 8 weeks after commencement of construction, the West Contractor Staging Area would serve as the primary parking area for Bradley West Project contractor employees throughout project construction. As described in Section 4.3 of the Bradley West Project Draft EIR, it is estimated that 691 peak day employees requiring 601 parking spaces would occur during the peak construction quarter (Fourth Quarter 2011). It should be noted that the peak day estimate includes two shifts, with 481 vehicles in the daytime shift and 120 vehicles in the evening shift, which means that the parking demands would typically be much less than 601, even during the peak construction quarter, except for short periods of overlap between work shifts. Alternative 4 would, nevertheless, provide for 624 contractor employee parking spaces, which would meet the peak non-surge parking demand and, during peak non-surge times, would not require the use of any of the other contractor employee parking areas identified in the Bradley West Project Draft EIR (i.e., the Northwest Construction Staging/Parking Area, the Southeast Construction Staging/Parking Area, or the East Contractor Employee Parking Area). In the event there is a surge in construction activities that generates more than the 601 peak day vehicles described above, and the difference cannot be accommodated within the 624-space parking lot in the West Construction Staging Area, the excess parking demands would be accommodated at the East Contractor Employee Parking Area. Should the East Contractor Employee Parking Area not be available, the Southeast Construction Staging/Parking Area would accommodate excess parking demand. LAWA is also investigating the possibility of using the on-airport area currently occupied by the American Airlines Low Bay Hangar for construction staging or parking, once the existing structure is removed in conjunction with the construction of Taxiway T that is proposed as part of the Bradley West Project. This area may be available for construction-related uses for several months before construction of Taxiway T. Should that occur, it may be possible to use some of the area for overflow parking during a construction surge, thereby reducing or avoiding the need to use the East Contractor Employee Parking Area or the Southeast Construction Staging/Parking Area for construction surge parking.

In light of these refinements to Alternative 4, traffic modeling was conducted to quantitatively assess impacts to nearby intersections from the use of the West Construction Staging Area as the primary parking location for Bradley West Project contractor employees, as would be facilitated through the development of a south access road and an improved, possibly signalized, intersection on Pershing Drive. The results of that traffic analysis are presented below.

Analysis Background - The Bradley West Project Draft EIR assesses the potential construction-related traffic impacts associated with the use of one, or various combinations of three, construction vehicle staging and employee parking locations. The potential impacts were assessed for four scenarios that reflect alternative traffic demand and trip distribution assumptions associated with the use of these staging/parking areas. The staging/parking locations studied in the Bradley West Project Draft EIR included the Northwest Construction Staging/Parking Area, the East Contractor Employee Parking Area, and the Southeast Construction Staging/Parking Area. These facilities are depicted in Figure 4.3-6 in the Draft EIR, as updated in Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR. The West Construction Staging Area (depicted as Location F in Figure 4.3-6) was considered as a potential alternative (i.e., Alternative 4 in the Bradley West Project Draft EIR) for the use of the Northwest Construction Staging/Parking Area that was analyzed as part of the Scenario 1 and Scenario 3 traffic conditions described in Section 4.3.4.2 of the Bradley West Project Draft EIR. This alternative was considered because the regional flow paths used by vehicles to access this location would be similar to those of the Northwest Construction Staging/Parking Area. Therefore, it was anticipated that the estimated impacts within the study area associated with use of the West Construction Staging Area for construction employee parking would be similar to those of the Northwest Construction Staging/Parking Area, with the exception of traffic flow through the intersection of Pershing Drive and Westchester Parkway, which is located between these two staging/parking areas. Furthermore, the impact analysis within the Bradley West Project Draft EIR was based on the assumption that access to the West Construction Staging Area would be provided via World Way West. However, as described above, Alternative 4, as refined, would include access to a contractor employee parking area via an at-grade driveway on Pershing Drive, with a median-cut provided to allow access to/from the southbound direction of Pershing Drive. Because this condition was not assumed in the Bradley West Project Draft EIR, additional analysis was conducted to assess whether the installation of the new intersection to serve an employee parking and construction delivery staging area located at the West Construction Staging Area would produce additional impacts associated with construction-related traffic. For the purpose of this analysis, traffic conditions were based on the worst-case condition analyzed for the Bradley West Project Draft EIR, defined as Scenario 3. This scenario assumed a temporary 60 percent surge in construction employee activity with an estimated 601 daily construction employees using the West Construction Staging area and 357 daily employees using the Southeast Construction Staging/Parking Area.

Analysis Assumptions - The intersections evaluated as part of the Bradley West Project construction surface transportation analysis are depicted in Figure 4.3-2 of the Bradley West Project EIR. The anticipated routes used by construction-related vehicles (employee vehicles, employee shuttles, and construction delivery trucks) were reviewed to identify the intersections that would be uniquely impacted as a result of traffic shifting from the Northwest Construction Parking/Staging Area to West Construction Staging Area.

The following intersections were identified as having the potential to be impacted and were evaluated based on the conditions described above:[2]

Intersection Number	Intersection Location
1001.[3]	Pershing Drive and West Construction Staging Area
68.	Imperial Highway and Main Street
69.	Imperial Highway and Pershing Drive
71.	Imperial Highway and Sepulveda Boulevard
123.	Westchester Parkway and Pershing Drive

The number of trips assumed for this modified scenario is consistent with Scenario 3, described and analyzed in the Bradley West Project Draft EIR (see calculation of trips within Table 4.3-7 of Bradley West Project Draft EIR). This modified Scenario 3 assumes a temporary 60 percent surge[4] in the number of employees and employee parking demand that is distributed between the West Construction Staging Area (63 percent) and the Southeast Construction Staging/Parking Area (37 percent). Specifically, the scenario assumes that 601 Bradley West Project construction employee vehicles would park at the West Construction Staging Area located at Pershing Drive during the peak day of construction. An additional 357 construction employee vehicles are assumed to park at the Southeast Construction Staging/Parking Area on a daily basis. A total of 22 shuttle bus trips would be required to transport employees between the employee parking facilities and the construction site during the construction peak hour. A total of 5 delivery trucks would be required to transport materials and equipment to/from the staging area during the construction peak hour. Equipment and material transfer trucks would utilize the airfield roadway system rather than the public roadway system to transfer goods between the construction staging area and the construction site and, as a result, would not have an effect on off-airport roadway traffic operations.

While the assumed numbers of trips are consistent with Scenario 3 of the Bradley West Project Draft EIR, the construction employee traffic flows are slightly modified to account for likely changes to employee travel behavior when accessing the construction employee parking at the West Construction Staging Area. Specifically, under Scenario 3 of the Bradley West Project Draft EIR, it was assumed that traffic originating or terminating from Sepulveda Boulevard south of the airport (approximately five percent of total traffic entering the study area) would use Westchester Parkway to access the Northwest Construction Staging/Parking Area. With construction employee parking assumed to be located at the West Construction Staging Area, northbound traffic from Sepulveda Boulevard was assumed to use Imperial Highway and Pershing Drive to access the employee parking area.

Analysis Results - Potential traffic-related impacts associated with the construction of the Bradley West Project were assessed for both project and cumulative impacts. **Table 1** sets forth the results of Impact Comparison 1, which provides a comparison of project-specific traffic activity during the peak Bradley West Project (fourth quarter 2011) added to the Baseline (2008) traffic volumes. As shown in the table, no project-related significant impacts would occur at the potential new intersection of Pershing Drive and the West Construction Staging Area (Intersection #1001). No significant impact would occur at the

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2 Only intersections generally south and west of the airport would be affected by changes in traffic volumes under Alternative 4 compared to the proposed project. This is because under the project analysis in the Draft EIR, the construction traffic that was originating from Sepulveda Boulevard south of the airport (5 percent of the employee trips) was assumed to travel through the Sepulveda Tunnel and turn left on Lincoln Boulevard/Westchester Parkway to access the Northwest Construction Staging/Parking Area. This route was adjusted for Alternative 4 when the West Construction Staging Area was assumed to include worker parking, such that this traffic would use Imperial Highway and Pershing Drive to access the site. This change affected traffic volumes at Intersections #123, #68, and #69. The other routes were not changed and, therefore, intersections such as Intersections #36 and #114, which are significantly impacted under the project scenario, would not experience notable changes in traffic volumes compared to the project analysis.

3 The intersection of Pershing Drive and the West Construction Staging Area is not included in the August 2008 intersection traffic count database that has been collected to support analyses associated with the LAX Specific Plan Amendment Study.

4 As described in Draft EIR Section 4.3.8.2, cumulative impacts were evaluated for the most critical "surged" conditions that would occur at the peak of the Bradley West Project construction (Fourth Quarter 2011) combined with the peak cumulative condition that would occur in the Fourth Quarter of 2010.

Imperial Highway and Sepulveda Boulevard intersection (#71) or at the Westchester Parkway and Pershing Drive intersection (#123). Consistent with the results of Scenario 3 (surge conditions) of the Bradley West Project Draft EIR, significant project-related impacts would occur at both Intersection #68 (during the construction p.m. peak hour) and Intersection #69 (during the construction a.m. peak hour).

Table 2 provides the results of Impact Comparison 2. Cumulative impacts were analyzed using a two-step process. The cumulative "With Project" level of service (LOS) condition was compared with the Baseline (2008) condition to determine if a cumulative impact would occur relative to the Baseline. If a cumulative impact was identified, then a second comparison was conducted by calculating the difference in LOS for the "With Project" and "Without Project" levels of service to determine the proposed project's contribution. As shown in the table, no significant cumulative impacts would occur at the potential new intersection of Pershing Drive and the West Construction Staging Area (Intersection #1001), nor would a significant cumulative impact occur at Westchester Parkway and Pershing Drive (#123). Although a cumulative impact is projected to occur at the intersection of Imperial Highway and Sepulveda Boulevard (#71), the project's contribution to that traffic would not exceed the significance threshold that defines a cumulatively considerable impact (see Section 4.3.6 of the Bradley West Project Draft EIR). Consistent with the results of Scenario 3 of the Bradley West Project Draft EIR, significant cumulative impacts would occur at both Intersection #68 (during construction p.m. peak hour) and Intersection #69 (during construction a.m. peak hour).

In summary, implementation of an improved intersection serving an entrance to the West Construction Staging area would not result in a significant impact at the new intersection during the construction-related a.m. and p.m. peak hours. Furthermore, given that LAX Master Plan Commitments ST-12 and ST-14 described in Section 4.3.7 of the Bradley West Project Draft EIR would restrict construction deliveries and employee shifts from coinciding with the commuter peak hours, traffic volumes entering and exiting the West Construction Staging Area would be negligible during the a.m. and p.m. commuter peak hours. If signalized, the intersection would operate such that the northbound and southbound directions of Pershing Drive would maintain a relatively constant free-flow signal condition during these times, which will ensure that the intersection would operate at a high level of service during the a.m. and p.m. commuter peak hours.

The use of the West Construction Staging Area for the Bradley West Project as an alternative to the Northwest Construction Staging/Parking Area would result in the same significant construction traffic-related impacts that were identified in the Bradley West Project Draft EIR. Specifically, the intersection of Imperial Highway and Main Street (#68) and the intersection of Imperial Highway and Pershing Drive (#69) would be significantly impacted. The Bradley West Project Draft EIR identified a mitigation program that would mitigate significant construction-related impacts at these two intersections. These potential mitigation measures are described in detail within Section 4.3.9 of the Bradley West Project Draft EIR. **Table 3** summarizes the final level-of-service for these two mitigated intersections, based on the anticipated traffic activity for the Scenario 3 conditions described above. As shown in the table, the proposed mitigation measures defined in the Bradley West Project Draft EIR would mitigate, to a less-than-significant level, the impacts associated with construction employee parking and staging occurring at the West Construction Staging lot rather than at the Northwest Construction Staging/Parking Area.

Table 1

Level of Service Analysis Results - Impact Comparison 1 Baseline (2008) Compared to Project plus Baseline (2008); Scenario 3

	Intersec tion	Peak Hour[1]	Baseline (2008) V/C[2]	Baseline (2008) LOS[3]	Bradley West Project Plus Baseline (2008) V/C[2]	Bradley West Project Plus Baseline (2008) LOS[3]	Change in V/C	Significant Impact
1001.	Pershing Drive and West Staging Area	Construction AM	0.306	A	0.465	A	0.159	--[4]
		Construction PM	0.324	A	0.576	A	0.252	--
68.	Imperial Highway and Main Street	Construction AM	0.404	A	0.416	A	0.012	--
		Construction PM	0.716	C	0.841	D	0.125	Yes
69.	Imperial Highway and Pershing Drive	Construction AM	0.479	A	0.730	C	0.251	Yes
		Construction PM	0.426	A	0.563	A	0.137	--
71.	Imperial Highway and Sepulveda Boulevard	Construction AM	0.509	A	0.520	A	0.011	--
		Construction PM	1.185	F	1.188	F	0.003	--
123.	Westchester Parkway and Pershing Drive.	Construction AM	0.212	A	0.271	A	0.059	--
		Construction PM	0.255	A	0.344	A	0.089	--

[1] The hours of analysis include the construction a.m. peak (6:00 a.m. - 7:00 a.m.), and the construction p.m. peak (3:30 p.m. - 4:30 p.m.).
[2] Volume to capacity ratio. In accordance with LADOT procedures, an ATSAC benefit of 0.07 was applied at each intersection with the exception of Intersection #1001 which is assumed not to be a part of the ATSAC system.
[3] Level of Service range: A (excellent) to F (failure).
[4] -- Indicates "No Impact"

Source: Ricondo & Associates, Inc., using TRAFFIX, 2009.

Table 2

Level of Service Analysis Results - Impact Comparison 2 Cumulative Traffic (Scenario 3, Fourth Quarter 2010)

			Baseline (2008) [A] [		Bradley West Project Peak (Q4 2010) Without Project B]		With Project [C]		Cumulative Impact Determination [C]-[A]		Cumulatively Considerable Determination/Significant Impact [C]-[B]	
	Intersection	Peak Hour[1]	V/C[2]	LOS [3]	V/C[2]	LOS[3]	V/C[2]	LOS[3]	Change in V/C	Cumulative Impact?	Change in V/C	Cumulatively Considerable Contribution?
1001.	Pershing Drive and West Staging Area	Construction AM	0.306	A	0.336	A	0.495	A	0.189	--[4]	0.159	--[4]
		Construction PM	0.324	A	0.355	A	0.607	B	0.283	--	0.252	--
68.	Imperial Highway and Main Street	Construction AM	0.404	A	0.426	A	0.683	B	0.279	--	0.257	--
		Construction PM	0.716	C	0.801	D	0.926	E	0.210	Yes	0.125	Yes
69.	Imperial Highway and Pershing Drive	Construction AM	0.479	A	0.536	A	0.786	C	0.307	Yes	0.250	Yes
		Construction PM	0.426	A	0.464	A	0. 601	B	0.175	--	0.137	--
71.	Imperial Highway and Sepulveda Boulevard	Construction AM	0.509	A	0.533	A	0.544	A	0.035	--	0.011	--
		Construction PM	1.185	F	1.237	F	1.240	F	0.055	Yes	0.003	--
123.	Westchester Parkway and Pershing Drive.	Construction AM	0.212	A	0.228	A	0.287	A	0.075	--	0.059	--
		Construction PM	0.255	A	0.269	A	0.371	A	0.116	--	0.102	--

[1] The hours of analysis include the construction a.m. peak (6:00 a.m. - 7:00 a.m.) and the construction p.m. peak (3:30 p.m. - 4:30 p.m.).

[2] Volume to capacity ratio. In accordance with LADOT procedures, an ATSAC benefit of 0.07 was applied at each intersection with the exception of Intersection #1001 which is assumed not to be a part of the ATSAC system.

[3] Level of Service range: A (excellent) to F (failure).

[4] -- Indicates "No Impact"

Source: Ricondo & Associates, Inc., using TRAFFIX, 2009.

Table 3

Level of Service With Potential Intersection Improvements

Intersection Number	Peak Hour	Intersection	Improvements	Affected Scenario	2010 Without Project (Without Improvements) V/C [A]	2010 Without Project (Without Improvements) LOS	2010 With Project (Without Improvements) V/C	2010 With Project (Without Improvements) LOS	2010 With Project (With Improvements) V/C [B]	2010 With Project (With Improvements) LOS	Cumulatively Considerable Determination/Significant Impact: Change in V/C [B] - [A]	Cumulatively Considerable Determination/Significant Impact: Cumulatively Considerable Contribution?
#68	PM	Imperial and Main	Mitigation for this impact involves narrowing the median island on the east leg of the intersection for the addition of a second left-turn lane.	Scenario 3 trips at West Staging Area	0.801	D	0.926	E	0.749	C	-0.052	No
#69	AM	Imperial and Pershing	Mitigation for this impact involves widening Imperial to the north for the addition of a right-turn lane on the east leg of the intersection. Resulting lane configuration is WB - 1 LT, 2 TH, 2 RT.[1]	Scenario 3 trips at West Staging Area	0.536	A	0.786	C	0.425	A	-0.111	No

[1] WB = westbound, LT - left-turn lane, TH = through lane, RT = right-turn lane

Source: Ricondo & Associates, Inc., using TRAFFIX, 2009.

2.2 Comments and Individual Responses

BWP-AF00001 Blackburn, Gregor U.S. Department of Homeland Security, FEMA Region IX 5/26/2009

BWP-AF00001-1

Comment: This is in response to your request for comments on the Los Angeles City File No. AD-043-08 Draft Environmental Impact Report for the TBIT Reconfiguration Project, Also referred to as the Bradley West Project, at Los Angeles International Airport.

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the City (Community Number 060137) and County (Community Number 065043), Maps revised September 26, 2008. Please note that the City and County of Los Angeles are participants in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.

- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any development must not increase base flood elevation levels. The term development means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials. A hydrologic and hydraulic analysis must be performed prior to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.

- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/business/nfip/forms.shtm.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Los Angeles City floodplain manager can be reached by calling Mark Pestrella, Assistant Deputy Director, Department of Public Works, at (626) 458-5100. The Los Angeles County floodplain manager can be reached by calling George De La O, Floodplain Manager, Los Angeles County, Department of Public Works, at (626) 458-7155.

Response: As indicated on page 5-28 of the Bradley West Project Draft EIR, none of the project site is located within a floodplain, as mapped and identified under the National Flood Insurance Program of the Federal Emergency Management Agency.

BWP-AS00001 Alvarez, Elmer State of California, DOT/District 7 6/22/2009

BWP-AS00001-1

Comment: Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the Tom Bradley International Terminal Reconfiguration Project. Based on the information received, we have the following comments:

It is anticipated that project related traffic including ambient growth in national passenger activity at the Tom Bradley International Terminal by 2013 would result in significant impacts at the following intersections that would involve State Highways.

Imperial Highway and Sepulveda Boulevard (State Route 1)
Restripe the northbound approach to the Imperial Highway and Sepulveda Boulevard intersection to provide one left turn lane, three through lanes and two right turn lanes. Implementation of this mitigation measure would reduce the impact to a less than significant level While restriping the intersection as described above would mitigate this impact, an alternative would be to widen the east side of Sepulveda Boulevard south of Imperial Highway to provide one left turn lane, three through lanes and two right turn lanes on the northbound approach. The restriping is recommended rather than the widening. In either case, the proposed mitigation measures will need a Caltrans Encroachment Permit. A Caltrans Encroachment Permit application along with a traffic study and striping plans would be needed for Caltrans review and approval. Caltrans design standards will need to be observed regarding lane widths and roadway shoulders.

Response: The impacts identified by the commentor are consistent with the conclusions of the Bradley West Project Draft EIR and mitigation measure MM-ST (BWP)-6 discussed in Section 4.2.9. The restriping option is recommended as the appropriate mitigation rather than the widening option. LAWA will coordinate with Caltrans regarding the Caltrans Encroachment Permit application and associated traffic study and striping plans.

BWP-AS00001-2

Comment: La Cienega Boulevard and I-405 ramps north of Century Boulevard
Widen the southbound approach to the La Cienega Boulevard and I-405 ramps north of Century Boulevard intersection to provide two left turn lanes and two through lanes. Implementation of this mitigation measure would reduce the impact to a less than significant level. This mitigation measure will need a Caltrans Encroachment Permit. A Caltrans Encroachment Permit application along with a traffic study, ramp analysis and striping plans would be needed for Caltrans review and approval. Caltrans design standards will need to be observed regarding lane widths and ramp shoulders.

Response: The impacts identified by the commentor are consistent with the conclusions of the Bradley West Project Draft EIR. LAWA will coordinate with Caltrans regarding the Caltrans Encroachment Permit application and associated traffic study, ramp analysis, and striping plans.

BWP-AS00001-3

Comment: Lincoln Boulevard (State Route 1) and Venice Boulevard (State Route 187)
Improvements for this intersection are considered infeasible due to right-of-way constraints. This impact would be significant and unavoidable.

Lincoln Boulevard (State Route 1) and Washington Boulevard
Improvements for this intersection are considered infeasible due to right-of-way constraints. This impact would be significant and unavoidable.

Rosecrans Avenue and Sepulveda Boulevard
Improvements for this intersection is considered infeasible (State Route 1) due to right-of-way constraints. This impact would be significant and unavoidable.

Sepulveda Boulevard (State Route 1) and I-105 ramp north of Imperial Highway
Improvements for this intersection are considered infeasible due to right-of-way constraints. This impact would be significant and unavoidable.

Physical improvements to improvements to the Lincoln Boulevard and Venice Boulevard, Lincoln Boulevard and Washington Boulevard, Rosecrans Avenue and Sepulveda Boulevard, and the Sepulveda Boulevard and I-105 ramp north of Imperial Highway intersections are considered infeasible due to right-of-way constraints; impacts at these intersections would be significant and unavoidable. As noted in the CMP analysis, project traffic to mainline I-105 and I-405 freeways would be over 150 trips at various segments that currently (2008) operate deficiently or are projected to operate deficiently by 2013. This impact should be considered cumulative considerable, especially since other related projects within the airport are foreseeable.

Response: The impacts identified for Lincoln Boulevard and Venice Boulevard, Lincoln Boulevard and Washington Boulevard, Rosecrans Avenue and Sepulveda Boulevard, and the Sepulveda Boulevard and I-105 ramp north of Imperial Highway intersections by the commentor are consistent with the impacts as stated in Table 4.2-6 and on page 4-153 in Section 4.2 of the Bradley West Project Draft EIR. As described in the Bradley West Project Draft EIR, the methodology used to assess the impacts of the proposed project on the freeway system is consistent with the criteria established in the Los Angeles County Congestion Management Program (CMP).

As discussed in Bradley West Project Draft EIR Section 4.2.2 (pages 4-88 and 4-92) the methodology used in the off-airport surface transportation analysis is cumulative by its nature. The traffic volumes assumed for future (2013) conditions include traffic from projects that are reasonably foreseeable to occur by the time the Bradley West Project is completed. Section 3.3 of the Bradley West Project Draft EIR describes such projects, including other airport-related projects. The project does add more than 150 trips (screening criteria for performing a CMP freeway analysis) to segments of the I-405 and I-105 discussed under the "CMP Freeway Analysis" in Section 4.2.8.2 of the Bradley West Project Draft EIR. The project would not however, result in any significant or cumulatively considerable impacts on the freeway mainlines delineated in the comment using the guidelines established in the CMP, as indicated on page 4-156 of the Bradley West Project Draft EIR.

BWP-AS00001-4

Comment: LAX International Airport is a regional facility and future improvements and upgrades to it are expected to have regional impacts on nearby State facilities. The transportation impact analysis should have included the analysis of impacts associated with the overall master plan. We recommend the lead agency coordinate with Caltrans and prepare a comprehensive study that would determine deficiencies and improvements that would be doable. The airport could contribute on a fair share basis to those improvements. Especially, in view of the fact that the CMP debit and credit system has been suspended and therefore cumulative transportation impacts are not being mitigated.

Response: The 2004 LAX Master Plan Final EIR provided an analysis of the on- and off-airport surface transportation impacts associated with the overall LAX Master Plan, which was approved by the Los Angeles City Council in December 2004. Please see Bradley West Project Draft EIR Section 1.2, which describes the relationship to the LAX Master Plan Final EIR in greater detail. Included in the LAX Master Plan Final EIR is a mitigation plan to address significant impacts to the off-airport roadway system, including state facilities. The LAX Master Plan Mitigation Measures were not dependent upon implementation of the debit and credit system referenced in the comment.

As described on page 1-1 of the Bradley West Project Draft EIR, the Bradley West Project is a component of the overall LAX Master Plan. As further discussed in Section 1.2.3, the Draft EIR for the Bradley West Project "is 'tiered' from, and incorporates by reference, the LAX Master Plan Final EIR and focuses on those effects not previously considered in the Master Plan EIR" including transportation impacts. Specifically, transportation impacts are discussed in Sections 4.1, 4.2, and 4.3 of the Bradley West Project Draft EIR. These sections provide impact analysis associated with the Bradley West Project and other cumulative projects. The fact that the Los Angeles County Congestion Management Plan (CMP) debit and credit system has been suspended does not affect the analysis or mitigation of traffic impacts resulting from the Bradley West Project. The debit and credit system is not related to project level CEQA analysis but to jurisdictions as a whole, which, in past years have reported on transportation improvement strategies that manage and mitigate traffic congestion.1

The analysis in Sections 4.1, 4.2, and 4.3 does not rely on the CMP debit and credit system to mitigate significant impacts (see Bradley West Project Draft EIR Sections 4.2.8.2, 4.2.9, and 4.2.10). As discussed in Section 4.2.8.2, the CMP Arterial Intersection Analysis determined there would be two significantly impacted intersections (Intersections #93 and #125). The EIR considered potential mitigation for these intersections, as further discussed in Section 4.2.9 and 4.2.10, and determined that such mitigation was infeasible. Therefore, it appropriately identified the impacts as significant and unavoidable.

1. Los Angeles County Metropolitan Transportation Authority, 2002 Congestion Management Program for Los Angeles County, June 2002.

BWP-AS00001-5

Comment: We understand that physical improvements to mainline freeways might not be feasible to mitigate by the proposed terminal upgrade. We request that LAWA consult with Caltrans regarding fair-share contributions towards traffic mitigation improvements for State facilities or other mitigation alternatives to State highway facilities. Other mitigation alternatives may include fair-share contributions towards pre-established or future improvements on I-405 (NB HOV lane and new the SB Arbor Vitae interchange) and I-105 freeways and for State Route 1, Sepulveda Boulevard and Lincoln Boulevard.

Response: The Bradley West Project Draft EIR identified six significant impacts on state facilities of which two were "CMP Arterial Intersection" impacts. Of these six impacts, it was determined that feasible mitigation measures were available for the following two facilities:

- Imperial Highway and Sepulveda Boulevard (State Route 1)
- La Cienega Boulevard and I-405 ramps north of Century Boulevard

The mitigation measures for these two locations, Mitigation Measures MM-ST (BWP)-6 and MM-ST (BWP)-7, are described on page 4-164 in Section 4.2 of the Bradley West Project Draft EIR. These two mitigation measures would be fully funded by LAWA. Improvements that would be necessary to address significant impacts at the remaining four state facilities/intersections (Lincoln Boulevard and Venice Boulevard, Lincoln Boulevard and Washington Boulevard, Rosecrans Avenue and Sepulveda Boulevard, and Sepulveda Boulevard and I-105 ramp north of Imperial Highway) were determined to be infeasible, as described on pages 4-160 and 4-161 of the Bradley West Project Draft EIR.

Section 4.2 of the Bradley West Project Draft EIR also includes an analysis of potential "CMP Freeway" impacts of the Bradley West Project on the regional freeway system serving the project area. As indicated on page 4-156 of the Bradley West Project Draft EIR, the Bradley West Project would not result in a significant impact on the adjacent freeway segments during either the a.m. or p.m. peak hours. Thus, no mitigation measures are required.

With respect to fair share contributions for improvements/mitigation measures for State facilities, LAWA would be prepared to contribute its fair share if there was a legally adopted program which addressed the proposed project's significant impacts. To date, Caltrans has no such program for LAWA to contribute funds. (See Anderson First Coalition v. City of Anderson [2005] 130 Cal.App. 4th 1173 [the fee must be part of a reasonable plan of actual mitigation that the relevant agency commits itself to implementing], see also Carson Coalition for Healthy Families v. City of Carson [2007] 2007 WL 3408624 at page 18 [unpublished].) Should such a program be established in the future, LAWA's participation in the fair share contribution of funds is subject to federal requirements and FAA approval pertaining to the use of airport revenues.

BWP-AS00001-6

Comment: We recommend that construction related truck trips on State highways be limited to off-peak commute periods. The contractor should avoid platooning of trucks on mainline freeways, on freeway on/off-ramps, and at freeway ramp intersections. Transport of over-size or over-weight vehicles on State highways will need a Caltrans Transportation Permit.

Response: Consistent with the requirements set forth in LAX Master Plan Commitment ST-14, construction truck deliveries and construction employee shifts shall be scheduled by the Bradley West Project construction contractor to avoid the peak periods of 7:00 to 9:00 a.m. and 4:30 to 6:30 p.m.

As requested by Caltrans, the contractor would schedule truck deliveries and departures to and from the staging area to avoid excessive or poorly timed truck platooning that would otherwise result in a series of closely spaced construction delivery trucks using the local freeway system. This would be accomplished through the implementation of LAX Master Plan Commitments C-1, Establishment of a Ground Transportation/Construction Coordination Office, and ST-18, Construction Traffic Management Plan (refer to Section 4.3.7 on pages 4-210 and 4-211 of the Bradley West Project Draft EIR). LAWA, through its Ground Transportation Coordination Office, will periodically review and analyze traffic conditions on designated routes during construction to see whether there is a need to revise truck delivery times to improve traffic operations. The specifications for construction of the Bradley West Project will outline the environmental requirements that regulate Bradley West construction traffic, among other requirements. The specifications will require the contractor to submit within 30 days after Notice to Proceed, a Construction Traffic Management Plan (CTMP) that shall include a description of how the contractor will manage all construction related traffic. The requirement to schedule deliveries and departures from the staging area to avoid excessive platooning will be addressed as part of the CTMP.

The comment pertaining to the requirement for a Caltrans Transportation Permit for transport of over-size or over-weight vehicles is noted. The project specifications for construction of the Bradley West Project will outline the environmental requirements that regulate Bradley West Project construction traffic, among other requirements. The construction specifications will state that compliance with the environmental requirements contained within the specifications "does not exempt the Contractor from compliance with other applicable permits, approvals, requirements, rules and regulations of other agencies with jurisdiction over the work of this contract." Therefore, the contractor will be bound by the Caltrans permitting requirement.

BWP-AS00002 Roberts, Terry State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit 6/23/2009

BWP-AS00002-1

Comment: The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on June 22, 2009, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Response: The comment is noted. It should be noted that a comment letter from the State of California, Department of Transportation (Caltrans) was sent directly to LAWA and received before the close of the public comment period (June 22, 2009). Caltrans' comment letter is identified as BWP-AS00001.

BWP-AL00001 Wolff, Osa L. Shute, Mihaly & Weinberger LLP 6/22/2009

BWP-AL00001-1

Comment: We submit this letter on behalf of our client, the City of El Segundo, to comment on the Draft Environmental Impact Report ("DEIR") recently released by Los Angeles World Airports ("LAWA") for its Bradley West Project ("Project") at Los Angeles International Airport ("LAX"). The City of El Segundo has been an active participant in the LAX Master Plan process since its inception. In February of 2006, El Segundo, together with other petitioners, entered into a Stipulated Settlement Agreement with LAWA. El Segundo continues to monitor LAWA's efforts to implement the LAX Master Plan in order to ensure those efforts comply with the terms of the Master Plan and Stipulated Settlement. In keeping with that approach, and in the spirit of continued cooperation, we submit this comment letter on behalf of the City of El Segundo.

LAWA's Master Plan Implementation: To date, LAWA's principal efforts to implement the Master Plan have consisted of work on: (1) the South Airfield Improvement Program ("SAIP"), which is now complete; (2) the Crossfield Taxiway Project ("CFTP"), for which LAWA has released a final EIR; (3) the Bradley West Project addressed in the DEIR; and (4) the Specific Plan Advisory Study ("SPAS") process to identify replacements for "Yellow Light" Master Plan elements, for which progress has been exceedingly slow.

LAWA's first project, the SAIP, was clearly identified by the Master Plan as the first "Phase I" project. As such, it was appropriate for LAWA to begin its Master Plan implementation efforts with the SAIP. By contrast, although LAWA has now elected to proceed with the CFTP and Bradley West Project, those projects are not identified by the Master Plan as "Phase I" projects. In fact, the Crossfield Taxiway and Bradley West Projects are identified as occurring within the latter part of "Phase II," after numerous other "Green Light" Master Plan projects, such as the Intermodal Transportation Center ("ITC"), Consolidated Rent-A-Car Center ("ConRAC"), Automated People Mover ("APM"), West Employee Parking Garage, and Ground Run-Up Enclosures ("GREs").

It would therefore appear that LAWA is either proceeding with the Master Plan significantly out of order (temporarily skipping over certain elements) or permanently dropping certain elements of the Master Plan. Either approach is problematic because elements such as the ITC, APM, ConRAC and GREs were included in the LAX Master Plan to address problems such as traffic, noise and air pollution associated with the Master Plan as a whole. Deleting or delaying those Master Plan elements would represent significant project changes and substantially undermine the accuracy and applicability of the analysis in the Master Plan EIR. Having committed to implement environmentally beneficial projects as part of the Master Plan according to an established

sequence, LAWA cannot now abandon those projects and/or delay them indefinitely. By proceeding with the CFTP and Bradley West Projects prior to the ITC, APM, ConRAC, GREs and other similar projects, it appears LAWA may be doing just that.

We raised this issue in El Segundo's comments on the Notice of Preparation ("NOP") for the Bradley West Project, and asked LAWA to respond. Although the DEIR includes several pages of discussion regarding the LAX Master Plan (DEIR at 1-2 through 1-11 and 2-2), it contains no meaningful response to El Segundo's comment. The closest the DEIR comes to responding is its statement that "The SAIP, the CFTP, and the Bradley West Project are only three of numerous improvements contemplated in the approved LAX Master Plan. As noted above, the nature, scope, and timing of implementing the various improvements at LAX take into account a number of considerations including the relationship of a proposed improvement to existing and future facilities at LAX." (DEIR at 1-10.) What LAW A seems to be saying with this statement is that it does not intend to follow the project phasing plan contained in the approved LAX Master Plan and may even abandon certain environmentally beneficial projects. LAWA cannot, however, legally depart from the approved Master Plan in this substantial way without formally amending that plan and conducting the necessary CEQA analysis. Put another way, LAWA cannot continue to tier off the LAX Master Plan EIR if it is no longer proceeding in a manner consistent with the Master Plan.

Response: The comment is noted. As further explained below, there is no set order in which LAWA must implement the LAX Master Plan projects and LAWA's decision to implement the Bradley West Project ahead of other LAX Master Plan projects does not mean LAWA is abandoning any other elements of the LAX Master Plan. Section 3.2.9, specifically, pages 3-81 to 3-85 of the LAX Master Plan Final EIR describes the proposed phasing of the overall Master Plan. The proposed phasing schedule included in the LAX Master Plan EIR was intended to show the general phasing and estimated construction durations for the various elements of the project for planning purposes only. (LAX Master Plan Final EIS/EIR, p. 3-81.) The LAX Master Plan Record of Decision (ROD) further clarifies the intent of the phasing schedule. It states: "[t]he listing of these projects is not necessarily the order in which these projects may be implemented." (LAX Master Plan ROD, Appendix C: Alternative D Proposed Project Phasing.) Furthermore, the original implementation planned for several elements of the LAX Master Plan was altered by the terms of the LAX Master Plan Stipulated Settlement, to which the City of El Segundo is party. The Stipulated Settlement re-states the language from the ROD, that the project phasing does not establish a set order. (Stipulated Settlement, Section IV.A.)

With execution of the Stipulated Settlement, certain elements of the LAX Master Plan, referred to as the "Yellow Light Projects," are required to undergo further evaluation to assess potential alternative designs, technologies, and configurations that would provide solutions to the problems that the Yellow Light Projects were designed to address consistent with a practical capacity of 78.9 million annual passengers (MAP). Such projects include the Ground Transportation Center (GTC) and associated baggage tunnel, Automated People Mover (APM), and roadways, as well as the reconfiguration of the north airfield as contemplated in the Master Plan and demolition of Terminals 1, 2, and 3. The Stipulated Settlement also specifies that LAWA may continue to process and develop projects that are not Yellow Light Projects, consistent with the LAX Specific Plan Compliance Review procedures. Consistent with the aforementioned provisions of the Stipulated Settlement, LAWA is currently conducting the Specific Plan Amendment Study (SPAS) to evaluate alternatives to the Yellow Light Projects while also continuing to process and develop projects that are not Yellow Light Projects, such as the South Airfield Improvement Project (completed), the Crossfield Taxiway Project (currently under construction), the Bradley West Project (proposed for consideration by decision-makers - the subject of this EIR), the Consolidated Rental Car (ConRAC) Facility (undergoing planning, design, engineering, and cost/feasibility evaluations), and the Midfield Satellite Concourse (undergoing preliminary planning, design, engineering, and cost/feasibility evaluations). While the implementation status of individual projects proposed in the LAX Master Plan is different than originally identified in the LAX Master Plan EIR, LAWA is still committed to the long-term completion of the overall Master Plan, with the understanding that certain elements (Yellow Light Projects) may be modified through the course of the SPAS, but would be designed to meet the functional intent of those original elements. Moreover, the Bradley West Project EIR accounts for and analyzes all new information about the proposed project in conjunction with related

past, present and reasonably forseeable future projects that was not available at the time the LAX Master Plan EIR was prepared.

Planning and implementation of the specific Master Plan projects referenced in the comment, such as the Intermodal Transportation Center (ITC), the APM, and the ConRAC, are in different stages of advancement, with the ConRAC being furthest along in the process. Given that these projects are all transportation-related, consideration is being given to coordinating the nature, location, and timing of these projects with the potential ground transportation systems improvements that will be identified through the SPAS process. While the ITC, APM, and ConRAC have not proceeded on the schedule presented in the LAX Master Plan Final EIR, the levels of increased aviation and passenger activities occurring at LAX since approval of the Master Plan have been substantially less than projected in the LAX Master Plan EIR. As indicated in Table F2-1 of the LAX Master Plan Final EIR, the passenger activity level at LAX in 1997 was 60.1 MAP and was projected to increase to 74.2 MAP in 2005. That level of projected growth at LAX did not materialize and, in fact, passenger activity levels dipped to less than that of 1997, with the passenger operations in 2008 reaching only 59.8 MAP and a likelihood that levels in 2009 will be even less. In terms of daily aircraft operations (including domestic, international, all-cargo, general aviation, and military flights), there were 2,114 average day operations in 1997 and a projection of 2,402 average day operations in 2005; while, in actuality, the number of average day aircraft operations at LAX in 2008 was only 1,705, and is anticipated to be even less in 2009. While there is not an immediate need to implement the types of transportation system improvements described above, due to the fact that airport activity levels and associated traffic are much lower than originally anticipated, LAWA has not "abandon[ed] certain environmentally beneficial projects" as suggested in the comment. LAWA remains committed to the completion of the SPAS process and the systematic implementation of LAX Master Plan improvements.

BWP-AL00001-2

Comment: ADG VI Gates and Operations: The NOP and DEIR make clear that LAWA is undertaking the Bradley West Project to increase dramatically LAX's ability to accommodate next generation Airplane Design Group VI ("ADG VI") Aircraft such as the Airbus A380. Specifically, the Project will provide facilities that are large enough and specially configured to accommodate large "ADG VI" aircraft. More importantly, those facilities will be provided as contact gates within the Tom Bradley International Terminal ("TBIT"), rather than in the distant and inconvenient Western Remote Gates.

In our comments on the NOP, we noted that the number of ADG VI gates proposed as part of the Bradley West Project appears to exceed the total number of ADG VI gates anticipated in the Master Plan. Whereas the Master Plan proposed a total of only six (6) such gates (see LAX Master Plan Tables 2.2-1 & 2.2-2), the DEIR calls for a total of nine (9) ADG VI gates (with other ADG VI gates operating elsewhere at LAX, including at the Western Remote Gates). (DEIR at 2-4, Figures 2-1, 2-2.) LAWA has not yet responded to our request for an explanation of this apparent departure from the approved LAX Master Plan. We renew our request for such an explanation and note that LAWA cannot properly rely on the CEQA analysis conducted for the LAX Master Plan if its projects are not consistent with that plan.

The addition of facilities specifically designed for ADG VI aircraft will naturally tend to encourage airlines to increase ADG VI aircraft operations at LAX. (See DEIR at 2-44 through 2-45 (explaining that if LAWA does not provide such facilities, airlines will use "smaller gauge aircraft" at LAX).) Although the City of El Segundo recognizes that there are potential benefits associated with increased Airbus A380 operations, it is also concerned that such an increase in Airbus A380 operations will increase the incidence of preferential runway policy violations by Airbus A380s departing from Runway 25L.

As LAWA's recent environmental documents for its Crossfield Taxiway Project make clear, LAWA anticipates that ADG VI aircraft such as the Airbus A380 will routinely violate the longstanding preferential runway policy1 in place at LAX, by departing from the runway closest to El Segundo (Runway 25L). (See CFTP DEIR at 2-12 fn 7.) Prior to departure, ADG VI aircraft will also apparently use Taxiway A, which is located even closer to El Segundo than Runway 25L. ADG VI

aircraft departures from Runway 25L, and the associated use of Taxiway A, will impose substantial adverse impacts on El Segundo residents, including increased noise and air pollution. LAWA must evaluate and make every reasonable effort to avoid and reduce those impacts.

Unfortunately, the DEIR ignores El Segundo's request, made in its NOP comments, that LAWA fully evaluate the impacts on El Segundo associated with the increased preferential runway policy violations that would result from proceeding with the Bradley West Project now and including such a large number of ADG VI aircraft gates within that project, thereby encouraging increased use of ADG VI aircraft at LAX before the airport has appropriate airfield facilities to accommodate the aircraft.

LAWA cannot properly rely on the programmatic analysis conducted in the Master Plan EIR as it does not cover this issue. Although the Master Plan may have assumed that ADG VI aircraft would temporarily depart from Runway 25L (in violation of the preferential runway policy) for a period of time prior to the construction of the north airfield improvements, the Master Plan should also have assumed that compliance with the preferential runway policy would be restored following the completion of those improvements. The Bradley West Project DEIR must therefore look at the impacts to El Segundo that would result from the combination of encouraging ADG VI aircraft operations through implementation of the Bradley West Project, while delaying implementation of airfield improvements that would allow ADG VI aircraft to operate consistent with the LAX preferential runway policy. Moreover, LAWA must evaluate the additional impacts to El Segundo associated with the proposal to increase the number of ADG VI aircraft gates provided at LAX above the six (6) evaluated as part of the Master Plan.

Finally, LAWA should focus on ensuring that other Master Plan improvements come on line to address the problem of ADG VI aircraft departures from Runway 25L. Most importantly, LAWA must proceed expeditiously with the SPAS process to identify and implement north airfield improvements to replace those that received a "Yellow Light" in the Master Plan process. LAWA should also evaluate measures designed to reduce the incidence of such violations. Specifically, LAWA should work with FAA to identify operational changes and airfield modifications to address the problem. LAWA should undertake an exhaustive effort to identify operational modes that would allow ADG VI aircraft to arrive, taxi and depart without violating LAX's longstanding preferential runway policy. This may mean restricting other aircraft operations during ADG VI aircraft arrivals, taxiing and departures. LAWA may also need to seek variances from FAA for certain separation standards, as it has done elsewhere at LAX.

1 The purpose of the preferential runway policy is to place arrivals on LAX's outboard runways (Runways 25L and 24R) and place noisier departures on LAX's inboard runways (Runways 25R and 24L), farther from the communities north and south of the airport.

Response: Providing for LAX's ability to accommodate "New Generation Aircraft" such as the Airbus A380, Boeing 747-8, and Boeing 787, is only one of several objectives of the Bradley West Project. It is not the primary emphasis of the project. As stated in Section 2.3 of the Bradley West Project Draft EIR, other objectives of the project include the following:

- Reduce the need for, and use of, existing remote gates at the west end of the airport and the need to bus passengers and crews between TBIT and the remote gates.
- Maintain or improve existing aircraft ground access between the north airfield complex and the south airfield complex.
- Improve passenger level of service.
- Avoid loss of international travelers to other airports outside the region and the adverse direct and indirect economic consequences this would cause.
- Complement the systematic phased implementation of the LAX Master Plan and minimize impacts to existing airport operations during construction.
- Provide a substantial number of construction employment opportunities and substantial direct and secondary regional economic benefits, including the need for construction goods and services, associated with construction of a large capital improvements project such as the Bradley West Project.

The number of ADG VI aircraft operations at LAX is driven primarily by market demand, not simply the number of gates. The provision of nine ADG VI gates instead of six would not cause a significant increase in ADG VI flights at LAX as compared to what was analyzed in the LAX Master Plan EIR. Please also see Response to Comment BWP- PC00011-49, and Appendix C-7, page 1. LAWA studied current and anticipated flight schedules, the airline carriers and alliances with international flights at LAX, the existing and anticipated tenant leases at TBIT, and incremental additional design and construction costs of upsizing a gate from ADG V to ADG VI, and determined that nine ADG VI gates would provide more flexibility and better efficiency in accommodating a variety of aircraft sizes at TBIT with enhanced passenger comfort and convenience. The provision of multiple adjacent gates that accommodate ADG VI aircraft at several locations around the proposed Bradley West concourses would enhance the ability to allocate a block(s) of gates to carriers and alliances that may have multiple ADG VI on the ground at the same time. This would allow an ADG VI to remain at the gate for a period between flights rather than having to tow it to and from an apron parking area because another ADG VI aircraft needs the gate. This ability to leave an aircraft at the gate does not increase the number of ADG VI flights, but rather avoids the need to tow aircraft between an apron parking area and the gate. Additionally, the provision of multiple ADG VI gates enhances LAWA's ability to provide for distinct gate and terminal space allocations to individual carriers that have very few ADG VI operations, but want to use the same gate area for the other smaller aircraft (i.e., ADG V) in their fleet.

Additionally, even with the nine ADG VI gates currently proposed, the total number of gates at LAX upon completion of the Bradley West Project would remain well below the gate limit specified in the LAX Master Plan Stipulated Settlement; please see Response to Comment BWP-AL00001-3.

An increase in A380 operations at LAX, compared to existing conditions, is not expected to increase the use of Runway 25L for A380 departures. Over the past several months, the vast majority of departures of A380 aircraft have shifted from Runway 25L in the south airfield complex to Runway 24L in the north airfield complex. The following provides a breakdown of A380 departures at LAX since initiation of A380 passenger service at LAX in October 2008.1

	Departure Runway		
Month	07R	24L	25L
October 2008			6
November 2008			9
December 2008	1	2	11
January 2009		6	12
February 2009		7	9
March 2009		13	1
01 April to 19 April 2009		12	2

The increased use of Runway 24L for A380 departures is acknowledged on page 4-364 of the Bradley West Project Draft EIR. As also indicated on that page, the use of runways for NLA departures at LAX, including the A380, are based on FAA standards and decisions by the FAA Air Traffic Control Tower (ATCT) completely independent of the Bradley West Project. Based on this trend in runway use, an increase in Airbus A380 operations at LAX is not expected to increase the number of preferential runway policy violations.

To the extent that A380 aircraft use Runway 25L, noise and/or air quality impacts to El Segundo residents would not increase. The Airbus A380 is a quiet aircraft compared to other smaller aircraft currently used extensively at LAX. In a comparison between the noise levels occurring in El Segundo from a Boeing 747-400 (ADG V aircraft) departing from Runway 25R and an Airbus A380 departing from Runway 25L, noise levels in El Segundo from the A380 were, for the most part, about 1 to 3 decibels less than those from the 747-400. A summary of that noise comparison analysis was presented at the LAX/Community Noise Roundtable in February 2009. A copy of the presentation is provided as Attachment 2 of this Final EIR. Neither the installation of nine ADG VI aircraft gates nor the operation of ADG VI aircraft at LAX is expected to have a significant impact on

noise, beyond what would occur as a result of the implementation of the LAX Master Plan. (See Section 4.8.1 of the Bradley West Project Draft EIR.)

Similarly, preliminary air quality data associated with operation of the Airbus A380 indicate that air pollutant emissions of that aircraft are, in general, lower than those of other existing large aircraft, such as the Boeing 747-400, that currently operate at LAX. Please see Response to Comment BWP-AL00003-6 for further details on this issue. However, the Bradley West Project Draft EIR analyzed the operational impact associated with the Bradley West Project and concluded that on-airport emissions from operational sources would be significant for CO, VOC, NOx, and SO2. (See Sections 4.4.2 and 4.4.6.3 of the Bradley West Project Draft EIR.) The cumulative airfield operations-related impacts for CO, VOC, NOx, SO2, PM10, and PM2.5 would also be significant. (See Section 4.4.9 of the Bradley West Project Draft EIR.)

LAWA shares the City of El Segundo's interest in advancing the SPAS process and implementing solutions for the north airfield that address the need for safety improvements and better airfield balance. LAWA has, in fact, spent substantial time, effort, and money in identifying, evaluating, and advancing a comprehensive program of improvements at LAX, in the form of the LAX Master Plan. Each and every build alternative considered for the LAX Master Plan included improvements to improve airfield safety and airfield balance. Following approval of the LAX Master Plan in December 2004, improvements to the south airfield were advanced to implementation, which reflects well the City of El Segundo's willingness and ability to work closely with LAWA in addressing public safety issues. The LAX Master Plan improvements to the north airfield were not advanced due to litigation filed against the LAX Master Plan EIR in 2005 and a resultant Stipulated Settlement in 2006 that required LAWA to evaluate other options for certain components of the LAX Master Plan including the north airfield complex. LAWA made a significant effort to obtain input from the community, the petitioners that are party to the Stipulated Settlement and other members of the SPAS Advisory Committee, and other stakeholders regarding options for improvements to the north airfield. Based on such input, LAWA identified a preliminary range of potential alternatives for improvements to the north airfield, which were presented in spring 2008 in the SPAS Draft EIR NOP. In summer 2008, the LAX North Airfield Safety Study (LAX-NASS) was commenced, in response to Los Angeles City Councilman Bill Rosendahl's call for completion of such a study by an independent firm selected with community input. The study is being conducted by a highly qualified team of NASA researchers and academic panel members in consultation with the North Runway Safety Advisory Committee and LAWA staff. LAWA looks forward to integrating the conclusions and recommendations of the LAX-NASS into the SPAS process and moving quickly towards implementation of acceptable solutions to the north airfield safety and balance issues.

1 Information provided by LAWA Noise Management Division on June 30, 2009, based on most current data available.

BWP-AL00001-3

Comment: Remote Commuter Gates: The approved LAX Master Plan clearly calls for the elimination of the remote commuter terminals historically used by American Eagle and United Express, and plans for commuter aircraft to instead be accommodated at contact gates in the Central Terminal Area. This aspect of the Master Plan is relevant because the Bradley West Project would involve demolition of the commuter terminal historically used by American Eagle.

The DEIR indicates that American Eagle's commuter flights would be relocated to the commuter terminal historically used by United Express. (See DEIR at 2-38, Figure 2-7.) Elsewhere, the DEIR explains that LAWA plans to upgrade the commuter terminal historically used by United Express by, among other things, installing jetways that will convert seven of the existing aircraft parking places from hard-stand to contact gates. (DEIR at 3-7.)

LAWA's proposal for dealing with these commuter gates is problematic for a number of reasons. First, because the LAX Master Plan clearly calls for the elimination of remote commuter gates, American Eagle commuter flights should be relocated to contact gates in the Central Terminal Area, not another remote facility. Likewise, upgrading the commuter terminal historically used by United

Express is patently inconsistent with the Master Plan, which calls for its elimination, not improvement.

Moreover, LAWA is clearly proposing significant modifications to the remote commuter facility in order to accommodate relocation of American Eagle commuter flights to that location. Those upgrades, if they are to occur in contravention of the Master Plan, must be considered part of the Bradley West Project and be evaluated as such. LAWA cannot argue that its modifications to the commuter terminal historically used by United Express have utility independent of the Bradley West Project because that facility has not been used by United Express for many years and there would be no reason to modify the facility were it not for the relocation of American Eagle as part of the Bradley West Project.

Finally, the DEIR indicates that LAWA intends to proceed immediately with these proposed commuter terminal modifications, but LAWA has not engaged in any environmental review or public process regarding those modifications. This is clearly improper.

Response: Demolition of the American Eagle Commuter Facility (elimination of 12 existing gates) and relocation of American Eagles' operations to other existing commuter gates is not in conflict with the LAX Master Plan nor is it inconsistent with the LAX Master Plan Stipulated Settlement to which the City of El Segundo is a party. Buildout of the LAX Master Plan provides for the replacement of remote commuter terminals with contact gates, as would be enabled through the addition of new gates on the west side of Tom Bradley International Terminal (TBIT). There are presently 12 passenger gate positions associated with the American Eagle Commuter Terminal which would be removed as part of the Bradley West Project. The removal of those existing gates would factor into the overall change in the number of gates that is attributable to the Bradley West Project as follows:

	Number of Aircraft Gates		
Location	Existing Conditions	With Bradley West Project	Change
Tom Bradley International Terminal (TBIT)			
North Concourse			
West Side	0	3	+3
East Side	6	5	-1
South Concourse			
West Side	0	6	+6
East Side	6	5	-1
TBIT Total	12	19	+7
American Eagle Commuter Terminal	12	0	-12
Total Number of Gates	24	19	-5

Under the proposed Bradley West Project, the addition of seven new gates at TBIT is offset by the elimination of 12 existing gates at the American Eagle Commuter Terminal, resulting in a net reduction of five gates. That reduction in remote commuter gates as part of the Bradley West Project is consistent with the phased implementation of the LAX Master Plan.

Subsection IV.A. of the Stipulated Settlement specifies that at the time the Settlement was executed, LAX had 163 total passenger aircraft gates. The commentor appears to reference Subsection IV.B.1 of the Stipulated Settlement which requires that, "commencing in 2010, LAWA will discontinue passenger operations at two narrow body equivalent gates ('NBEG') per year at LAX until LAWA has discontinued passenger operations by a total of 10 NBEG."

Subsection IV.C. further states, however, that "Subsection IV.B.1. above shall not apply if either (1) total passenger operations at LAX are below 75 million annual passengers [MAP] or…" In 2008 there were 59.8 MAP at LAX (Los Angeles World Airports [LAWA] Air Traffic Reports for December 2008, prepared by LAWA Financial Management Systems, February 4, 2009), and based on passenger operations thus far in 2009, it is anticipated that the overall passenger activity level for

LAX in 2009 will be less than that of 2008. In fact, passenger activity levels at LAX in the first 6 months of 2009 were approximately 10.8 percent lower than levels during the same period in 2008. Specifically, there were approximately 27 million passengers at LAX in January through June 2009, compared to 30.2 million passengers in January through June 2008 (LAWA Air Traffic Reports for June 2009-Year to Date, compiled July 2009). MAP levels are therefore well below the 75 MAP required to trigger section IV.B.1 of the Stipulated Settlement Agreement referenced in the comment letter, which is therefore currently not applicable.

Even if subsection IV.B.1 were applicable, based on the above, a total of 155 passenger aircraft gates would be allowed at LAX in 2013 when the Bradley West Project is completed (i.e., the 163 gates that existed at the time the Stipulated Settlement was signed, reduced by 2 gates per year commencing in 2010, resulting in 155 gates in 2013). The Bradley West Project would result in even fewer total passenger gates at LAX in 2013 (154). This is based on the most current gate count at LAX, completed in accordance with Subsection VI.F. of the Stipulated Settlement, which identified 159 existing aircraft passenger gates. That figure includes the 12 passenger gate positions associated with the American Eagle Commuter Terminal and the 18 existing passenger gate positions at the former United Airlines Commuter Terminal. The current gate count was physically verified by the parties to the Stipulated Settlement, including the City of El Segundo. With implementation of the Bradley West Project, 12 existing gates would be eliminated and seven new gates would be added resulting a net loss of five gates and a reduction in total passenger gates from 159 to 154.

The improvements anticipated to occur at the former United Airlines Commuter Facility are not proposed by LAWA and are not part of the Bradley West Project. The subject improvements, which are described in Section 3.3.3 of the Bradley West Project Draft EIR as one of the LAX development projects independent of the LAX Master Plan, would provide building system upgrades that do not alter the basic function and utility of the existing use. As described on page 3-7 of the Bradley West Project Draft EIR, the anticipated improvements include upgrading the existing electrical system to improve the power system and accommodate equipment that provides preconditioned (heated or cooled) air to parked aircraft and power for electric ground service equipment (GSE). These improvements are consistent with LAWA's environmental commitments (i.e., reduce air pollutant emissions from aircraft by providing preconditioned air instead of running an aircraft engine to provide air conditioning, and supporting electric GSE that can be used instead of gas/diesel-powered GSE), which are set forth in the LAX Master Plan, the LAX Community Benefits Agreement, and the Stipulated Settlement. Other improvements anticipated to occur at the subject facility include miscellaneous improvements common to any new tenant moving into a previously occupied space, such as code-related building, electrical, plumbing, and mechanical system upgrades, new carpet, paint, furnishings, etc. The anticipated installation of jetways on seven of the 18 existing aircraft hard-stand gates simply provides for improved comfort and convenience, and enhanced safety, for passengers moving between the terminal building and the aircraft. The anticipated installation of an outdoor canopy simply provides for weather protection. These anticipated improvements, individually and collectively, do not alter the basic function and use of, nor represent significant modifications to, the existing commuter terminal. The impacts associated with all LAX development projects described in Section 3.3.3 are included in the analysis of cumulative impacts in the Bradley West Project EIR.

BWP-AL00001-4

Comment: Busing Facilities: The DEIR includes incomplete, inconsistent and confusing information regarding the busing facilities that would be provided at TBIT and used to ferry passengers to and from remote gates at the west end of LAX. For example, the DEIR states that "existing bus gates would be replaced by a 28,400-square-foot busing operations hold room ... at the northern end of the existing north concourse." (DEIR at 2-11.) Given that the existing bus gate area at TBIT measure only 17,120 square feet (see DEIR Table 2-1), it appears that the Bradley West Project would approximately double the amount of space devoted to bus gates. LAWA's proposal to increase bus holdroom space so dramatically is mystifying in light of the fact that one of the stated goals of the Bradley West Project is to "reduce the need for, and use of, the existing remote gates for international flights." (DEIR at 2-11.)

The DEIR implies that the massive increase in bus holdroom space may be temporary and could be reversed later "to reflect the reduced need for busing." Id. The DEIR does not, however, explain why LAWA would need more busing space in the future (even temporarily) when it will have more contact gates and use the remote gates less.2 With that in mind, LAWA should scale back its proposed busing facilities. If it does not do so, the public will properly question whether LAWA is indeed committed to reducing use of the remote gates as it claims. Moreover, if any of the busing space is indeed intended to be temporary, LAWA must identify a clear timeline for its removal/reconfiguration. In the absence of such a timeline, the facilities must be considered permanent for purposes of CEQA and LAX Master Plan consistency analysis.

At the end of the north concourse, DEIR Figures 2-4 include a 38,681 square foot area labeled "Bus Gates" on level 3 with an open area above (on level 4) and miscellaneous related uses ("Departure Lounge", "Concession", etc.) below (on level 2). DEIR Figure 2-4b also shows a separate 11,657 square foot "Bus Gate Holdroom" to be constructed on level 2 near the center of the terminal. The sum of these areas apparently dedicated to bus gates on levels 2 and 3 is substantially larger than (and configured differently from) the 28,400-square-foot area discussed in the text of the DEIR. (DEIR at 2-11.) The reason for this inconsistency is not clear and must be addressed. Additionally, the DEIR offers no explanation regarding why LAWA proposes to construct two separate busing facilities as part of the Bradley West Project.

2 The DEIR indicates that "the proposed new contact gates on the west side of TBIT would reduce the need for busing passengers between the existing gates at the West Remote Pads and TBIT" but nonetheless concludes that "with the forecast increase in international operations between 2008 and 2013, the total daily bus trips would still increase from 113 in 2008 to 160 in 2013. (Without the Bradley West Project, the number would increase to 273 daily bus trips.)" (DEIR at 2-47.) These projections regarding increased busing demand are at odds with recent industry trends and with LAWA's own assertion that airlines would use smaller gauge aircraft at LAX to avoid using the remote gates if the project Bradley West Project is not built.

Response: The existing busing facilities at LAX, encompassing approximately 17,120 square feet of building area are severely undersized. The most common complaint from passengers processed through the existing facilities is that they are far too crowded, often being full with no available seating. Airline service counters and areas within the existing busing facilities are small and often crowded. Additionally, the existing facilities have minimal provisions for food and concessions, typically being vending machines and small kiosks. One of the objectives of the Bradley West Project is to improve passenger level of service, which includes all aspects of TBIT including the busing facilities. While implementation of the proposed project would reduce the need for, and use of, the west remote gates, the residual need to use those gates would still necessitate the need for larger busing facilities. This includes the interim periods when the existing gates along the east side of the existing TBIT concourses are taken out of service in order to relocate/replace the gates along the east side of the new concourses. The forecast for international operations indicates that the number of daily bus trips needed will increase between 2008 and 2013 from 113 to 160, even with the implementation of the Bradley West Project. (Bradley West Project Draft EIR, Section 2.4.1.3.) However, without the proposed project, the number of daily bus trips would increase from 113 to 273 due to the heavier reliance on, and use of, remote gates.

Figure 2-4b in the Bradley West Project Draft EIR includes a preliminary floor plan for the new Bus Gates facility located at the north end of the new north concourse. As shown, the space allocations include approximately 18,363 square feet (s.f.) for departure lounge area1, 4,197 s.f. for concessions, 7,900 s.f. for general circulation, 2,169 s.f. for restrooms, 1,395 s.f. for mechanical equipment, 375 s.f. for a Duty Free staging area, 375 s.f. for a shuttle wait area, and 1,949 s.f. for sterile arrivals (i.e., arriving passengers that have not been outside of any area secured by the airline/airport). These functional areas total approximately 36,723 square feet. The 38,681 s.f. at the Bus Gates facility shown in Figure 2-4c represents the total "footprint" of the second level of the Bus Gates facility, as measured by exterior building length times width. That is not, however, representative of the floor area of the second level, as the vast majority of that level would be open to the first floor below. It is anticipated that approximately 6,000 s.f. of floor area may be provided

on the second level of the Bus Gates facility (i.e., a mezzanine level) as additional seating area for departing passengers. While this amount of total floor area is a sizeable increase over the existing busing facilities floor area, it is considered reasonable and appropriate given how severely undersized the existing facilities are in every aspect, particularly with regards to the holdroom (departure lounge), the concessions area, the general circulation area, and the arrivals area. It is anticipated that this proposed Bus Gates facility would remain in use until the west remote gates are no longer needed. Once the remote gates are no longer needed, the proposed Bus Gates facility would be demolished and replaced by a new busing facility, which would be scaled to fit the reduced busing needs. (see Section 2.4.1.3 of the Bradley West Project Draft EIR.)

As discussed in Response to Comment BWP-AL00001-3 above, buildout of the LAX Master Plan provides for the elimination of the existing remote gates in conjunction with the addition of new contact gates on the west side of TBIT and the development of new gates with the future Midfield Satellite Concourse. As also discussed in Response to Comment BWP-AL00001-3, the continued use of remote gates following completion of the Bradley West Project is consistent with the provisions of the LAX Master Plan Stipulated Settlement, which the City of El Segundo is party to. It is generally anticipated that continued use of the remote gates may continue until the Midfield Satellite Concourse Project is completed. Once the remote gates are no longer used, a 38,681 s.f. Bus Gates facility would no longer be needed.

The 11,657 square-foot Bus Gate Holdroom referenced in the comment is an area reserved in the Bradley West Core for limited use as a single bus gate in the future, such as when the interim Bus Gates facility described above is no longer needed. This type of smaller bus gate facility is referenced in the third paragraph in Section 2.4.1.3 of the Bradley West Project Draft EIR.

The impacts that would result from operation of the busing facilities proposed as part of the Bradley West Project were analyzed in Section 4.4, Air Quality, and Section 5.7, Energy Supply and Natural Resources, of the Bradley West Project Draft EIR. The impact analysis compared the conditions in 2008 to those of 2013. The proposed 28,400 square-foot busing facility would be in operation throughout the course of those years and was accounted for in the analysis. Air emissions from passenger bus trips, both with and without the proposed busing facility, are shown in Table 4.4-15 of the Bradley West Project Draft EIR.

1 Design refinements currently being considered for the Bus Gates facility may reduce the departure lounge area to approximately 17,900 s.f.

BWP-AL00001-5

Comment: Western Remote Gates: The NOP indicates that as additional gates are constructed as part of the Bradley West Project, LAWA will no longer need to use some of the existing remote gates located in the western portion of the airport ("Western Remote Gates"), which are currently accessed by bus. As part of the Master Plan, LAWA indicated that the boarding facilities associated with the Western Remote Gates would be demolished once they were replaced by contact gates and no longer needed. (See Final LAX Master Plan EIR at 3-75 ("The Tom Bradley International Terminal (TBIT) would be reconfigured with the addition of a new north/south linear concourse on the west side of the existing building. The remote gates at the west pad facility would be eliminated and this area would be prohibited from use as a remote passenger boarding location.").)

Consistent with this commitment, LAWA should identify specific Western Remote Gates boarding facilities for elimination as part of the Bradley West Project. Doing so is necessary to demonstrate LAWA's commitment to faithful implementation of the Master Plan and full compliance with the gate constraints contained in the Stipulated Settlement. By contrast, failing to remove boarding facilities and simply redesignating Western Remote Gates as Remain Overnight ("RON") aircraft parking, as the DEIR indicates, sends the wrong message.3

3 LAWA has not pointed to any evidence that LAX suffers from a shortage of RON aircraft parking. Moreover, the provision of new RON spots is not an identified goal of the Bradley West Project.

Response: Please see Response to Comment BWP-AL00001-3 regarding the reasons why continued use of existing remote gates following completion of the Bradley West Project is not in conflict with the LAX Master Plan and is consistent with the provisions of the LAX Master Plan Stipulated Settlement. Additionally, as indicated in Section 2.3 of the Bradley West Project Draft EIR, one of the project objectives is to "Reduce the need for, and use of, existing remote gates at the west end of the airport and the need to bus passengers and crews between TBIT and the remote gates." While implementation of the proposed project would reduce the need for, and use of, the west remote gates, the residual need to use those gates would still require larger busing facilities. This includes the interim periods when the existing gates along the east side of the existing TBIT concourses are taken out of service in order to relocate/replace the gates along the east side of the new concourses. The forecast for international operations indicates with the implementation of the Bradley West Project the number of daily bus trips needed will increase between 2008 and 2013 from 113 to 160. (refer to Section 2.4.1.3 and Section 2.4.5 of the Bradley West Project Draft EIR). However, without the proposed project, the number of daily bus trips would increase from 113 to 273 due to the heavier reliance on, and use of, remote gates.

Regarding the footnote to the comment, which asks for evidence that LAX suffers from a shortage of "remain overnight" (RON) aircraft parking and that the provision of new RON spots is not an identified goal of the proposed Bradley West Project, the discussion at the top of page 2-11 of the Bradley West Project Draft EIR simply notes that with the addition of new contact gates at TBIT, the reduced use of remote gates for international arrivals and departures would make those gates more available for RON parking. Such use is more a matter of convenience than a matter of dire need or a specific objective of the project. With the reduced demands on the remote gates, it is more likely that aircraft arriving at the end of the day could simply remain parked at the gate overnight, rather than having to be towed to a hardstand RON position because another aircraft arriving later at night needs that remote gate.

BWP-AL00001-6

Comment: West Aircraft Maintenance/Aircraft Parking Area: The DEIR indicates that LAWA is proposing to construct a maintenance area for the Airbus A380 at the far west end of LAX on a 60-acre site located west of taxiway AA, east of Pershing Drive and south of World Way West. (DEIR at 3-8.) This is the same general area identified as the "West Construction Staging Area" in the DEIR and identified in the Master Plan for eventual development with an Employee Parking Lot. Developing this site as a massive aircraft maintenance area as LAWA apparently proposes would put additional maintenance operations close to El Segundo residences, exposing them to additional noise and air pollution. This proposal is a totally unacceptable departure from the LAX Master Plan, which clearly envisions a reduction, not an increase, in aircraft maintenance activities at LAX. (Master Plan FEIR at 3-78.) Likewise, the proposed site is not identified by the Master Plan for development as an aircraft maintenance area. (LAX Master Plan at 2-95, Figure 2.6-1.)

Moreover, although the DEIR does not acknowledge this fact, it appears that LAWA's proposal to develop the "West Construction Staging Area" as an aircraft maintenance area may be one of the reasons the DEIR identifies the need for other construction staging areas, including the Continental City site, in connection with the Bradley West Project. As El Segundo made clear in its NOP comments, construction activities should be focused at the west end of the airport, not the Continental City site.

Response: Inclusion of the potential West Aircraft Maintenance/Aircraft Parking Area in Section 3.3.3 of the Bradley West Project Draft EIR reflects a reasonably foreseeable potential for such a facility to be developed at LAX. As indicated on page 3-8 of the Bradley West Project Draft EIR, preliminary consideration is being given to the development of a maintenance facility that could accommodate the Airbus A380 and the area located southeast of the Pershing Drive/World Way West interchange is one potential area being evaluated. As noted in the Bradley West Project Draft EIR, the construction of such a project, if proposed and approved, would not occur until the fourth quarter of 2013. Based on the currently proposed construction schedule for the Bradley West Project, the vast majority of the Bradley West Project would be completed by that time, with only relocation of

existing gates to the east side of the new TBIT concourses and completion of Taxiway T remaining. At that point, the construction staging needs of the Bradley West Project would be substantially less than during the earlier phases of the construction. Additionally, the area currently being considered for the West Aircraft Maintenance/Aircraft Parking Area would occupy only a portion of the West Construction Staging Area; hence, other areas of the subject area could still be used to accommodate construction staging for the latter phases of the Bradley West Project.

The large dimensions of the facilities contemplated at the potential West Aircraft Maintenance/ Aircraft Parking Area reflect the fact that the key components, including the maintenance hangar and the ground run-up enclosure (GRE) would be designed to fully enclose large aircraft, such as the A380 and Boeing 747-8 and 787. Currently, A380s and other large aircraft cannot receive even routine maintenance within a sheltered/enclosed setting at LAX. The location of the subject maintenance area would be about the same distance from residences in El Segundo as the existing Continental Airlines and American Airlines maintenance areas at LAX.

It is important to note that prior to any approval of the potential West Aircraft Maintenance/Aircraft Parking Area, an environmental review of the subject project pursuant to the requirements of the California Environmental Quality Act (CEQA) must first occur. The types of concerns expressed by the commentor about that project, including its compatibility with the LAX Master Plan, would be addressed in the CEQA review conducted for the project.

BWP-AL00001-7

Comment: APM Station: As we mentioned in our comments on the NOP, LAWA's adopted Master Plan calls for construction of an Airside APM station in the Tom Bradley International Terminal. (See LAX Master Plan Figure 2.4-6.) However, neither the NOP nor the DEIR makes any mention of such a station or how it will be integrated into the Bradley West Project. The DEIR does indicate that a portion of the APM system included in the Master Plan was designated a "Yellow Light" project and is being reevaluated as part of the SPAS Process. The APM component envisioned for TBIT is not, however, a "Yellow Light" project, but rather an approved portion of the Master Plan. LAWA must, therefore, implement the Bradley West Project in a manner consistent with eventual construction of that APM system. Abandoning the APM system would constitute a substantial deviation from the Master Plan and violate CEQA.

Response: The subject Automated People Mover (APM) system is intended to provide access to and from the Midfield Satellite Concourse. It is currently anticipated that the Midfield Satellite Concourse APM connection point would be at the future Central Passenger Processor to be constructed just east of TBIT. The environmental implications of this APM system and whether there would also be a connection point at TBIT/Bradley West is to be addressed as part of the EIR for, and the design and engineering of, the Midfield Satellite Concourse Project.

BWP-AL00001-8

Comment: Terminal 4: DEIR Figure 2-2 notes that the centerline of the existing taxiway C10 between Terminal 4 and TBIT will be moved west as a result of the Bradley West Project. Please explain whether this movement will, in turn, provide more room for aircraft on the west side of Terminal 4, allowing it to accommodate larger aircraft on that side.

Response: No changes to the size and utilization of gates on the west side of Terminal 4 are proposed or anticipated as part of the Bradley West Project. The additional room between TBIT and Terminal 4 that would occur as a result of the Bradley West Project would, however, enable aircraft to taxi under their own power within the alleyway, reducing the current need for aircraft to be towed in the alleyway due to the existing tight clearances between aircraft parked at gates on both sides of the alley. This improvement would help reduce delays and congestion in the alleyway, but is not expected to substantially alter the overall operational characteristics of aircraft using Terminal 4.

BWP-AL00001-9

Comment: Figures Unclear: Some of the figures included in the DEIR contain details that should be explained in the document. Several of the areas of concern are discussed above under the "Busing Facilities" heading. Additionally, we note that DEIR Figure 2-2 includes a 75' wide rectangular shaded area between aircraft positions S9 and S7. This shaded area is not labeled, but should be. Given its location (directly west of an area marked "Bus Gate Holdroom" in Figure 2-4b), it appears possible that this shaded area is intended as a bus staging/boarding area. Please explain if that is the case, and if so, why LAWA is proposing to include two separate bus holdroom/gate areas in the Bradley West Project.

Response: Please see Response to Comment BWP-AL00001-4 regarding the several areas of concern with the busing facilities referenced in the comment. Regarding the 75' wide rectangular shaded area between aircraft positions S9 and S7, the subject area is not a bus staging/boarding area as suggested in the comment. The subject diagonal cross-hatch pattern represents a design provision in anticipation of a potential pedestrian bridge structure that could cross at that location and extend to the potential future Midfield Satellite Concourse west of the Bradley West Project. The 75' wide clear area was observed in the placement of the gate locations and aircraft parking positions S7 and S9 shown in Figure 2-2.

BWP-AL00001-10

Comment: Similarly, DEIR Figure 2-2 includes the labels "Future VSR" and "Existing APRL", but does not define or explain those terms.

Response: VSR stands for Vehicle Service Road and APRL stands for Aircraft Parking Restriction Line.

BWP-AL00001-11

Comment: DEIR Figure 2-7 indicates that the existing "American Airlines Low Bay Hangar" will be relocated to New Site 17 and labels two different spots as 17. One of those two site is the new United Airlines Cargo facility and may have been labeled 17 in error. Please clarify.

Response: The labeling error is noted. In response, Figure 2-7 of the Bradley West Project Draft EIR has been revised. Please see Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR.

BWP-AL00001-12

Comment: Airfield Balance: The City of El Segundo is interested in ensuring that aircraft operations at LAX are balanced between the north and south airfields. The need for balance is particularly important for large aircraft ("heavies"), which have historically used the south airfield (close to El Segundo) more than the north airfield. In our comments on the NOP, we encouraged LAWA to take the need for north-south airfield balance into consideration when it designs and analyzes the proposed Bradley West Project. We repeat that request here and note with disappointment that the DEIR does not address this issue directly.

Response: The Bradley West Project provides for improvements to TBIT and the associated relocation and improvement of Taxiways Q and S. Such improvements have little, if any, relationship to runway utilization and the assignment of heavy aircraft to either the north runway complex or the south runway complex, notwithstanding the fact that FAA Air Traffic Control Tower personnel, not LAWA, decide which aircraft use which runway. As indicated in Response to Comment BWP-AL00001-2, LAWA shares the City of El Segundo's interest in achieving a better balance in aircraft operations between the north and south airfield complexes. LAWA has spent substantial time, effort, and money in identifying, evaluating, and advancing a comprehensive program of improvements proposed for the north airfield complex, which would support more balanced operations. LAWA is continuing that effort through the North Airfield Runway Safety Study and the LAX SPAS, which were required by the LAX Master Plan Stipulated Settlement and/or local stakeholders.

BWP-AL00001-13

Comment: Transportation Impacts: The significant operational traffic impacts most relevant to El Segundo are at Aviation Blvd. and Imperial Highway (Intersection #16); Imperial Highway and Sepulveda Blvd (Intersection #71); Rosecrans Ave. and Sepulveda Blvd. (Intersection #125); and Sepulveda Blvd. and I-105 WB Ramp N/O Imperial (Intersection #139). (DEIR Table 4.2-6.) The mitigation measures proposed for Intersections 16, 125, and 139 are dismissed as "infeasible due to right-of-way constraints." (DEIR at 4-159 to 4-161.) However, these constraints are not detailed or explained in a manner that would permit the public to review and evaluate LAWA's conclusion. Please provide this information.

Response: As indicated in Section 4.2.9 of the Bradley West Project Draft EIR, potential improvements were identified for intersections that were anticipated to be significantly impacted, including Intersections #16, #125 and #139. The following provides additional information on the determination made in the Bradley West Project Draft EIR that the proposed improvements at Intersections #16, #125, and #139 would be infeasible to implement:

- Aviation Boulevard and Imperial Highway (Intersection #16)
In order to address the critical movement that is significantly impacted at this intersection, it would be necessary to widen the eastbound approach to the Aviation Boulevard and Imperial Highway intersection to provide two left-turn lanes, three through lanes, and a right-turn lane. The right-of-way constraints include the presence of large pier structures supporting the I-105 Freeway, which passes over the subject area. The provision of additional travel lane area would cost approximately $22 million, which includes the cost to construct the travel lane, reconfigure the I-105 freeway structure, make signal modifications, and acquire approximately 15,600 square feet of land/right-of-way for the travel lane itself. This cost estimate was developed using the Caltrans Construction Cost Index (CCI) with inflation rates applied from the California Construction Cost Index. Land values were based on data from the Los Angeles County Assessor.1 The removal and relocation/reconstruction would also be infeasible for environmental reasons. The potential improvements would result in the substantial disruption of traffic flows on Imperial Highway and Aviation Boulevard near the pier structures due to lane closures associated with major physical construction. The closures and construction activity would generate construction-related air pollutant emissions and noise impacts. For the reasons noted above, the potential improvements to mitigate the significant impact at this intersection were determined to be infeasible to implement.

- Rosecrans Avenue and Sepulveda Boulevard (Intersection #125)
Mr. Patrick Tomcheck of LAWA staff contacted Mr. Steve Finton, City Engineer, City of Manhattan Beach, on August 5, 2009 regarding the northbound lane configuration at this intersection. Mr. Finton stated that the removal of the fourth northbound through lane is intended to be temporary. After utility (oil line) work is completed and the railroad crossing north of Rosecrans Avenue is widened, the lane striping for the westbound free-right turn will be revised and the fourth northbound lane reopened. This improvement, which is a traffic mitigation for the Plaza El Segundo development, is expected to be completed before the end of 2010. The Draft EIR for the Bradley West Project assumed that the northbound through lane would not be open in 2013. Therefore, the level of service and v/c calculations in the Bradley West Project Draft EIR have been revised to reflect this improvement. Please see Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR. Despite this change, the Draft EIR correctly stated that the impact to this intersection would be significant and unavoidable. In order to mitigate the critical movement that is significantly impacted at this intersection, it would be necessary to widen the northbound approach to the Rosecrans Avenue and Sepulveda Boulevard intersection to provide two left-turn lanes, five through lanes, and one right-turn lane and widen the southbound approach to provide two left-turn lanes, four through lanes, and one right-turn lane. However, this improvement is considered infeasible due to right-of-way constraints north and south of the intersection along Sepulveda Boulevard. The right-of-way constraints include the presence of a gas station on the southwest corner of the intersection, a hotel immediately south of the gas station, a Fry's Electronics store on the southeast corner and two Manhattan Village residential buildings immediately south of Fry's Electronics. The provision of additional travel lane area would cost approximately $3.6 million, which includes the cost to reconfigure (widen) a bridge structure approximately 400 feet south of Rosecrans Avenue, construction costs to implement the travel lanes and signal modifications, and

the cost to acquire approximately 21,000 square feet of land/right-of-way for the travel lanes. The provision of additional travel lane area would also require the demolition of the buildings mentioned above at an estimated cost of up to $46.4 million. This cost estimate was developed using the Caltrans CCI with inflation rates applied from the California Construction Cost Index. Land values were based on data from the Los Angeles County Assessor.1 Implementation of this mitigation measure would also have environmental impacts associated with major physical construction, including disruption of traffic flows, generation of construction-related air pollutant emissions and noise impacts, loss of employment from removal of several commercial uses, and loss of housing. For the reasons noted above, the potential improvements to mitigate the significant impact at this intersection were determined to be infeasible to implement.

- Sepulveda Boulevard and I-105 ramp north of Imperial Highway (Intersection #139)
In order to address the critical movement that is significantly impacted at this intersection, it would be necessary to widen the northbound approach to the Sepulveda Boulevard and I-105 ramp north of Imperial Highway to four through lanes. However, the entrance to the Sepulveda Tunnel is approximately 535 feet north of the I-105 off-ramp. If a fourth northbound through lane were to be installed from Imperial Highway to the tunnel entrance, there would be insufficient distance to provide the necessary signing and striping in advance of the lane drop (from four lanes back to three lanes through the tunnel) required by Caltrans.2 With a posted speed limit of 40 miles per hour, approximately 1,040 feet of distance would be needed north of the I-105 off-ramp to accommodate the lane reduction signing and striping from four lanes to three lanes. To achieve the distance needed to safely accommodate the lane reduction, the Sepulveda Tunnel would need to be widened. In 1994, DMJM Consultants, working for LAWA, prepared a feasibility study to determine alternatives to increase the traffic capacity through the Sepulveda Tunnel. The preferred alternative was to create new tunnels (one northbound and one southbound) parallel to the existing tunnel. Regarding construction of the preferred alternative, the report states: "The proposed tunnels could be built using either cut-and-cover or pipe-roof construction method. The cut-and-cover method is a simple technique involving excavation along the entire length of the tunnel for construction of its roof and walls. This would require temporary closures of two airport runways above the tunnel, each for 60 days. The pipe-roof method is a tunneling technique requiring excavation only at two jacking pits and four retrieval pits. Although this method could be accomplished without runway closures, it is not technically proven for shallow tunnels with lengths comparable to that of the proposed tunnel." In 1993, the report estimated the cost to construct the two parallel tunnels to be $195,000,000; the cost to build these tunnels would be considerably higher today. Although the traffic impact for the Bradley West Project at the intersection of Sepulveda Boulevard and the I-105 ramp north of Imperial Highway could be mitigated with the construction of the northbound parallel tunnel, the construction would come at considerable expense and would result in significant disruptions to LAX and the surrounding transportation system. The potential improvement would also be infeasible for environmental reasons. Implementation of this improvement would have environmental impacts associated with major physical construction, including disruption of traffic flows, and generation of construction-related air pollutant emissions and noise impacts. For the reasons noted above, the potential improvement to mitigate the significant impact at this intersection was determined to be infeasible to implement.

1. California Department of Transportation (Caltrans), Price Index for Selected Highway Construction Items, Second Quarter ending June 30, 2009, Available: http://www.dot.ca.gov/hq/esc/oe/contract_progress/cost-index-summary.pdf; Los Angeles County Office of the Assessor, Property Assessment Information System, 2009.

2. Caltrans, California Manual on Uniform Traffic Control Devices, Figure 3B-12 (CA), "Examples of Signs and Lane Reduction Markings (Sheet 1 of 3)," September 2006.

BWP-AL00001-14

Comment: The proposed mitigation for Intersection #71 is described as feasible and is predicted to reduce the impact to a less-than-significant level. (DEIR at 4-161 to 4-162.) However, the DEIR does not present any evidence that this mitigation would be sufficient, and fails to analyze any potential indirect impacts of the recommended mitigation measure. Please correct these deficiencies.

Response: As described on pages 4-161 and 4-162 of the Bradley West Project Draft EIR, the mitigation proposed (MM-ST (BWP)-6) for the intersection of Imperial Highway and Sepulveda Boulevard (#71) consists of restriping the northbound approach to the Imperial Highway and Sepulveda Boulevard intersection to provide one left-turn lane, three through lanes, and two right-turn lanes. The restriping of the northbound approach would mitigate the impact to a less-than-significant level. As shown in Table 4.2-10 of the Bradley West Project Draft EIR, the level of service in the midday peak would improve from LOS F (v/c=1.040) to LOS C (v/c=0.780) and in the p.m. peak from LOS F (v/c=1.120) to LOS C (v/c=0.750). The "with mitigation" LOS values for this intersection were calculated under the Future (2013) With Project Conditions. This involved changing the lane configuration (to match the mitigation measure described above) in the Intersection Capacity Utilization (ICU) calculation. For additional detail see methodology discussion in Section 4.2.2 beginning on page 4-87 of the Bradley West Project Draft EIR. The results of these calculations were compared to the Future-Adjusted (2013) Without Project Conditions (not including any mitigation measures) to determine whether the impact was mitigated to a less-than-significant level.

The work associated with implementing this type of mitigation measure is generally carried out during off peak traffic periods and does not involve any major physical construction. Therefore, the indirect impacts of such an improvement are expected to be minimal and less than significant.

BWP-AL00001-15

Comment: Please explain why different lists of intersections are studied in the operational and construction transportation chapters. (Compare DEIR 4-100 to 101 with 4-180.)

Response: The number of intersections selected for the Bradley West Project off-airport surface transportation analysis differs from the intersections selected for the construction surface transportation analysis due to the level and type of trip generation associated with project construction traffic versus project operations traffic.

The study area for the off-airport surface transportation analysis is discussed on page 4-93 in Section 4.2.3.1 of the Bradley West Project Draft EIR. As discussed therein, "[t]he project study area was determined through the use of the travel demand forecasting model and input from LADOT during the MOU process. Project trips were added to the model and assigned to the roadway network. The study intersections were then presented to LADOT for their approval." As further indicated on pages 4-100 and 4-101 in Section 4.2 of the Bradley West Project Draft EIR, 71 intersections were selected for the off-airport surface transportation analysis due to the nature of the trip-making associated with the Bradley West Project operations. As indicated in Table 4.2-3 on page 4-117 of the Bradley West Project Draft EIR, a total of 1,690 trips were estimated to occur during the a.m. peak hour, 1,936 during the midday peak hour and 1,556 during the p.m. peak hour. These trips are estimated to be regional in nature and spread out in all directions from/to the airport. These trips are also associated with many different locations around the airport with origination/destinations at the Central Terminal Area (CTA), airport parking lots, employee parking lots, various rental car facilities and off-airport parking. Given the numerous trip types associated with different uses on the airport, the coverage required for intersection analysis is more extensive than for a temporary scenario such as construction traffic.

The study area for the construction surface transportation analysis is discussed on pages 4-171 and 4-176 in Section 4.3 of the Bradley West Project Draft EIR. As discussed on page 4-171, "[t]he study area (explained further in Section 4.3.3.1 below) was defined according to the travel paths that would be used by construction traffic to access the project site, equipment, materials staging, and parking areas. Construction delivery vehicle travel paths would be regulated according to the construction traffic management plan detailed within the LAX Master Plan Mitigation Monitoring and

Reporting Program." As further discussed on page 4-176 in Section 4.3.3.1 of the Bradley West Project Draft EIR, "[t]he scope of the study area was determined by identifying the intersections most likely to be used by construction-related vehicles accessing the Bradley West Project construction site and construction employees accessing construction parking areas." As indicated on page 4-180 in Section 4.3 of the Bradley West Project Draft EIR, 28 intersections were selected for the construction surface transportation analysis for the Bradley West Project. The peak hour for the Bradley West Project construction traffic is different from the peak hour for the Bradley West Project operations traffic. In accordance with commitments and mitigation measures established as part of the LAX Master Plan, various controls are in place to limit truck delivery hours and construction employee shift hours such that construction traffic would generally peak outside of the traditional street traffic peak in the vicinity of the airport (refer to LAX Master Plan Commitments ST-12 and ST-14 on page 4-211 in Section 4.3.7 of the Bradley West Project Draft EIR). The Bradley West Project morning peak hour would occur between 6:00 to 7:00 a.m. and the evening peak hour would occur between 3:30 to 4:30 p.m. Furthermore, the construction-related trips are comprised of three sources of traffic that affect the off-airport roadway system consisting of truck delivery trips, construction employee trips, and shuttle bus trips required to transport employees to/from their assigned parking areas to the construction site. In accordance with LAX Master Plan Commitment ST-16, truck delivery trips will be required to use the freeway system to access the airport. As a result, these truck trips (i.e., 5 entering and 5 exiting during the construction-related a.m. peak hour) will have no effect within the study area except those in the direct route between the freeway terminus points and the staging area. The key intersections affected by this route were identified and analyzed as part of this EIR. For the construction employee trips, traffic volumes are significantly lower than the operational trips that were used to establish the overall study area. As indicated in Table 4.3-7 on page 4-195 of the Bradley West Project Draft EIR, a total of 481 construction employee trips would enter and/or exit the study area during the construction-related a.m. peak hour. During the construction-related p.m. peak hour, a total of 601 trips would enter and/or exit the study area. Under a potential temporary "surged" condition, an additional 357 trips would enter and/or exit the study area during the construction-related p.m. peak hour. This level of traffic activity is substantially less than the trips that would be generated due to Bradley West Project operations as identified above and in the off- airport surface transportation analysis in Section 4.2 of the Bradley West Project Draft EIR. In addition, the construction traffic would be focused along designated arterials and freeways with a maximum of four potential destinations within the study area (Northwest Construction Staging/Parking Area, the West Construction Staging Area, the Southeast Construction Staging/Parking Area and the East Contractor Employee Parking Area).

For the reasons discussed above, it is appropriate to use different study areas for the off-airport surface transportation analysis (Draft EIR Section 4.2) and the construction surface transportation analysis (Draft EIR Section 4.3).

BWP-AL00001-16

Comment: Construction Traffic: Under all four construction parking scenarios, El Segundo will be heavily burdened by construction traffic, which has air quality and noise impacts in addition to adding to traffic congestion. (See Figure 4-3.4.) The DEIR predicts that even those vehicles accessing the Northwest Construction Parking/Staging Area will travel on Imperial Highway and on sections of I-105 and I-405 bordering El Segundo. As mitigation for these impacts, and in the interest of fairly distributing impacts to surrounding communities, LAWA should require a set proportion of construction traffic to use routes that do not impact El Segundo.

Response: Potential construction-related air quality impacts associated with the Bradley West Project are addressed in Section 4.4 of the Bradley West Project Draft EIR. Significant air quality impacts are expected to occur from project construction, although the vast majority of the construction emissions would be from on-site equipment and not from vehicle travel (see construction emissions summary tables at the beginning of Attachment 1 of Appendix E of the Bradley West Project Draft EIR). Applicable LAX Master Plan mitigation measures are delineated in Section 4.4.5 of the Bradley West Project Draft EIR, but would not reduce the air quality impacts to a level that is less than significant. As further described below, the proposed construction routes are intended to

provide the shortest and more direct access to construction staging/parking areas using suitable roads that do not extend into residential communities. The commentor's recommendation for vehicle access routes that direct vehicles around El Segundo (i.e., "use routes that do not impact El Segundo") would lengthen the anticipated travel distances, which would only increase/exacerbate the air quality impacts of the Bradley West Project.

Construction-related noise impacts associated with the Bradley West Project are addressed in Section 4.8 of the Bradley West Project Draft EIR. No significant impacts to noise-sensitive land uses within El Segundo would occur from construction of the Bradley West Project.

Construction-related traffic impacts projected to occur on affected roadways, including within the City of El Segundo, are addressed in Section 4.3 of the Bradley West Project Draft EIR. As shown in Figure 4.3-2 of the Draft EIR, 12 intersections in or near El Segundo were analyzed (i.e., Intersection Nos. 16, 19, 47, 67, 68, 69, 71, 73, 74, 75, 94, and 98). Two of those intersections, specifically Nos. 68 and 69, were determined to be significantly impacted by construction traffic; however, feasible mitigation measures that would reduce the impacts to a level that is less than significant were identified for both intersections as discussed and shown in Section 4.3.10 and Table 4.3-19 of the Bradley West Project Draft EIR, respectively. Thus, no significant traffic impacts to roadways or intersections within or near the City of El Segundo would occur from construction of the Bradley West Project. Notwithstanding, the following provides additional information and discussion regarding the Bradley West Project Draft EIR's analysis of construction-related traffic, including as specifically related to El Segundo.

There are three types of trips that are assumed to utilize off-airport roadways: construction employee traffic, delivery trucks, and employee parking shuttles as discussed in Section 4.3.4 of the Bradley West Project Draft EIR. Material and equipment transfer trucks that move goods between the construction staging area and the construction site are assumed to utilize on-airport roadways.

Employee parking shuttles would be used to travel between the employee parking lot(s) and the construction work site. For the example of the Northwest Construction Staging/Parking Area, the shuttle bus route would not produce additional trips using Imperial Highway.

For the Bradley West Project construction surface transportation analysis, construction employee trips were allocated based on regional population distributions developed using information obtained from the LAX Master Plan Final EIR and the 2006 Air Passenger Survey. Based on the route distribution percentages shown in Figure 4.3-4 of the Bradley West Project Draft EIR, approximately 68 percent of the construction employee trips are estimated to originate from areas south and southeast of the airport. Because employees are assumed to travel in a manner as to minimize their travel distance and time, those construction employee trips originating from the south and southeast of the airport that are destined for the Northwest Construction Staging/Parking Area (located east of the intersection of Pershing Drive and Westchester Parkway) are assumed to access the employee parking facilities via Imperial Highway. Given that private citizens selected route of travel on the public roadway system cannot be dictated or enforced, it is assumed that employees would take this most direct route to the Northwest Construction Staging/Parking Area.

Designated truck routes, however, are subject to LAX Master Plan Commitment ST-22 defined within the LAX Master Plan Mitigation Monitoring and Reporting Program. This commitment designates that truck traffic associated with aggregate and all other materials and equipment deliveries utilize designated routes only (i.e., freeways and non-residential streets) and avoid residential frontages. Therefore, the construction traffic analysis was based on the assumption that delivery trucks accessing the Northwest Construction Staging/Parking Area would maximize the use of freeways and minimize the travel on local roadways and streets. The resultant route for delivery trucks includes I-105, Imperial Highway, and Pershing Drive. As noted above, the increased traffic using this route as a result of construction traffic resulted in significant impacts at the intersection of Imperial Highway and Pershing Drive (Intersection #69) and Imperial Highway and Main Street (Intersection #68); however, both of these intersections could be fully mitigated to less-than-significant levels by providing additional lane capacity.

Relative to the commentor's suggestion of routing traffic to avoid El Segundo, this suggestion would divert truck traffic to Westchester Parkway in order to access the Northwest Construction Staging/Parking Area. This would result in diverting truck traffic from the freeway system to the local roadway system, resulting in increased congestion and delays to local area residents using the surface area roadway system. Furthermore, the trucks would be using already congested intersections that would be exacerbated by the increased truck activity, but without the available right-of-way needed to mitigate these impacts. In addition, it would be expected that increased use of the surface roadway system, and added delays and increased idling associated with travel along the surface roadway network, would result in increased vehicle emissions.

As discussed above, the referenced intersections would be fully mitigated to a level that is less than significant. For the reasons described above, the suggested mitigation is not feasible.

BWP-AL00001-17

Comment: Additionally, it should be noted that Imperial Highway is currently in a state of disrepair due to deferred maintenance and heavy truck use, particularly in connection with LAX. LAWA should therefore provide for the repaving/reconstruction of Imperial Highway as needed to accommodate the heavy construction truck traffic associated with the Bradley West Project.

Response: The comment that LAWA should repave/reconstruct Imperial Highway due to the current disrepair of sections of Imperial Highway within the study area and the projected additional heavy construction truck traffic associated with the Bradley West Project is noted. This is an existing condition not associated with the Bradley West Project. LAX Master Plan Commitment ST-17, Maintenance of Haul Routes, stipulates that haul routes on off-airport roadways will be maintained periodically and comply with City of Los Angeles or other appropriate jurisdictional requirements for maintenance, and that minor striping, lane configurations, and signal phasing modifications will be provided as needed. Master Plan Commitment ST-17 is incorporated into the Bradley West Project, as discussed in Section 4.3.7 of the Bradley West Project Draft EIR. In addition to this maintenance commitment, according to an e-mail on May 14, 2009 from LADOT (Tim Conger, Transportation Engineer, Geometric Design Section) to LAWA (Patrick Tomcheck, Senior Transportation Engineer), the resurfacing of Imperial Highway from Pershing Drive to west of the I-105 terminus is in the 2009-2010 fiscal year street resurfacing program, although it is unknown as to when the project will be scheduled to begin. This resurfacing project has been added to the list of related projects in Table 3-1 and Table 4.2-5 of the Bradley West Project Draft EIR. Please see Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR.

BWP-AL00001-18

Comment: Construction parking Scenarios 3 and 4 assume a temporary 60% surge in construction employee parking demand, and allocate that demand among the Southeast and Northwest Construction Parking/Staging Areas, with 63% going to one area and 37% to the other. (DEIR at 4-173.) However, there is no mechanism in place to ensure that one of these areas is not burdened by 100% of the surged demand. A mitigation measure should be added to cap the number of construction employees who can use a single parking area at 601, the number analyzed in the DEIR.

Response: The comment is noted. In response, page 4-228 of the Bradley West Project Draft EIR has been revised to add the mitigation measure presented below. Please see Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR.

MM-ST (BWP)-12 Distribution of Contractor Employee Parking between the Northwest Construction Staging/Parking Area and the East Contractor Employee Parking Area or Southeast Construction Staging/Parking Area.

General parking for Bradley West Project contractor employees within the Northwest Construction Staging/Parking Area and within the East Contractor Employee Parking Area or Southeast Construction Staging/Parking Area shall be distributed such that neither the northwest area (i.e., Northwest Construction Staging/Parking Area) or the east/southeast area (i.e., East Contractor

Employee Parking Area or Southeast Construction Staging/Parking Area) is assigned parking for more than 601 vehicles. Should the need for contractor employees' daily general parking exceed 601 vehicles in either of these areas (northwest area or east/southeast area), the additional increment of daily parking demand shall be assigned to the other area.

It should be noted that the need for this new mitigation would be alleviated if LAWA adopts Alternative 4: Construction Staging/Parking Areas-Optimize Use of West Construction Staging Area to Include Worker Parking, which would direct the primary parking for contractor employees away from both the northwest area and the east/southeast area.

BWP-AL00001-19

Comment: Please explain the discrepancy between: (1) Figure 4.3-6, which indicates that the West Construction Staging Area (referred to as location F in Figure 4.3-6) is one of the parking and staging locations for the Bradley West Project, and (2) the analysis in Chapter 4.3 of the DEIR, which only discusses the Northwest Construction Parking/Staging Area, Southeast Construction Parking/Staging Area, and East Contractor Employee Parking Area.

Response: As described in Section 4.3.4.2 of the Bradley West Project Draft EIR, given the dynamic nature of the LAX construction program, LAWA studied the impacts of operating from one or a combination of employee parking areas in order to maintain future flexibility to address changes in the construction program. The analysis results in a mitigation program that addresses the "worst case" traffic volume condition that would be anticipated based on a combination of parking scenarios. The four traffic demand and trip distribution scenarios specifically assess the potential impacts associated with providing construction employee parking at one or a combination of the three areas designated as the Northwest Construction Staging/Parking Area, the Southeast Construction Staging/Parking Area, and/or the East Contractor Employee Parking Area. The locations of these staging/parking areas are depicted in Figure 4.3-4. The analysis of these four demand and trip distribution scenarios was prepared to ensure that all potential intersection impacts would be accounted for in the event the need arises to adjust construction employee parking locations over the course of the project.

As described under Scenario 1 and Scenario 3 beginning on page 4-196 of the Bradley West Project Draft EIR, the analysis for these construction traffic scenarios was based on the assumption that construction employees and vehicle staging would be accommodated in the Northwest Construction Staging/Parking Area. Page 4-199 of the Bradley West Project Draft EIR also notes that under Scenario 1, LAWA may elect to use an employee parking area on the west side of the airport accessed via World Way West. This location is the West Construction Staging Area depicted as Location "F" in Figure 4.3-6 on page 4-207 of the Bradley West Project Draft EIR. As a point of clarification and correction, however, the use of the West Construction Staging Area for contractor employee parking is not included in the proposed project, but rather is an option presented as Alternative 4 in Chapter 6 of the Bradley West Project Draft EIR. Under the proposed project, the West Construction Staging Area would only be used for construction staging. For the purpose of the construction traffic analysis completed for the Bradley West Project Draft EIR, the truck delivery trip assignments for the West Construction Staging Area were assumed to be the same as for the Northwest Construction Staging/Parking Area (i.e., truck trips would occur on Imperial Highway and Pershing Drive). Therefore, for consistency with the construction traffic analysis completed for the proposed project, Figure 4.3-6 on page 4-207 of the Bradley West Project Draft EIR has been modified to remove contractor employee parking from the West Construction Staging Area, but still show the area as being used for construction staging. Also, the paragraph at the top of page 4-199 of the Bradley West Project Draft EIR has been supplemented to clarify that the use of the West Construction Staging Area for construction employee parking is reflected in Alternative 4, as addressed in Chapter 6 of the Bradley West Project Draft EIR. Please see Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR.

Section 6.4.3.4 of the Bradley West Project Draft EIR notes that, as an alternative (Alternative 4), it is possible that the Bradley West Project would use the West Construction Staging Area for staging and contractor employee parking, which would reduce the need to put construction employee parking within the Northwest Construction Staging/Parking Area, the Southeast Construction

Staging/Parking Area, and/or the East Contractor Employee Parking Area. (See also Topical Response TR-BWP-ST-1 regarding the refinement and additional evaluation of Alternative 4.) Alternative 4 would use the West Construction Staging Area to fully meet contractor employee parking demand for Scenario 1 and Scenario 3 which are based on an estimated maximum parking capacity of approximately 600 vehicles at this location. Given the proximity of the West Construction Staging/Parking Area to the Northwest Construction Staging/Parking Area, it is anticipated that the regional trip distribution to this West Construction Staging/Parking Area would be generally the same as for the Northwest Construction Staging/Parking Area which was specifically analyzed for this Bradley West Project Draft EIR under the Scenario 1 and Scenario 3 conditions (as described in Section 4.3.4.2 of the Bradley West Project Draft EIR). Therefore, traffic volumes and anticipated levels of service would be generally the same throughout the study area for both locations, except for four intersections serving as primary access routes to the construction parking areas that would experience a slight redistribution of traffic as compared with the information presented in Section 4.3.4.2 of the Bradley West Project Draft EIR. Namely, these intersections are Imperial Highway and Sepulveda Boulevard (Intersection #71), Imperial Highway and Main Street (Intersection # 68), Imperial Highway and Pershing Drive (Intersection # 69) and Pershing Drive and Westchester Parkway (Intersection #123). The traffic analysis associated with these intersections is documented in Topical Response TR-BWP-ST-1.

BWP-AL00001-20

Comment: The cumulative construction traffic impact analysis omits any assessment of construction parking Scenarios 1 and 2. (DEIR at 4-221.) The DEIR reasons that Scenarios 3 and 4 represent the worst-case conditions, and therefore does not do the analysis for Scenarios 1 and 2. But an assessment of Scenarios 1 and 2 would still be useful to provide decision-makers with an understanding of the relative merits of those two scenarios. Please provide this analysis.

Response: As noted in Section 4.3 of the Bradley West Project Draft EIR, the cumulative impacts analysis was prepared to represent a combined "worst case" condition comprised of two scenarios (i.e., Scenario 3 and Scenario 4) where traffic activity was assumed to "surge" to a total volume 60% greater than directly derived from the resource loaded schedule. This artificially high traffic volume was then distributed among the Northwest Construction Staging/Parking Area and the Southeast Construction Staging/Parking Area in order to provide a composite roadway traffic scenario that would identify the collective impacts and required mitigation measures that would address any anticipated impacts associated with operating construction employee and/or construction staging lots at one or more locations identified for the Bradley West Project. As the traffic volumes associated with Scenario 3 and Scenario 4 were substantially higher than the "non-surged" Scenario 1 and Scenario 2, all associated cumulative impacts were identified and mitigated under the analysis conducted for the higher volume Scenario 3 and Scenario 4. Therefore, the lower volume scenarios were not presented in the Draft EIR. However, in response to this comment, a cumulative construction traffic impact analysis of construction employee parking and staging Scenarios 1 and 2 has been prepared. The results of the additional analysis, provided below, demonstrate that the cumulative impacts associated with Scenarios 1 and 2 would be comparable to, or less than, the cumulative impacts associated with Scenarios 3 and 4, as addressed in Section 4.3 of Bradley West Project Draft EIR. The detailed analysis follows.

The analysis described below summarizes the conditions that would occur at the peak of the Bradley West Project construction (Fourth Quarter 2011) combined with the peak cumulative condition that would occur in the Fourth Quarter of 2010 under both Scenario 1 and Scenario 2. These cumulative impact comparisons are presented in Table 1 and Table 2, respectively. Scenario 1 assumes that all construction employee parking would occur at the Northwest Construction Staging/Parking Area or, alternatively, the West Contractor lot located in the southeast quadrant of the interchange of World Way West with Pershing Drive. Scenario 2 assumes that all construction employee parking would occur at the East Contractor Employee Parking Area or the Southeast Construction Staging/Parking Area.

As shown in Table 1, under the assumptions of Scenario 1, the following intersections would experience cumulative impacts where the project component would be cumulatively considerable:

- La Cienega Boulevard and Century Boulevard (Intersection #36) during the construction p.m. peak hour.
- Imperial Highway and Main Street (Intersection #68) during the construction p.m. peak hour.
- Imperial Highway and Pershing Drive (Intersection #69) during the construction a.m. peak hour.
- Sepulveda Boulevard and Manchester Avenue (Intersection #114) during the construction p.m. peak hour.

As indicated in Table 4.3-15 on page 4-222 of the Bradley West Project Draft EIR, the project would also contribute to cumulatively considerable impacts at these same intersections under Scenarios 3 and 4; however, relative to Scenario 3, the impacts associated with Scenario 1 would occur to a lesser degree. This reduced impact with Scenario 1, as compared to Scenario 3, is to be expected given that Scenario 3 activity is much greater, comprised of the same level of traffic activity accessing the Northwest Construction Staging/Parking Area as Scenario 1, plus additional traffic accessing the secondary site at the Southeast Construction Staging/Parking Area.

As shown in Table 2 it is anticipated that under Scenario 2, only one intersection would experience cumulative impacts where the project-component would be cumulatively considerable:

- La Cienega Boulevard and Century Boulevard (Intersection #36) during the construction p.m. peak hour.

Under Scenario 2, three fewer intersections would be impacted than under the other three scenarios. This is because under Scenario 2, all construction employee parking is assumed to be provided at the East Contractor Employee Parking Area and/or the Southeast Construction Staging/Parking Area, whereas, under Scenario 4, the East Contractor Employee Parking Area and/or the Southeast Construction Staging/Parking Area would be used to the same level of activity as Scenario 2 plus additional "surged" traffic would be assigned to the Northwest Construction Staging/Parking Area. This Scenario 4 condition with the use of the Northwest Construction Staging/Parking Area would produce additional traffic using the intersections along Imperial Highway and along Sepulveda Boulevard north of the airport resulting in additional impacts under Scenario 4 as compared with Scenario 2. For reference, the impacts associated with Scenario 4 are provided in Table 4.3-16 on page 4-224 of the Bradley West Project Draft EIR.

Table 3 provides an overall summary of intersections that are estimated to experience cumulative impacts where the project component would be cumulatively considerable. For purposes of comparison, all four scenarios are included in this table.

As described above, the Bradley West Project would result in significant construction traffic-related impacts under the Scenario 1 and Scenario 2 traffic conditions. LAWA developed a mitigation program that, if implemented, would mitigate construction impacts at two of the impacted intersections (i.e., Imperial Highway and Main Street (Intersection #68), and Imperial Highway and Pershing Drive (Intersection #69). These mitigation measures are described in detail in Section 4.3.9 of the Bradley West Project Draft EIR. Table 4 summarizes the final level of service if all potential intersection improvements (both feasible and infeasible) were implemented, based on the anticipated traffic activity for the Scenario 1 and Scenario 2 traffic conditions. For purposes of comparison, Scenarios 3 and 4 are also included in this table. As shown in Table 4, under the 2010 With Project (With Improvements) condition the level of service with the improvements in place is shown to be better than under the unimproved 2010 Without Project condition. With the improvements in place, the impacts at the intersections of Imperial Highway and Main Street (Intersection #68), and Imperial Highway and Pershing Drive (Intersection #69), would be less than significant. As with Scenarios 3 and 4, physical constraints adjacent to the other two intersections--La Cienega Boulevard and Century Boulevard (Intersection #36) and Sepulveda Boulevard and Manchester Avenue (Intersection #114)--would render potential improvements infeasible. As a result, impacts to these intersections would be significant and unavoidable.

The final level of service after implementing the recommended transportation mitigation plan as outlined in Section 4.3.9 of the Bradley West Project Draft EIR (page 4-228), which includes only feasible mitigation measures, is summarized in Table 5. As discussed in greater detail under Response to Comment BWP-AL00001-21, the analyses summarized in Table 5 were prepared using the methodologies and procedures documented in Section 4.3.2 beginning on page 4-170 of the Bradley West Project Draft EIR. Specifically, the intersections were analyzed to assess intersection operations both with and without the improvements in place. For purposes of comparison, Scenarios 3 and 4 results are also included in this table.

Based on the analysis presented, the mitigation measures identified in Section 4.3.9 of the Bradley West Project Draft EIR would also be required under Scenario 1 to mitigate projected impacts. Under Scenario 2, however, it is estimated that the intersections of Imperial Highway and Main Street (Intersection #68) and Imperial Highway and Pershing Drive (Intersection #69) would not experience significant impacts as a result of the project and, therefore, mitigation would not be required for this scenario.

Table 4.3-18 on page 4-232 and Table 4.3-19 on page 4-233 of the Bradley West Project Draft EIR have been updated to incorporate additional information and revised headings for consistency with the similar tables presented in this response. Please see Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR.

Table 1

Level of Service Analysis Results - Impact Comparison 2 Cumulative Traffic (Scenario 1, Fourth Quarter 2010)

			Baseline (2008) [A]		Bradley West Project Peak (Q4 2010) Without Project		With Project[1] [C]		Cumulative Impact Determination [C]-[A]		Cumulative Considerable Determination/Significant Impact [C]-[B]	
	Intersection	Peak Hour[1]	V/C[2]	LOS[3]	V/C[2]	LOS[3]	V/C[2]	LOS[3]	Change in V/C	Cumulative Impact?	Change in V/C	Cumulatively Considerable Contribution?
14.	Aviation Boulevard and Century Boulevard	Construction AM	0.469	A	0.522	A	0.522	A	0.053	--[4]	0.000	--
		Construction PM	0.757	C	0.815	D	0.815	D	0.058	Yes	0.000	--
16.	Imperial Highway and Aviation Boulevard	Construction AM	0.523	A	0.591	A	0.591	A	0.068	--	0.000	--
		Construction PM	0.667	B	0.729	C	0.764	C	0.097	Yes	0.035	--
19.	Aviation Boulevard and 111th Street	Construction AM	0.353	A	0.397	A	0.397	A	0.044	--	0.000	--
		Construction PM	0.488	A	0.531	A	0.531	A	0.043	--	0.000	--
36.	La Cienega Boulevard and Century Boulevard	Construction AM	0.392	A	0.415	A	0.415	A	0.023	--	0.000	--
		Construction PM	0.910	E	0.958	E	0.969	E	0.059	Yes	0.011	Yes
39.	Century Boulevard and I-405 Northbound Ramp	Construction AM	0.514	A	0.540	A	0.544	A	0.030	--	0.004	--
		Construction PM	0.548	A	0.574	A	0.577	A	0.029	--	0.003	--
47.	Imperial Highway and Douglas Street	Construction AM	0.155	A	0.174	A	0.214	A	0.059	--	0.040	--
		Construction PM	0.412	A	0.439	A	0.475	A	0.063	--	0.036	--
65.	Sepulveda Boulevard and Howard Hughes Parkway	Construction AM	0.256	A	0.269	A	0.269	A	0.013	--	0.000	--
		Construction PM	0.643	B	0.672	B	0.672	B	0.029	--	0.000	--
67.	Imperial Highway and La Cienega Boulevard	Construction AM	0.220	A	0.242	A	0.243	A	0.023	--	0.001	--
		Construction PM	0.568	A	0.605	B	0.605	B	0.037	--	0.000	--
68.	Imperial Highway and Main Street	Construction AM	0.405	A	0.426	A	0.431	A	0.026	--	0.005	--
		Construction PM	0.716	C	0.801	D	0.912	E	0.196	Yes	0.111	Yes
69.	Imperial Highway and Pershing Drive	Construction AM	0.481	A	0.537	A	0.761	C	0.280	Yes	0.224	Yes
		Construction PM	0.434	A	0.472	A	0.594	A	0.160	--	0.122	--
71.	Imperial Highway and Sepulveda Boulevard	Construction AM	0.509	A	0.533	A	0.533	A	0.024	--	0.000	--
		Construction PM	1.185	F	1.237	F	1.237	F	0.052	Yes	0.000	--
73.	Imperial Highway and Nash Street	Construction AM	0.377	A	0.395	A	0.523	A	0.146	--	0.128	--
		Construction PM	0.300	A	0.324	A	0.359	A	0.059	--	0.035	--
74.	Imperial Highway and I-105 Ramp	Construction AM	0.533	A	0.586	A	0.633	B	0.100	--	0.047	--
		Construction PM	0.541	A	0.580	A	0.604	B	0.063	--	0.024	--
75.	Imperial Highway and I-405 Northbound Ramp	Construction AM	0.246	A	0.280	A	0.310	A	0.064	--	0.030	--
		Construction PM	0.554	A	0.589	A	0.618	B	0.064	--	0.029	--
89.	La Cienega Boulevard and Lennox Boulevard	Construction AM	0.224	A	0.236	A	0.236	A	0.012	--	0.000	--
		Construction PM	0.408	A	0.427	A	0.427	A	0.019	--	0.000	--
94.	La Cienega Boulevard and 111th Street	Construction AM	0.122	A	0.130	A	0.130	A	0.008	--	0.000	--
		Construction PM	0.363	A	0.381	A	0.381	A	0.018	--	0.000	--
96.	La Cienega Blvd. & I-405 South-bound Ramps North of Century	Construction AM	0.442	A	0.481	A	0.481	A	0.039	--	0.000	--
		Construction PM	0.560	A	0.597	A	0.599	A	0.039	--	0.002	--

Table 1

Level of Service Analysis Results - Impact Comparison 2 Cumulative Traffic (Scenario 1, Fourth Quarter 2010)

			Baseline (2008) [A] [B]		Bradley West Project Peak (Q4 2010) Without Project		With Project[1] [C]		Cumulative Impact Determination [C]-[A]		Cumulative Considerable Determination/Significant Impact [C]-[B]	
	Intersection	Peak Hour[1]	V/C[2]	LOS[3]	V/C[2]	LOS[3]	V/C[2]	LOS[3]	Change in V/C	Cumulative Impact?	Change in V/C	Cumulatively Considerable Contribution?
97.	La Cienega Blvd. & I-405 South-bound Ramps South of Century	Construction AM	0.238	A	0.250	A	0.250	A	0.012	--	0.000	--
		Construction PM	0.424	A	0.458	A	0.458	A	0.034	--	0.000	--
98.	La Cienega Blvd. & I-405 South-bound Ramps North of Imperial	Construction AM	0.173	A	0.182	A	0.182	A	0.009	--	0.000	--
		Construction PM	0.279	A	0.292	A	0.292	A	0.013	--	0.000	--
101.[5]	Sepulveda Boulevard and La Tijera Boulevard	Construction AM	0.377	A	0.377	A	0.377	A	0.000	--	0.000	--
		Construction PM	0.663	B	0.663	B	0.667	B	0.004	--	0.004	--
108.	Sepulveda Boulevard and Lincoln Boulevard	Construction AM	0.409	A	0.429	A	0.429	A	0.020	--	0.000	--
		Construction PM	0.715	C	0.750	C	0.760	C	0.045	Yes	0.010	--
114.[5]	Sepulveda Boulevard and Manchester Avenue	Construction AM	0.501	A	0.515	A	0.515	A	0.014	--	0.000	--
		Construction PM	0.877	D	0.902	E	0.933	E	0.056	Yes	0.031	Yes
123.	Westchester Parkway and Pershing Drive	Construction AM	0.212	A	0.228	A	0.415	A	0.203	--	0.187	--
		Construction PM	0.255	A	0.269	A	0.475	A	0.220	--	0.206	--
135.[5]	Sepulveda Boulevard and Westchester Parkway	Construction AM	0.331	A	0.351	A	0.351	A	0.020	--	0.000	--
		Construction PM	0.636	B	0.644	B	0.657	B	0.021	--	0.013	--
136.[5]	Sepulveda Boulevard and 76th/77th Street	Construction AM	0.510	A	0.531	A	0.531	A	0.021	--	0.000	--
		Construction PM	0.552	A	0.552	A	0.552	A	0.000	--	0.000	--
137.	Sepulveda Boulevard and 79th/80th Street	Construction AM	0.421	A	0.441	A	0.441	A	0.020	--	0.000	--
		Construction PM	0.508	A	0.533	A	0.540	A	0.032	--	0.007	--
138.	Sepulveda Boulevard and 83rd Street	Construction AM	0.308	A	0.323	A	0.323	A	0.015	--	0.000	--
		Construction PM	0.459	A	0.481	A	0.488	A	0.029	--	0.007	--
1000.	La Cienega Boulevard and 104th Street	Construction AM	0.154	A	0.156	A	0.157	A	0.003	--	0.001	--
		Construction PM	0.356	A	0.373	A	0.373	A	0.017	--	0.000	--

[1] The hours of analysis include the construction a.m. peak (6:00 a.m. - 7:00 a.m.) and the construction p.m. peak (3:30 p.m. - 4:30 p.m.).
[2] Volume to capacity ratio. Includes an LADOT ATSAC benefit applied at each intersection with the exception of intersections #39 and #75, which are not a part of the LADOT system
[3] Level of Service range: A (excellent) to F (failure).
[4] -- Indicates "No Impact"
[5] The Bradley West Project With and Without Project scenarios level of service were calculated to include the widening of Sepulveda Boulevard that was completed subsequent to publication of the NOP for the Bradley West Project Draft EIR.

Source: Ricondo & Associates, Inc., using TRAFFIX, 2009.

Table 2

Level of Service Analysis Results - Impact Comparison 2 Cumulative Traffic (Scenario 2, Fourth Quarter 2010)

			Baseline (2008) [A] [B]		Bradley West Project Peak (Q4 2010) Without Project		With Project[1] [C]		Cumulative Impact Determination [C]-[A]		Cumulative Considerable Determination/Significant Impact [C]-[B]	
	Intersection	Peak Hour[1]	V/C[2]	LOS[3]	V/C[2]	LOS[3]	V/C[2]	LOS[3]	Change in V/C	Cumulative Impact?	Change in V/C	Cumulatively Considerable Contribution?
14.	Aviation Boulevard and Century Boulevard	Construction AM	0.469	A	0.522	A	0.522	A	0.053	--[4]	0.000	--
		Construction PM	0.757	C	0.815	D	0.827	D	0.070	Yes	0.012	--
16.	Imperial Highway and Aviation Boulevard	Construction AM	0.523	A	0.591	A	0.627	B	0.104	--	0.036	--
		Construction PM	0.667	B	0.729	C	0.736	C	0.069	Yes	0.007	--
19.	Aviation Boulevard and 111th Street	Construction AM	0.353	A	0.397	A	0.439	A	0.086	--	0.042	--
		Construction PM	0.488	A	0.531	A	0.569	A	0.081	--	0.038	--
36.	La Cienega Boulevard and Century Boulevard	Construction AM	0.392	A	0.415	A	0.415	A	0.023	--	0.000	--
		Construction PM	0.910	E	0.958	E	0.986	E	0.076	Yes	0.028	Yes
39.	Century Boulevard and I-405 Northbound Ramp	Construction AM	0.514	A	0.540	A	0.544	A	0.030	--	0.004	--
		Construction PM	0.548	A	0.574	A	0.577	A	0.029	--	0.003	--
47.	Imperial Highway and Douglas Street	Construction AM	0.155	A	0.174	A	0.181	A	0.026	--	0.007	--
		Construction PM	0.412	A	0.439	A	0.447	A	0.035	--	0.008	--
65.	Sepulveda Boulevard and Howard Hughes Parkway	Construction AM	0.256	A	0.269	A	0.269	A	0.013	--	0.000	--
		Construction PM	0.643	B	0.672	B	0.676	B	0.033	--	0.004	--
67.	Imperial Highway and La Cienega Boulevard	Construction AM	0.220	A	0.242	A	0.279	A	0.059	--	0.037	--
		Construction PM	0.568	A	0.605	B	0.637	B	0.069	--	0.032	--
68.	Imperial Highway and Main Street	Construction AM	0.405	A	0.426	A	0.441	A	0.036	--	0.015	--
		Construction PM	0.716	C	0.801	D	0.814	D	0.098	Yes	0.013	--
69.	Imperial Highway and Pershing Drive	Construction AM	0.481	A	0.537	A	0.566	A	0.085	--	0.029	--
		Construction PM	0.434	A	0.472	A	0.487	A	0.053	--	0.015	--
71.	Imperial Highway and Sepulveda Boulevard	Construction AM	0.509	A	0.533	A	0.551	A	0.042	--	0.018	--
		Construction PM	1.185	F	1.237	F	1.241	F	0.056	Yes	0.004	--
73.	Imperial Highway and Nash Street	Construction AM	0.377	A	0.395	A	0.408	A	0.031	--	0.013	--
		Construction PM	0.300	A	0.324	A	0.332	A	0.032	--	0.008	--
74.	Imperial Highway and I-105 Ramp	Construction AM	0.533	A	0.586	A	0.591	A	0.058	--	0.005	--
		Construction PM	0.541	A	0.580	A	0.651	B	0.110	--	0.071	--
75.	Imperial Highway and I-405 Northbound Ramp	Construction AM	0.246	A	0.280	A	0.328	A	0.082	--	0.048	--
		Construction PM	0.554	A	0.589	A	0.605	B	0.051	--	0.016	--
89.	La Cienega Boulevard and Lennox Boulevard	Construction AM	0.224	A	0.236	A	0.236	A	0.012	--	0.000	--
		Construction PM	0.408	A	0.427	A	0.427	A	0.019	--	0.000	--
94.	La Cienega Boulevard and 111th Street	Construction AM	0.122	A	0.130	A	0.318	A	0.196	--	0.188	--
		Construction PM	0.363	A	0.381	A	0.607	B	0.244	--	0.226	--
96.	La Cienega Blvd. & I-405 South-bound Ramps North of Century	Construction AM	0.442	A	0.481	A	0.520	A	0.078	--	0.039	--
		Construction PM	0.560	A	0.597	A	0.615	B	0.055	--	0.018	--

Table 2

Level of Service Analysis Results - Impact Comparison 2 Cumulative Traffic (Scenario 2, Fourth Quarter 2010)

			Baseline (2008) [A]		Bradley West Project Peak (Q4 2010) Without Project		With Project[1] [C]		Cumulative Impact Determination [C]-[A]		Cumulative Considerable Determination/Significant Impact [C]-[B]	
	Intersection	Peak Hour[1]	V/C[2]	LOS[3]	V/C[2]	LOS[3]	V/C[2]	LOS[3]	Change in V/C	Cumulative Impact?	Change in V/C	Cumulatively Considerable Contribution?
97.	La Cienega Blvd. & I-405 South-bound Ramps South of Century	Construction AM	0.238	A	0.250	A	0.250	A	0.012	--	0.000	--
		Construction PM	0.424	A	0.458	A	0.499	A	0.075	--	0.041	--
98.	La Cienega Blvd. & I-405 South-bound Ramps North of Imperial	Construction AM	0.173	A	0.182	A	0.182	A	0.009	--	0.000	--
		Construction PM	0.279	A	0.292	A	0.292	A	0.013	--	0.000	--
101.[5]	Sepulveda Boulevard and La Tijera Boulevard	Construction AM	0.377	A	0.377	A	0.377	A	0.000	--	0.000	--
		Construction PM	0.663	B	0.663	B	0.663	B	0.000	--	0.000	--
108.	Sepulveda Boulevard and Lincoln Boulevard	Construction AM	0.409	A	0.429	A	0.429	A	0.020	--	0.000	--
		Construction PM	0.715	C	0.750	C	0.751	C	0.036	--	0.001	--
114.[5]	Sepulveda Boulevard and Manchester Avenue	Construction AM	0.501	A	0.515	A	0.515	A	0.014	--	0.000	--
		Construction PM	0.877	D	0.902	E	0.909	E	0.032	Yes	0.007	--
123.	Westchester Parkway and Pershing Drive	Construction AM	0.212	A	0.228	A	0.233	A	0.021	--	0.005	--
		Construction PM	0.255	A	0.269	A	0.269	A	0.014	--	0.000	--
135.[5]	Sepulveda Boulevard and Westchester Parkway	Construction AM	0.331	A	0.351	A	0.351	A	0.020	--	0.000	--
		Construction PM	0.636	B	0.644	B	0.658	B	0.022	--	0.014	--
136.[5]	Sepulveda Boulevard and 76th/77th Street	Construction AM	0.510	A	0.531	A	0.531	A	0.021	--	0.000	--
		Construction PM	0.552	A	0.552	A	0.552	A	0.000	--	0.000	--
137.	Sepulveda Boulevard and 79th/80th Street	Construction AM	0.421	A	0.441	A	0.441	A	0.020	--	0.000	--
		Construction PM	0.508	A	0.533	A	0.535	A	0.027	--	0.002	--
138.	Sepulveda Boulevard and 83rd Street	Construction AM	0.308	A	0.323	A	0.323	A	0.015	--	0.000	--
		Construction PM	0.459	A	0.481	A	0.482	A	0.023	--	0.001	--
1000.	La Cienega Boulevard and 104th Street	Construction AM	0.154	A	0.156	A	0.161	A	0.007	--	0.005	--
		Construction PM	0.356	A	0.373	A	0.374	A	0.018	--	0.001	--

1 The hours of analysis include the construction a.m. peak (6:00 a.m. - 7:00 a.m.) and the construction p.m. peak (3:30 p.m. - 4:30 p.m.).
2 Volume to capacity ratio. Includes an LADOT ATSAC benefit applied at each intersection with the exception of intersections #39 and #75, which are not a part of the LADOT system
3 Level of Service range: A (excellent) to F (failure).
4 -- Indicates "No Impact"
5 The Bradley West Project With and Without Project scenarios level of service were calculated to include the widening of Sepulveda Boulevard that was completed subsequent to publication of the NOP for the Bradley West Project Draft EIR.

Source: Ricondo & Associates, Inc., using TRAFFIX, 2009.

Table 3

Level of Service Analysis Results Summary -
Impact Comparison 2 Cumulative Traffic at Bradley West Project Peak
(Cumulative Considerable Determination, 4th Quarter 2010)

Intersection	Peak Hour[1]	Scenario 1[2]	Scenario 2[3]	Scenario 3[4]	Scenario 4[5]
36. La Cienega Blvd and Century Blvd	Construction AM	--[6]	--	--	--
	Construction PM	Yes	Yes	Yes	Yes
68. Imperial Highway and Main Street	Construction AM	--	--	--	--
	Construction PM	Yes	--	Yes	Yes
69. Imperial Highway and Pershing Drive	Construction AM	Yes	--	Yes	Yes
	Construction PM	--	--	--	--
114. Sepulveda Blvd and Manchester Ave	Construction AM	--	--	--	--
	Construction PM	Yes	--	Yes	Yes

[1] The hours of analysis include the construction a.m. peak (6:00 a.m. - 7:00 a.m.), and the construction p.m. peak (3:30 p.m. - 4:30 p.m.).
[2] Scenario 1: 601 trips allocated to the Northwest Parking Area (located on Westchester Parkway at Pershing Drive).
[3] Scenario 2: 601 trips allocated to the Southeast Parking Area (located on La Cienega Boulevard at Lennox Boulevard).
[4] Scenario 3: 357 trips allocated to the Southeast Parking Area (located at Continental City) and 601 trips allocated to the Northwest Parking Area.
[5] Scenario 4: 601 trips allocated to the Southeast Parking Area (located at Continental City) and 357 trips allocated to the Northwest Parking Area.
[6] -- Indicates "No Impact"

Source: Ricondo & Associates, Inc., 2009.

Table 4

Level of Service With Potential Intersection Improvements

Intersection Number	Peak Hour	Intersec tion	Improvements	Affected Scenario	2010 Without Project (Without Improvements) V/C [A]	LOS	2010 With Project (Without Improvements) V/C	LOS	2010 With Project (With Improvements) V/C [B]	LOS	Cumulatively Considerable Determination/Significant Impact Change in V/C [B] - [A]	Cumulatively Considerable Contribution
#36	PM	La Cienega and Century	Improvements for this impact would involve 1) widening Century to the south for the addition of a right-turn lane on the west leg of the intersection and 2) restriping the WB approach with a resulting lane configuration of WB - 1 LT, 3 TH, 1 RT.[2]	Scenario 1	0.958	E	0.969	E	0.783	C[1]	-0.175	NA[1]
				Scenario 2	0.958	E	0.986	E	0.800	C[1]	-0.158	NA[1]
				Scenario 3	0.958	E	0.973	E	0.787	C[1]	-0.171	NA[1]
				Scenario 4	0.958	E	0.986	E	0.800	C[1]	-0.158	NA[1]
#68	PM	Imperial and Main	Mitigation for this impact involves narrowing the median island on the east leg of the intersection for the addition of a second left-turn lane.	Scenario 1	0.801	D	0.912	E	0.764	C	-0.037	No
				Scenario 2	0.801	D	0.814	D	0.637	B	-0.164	No
				Scenario 3	0.801	D	0.921	E	0.774	C	-0.027	No
				Scenario 4	0.801	D	0.881	D	0.732	C	-0.069	No
#69	AM	Imperial and Pershing	Mitigation for this impact involves widening Imperial to the north for the addition of a right-turn lane on the east leg of the intersection. Resulting lane configuration is WB - 1 LT, 2 TH, 2 RT.	Scenario 1	0.537	A	0.761	C	0.232	A	-0.305	No
				Scenario 2	0.537	A	0.566	A	0.243	A	-0.294	No
				Scenario 3	0.537	A	0.782	C	0.244	A	-0.293	No
				Scenario 4	0.537	A	0.702	C	0.248	A	-0.289	No
#114	PM	Sepulveda and Manchester	Improvements for this impact would involve widening Sepulveda to the west for the addition of a left-turn lane on the north leg of the intersection.	Scenario 1	0.902	E	0.933	E	0.852	D[1]	-0.050	NA[1]
				Scenario 2	0.902	E	0.909	E	0.827	D[1]	-0.075	NA[1]
				Scenario 3	0.902	E	0.937	E	0.856	D[1]	-0.046	NA[1]
				Scenario 4	0.902	E	0.927	E	0.846	D[1]	-0.056	NA[1]

[1] Although potential intersection improvements would reduce the impacts at this intersection, the improvements are not considered to be feasible.

[2] WB = westbound, LT - left-turn lane, TH = through lane, RT = right-turn lane

Source: Ricondo & Associates, Inc., using TRAFFIX, 2009.

Table 5

Construction-Related Impacts With Mitigation Program

				2010 Without Project (Without Improvements)		2010 With Project (With Mitigation Program)		Cumulatively Considerable Determination/ Significant Impact	
Intersection Number	Peak Hour	Intersection	Affected Scenario	V/C [A]	LOS	V/C [B]	LOS	Change in V/C [B] - [A]	Cumulatively Considerable Contribution
#36	PM	La Cienega and Century	Scenario 1	0.958	E	0.969	E	0.011	Yes[1]
			Scenario 2	0.958	E	0.986	E	0.028	Yes[1]
			Scenario 3	0.958	E	0.973	E	0.015	Yes[1]
			Scenario 4	0.958	E	0.986	E	0.028	Yes[1]
#68	PM	Imperial and Main	Scenario 1	0.801	D	0.764	C	-0.037	No
			Scenario 2	0.801	D	0.637	B	-0.164	No
			Scenario 3	0.801	D	0.774	C	-0.027	No
			Scenario 4	0.801	D	0.732	C	-0.069	No
#69	AM	Imperial and Pershing	Scenario 1	0.537	A	0.232	A	-0.305	No
			Scenario 2	0.537	A	0.243	A	-0.294	No
			Scenario 3	0.537	A	0.244	A	-0.293	No
			Scenario 4	0.537	A	0.248	A	-0.289	No
#114	PM	Sepulveda and Manchester	Scenario 1	0.902	E	0.933	E	0.031	Yes[1]
			Scenario 2	0.902	E	0.909	E	0.007	No[2]
			Scenario 3	0.902	E	0.937	E	0.035	Yes[1]
			Scenario 4	0.902	E	0.927	E	0.025	Yes[1]

[1] Although potential intersection improvements would reduce the impacts at this intersection, improvements are not considered to be feasible.
[2] Impacts under this scenario would not be significant and do not require mitigation.

Source: Ricondo & Associates, Inc., using TRAFFIX, 2009.

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Comment: Both of the significant construction traffic impacts identified in the DEIR are relevant to El Segundo: Imperial Highway and Main Street (Intersection #68) and Imperial Highway and Pershing Drive (Intersection #69). The proposed mitigation for these intersections is described as feasible and is predicted to reduce the impact to a less-than-significant level. (DEIR at 4-228.) However, the DEIR does not present any evidence that this mitigation would be sufficient, and fails to analyze any potential indirect impacts of the recommended mitigation measures. Please correct these deficiencies.

Response: Table 4.3-18 on page 4-232 of the Bradley West Project Draft EIR delineates the 2010 level of service for each of the two subject intersections (i.e., Imperial Highway and Main Street [Intersection #68] and Imperial Highway and Pershing Drive [Intersection #69]) under the With Project condition for both the existing geometry and the improved conditions with the proposed mitigation. The analyses summarized in Table 4.3-18 were prepared using the methodologies and procedures documented in Section 4.3.2 beginning on page 4-170 of the Bradley West Project Draft EIR. Specifically, the intersections were analyzed to assess intersection operations both with and without the improvements in place. The intersection of Imperial Highway and Main Street would be improved by constructing a second left-turn lane within the median to accommodate traffic from westbound Imperial Highway to Main Street. The intersection of Imperial Highway and Pershing Drive would be improved by widening the north side of the westbound approach to provide an additional right-turn lane from westbound Imperial Highway to Pershing Drive. As shown in the table, it is anticipated that the intersection of Imperial Highway and Main Street would operate at LOS C with the improvements in place as compared to LOS D conditions that would be expected without the project and without the improvements. The intersection of Imperial Highway and Pershing Drive would operate at LOS A with the improvements in place. Implementation of these improvements would reduce the impact to a less than significant level for all construction parking demand scenarios analyzed in the Bradley West Project Draft EIR.

The future levels of service at each intersection with the recommended improvements in place were calculated using the same analysis procedures that were used in the determination of project impacts. Specifically, the intersection analysis is based on Transportation Research Board Circular 212 Planning Method for analysis of signalized intersections. The detailed level of service calculations for the anticipated 2010 With Project (With Improvements) traffic conditions provided in Table 4.3-18 of the Bradley West Project Draft EIR were not included in Appendix D of the Bradley West Project Draft EIR. Please see Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR, which includes the subject level of service calculations that were not included as part of Appendix D of the Bradley West Project Draft EIR.

With regard to indirect impacts associated with the mitigation measures MM-ST (BWP)-10 and MM-ST (BWP)-11 discussed in Section 4.3.9, the construction of the specified intersection improvements would result in localized inconvenience due to temporary lane narrowing and/or lane closures for westbound (and possibly eastbound) traffic on Imperial Highway at Main Street and for westbound traffic on Imperial Highway at Pershing Drive to provide adequate room to construct the additional turn lanes, integrate these new lanes with the adjacent lanes, and modify drainage facilities as required. Detailed design will determine the overall schedule for completion of these improvements, however, it is anticipated that the improvements would require from approximately four to six weeks in schedule duration. This includes the drainage and signal system work, much of which could be accomplished outside of the active roadway to minimize disruption to traffic operations. In addition, there would be localized and short-term generation of construction-related air pollutant emissions from equipment operations, worker commute, materials deliveries, and ground disturbance. Noise associated with the construction of these intersection lane improvements would be generated; however, based on the distance between the proposed intersection improvements and the nearest noise-sensitive (residential) receptors (i.e., approximately 500 feet for the improvements at Imperial Highway/Pershing Drive and approximately 300 feet for the improvements at Imperial Highway/Main Street), and the relatively low level of construction activity associated with the proposed improvements, it is not anticipated that associated noise would significantly affect noise-sensitive receptors. Furthermore, the act of constructing the intersection improvements would generate limited local construction traffic activity associated with site preparation and construction-related deliveries. In accordance with LAX Master

Plan Commitment ST-18, a Construction Traffic Management Plan (CTMP) must be submitted by the Bradley West Project contractor to LAWA at the beginning of the project. The CTMP will include detailed worksite traffic control plans to minimize the effect on traffic flow during the construction of these improvements. As part of the CTMP, the contractor will designate active construction periods and will, to the extent feasible, limit construction activity and lane closures to the non-peak periods in order to reduce traffic related congestion and delays associated with construction. As noted above, implementation of the left-turn lane addition at the Imperial Highway and Main Street intersection would result in minor alterations to existing drainage facilities. Currently, stormwater traverses the landscaped median along Imperial Highway in a westerly direction, entering four culvert inlets under the Imperial Highway/Main Street intersection. The installation of the second turn lane would require extending the two northerly inlets beneath the new lane and redirecting the flow to these inlets via a side drain along the southerly edge of the new lane. Although this measure would redirect stormwater flows, there would be no impact to stormwater volumes, flow rates or water quality as a result of this mitigation measure. Drainage plans will be designed and approved as part of the civil engineering plans required for this intersection improvement. As an unrelated project, the City of Los Angeles Department of Public Works, Bureau of Sanitation is currently undertaking the Imperial Highway Sunken Median Project, which will retrofit a stretch of Imperial Highway west of Sepulveda Boulevard to Pershing Drive by installing a sunken median with a vegetated swale that will act as an infiltration bioretention to treat dry and wet weather flows. This project will improve water quality associated with stormwater flows along Imperial Highway, including the area of the proposed intersection improvements.1 This project has been added to the list of related projects in Table 3-1 and Table 4.25 of the Bradley West Project Draft EIR. Please see Chapter 3, Corrections and Additions to the Brady West Project Draft EIR. The temporary and short-term nature of indirect impacts associated with air quality, noise, and construction traffic noted above, with application of measures identified through the CTMP, would be less than significant. As indicated, no impacts to drainage or water quality would occur from implementation of the proposed mitigation measures. Moreover, the intersection improvements would not have any impacts on other resources.

1. Integrated Regional Water Management Plan for the Santa Monica Bay Watershed, Draft Plan Version 1, March 2005.

BWP-AL00001-22

Comment: The following sentence appears on page 4-228 of the DEIR: "As stated in Section 4.3.8.2 above, neither of these mitigation measures would be needed under employee parking Scenario 2." Our review of Section 4.3.8.2 indicates that it does not so state. Please correct this. In any event, even if the impacts are somewhat less under Scenario 2, LAWA should still implement the identified mitigation measures.

Response: The following sentence currently appears on page 4-228 of the Draft EIR: "As stated in Section 4.3.8.2 above, neither of these mitigation measures would be needed under employee parking Scenario 2." This sentence should instead read: "As stated in Section 4.3.8.1 above, neither of these mitigation measures would be needed under employee parking Scenario 2." Page 4-228 of the Bradley West Project Draft EIR has been revised accordingly. Please see Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR.

Furthermore, the commentor states that LAWA should implement the identified mitigation measures even if the impacts are somewhat less under Scenario 2. As described in Section 4.3.8.2 of the Bradley West Project Draft EIR, the traffic conditions for Scenario 3 and 4 represent the worst-case conditions for assessment of intersections within the study area. As a result, all mitigation measures identified under Scenario 3 and/or 4 will fully mitigate impacts under Scenario 1 and/or 2. Furthermore, LAWA proposes to implement the recommended mitigation measures for the worst-case scenario of Scenario 3 and/or 4.

Please see Response to Comment BWP-AL00001-20 regarding the request for additional information on the results of the analysis for Scenarios 1 and 2.

BWP-AL00001-23

Comment: Air Quality Impacts: Despite identifying multiple significant air quality impacts stemming from both construction and operational stages of the Project (DEIR at 4-269), the DEIR proposes no project-specific mitigation measures for these air quality impacts. (DEIR at 4-274.) Instead, the DEIR relies on two mitigation measures identified for the LAX Master Plan, MM-AQ-1 (LAX Master Plan - Mitigation Plan for Air Quality) and MM-AQ-2 (Construction-Related Measure). (DEIR at 4-254.) LAWA must ensure that these two measures are enforceable conditions of the Bradley West Project - as it currently stands, it is not clear that these measures are required to be incorporated into the Bradley West Project. Moreover, the status of the Master Plan - Mitigation Plan for Air Quality in unclear. The Bradley West DEIR states that LAWA is still working to define the framework of this plan (DEIR at 4-254) but page 20 of the 2008 LAX Master Plan Annual Progress Report states that the Mitigation Plan for Air Quality was completed in December 2005. Neither document sheds any light on what this Mitigation Plan for Air Quality might include. Thus, it is inappropriate for the Bradley West DEIR to rely on a vague "plan to plan" as one of only two mitigation measures for air quality. Instead, specific measures should be identified in this EIR to mitigate this Project's air quality impacts.

Response: The mitigation measures do not rely on a "plan to plan" analysis. Mitigation for air quality impacts associated with all LAX Master Plan projects were identified in the LAX Master Plan EIS/EIR. The LAX Master Plan required, under MM-AQ-1, that LAWA develop a Mitigation Plan for Air Quality (MPAQ) that would apply to all Master Plan projects. Initially, the MPAQ would present the basic framework of the overall air quality mitigation program (basic LAX MP-MPAQ); ultimately, the full LAX MP-MPAQ will define specific measures to be implemented within the context of three individual components specific to the categories of emissions associated with the Master Plan, namely, construction, transportation and operations. The basic LAX MP-MPAQ was adopted by the Board of Airport Commissioners in December 2005. In addition, the construction-related element of the MPAQ, which is required by MM-AQ-2, was also adopted by the Board of Airport Commissioners in December 2005. LAWA is currently working to complete the other elements of the full LAX MP-MPAQ, specifically the transportation and operations elements. Page 4-254 of the Bradley West Project Draft EIR has been modified to clarify the status of the LAX MP-MPAQ. Please see Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR.

The components of the construction-related element of the MPAQ, referred to as the Construction-Related Mitigation Plan, include specific actions and measures primarily designed to reduce emissions of fugitive dust and exhaust from on-road and nonroad construction vehicles and equipment. The measures included in the plan fall into the following categories: fugitive dust source controls, on-road mobile source controls, nonroad mobile source controls, stationary point source controls, mobile and stationary source controls, and administrative controls. The Plan includes the statement that "[n]othing in this document exempts, relieves or otherwise defers the construction contractor(s) from adhering to all federal, state and/or local air quality rules, regulations and guidelines." The Plan further specifies that "all the other provisions, requirements and/or activity/source performance criteria of SCAQMD Rule 403 (Fugitive Dust) also apply, including those pertaining to Large Operations and Contingency Control Measures. These measures include (but are not necessarily limited to) the development of a Dust Control Plan, appointment of a qualified dust control supervisor and the timely submissions of appropriate notification forms to SCAQMD."

Section 4.4.5 of the Bradley West Project Draft EIR specifies that LAX Master Plan MM-AQ-1 and MM-AQ-2 apply to the Bradley West Project. The specific measures listed in Tables 4.4-6 and 4.4-7 of the Bradley West Project Draft EIR are drawn from MM-AQ-2 and are required to be implemented as part of the Bradley West Project. To the extent they can be quantified, the results of applying these mitigation measures are included in Section 4.4.6.1 of the Bradley West Project Draft EIR under the "Controlled" heading for emissions and concentrations (beginning on page 4-260). As noted in Section 4.4.5 of the Bradley West Project Draft EIR, the effects of the measures listed in Table 4.4-7 are not readily quantifiable but will result in additional emission reductions beyond those quantified for the measures listed in Table 4.4-6.

Because the Bradley West Project Draft EIR is a tiered EIR, it appropriately relied on mitigation measures developed in the LAX Master Plan process and adopted as conditions of the LAX Master

Plan in reaching its impact conclusions. Pursuant to the LAX Master Plan, measures applicable to LAX Master Plan projects, such as the Bradley West Project, are required to be implemented. Where that is the case for the Bradley West Project, LAWA and the Board of Airport Commissioners will make those measures conditions of approval of the Bradley West Project. Moreover, compliance with these measures, including requirements in MM-AQ-1 and MM-AQ-2, as well as with all of the commitments and mitigation measures associated with the project, will be fully enforceable through the Bradley West Project Mitigation Monitoring and Reporting Program (MMRP), which will be monitored by LAWA or a qualified third party. Compliance with the Bradley West Project MMRP will be documented in LAWA's LAX Master Plan Mitigation Monitoring and Reporting Program Progress Report, which is prepared on an annual basis and available to the public at http://www.ourlax.org/publications.cfm. Additionally, applicable Master Plan mitigation measures related to air quality will be included in the construction contracts for the project.

BWP-AL00001-24

Comment: Noise Impacts: As noted above, El Segundo has requested that LAWA evaluate the impacts on El Segundo associated with the increased preferential runway policy violations that would result from proceeding with the Bradley West Project and thereby encouraging increased use of ADG VI Aircraft (also know as New Large Aircraft or NLA) before the airport has the appropriate airfield facilities to accommodate those NLA. The DEIR Noise chapter responds: "the operation characteristics of NLA at LAX, as related to which runways are used for departures, are based on FAA standards and decisions by the FAA Air Traffic Control Tower (ATCT) completely independent of the Bradley West Project." (DEIR at 4-364.) Apparently, LAWA contends that it need not analyze the potential for increased use of Runway 25L for departures because such use is not within its control. That is not how CEQA works. The lead agency must analyze all reasonably foreseeable consequences of its project, whether or not they are within its control. We reiterate our request that LAWA evaluate and mitigate the impacts on El Segundo associated with the increased preferential runway policy violations that would result from proceeding with the Bradley West Project before the airport has the appropriate airfield facilities.

Response: Noise impacts are not expected to occur as a result of the Bradley West Project's proposed nine ADG VI aircraft gates, over and above that analyzed in the LAX Master Plan EIR, because: (1) the addition of three more gates is not expected to increase the number of New Large Aircraft (NLA) that use LAX, as explained in Response to Comment BWP-AL00001-2 and (2) studies show that the NLA that would use the ADG VI gates produce less noise than the currently operating smaller aircraft. The fact that the FAA controls which runways are used for departures was included in the Bradley West Draft EIR to explain that LAWA cannot control the number of preferential runway policy violations, not to provide support for the conclusion that no noise impacts are expected to occur. See Response to Comment BWP-AL00001-2 and Attachment 2 of this Final EIR for further discussion of this issue.

BWP-AL00001-25

Comment: The DEIR casually mentions in the Noise chapter that a materials processing plant (including a rock crushing plant and a concrete batch plant) "may" be located in the Southeast Construction Staging/Parking Area. (DEIR at 4-376.) It is inappropriate to locate such a loud project component near El Segundo if there are any other locations available. LAWA should not approve this option.

Response: The discussion on page 4-376 acknowledges the potential for a materials processing plant (i.e., rock crushing plant and concrete batch plant) to be operated in the Southeast Construction Staging/Parking Area during the initial phase of project construction. The discussion also quantifies and evaluates potential noise impacts to nearby areas, including the City of El Segundo, and concludes that the impacts would be less than significant.

The City of El Segundo's continued opposition to locating a materials batch plant at this location if there are any other locations available is noted and will be forwarded on to the decision-makers for their consideration.

BWP-AL00001-26

Comment: Alternatives: Thank you for including Alternative 4 (Construction Staging/Parking Areas - Optimize Use of West Construction Staging Area to Include Worker Parking) in the DEIR. El Segundo encourages LAWA to adopt this alternative, which better protects residential neighborhoods from Project impacts.

The DEIR states that if Alternative 4 is adopted, the other staging areas might still be needed occasionally, so this alternative would include a requirement in construction contract documents that workers do not use specified residential streets to access the Northwest Construction Staging/Parking Area. DEIR at 6-10. A requirement that similarly prevents construction workers from using residential streets in El Segundo to access construction staging/parking areas should be included in construction contract documents.

Response: The City of El Segundo's recommendation that LAWA adopt Alternative 4 is noted and will be forwarded on to the decision-makers for their consideration. Please see Topical Response TR-BWP-ST-1 regarding the refinement and additional evaluation of Alternative 4: Construction Staging/Parking Areas-Optimize Use of West Construction Staging Area to Include Worker Parking. This alternative was designed in response to comments received on the NOP and Draft EIR for the Bradley West Project and provides an alternative to the proposed use of the Northwest Construction Staging/Parking Area, the East Contractor Employee Parking Area, or the Southeast Construction Staging/Parking Area as the primary parking area for project construction workers.

BWP-AL00002 Kim, Jay W. City of Los Angeles, Department of Transportation 6/22/2009

BWP-AL00002-1

Comment: The City of Los Angeles Department of Transportation (LADOT) has reviewed the Draft Environmental Impact Report (DEIR) for the Tom Bradley International Terminal (TBIT) Reconfiguration Project, also referred to as the Bradley West Project, at Los Angeles International Airport (LAX) and offers the following comments:

Volume 1 (Main Document), Section 4.2.3.2, page 4-101: Intersection #162 should be changed from Sepulveda Boulevard and Rosecrans Avenue to Sepulveda Boulevard and Manhattan Beach Boulevard.

Response: The typographical error is noted. In response, page 4-101 of the Bradley West Project Draft EIR has been revised. Please see Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR. This revision does not affect the intersection analysis in the Bradley West Project Draft EIR.

BWP-AL00002-2

Comment: Volume 1, Section 4.2.3.2, page 4-102: The intersection of Sepulveda Boulevard and Manhattan Beach Boulevard (Intersection #162) should be added to the exception list for LADOT's Adaptive Traffic Control System (ATCS).

Response: The comment is noted. The intersection of Sepulveda Boulevard and Manhattan Beach Boulevard is not controlled by ATSAC or ATCS and was analyzed without ATSAC or ATCS in the Bradley West Project Draft EIR. In response, page 4-102 of the Bradley West Project Draft EIR has been revised. Please see Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR. This revision does not affect the intersection analysis in the Bradley West Project Draft EIR.

BWP-AL00002-3

Comment: Volume 1, Figure 4.2-3d, Existing (2008) Traffic Volumes: The traffic volume and turning movement diagram for the CMP Arterial Monitoring Station intersection of La Cienega Boulevard and Jefferson Boulevard (Intersection #200) should be added to Figure 4.2-3d. Similar diagrams for this intersection should be added to Figure 4.2-4d ("Future (2013) With Project Traffic Volumes"), Figure 4.2-5d ("Future-Adjusted (2013) Without Project Traffic Volumes") and figures for any other project scenarios where this omission occurs.

Response: The comment is noted. In response, Figure 4.2-3d on page 4-109, Figure 4.2-4d on page 4-143, and Figure 4.2-5d on page 4-151 of the Bradley West Project Draft EIR have been revised. Please see Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR.

BWP-AL00002-4

Comment: Volume 3, Appendix C-3, Aviation Boulevard and Imperial Highway (Intersection #16): The lane configuration for Existing Conditions (Year 2008) for the southbound approach to the Aviation Boulevard and Imperial Highway intersection should be revised to match that shown for Future Conditions (Year 2013) since the lanes have already been reconfigured i.e. the two left-turn lanes, (single) through lane, through/right-turn lane and right-turn lane should be changed to two left-turn lanes, two through lanes and one right turn lane. All intersection capacity analysis effected by this correction should be revised accordingly and corresponding mitigation measures and potential improvements should be identified and evaluated for any anticipated significant impacts.

Response: The lane configuration for Existing Conditions (Year 2008) for the southbound approach to the Aviation Boulevard and Imperial Highway intersection reflects the lane configuration at the time the counts were collected in 2008. As discussed in Section 4.2.3.2 of the Bradley West Project Draft EIR (page 4-102), intersection turning movement counts were collected during the weekday morning, midday (MD) and afternoon time periods at the 71 intersections during July and August 2008. July and August are considered to be the peak months for airport related traffic around LAX and provide a conservative analysis as discussed in Section 4.2.3.2. (See also Bradley West Project Draft EIR pages 4-14, 4-90 and 4-172.) The study area intersections are located in close proximity to the airport and influenced by airport-related traffic activity; therefore, obtaining traffic count information when the airport is operating at peak conditions is important in obtaining a conservative estimate of traffic activity in the study area.

It should be noted that existing (Year 2008) conditions were not used as the basis of the impact analysis for the off-airport surface transportation analysis. As described in Section 4.2.2.1 of the Bradley West Project Draft EIR (page 4-89, Future-Adjusted (2013) Without Project Conditions), the impact analysis followed LADOT traffic analysis guidelines and assumed an "adjusted baseline" that consisted of existing traffic plus traffic from ambient growth and related projects, but no traffic from the proposed project. The adjusted baseline included the referenced reconfiguration and, therefore, this configuration was assumed as part of the baseline condition in the impact analysis, as discussed in Section 4.2.2.1 of the Bradley West Project Draft EIR (page 4-88, Modeling of Future 2013 Conditions) and as shown in Appendix C-3 (Intersection #16). As stated on page 4-88 of the Bradley West Project Draft EIR, "[t]he roadway network was modified to include funded roadway improvement projects to be constructed by 2013, along with roadway improvements that occurred since the counts were collected." Since the lanes were reconfigured after traffic counts were collected, the improvements were assumed for all future (Year 2013) with and without project scenarios. In summary, the intersection capacity analysis for the Aviation Boulevard and Imperial Highway intersection is not affected by the fact that the lane reconfiguration occurred subsequent to the traffic counts; thus, no revisions to the analysis or mitigation plan are required. The analysis and conclusions regarding significant impacts and corresponding mitigation measures presented in the Bradley West Project Draft EIR remain valid.

BWP-AL00002-5

Comment: Volume 3, Appendix C-3, Sepulveda Boulevard and Imperial Highway (Intersection #71): The lane configuration for Existing Conditions (Year 2008) for the westbound approach to the Sepulveda Boulevard and Imperial Highway intersection should be revised to match that shown for Future Conditions (Year 2013) since the lanes have already been reconfigured i.e. the two left-turn lanes, three through lanes and one right-turn lane should be changed to two left-turn lanes, two through lanes and two right-turn lanes. All intersection capacity analysis effected by this correction should be revised accordingly and corresponding mitigation measures and potential improvements should be identified and evaluated for any anticipated significant impacts.

Response: The lane configuration for Existing Conditions (Year 2008) for the southbound approach to the Sepulveda Boulevard and Imperial Highway intersection reflects the lane configuration at the time the counts were collected in 2008. As discussed in Section 4.2.3.2 of the Bradley West Project Draft EIR (page 4-102), intersection turning movement counts were collected during the weekday morning, midday (MD) and afternoon time periods at the 71 intersections during July and August 2008. July and August are considered to be the peak months for airport related traffic around LAX and provide a conservative analysis as discussed in Section 4.2.3.2. (See also Bradley West Project Draft EIR pages 4-14, 4-90 and 4-172.) The study area intersections are located in close proximity to the airport and influenced by airport-related traffic activity; therefore, obtaining traffic count information when the airport is operating at peak conditions is important in obtaining a conservative estimate of traffic activity in the study area.

It should be noted that existing (Year 2008) conditions were not used as the basis of the impact analysis for the off-airport surface transportation analysis. As described in Section 4.2.2.1 of the Bradley West Project Draft EIR (page 4-89, Future-Adjusted (2013) Without Project Conditions), the impact analysis followed LADOT traffic analysis guidelines and assumed an "adjusted baseline" that consisted of existing traffic plus traffic from ambient growth and related projects, but no traffic from the proposed project. The adjusted baseline included the referenced reconfiguration and, therefore, this configuration was assumed as part of the baseline condition in the impact analysis, as discussed in Section 4.2.2.1 of the Bradley West Project Draft EIR (page 4-88, Modeling of Future 2013 Conditions) and as shown in Appendix C-3 (Intersection #71). As stated on page 4-88 of the Bradley West Project Draft EIR, "[t]he roadway network was modified to include funded roadway improvement projects to be constructed by 2013, along with roadway improvements that occurred since the counts were collected." Since the lanes were reconfigured after traffic counts were collected, the improvements were assumed for all future (Year 2013) with and without project scenarios. In summary, the intersection capacity analysis for the Sepulveda Boulevard and Imperial Highway intersection is not affected by the fact that the lane reconfiguration occurred subsequent to the traffic counts; thus, no revisions to the analysis or mitigation plan are required. The analysis and conclusions regarding significant impacts and corresponding mitigation measures presented in the Bradley West Project Draft EIR remain valid.

BWP-AL00002-6

Comment: Volume 3, Appendix C-3, Lincoln Boulevard and Jefferson Boulevard (Intersection #78): The lane configuration for Existing Conditions (Year 2008) for the southbound, eastbound and northbound approaches to the Lincoln Boulevard and Jefferson Boulevard intersection should be revised to match that shown for Future Conditions (Year 2013) since the lanes have already been reconfigured i.e. the southbound approach should have two left-turn lanes, three through lanes and one through/right-turn lane; the eastbound approach should have one left-turn lane, two through lanes and one through/right-turn lane; and the northbound approach should have one left-turn lane, four through lanes and one right-turn lane. All intersection capacity analysis effected by this correction should be revised accordingly and corresponding mitigation measures and potential improvements should be identified and evaluated for any anticipated significant impacts.

Response: The lane configuration for Existing Conditions (Year 2008) for the southbound approach to the Lincoln Boulevard and Jefferson Boulevard intersection reflects the lane configuration at the time the counts were collected in 2008. As discussed in Section 4.2.3.2 of the Bradley West Project Draft EIR (page 4-102), intersection turning movement counts were collected during the weekday morning, midday (MD) and afternoon time periods at the 71 intersections during July and August

2008. July and August are considered to be the peak months for airport related traffic around LAX and provide a conservative analysis as described in Section 4.2.3.2. (See also Bradley West Project Draft EIR pages 4-14, 4-90 and 4-172.) The study area intersections are located in close proximity to the airport and influenced by airport-related traffic activity; therefore, obtaining traffic count information when the airport is operating at peak conditions is important in obtaining a conservative estimate of traffic activity in the study area.

It should be noted that existing (Year 2008) conditions were not used as the basis of the impact analysis for the off-airport surface transportation analysis. As described in Section 4.2.2.1 of the Bradley West Project Draft EIR (page 4-89, Future-Adjusted (2013) Without Project Conditions), the impact analysis followed LADOT traffic analysis guidelines and assumed an "adjusted baseline" that consisted of existing traffic plus traffic from ambient growth and related projects, but no traffic from the proposed project. The adjusted baseline included the referenced reconfiguration and, therefore, this configuration was assumed as part of the baseline condition in the impact analysis, as discussed in Section 4.2.2.1 of the Bradley West Project Draft EIR (page 4-88, Modeling of Future 2013 Conditions) and as shown in Appendix C-3 (Intersection #78). As stated on page 4-88 of the Bradley West Project Draft EIR, "[t]he roadway network was modified to include funded roadway improvement projects to be constructed by 2013, along with roadway improvements that occurred since the counts were collected." Since the lanes were reconfigured after traffic counts were collected, the improvements were assumed for all future (Year 2013) with and without project scenarios. In summary, the intersection capacity analysis for the Lincoln Boulevard and Jefferson Boulevard intersection is not affected by the fact that the lane reconfiguration occurred subsequent to the traffic counts; thus, no revisions to the analysis or mitigation plan are required. The analysis and conclusions regarding significant impacts and corresponding mitigation measures presented in the Bradley West Project Draft EIR remain valid.

BWP-AL00002-7

Comment: Volume 4, Appendix C-5, page 4, La Cienega Boulevard and Imperial Highway (Intersection # 67): The AM peak vehicle counts for Existing Conditions do not match those shown in Volume 1 (Main Document), Figure 4.2-3b; similar errors occur with the Mid-day and PM peak vehicle counts. All intersection capacity analysis effected by these errors should be revised accordingly and corresponding mitigation measures and potential improvements should be identified and evaluated for any anticipated significant impacts. If similar errors occur for other project scenarios (e.g. "No Project," "Plus Project" etc.) then capacity analysis calculations and any resulting potential mitigation measures should be also revised accordingly.

Response: The typographical error is noted. In response, Figure 4.2-3b on page 4-105, Figure 4.2-4b on page 4-139, and Figure 4.2-5b on page 4-147 of the Bradley West Project Draft EIR have been revised. Please see Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR. The intersection capacity analyses under all scenarios are not affected by this typographical error as it only occurred in the figures. The correct values were used in the LOS calculations and hence no revisions to the LOS calculations are required.

BWP-AL00002-8

Comment: Volume 4, Appendix C-5, page 8, Lincoln Boulevard and Mindanao Way (Intersection #107): The eastbound AM left-turn vehicle count for Existing Conditions is not reflected in Volume 1, Figure 4.2-3c. Any similar omissions for Mid-day and PM peak eastbound left-turn counts and for other project scenarios should be corrected as needed.

Response: The eastbound left-turn vehicle count for Existing Conditions (Year 2008) was not shown in Figure 4.2-3c or used as an input for the intersection capacity analysis because it is an illegal turn in all time periods. Therefore, the eastbound left-turn vehicle count does not need to be reflected in Figure 4.2-3c.

BWP-AL00002-9

Comment: Volume 4, Appendix C-5, page 8, Sepulveda Boulevard and Lincoln Boulevard (Intersection #108): The V/C calculation result is missing from the data summary sheet.

Response: The comment is noted. In response, the V/C calculation worksheets for the Sepulveda Boulevard and Lincoln Boulevard intersection have been added to Appendix C-5. Please see Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR. The Draft EIR contained all the correct analysis associated with LOS for this intersection but the V/C calculation sheets were inadvertently omitted from the technical appendix. The intersection capacity analyses and results under all scenarios are not affected by this omission and hence no revisions are required.

BWP-AL00002-10

Comment: Volume 4, Appendix C-5, page 8, Lincoln Boulevard and Venice Boulevard (Intersection #109): The eastbound AM left-turn vehicle count for Existing Conditions does not match the count shown in Volume 1, Figure 4.2-3c; similar errors occur with the Mid-day and PM peak eastbound left-turn counts. All intersection capacity analysis effected by these errors should be revised accordingly and corresponding mitigation measures and potential improvements should be identified and evaluated for any anticipated significant impacts. If similar errors occur for other project scenarios (e.g. "No Project," "Plus Project" etc.) then capacity analysis calculations and any resulting potential mitigation measures should also be revised accordingly.

Response: The typographical error is noted. In response, the eastbound AM, Mid-day and PM left-turn volumes for the Lincoln Boulevard and Venice Boulevard intersection in Figure 4.2-3c on page 4-107 of the Bradley West Project Draft EIR have been revised. Please see Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR. The volumes used in the existing (2008) traffic conditions intersection analysis match the existing counts (as shown in Appendix C-4) for all analyzed periods; therefore, the existing (2008) traffic conditions analysis is not affected and no additional revisions are required.

BWP-AL00002-11

Comment: Volume 4, Appendix C-5, page 9, Lincoln Boulevard and Washington Boulevard (Intersection # 110): The AM peak vehicle counts for Existing Conditions do not match those shown in Volume 1, Figure 4.2-3c; similar errors occur with the Mid-day and PM peak vehicle counts. All intersection capacity analysis effected by these errors should be revised accordingly and corresponding mitigation measures and potential improvements should be identified and evaluated for any anticipated significant impacts. If similar errors occur for other project scenarios (e.g. "No Project," "Plus Project" etc.) then capacity analysis calculations and any resulting potential mitigation measures should also be revised accordingly.

Response: The typographical error is noted. In response, the volume figure for the Lincoln Boulevard and Washington Boulevard intersection in Figure 4.2-3c on page 4-107, Figure 4.2-4c on page 4-141, and Figure 4.2-5c on page 4-149 of the Bradley West Project Draft EIR has been revised. Please see Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR. However, the revised Mid-day southbound through volume at the Lincoln Boulevard and Washington Boulevard intersection does not match the vehicle counts because the volume was adjusted to be consistent with the traffic volumes at nearby intersections. As stated on page 4-90 in Section 4.2 of the Bradley West Project Draft EIR, traffic volumes, counted or forecasted, are balanced to ensure a reasonable amount of vehicles are either gained or lost between adjacent intersections. The volumes used in the intersection analysis for all scenarios match the revised volumes for all periods; therefore, the intersection analysis is not affected and no additional revisions are required.

BWP-AL00002-12

Comment: Volume 4, Appendix C-5, page 9, Lincoln Boulevard and 83rd Street (Intersection #111): The AM peak vehicle counts for Existing Conditions do not match those shown in Volume 1, Figure 4.2-3c; similar errors occur with the Mid-day and PM peak vehicle counts. All intersection capacity analysis effected by these errors should be revised accordingly and corresponding mitigation measures and potential improvements should be identified and evaluated for any anticipated significant impacts. If similar errors occur for other project scenarios (e.g. "No Project," "Plus Project" etc.) then capacity analysis calculations and any resulting potential mitigation measures should also be revised accordingly.

Response: The typographical error is noted. In response, the volume figure for the Lincoln Boulevard and 83rd Street intersection in Figure 4.2-3c on page 4-107, Figure 4.2-4c on page 4-141, and Figure 4.2-5c on page 4-149 of the Bradley West Project Draft EIR has been revised. Please see Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR. However, the revised AM and Mid-day northbound and southbound through volumes at the Lincoln Boulevard and 83rd Street intersection do not match the vehicle counts because the volume was adjusted to be consistent with the traffic volumes at nearby intersections. As stated on page 4-90 in Section 4.2 of the Bradley West Project Draft EIR, traffic volumes, counted or forecasted, are balanced to ensure a reasonable amount of vehicles are either gained or lost between adjacent intersections. The volumes used in the intersection analysis for all scenarios match the revised volumes for all periods; therefore, the intersection analysis is not affected and no additional revisions are required.

BWP-AL00003 Lichman, Barbara E. Chevalier, Allen & Lichman LLP 6/23/2009

BWP-AL00003-1

Comment: The following arc the comments of the Cities of Inglewood and Culver City ("Cities") concerning the referenced Draft Environmental Impact Report ("DEIR") for the Bradley West Project, formerly known as the Los Angeles International Airport (LAX) Tom Bradley International Terminal ("TBIT") Reconfiguration Project. Cities submit these comments in a spirit of cooperation and in the expectation that the matters raised will help to inform LA WA as to those issues which are most likely to be legally questionable.

Response: The comment is noted. Please see Responses to Comments BWP-AL00003-2 through BWP-AL00003-10 below.

BWP-AL00003-2

Comment: I. THE "TIERING" OF THE NOP ON THE "APPROVED MASTER PLAN" RESULTS IN IMPROPERLY ATTENUATED ENVIRONMENTAL REVIEW.

The DEIR justifies its attenuated environmental review, on the basis that, as a part of "the LAX Master Plan EIR" adequate environmental review has already been completed during the prior Master Plan environmental review process, and therefore the EIR for the Bradley West Project need primarily address "five categories of environmental resources [that] could potentially be affected by construction of the project." DEIR, p. 1-12. Cities disagree.

It is true that CEQA requires, in pertinent part, that "environmental impact reports shall be tiered whenever feasible . . . ", Public Resources Code § 21093(b). However, the utility of tiering is limited to those situations in which individual projects are consistent with the larger project that has already been environmentally reviewed.1 In this case, the "first tier" project or "programmatic EIR" against which the Bradley West Project is being measured for the purpose of tiering, i.e., the LAX Master Plan Environmental Impact Report ("Master Plan EIR") has changed dramatically since its original certification by virtue of the Stipulated Settlement.

Public Resources Code § 21094 allows a lead agency to use a tiered environmental impact report for a later, i.e., "second tier", project under certain specified conditions. However, § 21094 applies only to later projects that are not subject to Public Resources Code § 21166. [Pub. Res. Code §

21094(b)] Public Resources Code § 21166 provides, in part, that no subsequent or supplemental environmental report shall be required unless:

(a) substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report [Pub. Res. Code § 21166(b)], or

(b) new information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available. [Pub. Res. Code § 21166(c)].

First, there have been substantial changes in the circumstances under which Bradley West Project is being undertaken. Central to the Master Plan was the development of an off-site check-in facility and associated baggage tunnel, the Automated People Mover from the check-in facility to the Central Terminal Area ("CTA"), demolition of CTA Terminals 1, 2 and 3, elimination of parking in the CTA and movement to off-site parking facilities with associated improvements to on-site roadways. These projects are now defunct. In their place, LAWA is pursuing as yet undetermined Specific Plan projects, which are currently being evaluated under a separate EIR. See, DEIR p. 1-1.

There is no doubt, however, that the replacement of the original Master Plan projects are likely to have environmental impacts different from those of the first tier project. For example, elimination of off-site check-in and maintenance of Terminals 1 through 3 in the CTA, as well as parking, will result in additional vehicle traffic and emissions not contemplated in the first tier project. As a consequence, the air quality impacts of the Bradley West Project are, impermissibly, being evaluated in the vacuum left by changes in the Master Plan EIR.

Moreover, this information was not known, and could not have been known, when the programmatic EIR was certified, because the stipulated Settlement Agreement which mandated material changes in the project did not occur until nine months after the EIR certification.

Thus, there have been substantial changes in the circumstances under which the Bradley West Project is being carried out, and new, previously unknown information about the LAX Master Plan is now available. Therefore, tiering is inappropriate here, and an independent environmental review of the Bradley West Project is required.

1 "Tiering is a process by which agencies can adopt programs, plans, policies, or ordinances with EIRs focusing on ' the big picture' and can then use streamlined CEQA review for individual projects that are consistent with such . . . [first tier decisions] . . . " Koster v. County of San Joaquin, 47 Cal.App.4th 29, 36 (1996). [Emphasis added.]

Response: Please see Section 1.2 regarding the tiering methodology used in this Bradley West Project EIR. As discussed therein, the tiering methodology used for this EIR is appropriate. As identified in the December 10, 2008 Notice of Preparation (NOP) for this project-level EIR, LAWA initially determined, based on a preliminary review of the Bradley West Project, that five categories of environmental resources could potentially be affected by construction of the project and require additional review that was not otherwise provided in the LAX Master Plan Final EIR. As a result of this preliminary review, this EIR for the Bradley West Project focuses primarily on impacts related to surface transportation, air quality, human health risks, global climate change, biological resources, and noise. The analysis addresses construction-related impacts and, where appropriate, operations-related impacts such as for on-airport and off-airport traffic impacts at buildout of the Bradley West Project. Additionally, the Bradley West Project Draft EIR provides new air quality impacts analysis relative to changes in aircraft ground taxiing with the addition of contact gates along the west side of Tom Bradley International Terminal and emissions from operation of the building heating and cooling system proposed as part of the project, For those environmental disciplines where no new significant impacts were identified, a summary discussion of the findings of the LAX Master Plan EIR, and their relevance to the Bradley West Project, is provided in Chapter 5, Other Environmental Resources. It should be noted that the operational activity levels assumed as the basis of impacts analysis in the LAX Master Plan Final EIR are substantially greater than the

activity levels that currently exist at LAX and are projected to exist at buildout of the Bradley West Project - see Response to Comment BWP-AL00001-3. As such, the nature and extent of impacts identified in the LAX Master Plan Final EIR, and attendant mitigation requirements, that are reflected in the Bradley West Project Draft EIR are considered to be conservative (high).

The comment is incorrect in suggesting that the current reevaluation of certain elements of the LAX Master Plan constitutes substantial changes in the circumstances under which the Bradley West Project is being undertaken. Those elements, specifically, the "Yellow Light Projects" including the Ground Transportation Center and associated improvements, a portion of the Automated People Mover, the demolition of Terminals 1, 2, and 3, and the reconfiguration of the north airfield as contemplated in the LAX Master Plan, are currently being evaluated in the LAX Specific Plan Amendment Study (SPAS) pursuant to the requirement of the LAX Master Plan Stipulated Settlement. The Cities of Inglewood and Culver City ("Cities") are party to the Stipulated Settlement.

The types of improvements suggested in the comment as now being "defunct", such as development of an off-site check-in facility and associated baggage tunnel, the Automated People Mover from the check-in facility to the Central Terminal Area ("CTA"), demolition of CTA Terminals 1, 2 and 3, elimination of parking in the CTA and movement to off-site parking facilities with associated improvements to on-site roadways, are the very essence of the Yellow Light Projects currently being evaluated in the SPAS process. As indicated in the Stipulated Settlement, the SPAS will identify and evaluate potential alternative designs, technologies, and configurations that would provide solutions to the problems that the Yellow Light Projects were designed to address consistent with a practical capacity of 78.9 million annual passengers (MAP). While the specific alternative(s) to the Yellow Light Projects that may ultimately be selected and approved through the SPAS process are not yet known, the basic function and purpose of each Yellow Light Project as addressed in the LAX Master Plan EIR can be reasonably anticipated to remain generally unchanged. Moreover, until the SPAS process is complete and alternatives to the Yellow Light Projects are selected and approved, the Yellow Light Projects identified in the LAX Master Plan approved in December 2004 are considered to still be valid. The basic construct of the SPAS process is to require additional evaluation of the "yellow-lighted" elements of the LAX Master Plan, while the other elements of the LAX Master Plan can proceed to implementation. That fundamental concept is clearly recognized in the Stipulated Settlement; specifically, in Subsection IV.F, which states: "While the LAX Specific Plan Amendment Study is being processed, LAWA may continue to process and develop projects that are not Yellow Light Projects, consistent with the LAX Specific Plan Compliance Review procedures."

The commentor indicates that the replacement of the original LAX Master Plan projects is likely to have environmental impacts different from those identified in the LAX Master Plan EIR, and that the implications of such differences relative to the Bradley West Project should be addressed in the Bradley West Project EIR. Given that the range and specific details of the alternatives to the Yellow Light Projects are still being determined and evaluated as part of the SPAS, it would be speculative for the Bradley West Project EIR to attempt to evaluate the potential interrelationships between the Bradley West Project and the various Yellow Light Projects. The potential implications of the Yellow Light Project alternatives are best addressed through the EIR completed in conjunction with the SPAS process. In the meantime, there has not been a substantial change in circumstances with regard to the relevance and applicability of the LAX Master Plan EIR.

BWP-AL00003-3

Comment: II. THE BRADLEY WEST PROJECT HAS MANIFEST CAPACITY-ENHANCING POTENTIAL THAT HAS NOT BEEN ANALYZED.

The dramatic revisions to the Master Plan project that have occurred since its original approval reveal that the Bradley West Project's capacity enhancing potential remains unanalyzed. Specifically, the DEIR indicates that, after construction of the new TBIT, there will be a net increase of 7 aircraft gates:

- Nine gates will be added on the west side of TBIT. DEIR, p. 2-3.
- Nine gates to be constructed along the east side of TBIT. Id.
- The 11 gates that currently exist at TBIT will be eliminated (one of the current gates will be retained). Id.

The DEIR does not reveal, however, the way in which this increase will comply with the Judgment Pursuant to Stipulated Settlement in the case of El Segundo, et al. v. City of Los Angeles, et al., Riverside County Superior Court No. RIC426822 ("Stipulated Settlement"), that requires LAWA to reduce by 10 the number of Narrow Body Equivalent gates ("NBEG") by 2015 (i.e., from 163 to 153). See, Stipulated Settlement, § IV.B.1 ("By December 31, 2015, the total number of passenger gates (including remote gates) shall be reduced to no more than 153 passenger gates").

The Stipulated Settlement contemplates that the reduction in the number of gates will be achieved "through the build out of improved contact passenger gate facilities and the elimination of remote gate facilities as approved in FAA's ROD." Stipulated Settlement, § IV.B.1. However, the DEIR does not indicate how the additional 7 gates to be constructed by the Bradley West Project will be offset.

Although the DEIR states that "the new gates [constructed] along the west side at TBIT would reduce the need for, and use of, the existing remote gates for international flights" (DEIR, p. 2-11), it does not state that the remote gates will be "eliminated" as the Stipulated Settlement contemplates. Instead, the DEIR states that the remote gates "would be more available to be used for Remain Overnight (RON) aircraft parking. DEIR, p. 2-11. This statement, when taken with the statement in the NOP that after the construction of the additional gates, the existing remote gates would "continue other existing functions such as use of remote gates by aircraft that do not process passengers through TBIT, military and dignitary aircraft operations, etc."2 (NOP, p. 5) leave substantial questions with respect to the fate of the remote gates. Indeed, the DEIR at p. 4-364 specifically states that "with the Bradley West Project the number of daily operations that would be accommodated at the West Remote Pads would be reduced to 56," DEIR, p. 4-364, thereby indicating a reduction in use of the West Remote Pads, not elimination. Thus, although the remote gates may not be used for TBIT passengers, they would still be in use by LAX as passenger gates subject to the Stipulated Settlement.

The DEIR then states that "based on the above, implementation of the proposed project would result in a net reduction of 5 aircraft gates, with 7 gates being added to the current total of 12 gates at TBIT and 12 gates being eliminated with the demolition of the American Eagle Commuter Terminal." The demolition of the American Eagle Commuter Terminal, however, does not result in a decrease in the number of gates, since American Eagle is moving its operations to the unused United Express terminal and upgrading seven of the 18 existing aircraft hard-stand gates to contact gates. DEIR, p. 3-7. 3

Two questions are thus raised by the increase in number of gates in the DEIR: (1) how will that increase be offset sufficient to comply with the Stipulated Settlement; and (2) how will the impact of any increase be accounted for? As the apparent proposed increase in gate capacity is an essential predicate to increased operational capacity,4 its environmental impacts should be addressed in the EIR. To the extent that the increase in gate capacity will be offset by a decrease in another project, that project and its environmental effects must be analyzed in the EIR.

2 Although the DEIR does not mention using the remote gates for "military and dignitary use," it also does not state that the remote gates will not be used for flights that "do not process passengers through TBIT." NOP, p. 5.

3 This also raises the question as to whether American Eagle's move to the old Untied Express terminal will increase or reduce busing from the main terminal to the new American Eagle terminal. This aspect of the Bradley West Project has not been analyzed in the DEIR.

4 Indeed, American Eagle will be moving from a facility with 12 passenger gates to a facility with 18 passenger gates that are not currently in use.

Response: Please see Response to Comment BWP-AL00001-3 regarding the reasons why continued use of existing remote gates following completion of the Bradley West Project is not in conflict with the LAX Master Plan and is consistent with the provisions of the LAX Master Plan Stipulated Settlement.

The commentor states that there will be "net increase of 7 aircraft gates." However, as discussed in greater detail in Response to Comment BWP-AL00001-3, the proposed project would result in a net decrease of 5 aircraft gates. The commentor also states that the Stipulated Settlement requires LAWA to reduce "by 10 the number of Narrow Body Equivalent gates…" citing Stipulated Settlement subsection IV.B.1. As also discussed in Response to Comment BWP-AL00001-3, the subject section of the Stipulated Settlement does not apply because the "total passenger operations at LAX are below 75 million annual passengers." (Stipulated Settlement subsection IV.C). The million annual passenger (MAP) level at LAX in 2008 was 59.8 MAP and based on passenger operations thus far in 2009, it is anticipated that the overall passenger activity level for LAX in 2009 will be less than that of 2008.

BWP-AL00003-4

Comment: III. THE DEIR DOES NOT TAKE INTO ACCOUNT CUMULATIVE IMPACTS OF THE BRADLEY WEST PROJECT.

The DEIR does not mention, let alone evaluate, the cumulative impacts of the Bradley West Project when taken together with the other projects ongoing as a result of the Master Plan and Specific Plan.

The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

CEQA Guidelines, § 15355.

There is no doubt that the Specific Plan projects are reasonably foreseeable, given that NOPs for their environmental review are being circulated contemporaneously with this DEIR. Nor can it be argued that those projects are not closely related to the Bradley West Project. For example, the purpose of the Specific Plan project separating the runways in the North Runway Complex is accommodation of New Large Aircraft ("NLA"), like the A-380, the same purpose as asserted for part of the Bradley West Project. DEIR, p. 2-27. ("As part of the proposed Project, both taxiways would be relocated approximately 518 feet to the west ... and would be designed and constructed to accommodate ADG VI aircraft").

Moreover, the NOP included in its project description the construction of two tunnels to connect the Midfield Satellite Concourse, TBIT and CTA as part of the taxiway relocation. The NOP contains inconsistent statements in this regard. The DEIR modifies that language and now states that "while the impacts analyses presented in this EIR relative to relocation of Taxiways Q and S include the subject tunnel segments (i.e., tunnel segments were included in the initial project description used as the basis of the impacts analysis), the actual construction of the tunnel segments and system is anticipated to occur through a discretionary approval(s) separate from the Bradley West Project." DEIR, p. 2-27.

However, this approach fails to take into account the tunnel's cumulative impact when combined with those of other planned projects. It is not only the construction of the tunnels that is at issue here. It is also the environmental impact that the tunnels will have once they are operational, which has not been analyzed. Since the Midfield Satellite Concourse is "reasonably foreseeable," and the function of the tunnels is facilitate the movement of traffic between the facilities, the cumulative effect that the tunnels will have should be discussed in the EIR for Bradley West Project. With the tunnels still on the table, it seems that their larger purpose is to connect CTA with World Way West, giving passengers direct access to the western end of the airport. That concept remains unanalyzed.

Finally, the NOP stated that there will eventually be a new linear concourse to replace Terminals 1, 2 and 3 which is already anticipated by the Master Plan and that the linear concourse will be connected to TBIT. NOP, p. 4, n. 4. Although the DEIR has apparently dropped reference to any connection between TBIT and the replacement for Terminals 1, 2 and 3, there is no indication that there will not be such connection. If a connection is still part of the Bradley West Project and/or part of the demolition of Terminals 1, 2 and 3, the environmental implications of the proposed replacement for Terminals 1, 2 and 3 should be discussed in concert with the Bradley West Project analysis.

While the Bradley West Project's individual impacts may be portrayed as "minor," in comparison to those of the other projects, both individually and collectively, this comparison does not exempt the Bradley West Project from a collective evaluation with the other contemporaneous Specific Plan and approved Master Plan projects. See, e.g., Kings County Farm Bureau v. City of Hanford, 221 Cal.App.3d 692, 720 (1990) ("cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time").

In short, the Bradley West Project is part of a larger complex of projects aimed at readying LAX for more and larger aircraft, most of which were not analyzed in the Master Plan EIR. The DEIR should, therefore, at minimum, disclose the potential cumulative impacts of the Bradley West Project when taken together with the Specific Plan projects and approved Master Plan projects that have the same purpose.

Response: The comment suggests that the Master Plan improvements to be evaluated as part of the Specific Plan Amendment Study ("SPAS"), specifically the alternatives to the "Yellow Light Projects," be included in the evaluation of cumulative impacts. The purpose of the SPAS process is to identify alternatives to the "Yellow Light Projects" that further reduce impacts compared to the "Yellow Light Projects." However, as the comment acknowledges, it is premature and speculative at this time to say which, if any, of the potential alternatives that might result from the SPAS process would be adopted as alternatives to the "Yellow Light Projects." Please see response to comment BWP-AL00001-1 for additional discussion of the SPAS process. The NOP for the SPAS Draft EIR included several potential alternatives related to north airfield improvements and circulation system improvements. Consideration is also being given to the formulation of alternatives for both the airfield improvements and the circulation system improvements. At this point in the SPAS process, there is no single alternative Yellow Light project that is more foreseeable than any other, prohibiting meaningful analysis in relation to the Bradley West Project. The construction associated with the various SPAS alternatives would vary in terms of construction phasing, duration, intensity, and staging. Additionally, before implementation of any improvements that could be approved at completion of the SPAS process, LAWA would need to complete the necessary engineering, design, preparation of construction plans, contract advertising, contractor selection, and securing of funding. In light of the time required to complete these and other such steps, it is not reasonably foreseeable that construction of Yellow Light Projects would overlap construction of the Bradley West Project. The nature, timing, location, and intensity of construction impacts as related to air quality, noise, traffic and other resource areas will be thoroughly analyzed as the SPAS alternatives are refined and advanced through the Draft EIR analysis for SPAS.

The "tunnels" referenced in the comment, are part of the tunnel system discussed on page 2-27 of the Bradley West Project Draft EIR. The initial design plans for the project considered the possibility of constructing a portion of the tunnel system that would connect with a future Midfield Satellite Concourse, as envisioned in the LAX Master Plan and analyzed in the LAX Master Plan

Final EIR. While such a tunnel system is not required for the Bradley West Project, construction of those segments of the tunnels situated beneath the relocated taxiways was evaluated relative to reducing future environmental impacts and taxiway operations disruption associated with development of the tunnel system. Constructing the tunnel segments in conjunction with the proposed taxiway construction would avoid the future need to either tunnel beneath the subject taxiways or close them and excavate across them in order to complete the tunnel system. Further evaluation and consideration of that development approach resulted in a decision to hold construction of the tunnel segments until such time as the entire tunnel system can be developed in conjunction with construction of the future Midfield Satellite Concourse. Therefore, the Bradley West Project no longer includes tunnel segment improvements as part of the project. The evaluation of the potential cumulative impacts of such tunnels with regards to the specific concerns raised by the commentor can be addressed when the future Midfield Satellite Concourse is proposed.

The commentor also requests that the cumulative impacts analysis in the Bradley West Project EIR include the approved Master Plan projects. Such projects are identified in Section 3.3 of the Bradley West Project Draft EIR, while the overall cumulative relationship of all the Master Plan projects is addressed in the LAX Master Plan Final EIR. Please also see discussion of the cumulative methodology in the Draft EIR on pages 4-3 and 4-4.

BWP-AL00003-5

Comment: IV. THE DEIR RUNS AFOUL OF THE RULE AGAINST SEGMENTATION.

The Bradley West Project includes tunnels to accommodate the new Crossfield Taxiway while allowing easy passenger access to TBIT and the Midfield Terminal. The tunnels discussed in the NOP and the undergrounding of World Way West discussed in the separate NOP for the Crossfield Taxiway appear to provide an uninterrupted route between the Midfield Terminal, or even the western border of the airport at Pershing, and the CTA, through TBIT, which could eventually be made to accommodate travelers by creating a route from western airport ingress on Pershing all the way to the Midfield Satellite and beyond.

There is, however, no discussion of this enhanced passenger access potential or the impacts of the capacity or traffic that might result from such access. CEQA Guidelines define "project" to mean "the whole of an action" that may result in either a direct or reasonably foreseeable indirect physical change in the environment. CEQA Guidelines § 15378(a). This ensures "that environmental considerations not become submerged by chopping a large project into many little ones, each with a potential impact on the environment, which cumulatively may have disastrous consequences." Burbank-Glendale-Pasadena Airport Authority v. Hensler, 233 Cal.App.3d 577, 592 (1991). There are occasions when larger projects may be "segmented" into smaller components. They are limited to the circumstance when each segment has "independent utility," i.e., where the one segment would serve a viable purpose even if the rest is never built. See, Del Mar Terrace Conservancy, Inc. v. City Council of the City of San Diego, 10 Cal.App.4th 712, 732-33 (1992).

In this case, the terminal and tunnel projects are dealt with separately, but appear to be so interconnected as to be absent the requisite independent utility. Therefore, their traffic, air quality and capacity impacts should be discussed in conjunction with those projects.

Response: Please see Response to Comment BWP-AL00003-4, which explains that the Bradley West Project does not include construction of the tunnels or tunnel segments referenced by the commentor. Please also see Section 1.2.3 of the Bradley West Project Draft EIR regarding the tiering methodology used in the Draft EIR, and pages 4-3 and 4-4 regarding the cumulative impact analysis methodology.

BWP-AL00003-6

Comment: V. THE DEIR'S PROPOSAL FOR AN EIR LIMITED ONLY TO "ENVIRONMENTAL EFFECTS" FROM "PROPOSED CONSTRUCTION ACTIVITIES" IS INADEQUATE TO SATISFY CEQA.

The DEIR claims that it need only address the "environmental effects" from "proposed construction activities" because this is a project-level EIR tiered to the Master Plan EIR. DEIR, p. 1-12. However, the environmental effects of the Bradley West Project on air quality go beyond the impacts of construction.

First, the DEIR defines next generation aircraft as more "fuel efficient," but does not provide any evidence to support that statement. DEIR, n. 11, p. 2-3. Since the Bradley West Project is specifically designed to accommodate next generation aircraft (DEIR, p. 2-3) the EIR needs an in-depth discussion of: (1) air quality impacts of additional types and numbers of aircraft enabled by the Bradley West Project; (2) air quality impacts of the increase in "Next Generation Aircraft" operating at the airport; and (3) air quality impacts of potential increased vehicular traffic enabled by the new tunnels, and the precise extent to which such increases may be offset by reduction in use of remote gates.

Of particular concern is one of the primary features of the redesigned TBIT: the upgrading of the gates to accommodate "New Large Aircraft" (NLA). The goal, presumably, would be to accommodate additional NLA operations to LAX. As a direct result of the Bradley West Project, the DEIR predicts that there will be at least four more NLA arrivals at LAX per day. DEIR, p. 4-365 ("without the new contact gates and associated taxiway improvements at TBIT by 2013 . . . there are nine NLA arrivals per day . . . In the Bradley West Project simulation there are nine available gates for 13 NLA arrivals"). The environmental impact of the additional NLA arrivals (and, presumably, departures) needs to be assessed in the DEIR.

In short, the Bradley West Project may not have the limited air quality portrayed in the DEIR. Cities therefore strongly recommend that, given the potential synergistic air quality impacts of the Bradley West Project with other projects currently being evaluated in separate environmental processes for the Specific Plan and the remaining projects in the proposed Master Plan, as well as the Bradley West Project's potential for increasing capacity, complete air quality analyses be performed as part of the EIR. These analyses should include, at minimum, an air quality conformity applicability analysis, which takes into account the potential air quality impacts of other projects, planned or ongoing.

Response: The commentor is incorrect in asserting that the Bradley West Project Draft EIR "claims that it need only address the 'environmental effects' from 'proposed construction activities' because this is a project-level EIR tiered from the Master Plan EIR." As stated on page 1-1 of the Bradley West Project Draft EIR: "The main elements of the Bradley West Project are identified within the LAX Master Plan Final EIR as the 'reconfiguration' of TBIT. As a programmatic level EIR, the LAX Master Plan Final EIR was prepared and certified by LAWA for the entire LAX Master Plan. In accordance with CEQA, subsequent activities occurring within the Master Plan are examined in light of the program EIR to determine whether an additional environmental document must be prepared. As further described later in this section, LAWA determined that detailed design, engineering, and construction plan information recently developed for the Bradley West Project provides the ability to address certain impacts, particularly construction-related impacts and certain operations-related impacts that are not otherwise addressed, or not fully addressed, in the LAX Master Plan EIR. As such, this Draft EIR provides additional project-specific information on the environmental effects of the Bradley West Project, focusing on potentially significant environmental effects of the Bradley West Project that may not have been fully addressed in the LAX Master Plan Final EIR, and summarizing where and how other environmental impacts associated with the Bradley West Project are addressed in the LAX Master Plan Final EIR. Pursuant to the state CEQA Guidelines, the information presented in this EIR considers and incorporates by reference the information presented in the LAX Master Plan Final EIR, and provides the new or revised information necessary to describe the specific environmental effects associated with the Bradley West Project that were not otherwise addressed in the LAX Master Plan Final EIR." The Bradley West Project Draft EIR addresses both construction-related impacts and operations-related impacts as appropriate pursuant to the requirements of CEQA.

Footnote 11 on page 2-3 of the Bradley West Project Draft EIR notes improved fuel efficiency as one of several characteristics associated with new generation aircraft. Improved fuel efficiency is one of the main features currently highlighted by aircraft manufacturers in the design and production of new generation aircraft such as the Airbus A380, Boeing 787, and Boeing 747-8. According to the International Air Transport Association: "New aircraft are 70% more fuel efficient than 40 years ago and 20% better than 10 years ago. Airlines are aiming for a further 25% fuel efficiency improvement by 2020. Modern aircraft achieve fuel efficiencies of 3.5 liters per 100 passenger kilometers. The [Airbus] A380 and [Boeing] B787 are aiming for 3 liters per 100 passenger kilometer [approximately 78 miles per gallon]."1 According to Boeing, the 747-8 represents "a new benchmark in fuel efficiency and noise reduction, allowing airlines to lower fuel costs and fly into more airports at more times of the day. The 747-8 Intercontinental is 16 percent more fuel efficient than the 747-400, 11 percent more fuel efficient than the A380,"2. Relative to the Boeing 787, Boeing indicates "The airplane will use 20 percent less fuel for comparable missions than today's similarly sized airplane."3

Additionally, the Airbus A380, which is a new generation aircraft currently in operation, produces, in general, lower amounts of air pollutant emissions compared to other existing large aircraft such as the Boeing 747-400. This is evident in the FAA Emissions and Dispersion Modeling System (EDMS), which is used to estimate air pollutant emission from various types of aircraft under different operating conditions. The current version of EDMS, Version 5.1 published in September 2008, includes air pollutant emission factors for aircraft engines used on the Airbus A380 as well as factors for hundreds of other aircraft engines. Attachment 3 of this Final EIR delineates the emission factors for A380 and B747 aircraft. A review of emission factors for A380 aircraft compared to emission factors for B747 aircraft indicates the emissions from A380 engines are lower for carbon monoxide, smoke, and hydrocarbons in take-off mode and taxi/idle mode. Although oxides of nitrogen emissions are higher for the A380, the main difference in emissions compared to the B747-400 is in the tax/idle mode when such emissions are generally low by volume. On balance, the A380 is considered to have lower air pollutant emissions than the B747-400.

Similar to air quality, the A380 is generally quieter than other existing large aircraft - see Response to Comment BWP-AL00001-2.

The inclusion of new generation aircraft such as the A380 in the aircraft fleet mix projected to operate at LAX upon completion of the Bradley West Project would not result in operations-relation air pollutant emissions beyond those already addressed in the LAX Master Plan Final EIR. As described in Section 2.4.5 of the Bradley West Project Draft EIR and further explained in Response to Comment BWP-PC00011-49, the scheduling of flights, including the size and type of aircraft, is based on passenger demand. Based on demand trend considerations such as the numbers of passengers that desire to fly from a particular point of origin to a particular point of destination on certain days at certain times, carriers will schedule certain sizes and types of aircraft to accommodate those demands. Section 2.4.5 of the Bradley West Project Draft EIR provides an example of how airlines can meet an anticipated demand through the use of different size and types of aircraft, such as through the use of a slightly smaller gauge long-range aircraft like a Boeing 777 instead of an Airbus A380 to meet a particular demand during a certain time of the day.

The LAX Master Plan Final EIR addresses the operations-related air quality impacts associated with a future passenger activity level of 78.9 million annual passengers (MAP) for the approved LAX Master Plan. That analysis assumes a flight schedule and aircraft fleet mix that would accommodate that future passenger activity level. The number of daily aircraft operations (i.e., takeoffs and landings) anticipated in the LAX Master Plan EIR at buildout of the Master Plan is 2,279. By comparison, the passenger activity level projected at buildout of the Bradley West Project in 2013 is 67.6 MAP. That projection is considered to be very high given current economic conditions and a passenger activity level of 59.8 MAP at LAX in 2008, with projections of even lower activity levels at LAX for 2009 and possibly 2010. Relatedly, the number of average daily aircraft operations in 2008 was 1,705 and is anticipated to be even less in 2009.

Based on the above, it is reasonable to conclude that the air pollutant emissions associated with aircraft operations at buildout of the Bradley West Project, an LAX Master Plan project, would be

less than those previously addressed in the LAX Master Plan Final EIR. First, the passenger activity levels likely to occur at buildout of the Bradley West Project would be substantially less than those addressed in the LAX Master Plan Final EIR and the number of associated daily aircraft operations would also be substantially less. The inclusion of new generation aircraft, such as the A380, in the fleet mix anticipated for the Bradley West Project would not increase passenger activity levels and daily flight operations beyond those anticipated in the LAX Master Plan Final EIR. Given that aircraft sizing and scheduling typically responds to a projected demand, the inclusion of more large aircraft such as the A380 than anticipated in the LAX Master Plan Final EIR would, if anything, potentially reduce the number of daily flight operations and associated air pollutant emissions. Second, the inclusion of more aircraft such as the A380, which are newer and generally quieter and cleaner than other existing large aircraft, would likely produce less impacts than anticipated in the LAX Master Plan Final EIR. The integration of more A380 aircraft into a fleet mix designed to serve a projected demand would more likely be on a replacement basis than an addition basis (i.e., upsize the aircraft gauge on an existing long distance flight that already uses an older long range aircraft or use an A380 to consolidate two existing flights that are closely timed and use smaller aircraft, which in both cases could reduce the use of existing older aircraft).

With regard to the commentor's reference to potential impacts associated with new tunnels, please see Response to Comment BWP-AL00003-4 regarding the fact that the Bradley West Project does not include any such tunnels.

1 http://www.iata.org/whatwedo/environment/fuel_efficiency.htm
2 http://www.boeing.com/commercial/747family/747-8_background.html
3 http://www.boeing.com/commercial/787family/background.html

BWP-AL00003-7

Comment: VI. THE DEIR's ANALYSIS OF GREENHOUSE GASES AND POTENTIAL IMPACT OF CLIMATE CHANGE IS INADEQUATE

A. Thresholds of Significance.

The DEIR states on p. 4-316 that there are no thresholds of significance identified by the state for greenhouse gases. While it is true that there are no approved thresholds of significance, CARB has published Preliminary Draft Staff Proposal: Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act on October 24, 2008. That document suggests a 7,000 metric ton CO2e/year threshold for transportation projects, such as this one. It is the Cities' position that this threshold should be used in the EIR to assess the significance of the Bradley West Project's increase in the amount of greenhouse gases emitted.

In addition, on March 10, 2009, the U.S. Environmental Protection Agency issued a proposed rule which constitutes a comprehensive national system for reporting emissions of carbon dioxide and other greenhouse gases produced by major sources in the United States. There is no mention in the DEIR as to whether this program will apply to the Bradley West Project.

Response: The Bradley West Project Draft EIR addresses global climate change (GCC) and greenhouse gases (GHG) in Section 4.6 with supporting technical data provided in Appendix G. A discussion of AB 32 and other related state regulations and directives is provided in Section 4.6.3.1. Section 4.6.4 of the Bradley West Project Draft EIR acknowledges that the state Office of Planning and Research (OPR) has asked the California Air Resources Board (ARB) technical staff to recommend a method for setting thresholds of significance related to GHG emissions. The fact that ARB released its Preliminary Draft Staff Proposal (PDSP) of Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act does not lessen the accuracy or validity of the Bradley West Project Draft EIR's statement that "[t]here are no currently established CEQA thresholds of significance or regulatory thresholds for GHG emissions on a local, state, or national basis." Notwithstanding that ARB released the subject recommendations on October 24, 2008 for the sole purpose of soliciting public input and, by name alone - "Preliminary Draft Staff Proposal" - it is clear that ARB's recommendations are very

preliminary in nature and are not intended or designed at this time to be applied to a specific project, the commentor's application of the preliminary draft thresholds to the Bradley West Project does not comport with the basic methodology described in the PDSP. The 7,000 metric ton threshold cited in the comment pertains only to ARB's proposed operational emissions of industrial projects. Aside from the fact that the Bradley West Project is more likely to be considered a transportation project than an industrial project, at which the PDSP states that ARB staff is working on a proposal for an interim approach for thresholds for transportation projects (see page 5 of the PDSP), the PDSP clearly states that construction emissions would be evaluated in light of ARB interim performance standards, which are yet to be drafted; not quantitative standards as implied in the comment. The ARB has not yet published any recommended thresholds for transportation projects or construction activities, and has not finalized or adopted the preliminary recommendations in the PDSP.

In addition, OPR's Proposed Amendments to § 15064.7 CEQA Guidelines (Thresholds of Significance) for greenhouse gases do not mandate any particular threshold. The new § 15064.7(c) provides: "When adopting thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies, or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence." (http://www.opr.ca.gov/ceqa/pdfs/PA_CEQA_Guidelines.pdf)

With regard to the Proposed Mandatory Greenhouse Gas Reporting Rule published by the U.S. Environmental Protection Agency (EPA) on March 10, 2009, the comment period for the proposed rule closed on June 9, 2009, and EPA is currently reviewing the comments received. The emission source categories identified in the proposed rule do not include airports or any of the type of improvements proposed for the Bradley West Project. However, it should be noted that LAWA, in cooperation with the Citywide effort, is developing its own GHG inventory along with program measures to substantially reduce these emissions over the next few years.

It is important to note, as indicated in Section 4.6.4 of the Bradley West Project Draft EIR, each lead agency must make its own determination as to an appropriate threshold of significance related to GCC and GHG emissions, and may undertake a project-by-project analysis in so doing. This practice is evident throughout the state, with individual lead agencies making their own project-specific determination as to an appropriate significance threshold. Some lead agencies chose not to identify or apply any significance thresholds relative to project-related GCC and GHG emissions. LAWA, on the other hand, elected, for purposes of this EIR, to define and apply a threshold of significance in evaluating the GCC and GHG impacts of the Bradley West Project. Predicated on this threshold, tailored specifically to this project, the evaluation concluded that the project would result in significant impacts from both construction and operations.

In summary, the significance threshold and associated impacts analysis contained in Section 4.6 of the Bradley West Project Draft EIR are appropriate and consistent with the intent of CEQA.

BWP-AL00003-8

Comment: B. The DEIR Does Not Fully Analyze the Impacts from Climate Change.

In § 4.6.6.4 "Impacts from Climate Change," the DEIR attempts to anticipate the effects that would occur at the airport due to climate change. The DEIR simply states, without any support, that "sea level rise is most relevant to the Bradley West Project." DEIR, p. 4-330. The DEIR, however, does not address many possible impacts that climate change may have on Bradley West Project. For example:

1. Increased energy demands for cooling;
2. Soil moisture decrease, which will cause subsidence of the TBIT;
3. Buckling of pavements and concrete structures;
4. Shorter service life of metal and pavements;
5. Advanced equipment weathering;
6. Air and water quality impacts;
7. Fuel performance of vehicles;
8. To the extent that the Bradley West Project affects aircraft operations (which Cities contends it does), aircraft operations changes due to decreased lift.

Of most concern to Cities, is the way in which the Bradley West Project will affect the air and water quality in the surrounding area when climate change is taken into account. It is not clear that the analysis of TBIT's operations, as well as its construction, have factored in the potential additional emissions that could be caused by climate change during the lifetime of TBIT.

Response: Section 4.6.1.1 of the Bradley West Project Draft EIR acknowledges the potential for several types of impacts from climate change, including sea level rise, reduced snow pack resulting in changes to existing water resources, increased risk of wildfires, and public health hazards associated with higher peak temperatures, heat waves, and decreased air quality. The Bradley West Project Draft EIR recognizes sea level rise as being most relevant to the Bradley West Project because of the project site's proximity to the ocean (i.e., less than 2 miles) and the known elevation of the site (approximately 108 to 118 feet above sea level). To provide an analysis of potential climate change-related impacts associated with the eight topics listed by the commentor would be speculative at best. It can be said, however, the types of impacts listed, such as increased energy demands, soil moisture decrease, buckling of pavements, shorter service life of materials, advanced equipment weathering, and fuel performance of vehicles, would likely become apparent during the normal course of operations and maintenance monitoring over time and would be evaluated and addressed as appropriate at the time. It is completely speculative as to how air and water quality impacts associated with the proposed project would change in the future with climate change. Relative to aircraft operations, changes due to decreased lift as a result of climate change is also speculative, especially given that aircraft design and pilot training are already designed to handle a wide range of climatic and meteorological conditions currently found around the world.

It should be noted that the very idea of addressing a wide range of potential impacts from climate change within the context of an EIR is in the early stages of development statewide, and the approach to addressing such impacts varies substantially among lead agencies. There is currently no standard accepted approach to addressing this issue, and some agencies simply choose at this time not to address it at all. The Bradley West Project Draft EIR provides what LAWA has determined to be a reasonable and appropriate discussion of potential impacts from climate change, without engaging in the gross speculation that would be required to address the types of issues listed by the commentor.

BWP-AL00003-9

Comment: In summary, under current circumstances, it is inaccurate to suggest that the Bradley West Project will have the insignificant air quality, noise or other impacts portrayed in the DEIR. Cities therefore strongly recommend that, given the potential synergistic air quality and noise impacts of the Bradley West Project with other projects currently being evaluated in separate environmental processes for the Specific Plan and the remaining projects in the proposed Master Plan, as well as the Bradley West Project's potential for increasing capacity, complete air quality and noise analyses be performed as part of the EIR. These analyses should include, at minimum, an air quality conformity applicability analysis, which takes into account the potential air quality impacts of other projects, planned or ongoing, and not merely construction of the Bradley West Project, as well as the noise impacts of the additional aircraft that will be using TBIT as a result of the Bradley West Project.

Response: Complete air quality and noise analyses have been performed as part the Bradley West Project Draft EIR that analyze both the individual impact of the Bradley West Project and the cumulative impact of the Bradley West Project considering other past, present, and reasonably foreseeable future projects. The Bradley West Project Draft EIR analyzes both the potential construction-related and operational impacts of the project and does not suggest that air quality impacts would be insignificant. To the contrary, the EIR concludes the maximum daily and maximum quarterly construction-related emissions associated with the Bradley West Project would be significant for CO, VOC, NOx, PM10, and PM2.5; construction-related concentrations would be significant for NO2 and PM10; cumulative construction-related emissions would be significant for for CO, VOC, NOx, PM10, and PM2.5; cumulative construction-related concentrations for NO2 and PM10 would be significant; and cumulative airfield operations-related impacts for CO, VOC, NOx, SO2, PM10, and PM2.5 would be significant (see page 4-277 of the Bradley West Project Draft). In addition to the analysis in the air quality section of the Bradley West Project Draft EIR (Section 4.4),

operational impacts associated with the project are also analyzed in the Global Climate Change section of the EIR. (Bradley West Project Draft EIR, Section 4.6.)

The LAX Master Plan Final EIR analyzed future noise levels associated with the construction and operation of the LAX Master Plan and proposed mitigation measures and Master Plan commitments to address potentially significant noise impacts. The noise analysis in the Bradley West Draft EIR examines in greater detail the noise impacts associated with construction of the Bradley West Project, including the cumulative impact of the Bradley West Project in consideration of other past, present, and reasonably foreseeable future projects. The detailed study and thorough analysis in the Bradley West Project Draft EIR concludes that the implementation of noise-related Master Plan commitments and mitigation measures would sufficiently address potential construction noise impacts associated with the Bradley West Project such that no significant impacts on noise-sensitive uses from Bradley West Project construction equipment operation or traffic are expected to occur (see page 4-378 of the Bradley West Project Draft EIR).

Operational noise impacts are not analyzed in the Bradley West Draft EIR because the project would not have any additional significant operational environmental effects not already identified and discussed in the LAX Master Plan EIR. The Bradley West Project would not cause an increase in the number of daily flights arriving and departing from LAX and would not materially affect noise levels associated with aircraft ground operations. No notable changes in operational noise at LAX are expected to occur as a result of the Bradley West Project (see Section 4.8.1 of the Bradley West Project Draft EIR). Therefore, the Bradley West Project Draft EIR need not include a discussion of operational impacts. (CEQA Guidelines, Section 15168 (d) (3).)

BWP-AL00003-10

Comment: Cities appreciate this opportunity to comment and request that future documents continue to be transmitted to the office of their counsel, Chevalier, Allen & Lichrnan, LLP, at the above address.

Response: The comment is noted. A copy of the Final EIR will be sent to Chevalier, Allen & Lichman, LLP as well as to the Cities of Inglewood and Culver City. The Final EIR will also be available at www.ourlax.org.

BWP-AL00004 Maier, Tricia County of Ventura, Air Pollution Control District 6/22/2009

BWP-AL00004-1

Comment: Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the subject document. Additional comments may have been sent directly to you by other County agencies.

Air Pollution Control District staff has reviewed the subject project, which is a proposal for construction of new north and south concourses at the Tom Bradley International Airport. The project also includes construction of nine aircraft gates along the west side of the new concourses and relocation and consolidation of existing aircraft gates along the east side, renovation and enlargement of U.S. Customs and Border protection, concessions, office and operations areas. Among the objectives of the project are to accommodate "New Generation Aircraft" such as the Airbus A380, Boeing 747-8, and Boeing 787; improve passenger level of service and avoid loss of international travelers to airports outside the region and related adverse direct and indirect economic consequences.

Because the project location is Los Angeles, it is under the regulatory requirements of the South Coast Air Quality Management District, and, we therefore defer to South Coast Air Quality Management District for their comments on air quality issues for this project.

Response: The comment is noted. It should be noted that neither comment letters from other Ventura County agencies nor a comment letter from the South Coast Air Quality Management District were received before the close of the public comment period (June 22, 2009) for the Bradley West Project Draft EIR.

BWP-AL00005 Fujioka, William T. County of Los Angeles, Chief Executive Office 6/25/2009

BWP-AL00005-1

Comment: The County of Los Angeles (County) has reviewed the Draft Environmental Impact Report (DEIR) for the Los Angeles International Airport (LAX) Tom Bradley International Terminal (TBIT) Reconfiguration Project, also referred to as the Bradley West Project. Consistent with the California Environmental Quality Act (CEQA), our comments on the Bradley West Project are presented below.

1. USE OF LAX MASTER PLAN FINAL ENVIRONMENTAL IMPACT REPORT (EIR): The Bradley West DEIR is a project-level assessment that is tiered from and based upon the program-level information contained in the 2004 Final EIR. It refers to the 2004 EIR as a fully-certified and legitimate framework for subsequent LAX Master Plan activities. Although the EIR references the settlement agreement (p. 1-9), it does so in terms of the petitioners' challenge to the approval of the Master Plan program; the EIR is silent on the petitioners' challenge to the adequacy of the Master Plan EIR. The County has consistently noted the LAX Master Plan Final EIR is fundamentally flawed and should not be used as the basis for concluding that issues have previously been examined.

Response: The LAX Master Plan Final EIR is adequate and fulfills the requirements of CEQA. The Bradley West Project Draft EIR is properly tiered from the certified LAX Master Plan EIR as discussed in Section 1.2.3 of the Bradley West Project Draft EIR.

BWP-AL00005-2

Comment: 2. SAFETY AND SECURITY: The Bradley West DEIR does not evaluate safety and security for neighborhoods surrounding LAX.

Response: The proposed Bradley West Project provides for extensive improvements to the Tom Bradley International Terminal, all of which would occur near the center of the airport and would not extend to any of the neighborhoods surrounding LAX. Section 5.11 of the Bradley West Project Draft EIR addresses issues related to hazards and hazardous materials, and Section 5.13 addresses impacts related to police and fire services. These impacts were determined to be less than significant. The commentor does not indicate any specific concerns about potential safety and security concerns that are not adequately addressed in the Bradley West Project Draft EIR.

BWP-AL00005-3

Comment: 3. TRANSPORTATION: The DEIR does not address improvements that have previously been recommended by the County, including direct airport access from the I-105 Freeway and an interchange at I-405 Freeway and Lennox Boulevard, nor does it reference the County-recommended development of a Master Transportation Improvement Plan with phasing and monitoring elements."

Response: Section 4.2 of the Bradley West Project Draft EIR addresses the project-related traffic impacts to the off-airport surface transportation network. The analysis includes evaluation of impacts to local roadways and to nearby freeways. The results of the traffic analysis did not indicate a need for direct airport access from the I-105 Freeway or an interchange at the I-405 Freeway and Lennox Boulevard. While such improvements are included as mitigation measures in the LAX Master Plan Final EIR, the need for, and nature of, improvements to the off-airport surface transportation due to future traffic from LAX will be reevaluated in conjunction with completion of the LAX Specific Plan Amendment Study (SPAS). That analysis will also give due consideration to the County-recommended development of a Master Transportation Improvement Plan, as suggested in the comment.

BWP-AL00005-4

Comment: 4. LAND USE PLANNING: The DEIR does not acknowledge the Airport Land Use Commission finding that the LAX Master Plan is inconsistent with the County Land Use Plan. In fact, the DEIR states in Table 1-3 that there is no conflict between the project and any applicable plan or policy.

Response: The Bradley West Project Draft EIR addresses consistency of the LAX Master Plan with the Los Angeles County Airport Land Use Plan (ALUP) on page 5-6 in Chapter 5. As discussed therein, the LAX Master Plan, of which the Bradley West Project is a part, was approved and adopted by the Los Angeles City Council on December 7, 2004. Prior to that approval, the Los Angeles County Airport Land Use Commission (ALUC) indicated that the LAX Master Plan was inconsistent with the Los Angeles County Comprehensive Land Use Plan (CLUP) dated December 19, 1991; however, that determination was overruled by the Los Angeles City Council in accordance with the procedures and requirements of the State Aeronautics Act, which included the adoption of specific detailed findings that the LAX Master Plan is consistent with the purposes of the Aeronautics Act. As a result of this overruling, the LAX Master Plan took effect as if the ALUC had approved it or found it consistent with the compatible plan. Subsequent ALUC review of individual development projects related to the overruling of the determination are voluntary. (Public Utilities Code Section 21676.5(b).) Thus, as further discussed on page 5-18 in Chapter 5 of the Bradley West Project Draft EIR, ALUC review of the Bradley West Project is therefore voluntary. The Bradley West Project would not conflict with the ALUP, and implementation of the Bradley West Project would not affect the two main issue areas of concern expressed by the ALUC regarding the LAX Master Plan. One of those issues pertained to a slight shift in the location of the noise impact area that is shown in comparing the 65 CNEL noise contours of the 1991 CLUP and the Master Plan 2015 horizon year. Implementation of the Bradley West Project would not involve any change in runway locations or result in an increase in aircraft activity levels, as would influence noise contour locations. The second main issue of concern pertained to the areas that would be located in the Runway Protection Zones associated with the LAX Master Plan. Implementation of the Bradley West Project would not involve any runway improvements or relocations and, therefore, would not affect that issue of concern.

BWP-AL00005-5

Comment: 5. STRATEGIC REGIONALIZATION: The DEIR does not address LAWA's obligation to spearhead regional distribution of air traffic demand.

Response: The comment is noted. Efforts by LAWA to enhance the region's air transportation system is one of the objectives of the LAX Master Plan and was addressed in the LAX Master Plan EIR. (See LAX Master Plan Final EIR, Section 2.1.) The LAX Master Plan fosters distribution of the region's air traffic demand by utilizing a design capacity of 78.9 million annual passengers (MAP) and 3.1 million annual tons (MAT) of air cargo activity, which is comparable to the activity level identified in the scenario adopted by the Southern California Association of Government's (SCAG) Regional Council for the 2001 Regional Transportation Plan. As outlined in Section 2.3 of the Bradley West Project Draft EIR, the primary purpose of the Bradley West Project is to provide additional contact gates at LAX, particularly contact gates for new generation aircraft such as the Airbus A380, and to improve the passenger level of service at Tom Bradley International Terminal, including improved Customs and Border Protection facilities. The Bradley West Project is focused strictly on improving facilities at LAX and the project does not affect capacity or other factors that might translate to regional issues. Section 1.2 of the Bradley West Project Draft EIR provides an explanation of the relationship between the Bradley West Project and the LAX Master Plan. Since the comment pertains to the overall LAX Master Plan and/or the LAX Master Plan EIS/EIR, and does not pertain to, or raise, environmental issues specific to the Bradley West Project or the Bradley West Project Draft EIR, no further response is required. (Pub. Res. Code, Section 21091 (d); CEQA Guidelines, Section 15204(a).)

BWP-AL00006 Lorscheider, Brent City of Los Angeles, Bureau of Sanitation, Wastewater Engineering Services Division 6/18/2009

BWP-AL00006-1

Comment: This is in response to your May 7, 2009 letter requesting wastewater service information for the proposed project. The Bureau of Sanitation, Wastewater Engineering Services Division (WESD), has conducted a preliminary evaluation of the potential impacts to the wastewater system for the proposed project.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow(GPD)
Proposed Terminal	80 GPD/1000 SQ.FT	1,046,990 SQ.FT	83,759
	Total		83,759

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes the existing 57-inch Central Outfall Sewer (COS). The developer plans to connect to an existing private 12-inch sewer line, which feeds into the existing 57-inch Central Outfall Sewer (COS) line on Airport SS Easement, before discharging into a 50-inch COS line on Imperial Hwy. The current flow level (d/D) in the 57-inch and 50-inch lines cannot be determined at this time.

Based on our existing MIKE URBAN modeling data, the current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current MIKE URBAN Modeling d/D (%)	50% Design Capacity
57	Airport SS Easement	20	30.48 MGD
60	Imperial Hwy	*	57.96 MGD

*No data available

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. The developers will be required to connect into the 12-inch private sewer line, no direct connection is allowed in the COS. Further detailed gauging and evaluation will be needed as part of the permit process to identify a sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project.

Response: The comment is noted. The evaluation of potential project impacts to the existing wastewater system included in the comment is consistent with the conclusions on pages 5-108 and 5-109 in Chapter 5 of the Bradley West Project Draft EIR. LAWA will coordinate with the Wastewater Engineering Services Division of the City of Los Angeles' Bureau of Sanitation to obtain the necessary approval for sewer capacity and connection permit. Further, in accordance with LAX Master Plan Commitment PU-1, LAWA will develop and implement a utilities relocation program to minimize interference with existing wastewater facilities during construction of the Bradley West Project.

BWP-AL00006-2

Comment: STORMWATER REQUIREMENTS

The Bureau of Sanitation, Watershed Protection Division is charged with enforcement of the provisions of the National Pollutant Discharge Elimination System (NPDES) permit.

SUSMP AND STORM WATER INFILTRATION

Standard Urban Stormwater Mitigation Plan (SUSMP) is required for projects of certain size and type. The projects that are covered under these categories are required to incorporate measures to mitigate the impact of stormwater runoff as outlined in the guidance manuals titled "Development Best Management Practices Handbook - Part B: Planning Activities". In addition the "SUSMP Infiltration Requirements and Guidelines" prioritizes the use of infiltration and bio-filtration systems as the preferred methods to comply with SUSMP requirements. These documents can be found at: www.lastormwater.org/Siteorg/businesses/susmp/susmpintro.htm.

WET WEATHER EROSION CONTROL

A Wet Weather Erosion Control Plan is required for construction during the rainy season (between October 1 and April 15 per Los Angeles Building Code, Sec. 7002). For more information, please see attached Wet Weather Erosion Control Guidelines.

STORMWATER POLLUTION PREVENTION PLAN

A Storm Water Pollution Prevention Plan (SWPPP) is required for land disturbance activities over one acre. The SWPPP must be maintained on-site during the duration of construction.

Response: The comment is noted. As indicated on pages 2-51 and 5-38 of the Bradley West Project Draft EIR, in conjunction with detailed project design, LAWA will prepare a project-specific Standard Urban Stormwater Mitigation Plan (SUSMP). As indicated on page 5-45 of the Bradley West Project Draft EIR, a project-specific Storm Water Pollution Prevention Plan (SWPPP) will be developed for the Bradley West Project. Further, in accordance with Los Angeles Building Code Sec. 7002, a Wet Weather Erosion Control Plan (WWECP) for the proposed project will be prepared. The SUSMP, SWPPP, and WWECP for the Bradley West Project will be submitted to the Watershed Protection Division of the City of Los Angeles' Bureau of Sanitation for approval.

BWP-PC00001 Skjerven, Mark None Provided 6/6/2009

BWP-PC00001-1

Comment: Recommend approval of the EIR. Suggest that the contractor staging area be relocated to the Pershing site.

Response: The comment is noted. Please see Topical Response TR-BWP-ST-1 regarding the refinement and additional evaluation of Alternative 4: Construction Staging/Parking Areas-Optimize Use of West Construction Staging Area to Include Worker Parking. This alternative was designed in response to comments received on the NOP and Draft EIR for the Bradley West Project and provides an alternative to the proposed use of the Northwest Construction Staging/Parking Area, the East Contractor Employee Parking Area, or the Southeast Construction Staging/Parking Area as the primary parking area for project construction workers.

BWP-PC00002 Schneider, Nan ARSAC 6/6/2009

BWP-PC00002-1

Comment: Arsac would like to see the parking lot on the north moved to the alternative location.

Response: The comment is noted. Please see Topical Response TR-BWP-ST-1 regarding the refinement and additional evaluation of Alternative 4: Construction Staging/Parking Areas-Optimize Use of West Construction Staging Area to Include Worker Parking. This alternative was designed in response to comments received on the NOP and Draft EIR for the Bradley West Project and provides an alternative to the proposed use of the Northwest Construction Staging/Parking Area, the East Contractor Employee Parking Area, or the Southeast Construction Staging/Parking Area as the primary parking area for project construction workers.

BWP-PC00002-2

Comment: Arsac also feels that holding areas will be insufficent for the larger aircraft. Especially once LAX returns to profitability.

Response: Holdroom areas for the Bradley West Project were designed to accommodate Aircraft Design Group (ADG) VI aircraft based on a seat count of 500, which is the average seat count for the typical Airbus A380 aircraft that Bradley West is expected to serve in the foreseeable future, as further explained below. The holdroom area size was calculated assuming a passenger load factor of 90 percent, and assuming that 60 percent of the passengers would be seated in the holdroom, with the balance of passengers spending time in airline premier lounges, visiting the concessions areas or standing in the holdroom area. These planning parameters are more conservative than are typically used in terminal planning within the aviation industry and were used in order to provide a higher level of service within the Bradley West terminal. Whereas terminals are typically planned at a level of service "B," Bradley West is planned at a level of service "A." For example, typically, load factors of 80 to 85 percent are used to size holdroom areas; the Bradley West Project design used a 90 percent load factor. A 90 percent load factor represents a conservative assumption for international flights. The FAA long-range forecast projects international load factors of approximately 80 percent.1 In addition, the holdroom areas for the Bradley West Project were designed assuming 17 square feet per seated passenger and 12 square feet per standing passenger; the International Air Transport Association industry standard for level of service A is 15 square feet per passenger. Further, the high percentage of First Class and Business Class passengers on A380 flights reduces the amount of holdroom space needed, as these passengers are more likely to visit airline premier lounges and duty free retail opportunities until near boarding time.

For additional capacity and flexibility, holdrooms are designed contiguously, which allows passengers in each holdroom to conveniently utilize adjacent available holdroom space if a flight's designated holdroom becomes fully occupied. This is possible because the flight schedule will have staggered departures and, therefore, holdrooms will not all be busy at the same time.

Regarding the average number of passengers per plane used in the design of the Bradley West facilities, currently the airlines that are either operating A380s or have published their seat configurations for A380s on order are as follows:

Air France - 538 seats
Emirates - 491 seats
Lufthansa - 550 seats
Singapore - 471 seats
Qantas - 450 seats

While Airbus has published single class (i.e., Economy Class only) seating configurations with up to 853 seats, all of the airlines listed above will operate A380 aircraft with a three class configuration of First Class, Business Class and Economy Class for international flights, resulting in average seat counts of 500 seats. The First Class and Business Class seating will include private First Class

cabins and Business Class sleeper seating in most of the A380 seat configurations. These seat configurations show that international airlines plan to include a high percentage of First Class and Business Class seating into the foreseeable future. One reason for this is the increased revenue international airlines earn on upper class seating. For example, a First Class roundtrip on Qantas from LAX to Sydney is approximately $24,000, compared to $1,000 for an Economy fare. Another is the relatively high demand for upper class seating on long (10- to 14-hour) international flights. Therefore, using an average A380 seat count of 500 seats in the Bradley West Project design is reasonable and appropriate.

1 Federal Aviation Administration, FAA Long-Range Aerospace Forecasts Fiscal Years 2020, 2025 and 2030, September 2007, Available: http://www.faa.gov/data_research/aviation/long-range_forecasts/media/long07.pdf.

BWP-PC00003 Aelony, Avram None Provided 5/13/2009

BWP-PC00003-1

Comment: "Los Angeles World Airports last week released the Draft Environmental Impact Report for the Tom Bradley International Terminal (TBIT) Reconfiguration Project, and I urge you to send any comments or concerns you may have by the June 22, 2009 deadline."

Is this Draft available for viewing?
Please provide a link.

Response: The Bradley West Project Draft EIR is available under the "Projects-Publications" button at www.ourlax.org. The web link to the document was sent to the commentor via e-mail reply.

BWP-PC00004 Brubaker, Pat None Provided 5/14/2009

BWP-PC00004-1

Comment: I am a long time Westchester and LA resident and have seen LAX grow like a cancer on the surrounding communities. It must stop or the whole west side will be only an LAX site.

MODERNIZE YES
EXPAND NO, NO
REGIONALIZE YES, YES
GREEN YES AND YES AGAIN. . . .

Stop killing residential communities . . . . .have you seen the fine black soot from jet fuel that collects on structures surrounding the airport for miles . . .

Response: The comment is noted. Please see Response to Comment BWP-AL00005-5 regarding regional solutions to air transportation. It should be noted that the Bradley West Project would not involve expansion of LAX. As described in Section 2.4.5 of the Bradley West Project Draft EIR, the project would accommodate passengers that are anticipated to utilize LAX regardless of whether the proposed improvements are implemented.

The air quality impacts and human health risk associated with the Bradley West Project were addressed in Sections 4.4 and 4.5 of the Bradley West Project Draft EIR, respectively.

As described throughout Section 4.6 of the Bradley West Project Draft EIR, the Bradley West Project would be consistent with LAWA's Sustainability Plan and Sustainable Airport Planning, Design and Construction Guidelines to increase LAX's sustainability practices and address greenhouse gas emissions related to global climate change.

The following provides clarification regarding the issue of deposition of soot in areas near LAX.

As indicated in Topical Response to Comment TR-AQ-1 on pages 2-5 through 2-7 Part II, Volume 1 of the LAX Master Plan Final EIR, a number of studies have been undertaken to evaluate the deposition of soot, dust and other airborne particulate matter in the vicinities of large metropolitan airports - including LAX. Air monitoring studies were performed in the vicinity of LAX by the South Coast Air Quality Management District (SCAQMD, 2000a,b, Air Monitoring Study in the Area of Los Angeles International Airport & Inglewood Particulate Fallout Study Under and Near the Flight Path to Los Angles International Airport). For these studies, samples of atmospheric fallout were collected adjacent to the airport and at numerous residences located in the communities of El Segundo, Inglewood, Lennox, and Hawthorne. While soot particles were present in all the samples and generally in greater abundance than at other locations in the South Coast Air Basin, the studies concluded that there was "no discernable pattern of fallout material under LAX's flight path which would indicate a predominate influence from aircraft." A study commissioned by LAWA in 1998 that collected and evaluated atmospheric deposition samples at six sites surrounding LAX arrived at similar conclusions (LAWA, 1998, Technical Report Deposition Monitoring, prepared by Camp Dresser & McKee/Planning Consultants Research/AeroVironment Environmental Services).

From these studies, it is reasonable to assume that atmospheric deposition of soot, dust and other forms of particulate matter occurs in measurable quantities in the vicinities of these large metropolitan airports. However, because air pollution in urban areas is generated by many different sources (both natural and man-made) and because many of the constituents are petroleum-based (e.g., burned and unburned fossil fuels), it is difficult to isolate and attribute the full impact of airports and aircraft on atmospheric deposition in urban areas. Additionally, LAWA is currently in the process of conducting an Air Quality Apportionment Study (AQAS) that seeks to quantify contribution by LAX to the total emissions and concentrations of air pollutants in the surrounding communities. The AQAS will provide an updated baseline to be used for measuring the effectiveness of LAWA's efforts to reduce adverse air emissions.

In addition, as indicated on pages 4-322 and 4-323 in Section 4.6 of the Bradley West Project Draft EIR, LAWA, has developed a number of plans and guidelines to create a greener airport:

Sustainability Vision and Principles Policy: In 2007, the Los Angeles Board of Airport Commissioners adopted a Sustainability Vision and Principles Policy that includes a commitment to integrating sustainable practices into operations and administration processes under a set of six principles related to environmental stewardship, economic growth, and social responsibility. LAWA has since adopted several plans and policies aimed at implementing the Sustainability Vision and Principles Policy.

Sustainability Performance Improvement Management System (SPIMS): LAWA adopted SPIMS in August 2007 as a tool for identifying sustainability objectives, implementing actions to achieve the objectives, establishing targets and continual monitoring of progress. As part of the SPIMS process, the following fundamental objectives were identified to help LAWA achieve its goal of being the global leader in airport sustainability.
- Increase water conservation in all airport facilities and for all operations.
- Increase use of environmentally and socially responsible products.
- Increase recycling and source reduction efforts at all facilities and for all operations.
- Reduce energy usage and increase usage of green power at all airport facilities and in all operations.
- Reduce emissions from all operations including stationary and mobile sources.
- Reduce single occupancy trips to, from, and within LAWA airports.
- Incorporate sustainable planning, design, and construction practices into all airport projects.
- Promote sustainability awareness to airport employees and the greater community.
- Integrate sustainable practices into internal policies, business processes, and written agreements.

Los Angeles World Airports Sustainability Plan: LAWA's Sustainability Plan developed in April 2008 describes LAWA's current sustainability practices and sets goals and actions that LAWA will undertake to implement the initiatives described above (Green LA, Climate LA, Sustainability Visions and Principles Policy, and SPIMS). The Sustainability Plan presents initiatives for the fiscal

year 2008-2009 and long- term objectives and targets to meet the fundamental objectives identified above.

Sustainable Airport Planning, Design and Construction Guidelines: LAWA has developed Sustainable Airport Planning, Design and Construction Guidelines for Implementation on All Airport Projects. The Guidelines were developed to provide a comprehensive set of performance standards focusing on sustainability specifically for airport projects on a project-level basis. A portion of the Guidelines is based on the LEED rating systems for buildings. The Guidelines incorporate a "LAWA-Sustainable Rating System" based on the number of planning and design points and construction points a project achieves, as based on the criteria and performance standards defined in the Guidelines.

Based on the above, LAWA has taken steps to increase its sustainability practices related to daily airport operations, many of which directly or indirectly contribute to a reduction in GHG emissions. Actions that LAWA has been undertaking include promoting and expanding the FlyAway non-stop shuttle service to the airport in an effort to reduce the number of vehicle trips to the airport, establishment of an employee Rideshare Program, use of alternative fuel vehicles, purchasing renewably generated Green Power from LADWP, and reducing electricity consumption by installing energy efficient lighting, variable demand motors on terminal escalators, and variable frequency drive on fan units at terminals and LAWA buildings. LAWA is currently conducting a comprehensive GHG emission inventory that will be used to quantify emissions, identify areas for improvement, and assess the effectiveness of reduction measures.

BWP-PC00005 Carlson, Carol None Provided 5/17/2009

BWP-PC00005-1

Comment: As long time residents of Westchester and users of LAX, we do not object to modernizing the Bradley Terminal. We do object to any expansion. We do not need additional airlines and planes using LAX. These airlines need to be encouraged to use other regional airports. LAX is one of the least expensive airports for airlines to use. Modernizing costs need to be passed on to the airlines, encouraging them to fly out of other airports as the cost would be equal.

Response: The Bradley West Project would not involve expansion of LAX. It would not increase or otherwise affect the overall capacity of LAX (see Section 2.4.5 of the Bradley West Project Draft EIR). Rather, the project would accommodate passengers that are projected to arrive at LAX with or without the proposed project. The Bradley West Project does not relate to the LAX Master Plan's objective of regionalization since the project is strictly focused on LAX facility improvements. Please see Response to Comment BWP-AL00005-5 regarding regional solutions to air transportation. Improvements associated with the Bradley West Project would be funded, in part, by increased passenger facility charges, which would be paid by passengers flying into and out of LAX.

BWP-PC00005-2

Comment: I also understand that a large worker parking lot is to be constructed on Westchester Parkway near our neighborhoods. This is untenable. It must be moved somewhere it does not impact neighborhoods. Also using streets such as Lincoln, Sepulveda, or Manchester as an entrance to parking areas would create a mess as far as traffic goes. Imperial has a lot less traffic and a parking area on that end would be much better.

Response: Section 2.4.4 of the Bradley West Project Draft EIR describes several areas proposed for construction staging/lay down and contractor employee parking. These areas include the Northwest Construction Staging/Parking Area located east of the intersection of Westchester Parkway and Pershing Drive, the West Construction Staging Area located near the Pershing Drive/World Way West interchange, the Southeast Construction Staging/Parking Area located at the intersection of Imperial Highway and Aviation Boulevard, and the East Contractor Employee Parking Area located on La Cienega Boulevard south of 104th Street. The locations of these sites are shown in Figure 2-8. Alternative 4 would use the West Construction Staging Area at Pershing Drive and World Way West and would not use the Northwest Construction Staging/Parking Area.

(See Bradley West Project Draft EIR, Section 6.4.3.4 and please see Topical Response TR-BWP-ST-1 regarding the refinement and additional evaluation of Alternative 4: Construction Staging/Parking Areas-Optimize Use of West Construction Staging Area to Include Worker Parking.) As indicated in Section 6.4.3.4 of the Bradley West Project Draft EIR, workers commuting to the West Construction Staging Area would use Imperial Highway or Westchester Parkway to reach the staging area on Pershing Drive. Use of the West Construction Staging Area would reduce the amount of traffic using Westchester Parkway because workers coming from the south would use Imperial Highway to reach the Pershing Drive entrance to the West Construction Staging Area rather than Westchester Parkway to reach the Northwest Construction/Staging Area. However, workers coming from the north would still be expected to use Westchester Parkway to reach the West Construction Staging Area on Pershing Drive. As indicated in Section 6.4.3.4 of the Bradley West Project Draft EIR, construction-related traffic impacts would be the same whether the West Construction Staging Area or the Northwest Construction Staging/Parking Area is used. Significant construction-related impacts would be reduced to a less than significant level with implementation of the mitigation measures identified in the Bradley West Project Draft EIR. Neither Lincoln Boulevard, Sepulveda Boulevard, nor Manchester Avenue are proposed as entrances to the Northwest or West Construction Staging/Parking areas. The commentor's opposition to the proposed use of the Northwest Construction Staging/Parking Area is noted.

BWP-PC00005-3

Comment: We hope the concerns of residents of this community will be taken into consideration and addressed.

Response: The comment is noted. In accordance with CEQA Guidelines §15088, LAWA has prepared written responses to all comments received on the Bradley West Project Draft EIR. These responses are provided herein as part of this Final EIR. The responses to comments on the Bradley West Project Draft EIR will be considered by the decision-makers during project deliberations.

BWP-PC00006 Ponder, Beverly None Provided 5/24/2009

BWP-PC00006-1

Comment: This e-mail is to let you know that I and the residents of Playa del Rey that I have spoken for are not in favor of LAX expansion. It is time that other airports shared the traffic, noise and pollution that the residents around the airport have suffered. A regional approach must be taken to accommodate airline services, not overburdening an existing airport and congesting our freeways with the traffic to and from the airport. If modernization can be accomplished without expansion into the North runway, then that is what I am in favor of. Thank you for the opportunity to express my opinion.

Response: The Bradley West Project would not involve expansion of LAX. It would not increase or otherwise affect the overall capacity of LAX (see Section 2.4.5 of the Bradley West Project Draft EIR). Rather, the project would accommodate passengers that are projected to arrive at LAX with or without the proposed project. Please see Response to Comment BWP-AL00005-5 regarding regional solutions to air transportation. No modifications to the north airfield are proposed as part of this project.

BWP-PC00007 Coyne-Hoerle, Helen None Provided 6/4/2009

BWP-PC00007-1

Comment: I am very concerned regarding the Reconfiguration Project and the impact on the environment. I believe there are other ways, such as expanding the role of regional airports and pricing projects to alleviate traffic at lax.

Response: The commentor's concerns about the project and its impact on the environment are noted. The project's impacts on the environment are addressed throughout the Bradley West Project Draft EIR. Please see Response to Comment BWP-AL00005-5 regarding regional solutions to air

transportation. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Bradley West Project Draft EIR (Public Resources Code Section 21091(d); CEQA Guidelines Section 15204(a)).

BWP-PC00007-2

Comment: Thank you. I will appreciate your placing me on any and all mailing lists concerning this project.

Response: The comment is noted. LAWA has added the commentor's contact information to their stakeholder and interested parties mailing list for future correspondence regarding the LAX Bradley West Project.

BWP-PC00008 Dragone, John Los Angeles International Airport Area Advisory Committee 6/16/2009

BWP-PC00008-1

Comment: The Los Angeles International Airport Area Advisory Committee (LAXAAC) provides these comments regarding the Draft Environmental Impact Report (Draft EIR) for the Tom Bradley International Terminal (TBIT) Reconfiguration Project.

Our committee includes residents from both the Westchester/Playa del Rey community and the City of El Segundo. As such, we believe that neither the proposed Northwest Construction Staging/Parking Area nor the proposed Southeast Construction Staging/Parking Area is an appropriate location for construction staging and parking. For that reason, we suggest that LAWA use the West Construction Staging Area for construction staging and parking during the five and one-half years of the TBIT Reconfiguration Project.

Response: The comment is noted. Please see Topical Response TR-BWP-ST-1 regarding the refinement and additional evaluation of Alternative 4: Construction Staging/Parking Areas-Optimize Use of West Construction Staging Area to Include Worker Parking. This alternative was designed in response to comments received on the NOP and Draft EIR for the Bradley West Project and provides an alternative to the proposed use of the Northwest Construction Staging/Parking Area, the East Contractor Employee Parking Area, or the Southeast Construction Staging/Parking Area as the primary parking area for project construction workers.

BWP-PC00008-2

Comment: We recognize that TBIT is inadequate for current traffic and we recognize the need to modernize TBIT. Inasmuch as TBIT currently handles as many as 550 passengers per flight, and it is expected that larger planes will accommodate more people, perhaps as many as 750 per flight, we are concerned that the facilities planned may not be adequate to accommodate that many people. The Draft EIR should address the adequacy of the planned facilities to accommodate large numbers of people arriving at one time.

Response: The comments regarding the need to modernize TBIT are noted. Please see Response to Comment BWP-PC00002-2 regarding the number of passengers per aircraft and the sizing of the proposed facilities to accommodate A380 and other new generation aircraft. Projected average numbers of passengers per aircraft are based on information by the airlines that are either operating A380s or have published their seat configurations for A380s on order, providing substantial evidence to support the analysis and conclusions in the Bradley West Project Draft EIR. It should be noted that the Bradley West Project Draft EIR addresses the adequacy of the planned facilities to accommodate large numbers of people arriving at one time, specifically the implications for traffic within the CTA (see Section 4.1 of the Draft EIR, specifically the discussion of changes in passenger arrival times in Section 4.1.1, a graphic representation of these differences in Figures 4.1-13 through 4.1-17, and a discussion of project-related impacts in Section 4.1.8).

BWP-PC00008-3

Comment: We note that the Draft EIR anticipates an increase in international travel activity levels by 2013 whether or not the TBIT Reconfiguration Project occurs (see Table 1-2, page 1-22 and page 2-44). For that reason, LAWA ultimately should be undertaking efforts to regionalize air transportation for both security and efficiency reasons. That might mean that LAWA would enhance and promote the Ontario airport for international travel to Canada and Mexico, or would take steps to diminish the attractiveness of LAX for domestic travel in favor of Ontario.

We firmly believe that only a regional approach to air transportation will mitigate the transportation and security problems currently impacting the entire Southern California area. Only if the air traffic burden can be spread throughout the Southern California region, will we continue to see the economic benefits of a vibrant transportation system without unduly impacting one portion of the Southern California community. Please do not lose sight of this ultimate goal.

Please let us know if you have any questions regarding our comments. See attached mission statement.

Response: The comment is noted. Please see Response to Comment AL00005-5 regarding regional solutions to air transportation.

BWP-PC00009 Cope, Danna None Provided 6/22/2009

BWP-PC00009-1

Comment: For a project of this size, more time is needed for community members to review the documents, especially as many references are made to the Master Plan EIR, without including the pertinent data within the TBIT DEIR.

Response: The comment is noted. The 45-day public review period for the Bradley West Project Draft EIR is consistent with the requirements for public review of draft EIRs per Section 15105(a) of the State CEQA Guidelines.

As described in Chapter 1 of the Bradley West Project Draft EIR, the Bradley West Project EIR is "tiered" from, and incorporates by reference, the LAX Master Plan Final EIR and focuses on those effects not previously considered in the LAX Master Plan EIR. In addition, information and analyses from the LAX Master Plan Final EIR pertinent to the Bradley West Project is included verbatim or in summary form throughout the Bradley West Project Draft EIR, as appropriate and necessary, to assist the reader.

For example, as described in the introduction to Chapter 5 of the Bradley West Project Draft EIR, although the environmental resource areas in Chapter 5 are within the scope of the LAX Master Plan EIR, and no further environmental documentation is required, a summary discussion of the findings of the LAX Master Plan EIR, and their relevance to the Bradley West Project, is provided. For each of the 14 environmental categories addressed in Chapter 5, a summary of the environmental setting, as provided in the LAX Master Plan Final EIR and updated, where applicable, to reflect changes in the setting that have occurred since publication of the LAX Master Plan Final EIR in 2004, is provided. Also, the full text of all applicable CEQA thresholds of significance as included in the LAX Master Plan Final EIR is provided for each environmental category addressed in Chapter 5. Further, each environmental category in Chapter 5 includes a section entitled "LAX Master Plan" which describes the impacts that are relevant to the Bradley West Project as identified in the LAX Master Plan Final EIR and Addenda, presents the full text of LAX Master Plan commitments and mitigation measures that address these impacts, and identifies any impacts associated with the LAX Master Plan that would remain significant after mitigation.

As indicated above, the Bradley West Project Draft EIR focuses on those effects not previously considered in the LAX Master Plan EIR. These potential effects, related to surface transportation, air quality, human health risks, global climate change, biological resources, and noise, are addressed in Chapter 4 of the Bradley West Project Draft EIR. Where applicable, Chapter 4

identifies the key findings of the LAX Master Plan EIR that are applicable to the Bradley West Project. Similar to Chapter 5, Chapter 4 of the Bradley West Project Draft EIR identifies and describes the LAX Master Plan commitments and mitigation measures that are also relevant to the Bradley West Project.

BWP-PC00009-2

Comment: As a minimum, all construction/destruction contractors and equipment should follow the rules and restrictions that were established for the South Airfield Improvement Project. This should include all potential sources of air or noise pollution.

Response: Section 4.3.7, Section 4.4.5, and Section 4.8.5 of the Bradley West Project Draft EIR identify LAX Master Plan commitments and mitigation measures that serve to reduce construction-related traffic, fugitive dust, and noise impacts to surrounding areas, respectively.

Measures specific to addressing traffic impacts would be included in the Construction Traffic Management Plan (CTMP) required under LAX Master Plan Commitment ST-18, which must be submitted by the Bradley West Project contractor to LAWA at the beginning of the project. The Bradley West Project CTMP will detail the designated haul routes for construction traffic, deliveries, and construction employee trips. The Bradley West Project CTMP will also designate construction employee shift hours that do not coincide with the heaviest commuter traffic periods (7:00 a.m. to 9:00 a.m., and 4:30 p.m. to 6:30 p.m.) in accordance with LAX Master Plan Commitment ST-14.

Measures specific to addressing fugitive dust emissions would be included in the Fugitive Dust Control Plan (FDCP), which must be submitted by the Bradley West Project contractor to LAWA at the beginning of the project. The Bradley West Project FDCP will provide specific requirements to control fugitive dust emissions in compliance with Rule 403 of the South Coast Air Quality Management District (SCAQMD).

Measures specific to addressing construction noise would be included in the Construction Noise Control Plan (CNCP) required under LAX Master Plan Mitigation Measure MM-N-7, which must be submitted by the Bradley West Project contractor to LAWA at the beginning of the project. The CNCP will specify feasible measures to reduce potential noise impacts throughout the construction of the Bradley West Project. The Bradley West Project CNCP will incorporate the requirements for construction scheduling as specified in LAX Master Plan Mitigation Measure MM-N-10, which recognizes noise sensitive hours as being nighttime and early morning, and anytime on Sundays and holidays.

These control measures are the same as those required during construction of the South Airfield Improvement Project and the Crossfield Taxiway Project.

In addition, as described in Section 4.6 of the Bradley West Project Draft EIR, the Bradley West Project would comply with LAWA's Sustainable Airport Planning, Design and Construction Guidelines that serve to reduce greenhouse gas emissions.

BWP-PC00009-3

Comment: LAWA employee Mike Doucette has stated that the new lounge areas for TBIT are based on the number of air passengers that are currently being carried by aircraft, such as the NLA A380, plus an additional 20%. However, as we have seen with the SSTs and 747s, after the new aircraft are in use for a few years, the number of passengers increases dramatically. The A380s are currently carrying about 550 passengers; however, they have been cleared by the FAA to carry over 750 passengers. 550 plus 20% comes to only 660 passengers, per aircraft, not 750. This deficit in the future capability to serve the potential number of air travelers highlights the compelling need for LAWA to proceed immediately to implement measures to achieve a true regional approach to air traffic.

Response: Please see Responses to Comments BWP-PC00002-2 and BWP-PC00008-2 regarding the number of passengers per aircraft and the sizing of the proposed facilities to accommodate A380 and other new generation aircraft. Please see Response to Comment BWP-AL00005-5 regarding regional solutions to air transportation.

BWP-PC00009-4

Comment: The TBIT DEIR should include information, preferably in map form, that indicates the location of the crossfield taxiway(s), and the midfield terminal.

Response: The comment is noted. The location of the Crossfield Taxiway Project (CFTP) in relation to the proposed Bradley West Project is shown on the following figure. The location of the future Midfield Satellite Concourse (MSC), referred to in the comment as "the midfield terminal," is not shown on the subject figure, as the MSC is still in the early stages of engineering design (see Section 3.3.1 of the Bradley West Project Draft EIR). The general physical relationship between the MSC, the addition of new aircraft gates on the west side of Tom Bradley International Terminal (e.g., the Bradley West Project), and the airfield areas parallel to the MSC, which accommodate crossfield taxiways such as Taxiway C13 (i.e., the Crossfield Taxiway Project) can be seen in Figure 1-3 of the Bradley West Project Draft EIR and Figure F.3-14 of the LAX Master Plan Final EIR. Construction of the CFTP is expected to overlap with construction of the Bradley West Project by several months and the resultant potential cumulative impacts of that overlap are addressed in the Bradley West Project Draft EIR. (See Section 3.3.1 of the Bradley West Project Draft EIR) Construction of the MSC, if approved, would not occur until after completion of the Bradley West Project.

BWP-PC00009-5

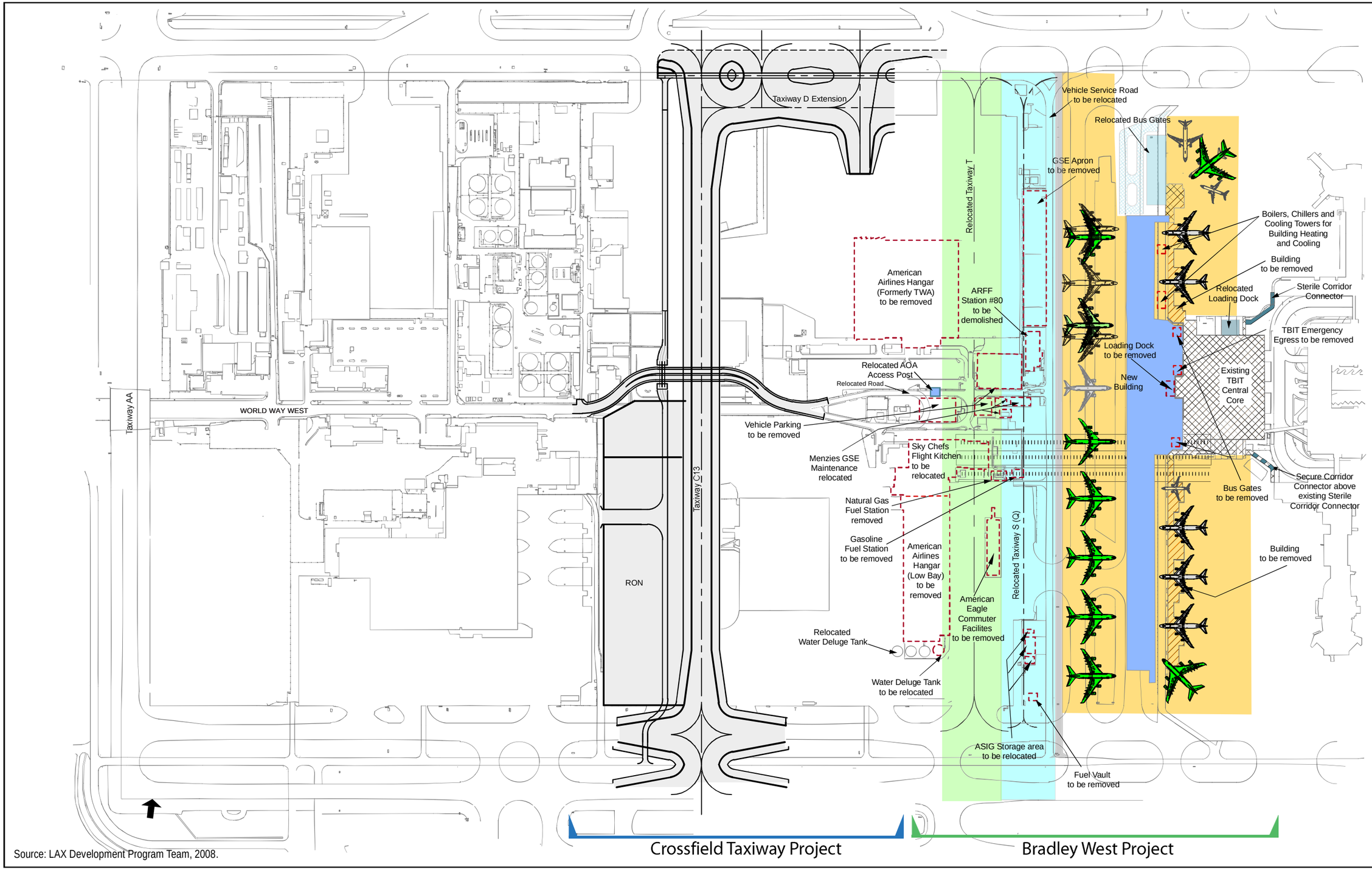
Comment: The construction of TBIT and the crossfield taxiway may coincide; what measures are being taken to facilitate potential air traffic delays due to blocked runways/taxiways?

Response: A comprehensive construction phasing has been developed to account for any overlap in activities between the LAX Crossfield Taxiway Project (CFTP) and the Bradley West Project. Based on the currently proposed construction schedule for each project, it is anticipated that there would be approximately 6 months of overlap in activities. During that time, the respective construction activities of each project would be well removed from each other, with work on the CFTP being the development of the new Remain Overnight (RON) aircraft parking area west of the new Taxiway C-13, and work on the Bradley West Project being the closure and removal of uses east of the American Airlines low-bay hangar in preparing the area for construction of Taxiway S. In addition to close coordination between the construction plans for each project, members of the LAWA project design team meet with FAA Air Traffic Control Tower staff on a regular basis to review the proposed construction phasing plans and identify the needs to maintain safe and efficient aircraft movement on the ground during the construction program.

BWP-PC00009-6

Comment: What measures are proposed to provide additional support to the upper level of the CTA? The roadway is almost buckling in some areas. What studies have been done since the additional heavy concrete barriers were erected for security purposes?

Response: The upper level of the Central Terminal Area (CTA) roadway system is structurally sound and its integrity has not been compromised with the recent or proposed security improvements constructed. There is no observed "buckling" or other such structural failure of the roadway system as suggested by the commentor. In addition, based on a July 30, 2009, email correspondence from Jeffrey Smith, LAWA Chief Airports Engineer to Michael Molina, LAWA Senior Director of External Affairs, Caltrans produces an annual assessment report for the bridge spans that cross over Sepulveda Boulevard. The 2008 assessment includes some condition assessment and



Source: LAX Development Program Team, 2008.

maintenance recommendations for the bridge spans and the second level roadway in the CTA, but reaffirmed the findings of LAWA's previous assessments that concluded that the second level roadway was structurally sound and safe for public use. Based on this assessment process, a Caltrans project is in place to install a metal jacket on one or more bridge columns over Sepulveda Boulevard within the next year or two. Furthermore, Caltrans has identified a number of surface cracks and concrete spalls (i.e., small areas where surface concrete is flaking or chipping off) that they have asked LAWA to address for both the Sepulveda Boulevard bridge spans and the second level roadway in the CTA. While Caltrans has identified these maintenance items, there is no concern of imminent failure or concern for safe operation or use of these bridge spans.

Furthermore, as described in Section 3.3.3 of the Bradley West Project Draft EIR, LAWA will initiate in the future several stand-alone routine maintenance and upgrade projects independent of the LAX Master Plan that are intended to address improvements to the CTA roadway system. These projects, summarized collectively in the report as Miscellaneous Improvements within Central Terminal Area, will include the following projects:

(a) CTA Seismic Retrofits--The purpose is to retrofit pedestrian and vehicular bridges.

(b) CTA Joint Repair (Roadway and Parking)--The purpose is to provide improvements to the expansion joints throughout the CTA.

(c) CTA Security Barriers (Phase 2)--The purpose is to provide additional protection in the CTA.

Furthermore, construction and operation of the Bradley West Project would not affect the structural integrity of the upper level roadway system. As discussed in Section 4.1.1, "Construction employee parking and construction delivery vehicles are not anticipated to access the CTA roadway system." As further discussed in Section 4.1.1, the "Bradley West Project would affect only the peaking characteristics of airline passenger activity and would not affect the overall number of passengers accessing the airport." In summary, the structural system is fully capable of handling any change in traffic loads that would be generated by the traffic peaking characteristics from the Bradley West Project.

BWP-PC00009-7

Comment: LAWA should publicize to the surrounding communities information on runway closures and off- and on-airport street closures, stating the duration and start and end dates for the closures.

Response: The comment is noted. No runway closures are anticipated to be required for construction of the Bradley West Project.

In accordance with LAX Master Plan Commitment C-1, LAWA has established a Ground Transportation/Construction Coordination Office for construction projects at LAX. The Ground Transportation/Construction Coordination Office is responsible for monitoring traffic conditions and advising motorists and delivery drivers about detours and congested areas. Specific means of communication used by LAWA and the Ground Transportation/Construction Coordination Office to relay information to motorists include (a) a construction traffic link provided at www.ourlax.org and www.lawa.org to provide up-to-date traffic information (lane closures, detours, etc.) on construction projects at and in the vicinity of LAX, (b) public information messages broadcast via AirRadio (AM 530), and (c) portable, electronic changeable message signs and static signs. Although lane closures and detours along public roadways are not anticipated to be required as part of the Bradley West Project construction, implementation of mitigation measures to address significant traffic impacts associated with the Bradley West Project would result in temporary lane closures and detours within the on- and off-airport roadway system. LAWA will use the above-noted communications tools during construction of the Bradley West Project.

BWP-PC00009-8

Comment: Setting, Environmental Impacts, and Mitigation Measures; TBIT 4.1.9, Mitigation Measures: MM-ST (BWP)-1 Trip Reduction Measures (a): While the FlyAway program offers the only true traffic reduction at LAX, it is unreasonable to expect this service to provide relief for the TBIT air passenger traffic; these are international travelers, often with extra baggage, often arriving by taxi service.

Response: The comment is noted. Mitigation Measure MM-ST (BWP)-1 will provide operational measures that promote increased high-occupancy vehicle use such as the FlyAway bus service and, thereby, reduce the overall traffic demand using the CTA roadway system. This overall reduction in traffic activity would benefit all terminal area roadway users, including those passengers accessing the TBIT curbsides. Furthermore, while it is likely that non-resident international travelers may be less inclined to use the FlyAway service than would resident travelers from the Los Angeles region, many local area resident travelers would be candidates to use the FlyAway service to avoid driving in roadway congestion and parking at the airport. Although the direct effect on trip reduction has not been quantified, it is anticipated that the promotion of these types of trip-reduction measures will have a net positive effect on roadway traffic congestion within the CTA. However, as discussed on pages 4-85 and 4-86 in Section 4.1.10 (On-Airport Surface Transportation), of the Bradley West Project Draft EIR "roadway links" impacts would remain significant and unavoidable after implementation of mitigation measures.

BWP-PC00009-9

Comment: Mitigation Measures, TBIT 4.2.9: Thirteen major intersections surrounding LAX are listed as having significant and unavoidable traffic impact; the improvements considered in the TBIT Draft EIR were determined to be infeasible. Only six intersections were found to have mitigation measures that would reduce the traffic impacts to a less-than-significant level. The project, therefore, will cause an undue hardship on the surrounding communities.

Response: The comment is noted. In accordance with CEQA requirements, the Bradley West Project Draft EIR addresses the impacts of the proposed project, recommends feasible mitigation measures for those impacts determined to be significant, and delineates those impacts that are concluded to remain significant and unavoidable. In the decision-making process for a proposed project where the EIR has concluded that project implementation would have an unavoidable significant impact on the environment, CEQA requires the decision-making agency to make specific findings regarding such impacts and to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks. The unavoidable significant impacts of the Bradley West Project, including traffic impacts at the thirteen intersections where no feasible mitigation measures are available, will be considered by the LAWA Board of Airport Commissioners when deciding whether to approve the project.

BWP-PC00009-10

Comment: Noise: TBIT 4.8: The proposed parking/construction staging area located to the north of LAX Runway 24R is unsuitable and should not be used, especially as it would involve noise and surface traffic impacts due to vehicles passing through the Westchester and Playa del Rey communities. Parking at the west end of the airport, accessed by the 105 Freeway and Imperial Highway is preferable. If more area is needed, Lot B and/or areas adjacent to the Green Line Station should be utilized.

Off-Airport Surface Transportation: TBIT 4.2, 4.3: The proposed parking/construction staging area located to the north of LAX Runway 24R is unsuitable and should not be used, especially as it would involve noise and surface traffic impacts due to vehicles passing through the Westchester and Playa del Rey communities. Parking at the west end of the airport, accessed by the 105 Freeway and Imperial Highway is preferable. If more area is needed, Lot B and/or areas adjacent to the Green Line Station should be utilized.

Response: The comment is noted. Please see Topical Response TR-BWP-ST-1 regarding the refinement and additional evaluation of Alternative 4: Construction Staging/Parking Areas-Optimize Use of West Construction Staging Area to Include Worker Parking. This alternative was designed in response to comments received on the NOP and Draft EIR for the Bradley West Project and provides an alternative to the proposed use of the Northwest Construction Staging/Parking Area, the East Contractor Employee Parking Area, or the Southeast Construction Staging/Parking Area as the primary parking area for project construction workers. Under Alternative 4, the West Construction Staging Area would be expected to fully meet typical parking demands and would not require the use of any other contractor employee parking areas. However, in the event additional parking is needed, the excess demand would be accommodated at the East Contractor Employee Parking Area located to the north of LAX Public Parking Lot B, or if unavailable, by the Southeast Construction Staging/Parking Area at Imperial Highway and Aviation Boulevard. (Please see Topical Response TR-BWP-ST-1; see also Bradley West Project Draft EIR Figures 4.3-4 and 2-8.)

BWP-PC00009-11

Comment: Population, Housing, Employment and Growth-Inducement: TBIT 5.2: Due to the noise and congestion from increased surface traffic to support the additional air traffic capacity at TBIT, housing prices could be adversely affected. Additional air traffic noise could also affect housing sales and prices.

Response: The comment is noted. As indicated in on page 2-43 in Chapter 2 of the Bradley West Project Draft EIR, the proposed improvements would not increase or otherwise affect the overall operational capacity of LAX. The Bradley West Project would not alter airspace traffic, runway operational characteristics, or the practical capacity of the airport.

The surface transportation impacts associated with the Bradley West Project were addressed in Sections 4.1, 4.2, and 4.3 of the Bradley West Project Draft EIR.

Economic changes that may result from a project are not treated as significant effects on the environment under CEQA (CEQA Guidelines §15064 (e)). Therefore, an analysis of project impacts on single-family property values is not required. However, the LAX Master Plan Final EIR addressed the Master Plan's potential to impact residential property values. Overall, LAX has not prevented an increase over time in the value of homes in the general airport vicinity, and implementation of the LAX Master Plan is not expected to adversely impact home values (see LAX Master Plan Final EIR, Part II, Volume I, page 2-29). See Topical Response TR-ES-1: Residential Property Values, in the LAX Master Plan Final EIR for further discussion of this issue (LAX Master Plan Final EIR, Part II, Volume I, pages 2-22 through 2-31).

BWP-PC00009-12

Comment: Air Quality: TBIT 4.4: All studies pertaining to particulate matter should include matter that is below P2.5. If the studies done for the LAX Master Plan EIR did not study the potential effects of this smaller particulate matter, new studies must be done.

Response: The U.S. EPA finalized adoption of the first PM2.5 National Ambient Air Quality Standards (NAAQS) in July 1997, with clarifying amendments in July 2004. In January 2005, after at least three years of measuring and studying PM2.5 concentrations across the country, U.S. EPA designated the attainment status of each air district relative to PM2.5. At that time, the South Coast Air Basin (Basin), in which LAX is located, was designated as a non-attainment area for PM2.5. The State of California has also adopted state ambient air quality standards for PM2.5, and the Basin has been designated non-attainment for the state standards as well. The development of these standards was based on the impact of PM2.5 to human health and welfare, as determined by numerous studies over several decades. It should be noted that PM2.5 refers to particles with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers. Therefore, the term PM2.5 includes the smaller particles referred to by the commentor.

In addition, the SCAQMD had researched PM2.5 concentrations in the Basin and the relationship between PM2.5 emissions and potential concentrations. Therefore, after the area was designated non-attainment, SCAQMD identified project-level PM2.5 emission rates and project-level PM2.5

concentrations that would be considered significant under CEQA. No such standards currently exist for smaller ultra fine particulates (UFP, particles less than 0.1 micrometers in aerodynamic diameter) within the context of a CEQA evaluation. It should be noted that these thresholds apply to each project that undergoes a CEQA review and analysis. The PM2.5 significance thresholds for emissions were included in Table 4.4-4 (page 4-253), and those for concentrations were included in Table 4.4-5 (page 4-254) of the Bradley West Project Draft EIR.

The air quality impact analysis conducted for the Bradley West Project Draft EIR studied the emissions and resulting concentrations of all criteria air pollutants, including PM2.5. The results are summarized in Section 4.4.6 (beginning on page 4-257), and detailed calculation tables are presented in Appendix E of the Bradley West Project Draft EIR. Additional studies of PM2.5 for this project are not necessary. Parallel to air quality evaluations conducted for the Bradley West Project, LAWA is currently conducting an Air Quality Source Apportionment Study that will monitor and analyze UFP emanating from airport sources, as well as other sources in the vicinity of the airport.

BWP-PC00009-13

Comment: In addition, studies must include increased traffic and engine idling to do traffic stoppages in the Central Terminal Area due to additional surface traffic that will result from increased air traffic capacity at TBIT.

Response: As described in Section 2.4.5 of the Bradley West Project Draft EIR, implementation of the proposed project would not result in any notable increase in aircraft operations and passenger levels at LAX than would otherwise occur if the project was not implemented. Section 4.1 of the Draft EIR addresses the on-airport traffic conditions anticipated to occur in 2013 when the proposed project is completed. Please see Response to Comment BWP-PC00011-29 for further discussion of this issue. Please see Section 4.4 of the Bradley West Project Draft EIR, which addresses the potential air quality impacts of the project.

BWP-PC00009-14

Comment: Hydrology/Water Quality: TBIT 5.3: Due to recent seismic activity in the area and the age and location of underground conduits, such as large sewer pipes, there is a potential for ground slippage and/or movement, both during and after construction. These potential impacts must be thoroughly studied.

Response: As discussed in Section 2.4.1.7 in the Bradley West Project Draft EIR, the Bradley West Project site extends across an area that contains various subsurface and above-ground utility lines and facilities, including those related to storm drain, sewer, water, electricity, natural gas, oil and fuel, and communications. Implementation of the Bradley West Project would require the relocation or modification of some lines, and may include the upgrading of lines to meet current code requirements and to function more efficiently. Utility lines in the Bradley West Project area that have been identified as requiring relocation are identified in Table 2-2 and illustrated in Figure 2-6 of the Bradley West Project Draft EIR. As discussed in Section 5.12 of the Bradley West Project Draft EIR, in accordance with LAX Master Plan Commitment PU-1, LAWA will develop and implement a utilities relocation program to minimize interference with existing utilities associated with construction of the Bradley West Project.

Section 5.10 of the Bradley West Project Draft EIR addresses the potential for construction of the Bradley West Project to increase the consequences of adverse geologic conditions and hazards, such as earthquake-induced ground shaking, earthquake fault surface rupture, earthquake-induced liquefaction and settlement, non-seismic settlement, expansive soils, slope stability, and oil field gasses and cause potential impacts such as substantial damage to structures or infrastructure, and exposure of people to substantial risk of injury resulting from a geologic hazard. As indicated on page 5-88 of the Bradley West Project Draft EIR, a site-specific soils and geotechnical investigation would be prepared for the Bradley West Project, which would provide the basis for a detailed grading plan, as well as detailed design of foundations and seismic requirements. The new structural elements would be designed to meet current seismic requirements. The site-specific soils and geotechnical investigation and the design and implementation of the recommended remedial

and protective construction methods would reduce other potential geologic hazards, including slope stability, oil field gas, and groundwater/dewatering, settlement, seismic slope settlement, and off-site erosion, to a level that is less than significant. As such, the Bradley West Project would not result in substantial damage to and would not have a significant impact on structures or infrastructures, or exposure of people to substantial risk of injury, as a result of the creation or acceleration of a geologic hazard.

BWP-PC00009-15

Comment: Endangered and Threatened Species of Flora and Fauna: TBIT 5.5: The wording in Table 1-1 on page 1-16 is confusing. What wet season was used for the surveys on Riverside fairy shrimp in the ponded areas? The statement here seems to say that statistics from the year 2009 were used for "wet season surveys." 2009 is one of the driest years on record and data based on 2009 records should not be used in any "wet season survey."

Response: Wet season surveys for Riverside fairy shrimp were conducted in accordance with U.S. Fish and Wildlife Service (USFWS) protocols for this species, which require that pools be monitored once they hold "greater than 3 cm of standing water 24 hours after a rain event." All pools that were monitored met this requirement after at least one of the rain events during the wet season survey period. The USFWS has the discretion to reject surveys if, in its judgment, precipitation in a given year would not provide adequate inundation for presence/absence surveys. The precipitation totals for the 2008-2009 wet season were adequate for the USFWS to accept the data that were obtained from the surveys. While overall rainfall may have been below normal for the LAX area during the 2008/2009 season, the precipitation amounts in the months of December (2.51 inches, 1.79 inches above normal) and in February (3.41 inches, 0.30 inches above normal) were above normal and rainfall events during the season resulted in ponding to a sufficient depth for the purposes of the wet season surveys for Riverside fairy shrimp. In accordance with USFWS protocol, an additional wet season survey will be conducted during the 2009-2010 season, or a dry season survey will be conducted, before a final presence/absence conclusion for Riverside fairy shrimp is reached for the Bradley West Project.

BWP-PC00009-16

Comment: Energy Supply and Natural Resources: TBIT 5.7: What will be the impact of the additional energy consumption due to the enlargement on TBIT? Although energy conservation measures were "recommended" in the MP EIR, this does not guarantee that they will be implemented in the TBIT project as they must be.

Response: Impacts associated with energy consumption are discussed in Section 5.7 of the Bradley West Project Draft EIR. As described on page 5-72, the estimated diesel and gasoline consumption resulting from construction equipment and construction-related vehicle trips would be approximately 1.825 million gallons and 665,000 gallons, respectively. The new construction is planned to be built to the U.S. Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED) green building rating system at a silver rating. Under the LEED Silver rating, a 9 percent increase in energy efficiency is assumed over California's Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6). By incorporating LEED standards, the new Bradley West Project building area would achieve greater energy efficiency than the existing facility. However, the proposed increase in total floor area within TBIT from 997,120 square feet to 2,024,110 square feet would still cause an associated increase in energy consumption compared to existing conditions. Taking into account LEED standards and the increased building area, operation of the proposed project would result in a net increase in electricity demand of approximately 6,400 mega watt hours (MWh)/year over existing electricity demand. Operation of the proposed project would also result in a net increase in natural gas demands by approximately 12 million cubic feet (MMCF)/yr. As described on page 5-73 of the Bradley West Project Draft EIR, sufficient supply of natural gas and electricity is expected to be available for project operations. Operation of the project would not result in an exceedance in regional electricity and natural gas supplies or generation or distribution facilities due to project-related electricity and natural gas demand.

The LAX Master Plan EIS/EIR was completed at a program-level. As discussed in Section 5.7.4.1 of the Bradley West Project Draft EIR, no significant impacts to energy resources were identified. Nevertheless, the LAX Master Plan EIR presented a range of mitigation measures and commitments that could be approved and implemented to reduce or avoid environmental impacts. Pursuant to Section 21081.6(a) of CEQA, LAWA adopted a mitigation monitoring and reporting program (MMRP) for the LAX Master Plan. The purpose of the LAX Master Plan MMRP is to define what agency is responsible for each mitigation measure and commitment required as a condition of project approval, when that measure or commitment must be implemented and what criteria are used to determine whether the measure or commitment is being implemented and is effective. The LAX Master Plan MMRP is a means to ensure compliance with mitigation measures and commitments during project implementation. The LAX Master Plan MMRP is available at http://www.ourlax.org/publications.cfm. Compliance with the LAX Master Plan MMRP is documented in LAWA's LAX Master Plan Mitigation Monitoring and Reporting Program Progress Report, which is prepared on an annual basis and available to the public at http://www.ourlax.org/publications.cfm.

As individual projects of the LAX Master Plan, such as the Bradley West Project, are advanced for implementation and future environmental evaluation occurs, appropriate, feasible mitigation measures are identified. As described above, construction and operation of the Bradley West Project would not result in significant impacts to energy consumption. However, as indicated on page 5-71 of the Bradley West Project Draft EIR, LAX Master Plan Commitment E-1, Energy Conservation and Efficiency Program, is also applicable to the Bradley West Project.

Compliance with Master Plan Commitment E-1, as well as all other applicable LAX Master Plan commitments and mitigation measures and project-specific mitigation measures that are identified in the Bradley West Project EIR and are carried forward as conditions of project approval, will be included in a Bradley West Project MMRP, which will be monitored by LAWA or a qualified third party. Compliance with the Bradley West Project MMRP will be documented in LAWA's LAX Master Plan Mitigation Monitoring and Reporting Program Progress Report.

BWP-PC00009-17

Comment: Solid Waste: TBIT 5.8: Waste reduction measures were recommended in the MP EIR. They must be included as mandatory rather than recommended in the TBIT Draft EIR.

Response: The LAX Master Plan EIR identified commitments that could be approved and implemented to reduce or avoid environmental impacts associated with the generation of solid waste. Pursuant to Section 21081.6(a) of CEQA, LAWA adopted a mitigation monitoring and reporting program (MMRP) for the LAX Master Plan incorporating Master Plan commitments to address solid waste impacts. The purpose of the LAX Master Plan MMRP is to define what agency is responsible for each mitigation measure and commitment required as a condition of project approval, when that measure or commitment must be implemented and what criteria are used to determine whether the measure or commitment is being implemented and is effective. The LAX Master Plan MMRP is a means to ensure compliance with mitigation measures and commitments during project implementation. The LAX Master Plan MMRP is available at http://www.ourlax.org/publications.cfm. Compliance with the LAX Master Plan MMRP is documented in LAWA's LAX Master Plan Mitigation Monitoring and Reporting Program Progress Report, which is prepared on an annual basis and available to the public at http://www.ourlax.org/publications.cfm.

As indicated on page 5-77 of the Bradley West Project Draft EIR, LAX Master Plan Commitments SW-1, Implement an Enhanced Recycling Program, SW-2, Requirements for the Use of Recycled Materials During Construction, and SW-3, Requirements for the Recycling of Construction and Demolition Waste, are applicable to the Bradley West Project. These commitments will be included in the MMRP for the Bradley West Project. Please see Response to Comment BWP-PC00009-16 for additional discussion of the Bradley West Project MMRP.

BWP-PC00009-18

Comment: Earth and Geology:; TBIT 5.10. In light of the recent earthquake activity that was centered in Lennox and Inglewood, two communities that are adjacent to LAX, new studies need to be done to determine potential impacts related to geotechnical issues, such as earthquakes and other seismic-related hazards, ground failure, and landslides.

Response: Please see Response to Comment BWP-PC00009-14 regarding geologic hazards.

A complete description of existing faults and seismic hazards is provided in Section 4.22, Earth/Geology, of the LAX Master Plan EIR, from which the Bradley West Project Draft EIR was tiered. The LAX Master Plan EIR identified active faults and geologic hazards in the vicinity of LAX (refer to Figure F4.22-2). As indicated in the LAX Master Plan EIR, the LAX Master Plan projects have the potential to expose people and facilities to seismic hazards, including ground failure hazards and landslides. These are conditions that exist throughout the Los Angeles region, and are not unique to the project area. However, potential impacts would be minimized to a less than significant level by designing structures according to the Uniform Building Code and the City of Los Angeles Building Code.

The recent seismic activity in the vicinity of Lennox and Inglewood is consistent with the analysis provided in the LAX Master Plan EIR, and does not alter the conclusions of that analysis relative to significant impacts. As indicated in Section 5.10.5 of the Bradley West Project Draft EIR, the proposed project would not result in substantial damage to, and would not have a significant impact on, structures or infrastructures, or exposure of people to substantial risk of injury, as a result of the creation or acceleration of geologic hazard. Therefore, no significant earth/geology-related impacts would occur as a result of the Bradley West Project and no new studies are required to determine potential impacts related to geotechnical issues.

BWP-PC00009-19

Comment: Hazards and Hazardous Materials: TBIT 5.11: There may be potential danger from hazards and hazardous materials due to seismic activity, which could expose sewage and/or fuel leakage due to ruptured lines or pipes. These potential hazards must be studied for this project.

Response: Please see Response to Comment BWP-PC00009-14 regarding geologic hazards.

Potential impacts associated with hazardous materials use and storage; hazardous waste generation, transport, and disposal; soil and groundwater contamination and remediation operations that may occur as a result of construction of the Bradley West Project were addressed in Section 5.11 of the Bradley West Project Draft EIR, which is tiered from the LAX Master Plan Final EIR. As indicated on page 4-1286 of the LAX Master Plan Final EIR, the handling and storage of hazardous substances, including the conveyance/transport of substances via pipeline is stringently regulated. Releases of hazardous materials are subject to stringent regulations, including emergency response and cleanup procedures. LAWA has procedures already in place to reduce hazardous materials-related incidents and spills. If a spill were to occur, emergency response procedures would be implemented to contain and clean up the spill. These regulations and provisions are in place so potential spills and releases would not create a hazard to the public or the environment.

BWP-PC00009-20

Comment: Human Health Risks: TBIT 4.5: New studies on potential air pollution are needed to include particulate matter under P2.5.

Response: Please see Response to Comment BWP-PC00009-12 regarding analysis of PM2.5 in the Bradley West Project Draft EIR.

BWP-PC00009-21

Comment: Public Services: TBIT 5.13, 5.14: Potential aircraft noise impacts on schools especially Westchester High School, St. Bernards, and others in Westchester; parks, such as Westchester and Neilson; and the Inglewood and Westchester Libraries must be delineated. Anticipated time-frames within the project when these impacts would occur should be identified and plans incorporated to provide public notice to the communities and public services before and during such impacts. Procedures for providing information to the surrounding communities regarding runway closures and increased air traffic on runways due to the TBIT construction must also be included. In addition, whenever a construction project is undertaken there is always a potential for police or fire services. Public notice to these agencies must be provided before and during impacts.

Response: Potential aircraft-related noise impacts on area schools associated with the LAX Master Plan, of which the Bradley West Project is a part, were addressed in Sections 4.1 and 4.2 of the LAX Master Plan Final EIR. As indicated on page 4-364 in Chapter 4 of the Bradley West Project Draft EIR, implementation of the Bradley West Project would not materially affect the overall airport noise contours for LAX that are reflected in the LAX Master Plan Final EIR. Those contours are defined primarily by aircraft takeoff and landing operations, which would not be affected by the Bradley West Project. The Bradley West Project would not cause an increase in the number of daily flights arriving and departing from LAX, and the ambient growth in aviation activity at LAX that is projected to occur between 2008 and 2013, independent of the Bradley West Project, is below the future activity level addressed in the LAX Master Plan Final EIR.

No runway closures are anticipated to be required for construction of the Bradley West Project. Nor would the proposed improvements of the Bradley West Project increase or otherwise affect the overall operational capacity of LAX, nor result in notable changes of the CNEL contours of aircraft flight, as noted in Table 1.1 on page 1-13 of the Bradley West Project Draft EIR. Further, as indicated in on page 2-43 in Chapter 2 of the Bradley West Project Draft EIR, the proposed improvements would not increase or otherwise affect the overall operational capacity of LAX. The Bradley West Project would not alter airspace traffic, runway operational characteristics, or the practical capacity of the airport.

In accordance with LAX Master Plan Commitment C-1, LAWA has established a Ground Transportation/Construction Coordination Office for construction projects at LAX. The Ground Transportation/Construction Coordination Office is responsible for coordinating with police and fire personnel regarding maintenance of emergency access and response times during construction of projects at the airport.

BWP-PC00009-22

Comment: Climate Change/Greenhouse Gas: TBIT 4.6: The potential impact from climate change and/or greenhouse gas emissions must be studied, based on the most current technology.

Response: Section 4.6 of the Bradley West Project Draft EIR addresses the project-related impacts associated with global climate change. Section 4.6.6.3 addresses potential impacts to climate change in terms of the nature and amount of greenhouse gas that would be generated from construction and operation of the project. Potential impacts from global climate change are addressed in Section 4.6.6.4 relative to future sea level rise, reduced snow pack resulting in changes to existing water resources, increased risk of wildfires, and public health hazards associated with higher temperatures, heat waves, and decreased air quality. The analysis utilized the most up-to-date technology to assess the amount of greenhouse gas emissions. The models used were URBEMIS version 9.2.4 and EMFAC 2007.

BWP-PC00010 Roberts, William R. Westchester Democratic Club 6/19/2009

BWP-PC00010-1

Comment: The Westchester Democratic Club submits the following comments regarding the Draft Environmental Impact Report (Draft EIR) for the Tom Bradley International Terminal (TBIT) Reconfiguration Project.

Our Club includes residents primarily from Westchester, but also has members from Playa del Rey and other surrounding communities.

Our members are concerned about construction traffic into and through our areas and strongly recommend that the proposed Northwest Construction Staging/Parking Area be deleted. We also do not support the proposed Southeast Construction Staging/Parking Area as an appropriate location for construction staging and parking. We do suggest, however, that LAWA use the West Construction Staging Area for construction staging and parking during the five and one-half years of the TBIT Reconfiguration Project and that traffic be encouraged to use the 105 Freeway and Imperial Highway to access the location. If this area is not sufficient, then Lot B and/or the area near the Green Line Station should be utilized.

Response: The comment is noted. Please see Topical Response TR-BWP-ST-1 regarding the refinement and additional evaluation of Alternative 4: Construction Staging/Parking Areas-Optimize Use of West Construction Staging Area to Include Worker Parking. This alternative was designed in response to comments received on the NOP and Draft EIR for the Bradley West Project and provides an alternative to the proposed use of the Northwest Construction Staging/Parking Area, the East Contractor Employee Parking Area, or the Southeast Construction Staging/Parking Area as the primary parking area for project construction workers. Under Alternative 4, the West Construction Staging Area is expected to fully meet typical parking demands and would not require the use of any other contractor employee parking areas. However, in the event additional parking is needed, the excess demand would be accommodated at the East Contractor Employee Parking Area located to the north of LAX Public Parking Lot B, or if unavailable, by the Southeast Construction Staging/Parking Area at Imperial Highway and Aviation Boulevard. (Please see Topical Response TR-BWP-ST-1; see also Bradley West Project Draft EIR Figures 4.3-4 and 2-8.) As indicated in Section 6.4.3.4 of the Bradley West Project Draft EIR, workers commuting to the West Construction Staging Area would use Imperial Highway or Westchester Parkway to reach the staging area on Pershing Drive. Exclusive use of the West Construction Staging Area would reduce the amount of traffic using Westchester Parkway because workers coming from the south would be expected to use Imperial Highway to reach the Pershing Drive entrance to the West Construction Staging Area rather than Westchester Parkway to reach the Northwest Construction/Staging Area. However, some workers coming from the north would still be expected to use Westchester Parkway to reach the West Construction Staging Area on Pershing Drive. As indicated in Section 6.4.3.4 of the Bradley West Project Draft EIR, construction-related traffic impacts would be the same whether the West Construction Staging Area or the Northwest Construction Staging/Parking Area is used. Significant construction-related impacts would be reduced to a less than significant level with implementation of the mitigation measures identified in the Bradley West Project Draft EIR.

BWP-PC00010-2

Comment: There is a definite need to modernize TBIT. It is inadequate for current and near-future air traffic. However, it is We are concerned that the that the new TBIT as outlined in the Draft EIR will not be adequate to accommodate the number of passengers that can realistically be expected in five and one-half years. The proposal must be modified to adequately accommodate large numbers of passengers arriving or departing at the same time unless these increased traffic figures can be minimized through regionalization..

Response: The comments regarding the need to modernize TBIT are noted. Please see Responses to Comments BWP-PC00002-2 and BWP-PC00008-2 regarding the number of passengers per aircraft and the sizing of the proposed facilities to accommodate A380 and other new generation aircraft. Please see Response to Comment BWP-AL00005-5 regarding regional solutions to air transportation.

BWP-PC00010-3

Comment: As noted on Table 1-2, page 1-22 and page 2-44 of the Draft EIR, LAWA anticipates an increase in international air traffic by the year 2013 (regardless of whether the Draft EIR for TBIT is approved and the reconfiguration project undertaken). For security, efficiency, and environmental reasons, LAWA must concurrently take steps to achieve actual regionalization of air transportation in the Los Angeles basin. This should include well-publicized incentives to relocate air traffic to Ontario - including international flights to Canada and Mexico. Disincentives for domestic air traffic at LAX should also be included along with incentives for airlines and passengers to utilize other airports..

A regional approach to air transportation is the only solution for mitigating the transportation, security, and environmental problems that are currently impacting our greater-LAX area. As air traffic increases, these impacts will increase dramatically and must be shared throughout the Southern California region. Only in that manner will we continue to enjoy economic benefits without unduly impacting one portion of the Southern California community. Regionalization must be our ultimate goal.

Response: The comment is noted. Please see Response to Comment BWP-AL00005-5 regarding regional solutions to air transportation.

BWP-PC00010-4

Comment: Please let us know what action is being taken to address our concerns.

Response: In accordance with CEQA Guidelines §15088, LAWA has prepared written responses to all comments received on the Bradley West Project Draft EIR. These responses are provided herein as part of this Final EIR. Please see Responses to Comments BWP-PC00010-1 through BWP-PC00010-3 for written responses addressing your concerns. The responses to comments on the Bradley West Project Draft EIR will be considered by the decision-makers during project deliberations.

BWP-PC00011 Schneider, Denny ARSAC 6/21/2009

BWP-PC00011-1

Comment: The Board of ARSAC (A Regional Solution to Airport Congestion) submits the following suggestions in response to the subject project.

LAX has been without adequate maintenance since the 1984 upgrades that added the upper roadway to the Central Terminal Area. ARSAC believes that the rebuilding of TBIT is long overdue and supports the concept of improving LAX safety, security, and the passenger experience. We provide the following comments to the subject draft EIR. The comments highlight two procedural issues related to this project and seven primary questions about the project and its impacts followed by detailed questions about specific items in the DEIR document.

Response: The comment is noted. Please see Responses to Comments BWP-PC00011-2 through BWP-PC00011-55 below.

BWP-PC00011-2

Comment: To mitigate the environmental impact of this project, the operating/construction directives for controlling air pollution, noise, dust, hours of operation, construction workers parking and transportation, and disturbance for neighboring communities that were specified for the SAIP should again be incorporated into the EIR for this project with strict enforcement measures included.

Response: The SAIP EIR, similar to the Bradley West Project EIR, was tiered from the LAX Master Plan. The SAIP EIR proposed to construct a new 75-foot wide parallel taxiway between the two south airfield runways to meet the LAX Master Plan objectives. Several additional mitigation measures were provided in the SAIP EIR to deal with the specific effects of the SAIP. For example "MM-BC (SA)-1. Replacement of Habitat Units Associated with the South Airfield Improvement Project." (SAIP EIR page IV-250.) Mitigation measures such as this, were designed to address site specific impacts of the SAIP. Such impacts would not occur under the Bradley West Project which deals with a different geographic location. Therefore, such mitigation measures are not needed. However, the Bradley West Project incorporates applicable LAX Master Plan commitments and mitigation measures, as were required in the SAIP EIR. As discussed below, all applicable LAX Master Plan commitments and mitigation measures have been incorporated as part of the Bradley West Project and SAIP.

Section 4.3.7, Section 4.4.5, and Section 4.8.5 of the Bradley West Project Draft EIR identify LAX Master Plan commitments and mitigation measures that serve to reduce construction-related traffic, fugitive dust, and noise impacts to surrounding areas, respectively.

Measures specific to addressing traffic impacts would be included in the Construction Traffic Management Plan (CTMP) required under LAX Master Plan Commitment ST-18, which must be submitted by the Bradley West Project contractor to LAWA at the beginning of the project. The Bradley West Project CTMP will detail the designated haul routes for construction traffic, deliveries, and construction employee trips. The Bradley West Project CTMP will also designate construction employee shift hours that do not coincide with the heaviest commuter traffic periods (7:00 a.m. to 9:00 a.m., and 4:30 p.m. to 6:30 p.m.) in accordance with LAX Master Plan Commitment ST-14.

Measures specific to addressing fugitive dust emissions would be included in the Fugitive Dust Control Plan (FDCP), which must be submitted by the Bradley West Project contractor to LAWA at the beginning of the project. The Bradley West Project FDCP will provide specific requirements to control fugitive dust emissions in compliance with Rule 403 of the South Coast Air Quality Management District (SCAQMD).

Measures specific to addressing construction noise would be included in the Construction Noise Control Plan (CNCP) required under LAX Master Plan Mitigation Measure MM-N-7, which must be submitted by the Bradley West Project contractor to LAWA at the beginning of the project. The CNCP will specify feasible measures to reduce potential noise impacts throughout the construction of the Bradley West Project. The Bradley West Project CNCP will incorporate the requirements for construction scheduling as specified in LAX Master Plan Mitigation Measure MM-N-10, which recognizes noise sensitive hours as being nighttime and early morning, and anytime on Sundays and holidays.

These Master Plan commitments and mitigation measures are the same as those required during construction of the South Airfield Improvement Project and the Crossfield Taxiway Project.

In addition, as described in Section 4.6 of the Bradley West Project Draft EIR, the Bradley West Project would comply with LAWA's Sustainable Airport Planning, Design and Construction Guidelines that serve to reduce greenhouse gas emissions.

BWP-PC00011-3

Comment: Procedural issues:

1. Disagreement remains as to the adequacy of the project level EIR tiered off of the 2004 Alternative D EIR which incorporates "all by reference" without including project detail information into this project level EIR. The initial Project summary failed to address the 2004 Stipulated Settlement Agreement but it is mentioned subsequently. The Stipulated Settlement agreed that certain projects could go forward with basic study per the LAX Specific Plan. There was general agreement that these were necessary projects pending establishment of the details. Adequacy of the Program level EIR data has been consistently challenged and not accepted as a specific element of the settlement. (See page 1-9 and many others.)

Response: The commentor's opinion regarding the adequacy of the LAX Master Plan EIR is noted. Please see Sections 1.2 through 1.2.3 of the Bradley West Project Draft EIR for details regarding the relationship between the Bradley West Project EIR and the LAX Master Plan EIR and the tiering methodology used in this EIR.

This comment also states that the EIR incorporates "'all by reference' without including project detail information into this project level EIR." As discussed in Section 1.2.3 of the Bradley West Project Draft EIR, "recent development of detailed design, engineering, and construction plans for the Bradley West Project provides information that was not available at the time of the LAX Master Plan EIR. Such new information now allows for a more detailed evaluation of certain impacts, particularly those that are construction related, and the relatively new practice of addressing impacts associated with greenhouse gases." More detailed information on the proposed project is included in Chapter 2, Project Description, including construction phasing in Section 2.4.3. Other sections, such as the Construction Surface Transportation Section (Section 4.3), provide more detailed information on the project in comparison to the level of detail in the LAX Master Plan EIR. For example, Section 4.3.4 of the Bradley West Project Draft EIR provides detailed information on the number of construction trips generated by the Bradley West Project, which is incorporated into the impact analysis. The impact analysis also takes into account the phasing of other related projects, as is described and depicted in Section 4.3.5 and Figure 4.3-5 of the Bradley West Project Draft EIR, respectively. Additional revised information is considered and analyzed in the impact analyses throughout the Bradley West Project Draft EIR.

The commentor also states that the "initial Project summary failed to address the 2004 Stipulated Settlement Agreement but it is mentioned subsequently." It is not clear what "initial Project summary" references. The Stipulated Settlement is discussed in the Introduction/Executive Summary (Bradley West Project Draft EIR, Chapter 1), in the Project Description (Bradley West Project Draft EIR, Chapter 2) and page 8 of the Notice of Preparation/Initial Study. (See specifically pages 1-9, 1-21, 2-2, 2-44 of the Bradley West Project Draft EIR.) There are no requirements under CEQA which would necessitate discussion of the Stipulated Settlement in the NOP or Initial Study (see CEQA Guidelines Sections 15063 and 15082).

The commentor also states that the "adequacy of the Program level EIR data has been consistently challenged and not accepted as a specific element of the settlement." As discussed in the Stipulated Settlement, "Except as otherwise specifically set forth in this Settlement, Petitioners waive any and all rights they have or may have under California Civil Code Section 1542 and/or any successor section to it with respect to the Released Claims. In connection with this waiver, Petitioners acknowledge that they are aware that they may hereafter discover claims presently unknown or unsuspected or facts in addition to or different from those that they now know or believe to be true with respect to the subject matter of this Settlement. Nevertheless, Petitioners intend by this Settlement, and with and upon the advice of their own independently selected counsel, to release fully, finally and forever all Released Claims." (Stipulated Settlement, subsection II.B.)

"'Released Claims' mean any and all state and/or federal law based suits, petitions, claims or causes of action challenging the sufficiency or legal validity of the LAX Master Plan Program . . . Notwithstanding the foregoing, the Released Claims shall not include any state law based suits, petitions, claims or causes of action challenging the sufficiency or legal validity of the Yellow Light Projects." (Stipulated Settlement, page 4.) "'LAX Master Plan Program' means the entire program that comprises the approval by both the Los Angeles City Council and the FAA in its ROD, and subsequent implementation of Alternative D…" As discussed on pages 3-75 and 3-82 and shown in Figure 3-14 of the LAX Master Plan EIR, respectively, the Bradley West Project is part of Alternative D; it is not a "Yellow Light Project."

The Stipulated Settlement also states, "Petitioners will not directly or indirectly file, prosecute, bring, encourage, participate in, facilitate or advance any suit, claim or legal action of any kind against Respondents or the FAA based upon any Released Claims." (Stipulated Settlement, subsection II.C.)

BWP-PC00011-4

Comment: 2. Public outreach on this project was poorly orchestrated. The public notice for the comment meetings were sent out buried with the text of a full page notice of small type. The meeting notice was also not accessible on the LAWA website.

Response: Notification of the public meetings on the Bradley West Project Draft EIR was provided in a number of ways and exceeded the noticing requirements of CEQA (CEQA Guidelines Section 15087(a)). Notices of the meetings were sent to an extensive mailing list that included the commentor. In addition, notices were sent by the LAWA Stakeholder's Office to over 8,000 individuals. In compliance with CEQA Guidelines Section 15087(c), notice to the public must include, among other things, a brief description of the project and its location as well as a list of anticipated significant environmental effects. In addition to containing information pertaining to the proposed project, the notices contained information pertaining to the LAX Compliance Review process. As such, the information would not fit on a postcard and was instead provided on an 8½" by 11" sheet of paper. The format of the notice was identical to that provided on postcards that LAWA has used for previous notifications, with the exception of the greater length. Information pertaining to the public meetings was introduced by the words "Public Meetings" printed in capital letters and boldface type. In addition to the mailed notices, notification was published in three local newspapers (the Los Angeles Times, the Argonaut and the Daily Breeze). The Argonaut published an article containing the dates of the public meetings on May 19, 2009.

BWP-PC00011-5

Comment: Project related issues and/or analysis issues:

1. The creation and use of a parking lot along Westchester Parkway for construction worker staging is unacceptable. Comments to this were provided in the NOP. Any workable solution should include access via a gate off the 105 freeway/Imperial beyond Main Street which directs traffic along the inside of the airport property.

Response: The commentor's opposition to the use of the Northwest Construction Staging/Parking Area along Westchester Parkway is noted. Please see Response to Comment BWP-PC00005-2 regarding a description of the construction staging/parking areas considered and addressed in the Bradley West Project Draft EIR. Alternative 4 in the Bradley West Project Draft EIR would use the West Construction Staging Area as the primary location for contractor employee parking. Please see Topical Response TR-BWP-ST-1 regarding the refinement and additional evaluation of Alternative 4: Construction Staging/Parking Areas-Optimize Use of West Construction Staging Area to Include Worker Parking. This alternative was designed in response to comments received on the NOP and Draft EIR for the Bradley West Project and provides an alternative to the proposed use of the Northwest Construction Staging/Parking Area, the East Contractor Employee Parking Area, or the Southeast Construction Staging/Parking Area as the primary parking area for project construction workers. Utilizing an airport gate to direct construction traffic onto airport property would pose problems relative to the vehicle queuing areas and personnel logistics needed to screen/inspect each and every vehicle and worker entering airside areas of the airport, as compared to the currently proposed staging/parking areas and initial vehicle access points that would be set up as landside facilities. The formation of vehicle queues, including cars and trucks, associated with the additional screening requirements would result in increased air quality impacts as well as traffic impacts if the queue extends back into travel lanes. In summary, such an arrangement would be infeasible and would result in air quality and traffic impacts that would not otherwise occur under the proposed project. Therefore, LAWA is not required to analyze this gate arrangement as a mitigation measure or alternative. (See CEQA Guidelines, Sections 15126.4 (a), 15126.6 (a).)

BWP-PC00011-6

Comment: 2. Overlap of construction schedules between TBIT and crossfield could restrict movements between north and south airfield complexes. The scheduling must be resolved. This could cause additional work for controllers, cause confusion for pilots, and can lead to an increase in incursions.

Response: Please see Response to Comment BWP-PC00009-5 regarding coordination of construction plans for the Crossfield Taxiway Project and the Bradley West Project, including frequent briefings with FAA Air Traffic Control Tower personnel.

BWP-PC00011-7

Comment: 3. The construction area involved has long been subject to fuel spills and other toxic materials. We urge additional actions to avoid any possibility of toxic fugitive dust.

Response: The comment is noted. As indicated on page 5-98 in Chapter 5 of the Bradley West Project Draft EIR, historical activities in the vicinity of the Bradley West Project site have resulted in contamination or the potential for contamination in the project area. Recent site investigations confirm that contamination would be encountered during construction of the Bradley West Project.

Grading in areas with known soil contamination could expose construction workers to hazardous materials. In addition, it is possible that, during other construction activities for the Bradley West Project, previously unidentified soil and/or perched groundwater contamination could be encountered. Worker health and safety and the environment would be protected to the maximum extent possible by strictly adhering to the safety measures required by local, state, and federal laws and regulations that govern contaminated materials encountered during construction. In addition, LAX Master Plan Commitment HM-2, Handling of Contaminated Materials Encountered During Construction, was designed to ensure that any potential effects from contaminated materials encountered during construction would be less than significant. In order to facilitate the implementation of this LAX Master Plan commitment, in 2005 LAWA adopted the "Procedure for the Management of Contaminated Materials Encountered During Construction" ("Procedure") for application to all LAX Master Plan projects. This Procedure provides detailed guidance for implementing HM-2, especially for projects involving excavation and grading of soils. The Procedure has provisions for, among other matters, preparing detailed plans for handling previously unknown areas of contaminated soil encountered and spills of hazardous materials that occur during construction, including provisions for preparing detailed health and safety and soils management plans, and for testing and segregating contaminated soils for proper disposal outside landfills. While the Procedure focuses on previously unknown contaminated materials, its provisions for handling, storing, and disposing of contaminated materials also apply to contaminated materials that LAWA already has identified, or will identify before the start of construction of an LAX Master Plan project in the area of contamination. By following HM-2 and the Procedure that implements it, the environmental effects of grading, excavating and other construction activities for the Bradley West Project that involve handling of contaminated materials would be less than significant. As a result, potential impacts associated with contamination of soil or groundwater and exposure of workers to hazardous materials in areas that may be contaminated would be less than significant. No additional mitigation is required to reduce potential impacts associated with contaminated materials encountered during construction.

Impacts related to fugitive dust emissions during construction were analyzed in Section 4.4 of the Bradley West Project Draft EIR. Compliance with South Coast Air Quality Management District's (SCAQMD) fugitive dust control requirements and the use of best available emission control devices to reduce diesel emissions would reduce construction peak daily emissions of PM10 and PM2.5 by 56 percent and 46 percent, maximum quarterly emissions by 55 percent and 37 percent, and total project emissions by 40 percent and 20 percent, respectively (see page 4-263 of the Bradley West Project Draft EIR). Even with the implementation of these measures, the SCAQMD thresholds would be exceeded for PM10 and PM2.5 daily emissions and the PM10 quarterly emissions and this impact is therefore considered significant. All technically feasible mitigation measures. Including SCAQMD Rule 403, have been incorporated into the Bradley West Project and no further measures have been recommended (see page 4-274 of the Bradley West Project Draft EIR).

Toxic air contaminants were evaluated as part of the Human Health Risk Assessment, discussed in Section 4.5 of the Bradley West Project Draft EIR. The analysis concluded that risks associated with the release of toxic air contaminants during and after the construction of the project would be less than significant after mitigation (see page 4-311 of the Bradley West Project Draft EIR).

BWP-PC00011-8

Comment: 4. There is a question as to the total increase in space and utilization. We feel that even more concessions should be made available as we expect that they would have a high rate of return for LAWA. Further, the amount of space allocated for flight waiting areas should be expanded to accommodate future growth of the larger aircraft. The A380, for instance, is designed for 350-450 passengers now, but longer, more packed versions up to 1000 people are possible similar to the changes that occurred when the 747 was first introduced.

Response: Concessions space planning for the Bradley West Project followed the standard methodology used in the industry. Under this methodology, concession planners forecast the amount they expect will be spent per enplanement, identify a target planning year productivity level (sales per square foot), and develop the space requirements per concession category based on a combination of those inputs and projected total enplaned passengers. There is no industry standard for per passenger revenue projections; rather, these projections vary by airport, by terminal, by the mix of passengers, and by the quality of the concession program provided. For the Bradley West Project, the concession planners, based on their experience, forecasted an expected level of per passenger sales based on the desired concession program and assumptions regarding the quality of the concession operators that are being targeted by LAWA for this facility. The concession planners used a productivity level that would provide sufficient space to prevent crowding from discouraging sales. Benchmarking was used to validate the assumptions based on sales within LAX and at other airports with similar passenger characteristics. TBIT currently provides 56,000 square feet of concession and retail area. With implementation of the Bradley West Project, concession/retail area would more than double to 118,950 square feet.

Please see Response to Comment BWP-PC00002-2 regarding the sizing of the proposed holdrooms to accommodate A380 and other new generation aircraft.

BWP-PC00011-9

Comment: 5. The DEIR shows that traffic in the CTA will be terrible with or without the project. New parking facility recommendations should be included in CTA area for this project.

Response: The on-airport surface transportation analysis was prepared to identify the changes in traffic conditions that would result from the implementation of the Bradley West Project. As described in Section 2.4.5 on page 2-44 of the Bradley West Project Draft EIR, the proposed TBIT improvements are specifically intended and designed to improve the level and quality of service provided to international passengers at LAX, but would not materially change the overall operational characteristics of the airport. The project is comprised of new contact gates at TBIT that would allow passengers to process off the aircraft at a faster rate than is possible when passengers are required to be bused from remotely parked aircraft to TBIT. Furthermore, an improved arrivals process would allow more efficient passenger processing through the reconfigured TBIT than is currently provided with the existing facilities. It is anticipated that the implementation of the Bradley West Project improvements would affect only the rate at which passengers access the curbside and, consequently, the peaking activity along the terminal curbsides and roadway system. The overall passenger volume accessing the airport on a daily basis would not be affected by the Bradley West Project; therefore, overall CTA public parking demand would not be affected by the project. Additional discussion of the project components, their effect on traffic peaking characteristics and public parking can be found on pages 4-5 and 4-6 in Section 4.1.1 of the Bradley West Project Draft EIR.

Furthermore, the CTA parking system is currently underutilized, a fact recognized by the commentor under Comment BWP-PC00011-28. When the most recent CTA parking occupancy analysis was completed in August 2004, LAX was operating with 60.7 million annual passengers and the CTA had an overall parking occupancy rate of 62 percent. In 2008, LAX processed 59.8 million annual passengers and with parking rates unchanged it is not believed that this parking occupancy rate has increased. Based on this activity level, it is anticipated that the CTA parking supply is sufficient to meet anticipated needs through the 2013 planning horizon analyzed for the Bradley West Project. However, LAWA will continue to actively monitor parking demand relative to

supply and will continue to employ operational measures to manage the allocation of public parking demands between facilities to the extent appropriate and necessary. The proposed project would not result in a significant impact associated with parking.

BWP-PC00011-10

Comment: 6. Where is the blast glass recommended in the 2003 Rand Study of LAX security and in security discussions with the Israelis to be installed?

Response: The Bradley West Project improvements are well removed from any vehicle curbside areas and do not warrant the installation of blast glass.

BWP-PC00011-11

Comment: 7. In Appendix B-2, 2013 is used the future horizon for the ground traffic impact studies. Why was 2013 chosen as the future horizon for traffic? The LAX Master Plan adopted in 2004 was intended to cover LAX through 2015. If the Bradley West DEIR is tiered off from the LAX Master Plan, then why does Bradley West DEIR have a traffic study that only goes through a 2013 horizon? Does CEQA allow for different planning horizons for tiered projects? Does LAWA have recent (2008 or 2009) traffic projections for 2015 that could be used for the Bradley West project?

Response: In accordance with the City of Los Angeles Department of Transportation (LADOT) Traffic Study Policies and Procedures (Revised March 2002), the traffic analysis horizon is typically considered to be the year when project buildout is completed. Buildout of the LAX Master Plan was initially anticipated to occur in 2015; hence, that was the horizon year used in the LAX Master Plan EIR traffic analysis. Completion of the improvements proposed for the Tom Bradley International Terminal (TBIT) under the Bradley West Project is anticipated to occur in 2013; hence, the Bradley West Project EIR On-Airport traffic study (Section 4.1 of the Bradley West Project Draft EIR with supporting data provided in Appendix B) used that year for the analysis. While much of the Bradley West Project Draft EIR analysis is tiered off the LAX Master Plan EIR, the traffic analysis for the Bradley West Project is not tiered off the LAX Master Plan EIR. This is due primarily to the fact that the circulation system presented in the LAX Master Plan EIR for Alternative D, which was approved as the Master Plan, assumed that roads within the Central Terminal Area at buildout of the LAX Master Plan were closed to public traffic. Such would not be the case at completion of the Bradley West Project. As such, a new "stand-alone" traffic study was completed for the Bradley West Project Draft EIR. Please see Bradley West Project Draft EIR Sections 4.1.1 and 4.1.3 for additional discussion of the On-Airport Surface Transportation analysis, and Section 4.2.2.1 for additional discussion of the Off-Airport Surface Transportation analysis conducted for the Bradley West Project.

BWP-PC00011-12

Comment: Detailed specific Issues to be addressed (bullet topic followed by questions/comments):

- Section 2.4.1.2 inconsistency:
Figures 2-1 shows ten eastern gates and 2-2 shows nine eastern gates. It is not impossible, but is difficult to reconcile with the text wording. One part describes nine new gates without noting whether or not the two NLA compatible on each end of TBIT are included.

Response: Figures 2-1 and 2-2 of the Bradley West Project Draft EIR both show ten eastern gates, with the only difference being that Figure 2-2 does not show an airplane parked at the northernmost gate. This number of gates is consistent with the text description in Chapter 2 of the Bradley West Project Draft EIR. The last paragraph on page 2-4 of the Bradley West Project Draft EIR indicates: "The twelve gates that currently exist along the east side of TBIT would be replaced by nine new gates plus existing Gate 123, which was modified in 2008 to accommodate the A380, and which would be retained." Figure 2-2 shows the location of Gate 123, being at the northern end of the north concourse. Please also see Response to Comment BWP-AL00001-3 for additional discussion regarding the number of gates being eliminated or being added as a result of the Bradley West Project.

BWP-PC00011-13

Comment: - Sterile transports to terminals three and four from TBIT are described in several places but details and scheduling is absent.

Response: The Terminal 3 secure connector corridor is proposed to be a single-level elevated connection between Level 4 of the Tom Bradley International Terminal (TBIT) core and existing Terminal 3 to the northeast. It would provide a post-security connection between the two buildings and eliminate the need to bus arriving international passengers from Terminal 3 to TBIT to remain secure.

The Terminal 4 secure connector would be a single-level connection above the existing sterile connection between the existing TBIT and existing Terminal 4. It would allow arriving international passengers at Terminal 4 to proceed to TBIT without having to exit the terminal and re-enter security at TBIT.

Both connectors would include exit stairs on either side of fire/security exits along Terminal 3 and Terminal 4, allowing for security and life-safety control of passengers.

Construction of the subject connectors would occur in conjunction with the demolition and relocation of the existing aircraft gates on the east side of the TBIT concourses, following completion of the new north and south concourses at TBIT.

BWP-PC00011-14

Comment: - The Chapter 2 description doesn't show the crossfield taxiways and how it interplays.
- Some of the following were mentioned as part of the crossfield taxiway program NOP but duplicated in the description of this project? Move taxiways S /Q west 7 RON reside over night gates 2 ground fueling stations new AARF Aircraft Rescue and Fire Fighting

Response: The comment is unclear as to which crossfield taxiways are of concern in Chapter 2 of the Bradley West Project Draft EIR. Figure 2-1 in Chapter 2 shows the location of existing and proposed taxiways associated with the proposed Bradley West Project. If the taxiway of interest is Taxiway C13 proposed as part of the Crossfield Taxiway Project (CFTP), that taxiway is not presented in Chapter 2 because it is not part of the Bradley West Project. Chapter 3.3 of the Bradley West Project Draft EIR describes other related projects, such as the CFTP. Please see Response to Comment BWP-PC00009-4 which includes a figure that shows the location of the CFTP in relation to the proposed Bradley West Project.

The CFTP EIR Notice of Preparation (NOP) contained no discussion of moving Taxiways S and Q west. The CFTP EIR NOP only discussed Taxiways S and Q as they relate to the CFTP's goal of relieving aircraft traffic congestion. Similarly, there is no mention of any ground fueling stations in the CFTP EIR NOP. The CFTP EIR NOP stated that the remain overnight (RON) aircraft parking currently located within the proposed alignment of Taxiway C13 would be resituated to a new location adjacent to Taxiway C13 as part of the CFTP. This element of the CFTP does not overlap or duplicate any element of the Bradley West Project. The CFTP EIR NOP also indicated that a new Aircraft Rescue and Fire Fighting (ARFF) facility is proposed to be constructed as part of the CFTP, to replace the existing undersized facility. Demolition of the existing ARFF is proposed to occur in conjunction with the Bradley West Project, as described in Section 2.4.2 of the Bradley West Project Draft EIR. There is no duplication in the descriptions of the subject projects in the CFTP EIR NOP and the Bradley West Project Draft EIR.

BWP-PC00011-15

Comment: - Fig 1-3 doesn't show taxiway locations or existing RON locations.

Response: Figure 1-3 of the Bradley West Project Draft EIR is a general illustration of the LAX Master Plan and is intended to provide an overview of the main components of the LAX Master Plan. While the basic locations of taxiways are evident by the light green pathways within the north and south airfield complexes and the taxiway intersections around the midfield area (i.e., where crossfield taxiways intersect with taxiways that extend parallel to the runways), the subject figure is not

intended to provide a detailed delineation of taxiways associated with the LAX Master Plan. Taxiway locations within the LAX Master Plan can be seen in greater detail in Figure F3-14 of the LAX Master Plan Final EIR.

Similarly, Figure 1-3 of the Bradley West Project Draft EIR is not intended to delineate the locations for Remain Overnight (RON) aircraft parking. Figure 1-3 provides an illustration of the future improvements proposed under the LAX Master Plan and is not intended to delineate the nature and locations of existing uses, such as existing RON locations. Please see Response to Comment BWP-PC00011-25, which notes that page 2-34 of the Bradley West Project Draft EIR provides a written description of the nature and location of existing RON aircraft parking spaces that will be impacted by implementation of the Bradley West Project, and how the displaced parking will be relocated. Response to Comment BWP-PC00011-25 also notes that the locations of the displaced/relocated RON areas are shown in Figure 2-7 of the Bradley West Project Draft EIR.

BWP-PC00011-16

Comment: - Coordination with Central Utilities Plant project is unclear.

Response: As indicated on page 3-6 of the Bradley West Project Draft EIR, construction of the Central Utility Plant (CUP) Replacement Program is anticipated to occur between May 2010 and April 2013. While that construction would be underway at the same time as construction of the Bradley West Project (see page 4-4 of the Bradley West Project Draft EIR), there would be little direct interaction between the two projects. The improvements proposed under the Bradley West Project would occur on the western side of TBIT, with construction access occurring primarily from the west. The improvements proposed under the CUP Replacement Program would occur within the Central Terminal Area east of TBIT. LAWA maintains regularly scheduled coordination meetings between the planning and development teams for the two projects, including as related to planned construction activities.

BWP-PC00011-17

Comment: - Para 2.4.1.2 states: "With implementation of the proposed project, international flights that process passengers through TBIT and that would otherwise use remote gates would instead be routed directly to and from TBIT, thereby eliminating the remote gate busing operations associated with those flights. To the extent development of the new gates along the west side of TBIT would reduce the need for, and use of, the existing remote gates for international flights, the remote gates would be more available to be used for Remain Overnight (RON) aircraft parking."

Does this mean that the remote gates are to be removed? When? Where is this addressed?

Response: Please see Response to Comment BWP-AL00001-3 regarding the continued use of existing remote gates following completion of the Bradley West Project and the reasons why such use is not in conflict with the LAX Master Plan and is consistent with the provisions of the LAX Master Plan Stipulated Settlement.

As indicated in Section 2.3 of the Bradley West Project Draft EIR, one of the project objectives is to "Reduce the need for, and use of, existing remote gates at the west end of the airport and the need to bus passengers and crews between TBIT and the remote gates." Please see Responses to Comments BWP-AL00001-4 and BWP-AL00001-5 regarding how implementation of the proposed project would reduce future reliance on, and use of, remote gates and the associated reduction in bus trips.

BWP-PC00011-18

Comment: - The DEIR states "Relocation of existing Taxiways Q and S, as described in greater detail below, would require demolition of the existing American Eagle (American Airlines) Commuter Terminal, which has 12 existing aircraft gates. In conjunction with the expiration of American Airlines' existing lease and establishment of a new lease, the existing commuter operations at that facility would relocate to the existing commuter terminal located just east of Terminal 8, which was formerly operated by United Express but is now vacant. Nominally, based on the above, implementation of

the proposed project would result in a net reduction of 5 aircraft gates, with 7 gates being added to the current total of 12 gates at TBIT and 12 gates being eliminated with the demolition of the American Eagle Commuter Terminal."

Are the American Eagle gates used? If not, are these gates counted in the total numbers available? It says that there are 12+7=19 gates at TBIT in the new design?

Response: The 12 existing gates at the American Eagle Commuter Terminal are currently used, but would be removed and eliminated as part of the Bradley West Project. Please see Response to Comment AL00001-3 regarding the total number of gates after project completion. As discussed therein, there would be seven additional gates at TBIT compared to existing conditions at TBIT and the removal of the 12 existing gates at the American Eagle Commuter Facility which is being relocated to 12 of the existing 18 gates at the United Airlines Commuter Terminal identified in Figure 2-7 of the Bradley West Project Draft EIR.

BWP-PC00011-19

Comment: - Par 2.4.1.3 states: "The existing bus gates would be replaced by a 28,400- square-foot busing operations hold room comprised of either a pre-engineered metal building or a concrete tilt-up structure to be constructed at the northern end of the existing north concourse. The subject facility would accommodate the existing busing operations between TBIT and the west remote gates and between TBIT and international flights occurring at gates within the CTA. With development of the new contact gates at TBIT and the addition of new sterile/secure connector corridors between TBIT and Terminals 3 and 4, the need for busing operations and associated passenger holdroom would be substantially reduced. The temporary busing operations holdroom would remain in operation until a new busing operation holdroom sized to reflect the reduced need for busing is constructed.

Where will a new holdroom be built? Why are the remotes apparently being kept active after TBIT is built? What size is currently existing inside TBIT and what will it become?

Response: Please see Figure 2-4b of the Bradley West Project Draft EIR, which shows the location proposed for the new busing facilities holdroom. Please see Response to Comment BWP-AL00001-4 for additional details regarding the design and use of the proposed busing facilities.

BWP-PC00011-20

Comment: - The DEIR states ". . . The existing facility, including the north and south concourses and central core, encompasses a total of approximately 977,120 square feet. The proposed future facility would provide approximately 2,024,110 square feet of floor area. Table 2-1 provides a breakdown of existing and future floor area uses within TBIT, including the central core and concourse areas, and Figures 2-4a through 2-4e present conceptual floor plans for . . ."

At the public meeting we were told that the increase is about 750,000 square feet. Which is correct?

Response: The future floor area estimates presented in Chapter 2 of the Bradley West Project Draft EIR are based on the conceptual floor plans shown in Draft EIR Figures 2-4a through 2-4e, which provide the basis for the impacts analysis completed for the project. Further evaluation of those conceptual floor plans, including more detailed design, engineering, architectural, and cost analyses, are anticipated to result in refinements to the floor plans. This is particularly true relative to improved efficiencies in space utilization that can reduce floor area requirements and associated construction costs. The total net increase in floor area at Tom Bradley International Terminal (TBIT), as reconfigured through the Bradley West Project, is estimated to be between approximately 750,000 square feet and 1,250,000 square feet. The Bradley West Project Draft EIR impacts analysis is based on the higher number, providing a conservative (worst-case) analysis.

BWP-PC00011-21

Comment: Figure 2.4a floor plan not readable.
Bradley West Core drawings are not readable.

Response: The comment is noted. To increase legibility, the following provides enlargements of the Bradley West Core areas depicted in Figures 2-4a through 2-4e of the Bradley West Project Draft EIR. In addition, a section view of the Bradley West Core, as included in Figure 2-5 of the Bradley West Project Draft EIR, with legible call-outs for certain uses added, is provided below.

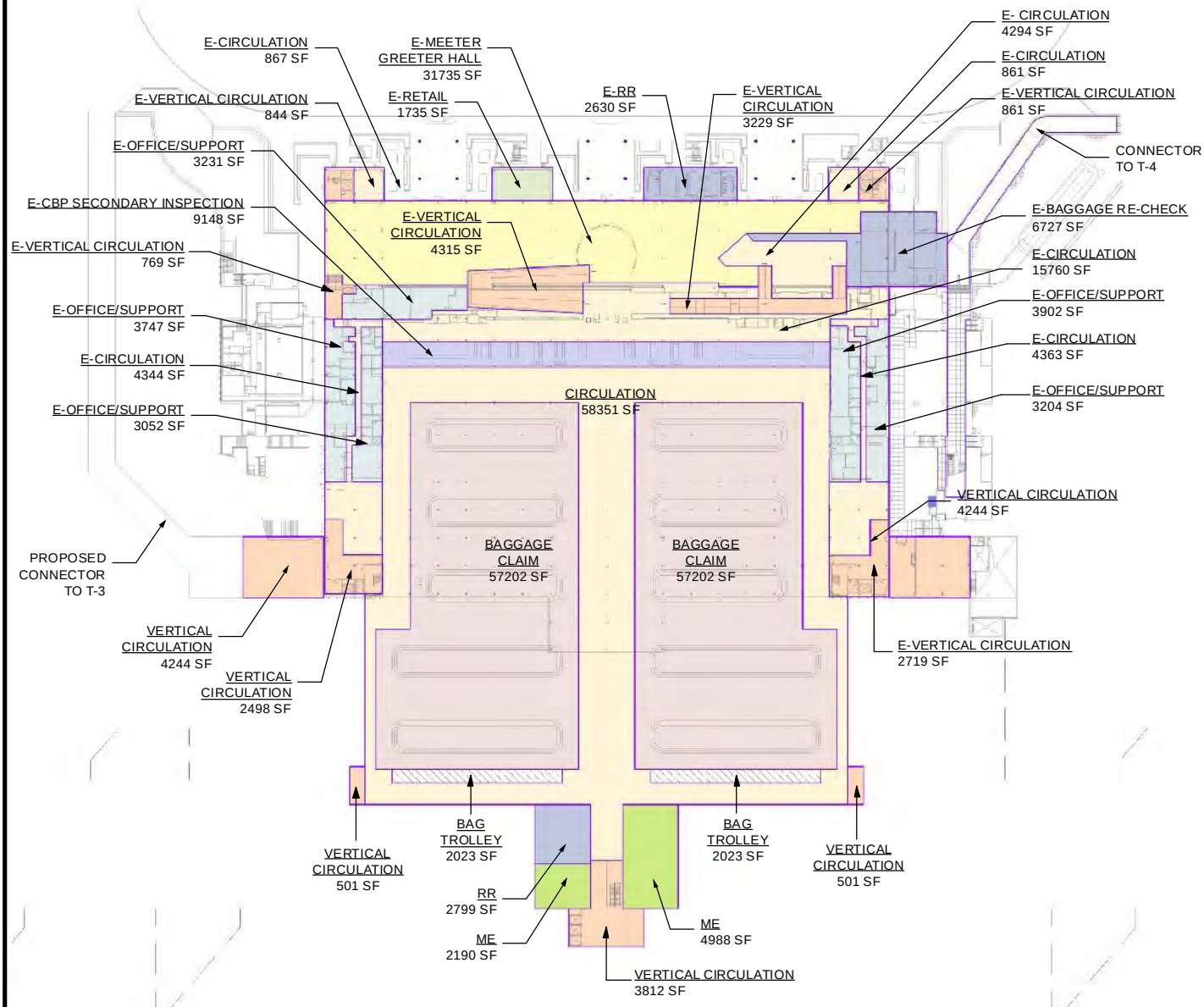
BWP-PC00011-22

Comment: - Paragraph 2.4.1.5 Taxiways S and Q Westward Relocation states: "The area along the west side of TBIT that is proposed for the new concourse facility, new gates, loading bridges, and aircraft apron area is currently occupied by Taxiways S and Q and an adjacent service road, which provide aircraft access between the north runway complex and the south runway complex. As part of the proposed project, both taxiways would be relocated approximately 518 feet to the west (from centerline of existing Taxiway Q to centerline of new Taxiway S), and would be designed and constructed to accommodate ADG VI aircraft. The relocated taxiways may be designated by the FAA as either taxiways, taxilanes, or one of each.

Does this mean that the two new crossfield taxiways may not be built per Alt D and that only the one approved for construction may proceed? What is the implementation schedule? How does the two project schedules overlap? If all are to be built to facilitate increased traffic between north and south complexes what visibility requirements have been established from the tower since this is currently a "no visibility zone."

Response: The Bradley West Project would retain two crossfield taxiways immediately west of Tom Bradley International Terminal (TBIT) after the new contact gates are constructed, which is consistent with the LAX Master Plan. Construction of both of the subject taxiways, which are identified as Taxiways "S" and "T" in the Bradley West Project Draft EIR, is proposed for approval as part of the Bradley West Project. It should be noted that Taxiways "S" and "T" proposed as part of the Bradley West Project would replace existing Taxiways "Q" and "S." The fact that one of the existing taxiways and one of the proposed taxiways are both labeled as Taxiway "S" may have made it unclear to the commentor that construction of two new (replacement) taxiways is proposed as part of the Bradley West Project. Construction of Taxiway S would occur first, commencing immediately upon approval of the Bradley West Project. Construction of Taxiway T would occur in the latter phases of the project, following completion of the new north and south concourses and gates, when the new Taxiway S is fully operational. There would be no overlap in the construction of Taxiway S and the construction of Taxiway T. (see Section 2.4.3 of Bradley West Project Draft EIR)

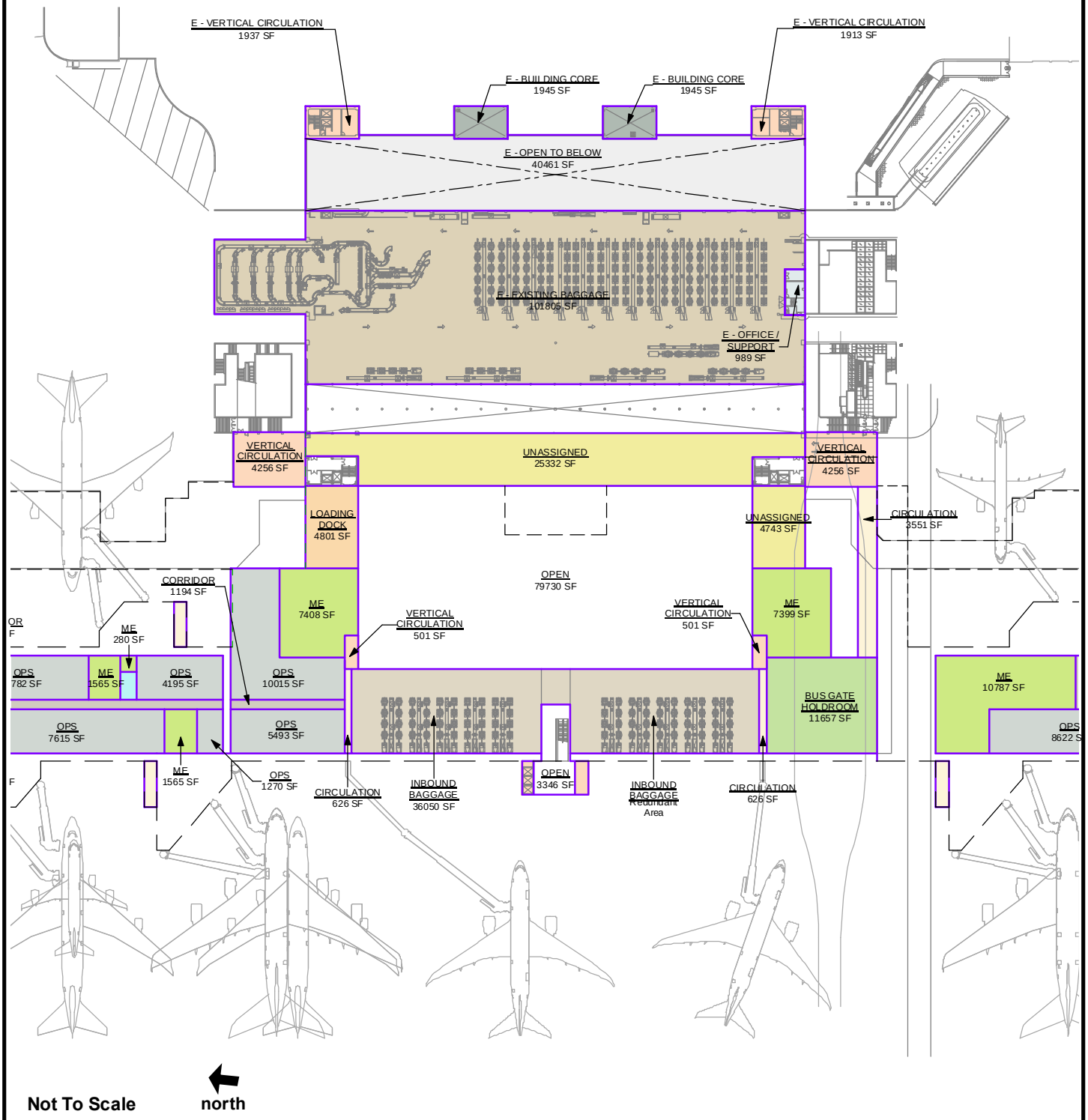
Aircraft operations on proposed Taxiways S and T would be managed by the FAA Air Traffic Control Tower (ATCT), which includes positive control of all aircraft ground movements at LAX (i.e., aircraft pilots must follow the instructions of the ATCT at all times while on the ground). Although the presence of the proposed Bradley West Core and possibly the portions of the new concourses may partially obscure views from the ATCT of parts of the taxiways, it is anticipated that the tails of most, if not all, aircraft would be visible from the ATCT. An FAA Line-of-Sight analysis would be completed prior to operations occurring on the proposed Taxiways S and T to determine the extent of any view blockage. If it is concluded that portions of the taxiways are blocked from controllers' view in the control tower, LAWA expects that the FAA would manage the flow of traffic in a similar manner for existing Taxiway S and Taxiway Q, which currently traverse through an ATCT non-visible area. The FAA provides safe movement along existing Taxiway S and Taxiway Q via published standard taxi routes and instructions. According to the standard taxi route instructions, pilots are instructed to switch over to the appropriate ground controller when at a specified checkpoint located on either Taxiway S or Q. If not cleared by the ground controller, pilots are to hold short of Taxiway D if traversing north along Taxiway Q or hold short of Taxiway B if traversing south along Taxiway S. Standard routes and use of checkpoints would most likely be utilized for proposed Taxiways S and T if traversed through a non-visible area. Additionally, it is important to note that the recent installation of the ASDE-X ground radar system provides the FAA ATCT with aircraft location information throughout the airfield, including in areas that may be blocked from view from the tower.



Not To Scale **north**

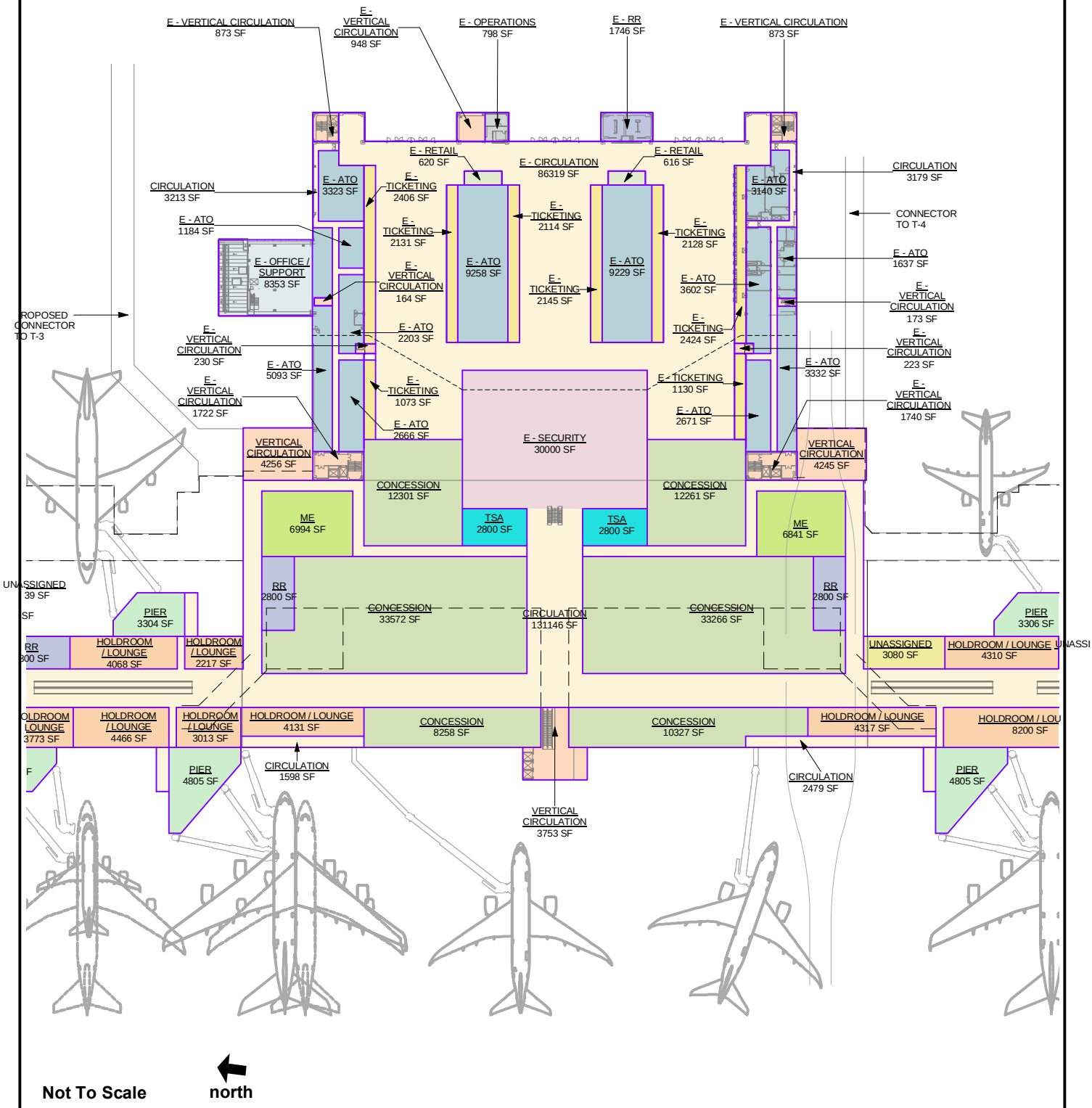
Source: LAX Development Program Team, 2008.

LAX Bradley West Project Draft EIR	**Bradley West Conceptual Floor Plan Level 1 - Core Area**	Figure **2-4a** **Partial Enlargement**



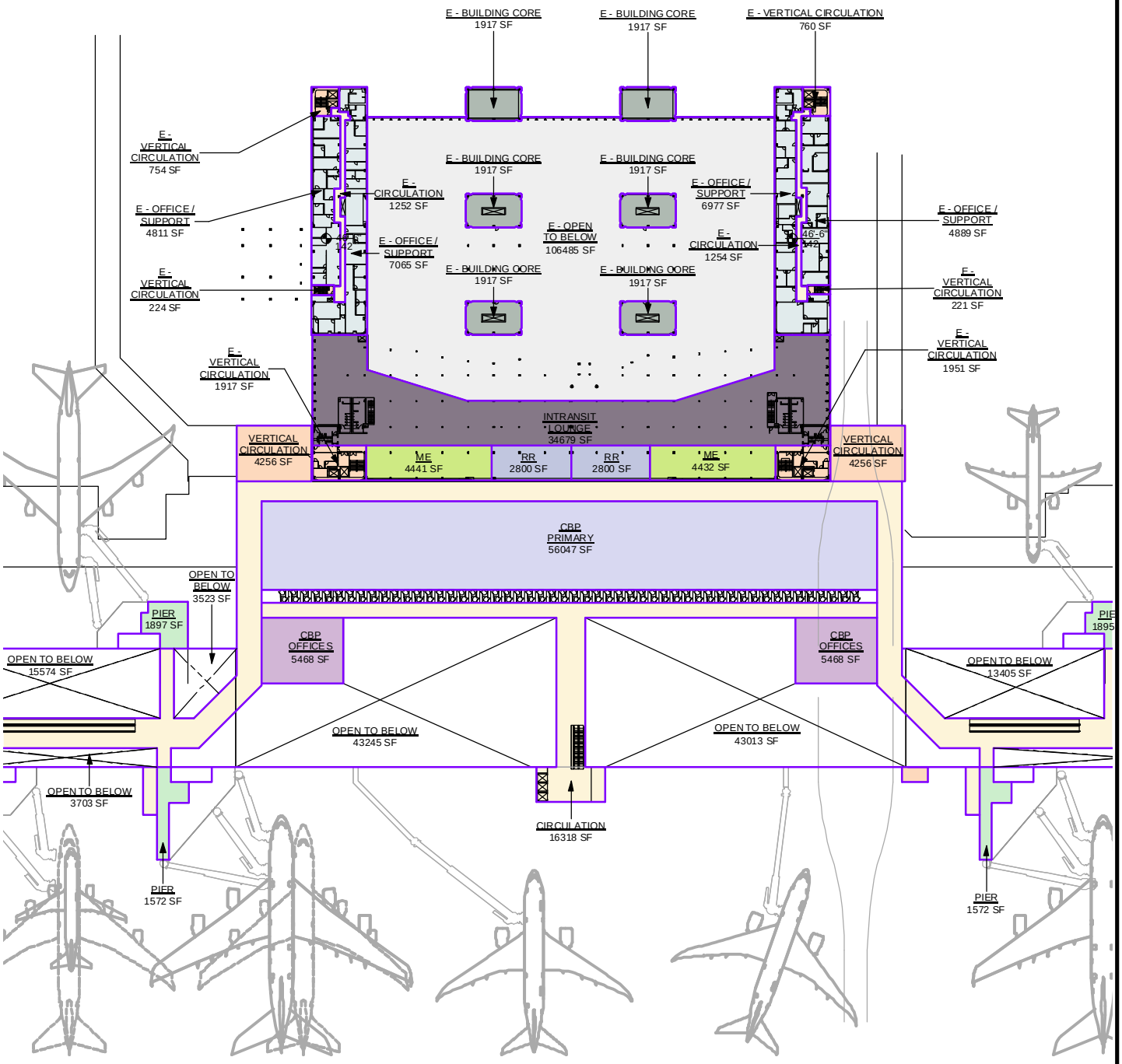
Source: LAX Development Program Team, 2008.

LAX Bradley West Project Draft EIR	**Bradley West Conceptual Floor Plan Level 2 - Core Area**	Figure **2-4b** Partial Enlargement



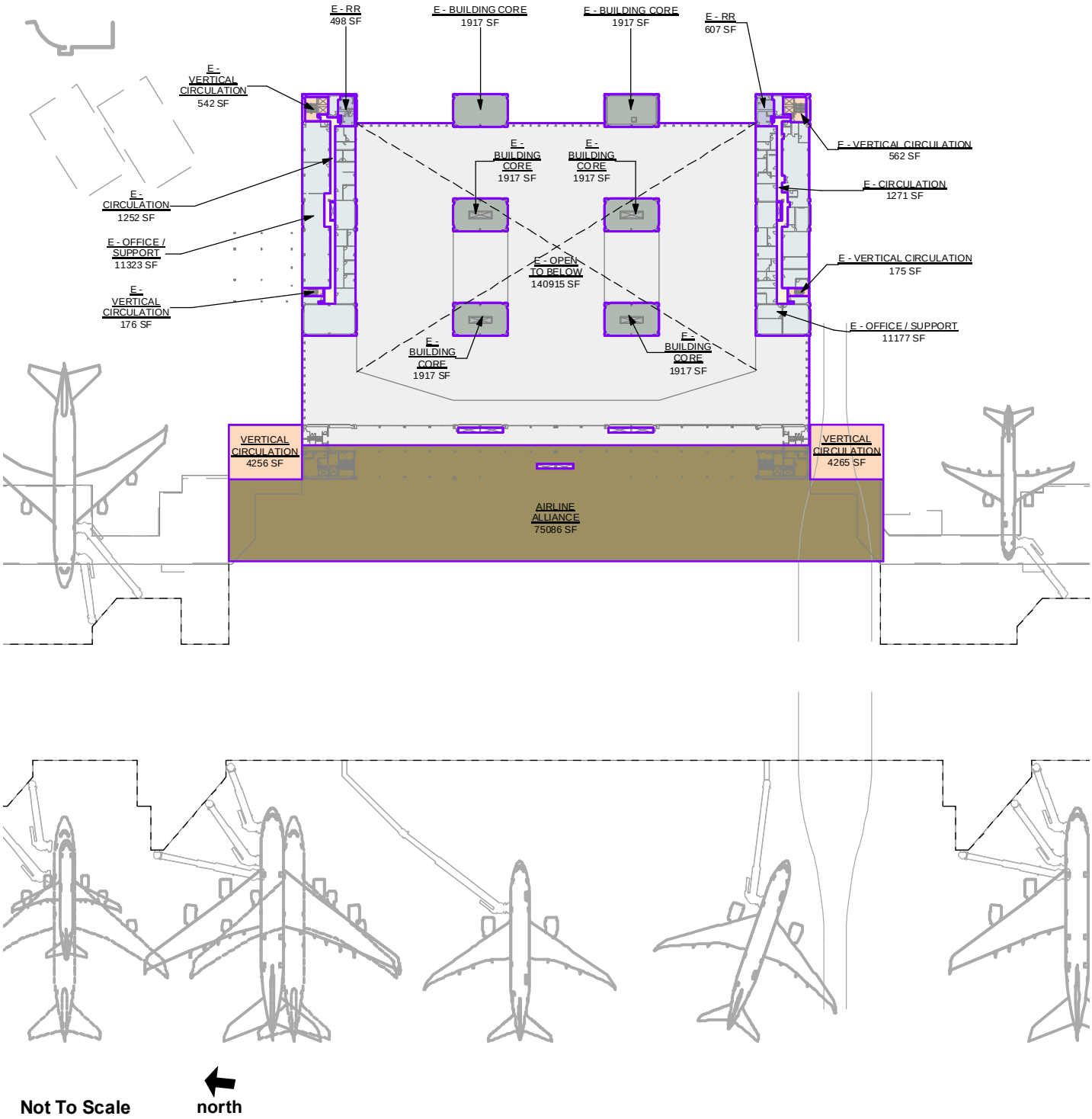
Source: LAX Development Program Team, 2008.

LAX Bradley West Project Draft EIR	**Bradley West Conceptual Floor Plan Level 3 - Core Area**	Figure **2-4c** **Partial Enlargement**



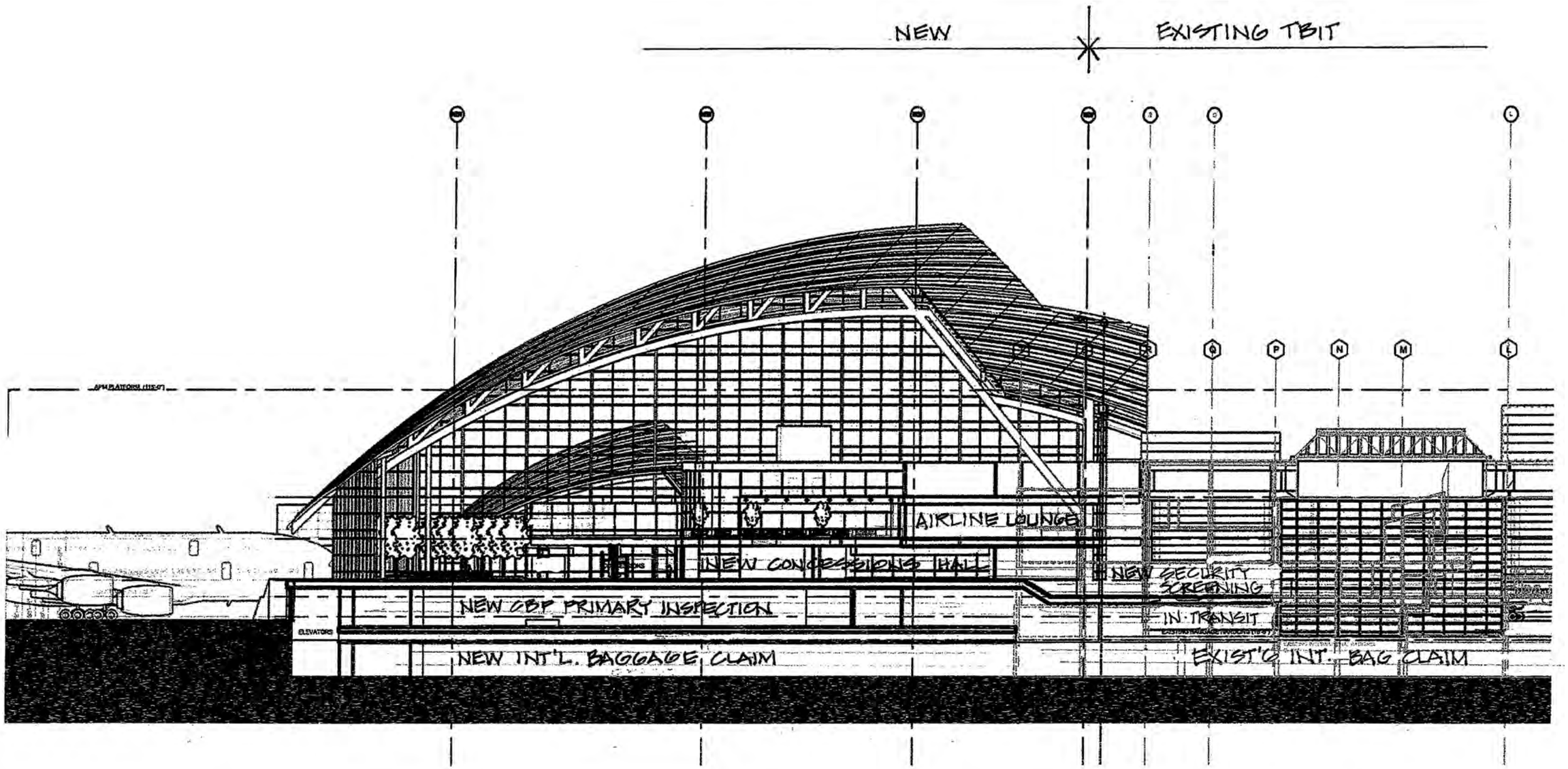
Source: LAX Development Program Team, 2008.

LAX Bradley West Project Draft EIR	**Bradley West Conceptual Floor Plan Level 4 - Core Area**	Figure **2-4d** Partial Enlargement



Source: LAX Development Program Team, 2008.

LAX Bradley West Project Draft EIR	Bradley West Conceptual Floor Plan Level 5 - Core Area	Figure 2-4e Partial Enlargement



Not to Scale

Source: AECOM, 2009.

LAX Bradley West Project Draft EIR	**Bradley West Central Core Building Section**	Figure **2-5** **Partial Enlargement**

BWP-PC00011-23

Comment: - Paragraph 2.4.1.5 continues ... the actual construction of the tunnel segments and system is anticipated to occur through a discretionary approval(s) separate from the Bradley West Project.

Does this refer to the sterile tunnels to Terminals 3 and 4 or to a future midfield concourse area? What schedule is anticipated?

Response: The subject text reference to "tunnels" pertains to the tunnels that would extend to the future Midfield Satellite Concourse, as envisioned in the LAX Master Plan and analyzed in the LAX Master Plan Final EIR. Please see Response to Comment BWP-AL00003-4 regarding the fact that the subject tunnels are no longer associated with the Bradley West Project.

BWP-PC00011-24

Comment: - Paragraph 2.4.1.6 Building Heating and Cooling System states: The Bradley West Project improvements include provisions for meeting the heating and cooling requirements of the building. A system that includes four natural gas boilers to generate hot water and seven chillers,...

What energy sources will be used for the supplemental heating and cooling system? Will there be a special pipline required for the low NOx natural gas mentioned in subsequent parts of the DEIR? How will this be integrated into the air flow systems? Will there be the ability to segregate air flow sections to avoid the total area contamination due to infectious or other contaminants?

Response: The energy sources for the supplemental heating and cooling system would include natural gas for the boilers and electricity for the chillers. No special pipeline would be required for the natural gas to the boilers. The low level of oxides of nitrogen emissions (i.e., "low NOx emissions") associated with the proposed boilers is based on the design of the boilers, which is consistent with the requirements of the South Coast Air Quality Management District.

The supplemental heating and cooling system would provide a source of hot water and chilled water to supplement that which can be provided by the existing Central Utility Plant (CUP). Hot water or chilled water is directed to a series of coils within the air handling unit to produce warm air or cool air, as desired. The air flow system is only affected by the temperature of the heating/cooling medium (i.e., hot water or chilled water) in producing either warmer air or cooler air, and is not affected by the source of the medium (i.e., whether the hot water and chilled water comes from the CUP or the supplemental system).

Regarding the question of segregating air flow sections to avoid a total area contamination due to infectious or other contaminants, the supplemental heating and cooling system only provides a source of hot water and chilled water and does not affect the air flow system within the Bradley West Project buildings.

BWP-PC00011-25

Comment: - Paragraph 2.4.2 Removal/Relocation of Existing Facilities states: "Construction of the relocated taxiways would require the relocation and/or removal of several existing airfield facilities including, in addition to the busing facility and utilities described above, the existing loading dock at TBIT, seven RON aircraft parking spots, ground service equipment (GSE) storage and maintenance facilities, a ground vehicle fueling station, an airfield operations area (AOA) access control post, all or a part of the aircraft maintenance hangar formerly owned and operated by TWA, the American Airlines Low-Bay Hangar..."

What is the size of the RON spaces and how many will be put in place? What aircraft will these accommodate and what is the schedule for this? What alternative aircraft parking is anticipated for this? Why not put the RON where the current remote gates are? The aircraft types discussed for use at the RON did not mention A380 or other NLA?! Would this impact the free flow of aircraft between the north and south?

Response: As described in the first paragraph on page 2-34 and shown in Figure 2-7of the Bradley West Project Draft EIR, the construction of Taxiway S would displace seven Remain Over Night (RON) aircraft parking positions located on an American Airlines leasehold (former TWA hangar). The positions are located along the northeast corner of the leasehold and would be within the object free area of the future taxiway. The number of displaced RON positions involves three Boeing 757 (B757) and four B737-800/McDonnell Douglas-80 (MD-80) parking positions, with all positions functioning independently. In an alternative parking configuration, a B767-300ER can be accommodated in lieu of one B757 with the adjacent parking position (for a B757) operating as a dependent position. Typically only some, not all, of the RON positions are occupied each night.

During construction of Taxiway S, the displaced RON positions can be temporarily accommodated on the east side of the former TWA hangar and on the east side of the American Airlines Low Bay hangar. It is possible to park three aircraft (MD-80) along the east side of the former TWA hangar, and also three aircraft (one B767 and two B757) along the east side of the Low Bay hangar. Parking of aircraft next to the Low Bay hangar must allow for access by flight catering vehicles into the existing LSG Sky Chef facility at the north end of the Low Bay hangar and this is possible.

The demolition of the American Airlines Low Bay hangar would be required for construction of Taxiway T. During the demolition of the Low Bay hangar, aircraft would still be able to RON as described above. After the demolition of the Low Bay hangar and during construction of Taxiway T, it would be possible to park RON aircraft on the site formerly occupied by the Low Bay hangar.

Also, it is anticipated that additional RON aircraft parking opportunities would be available at existing remote gates when not in use for aircraft arrivals and departures. This potential for RON use of the remote gates is indicated on page 2-11 of the Bradley West Project Draft EIR.

With regard to RON aircraft parking for the Airbus A380 and other New Large Aircraft (NLA), such parking would be provided in the new RON area being developed as part of the Crossfield Taxiway Project (CFTP). The CFTP is described on page 3-3 of the Bradley West Project Draft EIR and addressed as a related LAX Master Plan development project. The subject RON area includes five aircraft parking spaces, three of which would be sized for Airplane Design Group (ADG) VI aircraft such as the A380. Such aircraft parking spaces would place ADG VI aircraft outside nearby taxiway areas and would not impact the free flow of aircraft between north and south.

BWP-PC00011-26

Comment: - Figure 2-7 The vehicle parking is moved from behind TBIT to east of Sepulveda and along Imperial. Is this staging/construction parking or employee parking? How will the users of their new locations arrive at their work areas? If this is permanent, how much along runway/taxiway traffic will be created?

Response: As described in Table 2-3 of the Bradley West Project Draft EIR, the subject parking is for employees and visitors of uses nearby such as ground service equipment (GSE) maintenance and flight kitchens. Also, employees and visitors of nearby aircraft maintenance use the parking area. Many of these uses are proposed to be relocated in conjunction with implementation of the LAX Crossfield Taxiway Project and the Bradley West Project. The parking for such uses is proposed to be provided at or near their new locations. In the case of GSE maintenance and aircraft maintenance operations that are to be relocated to the eastern portion of the airport, the existing parking for those uses would be relocated accordingly. It is not anticipated that there would be any notable need to transport workers across airfield areas to and from the relocated parking areas.

BWP-PC00011-27

Comment: - Page 2-39 Contains a verbal description of construction phasing including the western portion of Bradley West by mid-2013. How will this west side construction and then east side construction meet the promised needs to accommodate NLA?

Response: The construction phasing program presented in the Bradley West Project Draft EIR is based on a comprehensive detailed construction schedule developed by the LAX Development Program team, which includes several highly-qualified firms and individuals having substantial experience with

airport development projects. Pending completion of the CEQA review and public hearing processes, and providing that all necessary project approvals are received, LAWA is prepared to commit substantial resources in completing the project in a timely manner.

The construction sequence for the main components of the project provides, first, for the construction of new (replacement) Taxiway S, designed to accommodate Airplane Design Group (ADG) VI aircraft (i.e., New Large Aircraft - "NLA"), followed closely by construction of the new north concourse, the Bradley West Core, and the new south concourse. Completion of those concourses would include the construction of new contact gates along the west side. It is anticipated that completion of Taxiway S and the north concourse would occur by early 2012, providing two new gates designed to accommodate ADG VI aircraft. Completion of the south concourse and new contact gates along its west side would occur later that year and provide an additional 5 contact gates designed for ADG VI aircraft. Following construction of the new concourses, demolition of the existing concourses would occur and the existing contact gates on the east side of TBIT would be relocated to the east side of the new concourses. (Please see Bradley West Project Draft EIR, Section 2.4.3.)

BWP-PC00011-28

Comment: - Paragraph 2.4.4.1 Contractor Staging identifies a large area for contractor parking. See the notes from the NOP and subsequent discussions with LAWA. Contractor parking in this area is unacceptable and the alternative sites should be utilized. We encourage LAWA to consider parking on the top of the CTA parking lots which we are told are underutilized at this time. If the lot on the south east is used, we encourage an entrance off Imperial beyond Main Street which would allow traffic to be inside of the fence and reduce impacts on the surrounding community.

Response: Section 2.4.4 of the Bradley West Project Draft EIR describes several areas proposed for use as construction staging/laydown and/or contractor employee parking areas. The potential environmental impacts associated with the construction and operation of these areas are addressed throughout Chapters 4 and 5. Additionally, Chapter 6 includes and addresses an alternative, called Alternative 4, which was developed largely in response to comments received on the EIR Notice of Preparation. Alternative 4 focuses the contractor employee parking primarily in the West Construction Staging Area. Please see Topical Response TR-BWP-ST-1 regarding the refinement and additional evaluation of Alternative 4: Construction Staging/Parking Areas-Optimize Use of West Construction Staging Area to Include Worker Parking. This alternative was designed in response to comments received on the NOP and Draft EIR for the Bradley West Project and provides an alternative to the proposed use of the Northwest Construction Staging/Parking Area, the East Contractor Employee Parking Area, or the Southeast Construction Staging/Parking Area as the primary parking area for project construction workers. The EIR analysis of these areas, including comments received on the Bradley West Project Draft EIR, provides decision-makers with information to consider in taking action on the project.

Using the Central Terminal Area (CTA) parking structures for contractor employee parking would pose substantial logistical and operational concerns. In particular, such an arrangement would be problematic because it would require the routing of numerous workers through Tom Bradley International Terminal (TBIT) and/or airfield checkpoints in order to get them to and from work areas, which are primarily located on airfield areas west of TBIT. Under the commentor's proposal, the routing of workers from parking within the CTA to airside work areas west of TBIT would require that each and every worker go through security inspection checkpoints every day. Under the currently proposed construction approach, several of the airfield work areas would be fenced and secured to convert them from being "airside" to being "landside," which substantially reduces the security processing time and requirements for workers. Under the current approach, these landside areas could be accessed from World Way West. If access to these work areas is provided from the east, such as from the CTA, workers would need to go through airfield/airside security inspections and clearances every day and have to be shuttled across the airfield to and from work areas. This process would create a burden disproportionate to any benefits use of the CTA parking structures might have. Additionally, there is no evidence that use of the CTA parking structures would reduce any significant environmental impacts of the proposed project. Therefore, LAWA is not required to analyze use of the CTA parking structures as a mitigation measure or alternative. (See CEQA Guidelines Sections 15126.4 (a), 15126.6 (a).)

The Bradley West Project Draft EIR analyzed the potential impacts to nearby areas associated with the use of the Southeast Construction Staging/Parking Area in Section 4.3. As indicated in Table 4.3-12 of the Bradley West Project Draft EIR, the use of this construction staging/parking area would result in a significant unmitigable traffic impact at the intersection of La Cienega Boulevard/Century Boulevard. Given that this intersection is located north of the subject staging/parking area, the use of an entrance off of Imperial Highway, which is south of the site and extends east and west, would do nothing to avoid or substantially reduce the significant traffic impact. Also, such access would take vehicles into the airfield area, which would require that each vehicle undergo security inspections and clearances at a gate checkpoint on each and every trip. Depending on the entrance location, the security processing time for clearing vehicles during busy periods could result in extensive queuing of vehicles that may extend back onto the street.

BWP-PC00011-29

Comment: - Paragraph 2.4.5 Airport Operational Characteristics Before and After Completion of Construction states: "The subject improvements would not increase or otherwise affect the overall operational capacity of the airport. The Bradley West Project would not alter airspace traffic, runway operational characteristics, or the practical capacity of the airport. The LAX Master Plan evaluated the overall capacity constraints of LAX as a whole. The primary constraint on the airport's practical capacity at present is the limited curbside capacity of the CTA at peak hour, which causes the practical capacity15 to be approximately 78.7 million annual passengers (MAP).16 With the LAX Master Plan improvements, the airport's practical capacity in 2015 will be approximately the same, 78.9 MAP, based primarily on the constraints created by reducing the number of aircraft gates at the airport.17 The Bradley West Project would not change the existing curbside capacity of the CTA, nor would it exceed the aircraft gate limitations identified in the LAX Master Plan and reiterated in the Stipulated Settlement. It is anticipated that the overall level of international travel activity at LAX will increase between late 2008, when the Draft EIR Notice of Preparation was published and the time the proposed Bradley West Project improvements would be completed (2013),18 but would do so based on overall increases ... " and also, "18 Based on the currently proposed construction schedule, it is anticipated that all of the Bradley West Project improvements would be completed by sometime in 2013, with the exception of completion of Taxiway T (i.e., relocation of existing Taxiway S), which would be completed by 2015. Under existing conditions (2008), there are two crossfield taxiways adjacent to TBIT; Taxiways Q and S. By 2013, there would still be two crossfield taxiways; Taxiway S (relocated Taxiway Q) and Taxiway C13 (new taxiway approved in early 2009). As such, any notable change in the operational characteristics of TBIT upon completion of the Bradley West Project, compared to existing conditions, would occur by 2013. 19 Ricondo & Associates, LAX Planning Forecast Documentation, March 2009."

We question the statement of no increased capacity based on earlier DEIR statements. Since there will be a net increase of gates, better handling of passengers, and traffic flow, how is this not an increase in capacity? We do, accept that it may not be immediately utilized due to economic conditions. While the usage during the period of 2013 may not appreciably increase it could when the economy recovers.

Response: The commentor is incorrect in stating that there would be a net increase in gates. As indicated on page 2-11 of the Bradley West Project Draft EIR, implementation of the proposed project would result in a net decrease of five gates.

LAWA disagrees with the commentor's inference that an improved quality of passenger service equates to an increase in capacity, and the commentor offers no supporting information or analysis to support that claim. As described in Chapters 1 through 3 of the LAX Master Plan Final EIR, the approved LAX Master Plan (i.e., Alternative D in the Master Plan EIR, which was selected for approval as the Master Plan) was specifically designed to limit future activity levels at LAX to a design capacity of 78.9 million annual passengers (MAP), which is comparable to the activity level projected to occur if there were no Master Plan improvements (i.e., the No Project Alternative). The LAX Specific Plan requires LAWA to monitor passenger activity levels on an annual basis and the LAX Plan Compliance Review requires that the most recent annual activity level report be included in the Executive Director's review of each Master Plan project. Any increases in passenger activity levels, irrespective of the reason(s) why, will be apparent through the existing provisions of the LAX Specific Plan. In addition, the LAX Master Plan Stipulated Settlement recognizes the Master Plan's

practical design capacity of 78.9 MAP and sets forth gate reduction requirements that relate to future passenger activity levels at LAX. Specifically, Subsection IV.C. of the Stipulated Settlement identifies 75 MAP as a threshold for determining whether the passenger gate reduction requirements in Subsection IV.B. apply.

BWP-PC00011-30

Comment: - Paragraph 2.6.3 Local Actions states: A number of actions to be taken by departments of the City of Los Angeles were identified in the LAX Master Plan Final EIR relating to the certification of that document, as well as approval of the LAX Master Plan, LAX Specific Plan, and the LAX Plan.

Detailed actions required for LAX Specific Plan approval such as the Executive Director Certifications was not mentioned. Is it assumed that all requirements of the Specific Plan will be separately identified and tracked?

Response: LAX Plan Compliance Review, in accordance with Section 7 of the LAX Specific Plan, is a required action and approval for the project. Subsection D within Section 7 of the LAX Specific Plan sets forth the required findings for a compliance determination, which include consistency with the LAX Plan, all relevant provisions of the LAX Specific Plan and environmental compliance. Subsection F delineates the procedures required as part of LAX Plan Compliance Review, including the Executive Director's Review. This process, including making the required findings, ensures that the requirements of the Specific Plan will be met.

BWP-PC00011-31

Comment: - Section 3.1 Land Use Setting states: As indicated in Chapters 1 and 2, and depicted in Figure 1-2, the Bradley West Project site is located near the center of LAX, near the midfield portion of the airport. The subject area is, and has long been, actively used for airport operations and is completely occupied and surrounded by airport facilities. Onsite land uses include the existing TBIT and adjacent taxiways to the west, a commuter terminal, aircraft parking areas, aircraft hangars, maintenance facilities, and various airport/airfield operations buildings. Surrounding land uses include the following:
- The north runway complex to the north;
- The Central Terminal Area (CTA) to the east;
- The south runway complex to the south; and
- A variety of airport/airfield buildings and facilities to the west.
The closest land uses in the project vicinity that are not airport-related include the following:
- The community of Westchester north of LAX (over 0.45 mile between the northern end of the Bradley West Project site and the nearest point in Westchester);
- A mix of commercial, hotel, office, and residential uses east of LAX (over 0.75 mile between the eastern edge of the Bradley West Project site and the nearest hotel on Century Boulevard and over 1.75 miles to the western edge of Inglewood);
- Residential, commercial, office, and institutional uses to the south (approximately 0.75 mile between the southern end of the Bradley West Project site and the northern edge of El Segundo); and
- Dockweiler State Beach and Santa Monica Bay to the west (over 1.75 miles between the western edge of the Bradley West Project site and Vista Del Mar). Compatibility and consistency with applicable federal, state, and local regulations, plans and policies from operation of the airport after completion of the Bradley West Project was addressed as part of the LAX Master Plan Final EIR (see Chapter 4 of LAX Master Plan Final EIR, particularly Section 4.2, Land Use).

What are the distance from the edges of the project to the land uses with the 75 CNEL band and 65 CNEL bands? Is Dockweiler State Beach and Santa Monica Bay within these noise levels?

Response: The figure below shows the location of the Bradley West Project and surrounding land uses on a recent LAX quarterly noise monitoring report (i.e., 4th Quarter 2007, which is the most recent report on www.lawa.org). As indicated on page 4-367 of the Bradley West Project Draft EIR, the ambient noise levels indicated in the LAX noise contour map for 4th Quarter 2007 are considered to be generally representative of current noise levels, given that locations of the contours relative to nearby communities have not changed substantially over the past five years. This can be seen in comparing the 4th Quarter contours for each of the last five years, which can be accessed at http://www.lawa.org/welcome_lax.aspx?id=1090.

The figure below depicts the 65, 70, and 75 db CNEL noise contours associated with aircraft operations at LAX. Please refer to the scale in the lower right corner of the figure to determine approximate distances. As shown, portions of Dockweiler State Beach and the Santa Monica Bay (the area depicted in blue west of Dockweiler State Beach) are located within the 65, 70, and 75 db CNEL noise contours. The Bradley West Project would not notably change these noise contours. For additional discussion of aircraft noise, please see Response to Comment BWP-PC00009-21 and Section 4.8.3 of the Bradley West Project Draft EIR.

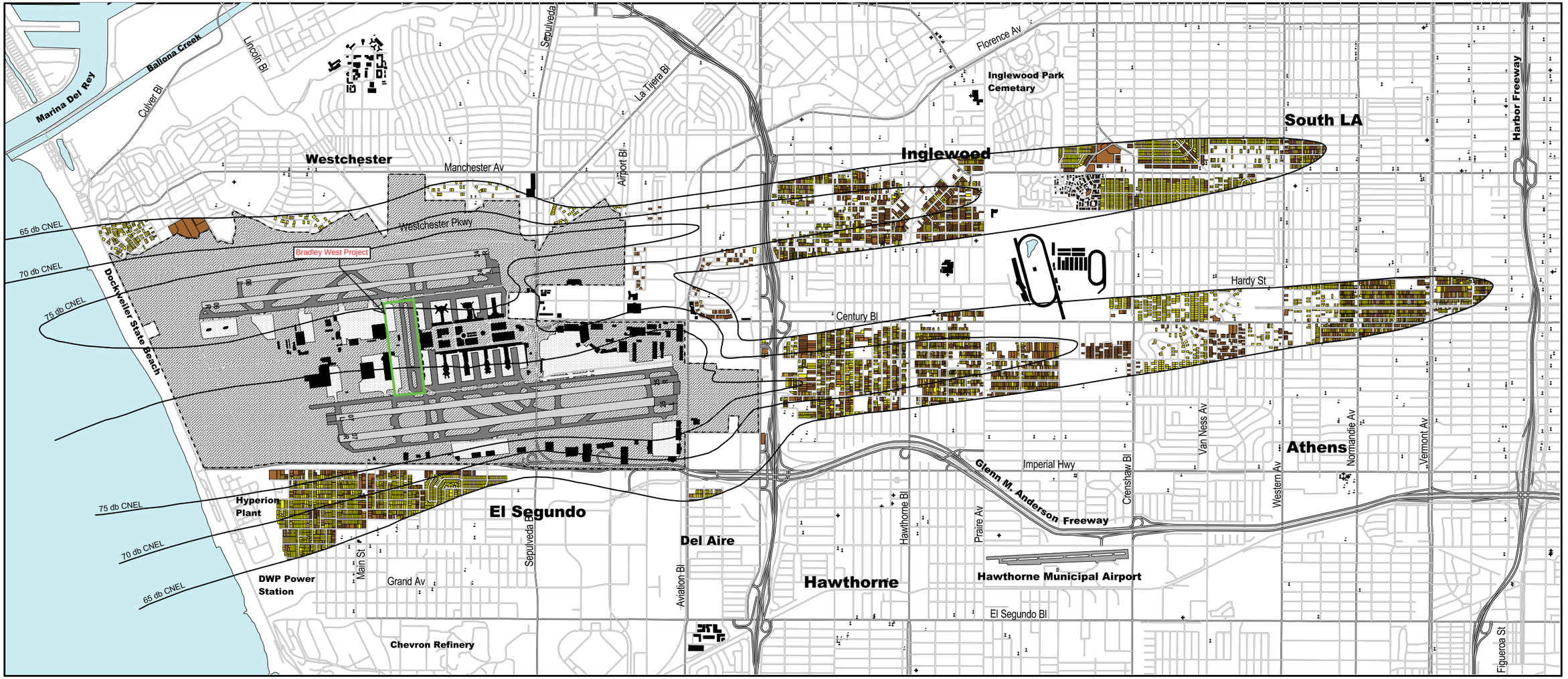
BWP-PC00011-32

Comment: - Secion 3.3 Development Setting contains the words: "- Air Quality - Similar to the noise setting, the existing air quality setting immediate to the project site is dominated by the aircraft activities described above. Other sources of existing air pollutants near the project site include ground support equipment (GSE) operations and maintenance, and vehicle traffic on and off the airfield; however, those pollutant sources are relatively minor compared to the aircraft emissions. There are no sensitive receptors at or near the project site; the closest receptors are located in the communities described in the Land Use Setting above and in Section 5.1.2 of this EIR."

The above wording is well done since the major source of pollution would be the aircraft. LAWA has been conducting an air contamination contribution study, but no results are publically available at this time. When will the study results become available? In view of recent CARB activities looking into the emissions, when will some types of controls be established?

Response: LAWA has committed to conduct a study to quantify air pollutant impacts on neighborhoods surrounding LAX and to attempt to quantify LAX's contribution to those impacts by conducting the LAX Air Quality and Source Apportionment Study (AQSAS). The first major data collection milestone in that study was the Technology and Methodology Feasibility Demonstration Project (Demonstration Project). The short-term Demonstration Project commenced in 2008 to test methods and protocols to validate the scientific viability of the AQSAS. The initial scientific analysis of the data collected during the Demonstration Project was completed at the end of 2008 and an overall summary report and detailed scientific reports for each key work task of the Demonstration Project are currently being prepared in conjunction with the AQSAS Technical Working Group. The Technical Working Group provides oversight of the technical quality of the AQSAS and is comprised of air quality scientists, researchers and engineers from the U.S. Environmental Protection Agency (U.S. EPA), California Air Resources Board (CARB), South Coast Air Quality Management District, State of California Office of Environmental Health Hazard Assessment, Federal Aviation Administration (FAA), University of Southern California, Desert Research Institute, and community organizations. The Technical Working Group recently recommended that additional evaluation of the Demonstration Project data is needed to finalize the reports and to update the technical work plan for the anticipated Long-Term project (~12-month study). In response, additional analysis will be conducted as requested by the Technical Working Group. Final results from all Demonstration Project analyses are expected to be available in 2010. Please see www.lawa.org/welcome_LAX.aspx?id=1060 for additional information regarding the AQSAS.

With regard to aircraft emissions, CARB does not set aircraft emission standards. Those can only be set by U.S. EPA and are enforced by FAA. With regard to other airport sources, such as ground support equipment (GSE), LAWA is continuing to develop clean fuel requirements for GSE used at LAX, with an emphasis on promoting replacement of conventional diesel- and gasoline-fueled equipment with electric-powered or alternative-fueled equipment. Since these types of equipment are not owned by LAWA, negotiations continue with tenants (airlines and fixed-base operators) regarding the timing of these replacements. In addition, CARB's in-use off-road heavy duty diesel-fueled equipment rule, which became fully effective in June 2008, will require that existing GSE and construction equipment fleets meet the NOx and PM emission requirements under that rule. The rule has specific phase-in periods, and operators have the option of meeting fleet average emissions or replacing a defined portion of their fleet with alternative-fueled equipment or installing emission control devices.



INCOMPATIBLE LAND USE

LOS ANGELES INTERNATIONAL AIRPORT
Incompatible Land Use by Jurisdiction
CNEL 65 , 70 , and 75 Accumulated by Noise Zones
Total Cumulative Noise Impact Areas - All Jurisdiction

	CNEL 65 and above				CNEL 70 and above				CNEL 75 and above			
Landuse	ACRES	DU	PCLS	POP	ACRES	DU	PCLS	POP	ACRES	DU	PCLS	POP
S Family	727.0	5145	5106	15891	174.7	1221	1196	4264	11.3	66	66	168
M Family	566.4	13093	3119	41092	175.6	4014	843	13753	14.2	461	48	1053
Mbl Home	0.4	1	1	3	0.0	0	0	0	0.0	0	0	0
Schools	0.0	0	0	0	0.0	0	0	0	0.0	0	0	0
Churches	0.0	0	0	0	0.0	0	0	0	0.0	0	0	0
Hospital	0.0	0	0	0	0.0	0	0	0	0.0	0	0	0
TL Incom	1293.8	18239	8226	56986	350.3	5235	2039	18016	25.5	527	114	1222

NOTES

Noise Contours are generated using RealContours which supports the Federal Aviation Administration's Integrated Noise Model (INM) version 6.2. The modeled contour is based on annualized operational information gathered for the 12 month period ending December 31, 2007. The RealContours program is run yearly or quarterly and the resultant contour is adjusted to the current quarter's Noise Monitoring Station (NMS) annual average aircraft CNEL.

Sources of information include: Runway Utilization Reports, Airline Quarterly Reports(AQR), FAA's Automated Radar Terminal System (ARTS) Data, FAA Tower Traffic Records, and the Offical Airline Guide (OAG).

Dwelling unit calculations are based on estimates made using June 1987 assessor information, supplemented with land use surveys. Population estimates reflect the increases from the 1990 census data for persons per dwelling unit. The landuse database used to generate this report reflects all progress made through LAWA's Land Use Mitigation Program through December 31, 2005.

Map projection is in State Plane Feet based on North American Datum of 1983 (NAD83), and is located in Zone 5 of the California Coordinate System of 1983.

Estimated percentage of Stage 3 Aircraft: 100%

Beginning on June 23, 2007 Runway 25R was subject to temporary closures on weekends due to Center Taxiway construction. Noise levels for 4Q07 continue to reflect the resultant changes at all noise monitor locations. Closures ended in April 2008.

LEGEND

- Residential - Single Family within Contour
- Residential - Multi-Family within Contour
- Airport Property
- Landmarks
- Churches
- Hospitals
- Schools
- Noise Contours
- Airport Boundary
- Freeways
- Streets

LAX
Los Angeles World Airports

4Q07

Airport Impact Area: CNEL 65, 70, and 75 dB Contours

0.5 0 0.5 1 Miles

N W E S

LAWA Noise Management
Environmental Affairs Officer: Scott Tatro
Checked by: Kathryn Pantoja, Environmental Supervisor II
Prepared by: Tamiko K. Higashiyama, Environmental Specialist I
Prepared On: January 08, 2009

BWP-PC00011-33

Comment: - Paragraph 3.3.1 LAX Master Plan Development Projects contains the words: "- LAX Crossfield Taxiway Project (CFTP): This project includes development of a new taxiway, Taxiway C13, extending north-south between the north airfield complex and the south airfield complex, and the extension of existing Taxiway D. Also included as part of the CFTP are the construction of a new fire station/Aircraft Rescue and Firefighting Facility (ARFF), relocation of an existing aircraft Remain Overnight (RON) area, and development of a new vehicle parking lot to replace an existing lot displaced by development of Taxiway C13 and new RON area. An EIR was completed for the CFTP and the project was approved in early 2009. Construction of the CFTP is anticipated to occur between spring 2009 and summer 2010."

Given that the LAX Master Plan Alternative D calls for two crossfield taxiways, C13 and C14, please provide information as to how operations and other potential impacts will be affected by the future incorporation of these taxiways. Are there other taxiway changes contemplated in the vicinity that can impact operations around the TBIT? They should be shown in the drawings of the project.

Response: Development of Taxiway C13 is part of the Crossfield Taxiway Project (CFTP), which is separate from the Bradley West Project. Completion of Taxiway C13, which is currently under construction, will help alleviate existing congestion in aircraft ground movements that periodically occurs in the midfield area. The commentor is correct that Taxiway C13 is one of two new crossfield taxiways identified in the LAX Master Plan, the other being the future Taxiway C12, as further described below.

In addition to new crossfield taxiways C12 and C13, the LAX Master Plan contemplated the westerly relocation of two existing crossfield taxiways; those being existing Taxiways Q and S. With the addition of new contact gates along the west side of TBIT, as envisioned in the LAX Master Plan, existing Taxiways Q and S would be relocated westward as proposed Taxiways S and T. Those LAX Master Plan improvements are the main components of the Bradley West Project.

Implementation of the CFTP and the Bradley West Project would, therefore, provide three of the four crossfield taxiways identified in the LAX Master Plan for the midfield area. The last remaining crossfield taxiway, Taxiway C12, is proposed to be included in the design and implementation of the Midfield Satellite Concourse Project, as described in the related projects discussion in Section 3.3.1 of the Bradley West Project Draft EIR.

The LAX Master Plan EIR evaluated the contributions of the LAX Master Plan to cumulative impacts for each environmental discipline to determine if they would be significant, including the operational impacts of the two crossfield taxiways. Since the Bradley West Project is consistent with the entitlements approved for the LAX Master Plan, the cumulative effect of the Bradley West Project was adequately addressed in the LAX Master Plan Final EIR. The Bradley West Project Draft EIR does, however, provide an analysis of the cumulative construction impacts of the project for some environmental resource areas. See pages 4-3 through 4-4 in Chapter 4 of the Bradley West Project Draft EIR for more information on how the cumulative impact analysis was handled.

BWP-PC00011-34

Comment: - Paragraph 3.3.1 LAX Master Plan Development Projects contains the words:
- Consolidated Rental Car (RAC) Facility: This project would provide for the consolidation and centralization of rental car operations at LAX, as contemplated in the approved LAX Master Plan. LAWA has selected a consultant team to help develop the detailed planning, engineering, and design information necessary to implement this project. It is anticipated that a focused EIR tiered from the LAX Master Plan EIR will be completed for this project; however, specific project details have not yet been determined. Construction of this project is not anticipated to begin until after completion of the Bradley West Project.

Since the TBIT West Project is not to be completed until 2015 how will traffic in the CTA be impacted when the economy returns to "normal" and traffic increases? How will the onslaught of rental car buses be modified to facilitate auto travel in the CTA?

Response: The traffic analysis completed for the Bradley West Project assumed future conditions without the Consolidated Rental Car Facility (ConRAC) as this project is not anticipated to begin until after completion of the Bradley West Project. (See Section 3.3.1 of the Draft EIR.) As indicated in Section 4.2.4.1 of the Bradley West Project Draft EIR and further explained in Section 2.4.5, the future passenger activity level at LAX projected for the 2013 horizon year used in the impacts analysis is 67.6 million annual passengers (MAP). This future activity level is based on growth projections developed in 2008 prior to the intensification of the existing worldwide economic recession. Passenger activity levels at LAX in 2008 experienced a substantial decline from previous years, ending up with a MAP level of 59.8 compared to the 2007 MAP level of 62.4. Passenger activity levels for LAX in 2009 are projected to be even lower, and any sort of recovery in 2010 is speculative at this time. As such, the traffic activity levels assumed in the Bradley West Project Draft EIR for future conditions are considered to be very conservative (i.e., high) and already reflect more robust economic conditions than currently exist. Please also see Response to Comment BWP-PC00011-11 for additional discussion regarding the traffic analysis year assumptions.

BWP-PC00011-35

Comment: - Paragraph 3.3.2 LAX Specific Plan Amendment Study states: "The LAX Master Plan, approved by the Los Angeles City Council in December 2004, is the strategic framework for future development at LAX. The LAX Specific Plan, approved in December 2004 as part of the LAX Master Plan Program, establishes procedures for approval of all projects defined in the LAXMaster Plan Program. The approval procedures are different for a subset of the LAX Master Plan projects. These projects are commonly referred to as the Yellow Light Projects. Such projects, as delineated in Section 7.H of the LAX Specific Plan, include the following:22
- Ground Transportation Center (GTC);
- Automated People Mover (APM) 2 from the GTC to the CTA;
- Demolition of CTA Terminals 1,2, and 3;
- North Runway re-configuration, including center taxiways; and
- On-site road improvements associated with the GTC and APM 2. And "22 Section 7.H of the LAX Specific Plan as approved in December 2004 also included the West Satellite Concourse and associated APM segments; however, those improvements were later removed from that section of the Specific Plan through a Specific Plan Amendment. As such, they are not considered to be Yellow Light Projects, which is consistent with Section V.D.1 of the Stipulated Settlement described herein."

Clarification of the footnote above and paragraph. The West Satellite Concourse was removed from the increased study projects after it was redesignated the Midfield Satellite Concourse which was not to have a new passenger or cargo entrance from the west.

Response: The comment is noted. No further response is required because the comment does not address the adequacy of the environmental analysis included in the Bradley West Project Draft EIR.

BWP-PC00011-36

Comment: - 3.3.3 LAX Development Projects Independent of the Master Plan "It is anticipated that a number of other, stand-alone construction activities at LAX that were not part of the LAX Master Plan would likely be underway concurrent with the construction of the Bradley West Project,..."

Two projects left off the list was the Dunes Restoration and the Adjacent Street Lighting in PDR which are part of the Stipulated Settlement. If these are not planned to be during this construction period, why not; when will they be completed? With the purchase of Park One, isn't it anticipated that some airport use will be done with this property before 2015? Other than Korean Airlines' cargo project, what other cargo facility enhancement projects are to done?

Response: A preliminary design feasibility study has been completed for the Dunes Restoration Project to identify those areas most suited for restoration given the existing budget. LAWA is in the process of identifying and evaluating the permits and approvals required to implement restoration activities and, based on those requirements will develop more detailed design and construction/restoration

plans. The timing of implementation will depend on the permit and approval requirements. Similarly, LAWA is working on preliminary design and construction plans for the Adjacent Street Lighting in Playa del Rey, and is evaluating the permit and approval requirements. Implementation of these projects is not, therefore, reasonably expected to occur concurrently with construction of the Bradley West Project.

With regards to LAWA's recent purchase of the Park One property, LAWA does not have any plans for development or additional uses of the property, and purchase of the property will not result in any changes to the existing uses at the site.

There are presently no other notable cargo-related projects at LAX, other than the Korean Air Cargo Terminal Improvement Project and the relocation of American Airlines cargo operations to the old United Airlines Cargo Building.

BWP-PC00011-37

Comment: - Table 3.1 List of Other Related Projects was not reviewed for completeness. What was the effective date that the data for this list was collected and its sources?

Response: As indicated on page 3-9 of the Bradley West Project Draft EIR, the list of other development projects in the City of Los Angeles and neighboring communities within the vicinity of the study area provided in Table 3-1 is based on consultation with representatives of the Los Angeles Department of Transportation (LADOT), Culver City, El Segundo, Hawthorne, Inglewood, Los Angeles County, and Manhattan Beach. The sources and dates for the information provided in Table 3-1 are identified in footnote 2 of Table 3-1 on page 3-21 of the Bradley West Project Draft EIR.

BWP-PC00011-38

Comment: - 4. SETTING, ENVIRONMENTAL IMPACTS, ANDMITIGATION MEASURES "Because the Bradley West Project was analyzed in the Master Plan EIR, this EIR is "tiered" from, and incorporates by reference, the LAX Master Plan Final EIR.24 This EIR provides project-specific information on the development of the Bradley West Project, focusing on potentially significant environmental effects that may not have been fully addressed in the prior EIR at the project level of detail..." and
"24 City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, April 2004. The Final EIR (State Clearinghouse No. 1997061047) was certified by the Los Angeles City Council on December 7, 2004."

There is disagreement as to the adequacy of a project level EIR tiered off of the 2004 Alternative D EIR which incorporates all by reference without including project detail information in this project level EIR. The initial summary did not address the 2004 Stipulated Settlement Agreement but it is mentioned subsequently. The Stipulated Settlement agreed that certain projects could go forward with only basic study per the LAX Specific Plan. Adequacy of the Program level EIR data was not accepted as a specific element of the settlement.

Response: The commentor's opinion regarding the adequacy of the LAX Master Plan EIR is noted. The LAX Master Plan Final EIR is adequate and fulfills the requirements of CEQA. The Bradley West Project EIR is appropriately tiered from the LAX Master Plan EIR as discussed in Section 1.2.3 of the Bradley West Project Draft EIR. Please also see Response to Comment BWP-PC00011-3.

BWP-PC00011-39

Comment: - Section 4. Setting, Environmental Impacts, and Mitigation Measures states: "As described in Chapter 3 of this EIR, in addition to the Bradley West Project, several LAX Master Plan improvement projects have recently been approved or are currently undergoing project design. These projects include the Crossfield Taxiway Project, which was approved in March 2009, and the Midfield Satellite Concourse Project and the Consolidated Rental Car (RAC) Facility, which are both currently in the design process. As indicated in Chapter 3, neither the Midfield Satellite Concourse Project nor the Consolidated RAC Facility is expected to be under construction at LAX during the Bradley West Project construction period, which is anticipated to start around late 2009. Hence,

these projects are not expected to contribute to cumulative construction-related impacts. The only LAX Master Plan project that is anticipated to be under construction concurrent with construction of the Bradley West Project is the Crossfield Taxiway Project...

Again, we are disappointed that these specifically approved, agreed upon projects are not planned to be started during the TBIT West construction period and have to ask why since they provide passenger experience improvements.

Response: Please see Response to Comment BWP-AL00001-1 regarding the phased implementation of LAX Master Plan projects.

BWP-PC00011-40

Comment: - Section 4.1 On-Airport Surface Transportation, 4.1.1 Introduction, contains: "As described in Chapter 2 of this EIR, the Bradley West Project would result in terminal building, aircraft apron, and taxiway improvements at LAX to accommodate new aircraft contact gates on the west side of TBIT. These contact gates would provide a more efficient and desirable option to the existing "hardstand" aircraft parking positions where aircraft park remotely and passengers are bused to and from the terminal building. In addition, the federal inspection services (FIS) facilities, such as U.S. Customs and Border Protection services, within TBIT would be improved as part of the project to provide increased and more efficient processing of arriving international passengers....

The Fentress Design recently paid for by LAWA includes CTA parking modifications. It is on display in the Clif Moore Administration building. Why isn't this discussed at least in concept for impacts? (see some general Fentress Design notes further below as well).

Response: The LAX design model on display at the LAWA East Administration Building represents a conceptual vision of improvements contemplated in the LAX Master Plan. As stated by Mayor Antonio Villaraigosa at the unveiling of the model on November 17, 2008 and subsequently repeated by LAWA management, implementation of the improvements depicted in the model is subject to further design and engineering and CEQA review. The improvements shown in the model for Tom Bradley International Terminal (TBIT) have undergone additional design and engineering, and are the subject of the Bradley West Project Draft EIR. Other improvements, such as those associated with the Midfield Satellite Concourse include a new Passenger Processing Facility at the location of Parking Structures 3 and 4 within the Central Terminal Area (CTA), are still in the preliminary design and engineering stage. It is anticipated that the proposed design, construction, and operation of those facilities will be addressed in a project-specific EIR for the Midfield Satellite Concourse Project, which will include evaluation of the types of issues raised by the commentor. It would be premature, speculative, and beyond the scope of the Bradley West Project EIR to attempt to address those issues.

BWP-PC00011-41

Comment: - Section 4.1.2 Methodology states: "For purposes of quantifying levels of service and potential impacts associated with curbside, intersection and roadway links, this study uses the impact thresholds used for the LAX Master Plan Final EIR surface transportation analysis29 which is also consistent with the thresholds defined in Los Angeles Department of Transportation (LADOT) Traffic Study Policies and Procedures.3

As noted in the other methodology paragraphs the curbside analysis was, and should be different than normal intersection analysis. How was level of service determined and rated? How was bus traffic incorporated into the model? How many traffic officers were assumed? Were the specific locations set aside for buses and other multi passenger vehicles actual or is it an "objective" to meet? How many times were buses in the outer lane making the inner lanes inaccessible?

Response: As discussed in Section 4.1.3.7 of the Bradley West Project Draft EIR, curbside Level of Service (LOS) is determined on the basis of a "utilization" factor which is calculated as the ratio of curbside demand, in linear feet, divided by the existing useable curbside length. The utilization factor is an indicator of the amount of congestion at the curbside. Table 4.1-6 and Table 4.1-7 on page 4-38 of the Bradley West Project Draft EIR show the LOS associated with the various utilization ranges for

curbside facilities for curbsides where passenger loading/unloading is restricted to a single-lane and facilities where active loading/unloading is allowed from multiple lanes. These procedures have been developed for use at airports based on information published by the Transportation Research Board, Special Report 215, Measuring Airport Landside Capacity, 1987, and Federal Aviation Administration Advisory Circular 150/5360-13, Planning and Design Guidelines, January 19, 1994. These utilization factors have been equated with ranges of volume/capacity ratios as needed to provide a direct correlation with the significance thresholds that have been established by the Los Angeles Department of Transportation (LADOT) for purposes of identify project impacts at roadways and intersections within the jurisdiction of the City of Los Angeles.

All commercial vehicle traffic, including bus traffic, was modeled using the Vehicle Trip Generation and Distribution Model as discussed on page 4-35 in Section 4.1.3.6 of the Bradley West Project Draft EIR. The model was calibrated to actual roadway traffic data obtained during the August 2008 design day based on information obtained from Automatic Vehicle Identification (AVI) records, video data and loop detector data obtained from LAWA. The typical vehicle modes that were simulated within the model include private vehicles, rental cars, taxicabs, limousines, FlyAway buses, long distance vans, shared ride vans, rental car shuttles, LAX shuttles, hotel/motel courtesy shuttles, private parking shuttles, and scheduled public transit buses. All commercial vehicles were then allocated parking spaces along the curbsides and were assigned dwell times based on data collected or obtained from LAWA.

The number of traffic officers on duty during the typical August design day were not separately identified or required as a part of this study. However, traffic conditions were calibrated to the Baseline (August 2008) peak hour conditions that reflect the level of curbside enforcement that was in place at that time. The level of curbside enforcement generally affects vehicle dwell times and the amount of private vehicle recirculation traffic using the lower level roadways. Baseline (August 2008) peak hour traffic volumes were then forecast to increase to 2013 peak hour conditions in proportion to anticipated growth in originating and terminating airline passenger activity. For the 2013 future conditions, it was assumed that future model inputs such as dwell times and the proportion of recirculation traffic, which are indicative of the level of curbside enforcement in place, would be similar to the levels observed in 2008.

Buses and other multi-passenger commercial vehicles were assigned to specific zones for passenger pickup and drop off on the basis of information obtained from LAWA and verified in the field.

Table 4.1-14 on pages 4-67 and 4-68 of the Bradley West Project Draft EIR provides a summary of the utilization rate of the TBIT outer (Arrivals Level) curbside during the 2013 peak hour periods analyzed. Although a direct count of the number of times that a bus in the outer lane blocks access to the inner lane roadway was not directly developed, the information in this table does provide an indication as to the level of congestion that would be expected at the various commercial vehicle zones. The Bradley West Project Draft EIR provides sufficient information in the impact analysis to determine whether there would be a significant impact under the significance thresholds provided in Section 4.1.6 of the Bradley West Project Draft EIR (see Section 4.1.3.7 which discusses how these thresholds apply to the curbside analysis). This level of detail is consistent with CEQA Guidelines Section 15151. As shown in Table 4.1-14, the average utilization rate at all of the commercial vehicle zones (except the hotel/motel and parking courtesy shuttle zone) would operate at utilization rates well below 100 percent, which indicate that the zone is adequate to accommodate the expected demands. However, the hotel/motel and parking courtesy zones are expected to exceed capacity under the 2013 Without Project condition. This implies congestion and potential delays associated with high demand in this zone. However, as shown in Figure 4.1-9 on page 4-41 of the Bradley West Project Draft EIR, the hotel/motel and parking courtesy zone is not adjacent to an entrance leading from the outer Arrivals Level roadway to the inner roadway and, therefore, should not impede access to the inner roadway.

BWP-PC00011-42

Comment: - Comment about Table 4.1-2, CTA Average Daily Traffic Volumes

The ratio of average daily traffic volume to the millions of annual passengers in the year for which it was calculated fluctuated by as much as ten percent in the years covered. What assumptions were made about the auto passengers ratio for future impacts calculations and why? What assumption is made about recirculation of autos and buses who missed a drop off the first time?

Response: (a) Table 4.1-2 on page 4-17 of the Bradley West Project Draft EIR depicts the percentage annual change in average daily traffic volumes and in million annual passengers accommodated at LAX between the years 2000 and 2008. The comment refers to the change in the ratio of average daily traffic to million annual passengers (MAP) fluctuating "by as much as ten percent in the years covered." This ratio of average daily traffic to MAP was not calculated in the table because the MAP value represents total passenger activity that includes connecting passengers that do not generate vehicle demand. As a result, a comparison of the Average Daily Traffic (ADT)/MAP ratio can be misleading if the proportion of originating and connecting passengers changes over time. The Vehicle Trip Generation and Distribution model was used to calculate traffic on the CTA roadways on the basis of the originating and terminating passengers on a typical Friday in the peak month of August for the TBIT peak hours. For the future year forecasts, the model assumes that traffic activity will increase in proportion to the growth in originating and terminating passenger volumes as determined from future 2013 airline passenger schedules. This is anticipated to be a conservative assumption given that LAWA has been successful in reducing CTA trips by expanding its FlyAway bus service.

The calculation of the ADT value in Table 4.1-2 has been modified. Specifically, the annual total was used to calculate a monthly average but was meaningless as a standalone number and has been deleted. Also, the calculation of "average daily traffic" volume at the bottom of the table has been adjusted to reflect a weighted average based on the number of days in the month rather than a simple average calculated as the sum divided by 12. (Similar changes were also made to Table 4.3-1.) The results do not affect the response discussed above. Please see Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR.

(b) It was assumed in the traffic model that all vehicles dropping off passengers on the Departures (Upper) Level would stop at the curbside or in the second lane to drop off passengers. It is not likely that a vehicle would recirculate to drop off a passenger; rather these vehicles would stop in the second lane or move down the curbside to find an available space. The level of service effects of this congestion are measured in the utilization factor, which is the ratio of the curbside demand in linear feet divided by the available curbside. However, for the Arrivals (Lower) Level, the traffic model assumed that some private vehicles would recirculate if the passenger they are picking up was not at the curbside. The volume of recirculating vehicles for each of the terminals was calculated by calibrating the traffic model to airport traffic volumes obtained on the basis of the counts on the airport return road, northbound traffic on East Way and West Way, and a license plate survey.

BWP-PC00011-43

Comment: - The section CTA Intersection Analysis states: "The Bradley West Project would not have an effect on the traffic volumes that directly access and stop at the other CTA terminal curbsides; thus, a detailed assessment of the linear capacity of these other terminal curbsides was not conducted. However, because TBIT-related traffic would bypass these other terminals, the key CT A roadway intersections were assessed to measure the effect that changes in the TBIT component of these intersection volumes could have on intersection traffic operations.

The assumption that CTA traffic will not impact the other terminals is not valid because autos do not know which lane they need to be in to be able to get to their TBIT destination. Many autos and buses stay to the right lanes blocking egress from the other terminals. How did the models take this into consideration?

Response: The Bradley West Project Draft EIR does assume, contrary to the comment, that traffic volume destined for TBIT would contribute to congestion in front of these other terminals. However, the analysis conducted at these other terminals focused on an assessment of the roadway operations at these terminal facilities (as discussed in more detail below) rather than an assessment of the "linear capacity" of these terminal curbsides as referenced in the comment and stated on page 4-47 of the Bradley West Project Draft EIR. As described in Section 4.1.3.7 of the Bradley West Project Draft EIR, the "linear capacity" pertains to the actual length of the curbside frontage that is available to accommodate vehicles that are stopping at the terminal to drop off or pickup up airline passengers. The assessment of the curbside capacity is a function of the curbside "utilization" which is a ratio of the curbside demand in linear feet divided by the existing curbside length. Given that TBIT-related traffic is not directly accessing the curbsides at the other CTA terminals, the linear capacity of the curbside frontage would not be affected by the Bradley West Project and, therefore, was not analyzed as part of the Bradley West Project on-airport surface transportation analysis.

However, the operation of the roadways and intersections adjacent to the other CTA terminals is affected by TBIT traffic that may be bypassing these other terminals, including vehicles using the right lanes adjacent to the terminal curbsides. To address this issue, the impact analysis for the CTA roadways system at the other terminals within the CTA was based on an assessment of the capacity of the CTA roadway lanes and key intersections to accommodate traffic demands and the effect that high volume of roadway traffic has on the ability for traffic to access or egress from the other CTA terminals. As pointed out in the comment, it is correct to assume that not all vehicles will stay in the left lanes when bypassing a terminal building. However, each of the CTA terminals is clearly signed and traffic will tend to take the path of least resistance. For example, if traffic is congested in front of Terminal 1 and only the left lanes are moving, traffic headed towards the downstream terminals would tend to move to the left to bypass the congestion. The model accounts for this by assigning vehicles to multiple lanes, including the right lanes entering the terminal area. The model then simulates the traffic conditions at each of the terminals by allowing vehicles to adjust to traffic conditions and curbside congestion at each terminal as drivers choose a lane on the basis of distance from destination, change speed, and operate according to varying degrees of aggressiveness based on factors coded in the model. The model was calibrated to existing conditions by adjusting these various input parameters until the model results replicated observed data as discussed on page 4-35 of the Bradley West Project Draft EIR.

Furthermore, as indicated in Table 4.1-16 of the Bradley West Project Draft EIR, the analysis does provide an assessment of the level of service in front of other CTA terminal buildings as a measure of total traffic volume (including TBIT traffic) that is using the CTA roadways and intersections in front of those terminals. It was not necessary, however, to analyze the linear curbside capacity for the other CTA terminals because traffic volumes originating or terminating only at the TBIT curbsides (e.g., private vehicle, taxicabs, limousines) do not stop at these other CTA terminals and the number of vehicles that stop at multiple terminals would not be materially affected by the project.

BWP-PC00011-44

Comment: - The traffic section of the DEIR states: "The through lane capacities are assumed to range from 300 vehicles per hour in the adjacent maneuvering lane up to 850 vehicles per hour in the outermost lanes. 45

We would expect that during peak hours the numbers would be far worse. What was actually used in the model. One has to just watch the traffic to see that the FAA planning guide is very optimistic.

Response: The values referenced in the comment pertaining to the information presented in Section 4.1.3.7 on page 4-48 of the Bradley West Project Draft EIR, represents the "capacity" of the roadway lanes comprising a typical airport roadway section that includes curbside parking in the innermost lane and not the volume of actual traffic, as suggested in the comment. The capacity of the roadway segment is a constant value that defines the maximum carrying capacity of the roadway segment prior to reaching gridlock conditions (LOS F). The value of the capacity for the roadway segment is calculated as the sum of the individual capacities of each through lane comprising the roadway segment. The innermost through lane adjacent to the active curbside has the lowest throughput capacity as a result of turbulence and lane blockages from vehicles maneuvering and stopping at

the curbside. Lane capacities increase for lanes farther from the curbside. The total capacity of the roadway segment is the denominator in the volume/capacity (V/C) ratio that is used to define roadway level of service. The volume does fluctuate over the course of the day, as the comment suggests.

This procedure for calculating roadway level of service based on the value of the V/C ratio is standard practice within professional transportation planning and engineering. The V/C ratios and associated levels of service are also defined separately for airport curbsides, roadways, and intersections. V/C ratios and LOS for curbside operations are defined in Table 4.1-6 and Table 4.1-7 on page 4-38; V/C ratios and LOS for signalized intersections are defined in Table 4.1-9 on page 4-48; and V/C ratios and level of service for airport roadway segments are defined in Table 4.1-11 on page 4-53 of the Bradley West Project Draft EIR.

BWP-PC00011-45

Comment: - Table 4.1-14, Curbside Analysis Results - 2013 With and Without Project Roadway Level Peak Period Curbside Zone1 Future 2013 With Project shows "Departures TBIT - level of service F Overall Airport2 - level of service F"

The above referenced chart says it all. LAWA could have save big dollars and done a back of the envelope analysis instead. Even with the questionable methods that may underestimate the vehicles the service is FAILURE. Why doesn't the DEIR provide alternative traffic mitigations? Were any traffic changes contemplated such as having drop off on both levels for departures or arrivals at peak times when one is underutilized?

Response: The curbside level of service conclusions summarized in Table 4.1-14, referenced in the comment, can also be found in Section 4.1.8.1, Table 4.1-18, of the Bradley West Project Draft EIR. The information presented in Table 4.1-1 refers specifically to the curbside level of service at the TBIT departures level curbside during the 2013 peak hour for TBIT departures (11:50 a.m. to 12:50 p.m. as depicted in Figure 4.1-15) as well as during the 2013 "Overall Airport" peak hour for departures (11:20 a.m. to 12:20 p.m. as depicted in Figure 4.1-16). As shown in Table 4.1-14, it is anticipated that the TBIT departures level curbside would operate at LOS F during both of those peak hours. This would be expected given that the TBIT departures peak hour and the overall airport departures peak hour closely overlap.

The information in Table 4.1-14 referenced by the commentor does not imply that curbside operations are LOS F for the overall airport as it appears the commentor has interpreted from this table. However, as shown in Table 4.1-20, the level of service condition on the departures level roadway adjacent to Terminal 1 is anticipated to operate at LOS F during the 2013 peak hours analyzed. It is important to note that it is estimated that the departures level roadway at this location will operate at LOS F conditions if the project were not implemented (i.e., 2013 Without Project). Under the 2013 "With Project" condition, this section of the departures level would also continue to operate at LOS F; however, the difference in traffic activity between the "With Project" and "Without Project" condition is only 26 vehicles. As discussed on page 4-6 of the Bradley West Project Draft EIR, implementation of the Bradley West Project would affect only the peaking characteristics of airline passenger activity and would not affect the overall number of passengers accessing the airport. (See also Section 4.1.1 of the Bradley West Project Draft EIR for additional discussion related to the facilities provided and their effect on passenger peaking characteristics; also refer to Figure 4.1-16 on page 4-63 for a chart depicting the similar levels of overall airport departing passenger activity for both the With and Without project conditions.) The LOS F condition on the departures level curbside at TBIT in 2013 is due primarily to ambient growth in international and domestic traffic that is not a direct result of implementation of the Bradley West Project.

The commentor asked why alternative traffic mitigation were not proposed. Mitigation Measure MM-ST (BWP)-1 was identified as a means to help reduce trips on the CTA roadway system through the increased use of high-occupancy vehicles. Please see Response to Comment BWP-PC00009-8 for more information regarding Mitigation Measure MM-ST (BWP)-1.

The commentor also asked why other potential traffic modifications, such as promoting passenger drop off on both levels for departures or arrivals at peak times when one roadway level is underutilized, were not considered. Such a system is not considered feasible because it would not reduce or avoid the significant impacts of the proposed project and would not be accomplished within a reasonable period of time taking into account environmental, legal, social, and technological factors described below.

There are three primary routes to enter the LAX CTA: northbound Sepulveda Boulevard, southbound Sepulveda Boulevard, and westbound Century Boulevard. In order to address the issue raised by the commentor, LAWA considered the use of portable changeable message signs on these approaches to suggest to drivers that they use the upper level roadway when the lower level roadway is congested (or conversely, the lower level roadway when the upper level roadway is congested). However, traffic conditions at the airport vary significantly by time of day (changing by the minute), day of week, and throughout the year. In order for the electronic messages to be changed, a technician would need to be dispatched to the sign location. It is estimated that it would take over 20 minutes for maintenance personnel to drive to and change the message on each sign approaching the airport. Since traffic conditions can change within a short period of time, electronic messages may be in place longer than desired, thereby providing drivers with instructions which would contradict real-time traffic conditions and result in traffic diversions that could worsen an already congested traffic condition on either the upper or lower level of the CTA.

In 2005, the Los Angeles Department of Transportation, as part of their Westchester Intelligent Transportation System improvement project, planned to install permanent, overhead changeable message signs on the approaches to LAX. LAWA and LADOT staff discussed the possibility that LAWA could request LADOT to display electronic messages on these signs during unique occurrences at the airport, such as airport security alerts and information regarding alternate parking locations if CTA parking was full. LADOT planned to use the signs to inform drivers of accidents, lane closures due to construction, and other unexpected traffic conditions. These signs were planned to be located away from the CTA entrances in order for drivers to have time to process the messages and change their routes accordingly. The proposed locations were southbound Lincoln Boulevard near La Tijera Boulevard, southbound Sepulveda Boulevard south of 76th Street/77th Street and westbound Century Boulevard west of Concourse Way. However, public opposition to the proposed signs, culminating with a public meeting held on January 17, 2006 at which several area residents expressed their view that the signs would lead to additional traffic through their community, resulted in LADOT withdrawing its plans to install changeable message signs on Lincoln and Sepulveda Boulevards.

While changeable message signs can be effective in informing drivers of unexpected traffic situations, LAWA does not believe the use of changeable message signs on the approaches to the LAX CTA would be effective at reducing the significant impact of the Bradley West Project, particularly when attempting to divert drivers from the lower (arrivals) level to the upper (departures) level. When drivers travel to LAX to pick up an arriving passenger, they often have made arrangements with the arriving passenger as to a meeting point. Installing an electronic message on the approach to the CTA suggesting that drivers use the (potentially) less congested upper level roadway is unlikely to influence drivers to change levels for fear that it would be more difficult in locating the arriving passenger. Furthermore, if changeable message signs were deployed, it would be necessary to install these signs well in advance of the point where the driver must decide whether to use the upper or lower levels. The installation of these additional signs could result in driver confusion as the drivers attempt to mentally process this directional information along with a plethora of information and wayfinding decisions that are required to navigate the airport. Such confusion, were it to occur, could even result in additional trips through the CTA as a result of the inability to locate arriving passengers, thereby increasing congestion.

Furthermore, the upper and lower levels are uniquely suited towards departures and arrivals, respectively. Each level contains facilities designed to meet the needs of arriving and departing passengers. For example, the departures level contains services and facilities tailored towards departing passengers which are not provided on the lower level, such as skycap services (curbside passenger and luggage check-in), interior passenger and luggage check-in and security screening facilities. Departing passengers on the arrivals level would therefore need to travel upstairs with

their baggage to gain access to these facilities at greater inconvenience. The arrivals level also contains services and facilities uniquely tailored towards arriving passengers which are not provided on the departures level, such as baggage claim, rentable luggage carts, meeter-greeter waiting areas and ground transportation shuttles and services. While drivers can currently choose which roadway to use to pick up or drop off their passenger, LAWA does not believe arriving and departing passengers would elect to use the departing and arriving levels beyond those few passengers who currently engage in this practice. As discussed above, LAWA believes this activity would also result in driver confusion. For the reasons discussed above, the suggestion would not reduce or avoid impacts of the proposed project and is not considered feasible.

BWP-PC00011-46

Comment: - Comment about Table 4.3-9 Construction Projects Concurrent with Bradley West Project Peak Construction

The basis of car trips and deliveries appears to be based on the total number of employees which is estimated based on the total cost of the projects. If the estimated cost of $2 billion increases to $5 billion will all of the estimates have to be recalculated? If not, why not?

Response: The construction-related employee and delivery trips associated with the Bradley West Project were estimated directly from the resource loaded schedule as discussed in detail on page 4-192 in Section 4.3.4.1 of the Bradley West Project Draft EIR. As discussed, the resource loaded schedule provides a detailed analysis of the monthly construction activities required to implement the proposed project. The construction information for the Bradley West Project was used to develop relationships that, in turn, were used to estimate construction-related traffic for the other concurrent projects that are currently less well defined than the Bradley West Project. Specifically, the ratio of total construction employee hours to total labor cost was calculated for the Bradley West Project and then applied to the estimated labor costs associated with the other cumulative projects to provide an estimate of total employee hours required over the course of each of these other projects. Secondly, the general distribution of employee hours over the course of the Bradley West Project construction program was used to allocate total employee hours over the course of the individual projects on a monthly basis.

It is important to note that only the estimated labor cost (absent of material or equipment cost) was used in determining trips for these other concurrent projects. As such, subsequent changes to the cost of equipment and materials for the Bradley West Project would have no impact on the construction employee activity estimated in these analyses given that the number of trips associated with these other concurrent projects is based on a constant ratio developed from the relationship of the resource loaded schedule with the overall labor cost associated with that level of activity. In addition, construction employee activity associated with the Bradley West Project is calculated from the resource loaded schedule which is based on the labor activities that are required to complete the Bradley West Project and not based on the total project cost (which include materials).

Furthermore, Scenario 3 and 4 of the analysis provides a sensitivity analysis by assuming a "worst-case" surge in the number of employees as based on the resource loaded schedule. These scenarios assume a 60 percent temporary increase in the peak period construction work force, based on a more intense daytime work shift. The multi-scenario analysis is also intended to cover all anticipated potential locations for construction employee parking and construction staging that may be used by the project during the peak construction periods. For the reasons described above, the analysis produced in this EIR is conservative in that all anticipated potential impacts have been identified and addressed such that it would not be necessary to recalculate the analyses based on unforeseen increases in the cost of the Bradley West Project.

BWP-PC00011-47

Comment: - Interesting factoid-- "Freight exports (which are generally high-value items) accounted for over 80 percent of the annual economic activity generated by international flights at LAX." Section 2.1

Does this mean that if we want to hold the line on air traffic congestion we should dissuade people and encourage cargo or is this just a statement of irrelevance if most of the cargo is coming inside the belly of the passenger aircraft?

Response: The text quoted by the commentor does not pertain to air traffic congestion and is not intended to imply any preference between cargo and passenger activity at LAX. Rather, the text is part of a larger discussion of the role of international aviation activity at LAX in the regional economy.

BWP-PC00011-48

Comment: - Regarding the conduct of traffic studies of intersections outside of LAX and the list of intersections

In conducting its traffic studies, particularly at the intersection of Sepulveda and Centinela, did LAWA factor in the recently approved Entrada high-rise office complex on the Radisson Hotel property site in Culver City? Why or why not? How about the upcoming construction of Howard Hughes Center that could add half million square feet of retail/industrial/housing?

Response: The proposed office development (i.e., the Entrada Office Tower Project) on the Radisson Hotel site in Culver City was included in the off-airport surface transportation cumulative analysis for the Bradley West Project. The project is listed on page 4-123, Table 4.2-5 (project 20) in Section 4.2 of the Bradley West Project Draft EIR.

Proposed development currently anticipated to occur at the Howard Hughes Center is also included in the off-airport surface transportation cumulative analysis for the Bradley West Project. The project is listed on page 4-132, Table 4.2-5 (project 132) in Section 4.2 of the Bradley West Project Draft EIR.

Table 4.2-5 in the Draft EIR is considered to contain the most current information provided at the time the document was prepared; however, given the fluid nature of the planning and development process within the local area, the listing of projects will continue to fluctuate over time. For example, the commentor indicates that almost half million square feet of retail/industrial/housing development is proposed at Howard Hughes Center; however, recent contact with a representative of the developer found that a major portion of the project is on hold, pending more favorable economic conditions. Specifically, LAWA staff spoke with Mr. John Hartz of Equity Office on November 18, 2008, regarding the project at 5901 Center Drive, which is a proposed 5-story, approximately 250,000 sq. ft. office building at the corner of Howard Hughes Parkway (project 132 in Table 4.2-5 in Section 4.2 of the Bradley West Project Draft EIR). Mr. Hartz indicated that, with the current downturn in the economy, he does not believe that the project would be constructed in the near future. LAWA staff contacted Mr. Hartz again on July 8, 2009 for an update and found no change in that position. It should be noted that even if the project were to begin construction before the completion of the Bradley West Project, the project's construction haul route is to use Howard Hughes Parkway to access the I-405 Freeway. As a result, construction traffic associated with this development project should not affect the Bradley West Project traffic study area.

If project 132 was delayed and constructed subsequent to the opening year of the Bradley West Project, the cumulative traffic would be less than analyzed in the Draft EIR. Thus, the off-airport surface transportation analysis for the Bradley West Project is a conservative analysis. Further, as noted above, given the fluid nature of the planning and development process within the local area, the listing of projects will continue to fluctuate over time. Any fluctuations not reflected in Table 4.2-5 of the Bradley West Project Draft EIR would be accounted for in the assumed 2 percent growth factor for background traffic used in the off-airport surface transportation analysis for the Bradley West Project.

BWP-PC00011-49

Comment: - In Appendix C-7, the preface to the traffic study the following conditional statements are made:

"It is anticipated that the aircraft arrivals and departures time schedules for the TBIT and other CTA terminals for the future 'With Project" and "Without Project" conditions would be essentially the same. The scheduled aircraft would also be the same except for minor differences pertaining to the "downsizing" of four aircraft from an Airbus A-380 to a smaller Boeing 777 under the "Without Project" condition due to taxiway limitations that would preclude the larger A-380 aircraft from accessing certain TBIT gates if the Project were not constructed.

"Given the similarities in aircraft schedules for the "With" and "Without Project" conditions, it is not anticipated that the TBIT improvements described above would affect the number of daily airline passengers that would access the TBIT or any of the other terminal buildings in the CTA during the future 2013 year being analyzed for this EIR. Subsequently, it is anticipated that the daily airline passenger volumes for the "With Project" and "Without Project" conditions would be essentially the same. Based on this assumption, it is estimated that the daily roadway traffic volumes between the two future conditions would also be approximately the same."

Here is a series of four questions/comments related to the above two paragraphs from Appendix C-7:

a. Which airlines are assumed to have downsized from four Airbus A380's to Boeing 777's?
b. Were any of these airlines consulted about their plans if additional A380 capable gates were not added to TBIT? What are the names of those airlines? Did those plans include aircraft substitution for a smaller aircraft? Did those plans also include adding frequencies (additional flights) to make up for lost capacity of an A380 vs. a 777?
c. What is the tolerance in variation of daily passenger volumes between "without project" and "with project" to be considered "essentially the same"? Please provide raw numbers as well as percentages.
d. Based upon what has been publicly released to the aviation media, here is our analysis on passenger capacity differences. Seatguru.com was used as a reference for seating capacity, Wikipedia.org was used for airline fleet plans and individual airline websites were used for scheduling.

Qantas Airways (QF). A380's will replace QF's Boeing 747-400's. QF has not made any decision to order the Boeing 777 or the Airbus A350XWB. QF's A380's seat 450 passengers while their 747-400's vary in seating capacity from 307 to 412. This causes a seat difference of 107 to 38. Qantas has up to 5 daily flights- 2 to Sydney, 1 to Melbourne, 1 to Brisbane and 1 to Auckland. There is a potential for up to a daily 500-seat difference between the A380 and 747. With up to more 500 passengers, this would be a Significant difference in TBIT curb front traffic.

Singapore Airlines (SQ). A380's and Boeing 777's will replace SQ's Boeing 747- 400's. The seating capacity for an SQ A380 is 471 passengers. The SQ 747- 400 seats 375 passengers. The 747-400 is used on the LAX-Tokyo-Singapore route. The SQ 777-300ER seats 278 passengers while the SQ 777-200ER seats 286 passengers. If SQ replaces the 747-400 with an A380 on the Tokyo route, then there is an increase of 96 seats over the current baseline. If a 777 is used, then the seat count difference is 193 (777-300ER) and 185 (777-200ER) less vs. an A380 and 97 (777-300ER) and 84 (777-200ER) less vs. a 747-400. If SQ does not replace the 747-400 with an A380 on the Tokyo route, then they could substitute two 777's that will increase TBIT curb front traffic significantly.

Emirates Airline (EK). EK currently flies the Boeing 777-200 LR (Long Range) to LAX with a 266-seat capacity. EK has been public about wanting to place the A380, for which it is the largest customer, on the LAX-Dubai route once 2 tons of extra weight is taken off of the aircraft. EK most likely will use the 489-seat version of the A380 to fly into LAX. This is a difference of 223 seats- again a significant difference in TBIT curb front traffic.

Korean Air (KE). KE has announced that it will fly the A380 on the Seoul-LAX route. The KE A380 will replace a 333 seat Boeing 747-400. KE's A380 seating plans have not been announced.

Assuming that KE has 450 seats in their A380, then there would be a 117 -seat difference with the 747-400 and a 169-seat difference with the 777-300ER. Again, another significant difference.

Other airlines that operate out of TBIT that have not made their A380 seating plans and scheduling plans known include: British Airways, China Southern, Lufthansa, Malaysian and Thai. Furthermore, Air France and Virgin Atlantic, which both operate of Terminal 2, have orders for the A380. These other airlines, especially Virgin Atlantic which delayed its A380 orders to 2013 due to gate compatibility problems at LAX, can cause increases to ground traffic at LAX. Virgin does intend to operate the A380 to LAX, but it is not clear as a replacement for the two current daily flights with 747-400 and Airbus A340-600's or as a capacity increase. The latter is more likely.

Furthermore, the A380 has only 200 orders so far with little prospects for more. There are very few airports in the United States that not only can physically accommodate the A380, but also provide the passenger volume to fill the seats. Las Vegas will not make any improvements to McCarran even as a diversion airport for the A380. Only LAX, San Francisco, Chicago, New York-JFK, Washington Dulles, Miami and perhaps Atlanta will likely see A380 flights. Airlines come to LAX not for the facilities, but for the tremendous passenger volume available in the second largest metropolitan area in the United States. This is why LAX is the number origin and destination airport in the world.

Since the dawn of the Jet Age in 1958, airline passenger traffic has doubled about every 20 years. Aircraft capacity has increased. Since the 1990's, frequency has become more important in international city pairs. We see that in multiple daily flights on the same airline for Paris (Air France), Hong Kong (Cathay), Sydney (Qantas) and multiple airlines for London (American, British Airways, United, Virgin Atlantic). After 9/11, airlines have worked hard to "right size" aircraft to their routes. In the international routes, we have seen this with 747-400's being replaced by 777-300ER's as in the cases of All Nippon Airways (ANA), Japan Airlines (JAL) and Air France. Despite the economic depression of 2009, the longer-term trends of more passengers, more airplanes with more seats and more flight frequencies will continue onward and upward. The ground traffic model needs to reflect these realities. A No Project and Project will have different numbers, with Project being significantly higher- perhaps 600 more passengers per day.

Response: The comment addresses two introductory paragraphs in Appendix C-7, specifically, the third and fourth paragraphs on page one of Appendix C-7. The comment presents four questions/comments related to these paragraphs.

As an initial matter, text in the third paragraph of Appendix C-7 regarding anticipated aircraft arrival and departure time schedules used in the off-airport surface transportation analysis has been revised to clarify the assumptions regarding the type of aircraft that could be accommodated by improvements that are part of the proposed Bradley West Project. The third paragraph on page 1 of Appendix C-7 should read as follows:

"It is assumed that the aircraft arrival and departure time schedules for the TBIT and other CTA terminals for the future "With Project" and "Without Project" conditions are identical. The scheduled aircraft would also be the same except for minor differences pertaining to the "downsizing" of four aircraft from four ADG VI to four ADG V aircraft under the "Without Project" condition due to taxiway limitations that would preclude the larger A380 aircraft from accessing certain TBIT gates if the project were not constructed."

Page 1 of Appendix C-7 has been revised accordingly. Please see Chapter 3, Corrections and Additions to the Bradley West Project Draft EIR. These minor revisions clarify assumptions underlying the analysis but do not alter the conclusions of the surface transportation or other analyses provided in the Bradley West Project Draft EIR.

The following addresses the specific points addressed in the questions/comments:

a. The commentor asks which airlines were assumed to downsize four aircraft from Airbus A380s to Boeing 777s. Consistent with the clarifications shown above, four ADG VI aircraft were assumed to be downsized to four ADG V aircraft, as follows: Asiana Airlines (from a Boeing 748 to a Boeing

777), Air France (from an Airbus A380 to a Boeing 777), China Southern Airlines (from an Airbus A380 to a Boeing 777) and Qantas (from an Airbus A380 to a Boeing 747.)

b. The commentor asks whether airlines were consulted regarding their plans if additional A380 sized gates were not added to TBIT. Airlines were not consulted directly with regard to the analysis for the Bradley West Project, however, LAWA has been in discussions with several airlines (e.g., Qantas and Air France) regarding the availability of A380 contact gates. For an airport the size of LAX, airline service is based on passenger demand, and the airlines typically choose the smallest aircraft from their fleet with adequate range to meet that demand. If additional A380 capable gates were not added to TBIT and airlines were consequently not able to provide long-range international service on the A380, airlines would first rely on smaller aircraft to accommodate demand to the extent possible. As referenced in Section 2.4.5 of the Bradley West Project Draft EIR, additional information related to forecast operations and fleet mix assumptions can be found in the 2008-2013 flight schedule documentation.1

c. The commentor asks for additional detail and raw data supporting the conclusion that the daily passenger volumes for the With Project and Without Project scenarios are "essentially the same." (See page 1, paragraph 4, in Appendix C-7.) Under the Without Project scenario, it was assumed that additional ADG VI aircraft could not be accommodated at TBIT gates, and analysis therefore assumed four fewer ADG VI aircraft would be accommodated than under the With Project scenario. The Without Project scenario further assumed that these four ADG VI aircraft would be downsized to four ADG V aircraft. Analysis assumed the same level of passenger demand under either scenario; however, under the Without Project scenario, analysis concluded that fewer passengers could be accommodated because the smaller ADG V aircraft can accommodate fewer passengers. Under the Without Project scenario, passenger demand was redistributed among other flights in other parts of the day, originating from or departing to the same market. Assuming that as many passengers as possible were served on other flights, a total of 158 passengers in the 2013 Without Project scenario schedule could not be accommodated, representing approximately .07 percent of the projected daily passengers for August 2013 (i.e., 158 of 214,772 total daily passengers.)

d. The commentor provides an alternative analysis that suggests increased A380 activity at LAX will result in greater capacity in the form of additional daily seats which will in turn generate more passengers at the TBIT curb front. As discussed above in response to comment c., airline service to and from LAX is based on passenger demand, and airlines will select fleet aircraft that provide a level of service attractive to the most passengers, including appropriate flight times and aircraft type, at the lowest operating cost (typically meaning the largest available aircraft with adequate non-stop range to reach the destination). Based on this, the Bradley West Draft EIR assumed that scheduled aircraft would be the same under the "With Project" and "Without Project" conditions except for minor differences pertaining to the "downsizing" of four ADG VI aircraft to four ADV V aircraft. In other words, although construction of the Bradley West Project would remove the taxiway limitations that currently preclude A380s from accessing certain TBIT gates, removing these limitations will not increase market demand for flights. As noted in response to comment b. above, airlines would not opt to provide A380 service unless demand warranted it. Because the Proposed Project would not increase market demand, it is not reasonable to assume that airlines will immediately replace the aircraft that the commentor suggests with A380s. Even as demand increases, airlines can meet this demand with their existing fleet in several ways, taking into account the best and most economic aircraft allocation at all their destinations, not just LAX. For example, an airline might use two Boeing 777s to serve a demand of 600-700 passengers, rather than use one A380 for the first 450 and another smaller aircraft for the remaining 150-250 passengers, particularly if the airline does not have an aircraft appropriately sized for 150-250 passengers with an adequate range for international travel.

The analysis in the Bradley West Project Draft EIR reasonably relied on these assumptions to determine the peak traffic hours for the 2013 With and Without Project scenarios, as described in Section 4.1.5.1. Figure 4.1-13 in the Draft EIR depicts the rolling hourly terminating passenger flows at the TBIT curbside for the 2013 With and Without Project scenarios. Figure 4.1-15 in the Draft EIR depicts the rolling hourly departing passenger flows at the TBIT curbside for the 2013 With and Without Project scenarios.

1 Ricondo & Associates, LAX TBIT Reconfiguration Project Draft EIR 2008-2013 Design Day Flight Schedule Documentation, March 2009.

BWP-PC00011-50

Comment: - In Appendix C-7, it is noted that the traffic data was collected in August 2008. Why was this month selected? During the NOP scoping process and a various other public meetings on LAX Master Plan issues over the years, the public has requested that traffic studies be conducted when Loyola Marymount University (LMU) is in session. A significant portion of the traffic generated by LMU goes through the intersection of LMU Drive and Lincoln Boulevard where LMU's main entrance is located. Due to the timing of the LAX traffic study, traffic on Lincoln Boulevard may be undercounted for those 9 months of the year when LMU is in regular session.

Response: Appendix C-7 of the Bradley West Project Draft EIR summarizes the methodology and trip generation estimates for off-airport vehicular traffic associated with the Bradley West Project. As described on page 1 of Appendix C-7, the roadway trip generation analysis is based on traffic activity occurring during a typical Friday in August 2008. August was selected as the basis for the airport-related trip generation because it represents the peak month for airport-related traffic activity (see Table 4-3.1 on page 4-183 of the Bradley West Project Draft EIR, which shows that August is typically the peak month for airport roadway traffic, followed closely by July). Friday is generally the busiest day of the week for CTA roadway traffic. Given the airport is the single largest traffic generator within the study area, it was determined that analysis of the off-airport roadway system should be based on peak August 2008 conditions. The use of traffic volumes collected during the peak summer months provides a more conservative assessment of traffic conditions (i.e., worse level of service) within the vicinity of the airport than would traffic collected during a period when the airport is not operating at peak activity levels.

As discussed on page 4-102 in Section 4.2.3.2 of the Bradley West Project Draft EIR, "Intersection turning movement counts were collected during the weekday morning, midday (MD) and afternoon time periods at the 71 aforementioned locations in July and August 2008. July and August are considered to be the peak months for airport related traffic around LAX; therefore additional seasonal adjustments were not required to convert the counts to peak month conditions. Collecting counts during the peak months for airport-related traffic provides for a more conservative analysis as discussed on pages 4-14, 4-90, and 4-172 of the Bradley West Project Draft EIR. The study area intersections are located in close proximity to the airport and influenced by airport-related traffic activity; therefore, obtaining traffic count information when the airport is operating at peak conditions is important in obtaining a conservative estimate of traffic activity in the study area.

The commentor indicated that collecting traffic at the intersection of LMU Drive and Lincoln Boulevard during the August peak month may result in an undercount at that location for the nine months when LMU is in regular session. Loyola Marymount University (LMU) is located north of the airport, approximately 2.5 miles driving distance from the entrance to the CTA. As described previously, the traffic data collection and resulting analysis for the off-airport roadway system was conducted during August, which represents the peak month for airport-related traffic around LAX. It is recognized that individual businesses, schools, and other traffic generators may produce localized peak traffic conditions that may differ from the airport. For example, each individual traffic generator would likely experience peak seasons and produce peak hour conditions at their primary access locations that would differ from that of the airport and the overall study area. However, given the large scale of the traffic study analysis area, it is important to analyze the roadway network for the overall ambient peak condition which is influenced by the airport as the largest trip generator within the study area and to assess conditions when the project is producing the highest number of trips and would produce the most potential impacts within the study area. There are numerous large buildings, shopping centers, business campuses, educational facilities, sport and entertainment centers, and other facilities within the approximately 37 square-mile study area for the Bradley West Project off-airport surface transportation analysis (please see Figure 4.2-2 of the Bradley West Project Draft EIR). Many of these facilities generate localized traffic that can affect the roadway network in the immediate vicinity of their site, and with seasonal and hourly peaking characteristics that may differ from the overall study area roadway network. It would not be feasible to study the traffic peaking characteristics of every individual trip generator within the geographic

scope of the Bradley West Project off-airport surface transportation analysis shown in Figure 4.2-2. Nor is this level of detail required by CEQA. As discussed under CEQA Guidelines Section 15204(a), "reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commentors." (See also CEQA Guidelines Section 15151.)

As shown in Table 4.2-6 of the Bradley West Project Draft EIR, the magnitude and severity of the traffic impacts at and surrounding LMU would be minimal. The commentor references the intersection of LMU Drive and Lincoln Blvd (Intersection #104 shown in Figure 4.2-2). Intersection #104 would operate at LOS A with and without the proposed project in 2013 in the AM, MD, and PM peak hours. (See Table 4.2-6 of the Bradley West Project Draft EIR.) The intersection to the north of Intersection #104 (Intersection #22) and the intersection to the south (Intersection #111) would operate at LOS A and LOS B, respectively, with and without the project in the AM, MD, and PM peak hours. (See Table 4.2-6 of the Bradley West Project Draft EIR) As discussed above, the geographic scope of the Bradley West Project off-airport surface transportation analysis covers approximately 37 square miles. It is therefore not feasible or necessary to analyze individual traffic peaking characteristics within the geographic scope of the off-airport surface transportation analysis.

BWP-PC00011-51

Comment: - In Appendix C-7, Exhibits 2 and 5 do not show a line for the No Project.

Response: Exhibit 2 and Exhibit 5 within Appendix C-7 provide projected originating and terminating passenger flows for all terminals in the CTA other than the TBIT. The facilities being implemented as part of the Bradley West Project would not produce a measurable difference in airline passenger activity at these other CTA terminal facilities (see passenger volume numbers in upper right-hand box of each exhibit, which indicates no difference between "2013 No Project" and "2013 with Project"). Therefore, the "2013 with Project" and "2013 No Project" scenarios for the other CTA terminals are the same, and the graph lines for the two scenarios are one in the same on each of the subject exhibits.

BWP-PC00011-52

Comment: - In Appendix C-7, why does the line for 2013 with project spike around 14:10? For the 2008 baseline, why the line spike at 22:00?

Response: Although not specifically identified by the commentor, it is assumed that the commentor is referring to Exhibit 3 "Terminating Passenger Flow at Curbside" based on the hours identified in the comment. Two spikes, or peaks, are identified by the commentor. The first peak in question occurs under the 2008 existing conditions scenario representing an evening peak recorded at approximately 22:00. The second peak occurs under the 2013 With Project and No Project scenarios representing a mid-afternoon peak estimated at approximately 14:10.

Peaks in terminating passenger flows are directly linked to peaking and metering characteristics associated with the following two elements:

1. Peaking characteristics of the associated flight schedules.

Terminating passenger flows at the curbside originate from the assumed aircraft arrival times at the gates included in the respective flight schedules. The 2008 existing conditions schedule is based on a published Official Airline Guide (OAG) schedule for Wednesday, August 20, 2008. The 2013 With Project/No Project scenario schedule was developed based on the 2008 OAG schedule, adjusted to capture sizeable changes in frequencies and markets served that were announced in early summer 2008. Several major airlines announced substantial schedule reductions for the fall 2008 and winter 2009, reductions that would not have been captured in the August 2008 OAG. A crosscheck of the 2008 OAG schedule against summer 2009 published schedules was also

undertaken to corroborate scheduling trends such as frequencies and markets served. Therefore, the 2008 existing conditions and the 2013 With Project/No Project schedules return different peaking characteristics reflected in Exhibit 3 of Appendix C-7.

2. Processing and metering times associated with the various terminal components and passenger facilities and processors.

Assumptions are made to identify the time it takes for arriving passengers to reach the curbside. Each passenger behavioral pattern is assessed, such as the use of restrooms or concessions after deboarding aircraft, average walking times and the dwell time leading to the next passenger facility or processor. For international passengers, additional processing time for immigration and passport control, customs and FDA checks are applied to the arriving passenger distributions. Finally, before reaching the curbside, passengers are metered by the processing times at the baggage claim areas. Each of these processors meters the flows of passengers based on the assumed processing times associated with the existing facilities (2008 and 2013 No Project scenarios) or improved facilities (2013 With Project scenario).

Therefore, based on the peaking characteristics associated with the existing and future flight schedules and the passenger processing/metering characteristics of the existing and improved terminal facilities, the 2008 conditions and the 2013 With Project/No Project schedules result in different peaking times during the day such as those shown in Exhibit 3 of Appendix C-7, in which the 2008 total arriving passenger flow peaks at approximately 22:00 and the 2013 With Project total arriving passenger flow peaks at approximately 14:10.

BWP-PC00011-53

Comment: - In Appendix C-7, Table 1 has large discrepancies between Originations and Terminations. What accounts for those discrepancies?

Response: Table 1 in Appendix C-7 of the Bradley West Project Draft EIR delineates the volumes of originating passengers ("originations") and terminating passengers ("terminations") at the two terminal areas of TBIT and "Other" (which includes all terminals in the Central Terminal Area except for TBIT).

The numbers of originating and terminating passengers are based on forecasted aircraft gate assignments at TBIT and other terminals. Because passengers arriving on international flights need to be processed through Federal Inspection Service (FIS) facilities, aircraft carrying international passengers are assigned (or gated) to terminals with FIS facilities. Currently, an aircraft arriving at TBIT may later be towed to another terminal for departure. Accordingly, passengers traveling on a given airline may arrive at TBIT whereas departing passengers flying on the same airline may depart from a different terminal. Alaska Airlines and Qantas are among the carriers that were assumed to arrive at TBIT for FIS processing of international passengers and depart from Terminals 3 and 4, respectively.

Therefore, gating of aircraft at TBIT for arrivals and gating at another terminal for departures directly leads to the subject differences in the volumes of originating and departing passengers processed at the curbside, as evidenced in Table 1 of Appendix C-7.

BWP-PC00011-54

Comment: Comments/questions below cover the general Fentress Design concept for TBIT and are included here since this is the first project which has been brought forward as part of that design:

While the Fentress design for TBIT seeks to architecturally capture the physical essence of Southern California- sun, waves and mountains- the design creates various potential problems to be addressed:

1. Traffic flow. The new check-in building demolishes the ramps between the upper and lower level roadways. This limits an option for drivers to change levels on either side of the Central Terminal Area (CTA). The introduction of a curb face on what is the short-cut road to Terminal 5 may slow traffic circulation in the CTA that generally becomes clogged near Terminal 4.

2. Parking. The T3 and T4 parking garages will be torn down and replaced with a three-story underground parking garage. It is assumed that the only entrances to the proposed garage will be via the arrivals level. This negatively affects travelers using the departures level who will then have to circle back around to the arrivals level at the entrance to LAX thus adding congestion. It appears that the number of parking spaces may be reduced from the current number in T3 and T4.
3. Way finding. Passengers may be confused as to which check-in building to use the new TBIT or the old TBIT for their airline? The same problem also occurs for parking.
4. Emergency access. The helipad on the T4 garage is eliminated in the design. LAFD needs a helipad for emergency evacuation on buildings over 3 stories in height. A heliport needs to be added back into the design. There is also concern about the sky bridge from the terminals to the concourses for evacuation purposes. The LAFD needs to be brought into the design process early to make certain their needs are addressed.
5. Security. The new check-in building is open on four sides to a possible terrorist attack. With a glass design, the glass must be blast glass. LAWA has yet to implement this and other recommendations from the RAND security studies on LAX. Again, LAWA should include the LAWA Police Department, TSA and CBP on designing security into any facilities- whether new construction or remodeling. Furthermore, the proposed underground parking garage and its proximity to a new Central Utilities Plant may make the proposed check-in building a highly vulnerable terrorist target.

Response: The LAX design model on display at the LAWA East Administration Building, which the comment refers to as "the Fentress Design," represents a conceptual vision of improvements contemplated in the LAX Master Plan. The Midfield Satellite Concourse Project, which includes the potential improvements described by the commentor, is still in the preliminary stages of design and engineering. The Midfield Satellite Concourse Project is represented in the conceptual design model. Analysis of impacts related to the Midfield Satellite Concourse Project improvements would be premature and speculative, as explained in Response to Comment BWP-PC00011-40, and therefore, the issues raised by the commentor are beyond the scope of the Bradley West Project Draft EIR. With regard to how the improvements associated with the Bradley West Project relate to the five issue areas enumerated in the comment, please see below.

1. Traffic Flow: Section 4.1 of the Bradley West Project Draft EIR addresses on-airport traffic impacts. The project improvements proposed for TBIT would not result in any elimination of roads or ramps within the Central Terminal Area (CTA). Mitigation Measure MM-ST (BWP)-3 recommended in Section 4.1.9 of the Draft EIR would provide for the widening of World Way across from TBIT to increase the capacity of the outer roadway and reduce delay for vehicles that experience upstream CTA roadway congestion. The Bradley West Project does not propose or involve any introduction of a curb face on West Way, referred to in the comment as "the short-cut road to Terminal 5."

2. Parking: The Bradley West Project would not result in the elimination and replacement of parking structures T3 and T4 or a change in access to these structures. Implementation of the Bradley West Project would not result in the elimination of parking spaces within the CTA.

3. "Way Finding": The improvements proposed by the Bradley West Project for TBIT would provide for additional and improved passenger processing areas, such as those associated with check-in, security screening, customs inspections, and baggage claim area; however, those improvements would occur within the existing TBIT building as improved. Landside passenger access points at TBIT would generally remain the same as today.

4. Emergency Access: Implementation of the Bradley West Project would not result in the elimination of any existing helipads and does not propose any skybridges. The project does, however, provide for more floor area within TBIT, which would allow improved general circulation areas and routes, and additional space for emergency personnel and equipment. Such improvements would enhance emergency access.

5. Security: The existing and proposed check-in areas at TBIT are situated toward the center of the building, well-removed from the CTA roadways. LAWA has maintained ongoing communication and coordination with emergency/security agencies, such as the LAWA Police Department, the City

of Los Angeles Fire Department, the federal Transportation Security Administration, and the federal Customs and Border Protection, in the planning and design of the Bradley West Project and in obtaining the necessary concurrences from these agencies.

BWP-PC00011-55

Comment: Thank you for your consideration of these issues and we are available to discuss these in the future as you see fit. We again thank you for your efforts to make LAX safe, secure, and convenient and support this effort.

Response: The comment is noted. In accordance with CEQA Guidelines §15088, LAWA has prepared written responses to all comments received on the Bradley West Project Draft EIR. These responses are provided herein as part of this Final EIR. The responses to comments on the Bradley West Project Draft EIR will be considered by the decision-makers during project deliberations.

BWP-PH00001 Schneider, Nan None Provided 6/6/2009

BWP-PH00001-1

Comment: My concern is that Tom Bradley doesn't add enough square footage for the newer larger aircraft in the holding areas. That, I feel that having 300 (indecipherable speech) holding over 800 that that is an issue.

It just concerns me because you are going by the configurations that are current in the aircraft and the possibility that they could go up to 500. But we saw the same thing with the 747 originally they had large lounges and mostly first class places and then before you knew it there was three times the number of seats and you know the tray tables can barely come down. Its -- you have to plan out far enough in advance that you know if this comes to pass.

Yet.

Response: Please see Responses to Comments BWP-PC00002-2 and BWP-PC00008-2 regarding the number of passengers per aircraft and the sizing of the proposed facilities to accommodate A380 and other new generation aircraft.

BWP-PH00002 Schneider, Denny ARSAC 6/6/2009

BWP-PH00002-1

Comment: Denny Schneider, President of ARSAC. I reserve the right to revise and amend my and extend my remarks I should say and you will get written comments as well. The biggest challenge that we have right now is looking at the EIR, its the Draft EIR, has the parking on the north side for the construction workers and we've discussed this in nauseating detail with several of the LAWA management. We are assured that that will not show up in the Final Draft. We want to make sure that those come that alternatives in addition to the one that's shown are also looked at such as the top floor of the CTA which would also be very convenient for Bradley which would allow workers to get there quickly is also addressed.

Response: Please see Response to Comment BWP-PC00011-28 regarding the Bradley West Project Draft EIR's evaluation of proposed and potential construction staging/parking areas.

BWP-PH00002-2

Comment: I have one on process, Denny Schneider again. For future meetings of this sorts I recommend that there be a postcard send out instead of a long letter where the dates are buried in the fine print.

Response: Please see Response to Comment BWP-PC00011-4 regarding notification of the Bradley West Project Draft EIR public meetings. In addition to containing information pertaining to the proposed

project, the notices contained information pertaining to the LAX Compliance Review process. As such, the information would not fit on a postcard and was instead provided on an 81/2" by 11" sheet of paper.

BWP-PH00003 Ackerman, Robert ARSAC 6/6/2009

BWP-PH00003-1

Comment: Good morning, Robert Ackerman, Vice President of ARSAC. Another consideration for parking could be the former Delta Airlines parking garage down on Century and Avion Drive so it is certainly something to consider. South parking is definitely preferable to north parking, certainly makes sense with the 105 Freeway dumping out here on Imperial Highway for construction workers to go back and forth.

Response: As described in Section 4.3 of the Bradley West Project Draft EIR, construction traffic associated with the project is projected to result in significant impacts at the following four intersections, depending on the analysis scenario:

La Cienega Boulevard and Century Boulevard (Intersection #36)
Sepulveda Boulevard and Manchester Avenue (Intersection #114)
Imperial Highway and Main Street (Intersection #68)
Imperial Highway and Pershing Drive (Intersection #69)

Feasible mitigation measures are available to reduce impacts at Intersections #68 and #69 to a level that is less than significant; however, impacts at Intersections #36 and #114 would remain significant and unavoidable.

Based on the locations of these intersections, as shown in Figure 4.3-2 of the Bradley West Project Draft EIR, the placement of construction parking at the former Delta parking structure, located at the southeast corner of Avion Drive and Century Boulevard (approximately mid-way between Sepulveda Boulevard and Aviation Boulevard), would likely result in greater impacts to Intersections #36 and #114. This is due to the fact that the main access routes to the former Delta parking structure would include Sepulveda Boulevard and Century Boulevard. Additionally, placement of contractor employee parking at the former Delta parking structure would still require the shuttling of workers to and from work areas on the west end of the airport since providing employee access through the Central Terminal Area (CTA) poses significant logistical problems. Therefore, using the former Delta parking structure for construction parking would be infeasible and LAWA is not required to analyze it as a mitigation measure or alternative. (See CEQA Guidelines Sections 15126.4 (a), 15126.6 (a).) Please see Response to Comment BWP-PC00011-28 for additional explanation as to these problems.

BWP-PH00003-2

Comment: I would also like to continue a little bit on Nan's comment about holdrooms. One of the things that the architect did consider in the new concept for the Tom Bradley Terminal was a larger version of the A380 and you can never have enough seats in holdrooms and so certainly that should be looked at to accommodate it. And it's correct, a lot of the versions of the A380 right now have about 450 seats or so but that won't prevent some other airline in the future, usually some discount carrier when those A380s end up in the secondary market, from cramming into over 800 passengers which that aircraft can be certified for. Thank you.

Response: Please see Responses to Comments BWP-PC00002-2 and BWP-PC00008-2 regarding the number of passengers per aircraft and the sizing of the proposed facilities to accommodate A380 and other new generation aircraft.

BWP-PH00004 Quartzstrom, Dan None Provided 6/6/2009

BWP-PH00004-1

Comment: My name is Dan Quartzstrom, I live in Westchester. I just want to somewhat repeat what I said earlier. As somebody that lives north of the airport I am concerned about anything that extends any of those boundaries northward. And, I just want to make sure that in our conversations about this that the footprint for the proposed terminal is not going to be something set in stone in such a way that it precludes solutions about those runways coming south. So, I am looking for assurances that this new terminal is not going to do anything to move any of the boundaries of the airport north. Thanks.

Response: The Bradley West Project would not result in any changes to the airport boundaries and would not involve moving any runways closer to Westchester. Moreover, the new concourses have been designed to allow for the potential relocation of Runway 7R-24L to the south, as included in the LAX Master Plan, subject to completion and conclusions of the LAX Specific Plan Amendment Study.

BWP-PH00005 Skjerven, Mark None Provided 6/6/2009

BWP-PH00005-1

Comment: Good morning, Mark Skjerven of Playa Del Rey - resident. Just want to say fully support this program Mike. I think it is a great plan. Still leaves some flexibility on the north runway issues. Still have, again as stated before, concerns about the contractor staging area thing but I think all that could be worked out using this the Pershing site. But no, I fully support the plan, thank you very much.

Response: The comment is noted. Please see Topical Response TR-BWP-ST-1 regarding the refinement and additional evaluation of Alternative 4: Construction Staging/Parking Areas-Optimize Use of West Construction Staging Area to Include Worker Parking. This alternative represents a more refined design to optimize the use of the West Construction Staging Area to include construction worker parking. These refinements were designed in response to comments received on the NOP for the Bradley West Project Draft EIR and to comments received on the Bradley West Project Draft EIR and represent an alternative to the proposed use of the Northwest Construction Staging/Parking Area, the East Contractor Employee Parking Area, or the Southeast Construction Staging/Parking Area as the primary parking area for project construction workers. Under Alternative 4, the West Construction Staging Area would be expected to fully meet typical construction worker parking demands and would not require the use of any other contractor employee parking areas. However, in the event additional parking is needed, the excess demand would be accommodated at the East Contractor Employee Parking Area located to the north of LAX Public Parking Lot B, or if unavailable, by the Southeast Construction Staging/Parking Area at Imperial Highway and Aviation Boulevard. (Please see Topical Response TR-BWP-ST-1; see also Bradley West Project Draft EIR Figures 4.3-4 and 2-8.)

BWP-PH00006 Cope, Danna None Provided 6/6/2009

BWP-PH00006-1

Comment: Danna Cope, member of LAX Area Advisory Committee and Board Member of ARSAC but today I am speaking for myself. I'm concerned about when runways get closed for any of the construction work and that there in the past there has not been community notification that runways would be closed. We need to have very clear publication and communication with all the community areas that runways will be closed.

Response: The comment is noted. No runway closures are anticipated to be required for construction of the Bradley West Project.

BWP-PH00006-2

Comment: I also I'm with Nan on the crowding at the terminals. These aircraft I believe the Quantas people told me that the A380 is certified to fly into the Untied States with 754 people. So granted none of them are doing that right now, they are not contemplating that, but that does not mean that they don't re-change everything and start flying at least 700 people in. I am not sure that this terminal that you are building will handle that.

Response: Please see Responses to Comments BWP-PC00002-2 and BWP-PC00008-2 regarding the number of passengers per aircraft and the sizing of the proposed facilities to accommodate A380 and other new generation aircraft.

BWP-PH00006-3

Comment: I also you know I think we are building an awful lot just for that one aircraft and it does seem kind of ridiculous to spend this kind of money. You do need to do something with Tom Bradley, we all agree with that. I am just not terribly sure this is the greatest thing and the other main comment I have is that you need to show on your maps where the crossfield taxiway is. That needs to be a part of this EIR to show that that is underway and so that we can see where the conflicts might come in. OK? Thank you.

Response: The comment is noted. Please see Response to Comment BWP-PC00009-4, which includes a figure that shows the location of the Crossfield Taxiway Project in relation to the proposed Bradley West Project. No further response is required because the comment does not raise any new significant environmental issues or address the adequacy of the environmental analysis included in the Bradley West Project Draft EIR (Public Resources Code Section 21091(d); CEQA Guidelines Section 15204(a)).

3. CORRECTIONS AND ADDITIONS TO THE BRADLEY WEST PROJECT DRAFT EIR

3.1 Introduction

As a result of clarifications to, and comments received on, the Draft Environmental Impact Report (Draft EIR) for the Bradley West Project, the following revisions are hereby made to the text of the Bradley West Project Draft EIR. Changes in text are signified by strikeouts where text is removed and by italics where text is added, unless otherwise noted. These changes do not add significant new information to the EIR, nor do they disclose or suggest new or more severe significant environmental impacts of the Bradley West Project.

3.2 Corrections and Additions to the Draft EIR Text

Chapter 1, Introduction and Executive Summary

1. The fifth page of Table 1-3 on page 1-33 of the Draft EIR has been revised. Please see the following table revisions.

Chapter 2, Project Description

1. Figure 2-7 on page 2-35 of the Draft EIR has been revised. Please see the following revised figure.
2. Footnote 19 on page 2-44 of the Draft EIR is hereby revised as follows:

> [19] Ricondo & Associates, LAX Planning Forecast Documentation, ~~March~~ *May* 2009.

3. Footnote 20 on page 2-47 of the Draft EIR is hereby revised as follows:

> [20] Ricondo & Associates, LAX ~~Planning Forecast Documentation~~ *TBIT Reconfiguration Project Draft EIR 2008-2013 Design Day Flight Schedule Documentation*, March 2009.

Chapter 3, Overview of Project Setting

1. The first paragraph under the heading "3.3.3 LAX Development Projects Independent of the Master Plan" on page 3-5 of the Draft EIR is hereby revised as follows:

> It is anticipated that a number of other, stand-alone construction activities at LAX that were not part of the LAX Master Plan would likely be underway concurrent with the construction of the Bradley West Project, including both LAWA and tenant projects. ~~These projects include:~~ *For purposes of this EIR, these projects were assumed to include:*[22a]
>
> [22a] *The LAX development projects listed in this section include a number of projects identified on LAWA's draft Capital Improvements Program (CIP) in late 2008. These projects were included in various technical analyses of cumulative impacts for the Bradley West Project, in particular, the modeling of cumulative construction traffic impacts, cumulative air quality impacts, cumulative global climate change impacts, and cumulative construction-related human health risk impacts. In early 2009, the LAWA Board of Airport Commissioners approved only some of the CIP projects for implementation in Fiscal Year 2009-2010. As such, construction of some of the LAX development projects assumed in the cumulative impacts modeling may not occur*

Table 1-3

Summary of Other Environmental Impacts Related to the Bradley West Project for Which No, or Minimal, Additional Analysis is Required Beyond that Provided in the LAX Master Plan Final EIR

Impact by Discipline	Master Plan Commitments	Master Plan Mitigation Measures	New Mitigation Measures	Level of Significance After Mitigation
Wetlands: The Bradley West Project site is fully developed, with no identified wetlands nearby. The results of recent field surveys conducted in support of a forthcoming jurisdictional delineation for the Bradley West Project indicate that none of the areas surveyed exhibited all three wetland parameters (i.e., hydric soils, wetlands hydrology, and hydrophytic vegetation) and there are no waters of the U.S. subject to USACOE jurisdiction. Subject to concurrence by the USACOE, no areas within the Bradley West Project site, including construction staging and parking areas, are considered to be jurisdictional wetlands or waters of the U.S. If USACOE finds that wetlands or waters of the U.S. are present on-site, these impacts would be the same as those previously identified under the LAX Master Plan and for which a Jurisdictional Determination has already been issued. Therefore, the Bradley West Project would not result in any new impacts.	None applicable.	~~None applicable.~~ *MM-ET-1. Riverside Fairy Shrimp Habitat Restoration.*	~~MM-ET-1. Riverside Fairy Shrimp Habitat Restoration.~~ *None required.*	Less than significant with mitigation.
Energy Supply and Natural Resources: Adequate energy and aggregate supplies would be available for construction of the Bradley West Project. It is anticipated that operation of the Bradley West Project would result in a net increase in natural gas and electricity demands.	E-1. Energy Conservation and Efficiency Program E-2. Coordination with Utility Providers PU-1. Develop a Utility Relocation Program SW-2. Requirements for the Use of Recycled Materials During Construction SW-3. Requirements for the Recycling of Construction and Demolition Waste	None applicable.	None required.	Less than significant.

	To Be Removed	To Be Relocated	New Site
American Airlines (Former TWA) Hangar		6	16
American Airlines Low Bay Hangar		7	17
American Eagle Commuter Terminal		8	18
AOA Access Post #5		9	19
LAFD Station #80/ARFF	1		
ASIG GSE Storage Area		10	20
Fuel Vault	2		
Gasoline Fuel Station	3		

	To Be Removed	To Be Relocated	New Site
GSE Apron	4		
Sky Chefs Flight Kitchen		11	21
Menzies GSE Maintenance		12	22
Natural Gas Fuel Station	5		
Vehicle Parking		13	23
Water Deluge Tanks		14	24
RON Aircraft Parking		15	25

0 1,000 ft.
Scale

north

Source: LAX Development Program Team, 2009.

LAX Bradley West Project Draft EIR

Summary of Existing Facilities to be Removed/Relocated

Figure
2-7

concurrently with construction of the Bradley West Project. Such projects include construction of: Phase III of the AOA Perimeter Fence Enhancements; Concessions Upgrades in the CTA; Passenger Boarding Bridge Replacements at Terminals 1, 3, 6, and Remote Gates; Baggage Claim Device Replacement in Terminal 3; Miscellaneous improvements within the CTA, such as sewer line replacements in Terminals 1 and 6, CTA seismic retrofits, and CTA joint repair, roadway improvements, and security barriers; Bus Wash Rack Facility; and K-9 Training Facility. Given the relatively small and short-term nature of these types of projects, the modeling analyses that included such projects are still representative of the cumulative impacts associated with the proposed project.

2. The last page of Table 3-1 on page 3-21 of the Draft EIR has been revised. Please see the following revised table.

Chapter 4, Setting, Environmental Impacts, and Mitigation Measures

1. Table 4.1-2 on page 4-17 of the Draft EIR is hereby revised as follows:

Table 4.1-2

CTA Average Daily Traffic Volumes

Monthly Traffic	2000	2001	2002	2003	2004	2005	2006	2007	2008
January	82,136	90,683	65,135	66,039	61,775	69,554	67,727	66,999	67,483
February	79,791	87,509	61,148	60,808	59,802	60,930	63,715	65,339	64,924
March	86,627	93,186	66,794	59,921	64,431	63,748	69,034	68,380	69,819
April	92,863	96,566	68,164	60,434	68,164	64,771	69,230	70,268	69,184
May	98,052	96,341	70,867	64,306	68,155	68,982	70,303	71,599	72,022
June	102,392	101,585	72,282	65,903	74,650	75,699	72,647	73,669	75,118
July	106,445	**105,842**	75,433	74,047	**78,674**	75,635	75,895	78,342	75,640
August	**108,871**	103,308	**79,427**	**76,556**	77,986	**79,046**	**78,236**	**82,193**	**76,434**
September	95,917	59,987	66,630	60,762	66,276	68,151	67,171	68,316	65,227
October	92,169	42,370	65,166	59,904	66,395	66,607	66,981	68,152	64,260
November	96,308	56,579	62,264	59,944	65,525	68,200	70,326	72,098	64,128
December	94,551	60,649	71,845	68,666	73,107	70,700	71,978	71,900	70,972
~~**Total Annual**~~	~~**1,136,122**~~	~~**994,605**~~	~~**825,155**~~	~~**777,290**~~	~~**824,940**~~	~~**832,023**~~	~~**843,243**~~	~~**857,255**~~	~~**835,211**~~
Average Daily Traffic [1]	~~94,692~~ *94,775*	~~82,884~~ *82,892*	~~68,763~~ *68,841*	~~64,774~~ *64,840*	~~68,901~~ *68,948*	~~69,335~~ *69,406*	~~70,270~~ *70,329*	~~71,438~~ *71,492*	~~69,601~~ *69,669*
% Annual Change	--	-12.5%	-17.0%	-5.8%	~~6.4%~~ *6.3%*	~~0.6%~~ *0.7%*	1.3%	1.7%	-2.6%
Million Annual Passengers	67.3	61.6	56.2	55.0	60.7	61.5	61.0	62.4	59.8
% Annual Change	--	-8.5%	-8.8%	-2.1%	10.4%	1.3%	-0.8%	1.5%	-4.2%

[1] *Estimates for average daily traffic are calculated by weighting the monthly average daily traffic volumes by the number of days in the month. The month of February has 29 days in 2000, 2004, and 2008.*

Source: City of Los Angeles, Los Angeles World Airports, Ground Transportation Report, Ground Transportation Planning and Design, February 26, 2009. *Ricondo & Associates, Inc. June 2009.*

2. Intersection #162 on page 4-101 of the Draft EIR is hereby revised as follows:

   - 162. Sepulveda Boulevard and ~~Rosecrans Avenue~~ *Manhattan Beach Boulevard*

3. The following bullet is hereby added after Intersection #147 under LADOT's Adaptive Traffic Control System (ATCS) exception list on page 4-102 of the Draft EIR:

   - *162. Sepulveda Boulevard and Manhattan Beach Boulevard*

Table 3-1

List of Other Related Projects

No.	Project Name	Address	Description	City[1,2]	Comments
141	Bank and Retail	1129 N. Sepulveda Boulevard	4,000 sq. ft. bank and 2,000 sq. ft. retail; demolition of existing gas station	MB	Fenced structure per field visit of 1/7/2009
142	Mixed-Use Project (former Good Stuff restaurant)	1300 Highland Avenue	15,000 sq. ft. commercial/office/condominium	MB	Under construction per field visit of 1/7/2009
143	Medical Plaza	222 Sepulveda Blvd (NE Corner of Sepulveda Blvd and 2nd St)	12,000 sq. ft. medical office building and 1,000 sq. ft. retail. (Existing 5,000 sq. ft. auto repair shop to be removed)	MB	Existing limousine detailing business per field visit of 1/7/2009
144	Retail	1727 Artesia Boulevard	5,800 sq. ft. retail	MB	Construction nearing completion per field visit of 1/7/2009
145	Retail	1700 Rosecrans Avenue	10,000 sq. ft. retail (from warehouse)	MB	Construction complete per field visit of 1/7/2009
146	Rite Aid Store	1100 Manhattan Beach Blvd	13,000 sq. ft. retail (Existing 8,600 sq. ft. gas station to be removed)	MB	Fenced empty lot per field visit of 1/7/2009
147	Walgreens	2400 Sepulveda Boulevard	15,000 sq. ft. retail (demolition of vacant Albertsons store)	MB	Not started per field visit of 1/7/2009
148	*Resurfacing of Imperial Boulevard*		*Resurface Imperial Boulevard from Pershing Drive to west of the I-105 terminus*	*LA*	*In 2009-2010 fiscal year street resurfacing program, but not currently scheduled*

Table 3-1

List of Other Related Projects

No.	Project Name	Address	Description	City[1,2]	Comments
149	*Imperial Highway Sunken Median Project*		*Retrofit Imperial Highway west of Sepulveda Boulevard to Pershing Drive by installing a sunken median with a vegetated swale that will act as an infiltration bioretention*	*LA*	*Construction underway*

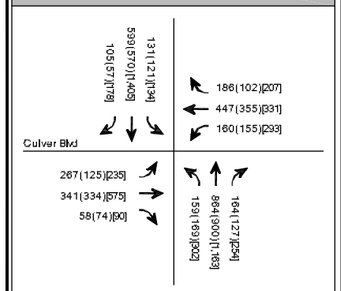
[1] CC = Culver City; CO = County of Los Angeles; ES = El Segundo; HA = Hawthorne; IN = Inglewood; LA = City of Los Angeles; MB = Manhattan Beach

[2] Projects in Culver City from "Culver City Related Projects List" dated November 6, 2008 and sent by Ms. Diana Chang, Sr. Management Analyst/Transportation Planner, City of Culver City staff to LAWA. Projects in the City of Los Angeles updated via e-mail from Mr. Eddie Guerrero, Transportation Engineer, LADOT on March 25, 2009. Projects in County of Los Angeles from "Related Projects List," dated April 3, 2008, developed and prepared by Suen Fei Lau, Associate Civil Engineer, Los Angeles County Department of Public Works. Updates to projects in El Segundo provided by Maryam Jonas, El Segundo Public Works Department, on January 21, 2009 via e-mail to LAWA staff. Projects in City of Hawthorne were based on the the City's website: http://www.cityofhawthorne.com/depts/planningcommdev/pending_applications/default.asp dated January 15, 2009 and updated via an e-mail from Mr. Christopher Palmer, Planning Assistant, City of Hawthorne, on January 20, 2009 to LAWA staff. Projects in Inglewood from "Related Projects" list dated 3/27/08. Projects in Manhattan Beach sent from Manhattan Beach City staff to LAWA in May 2008. *Imperial Highway Sunken Median Project from "Integrated Regional Water Management Plan for the Santa Monica Bay Watershed, Draft Plan Version 1," March 2005. Resurfacing of Imperial Boulevard Project from a May 14, 2009 e-mail from Tim Conger, Transportation Engineer, Geometric Design Section, LADOT to Patrick Tomcheck, Senior Transportation Engineer, LAWA.*

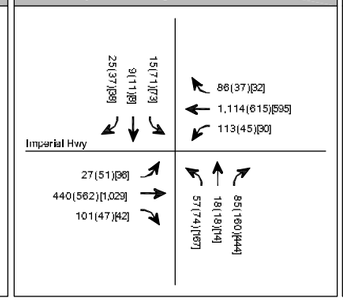
Source: Fehr & Peers, 2009.

4. Figures 4.2-3b on page 4-105, 4.2-3c on page 4-107, and 4.2-3d on page 4-109 of the Draft EIR have been revised. Please see the following revised figures.
5. The last page of Table 4.2-5 on page 4-134 of the Draft EIR has been revised. Please see the following revised table.

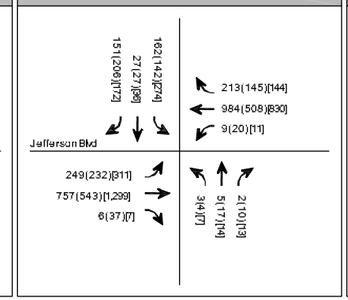
43. Overland Ave & Culver Blvd



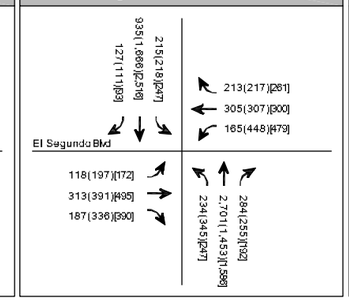
47. Douglas St & Imperial Hwy



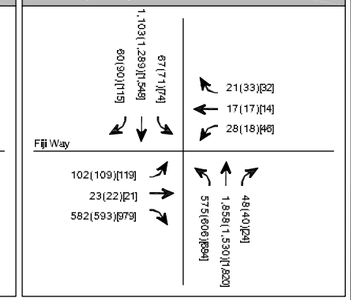
50. Duquesne Ave & Jefferson Blvd



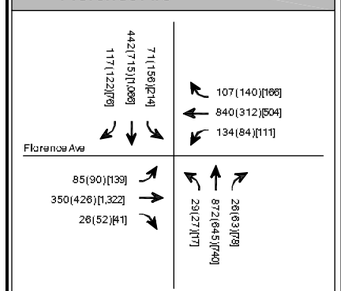
55. Sepulveda Blvd & El Segundo Blvd



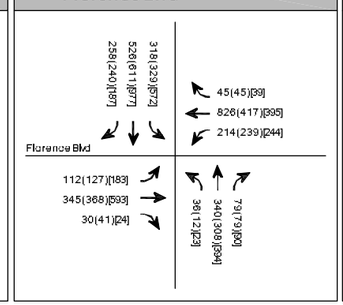
56. Lincoln Blvd & Fiji Way



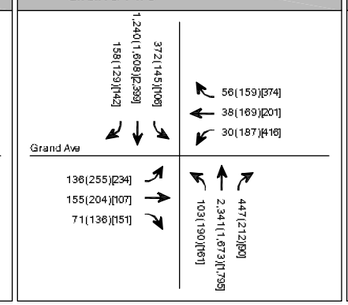
57. La Brea Ave & Florence Ave



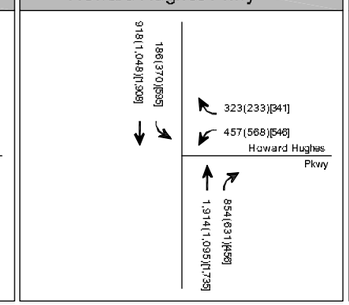
58. La Cienega Blvd & Florence Blvd



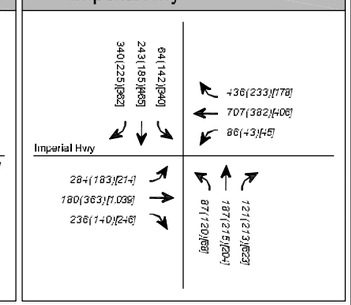
60. Sepulveda Blvd & Grand Ave



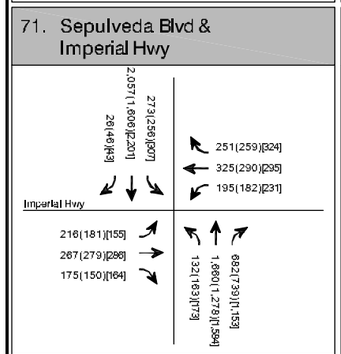
65. Sepulveda Blvd & Howard Hughes Pkwy



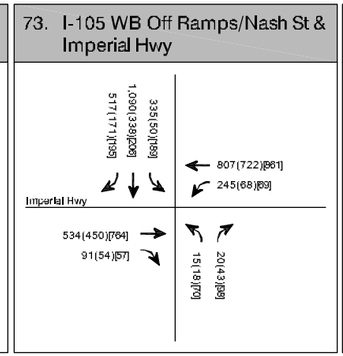
67. La Cienega Blvd & Imperial Hwy



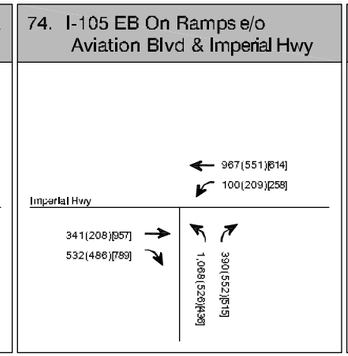
71. Sepulveda Blvd & Imperial Hwy



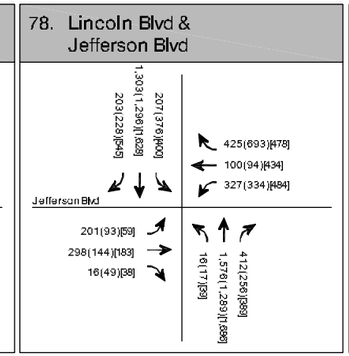
73. I-105 WB Off Ramps/Nash St & Imperial Hwy



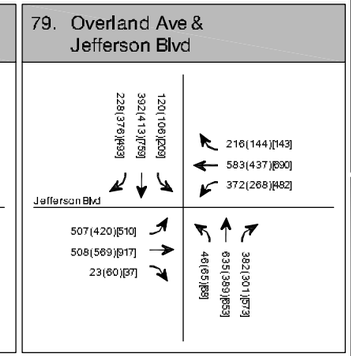
74. I-105 EB On Ramps e/o Aviation Blvd & Imperial Hwy



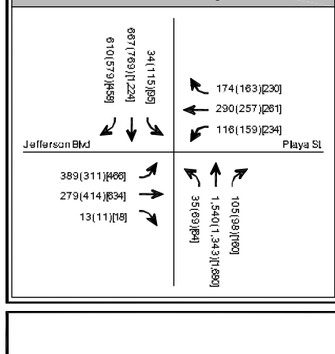
78. Lincoln Blvd & Jefferson Blvd



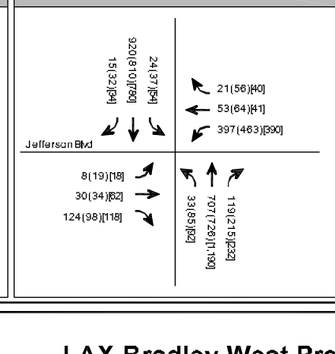
79. Overland Ave & Jefferson Blvd



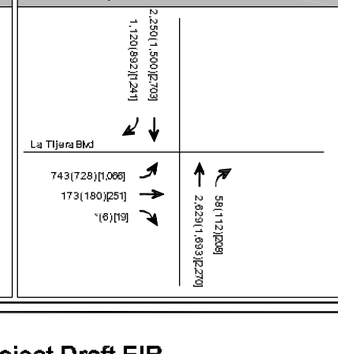
81. Sepulveda Blvd & Jefferson Blvd/Playa St



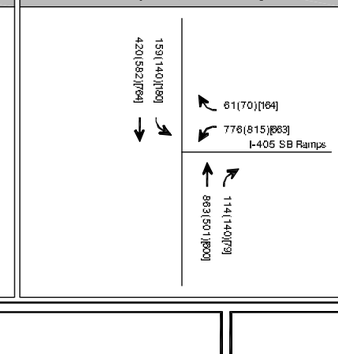
82. Slauson Ave & Jefferson Blvd



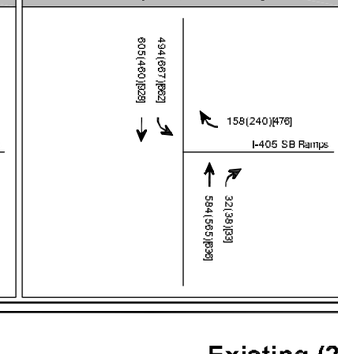
88. La Cienega Blvd & La Tijera Blvd

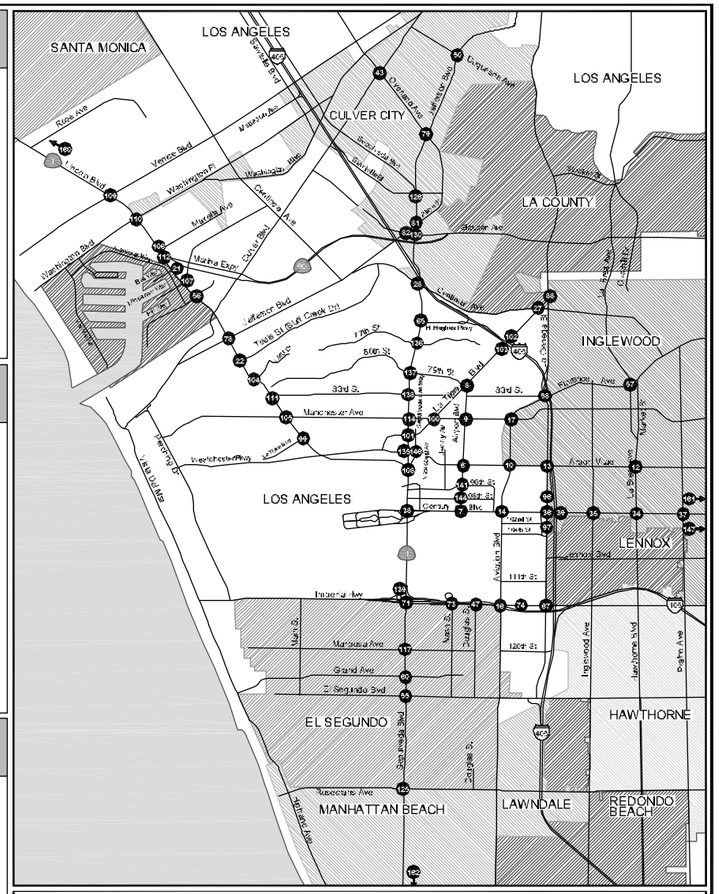


96. La Cienega Blvd & I-405 SB Ramps N/O Century



97. La Cienega Blvd & I-405 SB Ramps S/O Century





Legend

- Analyzed Intersection
- X(X) AM(Midday)[PM] Peak Hour Traffic Volumes
- Turn Movement

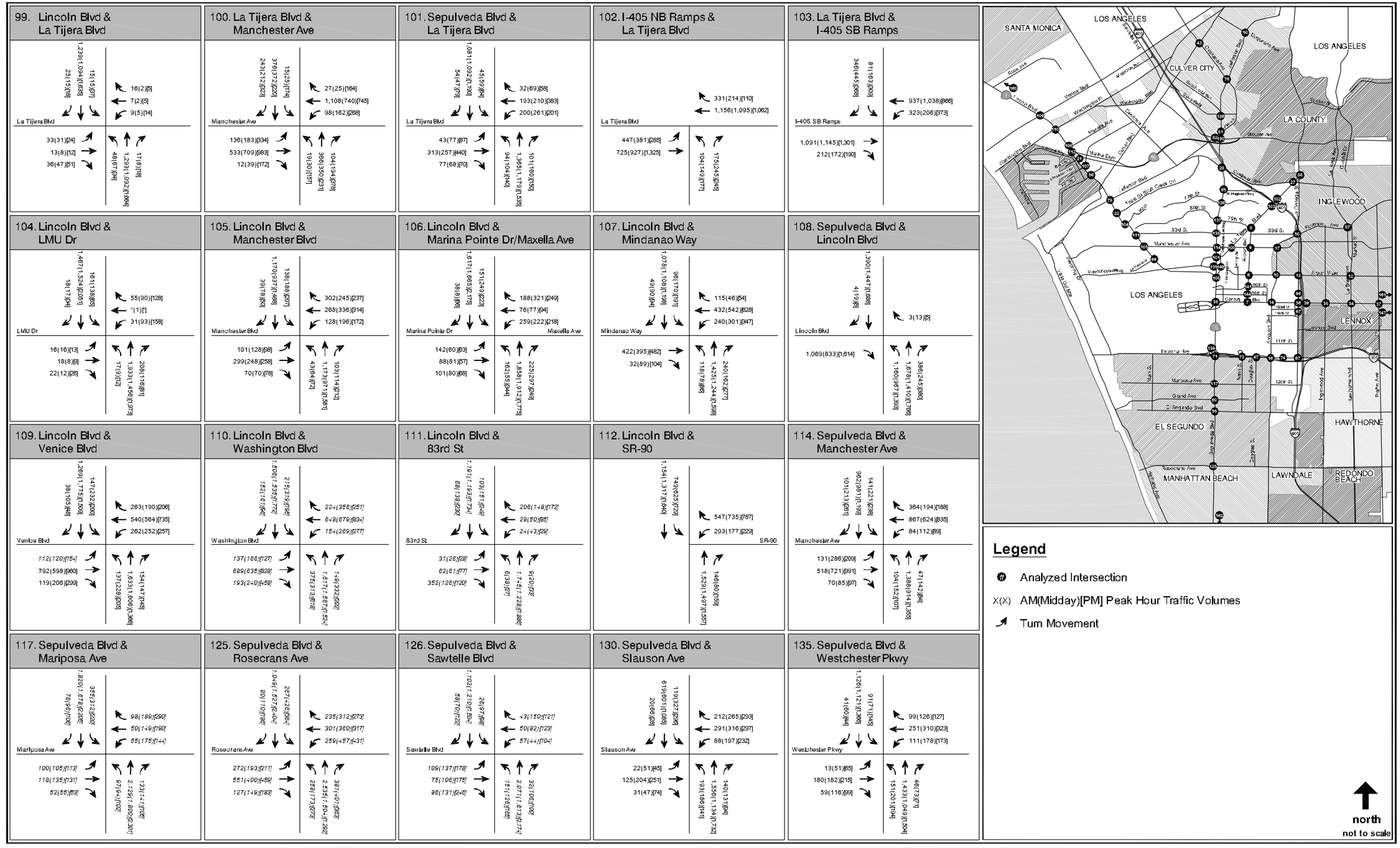
north

not to scale

LAX Bradley West Project Draft EIR

Existing (2008) Traffic Volumes

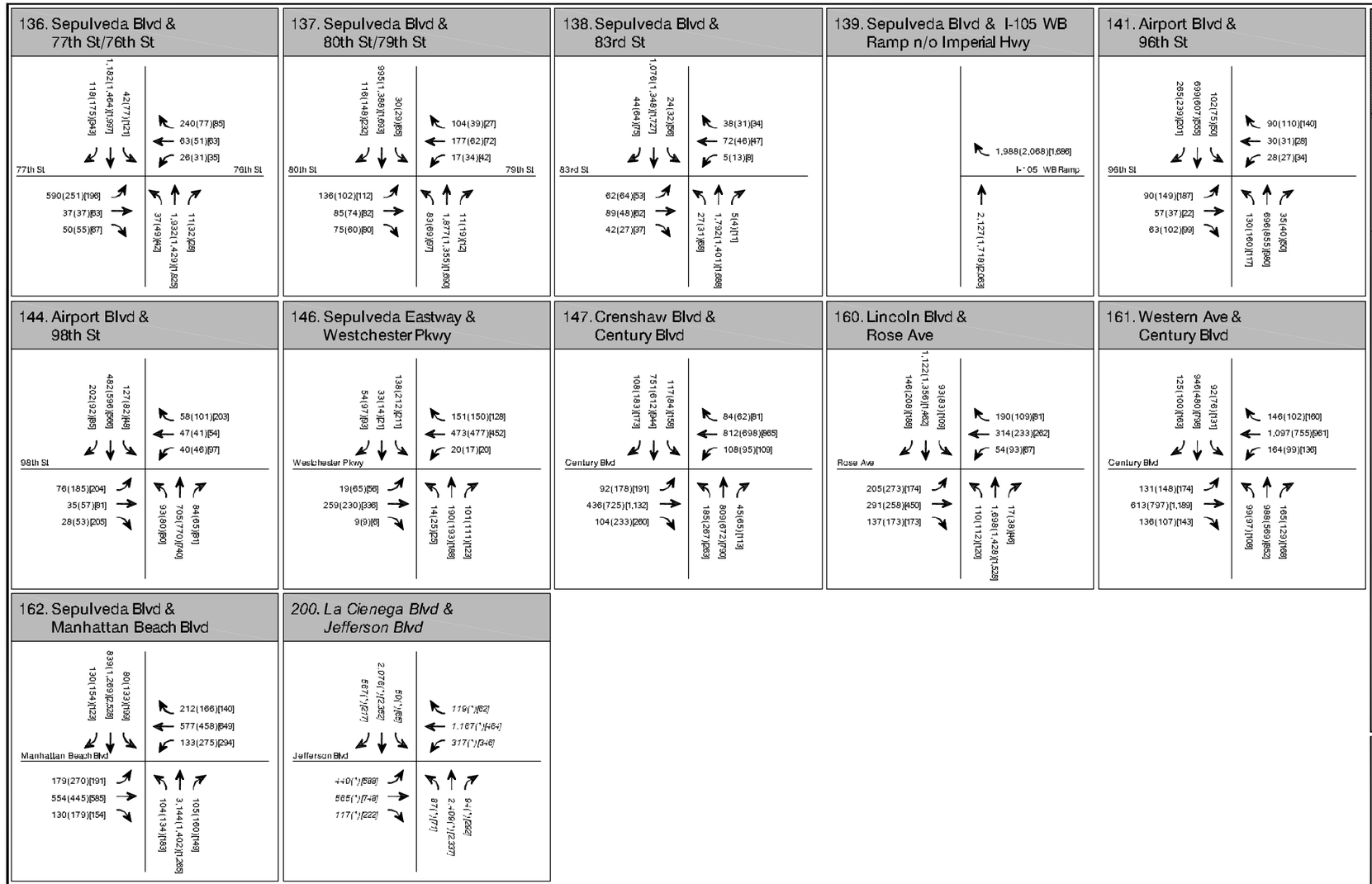
Figure **4.2-3b**



LAX Bradley West Project Draft EIR

Existing (2008) Traffic Volumes

Figure **4.2-3c**



LAX Bradley West Project Draft EIR	Existing (2008) Traffic Volumes	Figure 4.2-3d

Table 4.2-5

Planned Development Projects List

No.	Project Name	Address	Description	City[1,2]	Net AM Trips	Net PM Trips	Comments
144	Retail	1727 Artesia Boulevard	5,800 sq. ft. retail	MB			Construction nearing completion per field visit of 1/7/2009
145	Retail	1700 Rosecrans Avenue	10,000 sq. ft. retail (from warehouse)	MB			Construction complete per field visit of 1/7/2009
146	Rite Aid Store	1100 Manhattan Beach Blvd	13,000 sq. ft. retail (Existing 8,600 sq. ft. gas station to be removed)	MB			Fenced empty lot per field visit of 1/7/2009
147	Walgreens	2400 Sepulveda Boulevard	15,000 sq. ft. retail (demolition of vacant Albertsons store)	MB			Not started per field visit of 1/7/2009
148	*Resurfacing of Imperial Boulevard*		*Resurface Imperial Boulevard from Pershing Drive to west of the I-105 terminus*	*LA*			*In 2009-2010 fiscal year street resurfacing program, but not currently scheduled*
149	*Imperial Highway Sunken Median Project*		*Retrofit Imperial Highway west of Sepulveda Boulevard to Pershing Drive by installing a sunken median with a vegetated swale that will act as an infiltration bioretention*	*LA*			*Construction underway*

[1] CC = Culver City; CO = County of Los Angeles; ES = El Segundo; HA = Hawthorne; IN = Inglewood; LA = City of Los Angeles; MB = Manhattan Beach

[2] Projects in Culver City from "Culver City Related Projects List" dated November 6, 2008 and sent by Ms. Diana Chang, Sr. Management Analyst/Transportation Planner, City of Culver City staff to LAWA. Projects in the City of Los Angeles updated via e-mail from Mr. Eddie Guerrero, Transportation Engineer, LADOT on March 25, 2009. Projects in County of Los Angeles from "Related Projects List," dated April 3, 2008, developed and prepared by Suen Fei Lau, Associate Civil Engineer, Los Angeles County Department of Public Works. Updates to projects in El Segundo provided by Maryam Jonas, El Segundo Public Works Department, on January 21, 2009 via e-mail to LAWA staff. Projects in City of Hawthorne were based on the the City's website: http://www.cityofhawthorne.com/depts/planningcommdev/pending_applications/default.asp dated January 15, 2009 and updated via an e-mail from Mr. Christopher Palmer, Planning Assistant, City of Hawthorne, on January 20, 2009 to LAWA staff. Projects in Inglewood from "Related Projects" list dated 3/27/08. Projects in Manhattan Beach sent from Manhattan Beach City staff to LAWA in May 2008. *Imperial Highway Sunken Median Project from "Integrated Regional Water Management Plan for the Santa Monica Bay Watershed, Draft Plan Version 1," March 2005. Resurfacing of Imperial Boulevard Project from a May 14, 2009 e-mail from Tim Conger, Transportation Engineer, Geometric Design Section, LADOT to Patrick Tomcheck, Senior Transportation Engineer, LAWA.*

Source: Fehr & Peers, 2009.

6. Table 4.2-6 on page 4-135 of the Draft EIR has been revised. Please see the following revised table.
7. Figures 4.2-4b on page 4-139, 4.2-4c on page 4-141, and 4.2-4d on page 4-143 of the Draft EIR have been revised. Please see the following revised figures.
8. Figures 4.2-5b on page 4-147, 4.2-5c on page 4-149, and 4.2-5d on page 4-151 of the Draft EIR have been revised. Please see the following revised figures.
9. The third sentence of the first paragraph on page 4-154 of the Draft EIR is hereby revised as follows:

   As indicated in the table, *one* ~~two~~ of the 14 arterial monitoring stations would be significantly impacted~~;~~*:* Intersection 93 - La Cienega Boulevard and Stocker Avenue ~~and Intersections 125 - Rosecrans Avenue and Sepulveda Boulevard~~.

Table 4.2-6

Future (2013) With Project Conditions Measured Against Future-Adjusted (2013) Without Project Conditions

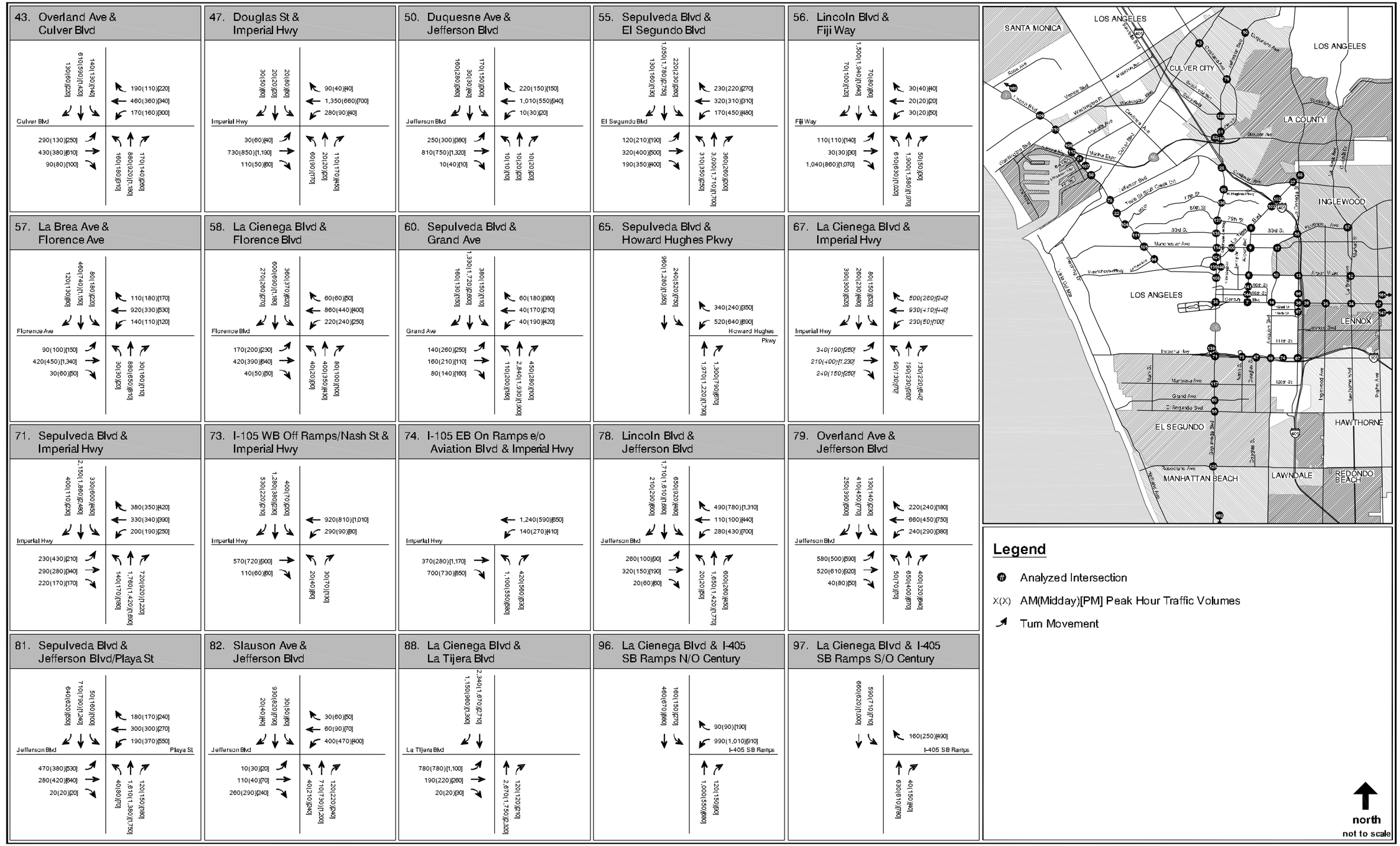
Int #	Intersection	Jurisdiction	ATSAC	AT CS	Future-Adjusted (2013) Without Project Conditions AM		Future (2013) With Project Conditions AM		Significant Impact ?		Future-Adjusted (2013) Without Project Conditions MD		Future (2013) With Project Conditions MD		Significant Impact ?		Future-Adjusted (2013) Without Project Conditions PM		Future (2013) With Project Conditions PM		Significant Impact?	
					V/C	LOS	V/C	LOS	Delta	Impact?	V/C	LOS	V/C	LOS	Delta	Impact?	V/C	LOS	V/C	LOS	Delta	Impact?
6	Airport Bl and Arbor Vitae St / Westchester Pky	LA	X	X	0.653	B	0.804	D	0.151	YES	0.569	A	0.620	B	0.051	NO	0.871	D	0.929	E	0.058	YES
7	Airport Blvd and Century Blvd	LA	X	X	0.718	C	0.864	D	0.145	YES	0.665	B	0.823	D	0.158	YES	0.768	C	0.865	D	0.097	YES
8	Airport Blvd (N/S) and La Tijera Blvd (E/W)	LA	X	X	0.652	B	0.690	B	0.038	NO	0.442	A	0.481	A	0.039	NO	0.614	B	0.639	B	0.025	NO
9	Airport Blvd and Manchester Ave	LA	X	X	0.718	C	0.755	C	0.036	NO	0.704	C	0.718	C	0.015	NO	1.125	F	1.144	F	0.018	YES
10	Arbor Vitae St and Aviation Blvd	Inglewood / LA	X	X	0.707	C	0.747	C	0.040	NO	0.477	A	0.510	A	0.033	NO	0.817	D	0.857	D	0.040	YES
12	Arbor Vitae St and La Brea Ave	Inglewood			0.497	A	0.503	A	0.006	NO	0.535	A	0.541	A	0.006	NO	0.747	C	0.753	C	0.006	NO
13	Arbor Vitae St and La Cienega Blvd	Inglewood	X	X	0.688	B	0.729	C	0.041	NO	0.550	A	0.576	A	0.026	NO	0.769	C	0.826	D	0.057	NO
14	Aviation Blvd and Century Blvd	LA	X	X	0.934	E	1.017	F	0.083	YES	0.665	B	0.726	C	0.061	YES	0.789	C	0.843	D	0.053	YES
16	Aviation Blvd and Imperial Highway	LA	X	X	0.797	C	0.816	D	0.018	NO	0.464	A	0.489	A	0.025	NO	0.860	D	0.886	D	0.026	YES
17	Aviation Bl / Florence Ave and Manchester Bl	Inglewood	X	X	0.779	C	0.796	C	0.017	NO	0.632	B	0.663	B	0.031	NO	0.703	C	0.716	C	0.013	NO
21	Bali Way and Lincoln Blvd	Caltrans / LA / LA County	X	X	0.505	A	0.515	A	0.009	NO	0.523	A	0.533	A	0.009	NO	0.771	C	0.787	C	0.016	NO
22	Bluff Creek Dr and Lincoln Blvd	Caltrans / LA	X	X	0.447	A	0.459	A	0.012	NO	0.414	A	0.425	A	0.011	NO	0.506	A	0.515	A	0.009	NO
27	Centinela Ave (E/W) and La Tijera Blvd (N/S)	LA	X	X	0.671	B	0.676	B	0.005	NO	0.675	B	0.704	C	0.029	NO	0.637	B	0.654	B	0.017	NO
28	Centinela Ave and Sepulveda Blvd	Culver City	X	X	0.797	C	0.803	D	0.006	NO	0.627	B	0.631	B	0.004	NO	0.813	D	0.821	D	0.008	NO
34	Century Blvd and Hawthorne Blvd / La Brea Ave	Inglewood			0.651	B	0.681	B	0.030	NO	0.651	B	0.671	B	0.020	NO	0.861	D	0.896	D	0.035	NO
35	Century Blvd and Inglewood Ave	Inglewood			0.683	B	0.704	C	0.021	NO	0.563	A	0.573	A	0.010	NO	0.811	D	0.834	D	0.023	NO
36	Century Blvd and La Cienega Blvd	Inglewood / LA / County of LA	X	X	0.843	D	0.896	D	0.053	YES	0.725	C	0.784	C	0.058	YES	1.069	F	1.127	F	0.058	YES
37	Century Blvd and Prairie Ave	Inglewood			0.729	C	0.748	C	0.019	NO	0.734	C	0.740	C	0.006	NO	0.925	E	0.954	E	0.029	NO
38	Century Blvd and Sepulveda Blvd	LA / Caltrans	X	X	0.573	A	0.593	A	0.020	NO	0.589	A	0.605	B	0.017	NO	0.697	B	0.720	C	0.023	NO
39	Century Blvd and I-405 NB On/Off Ramps	Caltrans / Inglewood	X	X	0.787	C	0.830	D	0.043	NO	0.568	A	0.603	B	0.035	NO	0.644	B	0.683	B	0.039	NO
43	Culver Blvd and Overland Ave	Culver City	X		0.794	C	0.797	C	0.003	NO	0.634	B	0.640	B	0.006	NO	0.971	E	0.974	E	0.003	NO
47	Douglas St and Imperial Highway	El Segundo / LA	X	X	0.323	A	0.333	A	0.009	NO	0.240	A	0.256	A	0.017	NO	0.412	A	0.422	A	0.010	NO
50	Duquesne Ave and Jefferson Blvd	Culver City	X		0.614	B	0.614	B	0.000	NO	0.497	A	0.497	A	0.000	NO	0.763	C	0.763	C	0.000	NO
55	El Segundo Blvd and Sepulveda Blvd	Caltrans / El Segundo			0.889	D	0.901	E	0.012	NO	0.833	D	0.841	D	0.008	NO	1.007	F	1.017	F	0.010	NO
56	Fiji Way and Lincoln Blvd	Caltrans / LA / LA County	X	X	0.603	B	0.615	B	0.012	NO	0.723	C	0.740	C	0.017	NO	0.835	D	0.846	D	0.011	NO
57	Florence Ave and La Brea Ave	Inglewood			0.800	C	0.803	D	0.003	NO	0.641	B	0.644	B	0.003	NO	0.997	E	1.000	E	0.003	NO
58	Florence Ave and La Cienega Blvd	Inglewood			0.853	D	0.894	D	0.041	NO	0.781	C	0.805	D	0.024	NO	1.088	F	1.107	F	0.019	NO
60	Grand Ave and Sepulveda Blvd	El Segundo			0.889	D	0.897	D	0.008	NO	0.738	C	0.747	C	0.009	NO	0.973	E	0.981	E	0.008	NO
65	Howard Hughes Pkwy and Sepulveda Bl	LA	X	X	0.569	A	0.569	A	0.000	NO	0.569	A	0.569	A	0.000	NO	0.569	A	0.569	A	0.000	NO
67	Imperial Hwy and La Cienega Blvd	LA	X	X	0.441	A	0.456	A	0.015	NO	0.240	A	0.257	A	0.017	NO	0.676	B	0.682	B	0.006	NO
71	Imperial Hwy and Sepulveda Blvd	Caltrans / El Segundo / LA	X	X	0.704	C	0.728	C	0.025	NO	1.040	F	1.067	F	0.027	YES	1.120	F	1.144	F	0.024	YES
73	Imperial Hwy and Nash St / I-105 WB Off-Ramp	El Segundo / Caltrans / LA	X	X	0.654	B	0.661	B	0.007	NO	0.285	A	0.300	A	0.015	NO	0.325	A	0.339	A	0.015	NO
74	Imperial Hwy and I-105 Ramps E/O Aviation Bl	Caltrans / LA	X	X	0.745	C	0.760	C	0.015	NO	0.301	A	0.320	A	0.018	NO	0.594	A	0.637	B	0.043	NO
78	Jefferson Blvd and Lincoln Blvd	Caltrans / LA	X	X	0.715	C	0.714	C	-0.001	NO	0.734	C	0.749	C	0.015	NO	0.805	D	0.812	D	0.007	NO
79	Jefferson Blvd (E/W) and Overland Ave (N/S)	Culver City	X		0.744	C	0.747	C	0.003	NO	0.576	A	0.579	A	0.003	NO	0.883	D	0.890	D	0.007	NO
81	Jefferson Blvd / Playa St and Sepulveda Blvd	Culver City	X		0.712	C	0.718	C	0.006	NO	0.726	C	0.732	C	0.006	NO	0.910	E	0.916	E	0.006	NO
82	Jefferson Blvd (E/W) and Slauson Ave (N/S)	Culver City	X		0.559	A	0.559	A	0.000	NO	0.637	B	0.640	B	0.003	NO	0.584	A	0.584	A	0.000	NO
88	La Cienega Blvd (N/S) and La Tijera Blvd (E/W)	Inglewood / LA	X	X	0.705	C	0.713	C	0.007	NO	0.501	A	0.540	A	0.039	NO	0.780	C	0.827	D	0.047	YES
96	La Cienega Bl and I-405 SB Ramps N/O Century	Caltrans / Inglewood / LA	X	X	0.736	C	0.773	C	0.036	NO	0.569	A	0.609	B	0.040	NO	0.693	B	0.744	C	0.051	YES
97	La Cienega Bl and I-405 SB Ramps S/O Century	Caltrans / Inglewood / LA	X	X	0.353	A	0.380	A	0.027	NO	0.430	A	0.461	A	0.031	NO	0.448	A	0.483	A	0.034	NO
99	La Tijera Blvd and Lincoln Blvd	Caltrans / LA	X	X	0.302	A	0.316	A	0.014	NO	0.228	A	0.247	A	0.019	NO	0.377	A	0.391	A	0.014	NO
100	La Tijera Blvd (N/S) and Manchester Ave (E/W)	LA	X	X	0.704	C	0.733	C	0.029	NO	0.547	A	0.573	A	0.025	NO	0.824	D	0.838	D	0.015	NO
101	La Tijera Blvd and Sepulveda Blvd	LA	X	X	0.753	C	0.838	D	0.085	YES	0.656	B	0.780	C	0.124	YES	0.771	C	0.876	D	0.105	YES
102	La Tijera Blvd and I-405 NB Ramps	Caltrans / LA	X	X	0.531	A	0.560	A	0.029	NO	0.414	A	0.435	A	0.021	NO	0.413	A	0.433	A	0.020	NO
103	La Tijera Blvd and I-405 SB Ramps	Caltrans / LA	X	X	0.463	A	0.480	A	0.018	NO	0.429	A	0.463	A	0.034	NO	0.631	B	0.664	B	0.033	NO
104	Lincoln Blvd and LMU Dr	Caltrans / LA	X	X	0.447	A	0.457	A	0.011	NO	0.384	A	0.403	A	0.019	NO	0.572	A	0.586	A	0.014	NO
105	Lincoln Blvd and Manchester Blvd	Caltrans / LA	X	X	0.519	A	0.537	A	0.018	NO	0.425	A	0.438	A	0.013	NO	0.589	A	0.600	A	0.011	NO
106	Lincoln Blvd and Marina Pointe Dr / Maxella Ave	Caltrans / LA	X	X	0.670	B	0.680	B	0.010	NO	0.631	B	0.640	B	0.009	NO	0.642	B	0.651	B	0.009	NO
107	Lincoln Blvd and Mindanao Way	Caltrans / LA	X	X	0.718	C	0.728	C	0.009	NO	0.779	C	0.788	C	0.009	NO	0.864	D	0.875	D	0.010	NO
108	Lincoln Blvd (E/W) and Sepulveda Blvd (N/S)	Caltrans / LA	X	X	0.377	A	0.425	A	0.048	NO	0.345	A	0.402	A	0.057	NO	0.515	A	0.561	A	0.046	NO
109	Lincoln Blvd and Venice Blvd	Caltrans / LA	X	X	0.892	D	0.910	E	0.018	YES	0.923	E	0.939	E	0.015	YES	0.891	D	0.911	E	0.020	YES
110	Lincoln Blvd and Washington Blvd	Caltrans / LA	X	X	0.808	D	0.818	D	0.010	NO	1.199	F	1.224	F	0.025	YES	1.203	F	1.220	F	0.017	YES
111	Lincoln Blvd and 83rd St	Caltrans / LA	X	X	0.689	B	0.700	B	0.011	NO	0.635	B	0.664	B	0.029	NO	0.651	B	0.662	B	0.011	NO

Table 4.2-6

Future (2013) With Project Conditions Measured Against Future-Adjusted (2013) Without Project Conditions

Int #	Intersection	Jurisdiction	ATSAC	AT	CS	Future-Adjusted (2013) Without Project Conditions AM V/C	AM LOS	Future (2013) With Project Conditions AM V/C	AM LOS	Significant Impact ? Delta	Impact?	Future-Adjusted (2013) Without Project Conditions MD V/C	MD LOS	Future (2013) With Project Conditions MD V/C	MD LOS	Significant Impact ? Delta	Impact?	Future-Adjusted (2013) Without Project Conditions PM V/C	PM LOS	Future (2013) With Project Conditions PM V/C	PM LOS	Significant Impact? Delta	Impact?
112	Lincoln Blvd and SR-90	Caltrans / LA County	X	X		0.807	D	0.815	D	0.008	NO	0.735	C	0.743	C	0.008	NO	0.755	C	0.763	C	0.008	NO
114	Manchester Ave and Sepulveda Blvd	LA	X	X		0.750	C	0.802	D	0.052	YES	0.791	C	0.827	D	0.036	YES	0.924	E	0.980	E	0.056	YES
117	Mariposa Ave and Sepulveda Blvd	El Segundo/Caltrans				0.829	D	0.829	D	0.000	NO	0.769	C	0.790	C	0.021	NO	0.844	D	0.858	D	0.014	NO
125	Rosecrans Ave and Sepulveda Blvd	El Segundo / Manhattan Beach / Caltrans				~~1.114~~ *0.956*	~~F~~ *E*	~~1.134~~ *0.972*	~~F~~ *E*	~~0.020~~ *0.016*	YES	~~0.896~~ *0.811*	D	~~0.910~~ *0.822*	~~E~~ *D*	~~0.014~~ *0.011*	~~YES~~ *NO*	1.044	F	1.054	F	0.010	YES
126	Sawtelle Blvd (E/W) and Sepulveda Blvd (N/S)	Culver City	X			0.503	A	0.506	A	0.003	NO	0.597	A	0.599	A	0.002	NO	0.688	B	0.690	B	0.002	NO
130	Sepulveda Blvd and Slauson Avenue	Culver City	X			0.566	A	0.573	A	0.007	NO	0.644	B	0.654	B	0.010	NO	0.738	C	0.756	C	0.018	NO
135	Sepulveda Blvd and Westchester Pkwy	LA	X	X		0.615	B	0.717	C	0.102	YES	0.580	A	0.640	B	0.060	NO	0.831	D	0.882	D	0.051	YES
136	Sepulveda Blvd and 76th/77th Street	LA	X	X		0.835	D	0.882	D	0.047	YES	0.527	A	0.550	A	0.023	NO	0.704	C	0.730	C	0.026	NO
137	Sepulveda Blvd and 79th St/80th St	LA	X	X		0.645	B	0.693	B	0.049	NO	0.422	A	0.447	A	0.025	NO	0.535	A	0.573	A	0.038	NO
138	Sepulveda Blvd and 83rd St	LA	X	X		0.473	A	0.529	A	0.055	NO	0.365	A	0.402	A	0.037	NO	0.535	A	0.573	A	0.038	NO
139	Sepulveda Blvd and I-105 WB Ramp N/O Imperial	Caltrans/LA	X	X		0.911	E	0.972	E	0.061	YES	0.855	D	0.936	E	0.081	YES	0.829	D	0.891	D	0.063	YES
141	96th Street and Airport Blvd	LA	X	X		0.406	A	0.464	A	0.058	NO	0.462	A	0.467	A	0.004	NO	0.605	B	0.624	B	0.018	NO
144	98th Street and Airport Blvd	LA	X	X		0.423	A	0.460	A	0.037	NO	0.530	A	0.577	A	0.047	NO	0.610	B	0.653	B	0.043	NO
146	Sepulveda Eastway and Westchester Pkwy	LA	X	X		0.480	A	0.507	A	0.027	NO	0.533	A	0.597	A	0.063	NO	0.437	A	0.473	A	0.037	NO
147	Century Boulevard and Crenshaw Boulevard	Inglewood				0.659	B	0.676	B	0.017	NO	0.722	C	0.728	C	0.006	NO	0.876	D	0.905	E	0.029	NO
160	Rose Ave and Lincoln Blvd	LA	X	X		0.910	E	0.917	E	0.007	NO	0.787	C	0.797	C	0.010	NO	0.850	D	0.867	D	0.017	NO
161	Century Blvd and Western Ave	LA	X	X		0.773	C	0.789	C	0.017	NO	0.513	A	0.518	A	0.005	NO	0.778	C	0.800	C	0.022	NO
162	Manhattan Beach Blvd and Sepulveda Blvd	Manhattan Beach				1.125	F	1.132	F	0.007	NO	0.819	D	0.826	D	0.007	NO	1.151	F	1.160	F	0.009	NO
	Number of Impacts Per Time Period										**11**						~~**10**~~						**17**
	Number of Intersections with an Impact in any Time Period																***9***						**18**

Source: Fehr & Peers, 2009.



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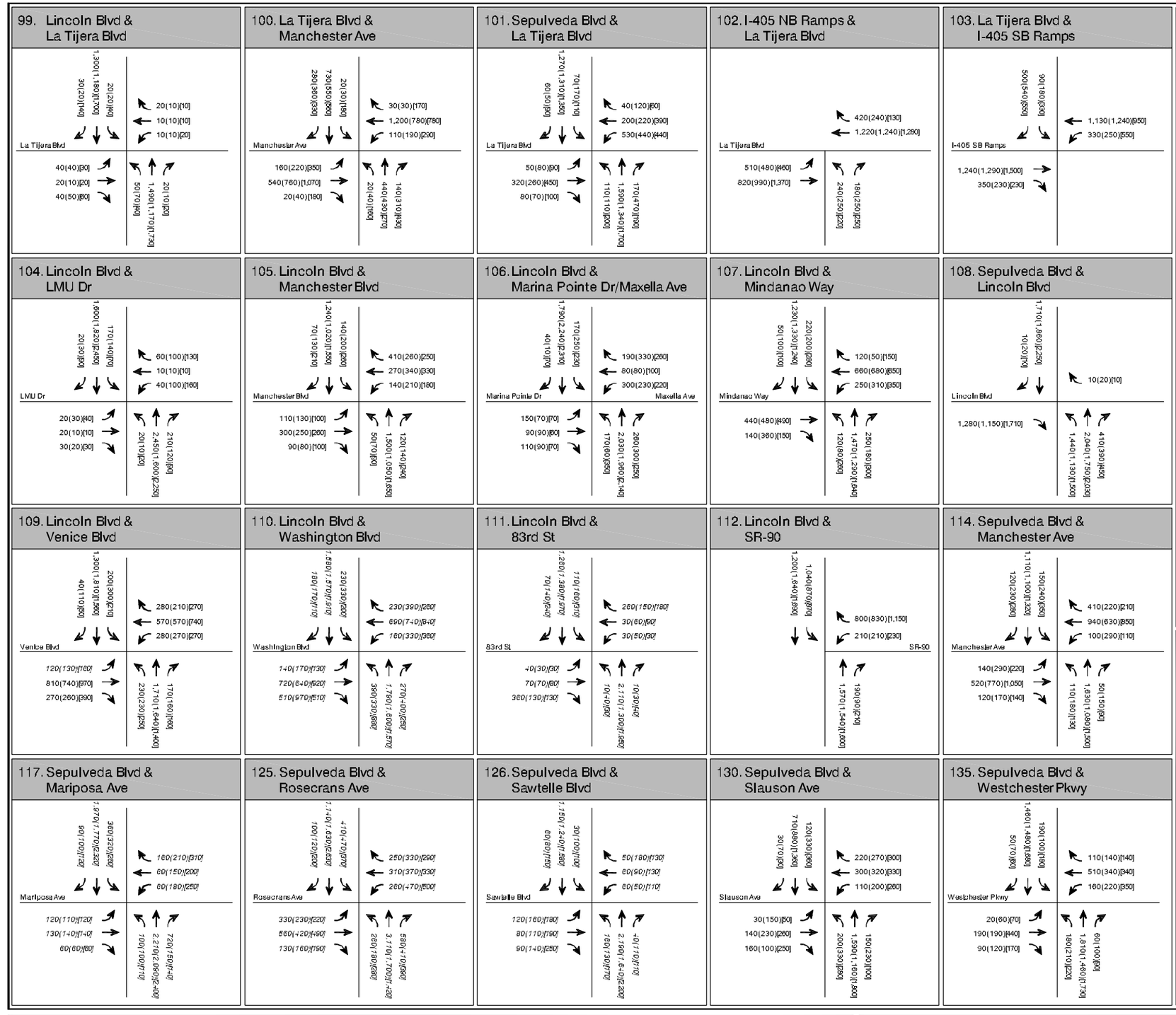
Future (2013) With Project Traffic Volumes

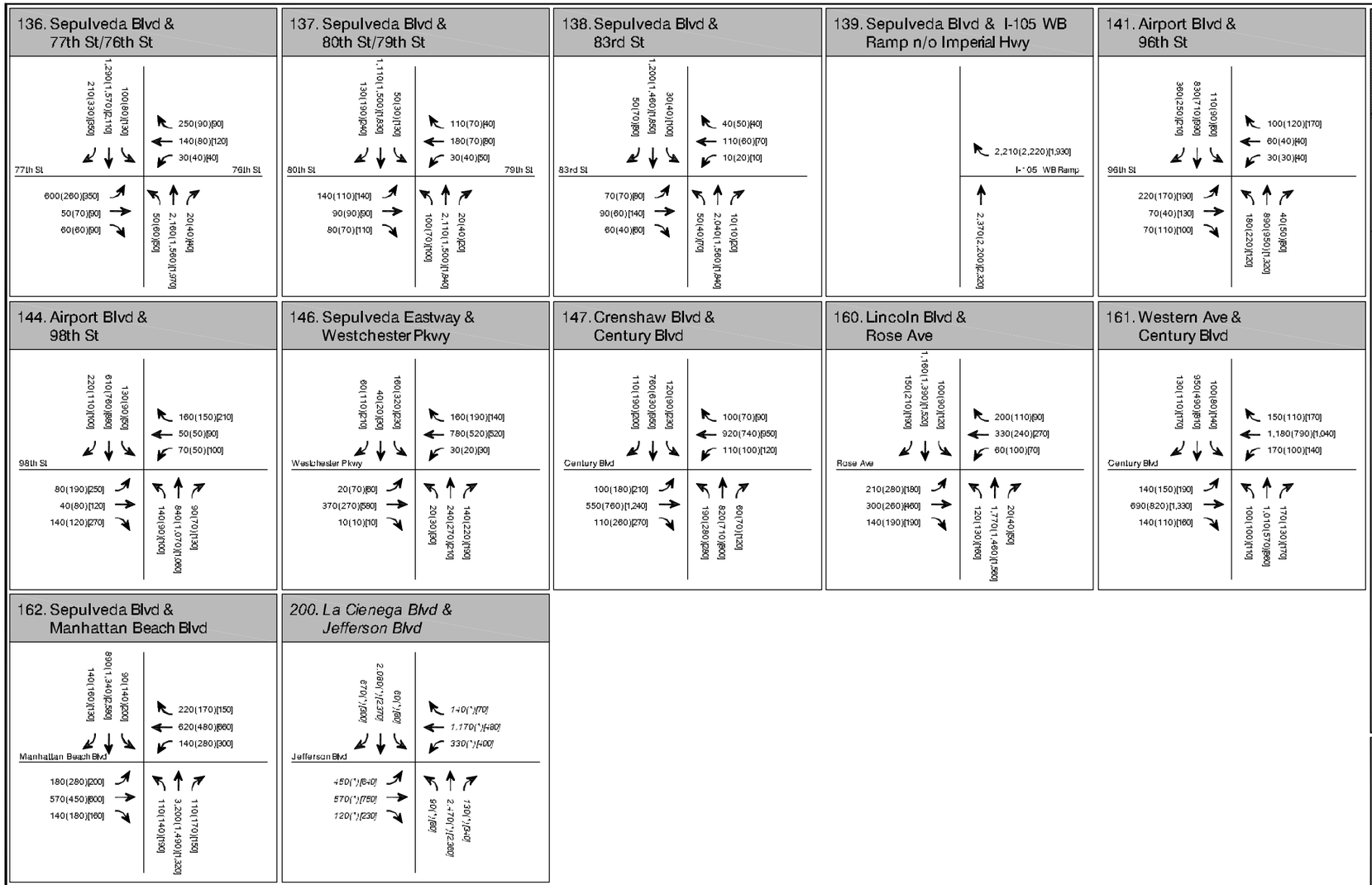
Figure 4.2-4b



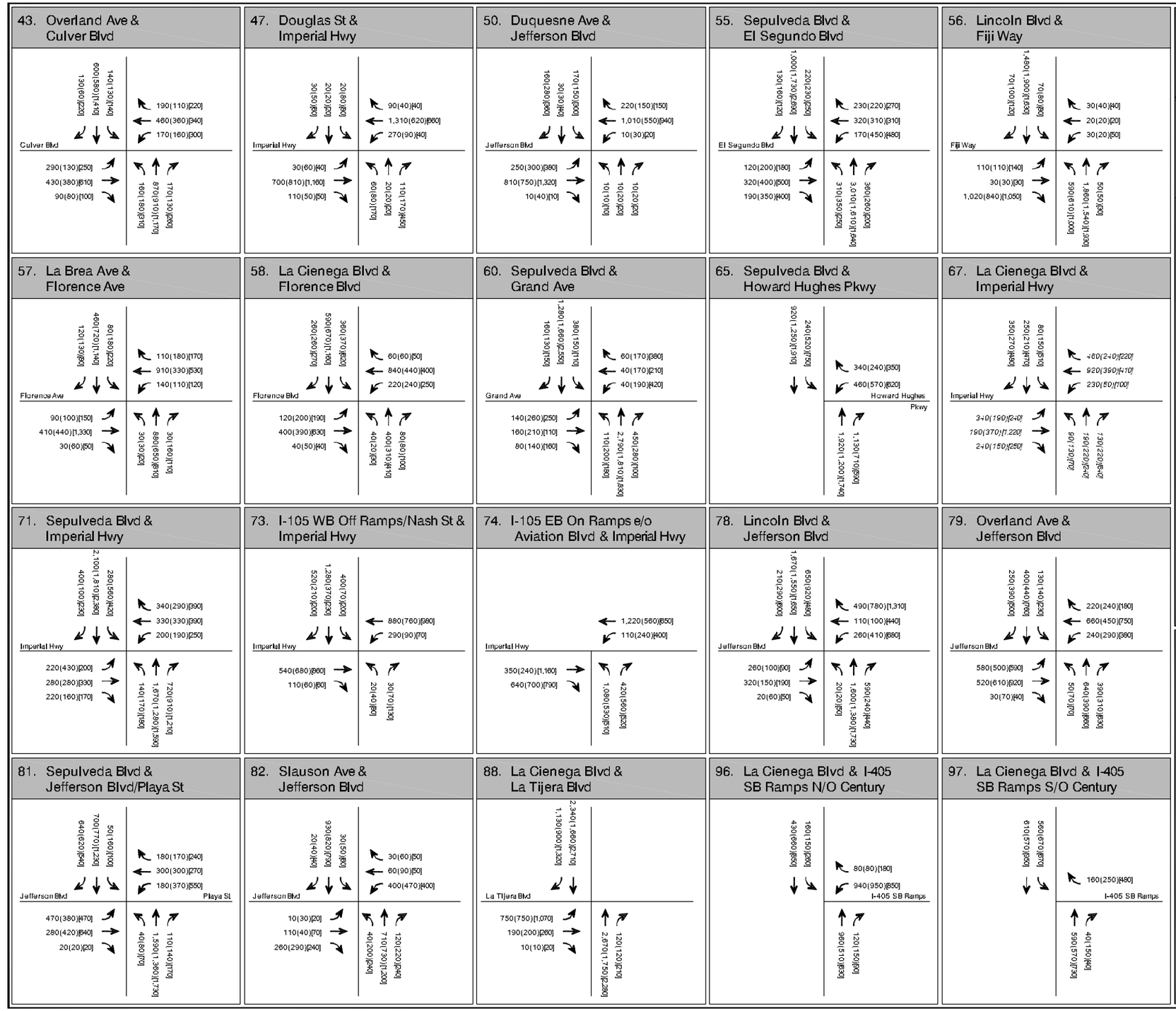
LAX Bradley West Project Draft EIR

Future (2013) With Project Traffic Volumes

Figure **4.2-4c**



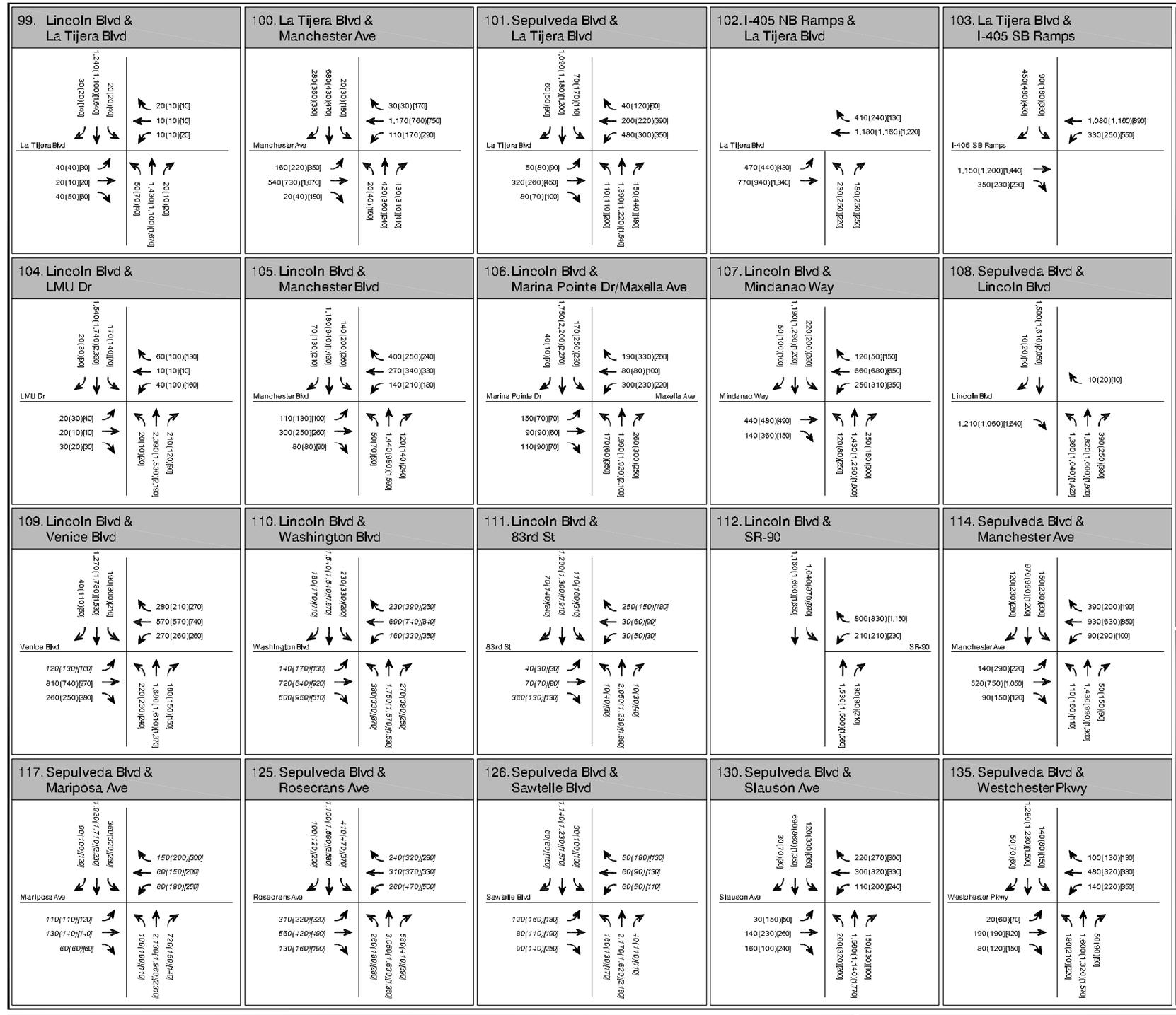
LAX Bradley West Project Draft EIR	Future (2013) With Project Traffic Volumes	Figure 4.2-4d



LAX Bradley West Project Draft EIR

Future-Adjusted (2013) Without Project Traffic Volumes

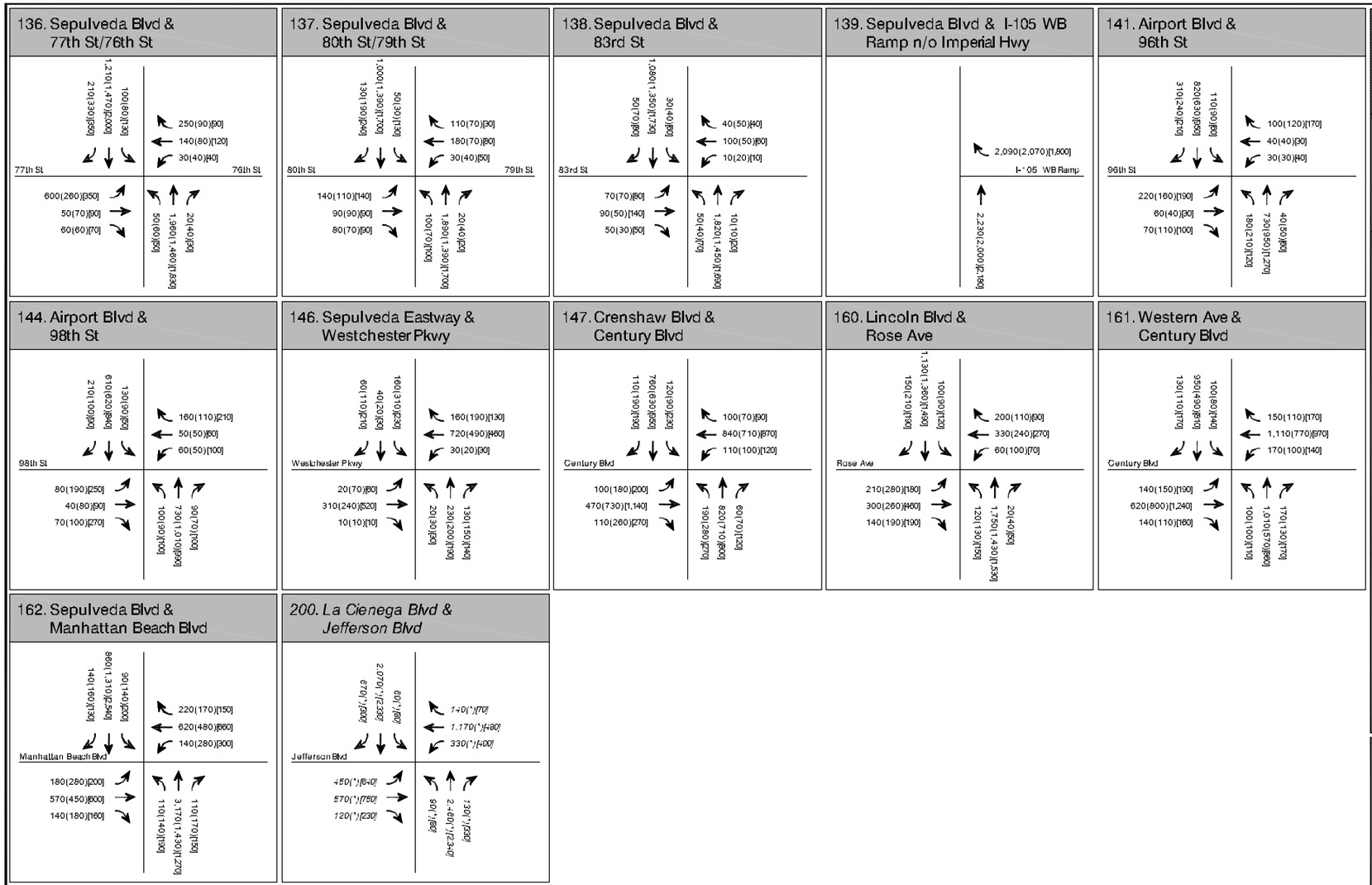
Figure **4.2-5b**



LAX Bradley West Project Draft EIR

Future-Adjusted (2013) Without Project Traffic Volumes

Figure **4.2-5c**



LAX Bradley West Project Draft EIR	Future-Adjusted (2013) Without Project Traffic Volumes	Figure 4.2-5d

10. Table 4.2-7 on page 4-154 of the Draft EIR is hereby revised as follows:

Table 4.2-7

CMP Arterial Monitoring Stations Impact Analysis: Future (2013) With Project Conditions Measured Against Future-Adjusted (2013) Without Project Conditions

				Future-Adjusted (2013) Without Project Conditions		Future (2013) With Project Conditions			
Int #	Intersection	Jurisdiction	Peak Hour	V/C	LOS	V/C	LO S	Increase in V/C	Project Impact?
26	La Cienega Blvd	Inglewood/	AM	1.037	F	1.044	F	0.007	NO
	and Centinela Ave	LA	PM	1.067	F	1.078	F	0.011	NO
29	Centinela Ave	LA	AM	1.032	F	1.035	F	0.003	NO
	and Venice Blvd		PM	1.098	F	1.100	F	0.002	NO
55	El Segundo Blvd	Caltrans/	AM	0.911	E	0.926	E	0.015	NO
	and Sepulveda Blvd	El Segundo	PM	1.023	F	1.033	F	0.010	NO
85	Manchester Blvd	Inglewood	AM	0.811	D	0.811	D	0.000	NO
	and La Brea Ave		PM	0.935	E	0.935	E	0.000	NO
93	La Cienega Blvd	LA County	AM	1.363	F	1.372	F	0.009	NO
	and Stocker Ave		PM	1.536	F	1.564	F	0.028	YES
105	Lincoln Blvd	Caltrans/LA	AM	0.519	A	0.537	A	0.018	NO
	and Manchester Blvd		PM	0.589	A	0.600	A	0.011	NO
108	Lincoln Blvd	Caltrans/LA	AM	0.377	A	0.425	A	0.048	NO
	and Sepulveda Blvd		PM	0.515	A	0.561	A	0.046	NO
109	Lincoln Blvd	Caltrans/LA	AM	0.892	D	0.910	E	0.018	NO
	and Venice Blvd		PM	0.891	D	0.911	E	0.020	NO
112	Lincoln Blvd	Caltrans/	AM	0.741	C	0.750	C	0.009	NO
	and SR-90	LA County	PM	0.709	C	0.718	C	0.009	NO
114	Manchester Ave	LA	AM	0.750	C	0.802	D	0.052	NO
	and Sepulveda Blvd		PM	0.924	E	0.980	E	0.056	NO
121	Overland Ave	Culver City/	AM	0.856	D	0.859	D	0.003	NO
	and Venice Blvd	LA	PM	0.951	E	0.955	E	0.004	NO
125	Rosecrans Ave and	El Segundo/	AM	~~1.144~~	~~F~~	~~1.164~~	~~F~~	~~0.020~~	~~YES~~
	Sepulveda Blvd	Manhattan Beach		*0.956*	*E*	*0.972*	*E*	*0.016*	*NO*
			PM	~~1.076~~	F	~~1.088~~	F	~~0.012~~	NO
				1.044		*1.054*		*0.010*	
200	La Cienega Blvd	LA	AM	1.202	F	1.205	F	0.003	NO
	and Jefferson Blvd		PM	1.149	F	1.156	F	0.007	NO
201	Crenshaw Blvd	Inglewood	AM						
	and Manchester Blvd		PM			Not Required[1]			

[1] Additional study is not required if the proposed project does not add 50 or more trips during either the a.m. or p.m. weekday peak hours of adjacent street traffic at CMP arterial monitoring stations.

Source: Fehr & Peers, 2009.

11. The first sentence of the first paragraph on page 4-161 of the Draft EIR is hereby revised as follows:

> In order to address the critical *movements* ~~movement~~ that *are* ~~is~~ significantly impacted at this intersection, it would be necessary to *widen* ~~restripe~~ the northbound approach to the Rosecrans Avenue and Sepulveda Boulevard intersection to provide two left-turn lanes, *five* ~~four~~ through lanes, and one right-turn lane and widen the southbound approach to provide two left-turn lanes, four through lanes, and one right-turn lane. However, ~~this~~ *these* improvements ~~is~~ *are* considered infeasible due to right-of-way constraints north and south of the intersection along Sepulveda Boulevard associated with providing an additional *northbound and* southbound travel lane. Therefore, this impact would be significant and unavoidable.

12. Table 4.3-1 on page 4-183 of the Draft EIR is hereby revised as follows:

Table 4.3-1

CTA Average Daily Traffic Volumes

Monthly Traffic	**2000**	**2001**	**2002**	**2003**	**2004**	**2005**	**2006**	**2007**	**2008**
January	82,136	90,683	65,135	66,039	61,775	69,554	67,727	66,999	67,483
February	79,791	87,509	61,148	60,808	59,802	60,930	63,715	65,339	64,924
March	86,627	93,186	66,794	59,921	64,431	63,748	69,034	68,380	69,819
April	92,863	96,566	68,164	60,434	68,164	64,771	69,230	70,268	69,184
May	98,052	96,341	70,867	64,306	68,155	68,982	70,303	71,599	72,022
June	102,392	101,585	72,282	65,903	74,650	75,699	72,647	73,669	75,118
July	106,445	**105,842**	75,433	74,047	**78,674**	75,635	75,895	78,342	75,640
August	**108,871**	103,308	**79,427**	**76,556**	77,986	**79,046**	**78,236**	**82,193**	**76,434**
September	95,917	59,987	66,630	60,762	66,276	68,151	67,171	68,316	65,227
October	92,169	42,370	65,166	59,904	66,395	66,607	66,981	68,152	64,260
November	96,308	56,579	62,264	59,944	65,525	68,200	70,326	72,098	64,128
December	94,551	60,649	71,845	68,666	73,107	70,700	71,978	71,900	70,972
~~Annual~~	~~1,136,122~~	~~994,605~~	~~825,155~~	~~777,290~~	~~824,940~~	~~832,023~~	~~843,243~~	~~857,255~~	~~835,211~~
~~Average Daily Traffic~~									
Average Daily Traffic [1]	~~94,692~~	~~82,884~~	~~68,763~~	~~64,774~~	~~68,901~~	~~69,335~~	~~70,270~~	~~71,438~~	~~69,601~~
	94,775	*82,892*	*68,841*	*64,840*	*68,948*	*69,406*	*70,329*	*71,492*	*69,669*
% Annual Change	--	-12.5%	-17.0%	-5.8%	~~6.4%~~ *6.3%*	~~0.6%~~ *0.7%*	1.3%	1.7%	-2.6%
Million Annual Passengers	67.3	61.6	56.2	55.0	60.7	61.5	61.0	62.4	59.8
% Annual Change	--	-8.5%	-8.8%	-2.1%	10.4%	1.3%	-0.8%	1.5%	-4.2%

[1] *Estimates for average daily traffic are calculated by weighting the monthly average daily traffic volumes by the number of days in the month. The month of February has 29 days in 2000, 2004, and 2008.*

Source: City of Los Angeles, Los Angeles World Airports, Ground Transportation Report, Ground Transportation Planning and Design, February 26, 2009. *Ricondo & Associates, Inc. June 2009.*

13. The end of the bullet that begins on the bottom of page 4-196 and continues on page 4-199 of the Draft EIR is hereby revised as follows:

- Scenario 1: *All Construction Employee Parking Occurs at the Northwest Construction Staging/Parking Area* - This analysis scenario assumes that all 601 Bradley West Project construction employee vehicles would park at the Northwest Construction Staging/Parking Area located on Westchester Parkway east of Pershing Drive. The driveway for this facility is located on the south leg of the signalized intersection of Westchester Parkway and Falmouth Avenue. Only right and left turns into and out of this driveway are permitted with no through traffic allowed between Falmouth Avenue and the driveway. Equipment and materials staging would also take place at this location. Shuttle buses would transport employees to and from the employee parking facility to the construction site. Alternatively, it is possible that LAWA may elect to use an employee parking area on the west side of the airport accessed via World Way West (located in the southeast quadrant of the interchange of World Way West with Pershing Drive).[21] *This possibility is addressed as Alternative 4 in Chapter 6.*

[21] ~~Due to its geographic proximity to the Northwest Construction Staging/Parking Area, this location accessed via World Way West was not analyzed separately and the impacts are assumed to be the same as those discussed in Scenario 1. It should be noted that the use of this location along World Way West for employee parking would reduce the amount of traffic at the study area intersection of Westchester Parkway and Pershing Drive given that employees accessing employee parking facilities from northbound Pershing Drive would not be required to drive through this intersection.~~

14. Figure 4.3-6 on page 4-207 of the Draft EIR has been revised to clarify the that the West Construction Staging Area would only be used for construction staging under the proposed project. Please see the following revised figure.

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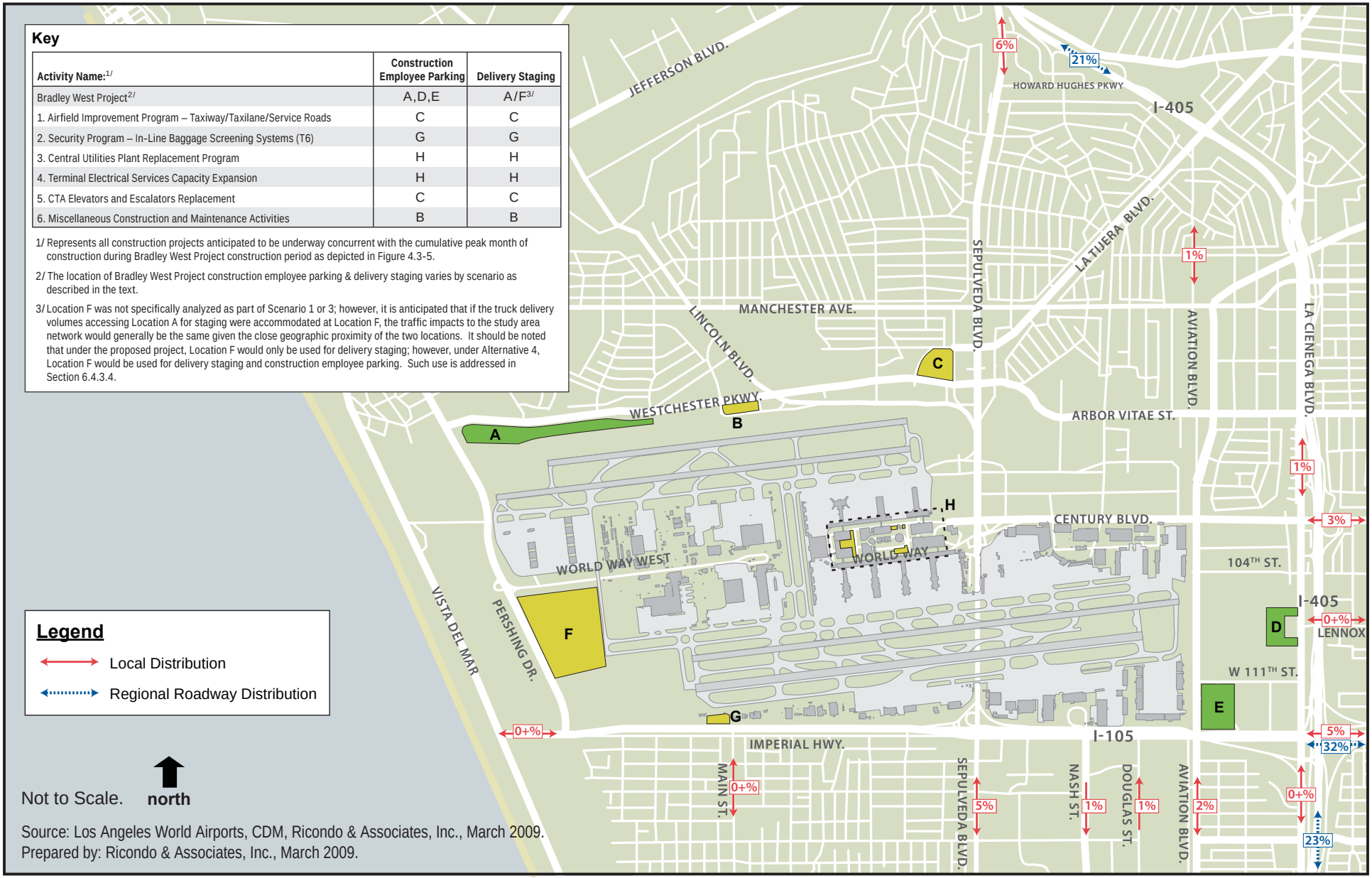


LAX Bradley West Project Draft EIR

Employee Parking and Staging Locations for Bradley West Project and Other Projects at Construction Peak

Figure **4.3-6**

15. The following text is hereby added to page 4-228 under the heading "Recommended Mitigation Program":

    - ***MM-ST (BWP)-12. Distribution of Contractor Employee Parking between the Northwest Construction Staging/Parking Area and the East Contractor Employee Parking Area or Southeast Construction Staging/Parking Area.***

      General parking for Bradley West Project contractor employees within the Northwest Construction Staging/Parking Area and within the East Contractor Employee Parking Area or Southeast Construction Staging/Parking Area shall be distributed such that neither the northwest area (i.e., Northwest Construction Staging/Parking Area) or the east/southeast area (i.e., East Contractor Employee Parking Area or Southeast Construction Staging/Parking Area) is assigned parking for more than 601 vehicles. Should the need for contractor employees' daily general parking exceed 601 vehicles in either of these areas (northwest area or east/southeast area), the additional increment of daily parking demand shall be assigned to the other area.

16. The second sentence of the first paragraph under the heading "Recommended Mitigation Program" on page 4-228 of the Draft EIR is hereby revised as follows:

    As stated in Section 4.3.8.~~2~~*1* above, neither of these mitigation measures would be needed under employee parking Scenario 2.

17. Tables 4.3-18 and 4.3-19 on pages 4-232 and 4-233 of the Draft EIR, respectively, have been revised. Please see the following revised tables.

Table 4.3-18

Level of Service With Potential Intersection Improvements

Intersection Number	Peak Hour	Intersection	Improvements	Affected Scenario	2010 Without Project (Without Improvements) V/C *[A]*	LOS	2010 With Project (Without Improvements) V/C	LOS	2010 With Project (With Improvements) V/C *[B]*	LOS	*Cumulatively Considerable Determination/Significant Impact* *Change in V/C [B] - [A]*	*Cumulatively Considerable Contribution* ~~Significance Impact with Improvements~~
#36	PM	La Cienega and Century	Improvements for this impact would involve 1) widening Century to the south for the addition of a right-turn lane on the west leg of the intersection and 2) restriping the WB approach with a resulting lane configuration of WB - 1 LT, 3 TH, 1 RT.[2]	Scenario 3	0.958	E	0.973	E	0.787	C[1]	*-0.171*	NA[1]
				Scenario 4	0.958	E	0.986	E	0.800	C[1]	*-0.158*	NA[1]
#68	PM	Imperial and Main	Mitigation for this impact involves narrowing the median island on the east leg of the intersection for the addition of a second left-turn lane.	Scenario 3	0.801	D	0.921	E	0.774	C	*-0.027*	No
				Scenario 4	0.801	D	0.881	D	0.732	C	*-0.069*	No
#69	AM	Imperial and Pershing	Mitigation for this impact involves widening Imperial to the north for the addition of a right-turn lane on the east leg of the intersection. Resulting lane configuration is WB - 1 LT, 2 TH, 2 RT.	Scenario 3	0.537	A	0.782	C	0.244	A	*-0.293*	No
				Scenario 4	0.537	A	0.702	C	0.248	A	*-0.289*	No
#114	PM	Sepulveda and Manchester	Improvements for this impact would involve widening Sepulveda to the west for the addition of a left-turn lane on the north leg of the intersection.	Scenario 3	0.902	E	0.937	E	0.856	D[1]	*-0.046*	NA[1]
				Scenario 4	0.902	E	0.927	E	0.846	D[1]	*-0.056*	NA[1]

[1] Although potential intersection improvements would reduce the impacts at this intersection, the improvements are not considered to be feasible.

[2] WB = westbound, LT - left-turn lane, TH = through lane, RT = right-turn lane

Source: Ricondo & Associates, Inc., using TRAFFIX, 2009.

Table 4.3-19

Construction-Related Impacts With Mitigation *Program*

				2010 Without Project *(Without Improvements)*		**2010 With Project *(With Mitigation Program)***		***Cumulatively Considerable Determination/Significant Impact***	
Intersection Number	**Peak Hour**	**Intersection**	**Affected Scenario**	**V/C *[A]***	**LOS**	**V/C *[B]***	**LOS**	***Change in V/C [B] - [A]***	***Cumulatively Considerable Contribution ~~Significant Impact?~~***
#36	PM	La Cienega and Century	Scenario 3	0.958	E	0.973	E	*0.015*	Yes[1]
			Scenario 4	0.958	E	0.986	E	*0.028*	*Yes*[1]
#68	PM	Imperial and Main	Scenario 3	0.801	D	0.774	C	*-0.027*	No
			Scenario 4	0.801	D	0.732	C	*-0.069*	*No*
#69	AM	Imperial and Pershing	Scenario 3	0.537	A	0.244	A	*-0.293*	No
			Scenario 4	0.537	A	0.248	A	*-0.289*	*No*
#114	PM	Sepulveda and Manchester	Scenario 3	0.902	E	0.937	E	*0.035*	Yes[1]
			Scenario 4	0.902	E	0.927	E	*0.025*	*Yes*[1]

[1] *Although potential intersection improvements would reduce the impacts at this intersection, improvements are not considered to be feasible.*

Source: Ricondo & Associates, Inc., using TRAFFIX, 2009.

18. The first bullet under the heading "4.4.5 LAX Master Plan Commitments and Mitigation Measures" on page 4-254 of the Draft EIR is hereby revised as follows:

    - **MM-AQ-1. LAX Master Plan - Mitigation Plan for Air Quality.**[123] This mitigation measure specifies that LAWA will expand and revise existing air quality mitigation programs at the airport through the development of an LAX Master Plan-Mitigation Plan for Air Quality (LAX MP-MPAQ). The goal of the LAX MP-MPAQ is to reduce air pollutant emissions associated with implementation of the LAX Master Plan to levels equal to, or less than, the thresholds of significance identified in the LAX Master Plan Final EIR. *A framework for the LAX MP-MPAQ was adopted by the Board of Airport Commissioners in December 2005. This document provides the overall structure for the overall air quality mitigation program; ultimately, the full LAX MP-MPAQ will define specific measures to be implemented within the context of the three individual components specific to the categories of emissions associated with the Master Plan, namely construction, transportation and operations (i.e., MM-AQ-2, MM-AQ-3 and MM-AQ-4, respectively).* ~~The LAX MP-MPAQ process has commenced and LAWA is working with its consultants to define the framework for the overall air quality mitigation program and to define specific measures to be implemented in three categories of emission - construction, transportation, and operations.~~ *The construction component of the LAX MP-MPAQ has been adopted by the Board of Airport Commissioners (see below); LAWA is currently working to complete the other elements of the full LAX MP-MPAQ, specifically the transportation and operations elements.*

19. The third bullet in Section 4.4.7.4 on page 4-274 of the Draft EIR is hereby revised as follows:

    - ~~On-airport~~ *Operational* emissions from ~~Bradley West Project operational~~ *cumulative* sources (in 2013) would be significant for CO, VOC, NO_x, and SO_2.

20. The following bullet is hereby added to the end of Section 4.4.7.4 on page 4-274 of the Draft EIR:

    - *Concentrations from cumulative operational sources, which were conservatively assumed to include overlapping construction impacts, would be significant for NO_2 and PM10.*

21. The first paragraph on page 4-277 of the Draft EIR is hereby revised as follows:

    The ~~maximum~~ *peak* daily and ~~maximum~~ *peak* quarterly construction-related emissions associated with the Bradley West Project would be significant for CO, VOC, NO_x, PM10 and PM2.5. Bradley West Project construction-related concentrations would be significant for NO_2 and PM10. *Emissions from project-related operational sources would be significant for CO, VOC, NO_x and SO_2. Emissions from operational off-airport traffic would be significant for CO, VOC, NO_x, PM10, and PM2.5.* Cumulative construction-related emissions for CO, VOC, NO_x, PM10, and PM2.5 would also be significant. Cumulative construction-related concentrations would be significant for NO_2 and PM10. Cumulative airfield operations-related impacts for CO, VOC, NO_x, SO_2, PM10, and PM2.5 would be significant, based on 2013 airfield activity levels compared to 2008 conditions, notwithstanding that a comparable level of 2013 airfield activity emissions would occur even if the Bradley West Project was not implemented.

22. The first sentence under the heading "Construction Staging/Parking Areas" on page 4-374 of the Draft EIR is hereby revised as follows:

    - **West Construction Staging Area** - This 70-acre construction staging area is located south of World Way West between Pershing Drive and Taxiway AA, west of the project site (see Figure 2-~~7~~*8* in Chapter 2 of this EIR).

Chapter 5, Other Environmental Resources

1. The last sentence of the first paragraph under the heading "Construction Impacts" on page 5-17 of the Draft EIR is hereby revised as follows:

   In accordance with LAX Master Plan Commitment ~~LU-1~~ *LU-4*, LAWA has, and will continue to provide community outreach efforts to property owners and occupants prior to and during construction activities of projects at LAX, including the Bradley West Project, to minimize construction-related adverse impacts to the surrounding community.

2. In conjunction with refinements to the design engineering for the Bradley West Project, the surface water drainage system improvements proposed for the Project were modified. Specifically, the amount of surface area within the Pershing Sub-basin that was originally proposed to be transferred into the Imperial Sub-basin was reduced. This design refinement allowed for a reduction in the size of several new drainage lines required for the Imperial Sub-basin, but still achieved the benefit of redirecting a portion of the flows in the Pershing Sub-basin to the Imperial Sub-basin, which has more available drainage capacity. This design refinement does not change the conclusions of the hydrology analysis presented in the Draft EIR; even with this refinement, project implementation would not result in a significant surface hydrology impact. In light of this design engineering refinement, the seventh sentence of the first paragraph under the heading "On-Site Drainage" on page 5-34 of the Draft EIR is hereby revised as follows:

   As part of the Bradley West Project, it is proposed that approximately ~~44.7~~ *34.90* acres of drainage area within the Pershing Sub-basin be improved to redirect surface flows to the Imperial Sub-basin.

   In addition, the end of the first paragraph under the heading "On-Site Drainage" on page 5-34 of the Draft EIR is hereby revised as follows:

   The redirected flows within the Pershing Sub-basin would drain to a new network of trunk lines within the Bradley West Project site, including two north-south lines, each ~~being approximately 48~~ *varying in size from 30 inches to 60* inches in diameter, connecting to ~~a 60-inch diameter line and a 72-inch diameter line. This new drainage system would connect to~~ the Imperial channel box culvert described above in Section 5.3.2.

   To reflect the refinements to the surface water drainage system, Table 5.3-1 on page 5-37 of the Draft EIR is hereby revised as follows:

Table 5.3-1

Sub-Basin Characteristics for Pre-Project and Post-Project Conditions

	Imperial Sub-Basin		Pershing Sub-Basin	
	Pre-Project	**Post-Project**	**Pre-Project**	**Post-Project**
Total Area (Acres)	524.2	~~568.9~~ *559.1*	684.0	~~639.3~~ *649.1*
Impervious Area (Acres)	440.3	~~485.0~~ *475.2*	581.4	~~542.0~~ *549.4*
25-Year Storm Volume (Cubic Feet)	6,611,100	~~7,218,300~~ *7,080,700*	8,402,700	~~7,795,500~~ *7,933,100*
25-Year Storm Flow (Cubic Feet per Second)	500.0	~~549.76~~ *539.76*	694.0	~~643.94~~ *655.6*
System Capacity (Cubic Feet per Second)	701	701	963.2	963.2

Source: Hatch Mott MacDonald, 2009.

In addition, Figure 5.3-2 on page 5-35 of the Draft EIR has been revised to show the currently proposed drainage area modification. Figure 5.3-2 has also been modified to show the location of the proposed stormwater media filter, which is described on page 5-38 of the Draft EIR. Please see the following revised figure.

The text and figure modifications described above eliminate the need for Figure 5.3-4; hence, the last sentence in the fourth paragraph under the heading "Operational Considerations" on page 5-38 of the Draft EIR is hereby revised as follows:

> The media filter BMP would be integrated into the connection from the new storm drain system to the existing Imperial channel box culvert (see **Figure ~~5.3-4~~ *5.3-2***).

3. The fourth sentence of the last paragraph on page 5-37 is hereby revised as follows:

> The reduction in surface recharge of ~~2~~*1.5* acre-feet/year would not represent a substantial interference with groundwater recharge that would result in a net decrease in the aquifer volume to the extent that beneficial uses of the basin would be adversely affected.

4. The first sentence of the third paragraph on page 5-117 of the Draft EIR is hereby revised as follows:

> As shown in Figure 2-~~6~~*7* in Chapter 2, an existing fire station (Fire Station 80)/ARFF is located on the airfield adjacent to Taxiway S and would be impacted as part of the Bradley West Project.

Chapter 6, Alternatives

1. The first sentence of the first full paragraph on page 6-10 of the Draft EIR is hereby revised as follows:

> Under Alternative 4, the design and use of the West Construction Staging Area, identified in Figure 2-~~7~~*8* in Chapter 2 of this EIR, would be optimized to consolidate the spaces designated for construction laydown and staging, and the staging area layout plan would be reconfigured to create space for approximately 600 contractor employee parking spaces.

2. The following text is hereby added to page 6-10 as the last sentence of Section 6.4.2.4:

> *Alternative 4 is further refined in the Bradley West Project Final EIR, Section 2.1, Topical Response TR-BWP-ST-1.*

3. The first sentence of the first paragraph under the heading "Air Quality and Global Climate Change" on page 6-32 of the Draft EIR is hereby revised as follows:

> Under Alternative 4, the space utilization layout of the West Construction Staging Area, identified in Figure 2-~~7~~*8* in Chapter 2 of this EIR, would be modified to provide a surface vehicle parking lot that would serve as the primary area for construction worker parking.

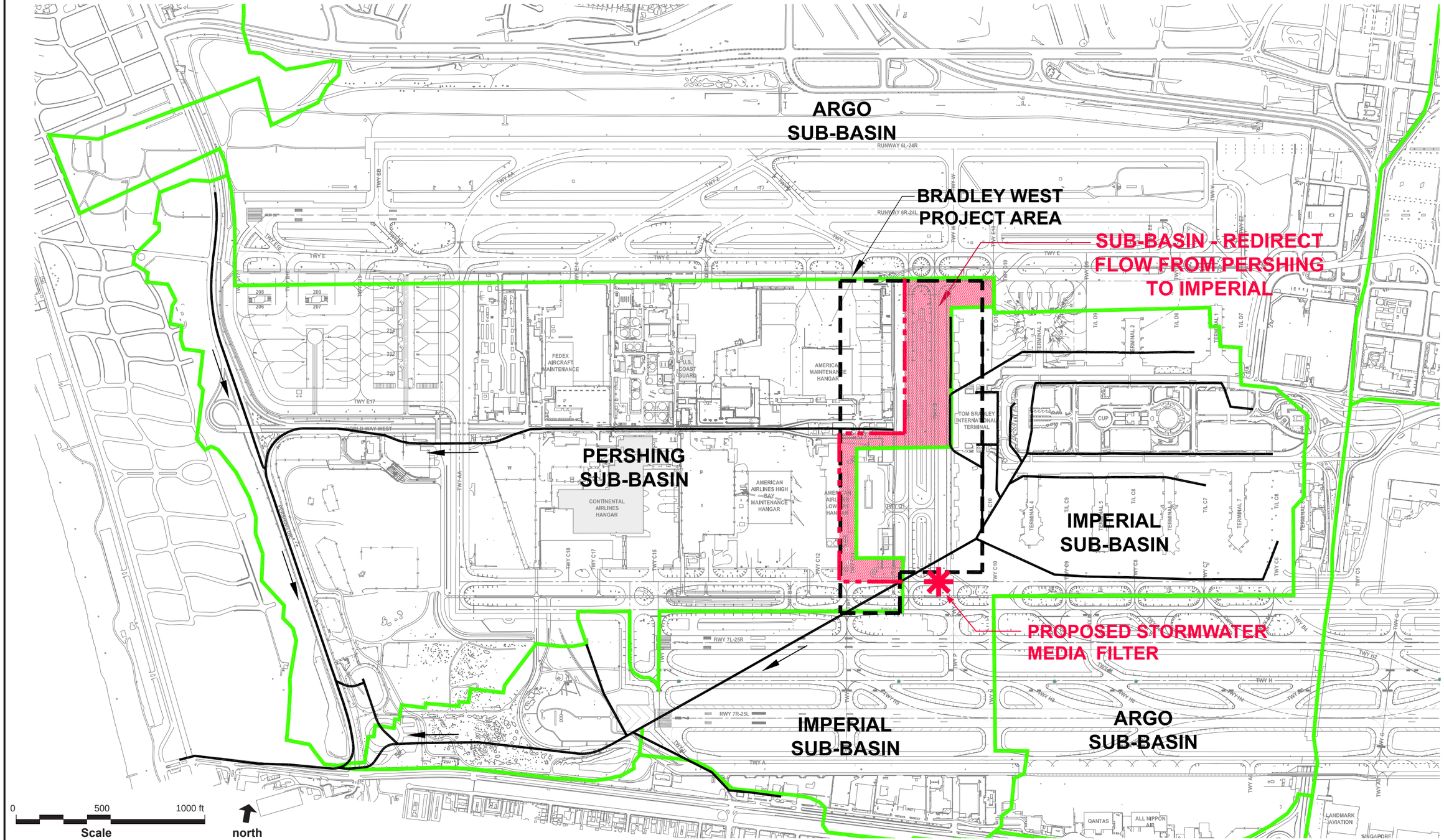
Chapter 7, List of Preparers, Parties to Whom Sent, References, NOP Comments, and List of Acronyms

1. The following reference on page 7-15 of the Draft EIR is hereby revised as follows:

> Ricondo & Associates, LAX Planning Forecast Documentation, ~~March~~ *May* 2009.

2. The following reference is hereby added after the reference titled "Ricondo & Associates, LAX Planning Forecast Documentation, May 2009" on page 7-15 of the Draft EIR:

> *Ricondo & Associates, LAX TBIT Reconfiguration Project Draft EIR 2008-2013 Design Day Flight Schedule Documentation, March 2009.*



Source: Hatch Mott MacDonald, 2009.
Prepared by: CDM, 2009.

LAX Bradley West Project Draft EIR	**Sub-Basin Flow by Drainage System**	Figure **5.3-2**

3.3 Corrections and Additions to Appendices to the Draft EIR

Appendix C-3 Intersection Lane Configurations

1. The lane configuration for Intersection #125 shown on the figure in Appendix C-3 has been revised. Please see the following revised figure.

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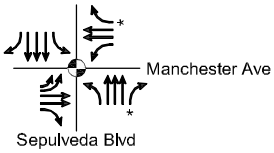
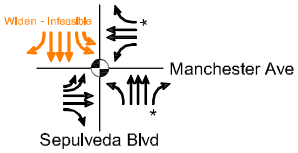
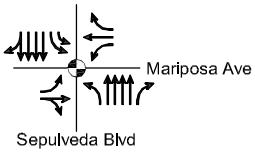
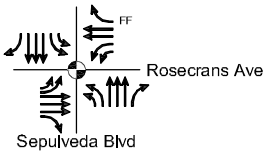
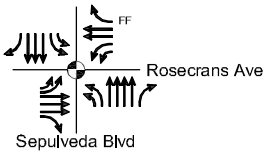
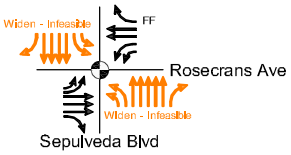
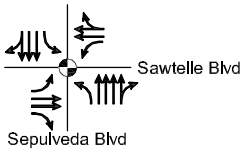
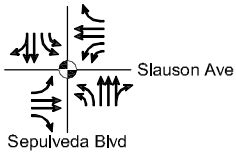
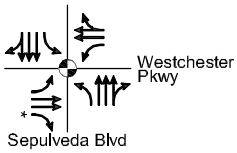
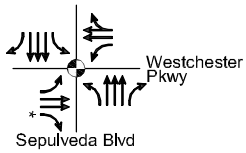
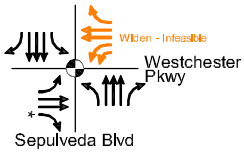
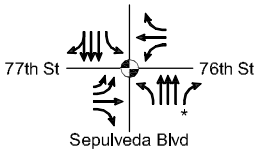
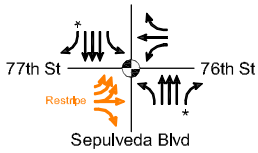
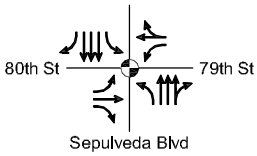
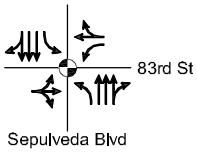
	EXISTING CONDITIONS (YEAR 2008)	FUTURE CONDITIONS (YEAR 2013)	FUTURE CONDITIONS WITH IMPROVEMENTS (YEAR 2013)
114. Sepulveda Blvd & Manchester Ave		Same As Existing Conditions	
117. Sepulveda Blvd & Mariposa Ave		Same As Existing Conditions	Same As Existing Conditions
125. Sepulveda Blvd & Rosecrans Ave			
126. Sepulveda Blvd & Sawtelle Blvd		Same As Existing Conditions	Same As Existing Conditions
130. Sepulveda Blvd & Slauson Ave		Same As Existing Conditions	Same As Existing Conditions
135. Sepulveda Blvd & Westchester Pkwy			
136. Sepulveda Blvd & 77th St/76th St		Same As Existing Conditions	
137. Sepulveda Blvd & 80th St/79th St		Same As Existing Conditions	Same As Existing Conditions
138. Sepulveda Blvd & 83rd St		Same As Existing Conditions	Same As Existing Conditions

Legend

- Signalized
- FF — Free Flow
- * — Functional Turn Lane

north

not to scale

LAX Bradley West Project Draft EIR	Intersection Lane Configurations	Appendix C-3

Appendix C-5 Level of Service Worksheets

1. LOS worksheets in Appendix C-5 for Intersection #108 have been modified. These worksheets replace worksheets for this intersection on pages 8, 21, 35, 54, 67, 80, 100, 113 and 126 of the appendix in the Draft EIR. Please see the following replacement worksheets.
2. LOS worksheets in Appendix C-5 for Intersection #125 have been modified. These worksheets replace worksheets for this intersection on pages 91, 137 and 151 of the appendix in the Draft EIR. Please see the following replacement worksheets.

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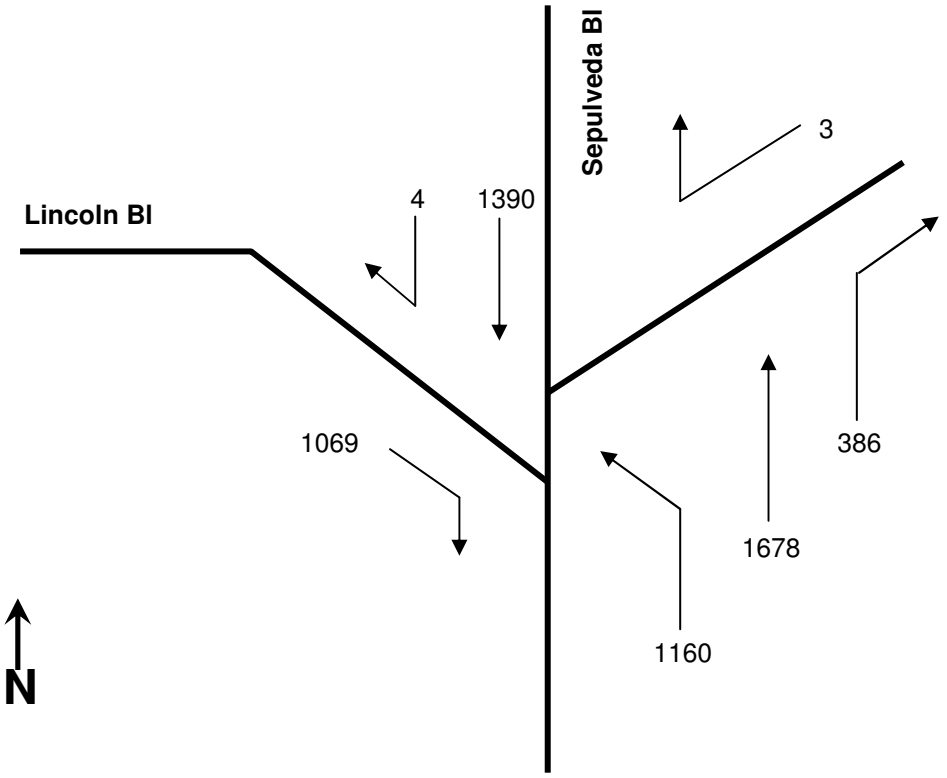
EX_AM

INTERSECTION #108
SEPULVEDA BL & LINCOLN BL
EXISTING CONDITIONS A.M. PEAK HOUR (YEAR 2008)



1) $\left\{\frac{1069}{4}\right\}$ or $\left\{\frac{1160}{4}\right\}$

= 290

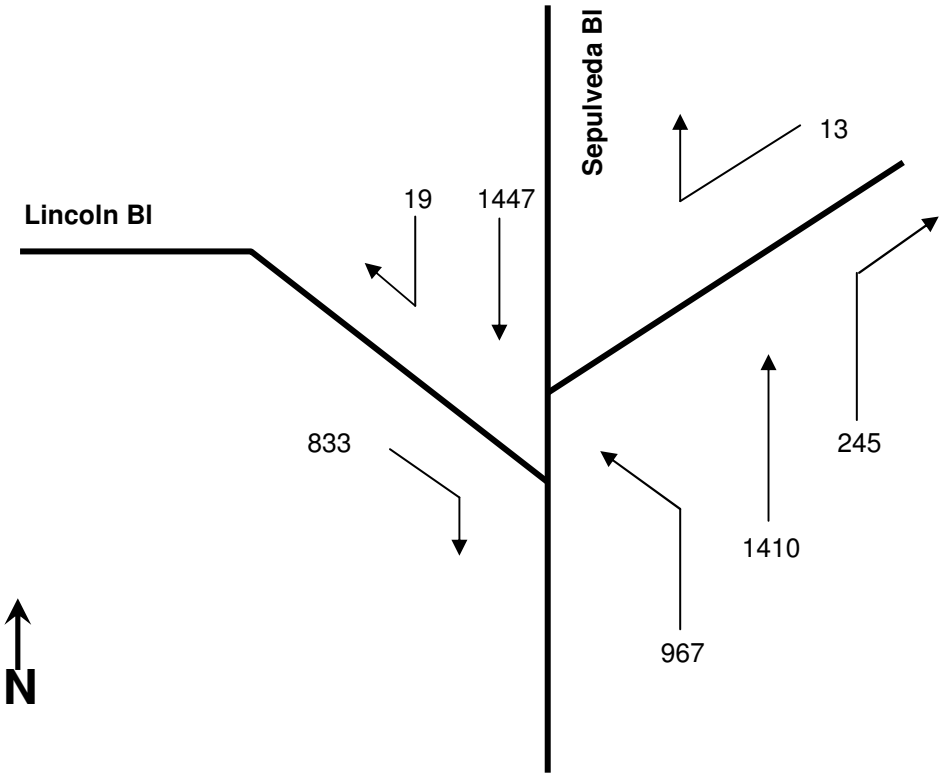
2) $\left\{\frac{1390}{4}\right\}$

= 348

Critical Volumes: **290** **+** **348** **=** **638**

V/C Ratio: $\frac{\textbf{638}}{\textbf{1,500}}$ **-** **0.00** **(ATCS)** **=** **0.425** **LOS** **A**

INTERSECTION #108
SEPULVEDA BL & LINCOLN BL
EXISTING CONDITIONS M.D. PEAK HOUR (YEAR 2008)



1) $\left\{\frac{833}{4}\right\}$ or $\left\{\frac{967}{4}\right\}$

= 242

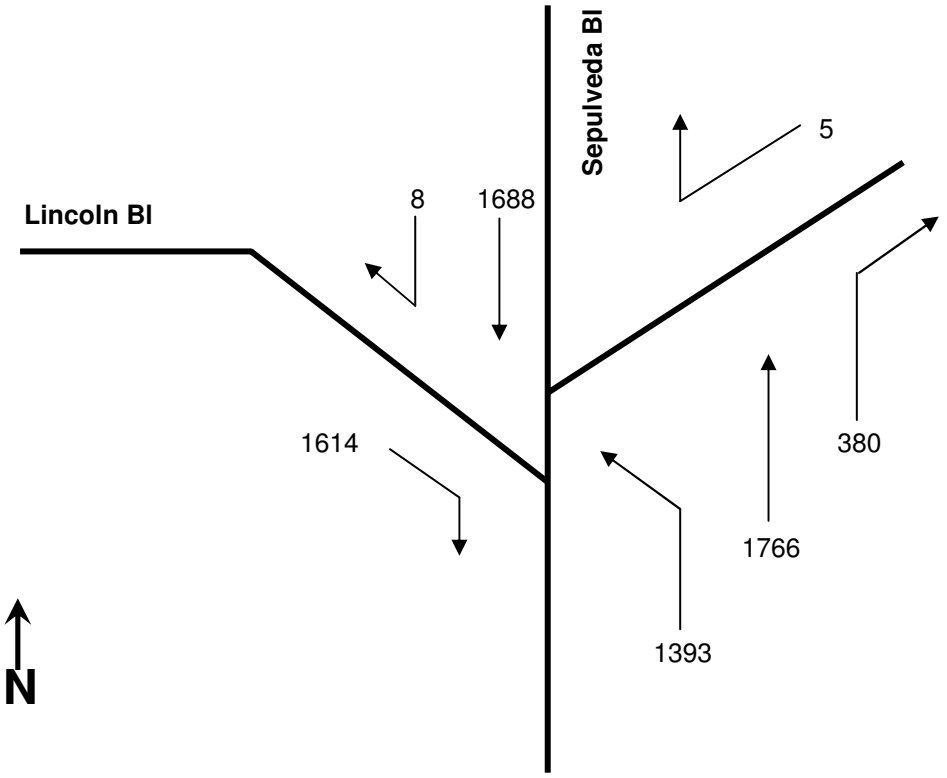
2) $\left\{\frac{1447}{4}\right\}$

= 362

Critical Volumes: **242** **+** **362** **=** **604**

V/C Ratio: $\frac{\textbf{604}}{\textbf{1,500}}$ **-** **0.00** **(ATCS)** **=** **0.403** **LOS** **A**

INTERSECTION #108
SEPULVEDA BL & LINCOLN BL
EXISTING CONDITIONS P.M. PEAK HOUR (YEAR 2008)



1) $\left\{\frac{1614}{4}\right\}$ or $\left\{\frac{1393}{4}\right\}$

= 404

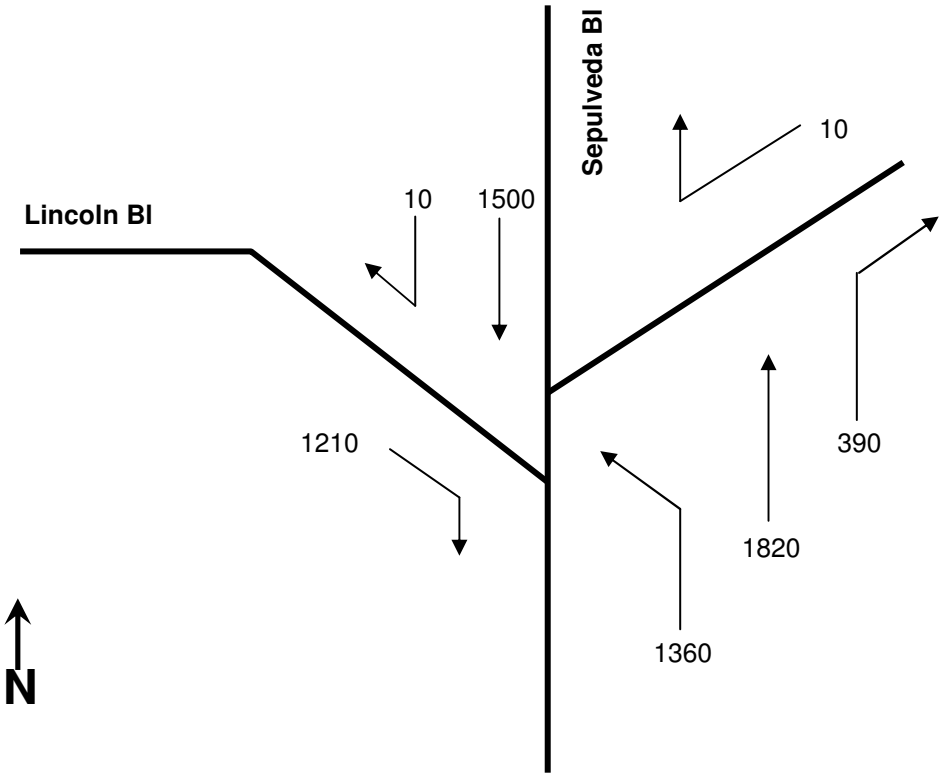
2) $\left\{\frac{1688}{4}\right\}$

= 422

Critical Volumes: **404 + 422 = 826**

V/C Ratio: $\frac{\textbf{826}}{\textbf{1,500}}$ **- 0.00 (ATCS) = 0.551** **LOS A**

INTERSECTION #108
SEPULVEDA BL & LINCOLN BL
FUTURE-ADJUSTED (2013) WITHOUT PROJECT CONDITIONS A.M. PEAK HOUR



1) $\left\{\frac{1210}{4}\right\}$ or $\left\{\frac{1360}{4}\right\}$

= 340

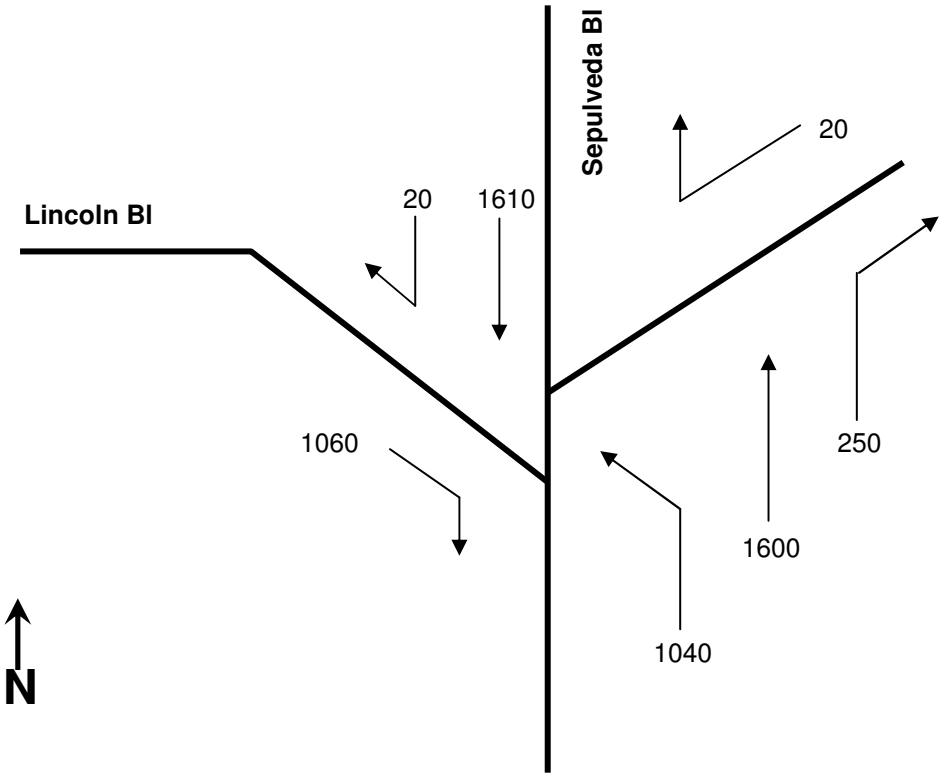
2) $\left\{\frac{1500}{4}\right\}$

= 375

Critical Volumes: **340 + 375 = 715**

V/C Ratio: $\frac{\textbf{715}}{\textbf{1,500}}$ **- 0.00 (ATCS) = 0.477** **LOS A**

INTERSECTION #108
SEPULVEDA BL & LINCOLN BL
FUTURE-ADJUSTED (2013) WITHOUT PROJECT CONDITIONS M.D. PEAK HOUR



1) $\left\{\frac{1060}{4}\right\}$ or $\left\{\frac{1040}{4}\right\}$

= 265

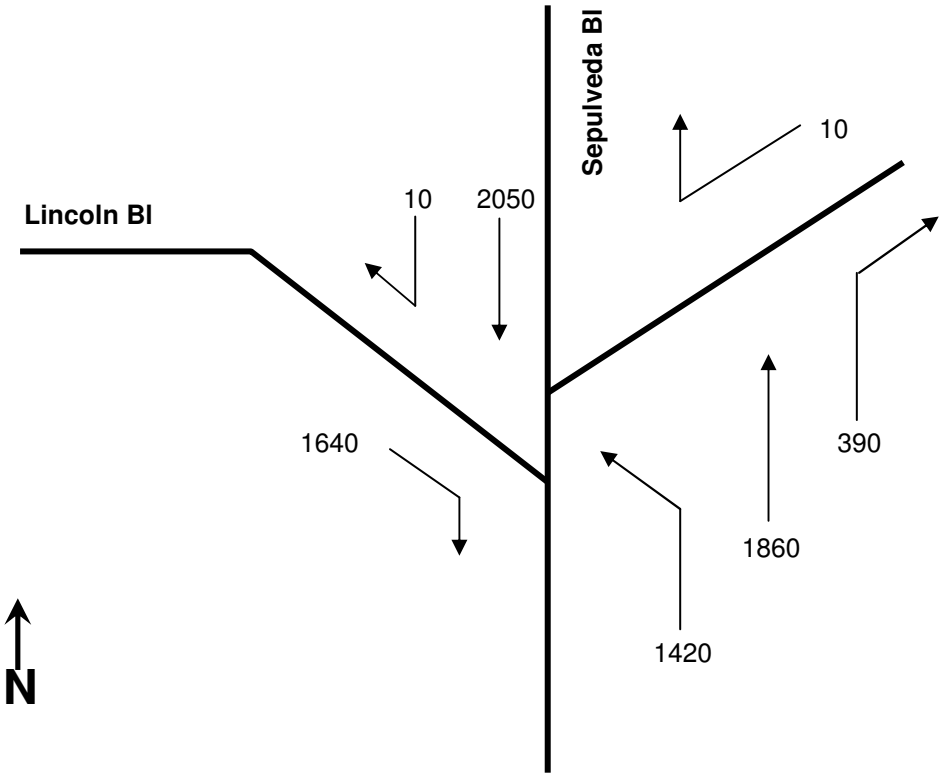
2) $\left\{\frac{1610}{4}\right\}$

= 403

Critical Volumes: **265** **+** **403** **=** **668**

V/C Ratio: $\frac{\textbf{668}}{\textbf{1,500}}$ **-** **0.00** **(ATCS)** **=** **0.445** **LOS** **A**

INTERSECTION #108
SEPULVEDA BL & LINCOLN BL
FUTURE-ADJUSTED (2013) WITHOUT PROJECT CONDITIONS P.M. PEAK HOUR



1) $\left\{\frac{1640}{4}\right\}$ or $\left\{\frac{1420}{4}\right\}$

= 410

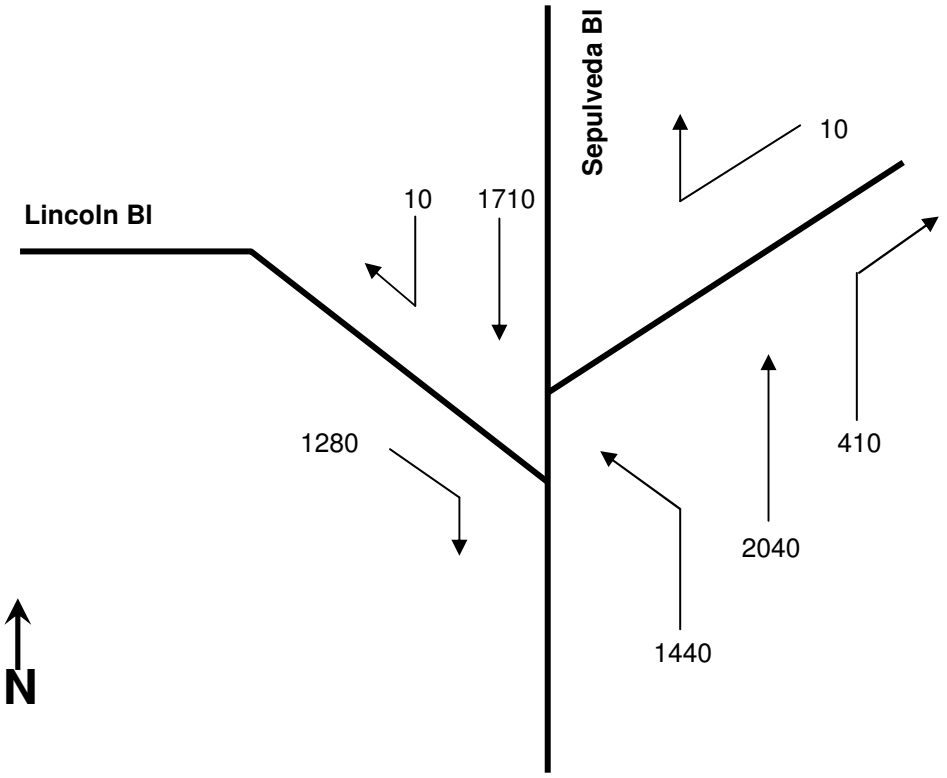
2) $\left\{\frac{2050}{4}\right\}$

= 513

Critical Volumes: **410** **+** **513** **=** **923**

V/C Ratio: $\frac{\textbf{923}}{\textbf{1,500}}$ **-** **0.00** **(ATCS)** **=** **0.615** **LOS** **B**

INTERSECTION #108
SEPULVEDA BL & LINCOLN BL
FUTURE (2013) WITH PROJECT CONDITIONS A.M. PEAK HOUR



1) $\left\{\frac{1280}{4}\right\}$ or $\left\{\frac{1440}{4}\right\}$

= 360

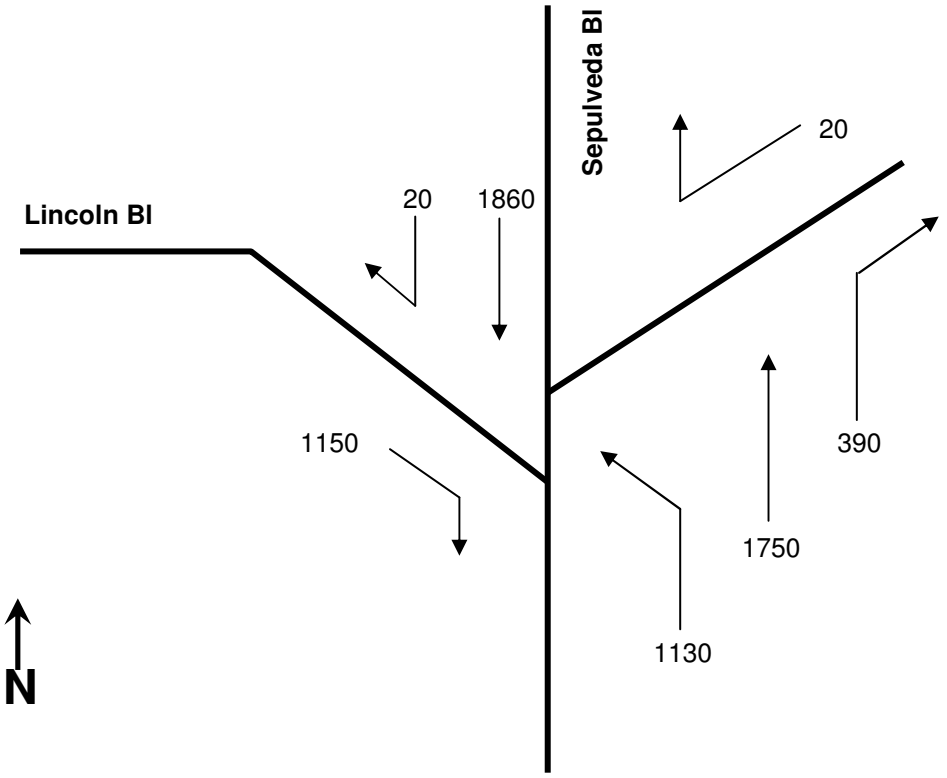
2) $\left\{\frac{1710}{4}\right\}$

= 428

Critical Volumes: **360 + 428 = 788**

V/C Ratio: $\frac{\textbf{788}}{\textbf{1,500}}$ **- 0.00 (ATCS) = 0.525** **LOS A**

INTERSECTION #108
SEPULVEDA BL & LINCOLN BL
FUTURE (2013) WITH PROJECT CONDITIONS M.D. PEAK HOUR



1) $\left\{\frac{1150}{4}\right\}$ or $\left\{\frac{1130}{4}\right\}$

= 288

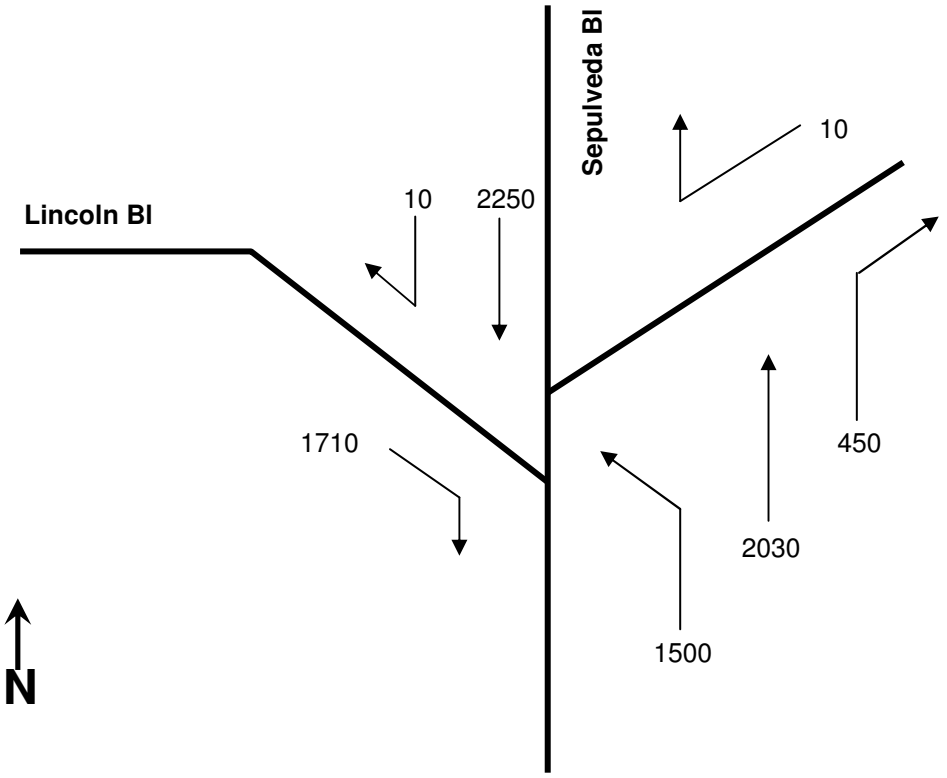
2) $\left\{\frac{1860}{4}\right\}$

= 465

Critical Volumes: **288 + 465 = 753**

V/C Ratio: $\frac{\textbf{753}}{\textbf{1,500}}$ **- 0.00 (ATCS) = 0.502** **LOS A**

INTERSECTION #108
SEPULVEDA BL & LINCOLN BL
FUTURE (2013) WITH PROJECT CONDITIONS P.M. PEAK HOUR



1) $\left\{\frac{1710}{4}\right\}$ or $\left\{\frac{1500}{4}\right\}$

= 428

2) $\left\{\frac{2250}{4}\right\}$

= 563

Critical Volumes: **428 + 563 = 991**

V/C Ratio: $\frac{\textbf{991}}{\textbf{1,500}}$ **- 0.00 (ATCS) = 0.661** **LOS B**

Project Title: **Bradley West Project**
Intersection: **125 - Rosecrans Ave and Sepulveda Blvd**
Description: **Future-Adjusted (2013) Without Project Conditions**

Date/Time: **AM PEAK HOUR**

Thru Lane:	1600 vph	N-S Split Phase :	N
Left Lane:	1600 vph	E-W Split Phase :	N
Double Lt Penalty:	20 %	Lost Time (% of cycle) :	10
ITS:	0 %	V/C Round Off (decs.) :	3
OLA Movements :	NBR		
FF Movements:	WBR		

APPROACH	MVMT	LANES	VOLUME	CAPACITY	V/C	ICU ANALYSIS	
Southbound	RT	1.00	100	1,600	0.002	N-S(1):	0.637 *
	TH	3.00	1,100	4,800	0.229	N-S(2):	0.331
	LT	2.00	410	2,560	0.160 *	E-W(1):	0.219 *
Westbound	RT	1.00	240	1,600	0.000	E-W(2):	0.218
	TH	2.00	310	3,200	0.097		
	LT	2.00	260	2,560	0.102 *	V/C:	0.856
Northbound	RT	1.00	580	1,600	0.261	Lost Time:	0.100
	TH	4.00	3,050	6,400	0.477 *	ITS:	0.000
	LT	2.00	260	2,560	0.102		
Eastbound	RT	1.00	130	1,600	0.030	ICU:	0.956
	TH	3.00	560	4,800	0.117 *		
	LT	2.00	310	2,560	0.121	LOS:	E

Date/Time: **MD PEAK HOUR**

APPROACH	MVMT	LANES	VOLUME	CAPACITY	V/C	ICU ANALYSIS	
Southbound	RT	1.00	120	1,600	0.032	N-S(1):	0.439 *
	TH	3.00	1,590	4,800	0.331	N-S(2):	0.401
	LT	2.00	470	2,560	0.184 *	E-W(1):	0.272 *
Westbound	RT	1.00	320	1,600	0.000	E-W(2):	0.202
	TH	2.00	370	3,200	0.116		
	LT	2.00	470	2,560	0.184 *	V/C:	0.711
Northbound	RT	1.00	410	1,600	0.073	Lost Time:	0.100
	TH	4.00	1,630	6,400	0.255 *	ITS:	0.000
	LT	2.00	180	2,560	0.070		
Eastbound	RT	1.00	160	1,600	0.065	ICU:	0.811
	TH	3.00	420	4,800	0.088 *		
	LT	2.00	220	2,560	0.086	LOS:	D

Date/Time: **PM PEAK HOUR**

APPROACH	MVMT	LANES	VOLUME	CAPACITY	V/C	ICU ANALYSIS	
Southbound	RT	1.00	200	1,600	0.082	N-S(1):	0.358
	TH	3.00	2,580	4,800	0.538 *	N-S(2):	0.647 *
	LT	2.00	370	2,560	0.145	E-W(1):	0.297 *
Westbound	RT	1.00	280	1,600	0.000	E-W(2):	0.189
	TH	2.00	330	3,200	0.103		
	LT	2.00	500	2,560	0.195 *	V/C:	0.944
Northbound	RT	1.00	390	1,600	0.048	Lost Time:	0.100
	TH	4.00	1,360	6,400	0.213	ITS:	0.000
	LT	2.00	280	2,560	0.109 *		
Eastbound	RT	1.00	190	1,600	0.064	ICU:	1.044
	TH	3.00	490	4,800	0.102 *		
	LT	2.00	220	2,560	0.086	LOS:	F

* - Denotes critical movement

Project Title: **Bradley West Project**
Intersection: **125 - Rosecrans Ave and Sepulveda Blvd**
Description: **Future (2013) With Project Conditions**

Date/Time: **AM PEAK HOUR**

Thru Lane:	1600 vph	N-S Split Phase :	N
Left Lane:	1600 vph	E-W Split Phase :	N
Double Lt Penalty:	20 %	Lost Time (% of cycle) :	10
ITS:	0 %	V/C Round Off (decs.) :	3
OLA Movements :	NBR		
FF Movements:	WBR		

APPROACH	MVMT	LANES	VOLUME	CAPACITY	V/C	ICU ANALYSIS	
Southbound	RT	1.00	100	1,600	0.000	N-S(1):	0.646 *
	TH	3.00	1,140	4,800	0.238	N-S(2):	0.340
	LT	2.00	410	2,560	0.160 *	E-W(1):	0.219
Westbound	RT	1.00	250	1,600	0.000	E-W(2):	0.226 *
	TH	2.00	310	3,200	0.097 *		
	LT	2.00	260	2,560	0.102	V/C:	0.872
Northbound	RT	1.00	580	1,600	0.261	Lost Time:	0.100
	TH	4.00	3,110	6,400	0.486 *	ITS:	0.000
	LT	2.00	260	2,560	0.102		
Eastbound	RT	1.00	130	1,600	0.030	ICU:	0.972
	TH	3.00	560	4,800	0.117		
	LT	2.00	330	2,560	0.129 *	LOS:	E

Date/Time: **MD PEAK HOUR**

APPROACH	MVMT	LANES	VOLUME	CAPACITY	V/C	ICU ANALYSIS	
Southbound	RT	1.00	120	1,600	0.030	N-S(1):	0.450 *
	TH	3.00	1,630	4,800	0.340	N-S(2):	0.410
	LT	2.00	470	2,560	0.184 *	E-W(1):	0.272 *
Westbound	RT	1.00	330	1,600	0.000	E-W(2):	0.206
	TH	2.00	370	3,200	0.116		
	LT	2.00	470	2,560	0.184 *	V/C:	0.722
Northbound	RT	1.00	410	1,600	0.073	Lost Time:	0.100
	TH	4.00	1,700	6,400	0.266 *	ITS:	0.000
	LT	2.00	180	2,560	0.070		
Eastbound	RT	1.00	160	1,600	0.065	ICU:	0.822
	TH	3.00	420	4,800	0.088 *		
	LT	2.00	230	2,560	0.090	LOS:	D

Date/Time: **PM PEAK HOUR**

APPROACH	MVMT	LANES	VOLUME	CAPACITY	V/C	ICU ANALYSIS	
Southbound	RT	1.00	200	1,600	0.082	N-S(1):	0.367
	TH	3.00	2,630	4,800	0.548 *	N-S(2):	0.657 *
	LT	2.00	370	2,560	0.145	E-W(1):	0.297 *
Westbound	RT	1.00	290	1,600	0.000	E-W(2):	0.189
	TH	2.00	330	3,200	0.103		
	LT	2.00	500	2,560	0.195 *	V/C:	0.954
Northbound	RT	1.00	390	1,600	0.048	Lost Time:	0.100
	TH	4.00	1,420	6,400	0.222	ITS:	0.000
	LT	2.00	280	2,560	0.109 *		
Eastbound	RT	1.00	190	1,600	0.064	ICU:	1.054
	TH	3.00	490	4,800	0.102 *		
	LT	2.00	220	2,560	0.086	LOS:	F

* - Denotes critical movement

Project Title: **Bradley West Project**
Intersection: **125 - Rosecrans Ave and Sepulveda Blvd**
Description: **Future (2013) With Project Conditions**

Date/Time: **AM PEAK HOUR**

Thru Lane:	1600 vph	N-S Split Phase :	N
Left Lane:	1600 vph	E-W Split Phase :	N
Double Lt Penalty:	20 %	Lost Time (% of cycle) :	10
ITS:	0 %	V/C Round Off (decs.) :	3
OLA Movements :	NBR		
FF Movements:	WBR		

APPROACH	MVMT	LANES	VOLUME	CAPACITY	V/C	ICU ANALYSIS	
Southbound	RT	1.00	100	1,600	0.000	N-S(1):	0.549 *
	TH	4.00	1,140	6,400	0.178	N-S(2):	0.280
	LT	2.00	410	2,560	0.160 *	E-W(1):	0.219
Westbound	RT	1.00	250	1,600	0.000	E-W(2):	0.226 *
	TH	2.00	310	3,200	0.097 *		
	LT	2.00	260	2,560	0.102	V/C:	0.775
Northbound	RT	1.00	580	1,600	0.261	Lost Time:	0.100
	TH	5.00	3,110	8,000	0.389 *	ITS:	0.000
	LT	2.00	260	2,560	0.102		
Eastbound	RT	1.00	130	1,600	0.030	ICU:	0.875
	TH	3.00	560	4,800	0.117		
	LT	2.00	330	2,560	0.129 *	LOS:	D

Date/Time: **MD PEAK HOUR**

APPROACH	MVMT	LANES	VOLUME	CAPACITY	V/C	ICU ANALYSIS	
Southbound	RT	1.00	120	1,600	0.030	N-S(1):	0.397 *
	TH	4.00	1,630	6,400	0.255	N-S(2):	0.325
	LT	2.00	470	2,560	0.184 *	E-W(1):	0.272 *
Westbound	RT	1.00	330	1,600	0.000	E-W(2):	0.206
	TH	2.00	370	3,200	0.116		
	LT	2.00	470	2,560	0.184 *	V/C:	0.669
Northbound	RT	1.00	410	1,600	0.073	Lost Time:	0.100
	TH	5.00	1,700	8,000	0.213 *	ITS:	0.000
	LT	2.00	180	2,560	0.070		
Eastbound	RT	1.00	160	1,600	0.065	ICU:	0.769
	TH	3.00	420	4,800	0.088 *		
	LT	2.00	230	2,560	0.090	LOS:	C

Date/Time: **PM PEAK HOUR**

APPROACH	MVMT	LANES	VOLUME	CAPACITY	V/C	ICU ANALYSIS	
Southbound	RT	1.00	200	1,600	0.082	N-S(1):	0.323
	TH	4.00	2,630	6,400	0.411 *	N-S(2):	0.520 *
	LT	2.00	370	2,560	0.145	E-W(1):	0.297 *
Westbound	RT	1.00	290	1,600	0.000	E-W(2):	0.189
	TH	2.00	330	3,200	0.103		
	LT	2.00	500	2,560	0.195 *	V/C:	0.817
Northbound	RT	1.00	390	1,600	0.048	Lost Time:	0.100
	TH	5.00	1,420	8,000	0.178	ITS:	0.000
	LT	2.00	280	2,560	0.109 *		
Eastbound	RT	1.00	190	1,600	0.064	ICU:	0.917
	TH	3.00	490	4,800	0.102 *		
	LT	2.00	220	2,560	0.086	LOS:	E

* - Denotes critical movement

Appendix C-7 Estimate d Airport-Related Vehi cle Tr ip Ge neration for Off -Airport Intersec tion Analysis

1. The third paragraph on page 1 in Appendix C-7 of the Draft EIR is hereby revised as follows:

> It is ~~anticipated~~ *assumed* that the aircraft arrivals and departures time schedules for the TBIT and other CTA terminals for the future "With Project" and "Without Project" conditions ~~would be essentially the same~~ *are identical*. The scheduled aircraft would also be the same except for minor differences pertaining to the "downsizing" of four aircraft from ~~an Airbus A-380 to a smaller Boeing 777~~ *four ADG VI to four ADG V aircraft* under the "Without Project" condition due to taxiway limitations that would preclude the larger *A380* ~~A-380~~ aircraft from accessing certain TBIT gates if the ~~P~~*p*roject were not constructed.

Appendix D-4 Study Area Intersection Capacity Analysis

1. TRAFFIX Analysis Reports for Scenarios 3 and 4, which provide the basis for the Scenario 3 and 4 volume to capacity and level of service values in Table 4.3-18 of the Draft EIR, are hereby added to Appendix D-4 of the Draft EIR. Please see the following worksheets.

Table of Contents

TRAFFIX Analysis Reports

Baseline (2008) AM Peak

Baseline (2008) PM Peak

2010 Without Project AM Peak

2010 Without Project PM Peak

2010 With Project Scenario 3 AM Peak

2010 With Project Scenario 3 PM Peak

2010 With Project Scenario 4 AM Peak

2010 With Project Scenario 4 PM Peak

2008 With Project Scenario 1 AM Peak

2008 With Project Scenario 1 PM Peak

2008 With Project Scenario 2 AM Peak

2008 With Project Scenario 2 PM Peak

2008 With Project Scenario 3 AM Peak

2008 With Project Scenario 3 PM Peak

2008 With Project Scenario 4 AM Peak

2008 With Project Scenario 4 PM Peak

Mitigation Scenario 3

Mitigation Scenario 4

```
Mitigation-Scenario 3 PM
--------------------------------------------------------------------------------
                              BRADLEY WEST
--------------------------------------------------------------------------------
                     Level Of Service Computation Report
            Circular 212 Planning Method (Base Volume Alternative)
********************************************************************************
Intersection #36 La CIENEGA BLVD. @ CENTURY BLVD
********************************************************************************
Cycle (sec):        100               Critical Vol./Cap. (X):        0.857
Loss Time (sec):      0 (Y+R =  4 sec) Average Delay (sec/veh):      xxxxxx
Optimal Cycle:      159               Level Of Service:                 D
********************************************************************************
Street Name:         La CIENEGA BLVD.                  CENTURY BLVD.
Approach:      North Bound      South Bound       East Bound       West Bound
Movement:     L  -  T  -  R    L  -  T  -  R    L  -  T  -  R    L  -  T  -  R
------------|---------------||---------------||---------------||---------------|
Control:       Prot+Permit      Prot+Permit      Prot+Permit      Prot+Permit
Rights:            Ovl              Ovl              Ovl              Ovl
Min. Green:     0    0     0     0    0     0     0    0     0     0    0     0
Lanes:        1  0  2  0  2    1  0  2  0  2    1  0  3  0  2    1  0  3  0  1
------------|---------------||---------------||---------------||---------------|
Volume Module:
Base Vol:     157  320   643   404  610   460   169 1262   833   119  790   244
Growth Adj:  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
Initial Bse:  157  320   643   404  610   460   169 1262   833   119  790   244
User Adj:    1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
PHF Adj:     1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
PHF Volume:   157  320   643   404  610   460   169 1262   833   119  790   244
Reduct Vol:     0    0     0     0    0     0     0    0     0     0    0     0
Reduced Vol:  157  320   643   404  610   460   169 1262   833   119  790   244
PCE Adj:     1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
MLF Adj:     1.00 1.00  1.10  1.00 1.00  1.10  1.00 1.00  1.10  1.00 1.00  1.00
Final Vol.:   157  320   707   404  610   506   169 1262   916   119  790   244
------------|---------------||---------------||---------------||---------------|
Saturation Flow Module:
Sat/Lane:    1375 1375  1375  1375 1375  1375  1375 1375  1375  1375 1375  1375
Adjustment:  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
Lanes:       1.00 2.00  2.00  1.00 2.00  2.00  1.00 3.00  2.00  1.00 3.00  1.00
Final Sat.:  1375 2750  2750  1375 2750  2750  1375 4125  2750  1375 4125  1375
------------|---------------||---------------||---------------||---------------|
Capacity Analysis Module:
Vol/Sat:     0.11 0.12  0.26  0.29 0.22  0.18  0.12 0.31  0.33  0.09 0.19  0.18
Crit Vol:             354   404                   421           0
Crit Moves:          ****  ****                 ****         ****
********************************************************************************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Mitigation-2010 plus Other Thu Jul 2, 2009 17:22:42-4:30 PM)        Page 13-1
```

```
Mitigation-Scenario 3 PM
--------------------------------------------------------------------------------
                              BRADLEY WEST
--------------------------------------------------------------------------------
                     Level Of Service Computation Report
           Circular 212 Planning Method (Base Volume Alternative)
********************************************************************************
Intersection #68 IMPERIAL HWY @MAIN STREET
********************************************************************************
Cycle (sec):        100               Critical Vol./Cap. (X):        0.844
Loss Time (sec):      0 (Y+R =  4 sec) Average Delay (sec/veh):      xxxxxx
Optimal Cycle:      146               Level Of Service:                 D
********************************************************************************
Street Name:           MAIN STREET                     IMPERIAL HWY
Approach:      North Bound      South Bound       East Bound       West Bound
Movement:     L  -  T  -  R    L  -  T  -  R    L  -  T  -  R    L  -  T  -  R
------------|---------------||---------------||---------------||---------------|
Control:       Split Phase      Split Phase       Protected        Protected
Rights:           Ignore           Include          Include          Include
Min. Green:     0    0     0     0    0     0     0    0     0     0    0     0
Lanes:        1  1  0  0  1    1  0  0  0  0    0  0  2  0  1    2  0  2  0  1
------------|---------------||---------------||---------------||---------------|
Volume Module:
Base Vol:     230    0   394    54    0     0     0 1342   302   561 1008     0
Growth Adj:  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
Initial Bse:  230    0   394    54    0     0     0 1342   302   561 1008     0
User Adj:    1.00 1.00  0.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
PHF Adj:     1.00 1.00  0.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
PHF Volume:   230    0     0    54    0     0     0 1342   302   561 1008     0
Reduct Vol:     0    0     0     0    0     0     0    0     0     0    0     0
Reduced Vol:  230    0     0    54    0     0     0 1342   302   561 1008     0
PCE Adj:     1.00 1.00  0.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
MLF Adj:     1.10 1.00  0.00  1.00 1.00  1.00  1.00 1.00  1.00  1.10 1.00  1.00
Final Vol.:   253    0     0    54    0     0     0 1342   302   617 1008     0
------------|---------------||---------------||---------------||---------------|
Saturation Flow Module:
Sat/Lane:    1375 1375  1375  1375 1375  1375  1375 1375  1375  1375 1375  1375
Adjustment:  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
Lanes:       2.00 0.00  1.00  1.00 0.00  0.00  0.00 2.00  1.00  2.00 2.00  1.00
Final Sat.:  2750    0  1375  1375    0     0     0 2750  1375  2750 2750  1375
------------|---------------||---------------||---------------||---------------|
Capacity Analysis Module:
Vol/Sat:     0.09 0.00  0.00  0.04 0.00  0.00  0.00 0.49  0.22  0.22 0.37  0.00
Crit Vol:     127              54                   671          309
Crit Moves:  ****             ****                 ****         ****
********************************************************************************



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```

```
Mitigation-Scenario 3 AM
--------------------------------------------------------------------------------
                              BRADLEY WEST
--------------------------------------------------------------------------------
                     Level Of Service Computation Report
           Circular 212 Planning Method (Base Volume Alternative)
********************************************************************************
Intersection #69 IMPERIAL HWY @ PERSHING DR.
********************************************************************************
Cycle (sec):        100               Critical Vol./Cap. (X):        0.314
Loss Time (sec):      0 (Y+R =  4 sec) Average Delay (sec/veh):      xxxxxx
Optimal Cycle:       27               Level Of Service:                 A
********************************************************************************
Street Name:    PERSHING DR./HYPERION DWY.              IMPERIAL HWY
Approach:      North Bound      South Bound       East Bound       West Bound
Movement:     L  -  T  -  R    L  -  T  -  R    L  -  T  -  R    L  -  T  -  R
------------|---------------||---------------||---------------||---------------|
Control:       Split Phase      Split Phase        Permitted        Permitted
Rights:           Include          Include          Include          Ovl
Min. Green:     0    0     0     0    0     0     0    0     0     0    0     0
Lanes:        0  0  1! 0  0    1  1  0  1  0    2  0  1  1  0    0  1  1  0  2
------------|---------------||---------------||---------------||---------------|
Volume Module:
Base Vol:       1    0     1   564    2    43   138  250     4     8  259  1136
Growth Adj:  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
Initial Bse:    1    0     1   564    2    43   138  250     4     8  259  1136
User Adj:    1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
PHF Adj:     1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
PHF Volume:     1    0     1   564    2    43   138  250     4     8  259  1136
Reduct Vol:     0    0     0     0    0     0     0    0     0     0    0     0
Reduced Vol:    1    0     1   564    2    43   138  250     4     8  259  1136
PCE Adj:     1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
MLF Adj:     1.00 1.00  1.00  1.10 1.00  1.00  1.10 1.00  1.00  1.00 1.00  1.10
Final Vol.:     1    0     1   620    2    43   152  250     4     8  259  1250
------------|---------------||---------------||---------------||---------------|
Saturation Flow Module:
Sat/Lane:    1425 1425  1425  1425 1425  1425  1425 1425  1425  1425 1425  1425
Adjustment:  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
Lanes:       0.50 0.00  0.50  2.00 0.04  0.96  2.00 1.97  0.03  0.06 1.94  2.00
Final Sat.:   713    0   713  2850   63  1362  2850 2805    45    85 2765  2850
------------|---------------||---------------||---------------||---------------|
Capacity Analysis Module:
Vol/Sat:     0.00 0.00  0.00  0.22 0.03  0.03  0.05 0.09  0.09  0.09 0.09  0.44
Crit Vol:                 2   310                  127           8
Crit Moves:             ****  ****               ****        ****
********************************************************************************
```

```
Mitigation-Scenario 3 PM
--------------------------------------------------------------------------------
                            BRADLEY WEST
--------------------------------------------------------------------------------
                     Level Of Service Computation Report
           Circular 212 Planning Method (Base Volume Alternative)
********************************************************************************
Intersection #114 SEPULVEDA BLVD. @ MANCHESTER AVE.
********************************************************************************
Cycle (sec):        100               Critical Vol./Cap. (X):        0.926
Loss Time (sec):      0 (Y+R =  4 sec) Average Delay (sec/veh):      xxxxxx
Optimal Cycle:      180               Level Of Service:                 E
********************************************************************************
Street Name:       Sepulveda Boulevard               Manchester Avenue
Approach:      North Bound      South Bound       East Bound       West Bound
Movement:     L  -  T  -  R    L  -  T  -  R    L  -  T  -  R    L  -  T  -  R
------------|---------------||---------------||---------------||---------------|
Control:       Prot+Permit       Prot+Permit       Protected       Prot+Permit
Rights:           Include           Include           Include           Include
Min. Green:     0    0     0     0    0     0     0    0     0     0    0     0
Lanes:        1  0  3  0  1    2  0  3  0  1    2  0  2  0  1    1  0  2  0  1
------------|---------------||---------------||---------------||---------------|
Volume Module:
Base Vol:     111 1584    87   248 1290   272   217 1031   101    93  869   196
Growth Adj:  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
Initial Bse:  111 1584    87   248 1290   272   217 1031   101    93  869   196
User Adj:    1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
PHF Adj:     1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
PHF Volume:   111 1584    87   248 1290   272   217 1031   101    93  869   196
Reduct Vol:     0    0     0     0    0     0     0    0     0     0    0     0
Reduced Vol:  111 1584    87   248 1290   272   217 1031   101    93  869   196
PCE Adj:     1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
MLF Adj:     1.00 1.00  1.00  1.10 1.00  1.00  1.10 1.00  1.00  1.00 1.00  1.00
Final Vol.:   111 1584    87   273 1290   272   239 1031   101    93  869   196
------------|---------------||---------------||---------------||---------------|
Saturation Flow Module:
Sat/Lane:    1375 1375  1375  1375 1375  1375  1375 1375  1375  1375 1375  1375
Adjustment:  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
Lanes:       1.00 3.00  1.00  2.00 3.00  1.00  2.00 2.00  1.00  1.00 2.00  1.00
Final Sat.:  1375 4125  1375  2750 4125  1375  2750 2750  1375  1375 2750  1375
------------|---------------||---------------||---------------||---------------|
Capacity Analysis Module:
Vol/Sat:     0.08 0.38  0.06  0.10 0.31  0.20  0.09 0.37  0.07  0.07 0.32  0.14
Crit Vol:          528         136                  516          93
Crit Moves:       ****        ****                 ****        ****
********************************************************************************


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```

```
Mitigation-Scenario 4 PM
------------------------------------------------------------------------------
                              BRADLEY WEST
------------------------------------------------------------------------------
                     Level Of Service Computation Report
           Circular 212 Planning Method (Base Volume Alternative)
******************************************************************************
Intersection #36 La CIENEGA BLVD. @ CENTURY BLVD
******************************************************************************
Cycle (sec):        100               Critical Vol./Cap. (X):        0.870
Loss Time (sec):      0 (Y+R =  4 sec) Average Delay (sec/veh):      xxxxxx
Optimal Cycle:      175               Level Of Service:                 D
******************************************************************************
Street Name:         La CIENEGA BLVD.                  CENTURY BLVD.
Approach:      North Bound      South Bound       East Bound       West Bound
Movement:     L  -  T  -  R    L  -  T  -  R    L  -  T  -  R    L  -  T  -  R
------------|---------------||---------------||---------------||---------------|
Control:       Prot+Permit      Prot+Permit      Prot+Permit      Prot+Permit
Rights:            Ovl              Ovl              Ovl              Ovl
Min. Green:     0    0     0     0    0     0     0    0     0     0    0     0
Lanes:        1  0  2  0  2    1  0  2  0  2    1  0  3  0  2    1  0  3  0  1
------------|---------------||---------------||---------------||---------------|
Volume Module:
Base Vol:     157  322   650   418  611   460   169 1262   833   121  790   242
Growth Adj:  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
Initial Bse:  157  322   650   418  611   460   169 1262   833   121  790   242
User Adj:    1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
PHF Adj:     1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
PHF Volume:   157  322   650   418  611   460   169 1262   833   121  790   242
Reduct Vol:     0    0     0     0    0     0     0    0     0     0    0     0
Reduced Vol:  157  322   650   418  611   460   169 1262   833   121  790   242
PCE Adj:     1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
MLF Adj:     1.00 1.00  1.10  1.00 1.00  1.10  1.00 1.00  1.10  1.00 1.00  1.00
Final Vol.:   157  322   715   418  611   506   169 1262   916   121  790   242
------------|---------------||---------------||---------------||---------------|
Saturation Flow Module:
Sat/Lane:    1375 1375  1375  1375 1375  1375  1375 1375  1375  1375 1375  1375
Adjustment:  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
Lanes:       1.00 2.00  1.00  1.00 2.00  2.00  1.00 3.00  2.00  1.00 3.00  1.00
Final Sat.:  1375 2750  2750  1375 2750  2750  1375 4125  2750  1375 4125  1375
------------|---------------||---------------||---------------||---------------|
Capacity Analysis Module:
Vol/Sat:     0.11 0.12  0.26  0.30 0.22  0.18  0.12 0.31  0.33  0.09 0.19  0.18
Crit Vol:                358   418                  421           0
Crit Moves:             ****  ****                 ****         ****
******************************************************************************
```

```
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```

```
Mitigation-Scenario 4 PM
--------------------------------------------------------------------------------
                              BRADLEY WEST
--------------------------------------------------------------------------------
                     Level Of Service Computation Report
           Circular 212 Planning Method (Base Volume Alternative)
********************************************************************************
Intersection #68 IMPERIAL HWY @MAIN STREET
********************************************************************************
Cycle (sec):        100               Critical Vol./Cap. (X):        0.802
Loss Time (sec):      0 (Y+R =  4 sec) Average Delay (sec/veh):      xxxxxx
Optimal Cycle:      115               Level Of Service:                 D
********************************************************************************
Street Name:           MAIN STREET                     IMPERIAL HWY
Approach:      North Bound      South Bound       East Bound       West Bound
Movement:     L  -  T  -  R    L  -  T  -  R    L  -  T  -  R    L  -  T  -  R
------------|---------------||---------------||---------------||---------------|
Control:       Split Phase      Split Phase       Protected        Protected
Rights:           Ignore           Include          Include          Include
Min. Green:     0    0     0     0    0     0     0    0     0     0    0     0
Lanes:        1  1  0  0  1    1  0  0  0  0    0  0  2  0  1    2  0  2  0  1
------------|---------------||---------------||---------------||---------------|
Volume Module:
Base Vol:     230    0   394    54    0     0     0 1228   302   561  988     0
Growth Adj:  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
Initial Bse:  230    0   394    54    0     0     0 1228   302   561  988     0
User Adj:    1.00 1.00  0.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
PHF Adj:     1.00 1.00  0.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
PHF Volume:   230    0     0    54    0     0     0 1228   302   561  988     0
Reduct Vol:     0    0     0     0    0     0     0    0     0     0    0     0
Reduced Vol:  230    0     0    54    0     0     0 1228   302   561  988     0
PCE Adj:     1.00 1.00  0.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
MLF Adj:     1.10 1.00  0.00  1.00 1.00  1.00  1.00 1.00  1.00  1.10 1.00  1.00
Final Vol.:   253    0     0    54    0     0     0 1228   302   617  988     0
------------|---------------||---------------||---------------||---------------|
Saturation Flow Module:
Sat/Lane:    1375 1375  1375  1375 1375  1375  1375 1375  1375  1375 1375  1375
Adjustment:  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
Lanes:       2.00 0.00  1.00  1.00 0.00  0.00  0.00 2.00  1.00  2.00 2.00  1.00
Final Sat.:  2750    0  1375  1375    0     0     0 2750  1375  2750 2750  1375
------------|---------------||---------------||---------------||---------------|
Capacity Analysis Module:
Vol/Sat:     0.09 0.00  0.00  0.04 0.00  0.00  0.00 0.45  0.22  0.22 0.36  0.00
Crit Vol:     127              54                   614          309
Crit Moves:  ****             ****                 ****         ****
********************************************************************************
```

```
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```
Mitigation-Scenario 4 AM
--------------------------------------------------------------------------------
                              BRADLEY WEST
--------------------------------------------------------------------------------
                     Level Of Service Computation Report
            Circular 212 Planning Method (Base Volume Alternative)
********************************************************************************
Intersection #69 IMPERIAL HWY @ PERSHING DR.
********************************************************************************
Cycle (sec):        100               Critical Vol./Cap. (X):        0.318
Loss Time (sec):      0 (Y+R =  4 sec) Average Delay (sec/veh):      xxxxxx
Optimal Cycle:       27               Level Of Service:                 A
********************************************************************************
Street Name:    PERSHING DR./HYPERION DWY.              IMPERIAL HWY
Approach:      North Bound      South Bound       East Bound       West Bound
Movement:     L  -  T  -  R    L  -  T  -  R    L  -  T  -  R    L  -  T  -  R
------------|---------------||---------------||---------------||---------------|
Control:       Split Phase      Split Phase        Permitted        Permitted
Rights:           Include          Include          Include          Ovl
Min. Green:     0    0     0     0    0     0     0    0     0     0    0     0
Lanes:        0  0  1! 0  0    1  1  0  1  0    2  0  1  1  0    0  1  1  0  2
------------|---------------||---------------||---------------||---------------|
Volume Module:
Base Vol:       1    0     1   575    2    43   138  250     4     8  259  1022
Growth Adj:  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
Initial Bse:    1    0     1   575    2    43   138  250     4     8  259  1022
User Adj:    1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
PHF Adj:     1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
PHF Volume:     1    0     1   575    2    43   138  250     4     8  259  1022
Reduct Vol:     0    0     0     0    0     0     0    0     0     0    0     0
Reduced Vol:    1    0     1   575    2    43   138  250     4     8  259  1022
PCE Adj:     1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
MLF Adj:     1.00 1.00  1.00  1.10 1.00  1.00  1.10 1.00  1.00  1.00 1.00  1.10
Final Vol.:     1    0     1   633    2    43   152  250     4     8  259  1124
------------|---------------||---------------||---------------||---------------|
Saturation Flow Module:
Sat/Lane:    1425 1425  1425  1425 1425  1425  1425 1425  1425  1425 1425  1425
Adjustment:  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
Lanes:       0.50 0.00  0.50  2.00 0.04  0.96  2.00 1.97  0.03  0.06 1.94  2.00
Final Sat.:   713    0   713  2850   63  1362  2850 2805    45    85 2765  2850
------------|---------------||---------------||---------------||---------------|
Capacity Analysis Module:
Vol/Sat:     0.00 0.00  0.00  0.22 0.03  0.03  0.05 0.09  0.09  0.09 0.09  0.39
Crit Vol:                 2   316                  127           8
Crit Moves:             ****  ****               ****        ****
********************************************************************************
```

```
Mitigation-Scenario 4 PM
--------------------------------------------------------------------------------
                              BRADLEY WEST
--------------------------------------------------------------------------------
                     Level Of Service Computation Report
           Circular 212 Planning Method (Base Volume Alternative)
********************************************************************************
Intersection #114 SEPULVEDA BLVD. @ MANCHESTER AVE.
********************************************************************************
Cycle (sec):        100               Critical Vol./Cap. (X):        0.916
Loss Time (sec):      0 (Y+R =  4 sec) Average Delay (sec/veh):      xxxxxx
Optimal Cycle:      180               Level Of Service:                 E
********************************************************************************
Street Name:       Sepulveda Boulevard               Manchester Avenue
Approach:      North Bound      South Bound       East Bound       West Bound
Movement:     L  -  T  -  R    L  -  T  -  R    L  -  T  -  R    L  -  T  -  R
------------|---------------||---------------||---------------||---------------|
Control:       Prot+Permit      Prot+Permit       Protected       Prot+Permit
Rights:           Include          Include          Include          Include
Min. Green:     0    0     0     0    0     0     0    0     0     0    0     0
Lanes:        1  0  3  0  1    2  0  3  0  1    2  0  2  0  1    1  0  2  0  1
------------|---------------||---------------||---------------||---------------|
Volume Module:
Base Vol:     111 1543    87   248 1279   272   217 1031   101    93  869   196
Growth Adj:  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
Initial Bse:  111 1543    87   248 1279   272   217 1031   101    93  869   196
User Adj:    1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
PHF Adj:     1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
PHF Volume:   111 1543    87   248 1279   272   217 1031   101    93  869   196
Reduct Vol:     0    0     0     0    0     0     0    0     0     0    0     0
Reduced Vol:  111 1543    87   248 1279   272   217 1031   101    93  869   196
PCE Adj:     1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
MLF Adj:     1.00 1.00  1.00  1.10 1.00  1.00  1.10 1.00  1.00  1.00 1.00  1.00
Final Vol.:   111 1543    87   273 1279   272   239 1031   101    93  869   196
------------|---------------||---------------||---------------||---------------|
Saturation Flow Module:
Sat/Lane:    1375 1375  1375  1375 1375  1375  1375 1375  1375  1375 1375  1375
Adjustment:  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00  1.00 1.00  1.00
Lanes:       1.00 3.00  1.00  2.00 3.00  1.00  2.00 2.00  1.00  1.00 2.00  1.00
Final Sat.:  1375 4125  1375  2750 4125  1375  2750 2750  1375  1375 2750  1375
------------|---------------||---------------||---------------||---------------|
Capacity Analysis Module:
Vol/Sat:     0.08 0.37  0.06  0.10 0.31  0.20  0.09 0.37  0.07  0.07 0.32  0.14
Crit Vol:          514         136                  516          93
Crit Moves:       ****        ****                 ****         ****
********************************************************************************


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Attachment 1

Original Comment Letters on the Bradley West Project Draft EIR

U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA 94607-4052

FEMA

May 26, 2009

Dennis Quilliam
Los Angeles World Airports
Facilities Planning Division
7301 World Way West, 3rd Floor
Los Angeles, California 90045-5803

Dear Mr. Quilliam:

This is in response to your request for comments on the Los Angeles City File No. AD-043-08 Draft Environmental Impact Report for the TBIT Reconfiguration Project, Also referred to as the Bradley West Project, at Los Angeles International Airport

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the City (Community Number 060137) and County (Community Number 065043), Maps revised September 26, 2008. Please note that the City and County of Los Angeles are participants in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.

- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any ***development*** must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

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- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.

- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/business/nfip/forms.shtm.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Los Angeles City floodplain manager can be reached by calling Mark Pestrella, Assistant Deputy Director, Department of Public Works, at (626) 458-5100. The Los Angeles County floodplain manager can be reached by calling George De La O, Floodplain Manager, Los Angeles County, Department of Public Works, at (626) 458-7155.

If you have any questions or concerns, please do not hesitate to call Cynthia McKenzie of the Mitigation staff at (510) 627-7190.

Sincerely,

Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

cc:
Mark Pestrella, Assistant Deputy Director, Los Angeles Public Works, City of Los Angeles
George De La O, Floodplain Manager, Los Angeles County, Department of Public Works
Garret Tam Sing/Salomon Miranda, State of California, Department of Water Resources, Southern District
Cynthia McKenzie, Senior Floodplanner, CFM, DHS/FEMA Region IX
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

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STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, OFFICE OF PUBLIC
TRANSPORTATION AND REGIONAL PLANNING
IGR/CEQA BRANCH
100 SOUTH MAIN STREET
LOS ANGELES, CA 90012
PHONE (213) 897-6696
FAX (213) 897-1337

Flex your power!
Be energy efficient!

June 22, 2009

Los Angeles International Airport
Tom Bradley International Terminal
IGR/CEQA DEIR CS/090508
Vic. LA-1-26.8, SCH# 2008121080

Mr. Dennis Quilliam
Los Angeles World Airports
7301 World Way West, 3rd Floor
Los Angeles, CA 90045

Dear Mr. Quilliam:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Report (DEIR) for the Tom Bradley International Terminal Reconfiguration Project. Based on the information received, we have the following comments:

It is anticipated that project related traffic including arobient growth in national passenger activity at the Tom Bradley International Terminal by 2013 would result in significant impacts at the following intersections that would involve State Highways.

Imperial Highway and Sepulveda Boulevard (State Route 1)
Restripe the northbound approach to the Imperial Highway and Sepulveda Boulevard intersection to provide one left turn lane, three through lanes and two right turn lanes. Implementation of this mitigation measure would reduce the impact to a less than significant level While restriping the intersection as described above would mitigate this impact, an alternative would be to widen the east side of Sepulveda Boulevard south of Imperial Highway to provide one left turn lane, three through lanes and two right turn lanes on the northbound approach. The restriping is recommended rather than the widening. In either case, the proposed mitigation measures will need a Caltrans Encroachment Permit. A Caltrans Encroachment Permit application along with a traffic study and striping plans would be needed for Caltrans review and approval. Caltrans design standards will need to be observed regarding lane widths and roadway shoulders.

La Cienega Boulevard and I-405 ramps north of Century Boulevard
Widen the southbound approach to the La Cienega Boulevard and I-405 ramps north of Century Boulevard intersection to provide two left turn lanes and two through lanes. Implementation of this mitigation measure would reduce the impact to a less than significant level. This mitigation

BWP-AS00001

measure will need a Caltrans Encroachment Permit. A Caltrans Encroachment Permit application along with a traffic study, ramp analysis and striping plans would be needed for Caltrans review and approval. Caltrans design standards will need to be observed regarding lane widths and ramp shoulders.

Lincoln Boulevard (State Route 1) and Venice Boulevard (State Route 187)
Improvements for this intersection are considered infeasible due to right-of-way constraints. This impact would be significant and unavoidable.

Lincoln Boulevard (State Route 1) and Washington Boulevard
Improvements for this intersection are considered infeasible due to right-of-way constraints. This impact would be significant and unavoidable.

Rosecrans Avenue and Sepulveda Boulevard
Improvements for this intersection is considered infeasible (State Route 1) due to right-of-way constraints. This impact would be significant and unavoidable.

Sepulveda Boulevard (State Route 1) and I-105 ramp north of Imperial Highway
Improvements for this intersection are considered infeasible due to right-of-way constraints. This impact would be significant and unavoidable.

Physical improvements to improvements to the Lincoln Boulevard and Venice Boulevard, Lincoln Boulevard and Washington Boulevard, Rosecrans Avenue and Sepulveda Boulevard, and the Sepulveda Boulevard and I-105 ramp north of Imperial Highway intersections are considered infeasible due to right-of-way constraints; impacts at these intersections would be significant and unavoidable. As noted in the CMP analysis, project traffic to mainline I-105 and I-405 freeways would be over 150 trips at various segments that currently (2008) operate deficiently or are projected to operate deficiently by 2013. This impact should be considered cumulative considerable, especially since other related projects within the airport are foreseeable.

LAX International Airport is a regional facility and future improvements and upgrades to it are expected to have regional impacts on nearby State facilities. The transportation impact analysis should have included the analysis of impacts associated with the overall master plan. We recommend the lead agency coordinate with Caltrans and prepare a comprehensive study that would determine deficiencies and improvements that would be doable. The airport could contribute on a fair share basis to those improvements. Especially, in view of the fact that the CMP debit and credit system has been suspended and therefore cumulative transportation impacts are not being mitigated.

We understand that physical improvements to mainline freeways might not be feasible to mitigate by the proposed terminal upgrade. We request that LAWA consult with Caltrans regarding fair-share contributions towards traffic mitigation improvements for State facilities or other mitigation alternatives to State highway facilities. Other mitigation alternatives may include fair-share contributions towards pre-established or future improvements on I-405

BWP-AS00001

Mr. Dennis Quilliam
June 22, 2009
Page Three

(NB HOV lane and new the SB Arbor Vitae interchange) and I-105 freeways and for State Route 1, Sepulveda Boulevard and Lincoln Boulevard.

We recommend that construction related truck trips on State highways be limited to off-peak commute periods. The contractor should avoid platooning of trucks on mainline freeways, on freeway on/off-ramps, and at freeway ramp intersections. Transport of over-size or over-weight vehicles on State highways will need a Caltrans Transportation Permit.

If you have any questions, you may reach me at (213) 897-6696 and please refer to our record number 090508/CS.

Sincerely,

ELMER ALVAREZ
IGR/CEQA Program Manager
Office of Regional Planning

cc: Scott Morgan, State Clearinghouse

BWP-AS00001

JUN-22-2009 16:31 P.004

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

ARNOLD SCHWARZENEGGER
GOVERNOR

CYNTHIA BRYANT
DIRECTOR

June 23, 2009

Dennis Quilliam
Los Angeles World Airports
7301 World Way West, 3rd Floor
Los Angeles, CA 90045

Subject: Los Angeles International Airport (LAX) Tom Bradley International Terminal (TBIT) Reconfiguration Project (Bradley West Project)
SCH#: 2008121080

Dear Dennis Quilliam:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on June 22, 2009, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

BWP-AS00002

Document Details Report
State Clearinghouse Data Base

SCH#	2008121080
Project Title	Los Angeles International Airport (LAX) Tom Bradley International Terminal (TBIT) Reconfiguration
Lead Agency	Project (Bradley West Project) Los Angeles World Airports
Type	EIR Draft EIR
Description	The Bradley West Project would involve the reconfiguration of TBIT at LAX, including new and reconfigured aircraft gates; renovation and enlargement of U.S. Customs and Border Protection concessions, office and operations areas; and westward relocation of existing Taxiways S and C.

Lead Agency Contact

Name	Dennis Quilliam
Agency	Los Angeles World Airports
Phone	310-646-7614 **Fax**
email	
Address	7301 World Way West, 3rd Floor
City	Los Angeles **State** CA **Zip** 90045

Project Location

County	Los Angeles
City	Los Angeles, City of
Region	
Lat / Long	33° 56' 38" N / 118° 24' 34" W
Cross Streets	World Way West/Center Way
Parcel No.	
Township	**Range** **Section** **Base**

Proximity to:

Highways	I-105 & I-405
Airports	LAX
Railways	
Waterways	Pacific Ocean
Schools	St. Bernards High
Land Use	Airport related airfield, LAX-A-Zone

Project Issues	Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Economics/Jobs; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Other Issues; Population/Housing Balance; Public Services; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian
Reviewing Agencies	Resources Agency; California Coastal Commission; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; Air Resources Board, Airport Projects; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission
Date Received	05/07/2009 **Start of Review** 05/07/2009 **End of Review** 06/22/2009

Note: Blanks in data fields result from insufficient information provided by lead agency.

BWP-AS00002

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June 22, 2009

Via email to dquilliam@lawa.org and bradleywestproject@lawa.org and U.S. Mail

Los Angeles World Airports
Facilities Planning Division
Attention Dennis Quilliam
7301 World Way West, 3rd floor
Los Angeles, CA 90045-5803

Re: Draft Environmental Impact Report for Los Angeles International Airport (LAX) Bradley West Project

Dear Mr. Quilliam:

We submit this letter on behalf of our client, the City of El Segundo, to comment on the Draft Environmental Impact Report ("DEIR") recently released by Los Angeles World Airports ("LAWA") for its Bradley West Project ("Project") at Los Angeles International Airport ("LAX"). The City of El Segundo has been an active participant in the LAX Master Plan process since its inception. In February of 2006, El Segundo, together with other petitioners, entered into a Stipulated Settlement Agreement with LAWA. El Segundo continues to monitor LAWA's efforts to implement the LAX Master Plan in order to ensure those efforts comply with the terms of the Master Plan and Stipulated Settlement. In keeping with that approach, and in the spirit of continued cooperation, we submit this comment letter on behalf of the City of El Segundo.

LAWA's Master Plan Implementation: To date, LAWA's principal efforts to implement the Master Plan have consisted of work on: (1) the South Airfield Improvement Program ("SAIP"), which is now complete; (2) the Crossfield Taxiway Project ("CFTP"), for which LAWA has released a final EIR; (3) the Bradley West Project addressed in the DEIR; and (4) the Specific Plan Advisory Study ("SPAS") process to identify replacements for "Yellow Light" Master Plan elements, for which progress has been exceedingly slow.

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LAWA's first project, the SAIP, was clearly identified by the Master Plan as the first "Phase I" project. As such, it was appropriate for LAWA to begin its Master Plan implementation efforts with the SAIP. By contrast, although LAWA has now elected to proceed with the CFTP and Bradley West Project, those projects are not identified by the Master Plan as "Phase I" projects. In fact, the Crossfield Taxiway and Bradley West Projects are identified as occurring within the latter part of "Phase II," after numerous other "Green Light" Master Plan projects, such as the Intermodal Transportation Center ("ITC"), Consolidated Rent-A-Car Center ("ConRAC"), Automated People Mover ("APM"), West Employee Parking Garage, and Ground Run-Up Enclosures ("GREs").

It would therefore appear that LAWA is either proceeding with the Master Plan significantly out of order (temporarily skipping over certain elements) or permanently dropping certain elements of the Master Plan. Either approach is problematic because elements such as the ITC, APM, ConRAC and GREs were included in the LAX Master Plan to address problems such as traffic, noise and air pollution associated with the Master Plan as a whole. Deleting or delaying those Master Plan elements would represent significant project changes and substantially undermine the accuracy and applicability of the analysis in the Master Plan EIR. Having committed to implement environmentally beneficial projects as part of the Master Plan according to an established sequence, LAWA cannot now abandon those projects and/or delay them indefinitely. By proceeding with the CFTP and Bradley West Projects prior to the ITC, APM, ConRAC, GREs and other similar projects, it appears LAWA may be doing just that.

We raised this issue in El Segundo's comments on the Notice of Preparation ("NOP") for the Bradley West Project, and asked LAWA to respond. Although the DEIR includes several pages of discussion regarding the LAX Master Plan (DEIR at 1-2 through 1-11 and 2-2), it contains no meaningful response to El Segundo's comment. The closest the DEIR comes to responding is its statement that "The SAIP, the CFTP, and the Bradley West Project are only three of numerous improvements contemplated in the approved LAX Master Plan. As noted above, the nature, scope, and timing of implementing the various improvements at LAX take into account a number of considerations including the relationship of a proposed improvement to existing and future facilities at LAX." (DEIR at 1-10.) What LAWA seems to be saying with this statement is that it does not intend to follow the project phasing plan contained in the approved LAX Master Plan and may even abandon certain environmentally beneficial projects. LAWA cannot, however, legally depart from the approved Master Plan in this substantial way without formally amending that plan and conducting the necessary CEQA analysis. Put another way, LAWA cannot continue to tier off the LAX Master Plan EIR if it is no longer proceeding in a manner consistent with the Master Plan.

ADG VI Gates and Operations: The NOP and DEIR make clear that LAWA is undertaking the Bradley West Project to increase dramatically LAX's ability to accommodate next generation Airplane Design Group VI ("ADG VI") Aircraft such as the Airbus A380. Specifically, the

Project will provide facilities that are large enough and specially configured to accommodate large "ADG VI" aircraft. More importantly, those facilities will be provided as contact gates within the Tom Bradley International Terminal ("TBIT"), rather than in the distant and inconvenient Western Remote Gates.

In our comments on the NOP, we noted that the number of ADG VI gates proposed as part of the Bradley West Project appears to exceed the total number of ADG VI gates anticipated in the Master Plan. Whereas the Master Plan proposed a total of only six (6) such gates (*see* LAX Master Plan Tables 2.2-1 & 2.2-2), the DEIR calls for a total of nine (9) ADG VI gates (with other ADG VI gates operating elsewhere at LAX, including at the Western Remote Gates). (DEIR at 2-4, Figures 2-1, 2-2.) LAWA has not yet responded to our request for an explanation of this apparent departure from the approved LAX Master Plan. We renew our request for such an explanation and note that LAWA cannot properly rely on the CEQA analysis conducted for the LAX Master Plan if its projects are not consistent with that plan.

The addition of facilities specifically designed for ADG VI aircraft will naturally tend to encourage airlines to increase ADG VI aircraft operations at LAX. (*See* DEIR at 2-44 through 2-45 (explaining that if LAWA does not provide such facilities, airlines will use "smaller gauge aircraft" at LAX).) Although the City of El Segundo recognizes that there are potential benefits associated with increased Airbus A380 operations, it is also concerned that such an increase in Airbus A380 operations will increase the incidence of preferential runway policy violations by Airbus A380s departing from Runway 25L.

As LAWA's recent environmental documents for its Crossfield Taxiway Project make clear, LAWA anticipates that ADG VI aircraft such as the Airbus A380 will routinely violate the longstanding preferential runway policy[1] in place at LAX, by departing from the runway closest to El Segundo (Runway 25L). (*See* CFTP DEIR at 2-12 fn 7.) Prior to departure, ADG VI aircraft will also apparently use Taxiway A, which is located even closer to El Segundo than Runway 25L. ADG VI aircraft departures from Runway 25L, and the associated use of Taxiway A, will impose substantial adverse impacts on El Segundo residents, including increased noise and air pollution. LAWA must evaluate and make every reasonable effort to avoid and reduce those impacts.

Unfortunately, the DEIR ignores El Segundo's request, made in its NOP comments, that LAWA fully evaluate the impacts on El Segundo associated with the increased preferential runway policy violations that would result from proceeding with the Bradley West Project now and including such a large number of ADG VI aircraft gates within that project, thereby

[1] The purpose of the preferential runway policy is to place arrivals on LAX's outboard runways (Runways 25L and 24R) and place noisier departures on LAX's inboard runways (Runways 25R and 24L), farther from the communities north and south of the airport.

encouraging increased use of ADG VI aircraft at LAX before the airport has appropriate airfield facilities to accommodate the aircraft.

LAWA cannot properly rely on the programmatic analysis conducted in the Master Plan EIR as it does not cover this issue. Although the Master Plan may have assumed that ADG VI aircraft would temporarily depart from Runway 25L (in violation of the preferential runway policy) for a period of time prior to the construction of the north airfield improvements, the Master Plan should also have assumed that compliance with the preferential runway policy would be restored following the completion of those improvements. The Bradley West Project DEIR must therefore look at the impacts to El Segundo that would result from the combination of encouraging ADG VI aircraft operations through implementation of the Bradley West Project, while delaying implementation of airfield improvements that would allow ADG VI aircraft to operate consistent with the LAX preferential runway policy. Moreover, LAWA must evaluate the additional impacts to El Segundo associated with the proposal to increase the number of ADG VI aircraft gates provided at LAX above the six (6) evaluated as part of the Master Plan.

Finally, LAWA should focus on ensuring that other Master Plan improvements come on line to address the problem of ADG VI aircraft departures from Runway 25L. Most importantly, LAWA must proceed expeditiously with the SPAS process to identify and implement north airfield improvements to replace those that received a "Yellow Light" in the Master Plan process. LAWA should also evaluate measures designed to reduce the incidence of such violations. Specifically, LAWA should work with FAA to identify operational changes and airfield modifications to address the problem. LAWA should undertake an exhaustive effort to identify operational modes that would allow ADG VI aircraft to arrive, taxi and depart without violating LAX's longstanding preferential runway policy. This may mean restricting other aircraft operations during ADG VI aircraft arrivals, taxiing and departures. LAWA may also need to seek variances from FAA for certain separation standards, as it has done elsewhere at LAX.

Remote Commuter Gates: The approved LAX Master Plan clearly calls for the elimination of the remote commuter terminals historically used by American Eagle and United Express, and plans for commuter aircraft to instead be accommodated at contact gates in the Central Terminal Area. This aspect of the Master Plan is relevant because the Bradley West Project would involve demolition of the commuter terminal historically used by American Eagle.

The DEIR indicates that American Eagle's commuter flights would be relocated to the commuter terminal historically used by United Express. (*See* DEIR at 2-38, Figure 2-7.) Elsewhere, the DEIR explains that LAWA plans to upgrade the commuter terminal historically used by United Express by, among other things, installing jetways that will convert seven of the existing aircraft parking places from hard-stand to contact gates. (DEIR at 3-7.)

LAWA's proposal for dealing with these commuter gates is problematic for a number of reasons. First, because the LAX Master Plan clearly calls for the elimination of remote commuter gates, American Eagle commuter flights should be relocated to contact gates in the Central Terminal Area, not another remote facility. Likewise, upgrading the commuter terminal historically used by United Express is patently inconsistent with the Master Plan, which calls for its elimination, not improvement.

Moreover, LAWA is clearly proposing significant modifications to the remote commuter facility in order to accommodate relocation of American Eagle commuter flights to that location. Those upgrades, if they are to occur in contravention of the Master Plan, must be considered part of the Bradley West Project and be evaluated as such. LAWA cannot argue that its modifications to the commuter terminal historically used by United Express have utility independent of the Bradley West Project because that facility has not been used by United Express for many years and there would be no reason to modify the facility were it not for the relocation of American Eagle as part of the Bradley West Project.

Finally, the DEIR indicates that LAWA intends to proceed immediately with these proposed commuter terminal modifications, but LAWA has not engaged in any environmental review or public process regarding those modifications. This is clearly improper.

Busing Facilities: The DEIR includes incomplete, inconsistent and confusing information regarding the busing facilities that would be provided at TBIT and used to ferry passengers to and from remote gates at the west end of LAX. For example, the DEIR states that "existing bus gates would be replaced by a 28,400-square-foot busing operations hold room...at the northern end of the existing north concourse." (DEIR at 2-11.) Given that the existing bus gate area at TBIT measure only 17,120 square feet (*see* DEIR Table 2-1), it appears that the Bradley West Project would approximately double the amount of space devoted to bus gates. LAWA's proposal to increase bus holdroom space so dramatically is mystifying in light of the fact that one of the stated goals of the Bradley West Project is to "reduce the need for, and use of, the existing remote gates for international flights." (DEIR at 2-11.)

The DEIR implies that the massive increase in bus holdroom space may be temporary and could be reversed later "to reflect the reduced need for busing." *Id.* The DEIR does not, however, explain why LAWA would need more busing space in the future (even temporarily) when it will have more contact gates and use the remote gates less.[2] With that in mind, LAWA

[2] The DEIR indicates that "the proposed new contact gates on the west side of TBIT would reduce the need for busing passengers between the existing gates at the West Remote Pads and TBIT" but nonetheless concludes that "with the forecast increase in international operations between 2008 and 2013, the total daily bus trips would still increase from 113 in 2008 to 160 in 2013. (Without the Bradley West Project, the number would increase to 273 daily bus

should scale back its proposed busing facilities. If it does not do so, the public will properly question whether LAWA is indeed committed to reducing use of the remote gates as it claims. Moreover, if any of the busing space is indeed intended to be temporary, LAWA must identify a clear timeline for its removal/reconfiguration. In the absence of such a timeline, the facilities must be considered permanent for purposes of CEQA and LAX Master Plan consistency analysis.

At the end of the north concourse, DEIR Figures 2-4 include a 38,681 square foot area labeled "Bus Gates" on level 3 with an open area above (on level 4) and miscellaneous related uses ("Departure Lounge", "Concession", etc.) below (on level 2). DEIR Figure 2-4b also shows a separate 11,657 square foot "Bus Gate Holdroom" to be constructed on level 2 near the center of the terminal. The sum of these areas apparently dedicated to bus gates on levels 2 and 3 is substantially larger than (and configured differently from) the 28,400-square-foot area discussed in the text of the DEIR. (DEIR at 2-11.) The reason for this inconsistency is not clear and must be addressed. Additionally, the DEIR offers no explanation regarding why LAWA proposes to construct two separate busing facilities as part of the Bradley West Project.

Western Remote Gates: The NOP indicates that as additional gates are constructed as part of the Bradley West Project, LAWA will no longer need to use some of the existing remote gates located in the western portion of the airport ("Western Remote Gates"), which are currently accessed by bus. As part of the Master Plan, LAWA indicated that the boarding facilities associated with the Western Remote Gates would be demolished once they were replaced by contact gates and no longer needed. (*See* Final LAX Master Plan EIR at 3-75 ("The Tom Bradley International Terminal (TBIT) would be reconfigured with the addition of a new north/south linear concourse on the west side of the existing building. The remote gates at the west pad facility would be eliminated and this area would be prohibited from use as a remote passenger boarding location.").)

Consistent with this commitment, LAWA should identify specific Western Remote Gates boarding facilities for elimination as part of the Bradley West Project. Doing so is necessary to demonstrate LAWA's commitment to faithful implementation of the Master Plan and full compliance with the gate constraints contained in the Stipulated Settlement. By contrast, failing to remove boarding facilities and simply redesignating Western Remote Gates as Remain Overnight ("RON") aircraft parking, as the DEIR indicates, sends the wrong message.[3]

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trips.)" (DEIR at 2-47.) These projections regarding increased busing demand are at odds with recent industry trends and with LAWA's own assertion that airlines would use smaller gauge aircraft at LAX to avoid using the remote gates if the project Bradley West Project is not built.

[3] LAWA has not pointed to any evidence that LAX suffers from a shortage of RON aircraft parking. Moreover, the provision of new RON spots is not an identified goal of the

West Aircraft Maintenance/Aircraft Parking Area: The DEIR indicates that LAWA is proposing to construct a maintenance area for the Airbus A380 at the far west end of LAX on a 60-acre site located west of taxiway AA, east of Pershing Drive and south of World Way West. (DEIR at 3-8.) This is the same general area identified as the "West Construction Staging Area" in the DEIR and identified in the Master Plan for eventual development with an Employee Parking Lot. Developing this site as a massive aircraft maintenance area as LAWA apparently proposes would put additional maintenance operations close to El Segundo residences, exposing them to additional noise and air pollution. This proposal is a totally unacceptable departure from the LAX Master Plan, which clearly envisions a reduction, not an increase, in aircraft maintenance activities at LAX. (Master Plan FEIR at 3-78.) Likewise, the proposed site is not identified by the Master Plan for development as an aircraft maintenance area. (LAX Master Plan at 2-95, Figure 2.6-1.)

Moreover, although the DEIR does not acknowledge this fact, it appears that LAWA's proposal to develop the "West Construction Staging Area" as an aircraft maintenance area may be one of the reasons the DEIR identifies the need for other construction staging areas, including the Continental City site, in connection with the Bradley West Project. As El Segundo made clear in its NOP comments, construction activities should be focused at the west end of the airport, not the Continental City site.

APM Station: As we mentioned in our comments on the NOP, LAWA's adopted Master Plan calls for construction of an Airside APM station in the Tom Bradley International Terminal. (*See* LAX Master Plan Figure 2.4-6.) However, neither the NOP nor the DEIR makes any mention of such a station or how it will be integrated into the Bradley West Project. The DEIR does indicate that a portion of the APM system included in the Master Plan was designated a "Yellow Light" project and is being reevaluated as part of the SPAS Process. The APM component envisioned for TBIT is not, however, a "Yellow Light" project, but rather an approved portion of the Master Plan. LAWA must, therefore, implement the Bradley West Project in a manner consistent with eventual construction of that APM system. Abandoning the APM system would constitute a substantial deviation from the Master Plan and violate CEQA.

Terminal 4: DEIR Figure 2-2 notes that the centerline of the existing taxiway C10 between Terminal 4 and TBIT will be moved west as a result of the Bradley West Project. Please explain whether this movement will, in turn, provide more room for aircraft on the west side of Terminal 4, allowing it to accommodate larger aircraft on that side.

Figures Unclear: Some of the figures included in the DEIR contain details that should be explained in the document. Several of the areas of concern are discussed above under the

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Bradley West Project.

"Busing Facilities" heading. Additionally, we note that DEIR Figure 2-2 includes a 75' wide rectangular shaded area between aircraft positions S9 and S7. This shaded area is not labeled, but should be. Given its location (directly west of an area marked "Bus Gate Holdroom" in Figure 2-4b), it appears possible that this shaded area is intended as a bus staging/boarding area. Please explain if that is the case, and if so, why LAWA is proposing to include two separate bus holdroom/gate areas in the Bradley West Project. Similarly, DEIR Figure 2-2 includes the labels "Future VSR" and "Existing APRL", but does not define or explain those terms. DEIR Figure 2-7 indicates that the existing "American Airlines Low Bay Hangar" will be relocated to New Site 17 and labels two different spots as 17. One of those two site is the new United Airlines Cargo facility and may have been labeled 17 in error. Please clarify.

Airfield Balance: The City of El Segundo is interested in ensuring that aircraft operations at LAX are balanced between the north and south airfields. The need for balance is particularly important for large aircraft ("heavies"), which have historically used the south airfield (close to El Segundo) more than the north airfield. In our comments on the NOP, we encouraged LAWA to take the need for north-south airfield balance into consideration when it designs and analyzes the proposed Bradley West Project. We repeat that request here and note with disappointment that the DEIR does not address this issue directly.

Transportation Impacts: The significant operational traffic impacts most relevant to El Segundo are at Aviation Blvd. and Imperial Highway (Intersection #16); Imperial Highway and Sepulveda Blvd (Intersection #71); Rosecrans Ave. and Sepulveda Blvd. (Intersection #125); and Sepulveda Blvd. and I-105 WB Ramp N/O Imperial (Intersection #139). (DEIR Table 4.2-6.) The mitigation measures proposed for Intersections 16, 125, and 139 are dismissed as "infeasible due to right-of-way constraints." (DEIR at 4-159 to 4-161.) However, these constraints are not detailed or explained in a manner that would permit the public to review and evaluate LAWA's conclusion. Please provide this information.

The proposed mitigation for Intersection #71 is described as feasible and is predicted to reduce the impact to a less-than-significant level. (DEIR at 4-161 to 4-162.) However, the DEIR does not present any evidence that this mitigation would be sufficient, and fails to analyze any potential indirect impacts of the recommended mitigation measure. Please correct these deficiencies.

Please explain why different lists of intersections are studied in the operational and construction transportation chapters. (*Compare* DEIR 4-100 to 101 with 4-180.)

Construction Traffic: Under all four construction parking scenarios, El Segundo will be heavily burdened by construction traffic, which has air quality and noise impacts in addition to adding to traffic congestion. (*See* Figure 4-3.4.) The DEIR predicts that even those vehicles accessing the Northwest Construction Parking/Staging Area will travel on Imperial Highway and on sections

of I-105 and I-405 bordering El Segundo. As mitigation for these impacts, and in the interest of fairly distributing impacts to surrounding communities, LAWA should require a set proportion of construction traffic to use routes that do not impact El Segundo. Additionally, it should be noted that Imperial Highway is currently in a state of disrepair due to deferred maintenance and heavy truck use, particularly in connection with LAX. LAWA should therefore provide for the repaving/reconstruction of Imperial Highway as needed to accommodate the heavy construction truck traffic associated with the Bradley West Project.

Construction parking Scenarios 3 and 4 assume a temporary 60% surge in construction employee parking demand, and allocate that demand among the Southeast and Northwest Construction Parking/Staging Areas, with 63% going to one area and 37% to the other. (DEIR at 4-173.) However, there is no mechanism in place to ensure that one of these areas is not burdened by 100% of the surged demand. A mitigation measure should be added to cap the number of construction employees who can use a single parking area at 601, the number analyzed in the DEIR.

Please explain the discrepancy between: (1) Figure 4.3-6, which indicates that the West Construction Staging Area (referred to as location F in Figure 4.3-6) is one of the parking and staging locations for the Bradley West Project, and (2) the analysis in Chapter 4.3 of the DEIR, which only discusses the Northwest Construction Parking/Staging Area, Southeast Construction Parking/Staging Area, and East Contractor Employee Parking Area.

The cumulative construction traffic impact analysis omits any assessment of construction parking Scenarios 1 and 2. (DEIR at 4-221.) The DEIR reasons that Scenarios 3 and 4 represent the worst-case conditions, and therefore does not do the analysis for Scenarios 1 and 2. But an assessment of Scenarios 1 and 2 would still be useful to provide decision-makers with an understanding of the relative merits of those two scenarios. Please provide this analysis.

Both of the significant construction traffic impacts identified in the DEIR are relevant to El Segundo: Imperial Highway and Main Street (Intersection #68) and Imperial Highway and Pershing Drive (Intersection #69). The proposed mitigation for these intersections is described as feasible and is predicted to reduce the impact to a less-than-significant level. (DEIR at 4-228.) However, the DEIR does not present any evidence that this mitigation would be sufficient, and fails to analyze any potential indirect impacts of the recommended mitigation measures. Please correct these deficiencies.

The following sentence appears on page 4-228 of the DEIR: "As stated in Section 4.3.8.2 above, neither of these mitigation measures would be needed under employee parking Scenario 2." Our review of Section 4.3.8.2 indicates that it does not so state. Please correct this. In any event, even if the impacts are somewhat less under Scenario 2, LAWA should still implement the identified mitigation measures.

Air Quality Impacts: Despite identifying multiple significant air quality impacts stemming from both construction and operational stages of the Project (DEIR at 4-269), the DEIR proposes no project-specific mitigation measures for these air quality impacts. (DEIR at 4-274.) Instead, the DEIR relies on two mitigation measures identified for the LAX Master Plan, MM-AQ-1 (LAX Master Plan - Mitigation Plan for Air Quality) and MM-AQ-2 (Construction-Related Measure). (DEIR at 4-254.) LAWA must ensure that these two measures are enforceable conditions of the Bradley West Project - as it currently stands, it is not clear that these measures are required to be incorporated into the Bradley West Project. Moreover, the status of the Master Plan - Mitigation Plan for Air Quality in unclear. The Bradley West DEIR states that LAWA is still working to define the framework of this plan (DEIR at 4-254) but page 20 of the 2008 LAX Master Plan Annual Progress Report states that the Mitigation Plan for Air Quality was completed in December 2005. Neither document sheds any light on what this Mitigation Plan for Air Quality might include. Thus, it is inappropriate for the Bradley West DEIR to rely on a vague "plan to plan" as one of only two mitigation measures for air quality. Instead, specific measures should be identified in this EIR to mitigate this Project's air quality impacts.

Noise Impacts: As noted above, El Segundo has requested that LAWA evaluate the impacts on El Segundo associated with the increased preferential runway policy violations that would result from proceeding with the Bradley West Project and thereby encouraging increased use of ADG VI Aircraft (also know as New Large Aircraft or NLA) before the airport has the appropriate airfield facilities to accommodate those NLA. The DEIR Noise chapter responds: "the operation characteristics of NLA at LAX, as related to which runways are used for departures, are based on FAA standards and decisions by the FAA Air Traffic Control Tower (ATCT) completely independent of the Bradley West Project." (DEIR at 4-364.) Apparently, LAWA contends that it need not analyze the potential for increased use of Runway 25L for departures because such use is not within its control. That is not how CEQA works. The lead agency must analyze all reasonably foreseeable consequences of its project, whether or not they are within its control. We reiterate our request that LAWA evaluate and mitigate the impacts on El Segundo associated with the increased preferential runway policy violations that would result from proceeding with the Bradley West Project before the airport has the appropriate airfield facilities.

The DEIR casually mentions in the Noise chapter that a materials processing plant (including a rock crushing plant and a concrete batch plant) "may" be located in the Southeast Construction Staging/Parking Area. (DEIR at 4-376.) It is inappropriate to locate such a loud project component near El Segundo if there are any other locations available. LAWA should not approve this option.

Alternatives: Thank you for including Alternative 4 (Construction Staging/Parking Areas – Optimize Use of West Construction Staging Area to Include Worker Parking) in the DEIR. El Segundo encourages LAWA to adopt this alternative, which better protects residential neighborhoods from Project impacts.

The DEIR states that if Alternative 4 is adopted, the other staging areas might still be needed occasionally, so this alternative would include a requirement in construction contract documents that workers do not use specified residential streets to access the Northwest Construction Staging/Parking Area. DEIR at 6-10. A requirement that similarly prevents construction workers from using residential streets in El Segundo to access construction staging/parking areas should be included in construction contract documents.

Thank you for providing this opportunity to comment on the DEIR for the Bradley West Project. Please feel free to contact us should you have questions about any of the foregoing comments.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

OSA L. WOLFF
JEANNETTE M. MACMILLAN

[P:\ELS\FGT\NTBIT & MSC\DEIR\El Segundo Comment Letter (Final).wpd]

CITY OF LOS ANGELES
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June 22, 2009

Roger A. Johnson, Deputy Executive Director
Los Angeles World Airports
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Attention: Dennis Quilliam

DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) FOR THE TOM BRADLEY INTERNATIONAL TERMINAL (TBIT) RECONFIGURATION PROJECT/BRADLEY WEST PROJECT AT LOS ANGELES INTERNATIONAL AIRPORT (STATE CLEARINGHOUSE NO. 2008121080)

Dear Mr. Johnson:

The City of Los Angeles Department of Transportation (LADOT) has reviewed the Draft Environmental Impact Report (DEIR) for the Tom Bradley International Terminal (TBIT) Reconfiguration Project, also referred to as the Bradley West Project, at Los Angeles International Airport (LAX) and offers the following comments:

Volume 1 (Main Document), Section 4.2.3.2, page 4-101: Intersection #162 should be changed from Sepulveda Boulevard and Rosecrans Avenue to Sepulveda Boulevard and Manhattan Beach Boulevard.

Volume 1, Section 4.2.3.2, page 4-102: The intersection of Sepulveda Boulevard and Manhattan Beach Boulevard (Intersection #162) should be added to the exception list for LADOT's Adaptive Traffic Control System (ATCS).

Volume 1, Figure 4.2-3d, Existing (2008) Traffic Volumes: The traffic volume and turning movement diagram for the CMP Arterial Monitoring Station intersection of La Cienega Boulevard and Jefferson Boulevard (Intersection #200) should be added to Figure 4.2-3d. Similar diagrams for this intersection should be added to Figure 4.2-4d ("Future (2013) With Project Traffic Volumes"), Figure 4.2-5d ("Future-Adjusted (2013) Without Project Traffic Volumes") and figures for any other project scenarios where this omission occurs.

Volume 3, Appendix C-3, Aviation Boulevard and Imperial Highway (Intersection #16): The lane configuration for Existing Conditions (Year 2008) for the southbound approach to the Aviation Boulevard and Imperial Highway intersection should be revised to match that shown for Future Conditions (Year 2013) since the lanes have already been

reconfigured i.e. the two left-turn lanes, (single) through lane, through/right-turn lane and right-turn lane should be changed to two left-turn lanes, two through lanes and one right turn lane. All intersection capacity analysis effected by this correction should be revised accordingly and corresponding mitigation measures and potential improvements should be identified and evaluated for any anticipated significant impacts.

Volume 3, Appendix C-3, Sepulveda Boulevard and Imperial Highway (Intersection #71): The lane configuration for Existing Conditions (Year 2008) for the westbound approach to the Sepulveda Boulevard and Imperial Highway intersection should be revised to match that shown for Future Conditions (Year 2013) since the lanes have already been reconfigured i.e. the two left-turn lanes, three through lanes and one right-turn lane should be changed to two left-turn lanes, two through lanes and two right-turn lanes. All intersection capacity analysis effected by this correction should be revised accordingly and corresponding mitigation measures and potential improvements should be identified and evaluated for any anticipated significant impacts.

Volume 3, Appendix C-3, Lincoln Boulevard and Jefferson Boulevard (Intersection #78): The lane configuration for Existing Conditions (Year 2008) for the southbound, eastbound and northbound approaches to the Lincoln Boulevard and Jefferson Boulevard intersection should be revised to match that shown for Future Conditions (Year 2013) since the lanes have already been reconfigured i.e. the southbound approach should have two left-turn lanes, three through lanes and one through/right-turn lane; the eastbound approach should have one left-turn lane, two through lanes and one through/right-turn lane; and the northbound approach should have one left-turn lane, four through lanes and one right-turn lane. All intersection capacity analysis effected by this correction should be revised accordingly and corresponding mitigation measures and potential improvements should be identified and evaluated for any anticipated significant impacts.

Volume 4, Appendix C-5, page 4, La Cienega Boulevard and Imperial Highway (Intersection # 67): The AM peak vehicle counts for Existing Conditions do not match those shown in Volume 1 (Main Document), Figure 4.2-3b; similar errors occur with the Mid-day and PM peak vehicle counts. All intersection capacity analysis effected by these errors should be revised accordingly and corresponding mitigation measures and potential improvements should be identified and evaluated for any anticipated significant impacts. If similar errors occur for other project scenarios (e.g. "No Project," "Plus Project" etc.) then capacity analysis calculations and any resulting potential mitigation measures should be also revised accordingly.

Volume 4, Appendix C-5, page 8, Lincoln Boulevard and Mindanao Way (Intersection #107): The eastbound AM left-turn vehicle count for Existing Conditions is not reflected in Volume 1, Figure 4.2-3c. Any similar omissions for Mid-day and PM peak eastbound left-turn counts and for other project scenarios should be corrected as needed.

Volume 4, Appendix C-5, page 8, Sepulveda Boulevard and Lincoln Boulevard (Intersection #108): The V/C calculation result is missing from the data summary sheet.

Volume 4, Appendix C-5, page 8, Lincoln Boulevard and Venice Boulevard (Intersection #109): The eastbound AM left-turn vehicle count for Existing Conditions does not match the count shown in Volume 1, Figure 4.2-3c; similar errors occur with the Mid-day and PM peak eastbound left-turn counts. All intersection capacity analysis effected by these errors should be revised accordingly and corresponding mitigation measures and potential improvements should be identified and evaluated for any anticipated significant impacts. If similar errors occur for other project scenarios (e.g. "No Project," "Plus Project" etc.) then capacity analysis calculations and any resulting potential mitigation measures should also be revised accordingly.

Volume 4, Appendix C-5, page 9, Lincoln Boulevard and Washington Boulevard (Intersection # 110): The AM peak vehicle counts for Existing Conditions do not match those shown in Volume 1, Figure 4.2-3c; similar errors occur with the Mid-day and PM peak vehicle counts. All intersection capacity analysis effected by these errors should be revised accordingly and corresponding mitigation measures and potential improvements should be identified and evaluated for any anticipated significant impacts. If similar errors occur for other project scenarios (e.g. "No Project," "Plus Project" etc.) then capacity analysis calculations and any resulting potential mitigation measures should also be revised accordingly.

Volume 4, Appendix C-5, page 9, Lincoln Boulevard and 83rd Street (Intersection #111): The AM peak vehicle counts for Existing Conditions do not match those shown in Volume 1, Figure 4.2-3c; similar errors occur with the Mid-day and PM peak vehicle counts. All intersection capacity analysis effected by these errors should be revised accordingly and corresponding mitigation measures and potential improvements should be identified and evaluated for any anticipated significant impacts. If similar errors occur for other project scenarios (e.g. "No Project," "Plus Project" etc.) then capacity analysis calculations and any resulting potential mitigation measures should also be revised accordingly.

If you have any questions, please call me at (213) 972-8406 or Michael May of my staff at (213) 485-1062.

Sincerely,

Jay W. Kim,
Principal Transportation Engineer

MTM:mtm
LAX Bradley West (TBIT) DEIR.doc

c: Councilmember Bill Rosendahl, Eleventh Council District
Betsy Wesiman, Department of City Planning

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June 22, 2009

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Re: Draft Environmental Impact Report - Los Angeles International Airport (LAX) Bradley West Project (City Clerk No. AD-043-08)

Dear Mr. Quillam:

The following are the comments of the Cities of Inglewood and Culver City ("Cities") concerning the referenced Draft Environmental Impact Report ("DEIR") for the Bradley West Project, formerly known as the Los Angeles International Airport (LAX) Tom Bradley International Terminal ("TBIT") Reconfiguration Project. Cities submit these comments in a spirit of cooperation and in the expectation that the matters raised will help to inform LAWA as to those issues which are most likely to be legally questionable.

I. THE "TIERING" OF THE NOP ON THE "APPROVED MASTER PLAN" RESULTS IN IMPROPERLY ATTENUATED ENVIRONMENTAL REVIEW.

The DEIR justifies its attenuated environmental review, on the basis that, as a part of "the LAX Master Plan EIR" adequate environmental review has already been completed during the prior Master Plan environmental review process, and therefore the EIR for the Bradley West Project need primarily address "five categories of environmental resources [that] could potentially be affected by construction of the project." DEIR, p. 1-12. Cities disagree.

It is true that CEQA requires, in pertinent part, that "environmental impact reports shall be tiered whenever feasible . . .", *Public Resources Code* § 21093(b). However, the utility of tiering is limited to those situations in which individual projects are consistent with the larger project that has already been environmentally reviewed.[1] In this case, the "first tier" project or "programmatic EIR" against which the Bradley West Project is being measured for the purpose of tiering, *i.e.*, the LAX Master Plan Environmental Impact Report ("Master Plan EIR") has changed dramatically since its original certification by virtue of the Stipulated Settlement.

Public Resources Code § 21094 allows a lead agency to use a tiered environmental impact report for a later, *i.e.*, "second tier", project under certain specified conditions. However, § 21094 applies only to later projects that are not subject to *Public Resources Code* § 21166. [*Pub.Res. Code* § 21094(b)] *Public Resources Code* § 21166 provides, in part, that no subsequent or supplemental environmental report shall be required unless:

(a) substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report [*Pub.Res. Code* § 21166(b)], or

(b) new information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available. [*Pub.Res. Code* § 21166(c)].

First, there have been substantial changes in the circumstances under which Bradley West Project is being undertaken. Central to the Master Plan was the development of an off-site check-in facility and associated baggage tunnel, the Automated People Mover from the check-in facility to the Central Terminal Area ("CTA"), demolition of CTA Terminals 1, 2 and 3, elimination of parking in the CTA and movement to off-site parking facilities with associated improvements to on-site roadways. These projects are now defunct. In their place, LAWA is pursuing as yet undetermined Specific Plan projects, which are currently being evaluated under a separate EIR. *See,* DEIR p. 1-1.

1 "Tiering is a process by which agencies can adopt programs, plans, policies, or ordinances with EIRs focusing on 'the big picture' and can then use streamlined CEQA review for individual projects that are consistent with such . . . [first tier decisions] . . ." *Koster v. County of San Joaquin*, 47 Cal.App.4th 29, 36 (1996). [Emphasis added.]

There is no doubt, however, that the replacement of the original Master Plan projects are likely to have environmental impacts different from those of the first tier project. For example, elimination of off-site check-in and maintenance of Terminals 1 through 3 in the CTA, as well as parking, will result in additional vehicle traffic and emissions not contemplated in the first tier project. As a consequence, the air quality impacts of the Bradley West Project are, impermissibly, being evaluated in the vacuum left by changes in the Master Plan EIR.

Moreover, this information was not known, and could not have been known, when the programmatic EIR was certified, because the stipulated Settlement Agreement which mandated material changes in the project did not occur until nine months after the EIR certification.

Thus, there have been substantial changes in the circumstances under which the Bradley West Project is being carried out, and new, previously unknown information about the LAX Master Plan is now available. Therefore, tiering is inappropriate here, and an independent environmental review of the Bradley West Project is required.

II. THE BRADLEY WEST PROJECT HAS MANIFEST CAPACITY-ENHANCING POTENTIAL THAT HAS NOT BEEN ANALYZED.

The dramatic revisions to the Master Plan project that have occurred since its original approval reveal that the Bradley West Project's capacity enhancing potential remains unanalyzed. Specifically, the DEIR indicates that, after construction of the new TBIT, there will be a net increase of 7 aircraft gates:

- Nine gates will be added on the west side of TBIT. DEIR, p. 2-3.
- Nine gates to be constructed along the east side of TBIT. *Id.*
- The 11 gates that currently exist at TBIT will be eliminated (one of the current gates will be retained). *Id.*

The DEIR does not reveal, however, the way in which this increase will comply with the Judgment Pursuant to Stipulated Settlement in the case of *El Segundo, et al. v. City of Los Angeles, et al.*, Riverside County Superior Court No. RIC426822 ("Stipulated Settlement"), that requires LAWA to reduce by 10 the number of Narrow Body Equivalent gates ("NBEG") by 2015 (*i.e.*, from 163 to 153). *See,* Stipulated Settlement, § IV.B.1 ("By December 31, 2015, the total number of passenger gates (including remote gates) shall be reduced to no more than 153 passenger gates").

The Stipulated Settlement contemplates that the reduction in the number of gates will be achieved "through the build out of improved contact passenger gate facilities and the elimination of remote gate facilities as approved in FAA's ROD." Stipulated Settlement, § IV.B.1. However, the DEIR does not indicate how the additional 7 gates to be constructed by the Bradley West Project will be offset.

Although the DEIR states that "the new gates [constructed] along the west side at TBIT would reduce the need for, and use of, the existing remote gates for international flights" (DEIR, p. 2-11), it does not state that the remote gates will be "eliminated" as the Stipulated Settlement contemplates. Instead, the DEIR states that the remote gates "would be more available to be used for Remain Overnight (RON) aircraft parking. DEIR, p. 2-11. This statement, when taken with the statement in the NOP that after the construction of the additional gates, the existing remote gates would "continue other existing functions such as use of remote gates by aircraft that do not process passengers through TBIT, military and dignitary aircraft operations, etc."[2] (NOP, p. 5) leave substantial questions with respect to the fate of the remote gates. Indeed, the DEIR at p. 4-364 specifically states that "with the Bradley West Project the number of daily operations that would be accommodated at the West Remote Pads would be reduced to 56," DEIR, p. 4-364, thereby indicating a *reduction* in use of the West Remote Pads, not *elimination*. Thus, although the remote gates may not be used for TBIT passengers, they would still be in use by LAX as passenger gates subject to the Stipulated Settlement.

The DEIR then states that "based on the above, implementation of the proposed project would result in a net reduction of 5 aircraft gates, with 7 gates being added to the current total of 12 gates at TBIT and 12 gates being eliminated with the demolition of the American Eagle Commuter Terminal." The demolition of the American Eagle Commuter Terminal, however, does not result in a decrease in the number of gates, since American Eagle is moving its operations to the unused United Express terminal and upgrading seven of the 18 existing aircraft hard-stand gates to contact gates. DEIR, p. 3-7.[3]

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[2] Although the DEIR does not mention using the remote gates for "military and dignitary use," it also does not state that the remote gates will not be used for flights that "do not process passengers through TBIT." NOP, p. 5.

[3] This also raises the question as to whether American Eagle's move to the old United Express terminal will increase or reduce busing from the main terminal to the new American Eagle terminal. This aspect of the Bradley West Project has not been analyzed in the DEIR.

Two questions are thus raised by the increase in number of gates in the DEIR: (1) how will that increase be offset sufficient to comply with the Stipulated Settlement; and (2) how will the impact of any increase be accounted for? As the apparent proposed increase in gate capacity is an essential predicate to increased operational capacity,[4] its environmental impacts should be addressed in the EIR. To the extent that the increase in gate capacity will be offset by a decrease in another project, that project and its environmental effects must be analyzed in the EIR.

III. THE DEIR DOES NOT TAKE INTO ACCOUNT CUMULATIVE IMPACTS OF THE BRADLEY WEST PROJECT.

The DEIR does not mention, let alone evaluate, the cumulative impacts of the Bradley West Project when taken together with the other projects ongoing as a result of the Master Plan and Specific Plan.

> The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

CEQA Guidelines, § 15355.

There is no doubt that the Specific Plan projects are reasonably foreseeable, given that NOPs for their environmental review are being circulated contemporaneously with this DEIR. Nor can it be argued that those projects are not closely related to the Bradley West Project. For example, the purpose of the Specific Plan project separating the runways in the North Runway Complex is accommodation of New Large Aircraft ("NLA"), like the A-380, the same purpose as asserted for part of the Bradley West Project. DEIR, p. 2-27. ("As part of the proposed Project, both taxiways would be relocated approximately 518 feet to the west . . . and would be designed and constructed to accommodate ADG VI aircraft").

Moreover, the NOP included in its project description the construction of two tunnels to connect the Midfield Satellite Concourse, TBIT and CTA as part of the taxiway relocation. The

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[4] Indeed, American Eagle will be moving from a facility with 12 passenger gates to a facility with 18 passenger gates that are not currently in use.

NOP contains inconsistent statements in this regard. The DEIR modifies that language and now states that "while the impacts analyses presented in this EIR relative to relocation of Taxiways Q and S include the subject tunnel segments (i.e., tunnel segments were included in the initial project description used as the basis of the impacts analysis), the actual construction of the tunnel segments and system is anticipated to occur through a discretionary approval(s) separate from the Bradley West Project." DEIR, p. 2-27.

However, this approach fails to take into account the tunnel's cumulative impact when combined with those of other planned projects. It is not only the construction of the tunnels that is at issue here. It is also the environmental impact that the tunnels will have once they are operational, which has not been analyzed. Since the Midfield Satellite Concourse is "reasonably foreseeable," and the function of the tunnels is facilitate the movement of traffic between the facilities, the cumulative effect that the tunnels will have should be discussed in the EIR for Bradley West Project. With the tunnels still on the table, it seems that their larger purpose is to connect CTA with World Way West, giving passengers direct access to the western end of the airport. That concept remains unanalyzed.

Finally, the NOP stated that there will eventually be a new linear concourse to replace Terminals 1, 2 and 3 which is already anticipated by the Master Plan and that the linear concourse will be connected to TBIT. NOP, p. 4, n. 4. Although the DEIR has apparently dropped reference to any connection between TBIT and the replacement for Terminals 1, 2 and 3, there is no indication that there will not be such connection. If a connection is still part of the Bradley West Project and/or part of the demolition of Terminals 1, 2 and 3, the environmental implications of the proposed replacement for Terminals 1, 2 and 3 should be discussed in concert with the Bradley West Project analysis.

While the Bradley West Project's individual impacts may be portrayed as "minor," in comparison to those of the other projects, both individually and collectively, this comparison does not exempt the Bradley West Project from a collective evaluation with the other contemporaneous Specific Plan and approved Master Plan projects. *See, e.g., Kings County Farm Bureau v. City of Hanford*, 221 Cal.App.3d 692, 720 (1990) ("cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time").

In short, the Bradley West Project is part of a larger complex of projects aimed at readying LAX for more and larger aircraft, most of which were not analyzed in the Master Plan EIR. The DEIR should, therefore, at minimum, disclose the potential cumulative impacts of the

Bradley West Project when taken together with the Specific Plan projects and approved Master Plan projects that have the same purpose.

IV. THE DEIR RUNS AFOUL OF THE RULE AGAINST SEGMENTATION.

The Bradley West Project includes tunnels to accommodate the new Crossfield Taxiway while allowing easy passenger access to TBIT and the Midfield Terminal. The tunnels discussed in the NOP and the undergrounding of World Way West discussed in the separate NOP for the Crossfield Taxiway appear to provide an uninterrupted route between the Midfield Terminal, or even the western border of the airport at Pershing, and the CTA, through TBIT, which could eventually be made to accommodate travelers by creating a route from western airport ingress on Pershing all the way to the Midfield Satellite and beyond.

There is, however, no discussion of this enhanced passenger access potential or the impacts of the capacity or traffic that might result from such access. CEQA Guidelines define "project" to mean "the whole of an action" that may result in either a direct or reasonably foreseeable indirect physical change in the environment. CEQA Guidelines § 15378(a). This ensures "that environmental considerations not become submerged by chopping a large project into many little ones, each with a potential impact on the environment, which cumulatively may have disastrous consequences." *Burbank-Glendale-Pasadena Airport Authority v. Hensler*, 233 Cal.App.3d 577, 592 (1991). There are occasions when larger projects may be "segmented" into smaller components. They are limited to the circumstance when each segment has "independent utility," *i.e.*, where the one segment would serve a viable purpose even if the rest is never built. *See, Del Mar Terrace Conservancy, Inc. v. City Council of the City of San Diego*, 10 Cal.App.4th 712, 732-33 (1992).

In this case, the terminal and tunnel projects are dealt with separately, but appear to be so interconnected as to be absent the requisite independent utility. Therefore, their traffic, air quality and capacity impacts should be discussed in conjunction with those projects.

V. THE DEIR'S PROPOSAL FOR AN EIR LIMITED ONLY TO "ENVIRONMENTAL EFFECTS" FROM "PROPOSED CONSTRUCTION ACTIVITIES" IS INADEQUATE TO SATISFY CEQA.

The DEIR claims that it need only address the "environmental effects" from "proposed construction activities" because this is a project-level EIR tiered to the Master Plan EIR. DEIR,

p. 1-12. However, the environmental effects of the Bradley West Project on air quality go beyond the impacts of construction.

First, the DEIR defines next generation aircraft as more "fuel efficient," but does not provide any evidence to support that statement. DEIR, n. 11, p. 2-3. Since the Bradley West Project is specifically designed to accommodate next generation aircraft (DEIR, p. 2-3) the EIR needs an in-depth discussion of: (1) air quality impacts of additional types and numbers of aircraft enabled by the Bradley West Project; (2) air quality impacts of the increase in "Next Generation Aircraft" operating at the airport; and (3) air quality impacts of potential increased vehicular traffic enabled by the new tunnels, and the precise extent to which such increases may be offset by reduction in use of remote gates.

Of particular concern is one of the primary features of the redesigned TBIT: the upgrading of the gates to accommodate "New Large Aircraft" (NLA). The goal, presumably, would be to accommodate additional NLA operations to LAX. As a direct result of the Bradley West Project, the DEIR predicts that there will be at least four more NLA arrivals at LAX per day. DEIR, p. 4-365 ("without the new contact gates and associated taxiway improvements at TBIT by 2013 . . . there are nine NLA arrivals per day . . . In the Bradley West Project simulation there are nine available gates for 13 NLA arrivals"). The environmental impact of the additional NLA arrivals (and, presumably, departures) needs to be assessed in the DEIR.

In short, the Bradley West Project may not have the limited air quality portrayed in the DEIR. Cities therefore strongly recommend that, given the potential synergistic air quality impacts of the Bradley West Project with other projects currently being evaluated in separate environmental processes for the Specific Plan and the remaining projects in the proposed Master Plan, as well as the Bradley West Project's potential for increasing capacity, complete air quality analyses be performed as part of the EIR. These analyses should include, at minimum, an air quality conformity applicability analysis, which takes into account the potential air quality impacts of other projects, planned or ongoing.

VI. THE DEIR'S ANALYSIS OF GREENHOUSE GASES AND POTENTIAL IMPACT OF CLIMATE CHANGE IS INADEQUATE

A. Thresholds of Significance

The DEIR states on p. 4-316 that there are no thresholds of significance identified by the state for greenhouse gases. While it is true that there are no approved thresholds of significance.

CARB has published *Preliminary Draft Staff Proposal: Recommended Approaches for Setting Interim Significance Thresholds for Greenhouse Gases under the California Environmental Quality Act* on October 24, 2008. That document suggests a 7,000 metric ton CO2e/year threshold for transportation projects, such as this one. It is the Cities' position that this threshold should be used in the EIR to assess the significance of the Bradley West Project's increase in the amount of greenhouse gases emitted.

In addition, on March 10, 2009, the U.S. Environmental Protection Agency issued a proposed rule which constitutes a comprehensive national system for reporting emissions of carbon dioxide and other greenhouse gases produced by major sources in the United States. There is no mention in the DEIR as to whether this program will apply to the Bradley West Project.

B. The DEIR Does Not Fully Analyze the Impacts from Climate Change

In § 4.6.6.4 "Impacts from Climate Change," the DEIR attempts to anticipate the effects that would occur at the airport due to climate change. The DEIR simply states, without any support, that "sea level rise is most relevant to the Bradley West Project." DEIR, p. 4-330. The DEIR, however, does not address many possible impacts that climate change may have on Bradley West Project. For example:

1. Increased energy demands for cooling;
2. Soil moisture decrease, which will cause subsidence of the TBIT;
3. Buckling of pavements and concrete structures;
4. Shorter service life of metal and pavements;
5. Advanced equipment weathering;
6. Air and water quality impacts;
7. Fuel performance of vehicles;
8. To the extent that the Bradley West Project affects aircraft operations (which Cities contends it does), aircraft operations changes due to decreased lift.

Of most concern to Cities, is the way in which the Bradley West Project will affect the air and water quality in the surrounding area when climate change is taken into account. It is not clear that the analysis of TBIT's operations, as well as its construction, have factored in the potential additional emissions that could be caused by climate change during the lifetime of TBIT.

In summary, under current circumstances, it is inaccurate to suggest that the Bradley West Project will have the insignificant air quality, noise or other impacts portrayed in the DEIR. Cities therefore strongly recommend that, given the potential synergistic air quality and noise impacts of the Bradley West Project with other projects currently being evaluated in separate environmental processes for the Specific Plan and the remaining projects in the proposed Master Plan, as well as the Bradley West Project's potential for increasing capacity, complete air quality and noise analyses be performed as part of the EIR. These analyses should include, at minimum, an air quality conformity applicability analysis, which takes into account the potential air quality impacts of other projects, planned or ongoing, and not merely construction of the Bradley West Project, as well as the noise impacts of the additional aircraft that will be using TBIT as a result of the Bradley West Project.

Cities appreciate this opportunity to comment and request that future documents continue to be transmitted to the office of their counsel, Chevalier, Allen & Lichman, LLP, at the above address.

Sincerely,

CHEVALIER, ALLEN & LICHMAN, LLP

Barbara Lichman

Barbara E. Lichman, Ph.D.

RESOURCE MANAGEMENT AGENCY

county of ventura

Planning Division
Kimberly L. Rodriguez
Director

June 22, 2009

Los Angeles World Airports
Facilities Planning Division
7301 World Way West, 3rd Floor
Los Angeles, CA 90045-5803
Attn.: Dennis Quilliam

E-mail: bradleywestproject@lawa.org

Subject: Comments on DEIR for the Bradley West Project at Los Angeles International Airport

Dear Mr. Quilliam:

Thank you for the opportunity to review and comment on the subject document. Attached are the comments that we have received resulting from intra-county review of the subject document. Additional comments may have been sent directly to you by other County agencies.

Your proposed responses to these comments should be sent directly to the commenter, with a copy to Laura Hocking, Ventura County Planning Division, L#1740, 800 S. Victoria Avenue, Ventura, CA 93009.

If you have any questions regarding any of the comments, please contact the appropriate respondent. Overall questions may be directed to Laura Hocking at (805) 654-2443.

Sincerely,

Tricia Maier, Manager
Program Administration Section

Attachment

County RMA Reference Number 09-023

800 South Victoria Avenue, L# 1740, Ventura, CA 93009 (805) 654-2481 Fax (805) 654-2509

VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT
Memorandum

TO: Laura Hocking/Dawnyelle Addison, Planning DATE: June 2, 2009

FROM: Alicia Stratton

SUBJECT: Request for Review of 09-023 DEIR Tom Bradley International Terminal Reconfiguration Project, Los Angeles International Airport, Los Angeles World Airports (Reference No. 09-023)

Air Pollution Control District staff has reviewed the subject project, which is a proposal for construction of new north and south concourses at the Tom Bradley International Airport. The project also includes construction of nine aircraft gates along the west side of the new concourses and relocation and consolidation of existing aircraft gates along the east side, renovation and enlargement of U.S. Customs and Border protection, concessions, office and operations areas. Among the objectives of the project are to accommodate "New Generation Aircraft" such as the Airbus A380, Boeing 747-8, and Boeing 787; improve passenger level of service and avoid loss of international travelers to airports outside the region and related adverse direct and indirect economic consequences.

Because the project location is Los Angeles, it is under the regulatory requirements of the South Coast Air Quality Management District, and, we therefore defer to South Coast Air Quality Management District for their comments on air quality issues for this project.

If you have any questions, please call me at (805) 645-1426.

BWP-AL00004

County of Los Angeles
CHIEF EXECUTIVE OFFICE
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 713, Los Angeles, California 90012
(213) 974-1101
http://ceo.lacounty.gov

WILLIAM T FUJIOKA
Chief Executive Officer

Board of Supervisors
GLORIA MOLINA
First District
MARK RIDLEY-THOMAS
Second District
ZEV YAROSLAVSKY
Third District
DON KNABE
Fourth District
MICHAEL D. ANTONOVICH
Fifth District

June 26, 2009

Dennis Quilliam
City Planner
Los Angeles World Airports
7301 World Way West, 3rd Floor
Los Angeles, CA 90045

Dear Mr. Quilliam:

COUNTY OF LOS ANGELES COMMENTS REGARDING LAX TOM BRADLEY INTERNATIONAL TERMINAL RECONFIGURATION PROJECT

The County of Los Angeles (County) has reviewed the Draft Environmental Impact Report (DEIR) for the Los Angeles International Airport (LAX) Tom Bradley International Terminal (TBIT) Reconfiguration Project, also referred to as the Bradley West Project. Consistent with the California Environmental Quality Act (CEQA), our comments on the Bradley West Project are presented below.

1. **USE OF LAX MASTER PLAN FINAL ENVIRONMENTAL IMPACT REPORT (EIR):** The Bradley West DEIR is a project-level assessment that is tiered from and based upon the program-level information contained in the 2004 Final EIR. It refers to the 2004 EIR as a fully-certified and legitimate framework for subsequent LAX Master Plan activities. Although the EIR references the settlement agreement (p. 1-9), it does so in terms of the petitioners' challenge to the approval of the Master Plan program; the EIR is silent on the petitioners' challenge to the adequacy of the Master Plan EIR. The County has consistently noted the LAX Master Plan Final EIR is fundamentally flawed and should not be used as the basis for concluding that issues have previously been examined.

2. **SAFETY AND SECURITY:** The Bradley West DEIR does not evaluate safety and security for neighborhoods surrounding LAX.

3. **TRANSPORTATION:** The DEIR does not address improvements that have previously been recommended by the County, including direct airport access from the I-105 Freeway and an interchange at I-405 Freeway and Lennox Boulevard, nor does it reference the County-recommended development of a Master Transportation Improvement Plan with phasing and monitoring elements.

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BWP-AL00005

4. **LAND USE PLANNING:** The DEIR does not acknowledge the Airport Land Use Commission finding that the LAX Master Plan is inconsistent with the County Land Use Plan. In fact, the DEIR states in Table 1-3 that there is no conflict between the project and any applicable plan or policy.

5. **STRATEGIC REGIONALIZATION:** The DEIR does not address LAWA's obligation to spearhead regional distribution of air traffic demand.

Thank you for this opportunity to comment on this project.

Sincerely,

WILLIAM T FUJIOKA
Chief Executive Officer

WTF:ES:MKZ
FC:JR:pg

c: Each Supervisor
Acting County Counsel
Director of Public Works
Director of Public Health

BWP-AL00005

FORM GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

File: SC.CE

DATE: June 18, 2009

TO: Dennis Quillliam, City Planner
Facilities Planning Division
Los Angeles World Airports

FROM: Brent Lorscheider, Division Manager
Wastewater Engineering Services Division
Bureau of Sanitation

SUBJECT: **Los Angeles International Airport Tom Bradley International Terminal (TBIT) Reconfiguration Project – Draft EIR**

This is in response to your May 7, 2009 letter requesting wastewater service information for the proposed project. The Bureau of Sanitation, Wastewater Engineering Services Division (WESD), has conducted a preliminary evaluation of the potential impacts to the wastewater system for the proposed project.

Projected Wastewater Discharges for the Proposed Project:

Type Description	Average Daily Flow per Type Description (GPD/UNIT)	Proposed No. of Units	Average Daily Flow (GPD)
Proposed			
Terminal	80 GPD/1000 SQ.FT	1,046,990 SQ.FT	83,759
	Total		**83,759**

SEWER AVAILABILITY

The sewer infrastructure in the vicinity of the proposed project includes the existing 57-inch Central Outfall Sewer (COS). The developer plans to connect to an existing private 12-inch sewer line, which feeds into the existing 57-inch Central Outfall Sewer (COS) line on Airport SS Easement, before discharging into a 60-inch COS line on Imperial Hwy. The current flow level (d/D) in the 57-inch and 60-inch lines cannot be determined at this time.

Based on our existing MIKE URBAN modeling data, the current approximate flow level (d/D) and the design capacities at d/D of 50% in the sewer system are as follows:

Pipe Diameter (in)	Pipe Location	Current MIKE URBAN Modeling d/D (%)	50% Design Capacity
57	Airport SS Easement	20	30.48 MGD
60	Imperial Hwy	*	57.96 MGD

* No data available

Based on the estimated flows, it appears the sewer system might be able to accommodate the total flow for your proposed project. The developers will be required to connect into the12-inch private sewer line, no direct connection is allowed in the COS. Further detailed

BWP-AL00006

10

gauging and evaluation will be needed as part of the permit process to identify a sewer connection point. If the public sewer has insufficient capacity then the developer will be required to build sewer lines to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit will be made at that time. Ultimately, this sewage flow will be conveyed to the Hyperion Treatment Plant, which has sufficient capacity for the project.

If you have any questions, please call Abdul Danishwar of my staff at (323) 342-6220.

STORMWATER REQUIREMENTS

The Bureau of Sanitation, Watershed Protection Division is charged with enforcement of the provisions of the National Pollutant Discharge Elimination System (NPDES) permit.

SUSMP AND STORM WATER INFILTRATION

Standard Urban Stormwater Mitigation Plan (SUSMP) is required for projects of certain size and type. The projects that are covered under these categories are required to incorporate measures to mitigate the impact of stormwater runoff as outlined in the guidance manuals titled "*Development Best Management Practices Handbook - Part B: Planning Activities*". In addition the "*SUSMP Infiltration Requirements and Guidelines*" prioritizes the use of infiltration and bio-filtration systems as the preferred methods to comply with SUSMP requirements. These documents can be found at: www.lastormwater.org/Siteorg/businesses/susmp/susmpintro.htm.

WET WEATHER EROSION CONTROL

A Wet Weather Erosion Control Plan is required for construction during the rainy season (between October 1 and April 15 per Los Angeles Building Code, Sec. 7002). For more information, please see attached Wet Weather Erosion Control Guidelines.

STORMWATER POLLUTION PREVENTION PLAN

A Storm Water Pollution Prevention Plan (SWPPP) is required for land disturbance activities over one acre. The SWPPP must be maintained on-site during the duration of construction.

WPD staff is available at your request to provide guidance on stormwater issues. Should you have any questions, please contact Meher Irani of my staff at (213) 485-0584.

Attachments:
Wet Weather Erosion Control

cc: Meher Irani, BOS
Daniel Hackney, BOS
Rowena Lau, BOS

File Location: \Div Files\SCAR\CEQA Review\FINAL CEQA Response LTRs\LAX TBIT Reconfiguration Project-Draft EIR.doc

BWP-AL00006

Los Angeles World Airports

WRITTEN COMMENTS

LAX TOM BRADLEY INTERNATIONAL TERMINAL (TBIT) RECONFIGURATION PROJECT / BRADLEY WEST PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)

Please print.

Date: June 6, 2009
Name: Mark Stjernberg
Organization: local resident
Address: 8230 Zitola Terr, Playa Del Rey, CA 90293
Comment:
Recommend approval of the EIR. Suggest that the contractor staging area be relocated to the Pershing site.

Please drop completed form into the box marked "COMMENTS" at the June 3 or June 6, 2009 public meetings or mail to:

Los Angeles World Airports
Facilities Planning Division
Attention: Dennis Quilliam
7301 World Way West, 3rd Floor
Los Angeles, CA 90045-5803

All comments must be received no later than 5:00 p.m., Monday, June 22, 2009.

BWP-PC00001

Los Angeles World Airports

WRITTEN COMMENTS

LAX TOM BRADLEY INTERNATIONAL TERMINAL (TBIT) RECONFIGURATION PROJECT / BRADLEY WEST PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)

Please print.

Date: June 6, 2009
Name: NAN SCHNEIDER
Organization: ARSAC
Address: 7929 Brean Ave LA 90045
Comment:
Arsac would like to see the parking lot on the north moved to the alternative location. Arsac also feels that holding areas will be insufficient for the larger aircraft. Especially once LAX returns to profitability.

Please drop completed form into the box marked "COMMENTS" at the June 3 or June 6, 2009 public meetings or mail to:

Los Angeles World Airports
Facilities Planning Division
Attention: Dennis Quilliam
7301 World Way West, 3rd Floor
Los Angeles, CA 90045-5803

All comments must be received no later than 5:00 p.m., Monday, June 22, 2009.

BWP-PC00002

From: Avram Aelony [mailto:aavram@mac.com]
Sent: Wed 5/13/2009 8:40 PM
To: Bradley West Project
Subject: Draft Environmental Impact Report

"Los Angeles World Airports last week released the Draft Environmental Impact Report for the Tom Bradley International Terminal (TBIT) Reconfiguration Project, and I urge you to send any comments or concerns you may have by the June 22, 2009 deadline."

Is this Draft available for viewing?

Please provide a link.

Thank you.

BWP-PC00003

From: pat brubaker [mailto:pbrubaker@sbcglobal.net]
Sent: Thu 5/14/2009 12:22 PM
To: Bradley West Project
Subject: LAX

I am a long time Westchester and LA resident and have seen LAX grow like a cancer on the surrounding communities. It must stop or the whole west side will be only an LAX site.

MODERNIZE YES
EXPAND NO, NO
REGIONALIZE YES, YES
GREEN YES AND YES AGAIN. . . .

Stop killing residential communities . . . . .have you seen the fine black soot from jet fuel that collects on structures surrounding the airport for miles . . .
Thank you,

Pat Brubaker
7919 Belton Drive
Westchester, CA 90045

BWP-PC00004

From: chcarlson5050@aol.com [mailto:chcarlson5050@aol.com]
Sent: Sun 5/17/2009 12:04 PM
To: Bradley West Project
Subject: TBIT Reconfiguration Project

As long time residents of Westchester and users of LAX, we do not object to modernizing the Bradley Terminal. We do object to any expansion. We do not need additional airlines and planes using LAX. These airlines need to be encouraged to use other regional airports. LAX is one of the least expensive airports for airlines to use. Modernizing costs need to be passed on to the airlines, encouraging them to fly out of other airports as the cost would be equal.

I also understand that a large worker parking lot is to be constructed on Westchester Parkway near our neighborhoods. This is untenable. It must be moved somewhere it does not impact neighborhoods. Also using streets such as Lincoln, Sepulveda, or Manchester as an entrance to parking areas would create a mess as far as traffic goes. Imperial has a lot less traffic and a parking area on that end would be much better.

We hope the concerns of residents of this community will be taken into consideration and addressed.

Carol and Ken Carlson
6031 Will Rogers St.
Westchester

BWP-PC00005

From: Beverly Ponder [mailto:beverlyponder@verizon.net]
Sent: Sun 5/24/2009 11:45 AM
To: Bradley West Project
Subject: Airport - LAX

This e-mail is to let you know that I and the residents of Playa del Rey that I have spoken for are not in favor of LAX expansion. It is time that other airports shared the traffic, noise and pollution that the residents around the airport have suffered. A regional approach must be taken to accommodate airline services, not overburdening an existing airport and congesting our freeways with the traffic to and from the airport. If modernization can be accomplished without expansion into the North runway, then that is what I am in favor of. Thank you for the opportunity to express my opinion.

Beverly Ponder, 6400 Pacific Ave., #309, Playa del Rey, CA

BWP-PC00006

From: coyne-hoerle [mailto:coyne-hoerle@ca.rr.com]
Sent: Thu 6/4/2009 8:36 PM
To: Bradley West Project
Subject: Tom Bradley Int'l Airport Reconfiguration Project (TBIARP)

Dear Sir/Madam:

Subject: TBIT Draft Environmental Impact Report

I am very concerned regarding the Reconfiguration Project and the impact on the environment. I believe there are other ways, such as expanding the role of regional airports and pricing projects to alleviate traffic at lax.

Thank you. I will appreciate your placing me on any and all mailing lists concerning this project.

Sincerely yours,

Helen Coyne-Hoerle
Attorney at Law, Retired
13210 F Admiral Ave
Marina Del Rey, CA 90292
310.751.6108

BWP-PC00007

Los Angeles International Airport Area Advisory Committee

Committee Members: Residents of El Segundo, Inglewood, Lennox, Hawthorne, Culver City, Marina del Rey and Westchester/Playa del Rey

June 16, 2009

Dennis Quilliam
LAWA Facilities Planning Division
7301 World Way West, 3rd Floor
Los Angeles, California 90045

RE: Bradley Reconfiguration Project

Dear Mr. Quilliam:

The Los Angeles International Airport Area Advisory Committee (LAXAAC) provides these comments regarding the Draft Environmental Impact Report (Draft EIR) for the Tom Bradley International Terminal (TBIT) Reconfiguration Project.

Our committee includes residents from both the Westchester/Playa del Rey community and the City of El Segundo. As such, we believe that neither the proposed Northwest Construction Staging/Parking Area nor the proposed Southeast Construction Staging/Parking Area is an appropriate location for construction staging and parking. For that reason, we suggest that LAWA use the West Construction Staging Area for construction staging and parking during the five and one-half years of the TBIT Reconfiguration Project.

We recognize that TBIT is inadequate for current traffic and we recognize the need to modernize TBIT. Inasmuch as TBIT currently handles as many as 550 passengers per flight, and it is expected that larger planes will accommodate more people, perhaps as many as 750 per flight, we are concerned that the facilities planned may not be adequate to accommodate that many people. The Draft EIR should address the adequacy of the planned facilities to accommodate large numbers of people arriving at one time.

We note that the Draft EIR anticipates an increase in international travel activity levels by 2013 whether or not the TBIT Reconfiguration Project occurs (see Table 1-2, page 1-22 and page 2-44). For that reason, LAWA ultimately should be undertaking efforts to regionalize air transportation for both security and efficiency reasons. That might mean that LAWA would enhance and promote the Ontario airport for international travel to Canada and Mexico, or would take steps to diminish the attractiveness of LAX for domestic travel in favor of Ontario.

We firmly believe that only a regional approach to air transportation will mitigate the transportation and security problems currently impacting the entire Southern California area. Only if the air traffic burden can be spread throughout the Southern California region, will we continue to see the economic benefits of a vibrant transportation system without unduly impacting one portion of the Southern California community. Please do not lose sight of this ultimate goal.

Please let us know if you have any questions regarding our comments. See attached mission statement.

Very truly yours,

John Dragone

John Dragone, Chair
Los Angeles International Airport Area Advisory Committee
c/o LAX Community Relations
81 World Way / P.O. Box 92216
Los Angeles, CA 90009-2216

cc: Los Angeles Mayor Antonio Villaraigosa
LAWA Board of Airport Commissioners

BWP-PC00008

Los Angeles International Airport Area Advisory Committee

Committee: Residents of El Segundo, Inglewood, Lennox, Hawthorne, Culver City, Marina del Rey and Westchester/Playa del Rey

Los Angeles International Airport Area Advisory Committee (LAXAAC)

Background Statement

The Los Angeles International Airport Area Advisory Committee (LAXAAC) has been in existence for more than 30 years as an advisory board to the Board of Airport Commissioners (BOAC).

Members of the committee are appointed by the appropriate legal authority in communities immediately surrounding LAX:

El Segundo,
Lennox,
Hawthorne,
Inglewood,
Culver City,
Marina del Rey,
and the Westchester and Playa del Rey areas of Los Angeles.

The members of LAXAAC have one overriding concern about LAX: **safety.** This concern includes safety for those who work or live near LAX in addition to air passengers, crews, and aircraft.

Other concerns for committee members are air and noise pollution and surface traffic in and around their communities.

The members of LAXAAC will continue to participate in LAX issue discussions and proposals and look forward to on-going interaction with the members of the BOAC and LAWA staff.

06/09

BWP-PC00008

From: Danna Cope [mailto:dannacope@gmail.com]
Sent: Mon 6/22/2009 4:50 PM
To: Bradley West Project
Subject: Comments on TBIT DEIR

DANNA COPE
8219 Reading Ave
Westchester, CA 90045
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Mr. Dennis Quilliam bradleywestproject@lawa.org
City Planner
Los Angeles World Airports
7301 WorldWay West
Los Angeles, CA

Re: Draft EIR for Bradley West Project
Los Angeles City File No. AD043-08, May 2009

Dear Mr. Quilliam:

For a project of this size, more time is needed for community members to review the documents, especially as many references are made to the Master Plan EIR, without including the pertinent data within the TBIT DEIR.

As a minimum, all construction/destruction contractors and equipment should follow the rules and restrictions that were established for the South Airfield Improvement Project. This should include all potential sources of air or noise pollution.

LAWA employee Mike Doucette has stated that the new lounge areas for TBIT are based on the number of air passengers that are currently being carried by aircraft, such as the NLA A380, plus an additional 20%. However, as we have seen with the SSTs and 747s, after the new aircraft are in use for a few years, the number of passengers increases dramatically. The A380s are currently carrying about 550 passengers; however, they have been cleared by the FAA to carry over 750 passengers. 550 plus 20% comes to only 660 passengers, per aircraft, not 750. This deficit in the future capability to serve the potential number of air travelers highlights the compelling need for LAWA to proceed immediately to implement measures to achieve a true regional approach to air traffic.

The TBIT DEIR should include information, preferably in map form, that indicates the location of the crossfield taxiway(s), and the midfield terminal.

The construction of TBIT and the crossfield taxiway may coincide; what measures are being taken to facilitate potential air traffic delays due to blocked runways/taxiways?

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What measures are proposed to provide additional support to the upper level of the CTA? The roadway is almost buckling in some areas. What studies have been done since the additional heavy concrete barriers were erected for security purposes?

LAWA should publicize to the surrounding communities information on runway closures and off- and on-airport street closures, stating the duration and start and end dates for the closures.

Setting, Environmental Impacts, and Mitigation Measures; TBIT 4.1.9, Mitigation Measures: MM-ST (BWP)-1 Trip Reduction Measures (a): While the FlyAway program offers the only true traffic reduction at LAX, it is unreasonable to expect this service to provide relief for the TBIT air passenger traffic; these are international travelers, often with extra baggage, often arriving by taxi service.

Mitigation Measures, TBIT 4.2.9: Thirteen major intersections surrounding LAX are listed as having significant and unavoidable traffic impact; the improvements considered in the TBIT Draft EIR were determined to be infeasible. Only six intersections were found to have mitigation measures that would reduce the traffic impacts to a less-than-significant level. The project, therefore, will cause an undue hardship on the surrounding communities.

Noise: TBIT 4.8: The proposed parking/construction staging area located to the north of LAX Runway 24R is unsuitable and should not be used, especially as it would involve noise and surface traffic impacts due to vehicles passing through the Westchester and Playa del Rey communities. Parking at the west end of the airport, accessed by the 105 Freeway and Imperial Highway is preferable. If more area is needed, Lot B and/or areas adjacent to the Green Line Station should be utilized.

Off-Airport Surface Transportation: TBIT 4.2, 4.3: The proposed parking/construction staging area located to the north of LAX Runway 24R is unsuitable and should not be used, especially as it would involve noise and surface traffic impacts due to vehicles passing through the Westchester and Playa del Rey communities. Parking at the west end of the airport, accessed by the 105 Freeway and Imperial Highway is preferable. If more area is needed, Lot B and/or areas adjacent to the Green Line Station should be utilized.

Population, Housing, Employment and Growth-Inducement: TBIT 5.2: Due to the noise and congestion from increased surface traffic to support the additional air traffic capacity at TBIT, housing prices could be adversely affected. Additional air traffic noise could also affect housing sales and prices.

Air Quality: TBIT 4.4: All studies pertaining to particulate matter should include matter that is below P2.5. If the studies done for the LAX Master Plan EIR did not study the potential effects of this smaller particulate matter, new studies must be done. In addition, studies must include increased traffic and engine idling to do traffic stoppages

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in the Central Terminal Area due to additional surface traffic that will result from increased air traffic capacity at TBIT.

Hydrology/Water Quality: TBIT 5.3: Due to recent seismic activity in the area and the age and location of underground conduits, such as large sewer pipes, there is a potential for ground slippage and/or movement, both during and after construction. These potential impacts must be thoroughly studied.

Endangered and Threatened Species of Flora and Fauna: TBIT 5.5: The wording in Table 1-1 on page 1-16 is confusing. What wet season was used for the surveys on Riverside fairy shrimp in the ponded areas? The statement here seems to say that statistics from the year 2009 were used for "wet season surveys." 2009 is one of the driest years on record and data based on 2009 records should not be used in any "wet season survey."

Energy Supply and Natural Resources: TBIT 5.7: What will be the impact of the additional energy consumption due to the enlargement on TBIT? Although energy conservation measures were "recommended" in the MP EIR, this does not guarantee that they will be implemented in the TBIT project as they must be.

Solid Waste: TBIT 5.8: Waste reduction measures were recommended in the MP EIR. They must be included as mandatory rather than recommended in the TBIT Draft EIR.

Earth and Geology:; TBIT 5.10. In light of the recent earthquake activity that was centered in Lennox and Inglewood, two communities that are adjacent to LAX, new studies need to be done to determine potential impacts related to geotechnical issues, such as earthquakes and other seismic-related hazards, ground failure, and landslides.

Hazards and Hazardous Materials: TBIT 5.11: There may be potential danger from hazards and hazardous materials due to seismic activity, which could expose sewage and/or fuel leakage due to ruptured lines or pipes. These potential hazards must be studied for this project.

Human Health Risks: TBIT 4.5: New studies on potential air pollution are needed to include particulate matter under P2.5.

Public Services: TBIT 5.13, 5.14: Potential aircraft noise impacts on schools especially Westchester High School, St. Bernards, and others in Westchester; parks, such as Westchester and Neilson; and the Inglewood and Westchester Libraries must be delineated. Anticipated time-frames within the project when these impacts would occur should be identified and plans incorporated to provide public notice to the communities and public services before and during such impacts. Procedures for providing information to the surrounding communities regarding runway closures and increased air traffic on runways due to the TBIT construction must also be included. In addition, whenever a construction project is undertaken there is always a potential for

police or fire services. Public notice to these agencies must be provided before and during impacts.

Climate Change/Greenhouse Gas: TBIT 4.6: The potential impact from climate change and/or greenhouse gas emissions must be studied, based on the most current technology.

Sincerely,

Danna Cope

BWP-PC00009

WESTCHESTER DEMOCRATIC CLUB

June 19, 2009

Attention: Dennis Quilliam
Los Angeles World Airports
Facilities Planning Division
7301 World Way West, 3rd Floor
Los Angeles, CA 90045

Dear Mr. Quilliam:

The Westchester Democratic Club submits the following comments regarding the Draft Environmental Impact Report (Draft EIR) for the Tom Bradley International Terminal (TBIT) Reconfiguration Project.

Our Club includes residents primarily from Westchester, but also has members from Playa del Rey and other surrounding communities.

Our members are concerned about construction traffic into and through our areas and strongly recommend that the proposed Northwest Construction Staging/Parking Area be deleted. We also do not support the proposed Southeast Construction Staging/Parking Area as an appropriate location for construction staging and parking. We do suggest, however, that LAWA use the West Construction Staging Area for construction staging and parking during the five and one-half years of the TBIT Reconfiguration Project and that traffic be encouraged to use the 105 Freeway and Imperial Highway to access the location. If this area is not sufficient, then Lot B and/or the area near the Green Line Station should be utilized.

There is a definite need to modernize TBIT. It is inadequate for current and near-future air traffic. However, it is We are concerned that the that the new TBIT as outlined in the Draft EIR will not be adequate to accommodate the number of passengers that can realistically be expected in five and one-half years. The proposal must be modified to adequately accommodate large numbers of passengers arriving or departing at the same time unless these increased traffic figures can be minimized through regionalization.

As noted on Table 1-2, page 1-22 and page 2-44 of the Draft EIR, LAWA anticipates an increase in international air traffic by the year 2013 (regardless of whether the Draft EIR for TBIT is approved and the reconfiguration project undertaken). For security, efficiency, and environmental reasons, LAWA must concurrently take steps to achieve actual regionalization of air transportation in the Los Angeles basin. This should include well-publicized incentives

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BWP-PC00010

to relocate air traffic to Ontario – including international flights to Canada and Mexico. Disincentives for domestic air traffic at LAX should also be included along with incentives for airlines and passengers to utilize other airports..

A regional approach to air transportation is the only solution for mitigating the transportation, security, and environmental problems that are currently impacting our greater-LAX area. As air traffic increases, these impacts will increase dramatically and must be shared throughout the Southern California region. Only in that manner will we continue to enjoy economic benefits without unduly impacting one portion of the Southern California community. Regionalization must be our ultimate goal.

Please let us know what action is being taken to address our concerns.

Sincerely,

William R. Roberts

William R. Roberts
President

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BWP-PC00010

ARSAC Alliance for a Regional Solution to Airport Congestion

322 Culver Blvd., #231 Playa del Rey, CA 90293
310 841-4190 info@regionalsolution.org

HAND DELIVERED TO LAWA MAIL CENTER IN ADMINISTRATION BUILDING

June 21, 2009

Mr. Dennis Quilliam
City Planner
City of Los Angeles
Los Angeles World Airports
7301 World Way West, 3rd Floor
Los Angeles, CA 90045-5803

Subject: Draft EIR for Los Angeles International Airport (LAX) Bradley West Project (formerly Los Angeles International Airport [LAX] Tom Bradley International Terminal [TBIT] Reconfiguration Project), City of Los Angeles
Los Angeles City File No. AD 043-08, May 2009

Dear Mr. Quillam,

The Board of ARSAC (A Regional Solution to Airport Congestion) submits the following suggestions in response to the subject project.

LAX has been without adequate maintenance since the 1984 upgrades that added the upper roadway to the Central Terminal Area. ARSAC believes that the rebuilding of TBIT is long overdue and supports the concept of improving LAX safety, security, and the passenger experience. We provide the following comments to the subject draft EIR. The comments highlight two procedural issues related to this project and seven primary questions about the project and its impacts followed by detailed questions about specific items in the DEIR document.

To mitigate the environmental impact of this project, the operating/construction directives for controlling air pollution, noise, dust, hours of operation, construction workers parking and transportation, and disturbance for neighboring communities that were specified for the SAIP should again be incorporated into the EIR for this project with strict enforcement measures included.

Procedural issues:

1. Disagreement remains as to the adequacy of the project level EIR tiered off of the 2004 Alternative D EIR which incorporates "all by reference" without including project detail information into this project level EIR. The initial Project summary failed to address the 2004 Stipulated Settlement Agreement but it is mentioned subsequently. The Stipulated Settlement agreed that certain projects could go forward with basic study per the LAX Specific Plan. There was general

agreement that these were necessary projects pending establishment of the details. Adequacy of the Program level EIR data has been consistently challenged and not accepted as a specific element of the settlement. (See page 1-9 and many others.)
2. Public outreach on this project was poorly orchestrated. The public notice for the comment meetings were sent out buried with the text of a full page notice of small type. The meeting notice was also not accessible on the LAWA website.

Project related issues and/or analysis issues:

1. The creation and use of a parking lot along Westchester Parkway for construction worker staging is unacceptable. Comments to this were provided in the NOP. Any workable solution should include access via a gate off the 105 freeway/Imperial beyond Main Street which directs traffic along the inside of the airport property.
2. Overlap of construction schedules between TBIT and crossfield could restrict movements between north and south airfield complexes. The scheduling must be resolved. This could cause additional work for controllers, cause confusion for pilots, and can lead to an increase in incursions.
3. The construction area involved has long been subject to fuel spills and other toxic materials. We urge additional actions to avoid any possibility of toxic fugitive dust.
4. There is a question as to the total increase in space and utilization. We feel that even more concessions should be made available as we expect that they would have a high rate of return for LAWA. Further, the amount of space allocated for flight waiting areas should be expanded to accommodate future growth of the larger aircraft. The A380, for instance, is designed for 350-450 passengers now, but longer, more packed versions up to 1000 people are possible similar to the changes that occurred when the 747 was first introduced.
5. The DEIR shows that traffic in the CTA will be terrible with or without the project. New parking facility recommendations should be included in CTA area for this project.
6. Where is the blast glass recommended in the 2003 Rand Study of LAX security and in security discussions with the Israelis to be installed?
7. In Appendix B-2, 2013 is used the future horizon for the ground traffic impact studies. Why was 2013 chosen as the future horizon for traffic? The LAX Master Plan adopted in 2004 was intended to cover LAX through 2015. If the Bradley West DEIR is tiered off from the LAX Master Plan, then why does Bradley West DEIR have a traffic study that only goes through a 2013 horizon? Does CEQA allow for different planning horizons for tiered projects? Does LAWA have recent (2008 or 2009) traffic projections for 2015 that could be used for the Bradley West project?

Detailed specific issues to be addressed (bullet topic followed by questions/comments):

- Section 2.4.1.2 inconsistency:

Figures 2-1 shows ten eastern gates and 2-2 shows nine eastern gates. It is not impossible, but is difficult to reconcile with the text wording. One part describes nine

new gates without noting whether or not the two NLA compatible on each end of TBIT are included.

- Sterile transports to terminals three and four from TBIT are described in several places but details and scheduling is absent.
- The Chapter 2 description doesn't show the crossfield taxiways and how it interplays.
- Some of the following were mentioned as part of the crossfield taxiway program NOP but duplicated in the description of this project? Move taxiways S /O west 7 RON reside over night gates 2 ground fueling stations new AARF Aircraft Rescue and Fire Fighting
- Fig 1-3 doesn't show taxiway locations or existing RON locations.
- Coordination with Central Utilities Plant project is unclear.
- Para 2.4.1.2 states: "With implementation of the proposed project, international flights that process passengers through TBIT and that would otherwise use remote gates would instead be routed directly to and from TBIT, thereby eliminating the remote gate busing operations associated with those flights. To the extent development of the new gates along the west side of TBIT would reduce the need for, and use of, the existing remote gates for international flights, the remote gates would be more available to be used for Remain Overnight (RON) aircraft parking."

Does this mean that the remote gates are to be removed? When? Where is this addressed?

- The DEIR states "Relocation of existing Taxiways Q and S, as described in greater detail below, would require demolition of the existing American Eagle (American Airlines) Commuter Terminal, which has 12 existing aircraft gates. In conjunction with the expiration of American Airlines' existing lease and establishment of a new lease, the existing commuter operations at that facility would relocate to the existing commuter terminal located just east of Terminal 8, which was formerly operated by United Express but is now vacant. Nominally, based on the above, implementation of the proposed project would result in a net reduction of 5 aircraft gates, with 7 gates being added to the current total of 12 gates at TBIT and 12 gates being eliminated with the demolition of the American Eagle Commuter Terminal."

Are the American Eagle gates used? If not, are these gates counted in the total numbers available?
It says that there are 12+7=19 gates at TBIT in the new design?

- Par 2.4.1.3 states: "The existing bus gates would be replaced by a 28,400-square-foot busing operations holdroom comprised of either a pre-engineered metal building or a concrete tilt-up structure to be constructed at the northern end of the existing north concourse. The subject facility would accommodate the existing busing operations between TBIT and the west remote gates and between TBIT and International flights occurring at gates within the CTA. With development of the new contact gates at TBIT and the addition of new

sterile/secure connector corridors between TBIT and Terminals 3 and 4, the need for busing operations and associated passenger holdroom would be substantially reduced. The temporary busing operations holdroom would remain in operation until a new busing operation holdroom sized to reflect the reduced need for busing is constructed.

Where will a new holdroom be built? Why are the remotes apparently being kept active after TBIT is built? What size is currently existing inside TBIT and what will it become?

- The DEIR states "...The existing facility, including the north and south concourses and central core, encompasses a total of approximately 977,120 square feet. The proposed future facility would provide approximately 2,024,110 square feet of floor area. **Table 2-1** provides a breakdown of existing and future floor area uses within TBIT, including the central core and concourse areas, and **Figures 2-4a** through **2-4e** present conceptual floor plans for..."

At the public meeting we were told that the increase is about 750,000 square feet. Which is correct?
Figure 2.4a floor plan not readable.
Bradley West Core drawings are not readable.

- Paragraph 2.4.1.5 Taxiways S and Q Westward Relocation states: "The area along the west side of TBIT that is proposed for the new concourse facility, new gates, loading bridges, and aircraft apron area is currently occupied by Taxiways S and Q and an adjacent service road, which provide aircraft access between the north runway complex and the south runway complex. As part of the proposed project, both taxiways would be relocated approximately 518 feet to the west (from centerline of existing Taxiway Q to centerline of new Taxiway S), and would be designed and constructed to accommodate ADG VI aircraft. The relocated taxiways may be designated by the FAA as either taxiways, taxilanes, or one of each.

Does this mean that the two new crossfield taxiways may not be built per Alt D and that only the one approved for construction may proceed? What is the implementation schedule? How does the two project schedules overlap? If all are to be built to facilitate increased traffic between north and south complexes what visibility requirements have been established from the tower since this is currently a "no visibility zone."

- Paragraph 2.4.1.5 continues...the actual construction of the tunnel segments and system is anticipated to occur through a discretionary approval(s) separate from the Bradley West Project.

Does this refer to the sterile tunnels to Terminals 3 and 4 or to a future midfield concourse area? What schedule is anticipated?

- Paragraph 2.4.1.6 Building Heating and Cooling System states: The Bradley West Project improvements include provisions for meeting the heating and

cooling requirements of the building. A system that includes four natural gas boilers to generate hot water and seven chillers,...

What energy sources will be used for the supplemental heating and cooling system? Will there be a special pipline required for the low NOx natural gas mentioned in subsequent parts of the DEIR? How will this be integrated into the air flow systems? Will there be the ability to segregate air flow sections to avoid the total area contamination due to infectious or other contaminants?

- Paragraph 2.4.2 Removal/Relocation of Existing Facilities states: "Construction of the relocated taxiways would require the relocation and/or removal of several existing airfield facilities including, in addition to the busing facility and utilities described above, the existing loading dock at TBIT, seven RON aircraft parking spots, ground service equipment (GSE) storage and maintenance facilities, a ground vehicle fueling station, an airfield operations area (AOA) access control post, all or a part of the aircraft maintenance hangar formerly owned and operated by TWA, the American Airlines Low-Bay Hangar..."

What is the size of the RON spaces and how many will be put in place? What aircraft will these accommodate and what is the schedule for this? What alternative aircraft parking is anticipated for this? Why not put the RON where the current remote gates are? The aircraft types discussed for use at the RON did not mention A380 or other NLA?! Would this impact the free flow of aircraft between the north and south?

- Figure 2-7 The vehicle parking is moved from behind TBIT to east of Sepulveda and along Imperial. Is this staging/construction parking or employee parking? How will the users of their new locations arrive at their work areas? If this is permanent, how much along runway/taxiway traffic will be created?

- Page 2-39 Contains a verbal description of construction phasing including the western portion of Bradley West by mid-2013. How will this west side construction and then east side construction meet the promised needs to accommodate NLA?

- Paragraph 2.4.4.1 Contractor Staging identifies a large area for contractor parking. See the notes from the NOP and subsequent discussions with LAWA. Contractor parking in this area is unacceptable and the alternative sites should be utilized. We encourage LAWA to consider parking on the top of the CTA parking lots which we are told are underutilized at this time. If the lot on the south east is used, we encourage an entrance off Imperial beyond Main Street which would allow traffic to be inside of the fence and reduce impacts on the surrounding community.

- Paragraph 2.4.5 Airport Operational Characteristics Before and After Completion of Construction states: "The subject improvements would not increase or otherwise affect the overall operational capacity of the airport. The Bradley West

Project would not alter airspace traffic, runway operational characteristics, or the practical capacity of the airport. The LAX Master Plan evaluated the overall capacity constraints of LAX as a whole. The primary constraint on the airport's practical capacity at present is the limited curbside capacity of the CTA at peak hour, which causes the practical capacity15 to be approximately 78.7 million annual passengers (MAP).16 With the LAX Master Plan improvements, the airport's practical capacity in 2015 will be approximately the same, 78.9 MAP, based primarily on the constraints created by reducing the number of aircraft gates at the airport.17 The Bradley West Project would not change the existing curbside capacity of the CTA, nor would it exceed the aircraft gate limitations identified in the LAX Master Plan and reiterated in the Stipulated Settlement. It is anticipated that the overall level of international travel activity at LAX will increase between late 2008, when the Draft EIR Notice of Preparation was published and the time the proposed Bradley West Project improvements would be completed (2013),18 but would do so based on overall increases..." and also, "18 Based on the currently proposed construction schedule, it is anticipated that all of the Bradley West Project improvements would be completed by sometime in 2013, with the exception of completion of Taxiway T (i.e., relocation of existing Taxiway S), which would be completed by 2015. Under existing conditions (2008), there are two crossfield taxiways adjacent to TBIT; Taxiways Q and S. By 2013, there would still be two crossfield taxiways; Taxiway S (relocated Taxiway Q) and Taxiway C13 (new taxiway approved in early 2009). As such, any notable change in the operational characteristics of TBIT upon completion of the Bradley West Project, compared to existing conditions, would occur by 2013. 19 Ricondo & Associates, LAX Planning Forecast Documentation, March 2009."

We question the statement of no increased capacity based on earlier DEIR statements. Since there will be a net increase of gates, better handling of passengers, and traffic flow, how is this not an increase in capacity? We do, accept that it may not be immediately utilized due to economic conditions. While the usage during the period of 2013 may not appreciably increase it could when the economy recovers.

- Paragraph 2.6.3 Local Actions states: A number of actions to be taken by departments of the City of Los Angeles were identified in the LAX Master Plan Final EIR relating to the certification of that document, as well as approval of the LAX Master Plan, LAX Specific Plan, and the LAX Plan.

Detailed actions required for LAX Specific Plan approval such as the Executive Director Certifications was not mentioned. Is it assumed that all requirements of the Specific Plan will be separately identified and tracked?

- Section 3.1 Land Use Setting states: As indicated in Chapters 1 and 2, and depicted in Figure 1-2, the Bradley West Project site is located near the center of LAX, near the midfield portion of the airport. The subject area is, and has long been, actively used for airport operations and is completely occupied and surrounded by airport facilities. Onsite land uses include the existing TBIT and

adjacent taxiways to the west, a commuter terminal, aircraft parking areas, aircraft hangars, maintenance facilities, and various airport/airfield operations buildings. Surrounding land uses include the following:
♦ The north runway complex to the north;
♦ The Central Terminal Area (CTA) to the east;
♦ The south runway complex to the south; and
♦ A variety of airport/airfield buildings and facilities to the west.
The closest land uses in the project vicinity that are not airport-related include the following:
♦ The community of Westchester north of LAX (over 0.45 mile between the northern end of the Bradley West Project site and the nearest point in Westchester);
♦ A mix of commercial, hotel, office, and residential uses east of LAX (over 0.75 mile between the eastern edge of the Bradley West Project site and the nearest hotel on Century Boulevard and over 1.75 miles to the western edge of Inglewood);
♦ Residential, commercial, office, and institutional uses to the south (approximately 0.75 mile between the southern end of the Bradley West Project site and the northern edge of El Segundo); and
♦ Dockweiler State Beach and Santa Monica Bay to the west (over 1.75 miles between the western edge of the Bradley West Project site and Vista Del Mar).
Compatibility and consistency with applicable federal, state, and local regulations, plans and policies from operation of the airport after completion of the Bradley West Project was addressed as part of the LAX Master Plan Final EIR (see Chapter 4 of LAX Master Plan Final EIR, particularly Section 4.2, Land Use).

What are the distance from the edges of the project to the land uses with the 75 CNEL band and 65 CNEL bands? Is Dockweiler State Beach and Santa Monica Bay within these noise levels?

- Section 3.3 Development Setting contains the words: "♦ Air Quality - Similar to the noise setting, the existing air quality setting immediate to the project site is dominated by the aircraft activities described above. Other sources of existing air pollutants near the project site include ground support equipment (GSE) operations and maintenance, and vehicle traffic on and off the airfield; however, those pollutant sources are relatively minor compared to the aircraft emissions. There are no sensitive receptors at or near the project site; the closest receptors are located in the communities described in the Land Use Setting above and in Section 5.1.2 of this EIR."

The above wording is well done since the major source of pollution would be the aircraft. LAWA has been conducting an air contamination contribution study, but no results are publically available at this time. When will the study results become available? In view of recent CARB activities looking into the emissions, when will some types of controls be established?

- Paragraph 3.3.1 LAX Master Plan Development Projects contains the words: "♦ LAX Crossfield Taxiway Project (CFTP): This project includes development of a new taxiway, Taxiway C13, extending north-south between the north airfield complex and the south airfield complex, and the extension of existing Taxiway D. Also included as part of the CFTP are the construction of a new fire station/Aircraft Rescue and Firefighting Facility (ARFF), relocation of an existing aircraft Remain Overnight (RON) area, and development of a new vehicle parking lot to replace an existing lot displaced by development of Taxiway C13 and new RON area. An EIR was completed for the CFTP and the project was approved in early 2009. Construction of the CFTP is anticipated to occur between spring 2009 and summer 2010."

Given that the LAX Master Plan Alternative D calls for two crossfield taxiways, C13 and C14, please provide information as to how operations and other potential impacts will be affected by the future incorporation of these taxiways. Are there other taxiway changes contemplated in the vicinity that can impact operations around the TBIT? They should be shown in the drawings of the project.

- Paragraph 3.3.1 LAX Master Plan Development Projects contains the words: ♦ Consolidated Rental Car (RAC) Facility: This project would provide for the consolidation and centralization of rental car operations at LAX, as contemplated in the approved LAX Master Plan. LAWA has selected a consultant team to help develop the detailed planning, engineering, and design information necessary to implement this project. It is anticipated that a focused EIR tiered from the LAX Master Plan EIR will be completed for this project; however, specific project details have not yet been determined. Construction of this project is not anticipated to begin until after completion of the Bradley West Project.

Since the TBIT West Project is not to be completed until 2015 how will traffic in the CTA be impacted when the economy returns to "normal" and traffic increases? How will the onslaught of rental car buses be modified to facilitate auto travel in the CTA?

- Paragraph 3.3.2 LAX Specific Plan Amendment Study states: "The LAX Master Plan, approved by the Los Angeles City Council in December 2004, is the strategic framework for future development at LAX. The LAX Specific Plan, approved in December 2004 as part of the LAX Master Plan Program, establishes procedures for approval of all projects defined in the LAXMaster Plan Program. The approval procedures are different for a subset of the LAX Master Plan projects. These projects are commonly referred to as the Yellow Light Projects. Such projects, as delineated in Section 7.H of the LAX Specific Plan, include the following:22
♦ Ground Transportation Center (GTC);
♦ Automated People Mover (APM) 2 from the GTC to the CTA;
♦ Demolition of CTA Terminals 1, 2, and 3;
♦ North Runway re-configuration, including center taxiways; and

• On-site road improvements associated with the GTC and APM 2. And "22 Section 7.H of the LAX Specific Plan as approved in December 2004 also included the West Satellite Concourse and associated APM segments; however, those improvements were later removed from that section of the Specific Plan through a Specific Plan Amendment. As such, they are not considered to be Yellow Light Projects, which is consistent with Section V.D.1 of the Stipulated Settlement described herein."

Clarification of the footnote above and paragraph. The West Satellite Concourse was removed from the increased study projects after it was redesignated the Midfield Satellite Concourse which was not to have a new passenger or cargo entrance from the west.

- 3.3.3 LAX Development Projects Independent of the Master Plan "It is anticipated that a number of other, stand-alone construction activities at LAX that were not part of the LAX Master Plan would likely be underway concurrent with the construction of the Bradley West Project,..."

Two projects left off the list was the Dunes Restoration and the Adjacent Street Lighting in PDR which are part of the Stipulated Settlement. If these are not planned to be during this construction period, why not; when will they be completed? With the purchase of Park One, isn't it anticipated that some airport use will be done with this property before 2015? Other than Korean Airlines' cargo project, what other cargo facility enhancement projects are to done?

- Table 3.1 List of Other Related Projects was not reviewed for completeness. What was the effective date that the data for this list was collected and its sources?

- 4. SETTING, ENVIRONMENTAL IMPACTS, ANDMITIGATION MEASURES "Because the Bradley West Project was analyzed in the Master Plan EIR, this EIR is "tiered" from, and incorporates by reference, the LAX Master Plan Final EIR.24 This EIR provides project-specific information on the development of the Bradley West Project, focusing on potentially significant environmental effects that may not have been fully addressed in the prior EIR at the project level of detail..." and
"24 City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, April 2004. The Final EIR (State Clearinghouse No. 1997061047) was certified by the Los Angeles City Council on December 7, 2004."

There is disagreement as to the adequacy of a project level EIR tiered off of the 2004 Alternative D EIR which incorporates all by reference without including project detail information in this project level EIR. The initial summary did not address the 2004 Stipulated Settlement Agreement but it is mentioned subsequently. The Stipulated Settlement agreed that certain projects could go forward with only basic study per the

LAX Specific Plan. Adequacy of the Program level EIR data was not accepted as a specific element of the settlement.

- Section 4. Setting, Environmental Impacts, and Mitigation Measures states: "As described in Chapter 3 of this EIR, in addition to the Bradley West Project, several LAX Master Plan improvement projects have recently been approved or are currently undergoing project design. These projects include the Crossfield Taxiway Project, which was approved in March 2009, and the Midfield Satellite Concourse Project and the Consolidated Rental Car (RAC) Facility, which are both currently in the design process. As indicated in Chapter 3, neither the Midfield Satellite Concourse Project nor the Consolidated RAC Facility is expected to be under construction at LAX during the Bradley West Project construction period, which is anticipated to start around late 2009. Hence, these projects are not expected to contribute to cumulative construction-related impacts. The only LAX Master Plan project that is anticipated to be under construction concurrent with construction of the Bradley West Project is the Crossfield Taxiway Project..."

Again, we are disappointed that these specifically approved, agreed upon projects are not planned to be started during the TBIT West construction period and have to ask why since they provide passenger experience improvements.

- Section 4.1 On-Airport Surface Transportation, 4.1.1 Introduction, contains: "As described in Chapter 2 of this EIR, the Bradley West Project would result in terminal building, aircraft apron, and taxiway improvements at LAX to accommodate new aircraft contact gates on the west side of TBIT. These contact gates would provide a more efficient and desirable option to the existing "hardstand" aircraft parking positions where aircraft park remotely and passengers are bused to and from the terminal building. In addition, the federal inspection services (FIS) facilities, such as U.S. Customs and Border Protection services, within TBIT would be improved as part of the project to provide increased and more efficient processing of arriving international passengers...

The Fentress Design recently paid for by LAWA includes CTA parking modifications. It is on display in the Clif Moore Administration building. Why isn't this discussed at least in concept for impacts? (see some general Fantress Design notes further below as well).

- Section 4.1.2 Methodology states: "For purposes of quantifying levels of service and potential impacts associated with curbside, intersection and roadway links, this study uses the impact thresholds used for the LAX Master Plan Final EIR surface transportation analysis29 which is also consistent with the thresholds defined in Los Angeles Department of Transportation (LADOT) Traffic Study Policies and Procedures.3

As noted in the other methodology paragraphs the curbside analysis was, and should be different than normal intersection analysis. How was level of service determined and

rated? How was bus traffic incorporated into the model? How many traffic officers were assumed? Were the specific locations set aside for buses and other multi passenger vehicles actual or is it an "objective" to meet? How many times were buses in the outer lane making the inner lanes inaccessible?

- Comment about Table 4.1-2, CTA Average Daily Traffic Volumes

The ratio of average daily traffic volume to the millions of annual passengers in the year for which it was calculated fluctuated by as much as ten percent in the years covered. What assumptions were made about the auto passengers ratio for future impacts calculations and why? What assumption is made about recirculation of autos and buses who missed a drop off the first time?

- The section CTA Intersection Analysis states: "The Bradley West Project would not have an effect on the traffic volumes that directly access and stop at the other CTA terminal curbsides; thus, a detailed assessment of the linear capacity of these other terminal curbsides was not conducted. However, because TBIT-related traffic would bypass these other terminals, the key CTA roadway intersections were assessed to measure the effect that changes in the TBIT component of these intersection volumes could have on intersection traffic operations.

The assumption that CTA traffic will not impact the other terminals is not valid because autos do not know which lane they need to be in to be able to get to their TBIT destination. Many autos and buses stay to the right lanes blocking egress from the other terminals. How did the models take this into consideration?

- The traffic section of the DEIR states: "The through lane capacities are assumed to range from 300 vehicles per hour in the adjacent maneuvering lane up to 850 vehicles per hour in the outermost lanes. 45

We would expect that during peak hours the numbers would be far worse. What was actually used in the model. One has to just watch the traffic to see that the FAA planning guide is very optimistic.

- Table 4.1-14, Curbside Analysis Results - 2013 With and Without Project Roadway Level Peak Period Curbside Zone1Future 2013 With Project shows "Departures TBIT – level of service F Overall Airport2 – level of service F"

The above referenced chart says it all. LAWA could have save big dollars and done a back of the envelope analysis instead. Even with the questionable methods that may underestimate the vehicles the service is FAILURE. Why doesn't the DEIR provide alternative traffic mitigations? Were any traffic changes contemplated such as having drop off on both levels for departures or arrivals at peak times when one is underutilized?

- Comment about Table 4.3-9 Construction Projects Concurrent with Bradley West Project Peak Construction

The basis of car trips and deliveries appears to be based on the total number of employees which is estimated based on the total cost of the projects. If the estimated cost of $2 billion increases to $5 billion will all of the estimates have to be recalculated? If not, why not?

- Interesting factoid– "Freight exports (which are generally high-value items) accounted for over 80 percent of the annual economic activity generated by international flights at LAX." Section 2.1

Does this mean that if we want to hold the line on air traffic congestion we should dissuade people and encourage cargo or is this just a statement of irrelevance if most of the cargo is coming inside the belly of the passenger aircraft?

- Regarding the conduct of traffic studies of intersections outside of LAX and the list of intersections

In conducting its traffic studies, particularly at the intersection of Sepulveda and Centinela, did LAWA factor in the recently approved Entrada high-rise office complex on the Radisson Hotel property site in Culver City? Why or why not? How about the upcoming construction of Howard Hughes Center that could add half million square feet of retail/industrial/housing?

- In Appendix C-7, the preface to the traffic study the following conditional statements are made:

"It is anticipated that the aircraft arrivals and departures time schedules for the TBIT and other CTA terminals for the future "With Project" and "Without Project" conditions would be essentially the same. The scheduled aircraft would also be the same except for minor differences pertaining to the "downsizing" of four aircraft from an Airbus A-380 to a smaller Boeing 777 under the "Without Project" condition due to taxiway limitations that would preclude the larger A-380 aircraft from accessing certain TBIT gates if the Project were not constructed.

"Given the similarities in aircraft schedules for the "With" and "Without Project" conditions, it is not anticipated that the TBIT improvements described above would affect the number of daily airline passengers that would access the TBIT or any of the other terminal buildings in the CTA during the future 2013 year being analyzed for this EIR. Subsequently, it is anticipated that the daily airline passenger volumes for the "With Project" and "Without Project" conditions would be essentially the same. Based on this assumption, it is estimated that the daily roadway traffic volumes between the two future conditions would also be approximately the same."

Here is a series of four questions/comments related to the above two paragraphs from Appendix C-7:

a. Which airlines are assumed to have downsized from four Airbus A380's to Boeing 777's?
b. Were any of these airlines consulted about their plans if additional A380 capable gates were not added to TBIT? What are the names of those airlines? Did those plans include aircraft substitution for a smaller aircraft? Did those plans also include adding frequencies (additional flights) to make up for lost capacity of an A380 vs. a 777?
c. What is the tolerance in variation of daily passenger volumes between "without project" and "with project" to be considered "essentially the same"? Please provide raw numbers as well as percentages.
d. Based upon what has been publicly released to the aviation media, here is our analysis on passenger capacity differences. Seatguru.com was used as a reference for seating capacity, Wikipedia.org was used for airline fleet plans and individual airline websites were used for scheduling.

Qantas Airways (QF). A380's will replace QF's Boeing 747-400's. QF has not made any decision to order the Boeing 777 or the Airbus A350XWB. QF's A380's seat 450 passengers while their 747-400's vary in seating capacity from 307 to 412. This causes a seat difference of 107 to 38. Qantas has up to 5 daily flights- 2 to Sydney, 1 to Melbourne, 1 to Brisbane and 1 to Auckland. There is a potential for up to a daily 500-seat difference between the A380 and 747. With up to more 500 passengers, this would be a significant difference in TBIT curb front traffic.

Singapore Airlines (SQ). A380's and Boeing 777's will replace SQ's Boeing 747-400's. The seating capacity for an SQ A380 is 471 passengers. The SQ 747-400 seats 375 passengers. The 747-400 is used on the LAX-Tokyo-Singapore route. The SQ 777-300ER seats 278 passengers while the SQ 777-200ER seats 286 passengers. If SQ replaces the 747-400 with an A380 on the Tokyo route, then there is an increase of 96 seats over the current baseline. If a 777 is used, then the seat count difference is 193 (777-300ER) and 185 (777-200ER) less vs. an A380 and 97 (777-300ER) and 84 (777-200ER) less vs. a 747-400. If SQ does not replace the 747-400 with an A380 on the Tokyo route, then they could substitute two 777's that will increase TBIT curb front traffic significantly.

Emirates Airline (EK). EK currently flies the Boeing 777-200 LR (Long Range) to LAX with a 266-seat capacity. EK has been public about wanting to place the A380, for which it is the largest customer, on the LAX-Dubai route once 2 tons of extra weight is taken off of the aircraft. EK most likely will use the 489-seat

version of the A380 to fly into LAX. This is a difference of 223 seats- again a significant difference in TBIT curb front traffic.

Korean Air (KE). KE has announced that it will fly the A380 on the Seoul-LAX route. The KE A380 will replace a 333 seat Boeing 747-400. KE's A380 seating plans have not been announced. Assuming that KE has 450 seats in their A380, then there would be a 117-seat difference with the 747-400 and a 169-seat difference with the 777-300ER. Again, another significant difference.

Other airlines that operate out of TBIT that have not made their A380 seating plans and scheduling plans known include: British Airways, China Southern, Lufthansa, Malaysian and Thai. Furthermore, Air France and Virgin Atlantic, which both operate of Terminal 2, have orders for the A380. These other airlines, especially Virgin Atlantic which delayed its A380 orders to 2013 due to gate compatibility problems at LAX, can cause increases to ground traffic at LAX. Virgin does intend to operate the A380 to LAX, but it is not clear as a replacement for the two current daily flights with 747-400 and Airbus A340-600's or as a capacity increase. The latter is more likely.

Furthermore, the A380 has only 200 orders so far with little prospects for more. There are very few airports in the United States that not only can physically accommodate the A380, but also provide the passenger volume to fill the seats. Las Vegas will not make any improvements to McCarran even as a diversion airport for the A380. Only LAX, San Francisco, Chicago, New York-JFK, Washington Dulles, Miami and perhaps Atlanta will likely see A380 flights. Airlines come to LAX not for the facilities, but for the tremendous passenger volume available in the second largest metropolitan area in the United States. This is why LAX is the number origin and destination airport in the world.

Since the dawn of the Jet Age in 1958, airline passenger traffic has doubled about every 20 years. Aircraft capacity has increased. Since the 1990's, frequency has become more important in international city pairs. We see that in multiple daily flights on the same airline for Paris (Air France), Hong Kong (Cathay), Sydney (Qantas) and multiple airlines for London (American, British Airways, United, Virgin Atlantic). After 9/11, airlines have worked hard to "right size" aircraft to their routes. In the international routes, we have seen this with 747-400's being replaced by 777-300ER's as in the cases of All Nippon Airways (ANA), Japan Airlines (JAL) and Air France. Despite the economic depression of 2009, the longer-term trends of more passengers, more airplanes with more seats and more flight frequencies will continue onward and upward. The ground traffic model needs to reflect these realities. A No Project and Project will have

different numbers, with Project being significantly higher- perhaps 600 more passengers per day.

- In Appendix C-7, it is noted that the traffic data was collected in August 2008. Why was this month selected? During the NOP scoping process and a various other public meetings on LAX Master Plan issues over the years, the public has requested that traffic studies be conducted when Loyola Marymount University (LMU) is in session. A significant portion of the traffic generated by LMU goes through the intersection of LMU Drive and Lincoln Boulevard where LMU's main entrance is located. Due to the timing of the LAX traffic study, traffic on Lincoln Boulevard may be undercounted for those 9 months of the year when LMU is in regular session.
- In Appendix C-7, Exhibits 2 and 5 do not show a line for the No Project.
- In Appendix C-7, why does the line for 2013 with project spike around 14:10? For the 2008 baseline, why the line spike at 22:00?
- In Appendix C-7, Table 1 has large discrepancies between Originations and Terminations. What accounts for those discrepancies?

Comments/questions below cover the general Fentress Design concept for TBIT and are included here since this is the first project which has been brought forward as part of that design:

While the Fentress design for TBIT seeks to architecturally capture the physical essence of Southern California- sun, waves and mountains- the design creates various potential problems to be addressed:

1. Traffic flow. The new check-in building demolishes the ramps between the upper and lower level roadways. This limits an option for drivers to change levels on either side of the Central Terminal Area (CTA). The introduction of a curb face on what is the short-cut road to Terminal 5 may slow traffic circulation in the CTA that generally becomes clogged near Terminal 4.
2. Parking. The T3 and T4 parking garages will be torn down and replaced with a three-story underground parking garage. It is assumed that the only entrances to the proposed garage will be via the arrivals level. This negatively affects travelers using the departures level who will then have to circle back around to the arrivals level at the entrance to LAX thus adding congestion. It appears that the number of parking spaces may be reduced from the current number in T3 and T4.

3. Way finding. Passengers may be confused as to which check-in building to use- the new TBIT or the old TBIT for their airline? The same problem also occurs for parking.
4. Emergency access. The helipad on the T4 garage is eliminated in the design. LAFD needs a helipad for emergency evacuation on buildings over 3 stories in height. A heliport needs to be added back into the design. There is also concern about the sky bridge from the terminals to the concourses for evacuation purposes. The LAFD needs to be brought into the design process early to make certain their needs are addressed.
5. Security. The new check-in building is open on four sides to a possible terrorist attack. With a glass design, the glass must be blast glass. LAWA has yet to implement this and other recommendations from the RAND security studies on LAX. Again, LAWA should include the LAWA Police Department, TSA and CBP on designing security into any facilities- whether new construction or remodeling. Furthermore, the proposed underground parking garage and its proximity to a new Central Utilities Plant may make the proposed check-in building a highly vulnerable terrorist target.

Thank you for your consideration of these issues and we are available to discuss these in the future as you see fit. We again thank you for your efforts to make LAX safe, secure, and convenient and support this effort.

Sincerely,

Denny Schneider, President

Bradley West Draft EIR Public Hearing

June 6, 2009

NAN SCHNEIDER: My concern is that Tom Bradley doesn't add enough square footage for the newer larger aircraft in the holding areas. That, I feel that having 300 *(indecipherable speech)* holding over 800 that that is an issue.

MIKE DOUCETTE: Okay, we did a rather extensive analysis looking at the holdroom capacities aircraft and right now we have designed it for what we consider a level of service A in terms in the number of seats associated with it. Now there is some consideration or at least it has been published that in a lot of areas that these aircraft can hold 800 passengers. What we are typically seeing in the event of Qantas, at least, is about 450 passengers on these aircraft. Which is approximately 50 to 55 more than the 747s that are flying today. So there is not significantly more passengers on here, what we are seeing is significantly more business class and first class seats on. We will see aircraft that are configured up to 500/550 but these holdrooms have been upsized from what is a accepted planning standard for that size aircraft. They range approximately 6 to 7 thousand square feet in size. They provide seating for about 80 percent of the passengers and that is typical because when you look at passenger activity what you see is a number of people are either in concessions themselves or in the case of these particular aircraft with larger first class and business class you have a lot of people who are in the first class lounges. The other component to this is when you look at international activity where every gate may seem to have a plane on it but they leave at slightly different times we try to take advantage of the overlap between holdrooms. When you build contiguous holdrooms you can get efficiencies between folks that have contiguous holdrooms next to each other. So we do not as a rule provide a seat in a holdroom for every seat on the aircraft.

NAN SCHNEIDER: It just concerns me because you are going by the configurations that are current in the aircraft and the possibility that they could go up to 500. But we saw the same thing with the 747 originally they had large lounges and mostly first class places and then before you knew it there was three times the number of seats and you know the tray tables can barely come down. Its -- you have to plan out far enough in advance that you know if this comes to pass.

MIKE DOUCETTE: We believe we have taken that into account. The holdrooms themselves are about 20 percent, at least 20 percent, larger then industry standard for the current size aircraft that are flying. The other component to that is we need to look closely at the market segment that we fulfill in terms of the A380 and a lot of Asian type flights that the typical duration of the flights that come into Los Angeles for that market segment of aircraft the A380 are typically very long haul flights, 10 - 12 - 14 hour type flights. In our conversations with Airbus no one is really contemplating a seating configuration for that type of aircraft for those duration of flights.

NAN SCHNEIDER: Yet.

DENNY SCHNEIDER: Denny Schneider, President of ARSAC. I reserve the right to revise and amend my and extend my remarks I should say and you will get written comments as well. The biggest challenge that we have right now is looking at the EIR, its the Draft EIR, has the parking on the north side for the construction workers and we've discussed this in nauseating detail with several of the LAWA management. We are assured that that will not show up in the Final Draft. We want to make sure that those come that alternatives in addition to the one that's shown are also looked at such as the top floor of the CTA which would also be very convenient for Bradley which would allow workers to get there quickly is also addressed.

ROBERT ACKERMAN: Good morning, Robert Ackerman, Vice President of ARSAC. Another consideration for parking could be the former Delta Airlines parking garage down on Century and Avion Drive so it is certainly something to consider. South parking is definitely preferable to north parking, certainly makes sense with the 105 Freeway dumping out here on Imperial Highway for construction workers to go back and forth.

I would also like to continue a little bit on Nan's comment about holdrooms. One of the things that the architect did consider in the new concept for the Tom Bradley Terminal was a larger version of the A380 and you can never have enough seats in holdrooms and so certainly that should be looked at to accommodate it. And it's correct, a lot of the versions of the A380 right now have about 450 seats or so but that won't prevent some other airline in the future, usually some discount carrier when those A380s end up in the secondary market, from cramming into over 800 passengers which that aircraft can be certified for. Thank you.

DAN QUARTZSTROM: My name is Dan Quartzstrom, I live in Westchester. I just want to somewhat repeat what I said earlier. As somebody that lives north of the airport I am concerned about anything that extends any of those boundaries northward. And, I just want to make sure that in our conversations about this that the footprint for the proposed terminal is not going to be something set in stone in such a way that it precludes solutions about those runways coming south. So, I am looking for assurances that this new terminal is not going to do anything to move any of the boundaries of the airport north. Thanks.

MARK SKJERVEN: Good morning, Mark Skjerven of Playa Del Rey - resident. Just want to say fully support this program Mike. I think it is a great plan. Still leaves some flexibility on the north runway issues. Still have, again as stated before, concerns about the contractor staging area thing but I think all that could be worked out using this the Pershing site. But no, I fully support the plan, thank you very much.

DANNA COPE: Danna Cope, member of LAX Area Advisory Committee and Board Member of ARSAC but today I am speaking for myself. I'm concerned about when runways get closed for any of the construction work and that there in the past there has not been community notification that runways would be closed. We need to have very clear publication and communication with all the community areas that runways will be closed.

I also I'm with Nan on the crowding at the terminals. These aircraft I believe the Quantas people told me that the A380 is certified to fly into the Untied States with 754 people. So granted none of them are doing that right now, they are not contemplating that, but that does not mean that they don't re-change everything and start flying at least 700 people in. I am not sure that this terminal that you are building will handle that.

I also you know I think we are building an awful lot just for that one aircraft and it does seem kind of ridiculous to spend this kind of money. You do need to do something with Tom Bradley, we all agree with that. I am just not terribly sure this is the greatest thing and the other main comment I have is that you need to show on your maps where the crossfield taxiway is. That needs to be a part of this EIR to show that that is underway and so that we can see where the conflicts might come in. OK? Thank you.

DENNY SCHNEIDER: I have one on process, Denny Schneider again. For future meetings of this sorts I recommend that their be a postcard send out instead of a long letter where the dates are buried in the fine print.

MIKE DOUCETTE: Thank you. That concludes the formal testimony.

Attachment 2

Noise Comparison Analysis
A380 vs. B747

Noise Comparison Analysis
A380 vs. B747

February 11, 2009

LAX/Community Noise Roundtable

Los Angeles World Airports

Methodology

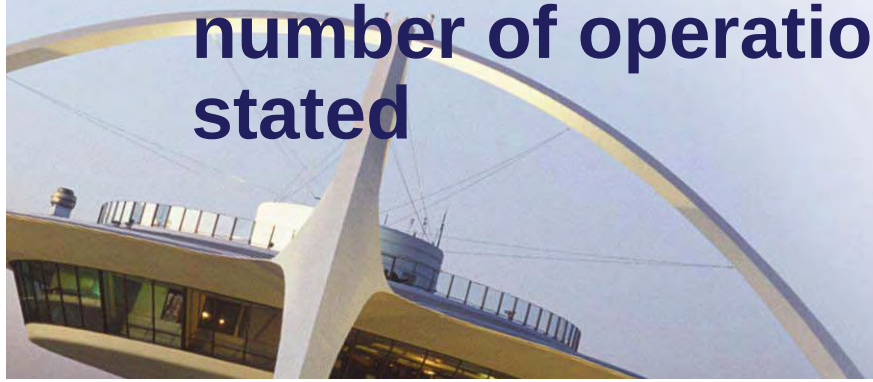
- **Comparison between B747-400 and A380 with long-haul flights:**

  LAX to Melbourne

  LAX to Sydney

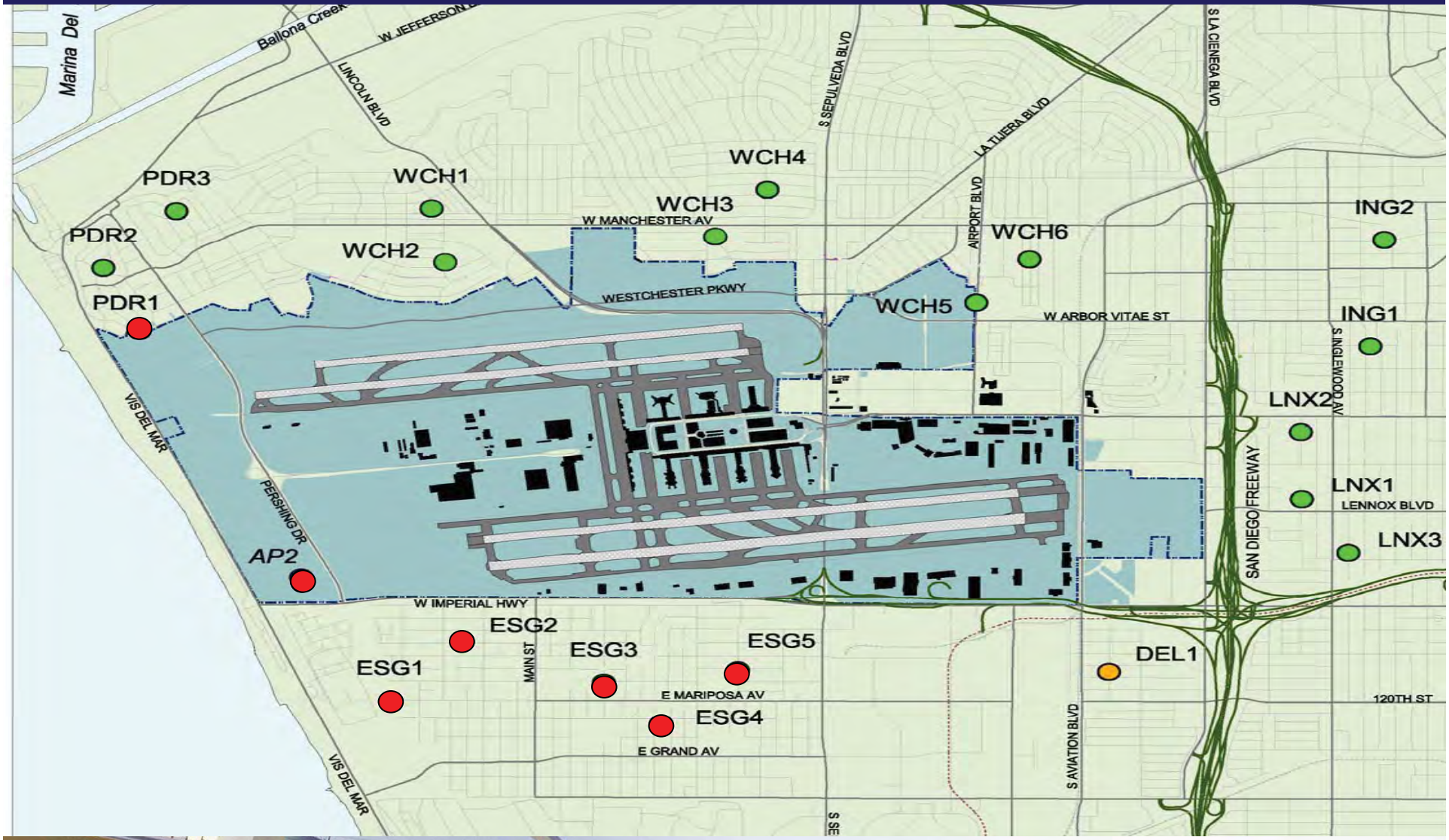
- **Comparison of noise levels from aircraft operations on the north and south runways**

- **Noise levels are averages based on a set number of operations, unless otherwise stated**



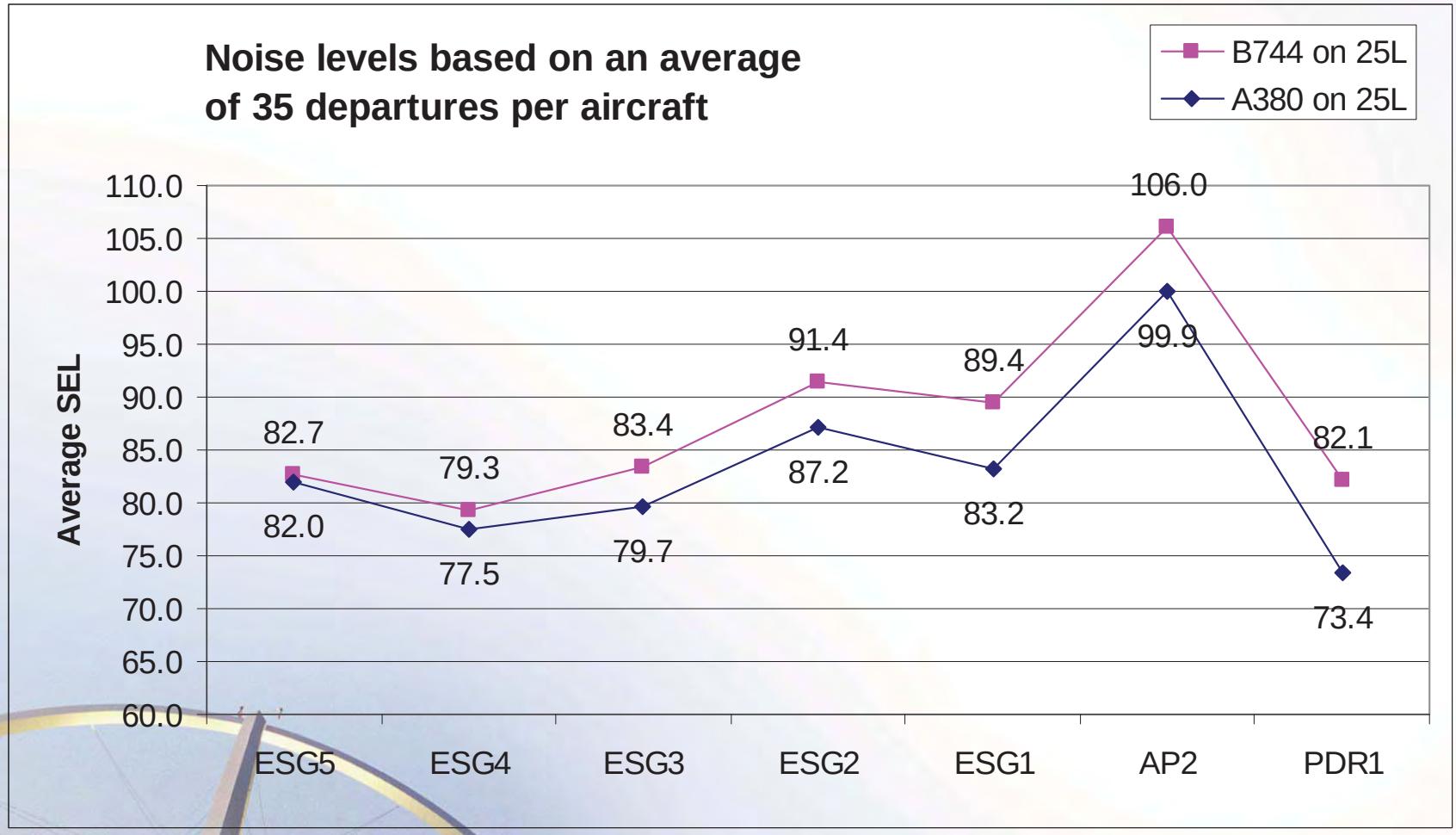
Los Angeles World Airports

Noise Monitors for 25L Departures



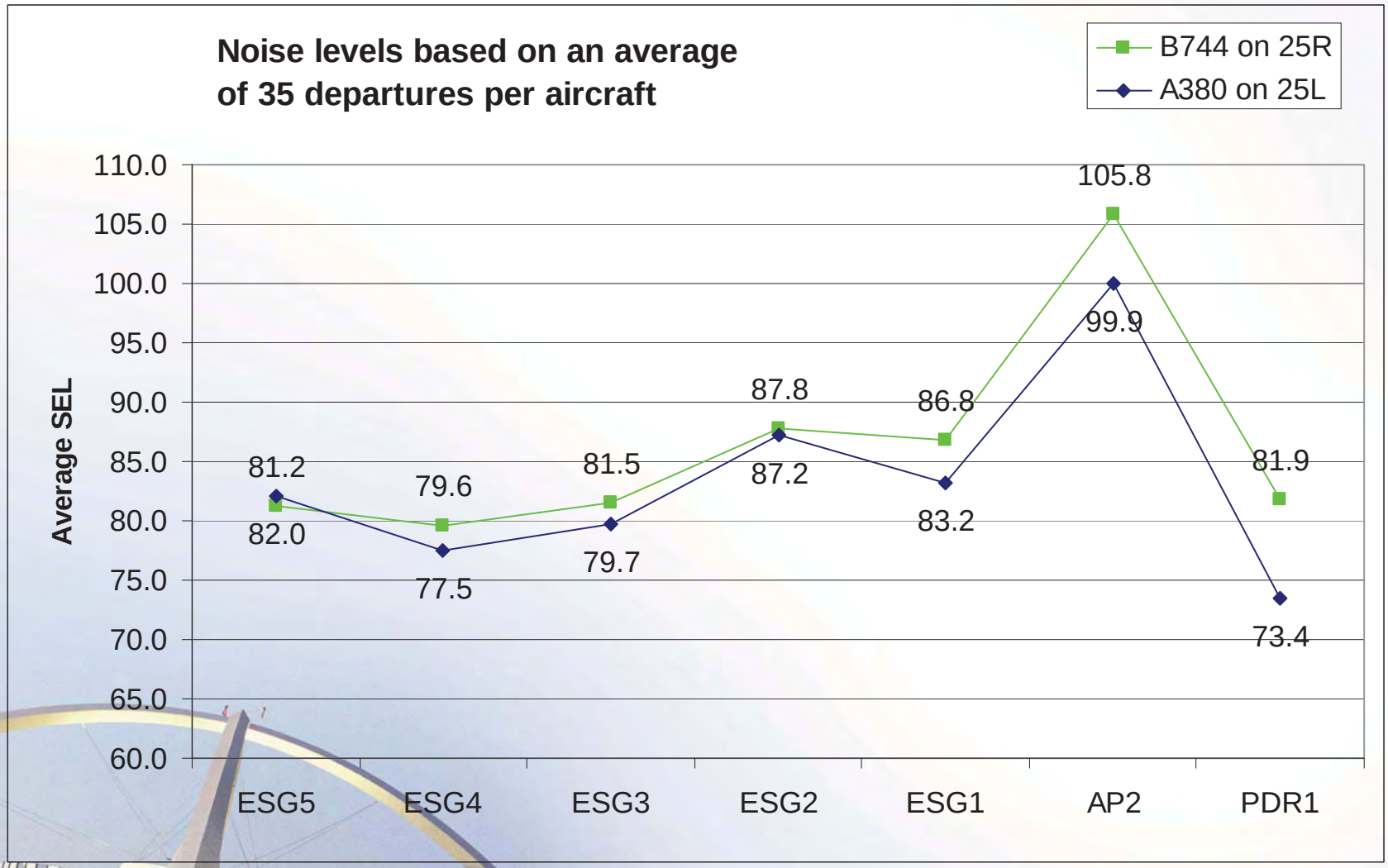
Los Angeles World Airports

Departures on 25L



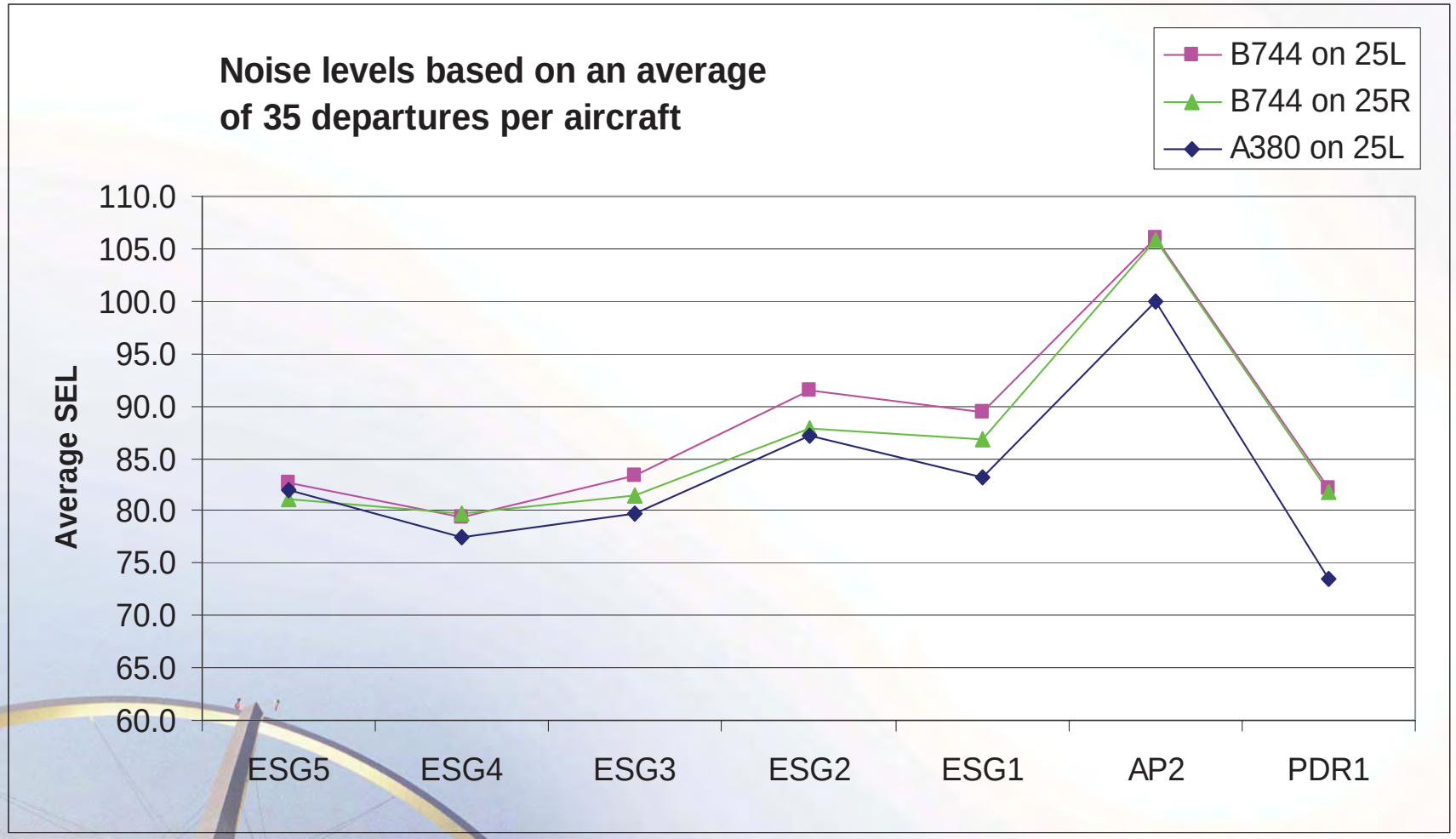
Los Angeles World Airports

Departures on 25L and 25R



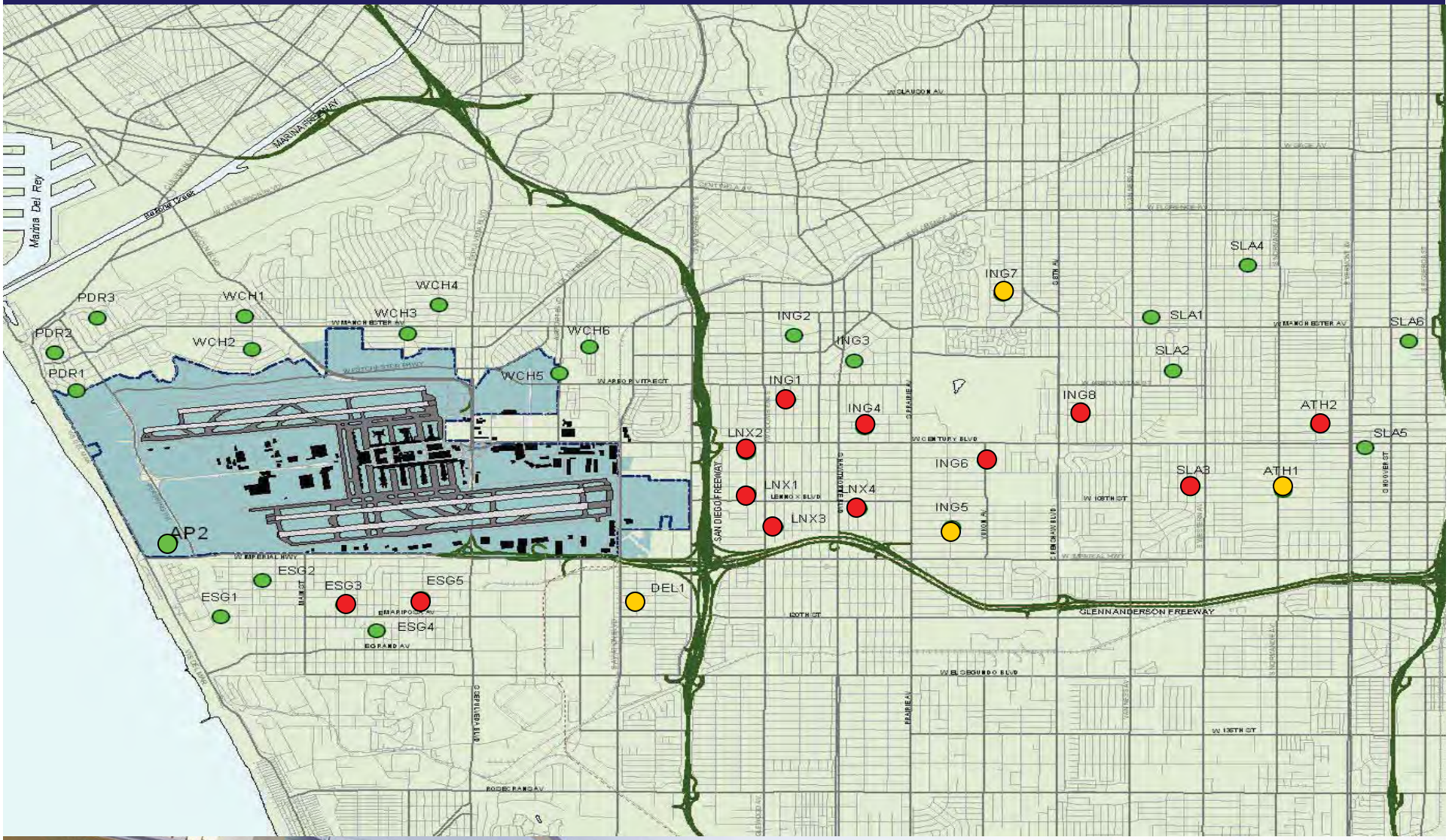
Los Angeles World Airports

Departures – All three operations



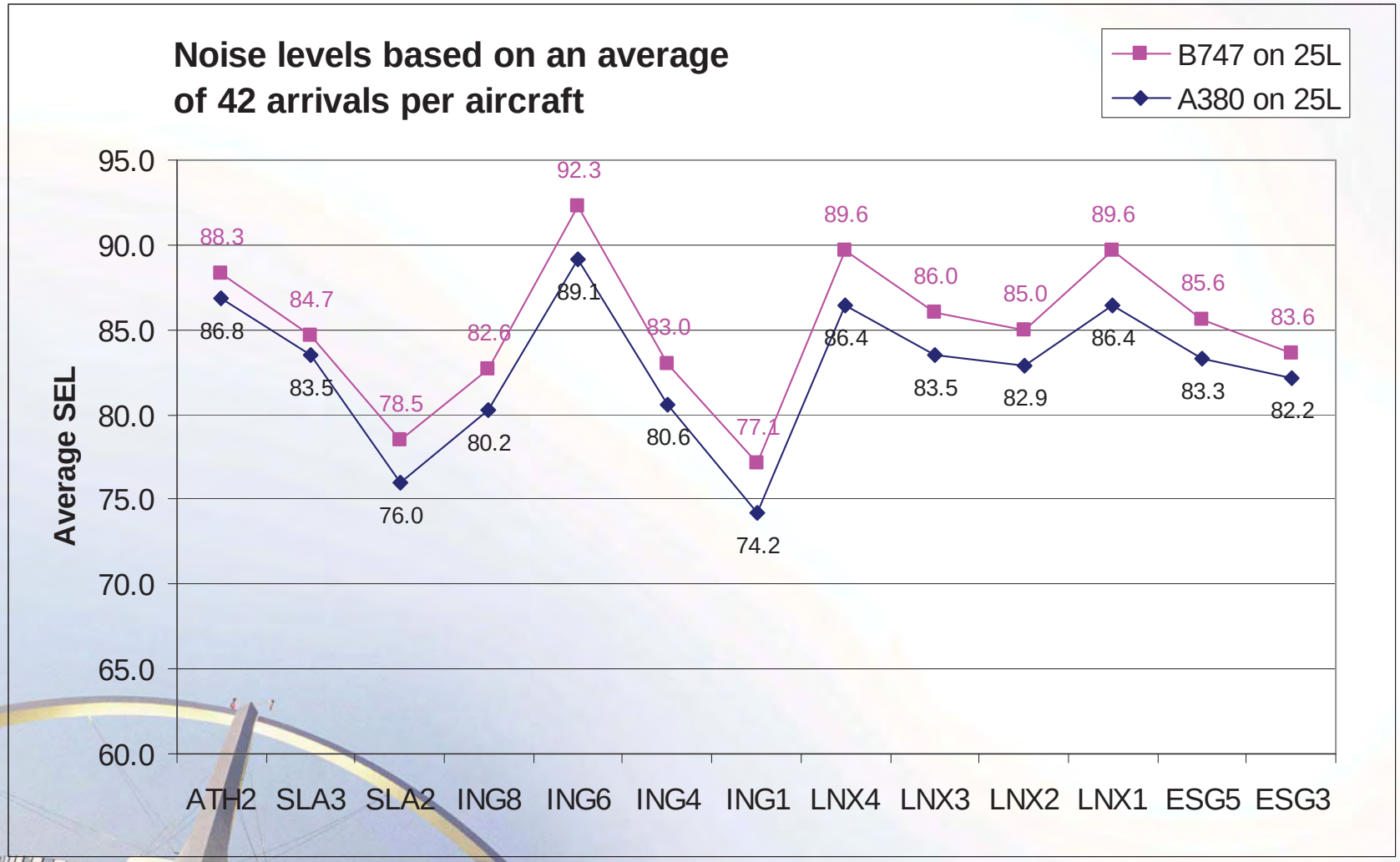
Los Angeles World Airports

Noise Monitors for 25L Arrivals



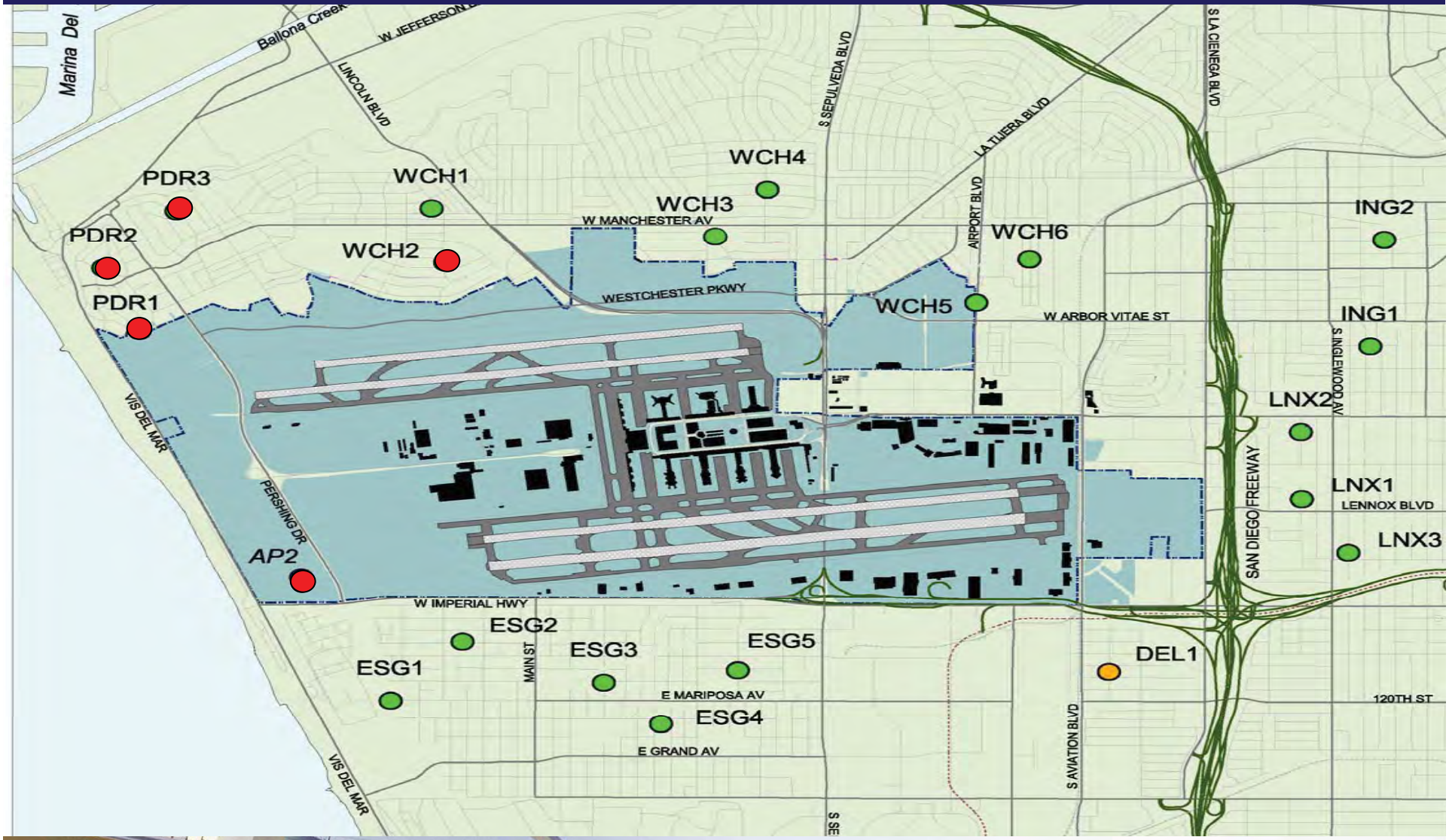
Los Angeles World Airports

Arrivals on 25L



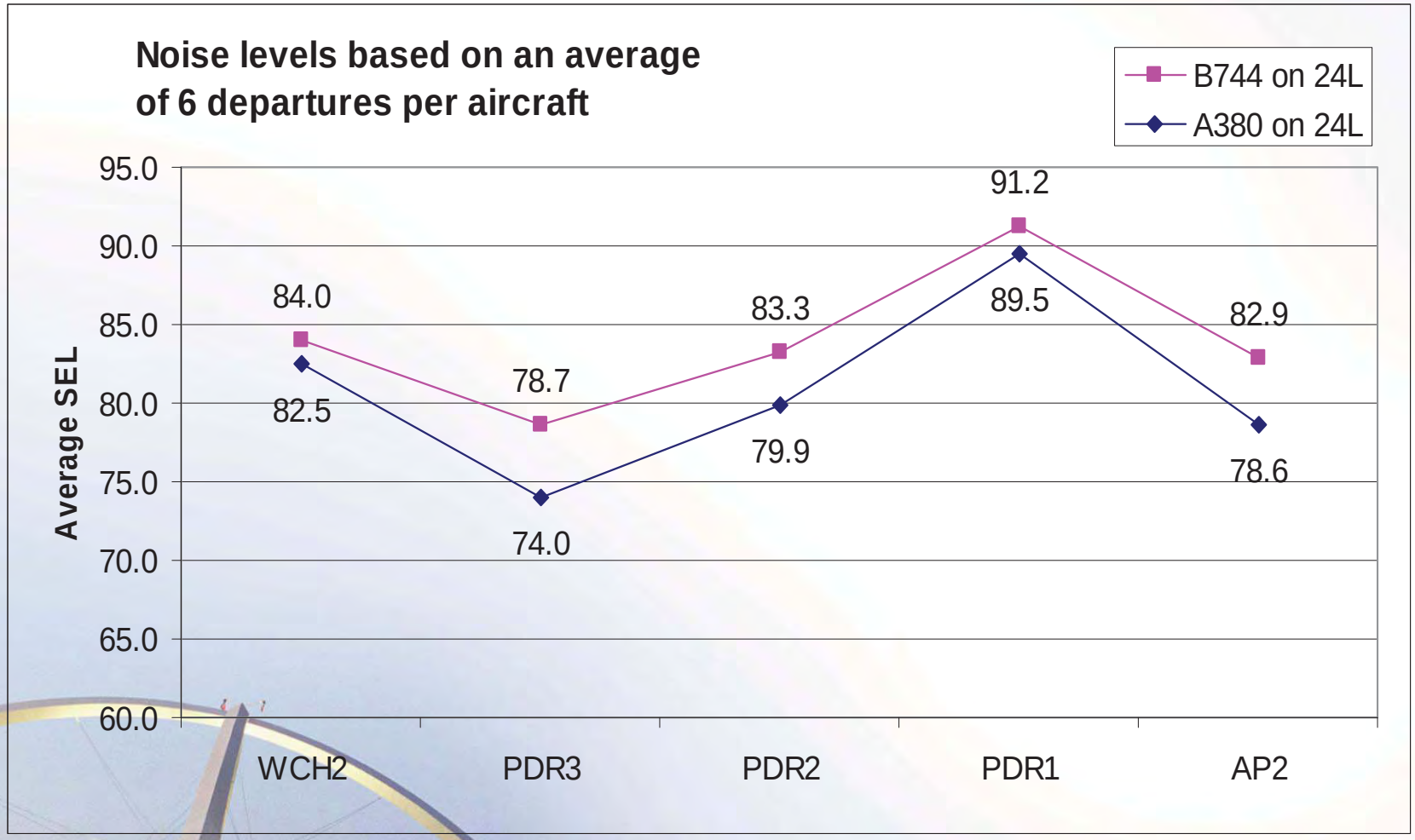
Los Angeles World Airports

Noise Monitors for 24L Departures



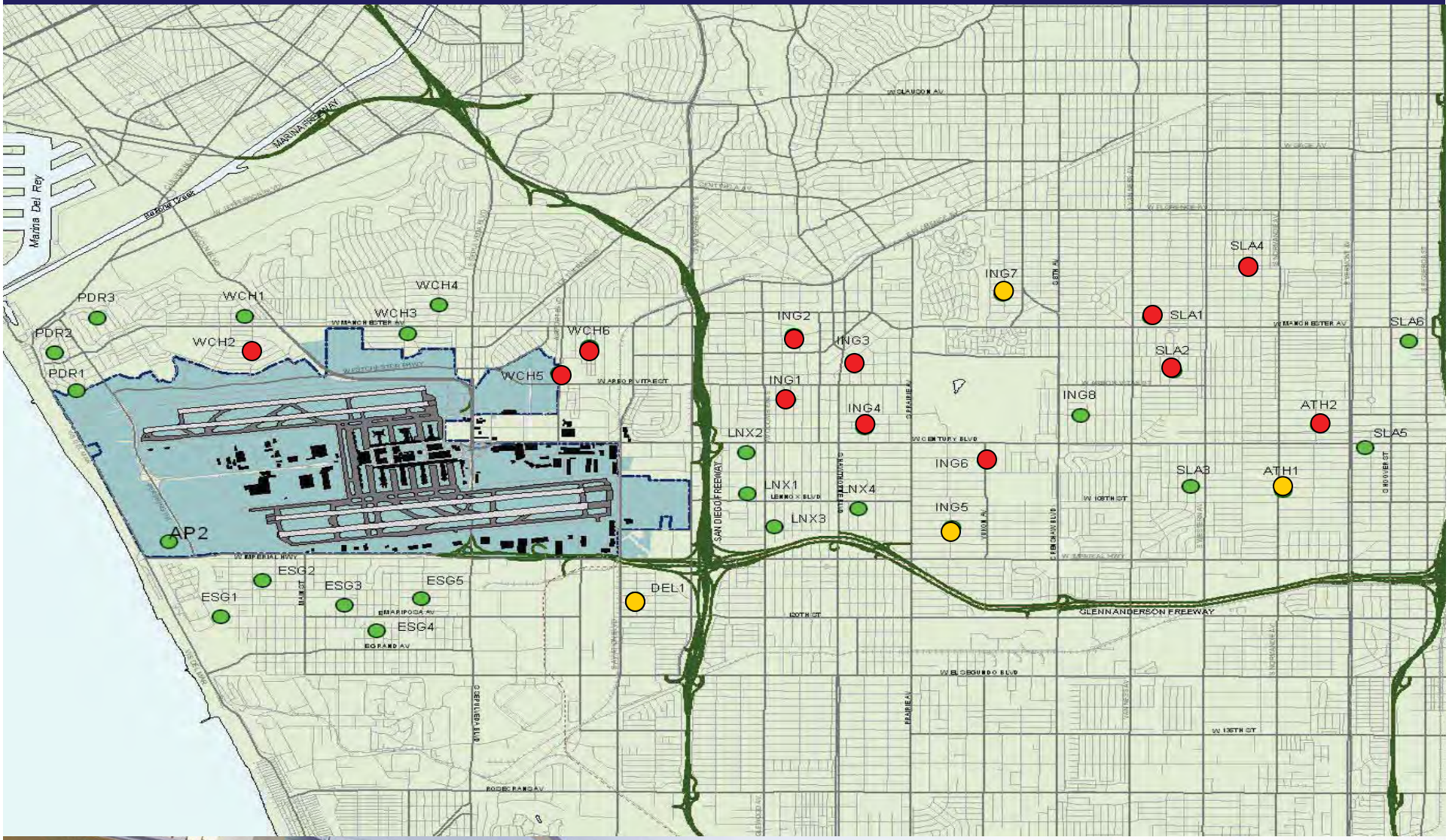
Los Angeles World Airports

Departures on 24L



Los Angeles World Airports

Noise Monitors for 24R Arrivals



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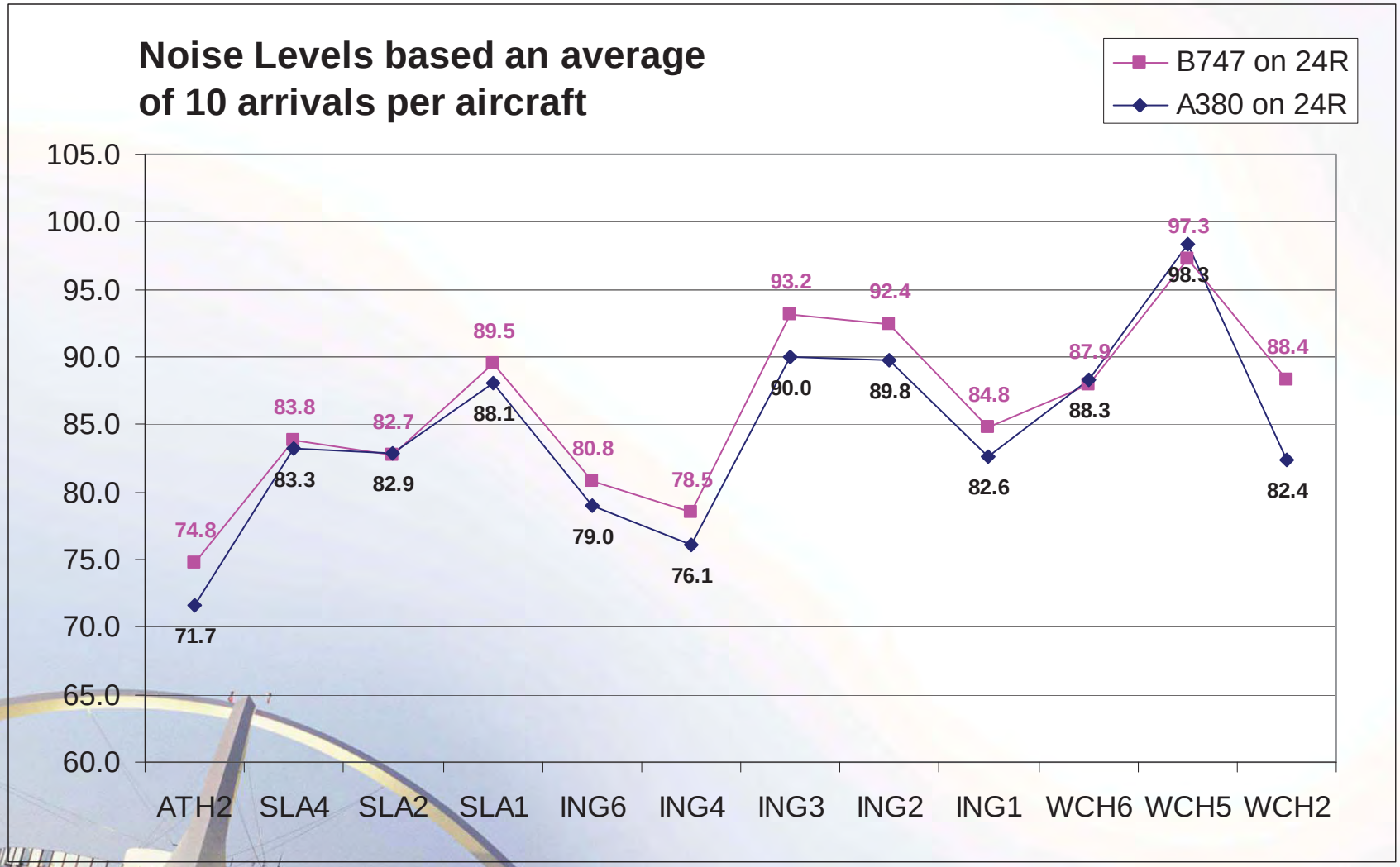
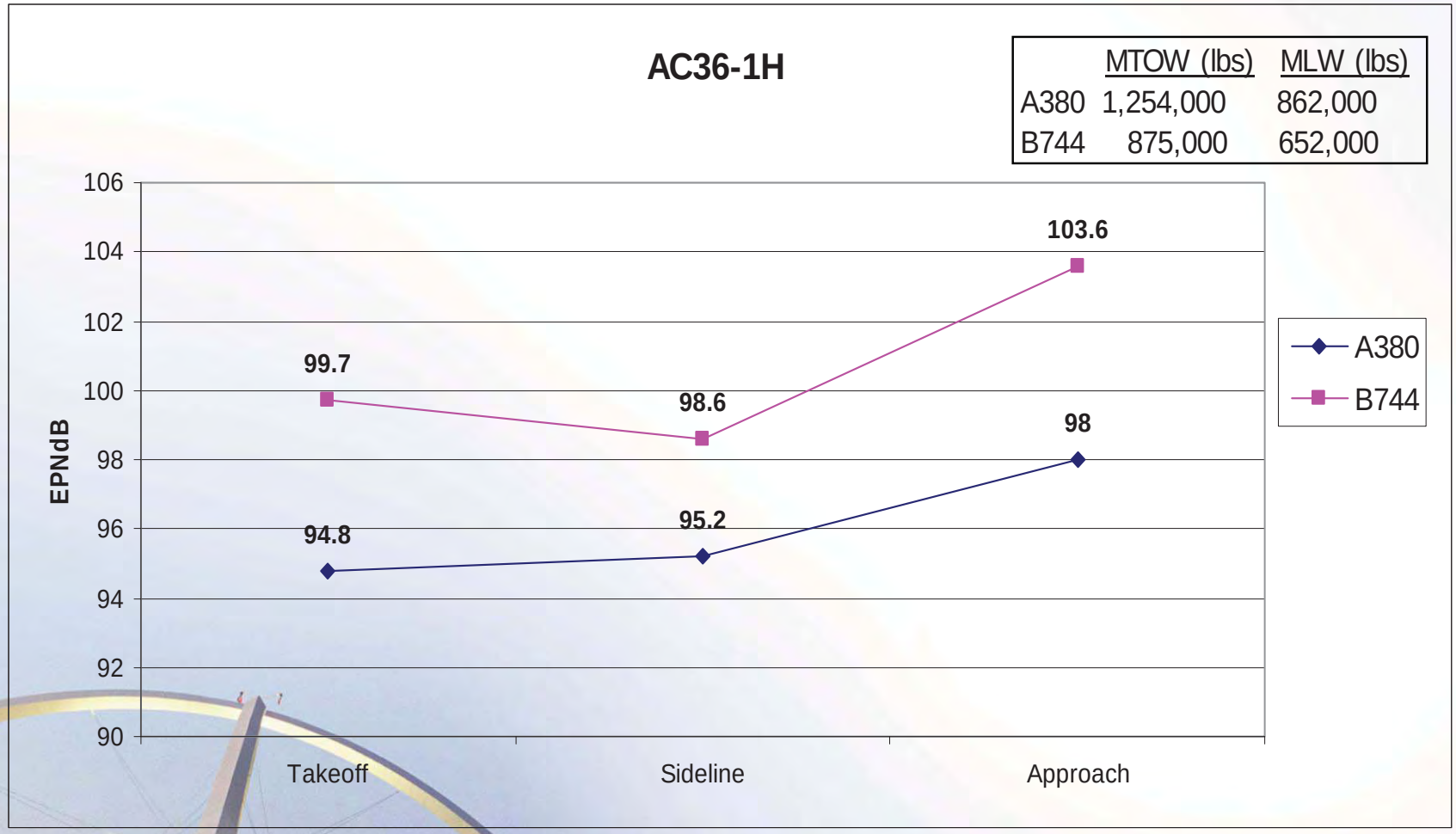
Arrivals on 24R



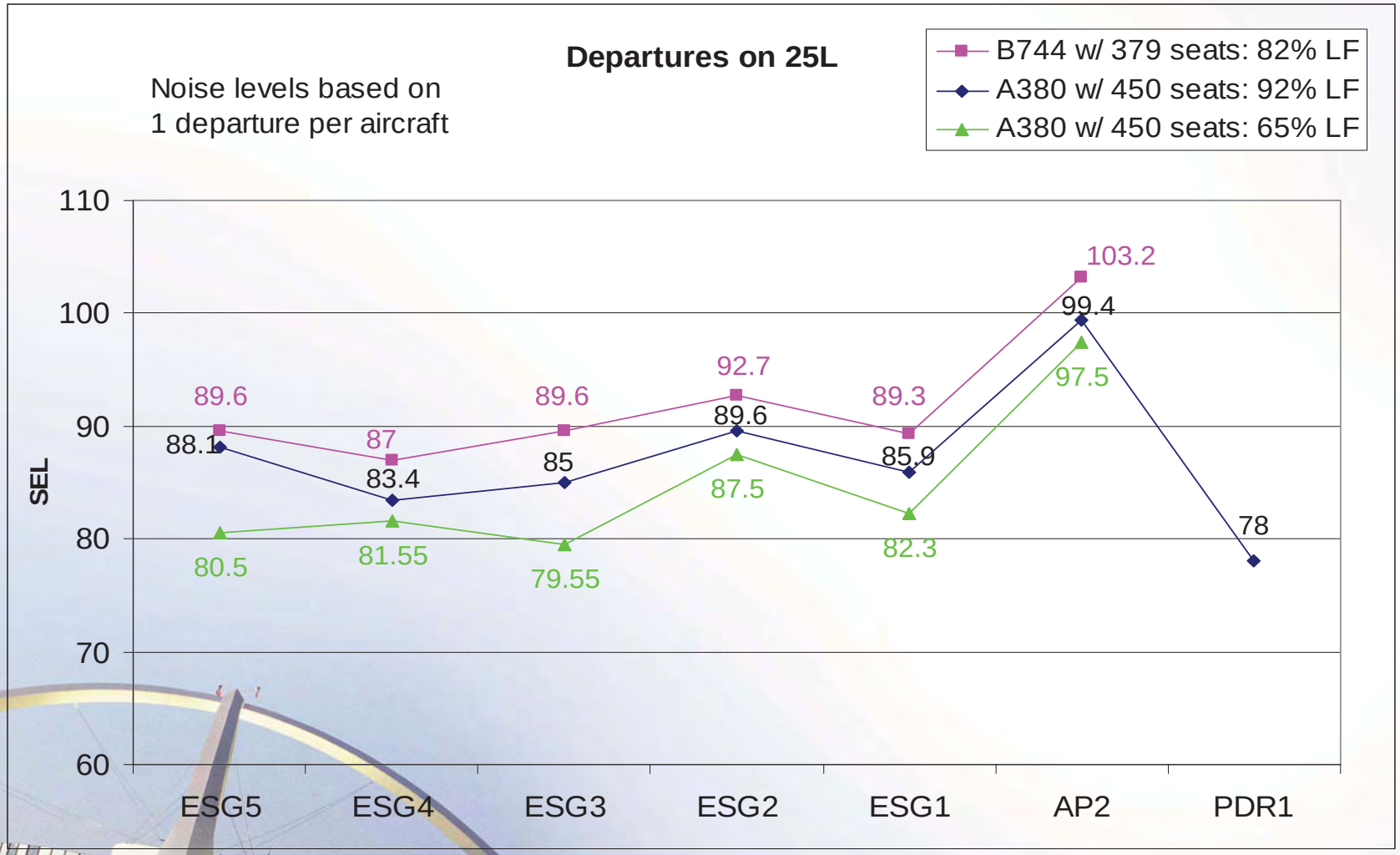
Los Angeles World Airports

FAA Certificated Noise Levels



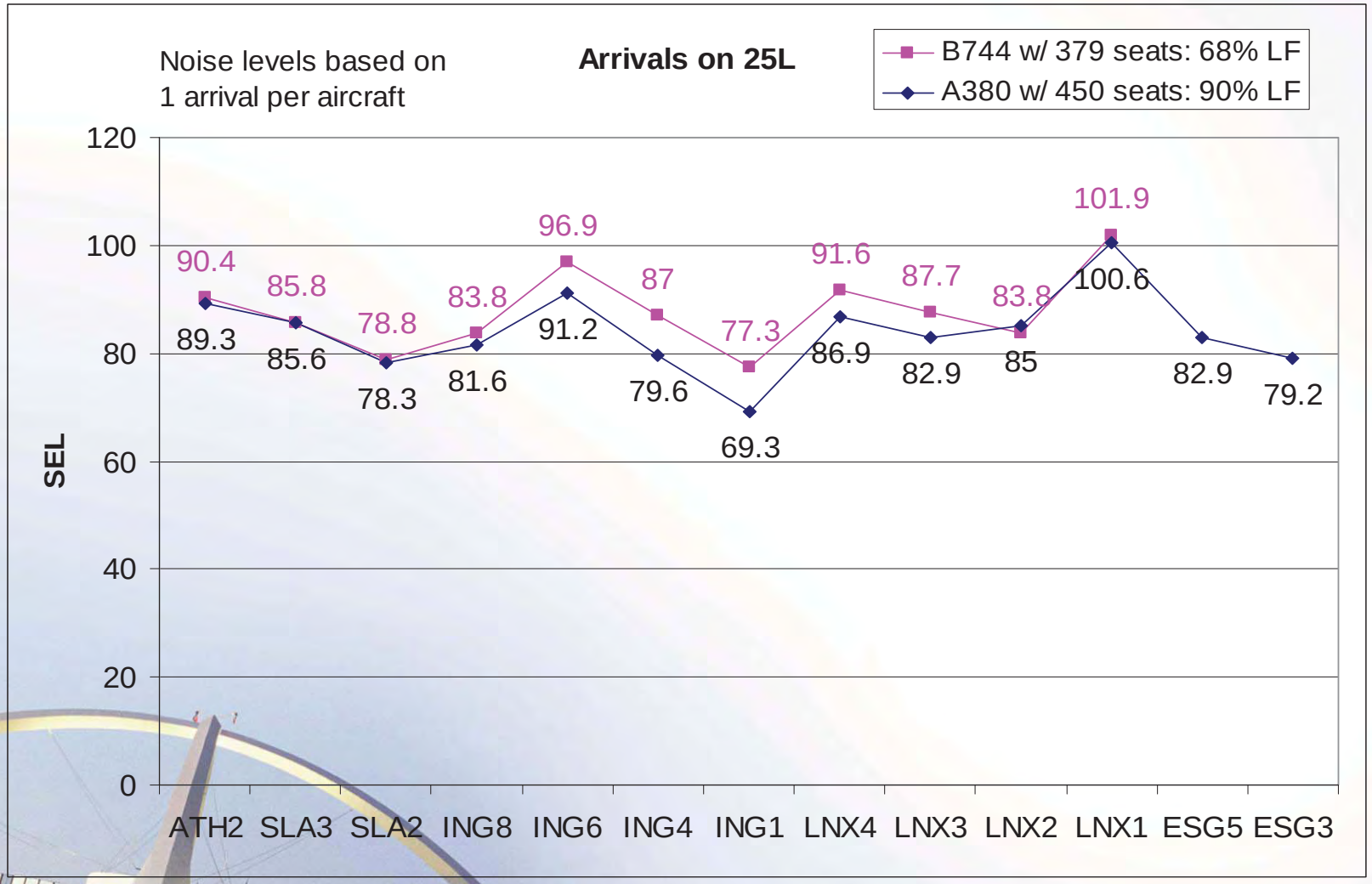
Los Angeles World Airports

Noise Comparison w/ PAX information



Los Angeles World Airports

Noise Comparison w/ PAX information



Los Angeles World Airports

Attachment 3

Engine Emission Rates

Index of Engine IDs for A380, B747-400, and Other B747

AIRCRAFT CODE	ENGINE ID	AIRCRAFT DESCRIPTION
A380-1	T97084	Airbus A380-100 Series
A380-1	XGP7XX	Airbus A380-100 Series
A380-1	XTR9XX	Airbus A380-100 Series
A380-2	XGP727	Airbus A380-200 Series
A380-2	XTR97X	Airbus A380-200 Series
A380-8	5RR040	Airbus A380-800
A380-8	6GE087	Airbus A380-800
B747-1	1GE005	Boeing 747-100 Series
B747-1	1PW020	Boeing 747-100 Series
B747-1	1PW021	Boeing 747-100 Series
B747-1	1PW022	Boeing 747-100 Series
B747-1	1PW023	Boeing 747-100 Series
B747-1	1PW024	Boeing 747-100 Series
B747-1	1PW025	Boeing 747-100 Series
B747-1	1PW029	Boeing 747-100 Series
B747-1	1PW030	Boeing 747-100 Series
B747-1	1PW032	Boeing 747-100 Series
B747-1	1PW034	Boeing 747-100 Series
B747-1	1RR006	Boeing 747-100 Series
B747-1	3GE067	Boeing 747-100 Series
B747-1	3GE068	Boeing 747-100 Series
B747-1	JT9D70	Boeing 747-100 Series
B747-1	JT9D7A	Boeing 747-100 Series
B747-1	RB524	Boeing 747-100 Series
B747-2	1GE007	Boeing 747-200 Series
B747-2	1GE008	Boeing 747-200 Series
B747-2	1GE009	Boeing 747-200 Series
B747-2	1GE020	Boeing 747-200 Series
B747-2	1GE022	Boeing 747-200 Series
B747-2	1PW020	Boeing 747-200 Series
B747-2	1PW021	Boeing 747-200 Series
B747-2	1PW022	Boeing 747-200 Series
B747-2	1PW023	Boeing 747-200 Series
B747-2	1PW024	Boeing 747-200 Series
B747-2	1PW025	Boeing 747-200 Series
B747-2	1PW029	Boeing 747-200 Series
B747-2	1PW030	Boeing 747-200 Series
B747-2	1PW032	Boeing 747-200 Series
B747-2	1PW034	Boeing 747-200 Series
B747-2	1RR004	Boeing 747-200 Series
B747-2	1RR005	Boeing 747-200 Series
B747-2	1RR006	Boeing 747-200 Series
B747-2	1RR007	Boeing 747-200 Series
B747-2	1RR008	Boeing 747-200 Series
B747-2	2GE039	Boeing 747-200 Series
B747-2	2GE041	Boeing 747-200 Series
B747-2	3GE057	Boeing 747-200 Series
B747-2	3GE058	Boeing 747-200 Series
B747-2	3GE069	Boeing 747-200 Series
B747-2	3GE071	Boeing 747-200 Series
B747-2	3GE072	Boeing 747-200 Series
B747-2	3GE073	Boeing 747-200 Series
B747-2	3GE075	Boeing 747-200 Series
B747-2	3GE076	Boeing 747-200 Series
B747-2	3GE077	Boeing 747-200 Series
B747-2	3GE079	Boeing 747-200 Series
B747-2	4GE080	Boeing 747-200 Series
B747-2	4GE081	Boeing 747-200 Series
B747-2	5GE085	Boeing 747-200 Series
B747-2	CF680C	Boeing 747-200 Series
B747-2	JT9D70	Boeing 747-200 Series
B747-2	JT9D7A	Boeing 747-200 Series
B747-2	RB524	Boeing 747-200 Series
B747-3	1GE008	Boeing 747-300 Series
B747-3	1GE009	Boeing 747-300 Series
B747-3	1GE020	Boeing 747-300 Series
B747-3	1GE022	Boeing 747-300 Series
B747-3	1PW022	Boeing 747-300 Series
B747-3	1PW029	Boeing 747-300 Series
B747-3	1PW030	Boeing 747-300 Series
B747-3	1PW032	Boeing 747-300 Series
B747-3	1RR006	Boeing 747-300 Series
B747-3	1RR007	Boeing 747-300 Series
B747-3	1RR008	Boeing 747-100SR
B747-3	2GE039	Boeing 747-300 Series
B747-3	2GE041	Boeing 747-300 Series
B747-3	3GE057	Boeing 747-300 Series
B747-3	3GE058	Boeing 747-300 Series
B747-3	3GE069	Boeing 747-300 Series
B747-3	3GE071	Boeing 747-300 Series
B747-3	3GE072	Boeing 747-300 Series
B747-3	3GE076	Boeing 747-300 Series
B747-3	3GE077	Boeing 747-300 Series
B747-3	3GE079	Boeing 747-300 Series
B747-3	4GE080	Boeing 747-300 Series
B747-3	4GE081	Boeing 747-300 Series
B747-3	5GE085	Boeing 747-300 Series
B747-3	CF680C	Boeing 747-300 Series
B747-3	JT9D70	Boeing 747-300 Series
B747-3	JT9D7A	Boeing 747-300 Series
B747-3	RB524	Boeing 747-300 Series
B747-4	1GE020	Boeing 747-400 Series
B747-4	1GE024	Boeing 747-400 Series
B747-4	1PW041	Boeing 747-400 Series
B747-4	1PW042	Boeing 747-400 Series
B747-4	1PW043	Boeing 747-400 Series
B747-4	1PW051	Boeing 747-400 Series
B747-4	1PW053	Boeing 747-400 Series
B747-4	1PW054	Boeing 747-400 Series
B747-4	1PW055	Boeing 747-400 Series
B747-4	1PW056	Boeing 747-400 Series
B747-4	1PW057	Boeing 747-400 Series
B747-4	1PW058	Boeing 747-400 Series
B747-4	1PW059	Boeing 747-400 Series
B747-4	1RR010	Boeing 747-400 Series
B747-4	1RR011	Boeing 747-400 Series
B747-4	2GE039	Boeing 747-400 Series
B747-4	2GE045	Boeing 747-400 Series
B747-4	3GE057	Boeing 747-400 Series
B747-4	3GE058	Boeing 747-400 Series
B747-4	3PW063	Boeing 747-400 Series
B747-4	3PW064	Boeing 747-400 Series
B747-4	3PW065	Boeing 747-400 Series
B747-4	4GE080	Boeing 747-400 Series
B747-4	4GE081	Boeing 747-400 Series
B747-4	4RR036	Boeing 747-400 Series
B747-4	4RR037	Boeing 747-400 Series
B747-4	5GE085	Boeing 747-400 Series
B747-4	5PW074	Boeing 747-400 Series
B747-4	CF680C	Boeing 747-400 Series
B747-4	RB524	Boeing 747-400 Series
B747-4ER	1PW043	Boeing 747-400 ER
B747-4ER	3GE057	Boeing 747-400 ER
B747-SP	1PW020	Boeing 747-SP
B747-SP	1PW021	Boeing 747-SP
B747-SP	1PW022	Boeing 747-SP
B747-SP	1PW023	Boeing 747-SP
B747-SP	1PW024	Boeing 747-SP
B747-SP	1PW030	Boeing 747-SP
B747-SP	1PW032	Boeing 747-SP
B747-SP	1RR004	Boeing 747-SP
B747-SP	1RR005	Boeing 747-SP
B747-SP	1RR006	Boeing 747-SP
B747-SP	1RR007	Boeing 747-SP
B747-SP	1RR008	Boeing 747-SP
B747-SP	JT9D70	Boeing 747-SP
B747-SP	JT9D7A	Boeing 747-SP
B747-SP	RB524	Boeing 747-SP
B747-SR	1GE005	Boeing 747-100SR
B747-SR	1PW021	Boeing 747-100SR
B747-SR	1PW022	Boeing 747-100SR
B747-SR	1PW024	Boeing 747-100SR
B747-SR	1PW030	Boeing 747-100SR
B747-SR	1PW032	Boeing 747-100SR
B747-SR	3GE067	Boeing 747-100SR
B747-SR	3GE068	Boeing 747-100SR
B747-SR	JT9D70	Boeing 747-100SR
B747-SR	JT9D7A	Boeing 747-100SR

Cells in Light Green Pertain to A380 Engines
Cells in Pink Pertain to B747-400 Engines
Cells in Blue Pertain to All Other Engines

Engine Emission Rates

	Takeoff				Taxi/Idle			
EngID	CO_REI_TO	HC_REI_TO	NOX_REI_TO	SN_TO	CO_REI_ID	HC_REI_ID	NOX_REI_ID	SN_ID
1GE005	0.50	0.70	31.00	2.90	66.00	26.00	3.30	4.60
1GE007	0.50	0.60	36.30	4.10	61.80	21.80	3.60	4.50
1GE008	0.50	0.60	35.00	3.90	62.30	23.00	3.50	4.50
1GE009	0.50	0.60	36.30	4.10	61.80	21.80	3.60	4.50
1GE020	0.52	0.07	34.38	7.80	41.65	8.99	3.79	2.34
1GE022	0.58	0.08	28.11	7.10	43.22	9.46	3.73	2.13
1GE024	0.52	0.08	27.73	7.10	44.32	9.88	3.78	2.13
1PW020	-	0.10	37.90	11.90	84.10	36.50	3.10	0.70
1PW021	-	0.10	38.70	12.30	83.60	36.10	3.10	0.70
1PW022	0.40	0.30	46.00	4.00	54.00	26.00	3.10	1.20
1PW023	0.90	-	41.70	16.00	68.60	25.90	3.20	4.80
1PW024	0.90	-	44.90	16.00	66.70	24.50	3.30	4.80
1PW025	0.20	0.20	31.60	8.00	53.00	12.00	3.00	2.40
1PW029	0.74	0.15	41.30	6.80	11.82	1.55	3.80	2.04
1PW030	0.74	0.15	45.20	7.60	11.63	1.48	3.80	2.28
1PW032	0.90	-	44.90	16.00	66.70	24.50	3.30	4.80
1PW034	0.20	0.20	31.60	8.00	53.00	12.00	3.00	2.40
1PW041	0.08	0.11	32.50	14.30	11.60	0.66	5.00	4.29
1PW042	0.44	0.06	28.10	7.80	21.86	1.92	4.80	2.34
1PW043	0.37	0.10	32.80	8.30	20.32	1.66	4.90	2.49
1PW051	0.08	0.11	32.50	14.30	11.60	0.66	5.00	4.29
1PW053	0.53	0.09	25.69	6.80	36.91	6.80	3.69	2.04
1PW054	0.52	0.08	27.02	7.30	34.54	6.02	3.77	0.01
1PW055	0.48	0.08	30.44	8.50	29.96	4.75	3.93	0.01
1PW056	0.44	0.08	32.51	9.10	28.08	4.29	3.99	0.01
1PW057	0.40	0.08	34.89	9.60	25.83	3.73	4.07	0.01
1PW058	0.35	0.10	36.30	8.40	19.51	1.53	4.90	2.52
1PW059	0.38	0.08	37.65	10.10	23.96	3.26	4.14	0.01
1RR004	1.83	0.52	47.00	17.90	82.20	50.60	3.53	0.90
1RR005	0.70	0.39	52.30	12.30	12.39	1.95	4.20	0.60
1RR006	0.66	-	41.90	14.50	81.00	54.20	3.37	0.70
1RR007	0.51	-	56.90	12.20	73.80	46.46	4.11	0.60
1RR008	1.24	0.59	59.35	12.20	9.30	1.41	4.41	0.60
1RR010	0.59	0.39	58.71	3.03	13.74	0.89	4.63	0.21
1RR011	0.87	0.34	65.84	3.03	11.75	0.74	4.78	0.21
2GE039	0.06	0.04	28.57	6.94	18.89	1.48	4.76	0.01
2GE041	0.04	0.05	24.93	6.70	20.62	1.71	4.60	0.01
2GE045	0.04	0.05	24.94	6.90	19.23	1.54	4.73	0.01
3GE057	0.05	0.05	28.58	7.40	17.45	1.31	4.91	0.01
3GE058	0.05	0.05	26.90	7.20	18.27	1.41	4.83	0.01
3GE067	0.43	0.09	25.45	11.61	24.04	2.72	3.40	1.40
3GE068	0.43	0.09	25.45	11.61	24.04	2.72	3.40	1.40
3GE069	0.43	0.15	27.17	11.53	24.04	2.72	3.40	1.40
3GE071	0.44	0.14	28.03	11.41	24.04	2.72	3.40	1.40
3GE072	0.44	0.14	28.03	11.41	24.04	2.72	3.40	1.40
3GE073	0.45	0.14	28.97	10.95	24.04	2.72	3.40	1.40
3GE075	0.45	0.14	28.97	10.95	24.04	2.72	3.40	1.40
3GE076	0.45	0.14	28.97	10.95	24.04	2.72	3.40	1.40
3GE077	0.45	0.14	28.97	10.95	24.04	2.72	3.40	1.40
3GE079	0.46	0.13	29.59	11.17	24.04	2.72	3.40	1.40
3PW063	0.23	0.03	42.35	3.38	34.34	5.07	3.81	1.01
3PW064	0.22	0.03	44.74	3.80	32.62	4.66	3.83	0.01
3PW065	0.18	0.03	53.02	5.40	25.74	3.29	4.08	0.01
4GE080	0.34	0.06	43.15	10.09	38.09	10.35	4.62	0.01
4GE081	0.04	0.04	31.28	5.90	15.05	0.92	4.77	0.01
4RR036	0.16	-	28.43	5.23	28.82	3.95	4.00	0.53
4RR037	0.18	-	31.19	5.20	26.17	3.31	4.16	0.53
5GE085	0.34	0.07	45.63	10.10	37.02	9.53	4.69	0.01
5PW074	0.20	-	22.50	11.60	24.30	1.70	4.30	0.01
5RR040	0.27	0.02	47.79	4.00	14.71	0.89	5.11	0.50
6GE087	0.12	0.04	40.41	2.80	15.66	0.52	5.64	2.50
CF680C	0.56	0.08	29.20	(1.00)	43.91	9.74	3.67	(1.00)
JT9D70	0.20	0.15	31.00	(1.00)	34.00	6.80	3.20	(1.00)
JT9D7A	0.40	0.30	46.00	(1.00)	54.00	26.00	3.10	(1.00)
RB524	0.41	0.11	37.00	(1.00)	20.30	3.07	2.68	(1.00)
T97084	0.37	-	37.19	4.09	15.11	0.21	5.05	0.77
XGP727	0.37	-	46.66	4.09	15.11	0.21	7.66	0.77
XGP7XX	0.37	-	52.00	4.09	15.11	0.21	8.50	0.77
XTR97X	0.37	-	37.19	4.09	15.11	0.21	5.05	0.77
XTR9XX	0.37	-	51.99	4.09	15.11	0.21	8.53	0.77

Takeoff								Taxi/Idle							
EngID	CO_REI_TO	EngID	HC_REI_TO	EngID	NOX_REI_TO	EngID	SN_TO	EngID	CO_REI_ID	EngID	HC_REI_ID	EngID	NOX_REI_ID	EngID	SN_ID
1RR004	1.83	1GE005	0.70	1RR011	65.84	1RR004	17.90	1PW020	84.10	1RR006	54.20	XTR9XX	8.53	1PW023	4.80
1RR008	1.24	1GE007	0.60	1RR008	59.35	1PW023	16.00	1PW021	83.60	1RR004	50.60	XGP7XX	8.50	1PW024	4.80
1PW023	0.90	1GE008	0.60	1RR010	58.71	1PW024	16.00	1RR004	82.20	1RR007	46.46	XGP727	7.66	1PW032	4.80
1PW024	0.90	1GE009	0.60	1RR007	56.90	1PW032	16.00	1RR006	81.00	1PW020	36.50	6GE087	5.64	1GE005	4.60
1PW032	0.90	1RR008	0.59	3PW065	53.02	1RR006	14.50	1RR007	73.80	1PW021	36.10	5RR040	5.11	1GE007	4.50
1RR011	0.87	1RR004	0.52	1RR005	52.30	1PW041	14.30	1PW023	68.60	1GE005	26.00	T97084	5.05	1GE008	4.50
1PW029	0.74	1RR005	0.39	XGP7XX	52.00	1PW051	14.30	1PW024	66.70	1PW022	26.00	XTR97X	5.05	1GE009	4.50
1PW030	0.74	1RR010	0.39	XTR9XX	51.99	1PW021	12.30	1PW032	66.70	JT9D7A	26.00	1PW041	5.00	1PW041	4.29
1RR005	0.70	1RR011	0.34	5RR040	47.79	1RR005	12.30	1GE005	66.00	1PW023	25.90	1PW051	5.00	1PW051	4.29
1RR006	0.66	1PW022	0.30	1RR004	47.00	1RR007	12.20	1GE008	62.30	1PW024	24.50	3GE057	4.91	1PW058	2.52
1RR010	0.59	JT9D7A	0.30	XGP727	46.66	1RR008	12.20	1GE007	61.80	1PW032	24.50	1PW043	4.90	6GE087	2.50
1GE022	0.58	1PW025	0.20	1PW022	46.00	1PW020	11.90	1GE009	61.80	1GE008	23.00	1PW058	4.90	1PW043	2.49
CF680C	0.56	1PW034	0.20	JT9D7A	46.00	3GE067	11.61	1PW022	54.00	1GE007	21.80	3GE058	4.83	1PW025	2.40
1PW053	0.53	1PW029	0.15	5GE085	45.63	3GE068	11.61	JT9D7A	54.00	1GE009	21.80	1PW042	4.80	1PW034	2.40
1GE020	0.52	1PW030	0.15	1PW030	45.20	5PW074	11.60	1PW025	53.00	1PW025	12.00	1RR011	4.78	1GE020	2.34
1GE024	0.52	3GE069	0.15	1PW024	44.90	3GE069	11.53	1PW034	53.00	1PW034	12.00	4GE081	4.77	1PW042	2.34
1PW054	0.52	JT9D70	0.15	1PW032	44.90	3GE071	11.41	1GE024	44.32	4GE080	10.35	2GE039	4.76	1PW030	2.28
1RR007	0.51	3GE071	0.14	3PW064	44.74	3GE072	11.41	CF680C	43.91	1GE024	9.88	2GE045	4.73	1GE022	2.13
1GE005	0.50	3GE072	0.14	4GE080	43.15	3GE079	11.17	1GE022	43.22	CF680C	9.74	5GE085	4.69	1GE024	2.13
1GE007	0.50	3GE073	0.14	3PW063	42.35	3GE073	10.95	1GE020	41.65	5GE085	9.53	1RR010	4.63	1PW029	2.04
1GE008	0.50	3GE075	0.14	1RR006	41.90	3GE075	10.95	4GE080	38.09	1GE022	9.46	4GE080	4.62	1PW053	2.04
1GE009	0.50	3GE076	0.14	1PW023	41.70	3GE076	10.95	5GE085	37.02	1GE020	8.99	2GE041	4.60	3GE067	1.40
1PW055	0.48	3GE077	0.14	1PW029	41.30	3GE077	10.95	1PW053	36.91	1PW053	6.80	1RR008	4.41	3GE068	1.40
3GE079	0.46	3GE079	0.13	6GE087	40.41	1PW059	10.10	1PW054	34.54	JT9D70	6.80	5PW074	4.30	3GE069	1.40
3GE073	0.45	1PW041	0.11	1PW021	38.70	5GE085	10.10	3PW063	34.34	1PW054	6.02	1RR005	4.20	3GE071	1.40
3GE075	0.45	1PW051	0.11	1PW020	37.90	4GE080	10.09	JT9D70	34.00	3PW063	5.07	4RR037	4.16	3GE072	1.40
3GE076	0.45	RB524	0.11	1PW059	37.65	1PW057	9.60	3PW064	32.62	1PW055	4.75	1PW059	4.14	3GE073	1.40
3GE077	0.45	1PW020	0.10	T97084	37.19	1PW056	9.10	1PW055	29.96	3PW064	4.66	1RR007	4.11	3GE075	1.40
1PW042	0.44	1PW021	0.10	XTR97X	37.19	1PW055	8.50	4RR036	28.82	1PW056	4.29	3PW065	4.08	3GE076	1.40
1PW056	0.44	1PW043	0.10	RB524	37.00	1PW058	8.40	1PW056	28.08	4RR036	3.95	1PW057	4.07	3GE077	1.40
3GE071	0.44	1PW058	0.10	1GE007	36.30	1PW043	8.30	4RR037	26.17	1PW057	3.73	4RR036	4.00	3GE079	1.40
3GE072	0.44	1PW053	0.09	1GE009	36.30	1PW025	8.00	1PW057	25.83	4RR037	3.31	1PW056	3.99	1PW022	1.20
3GE067	0.43	3GE067	0.09	1PW058	36.30	1PW034	8.00	3PW065	25.74	3PW065	3.29	1PW055	3.93	3PW063	1.01
3GE068	0.43	3GE068	0.09	1GE008	35.00	1GE020	7.80	5PW074	24.30	1PW059	3.26	3PW064	3.83	1RR004	0.90
3GE069	0.43	1GE022	0.08	1PW057	34.89	1PW042	7.80	3GE067	24.04	RB524	3.07	3PW063	3.81	T97084	0.77
RB524	0.41	1GE024	0.08	1GE020	34.38	1PW030	7.60	3GE068	24.04	3GE067	2.72	1PW029	3.80	XGP727	0.77
1PW022	0.40	1PW054	0.08	1PW043	32.80	3GE057	7.40	3GE069	24.04	3GE068	2.72	1PW030	3.80	XGP7XX	0.77
1PW057	0.40	1PW055	0.08	1PW056	32.51	1PW054	7.30	3GE071	24.04	3GE069	2.72	1GE020	3.79	XTR97X	0.77
JT9D7A	0.40	1PW056	0.08	1PW041	32.50	3GE058	7.20	3GE072	24.04	3GE071	2.72	1GE024	3.78	XTR9XX	0.77
1PW059	0.38	1PW057	0.08	1PW051	32.50	1GE022	7.10	3GE073	24.04	3GE072	2.72	1PW054	3.77	1PW020	0.70
1PW043	0.37	1PW059	0.08	1PW025	31.60	1GE024	7.10	3GE075	24.04	3GE073	2.72	1GE022	3.73	1PW021	0.70
T97084	0.37	CF680C	0.08	1PW034	31.60	2GE039	6.94	3GE076	24.04	3GE075	2.72	1PW053	3.69	1RR006	0.70
XGP727	0.37	1GE020	0.07	4GE081	31.28	2GE045	6.90	3GE077	24.04	3GE076	2.72	CF680C	3.67	1RR005	0.60
XGP7XX	0.37	5GE085	0.07	4RR037	31.19	1PW029	6.80	3GE079	24.04	3GE077	2.72	1GE007	3.60	1RR007	0.60
XTR97X	0.37	1PW042	0.06	1GE005	31.00	1PW053	6.80	1PW059	23.96	3GE079	2.72	1GE009	3.60	1RR008	0.60
XTR9XX	0.37	4GE080	0.06	JT9D70	31.00	2GE041	6.70	1PW042	21.86	1RR005	1.95	1RR004	3.53	4RR036	0.53
1PW058	0.35	2GE041	0.05	1PW055	30.44	4GE081	5.90	2GE041	20.62	1PW042	1.92	1GE008	3.50	4RR037	0.53
4GE080	0.34	2GE045	0.05	3GE079	29.59	3PW065	5.40	1PW043	20.32	2GE041	1.71	3GE067	3.40	5RR040	0.50
5GE085	0.34	3GE057	0.05	CF680C	29.20	4RR036	5.23	RB524	20.30	5PW074	1.70	3GE068	3.40	1RR010	0.21
5RR040	0.27	3GE058	0.05	3GE073	28.97	4RR037	5.20	1PW058	19.51	1PW043	1.66	3GE069	3.40	1RR011	0.21
3PW063	0.23	2GE039	0.04	3GE075	28.97	1GE007	4.10	2GE045	19.23	1PW029	1.55	3GE071	3.40	1PW054	0.01
3PW064	0.22	4GE081	0.04	3GE076	28.97	1GE009	4.10	2GE039	18.89	2GE045	1.54	3GE072	3.40	1PW055	0.01
1PW025	0.20	6GE087	0.04	3GE077	28.97	T97084	4.09	3GE058	18.27	1PW058	1.53	3GE073	3.40	1PW056	0.01
1PW034	0.20	3PW063	0.03	3GE057	28.58	XGP727	4.09	3GE057	17.45	1PW030	1.48	3GE075	3.40	1PW057	0.01
5PW074	0.20	3PW064	0.03	2GE039	28.57	XGP7XX	4.09	6GE087	15.66	2GE039	1.48	3GE076	3.40	1PW059	0.01
JT9D70	0.20	3PW065	0.03	4RR036	28.43	XTR97X	4.09	T97084	15.11	1RR008	1.41	3GE077	3.40	2GE039	0.01
3PW065	0.18	5RR040	0.02	1GE022	28.11	XTR9XX	4.09	XGP727	15.11	3GE058	1.41	3GE079	3.40	2GE041	0.01
4RR037	0.18	1PW023	-	1PW042	28.10	1PW022	4.00	XGP7XX	15.11	3GE057	1.31	1RR006	3.37	2GE045	0.01
4RR036	0.16	1PW024	-	3GE071	28.03	5RR040	4.00	XTR97X	15.11	4GE081	0.92	1GE005	3.30	3GE057	0.01
6GE087	0.12	1PW032	-	3GE072	28.03	1GE008	3.90	XTR9XX	15.11	1RR010	0.89	1PW024	3.30	3GE058	0.01
1PW041	0.08	1RR006	-	1GE024	27.73	3PW064	3.80	4GE081	15.05	5RR040	0.89	1PW032	3.30	3PW064	0.01
1PW051	0.08	1RR007	-	3GE069	27.17	3PW063	3.38	5RR040	14.71	1RR011	0.74	1PW023	3.20	3PW065	0.01
2GE039	0.06	4RR036	-	1PW054	27.02	1RR010	3.03	1RR010	13.74	1PW041	0.66	JT9D70	3.20	4GE080	0.01
3GE057	0.05	4RR037	-	3GE058	26.90	1RR011	3.03	1RR005	12.39	1PW051	0.66	1PW020	3.10	4GE081	0.01
3GE058	0.05	5PW074	-	1PW053	25.69	1GE005	2.90	1PW029	11.82	6GE087	0.52	1PW021	3.10	5GE085	0.01
2GE041	0.04	T97084	-	3GE067	25.45	6GE087	2.80	1RR011	11.75	T97084	0.21	1PW022	3.10	5PW074	0.01
2GE045	0.04	XGP727	-	3GE068	25.45	CF680C	(1.00)	1PW030	11.63	XGP727	0.21	JT9D7A	3.10	CF680C	(1.00)
4GE081	0.04	XGP7XX	-	2GE045	24.94	JT9D70	(1.00)	1PW041	11.60	XGP7XX	0.21	1PW025	3.00	JT9D70	(1.00)
1PW020	-	XTR97X	-	2GE041	24.93	JT9D7A	(1.00)	1PW051	11.60	XTR97X	0.21	1PW034	3.00	JT9D7A	(1.00)
1PW021	-	XTR9XX	-	5PW074	22.50	RB524	(1.00)	1RR008	9.30	XTR9XX	0.21	RB524	2.68	RB524	(1.00)

Cells in Light Green Pertain to A380 Engines
Cells in Pink Pertain to B747-400 Engines
Cells in Blue Pertain to All Other Engines