Final Environmental Impact Report (Final EIR)

[State Clearinghouse No. 2012041003]

for

Los Angeles International Airport (LAX)
Northside Plan Update

Part V

Errata to Responses to Comments, Corrections and Additions, and Final EIR Appendix B

City of Los Angeles
February 2015

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ERRATA TO RESPONSES TO COMMENTS IN PART III AND IV OF THE LAX NORTHSIDE PLAN UPDATE FINAL EIR

Introduction

The following corrections are hereby made to the text of Part III and IV of the LAX Northside Plan Update Final EIR. Changes in text are signified by strikeouts where text is removed and by italics where text is added, unless otherwise noted.

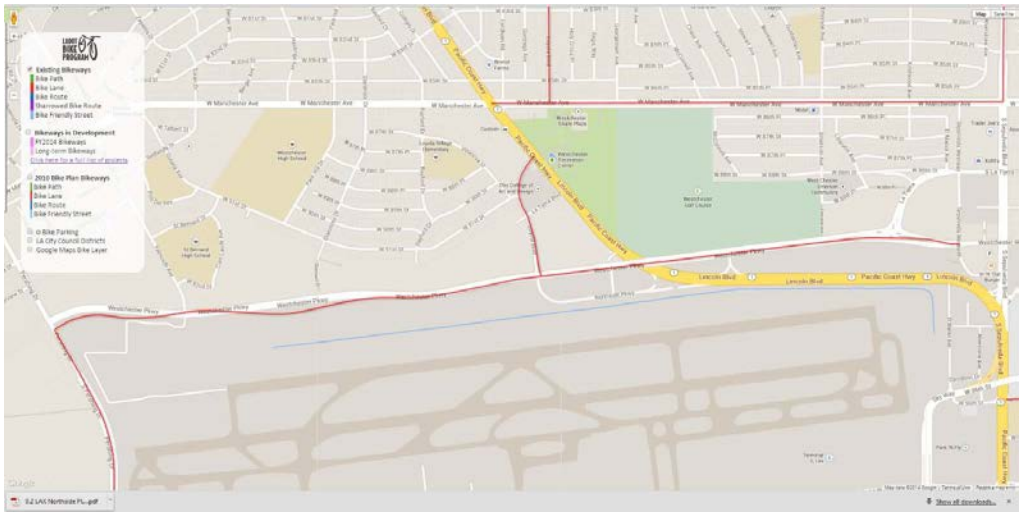
1. Response to Comment LAXN-AL05-3 on page 2-44 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

LAXN-AL05-3
Comment:

The DEIR Fails to Identify, and Thus Fails to Analyze Potential Impacts on, Most Existing and Proposed Bikeways in the Vicinity of the Project

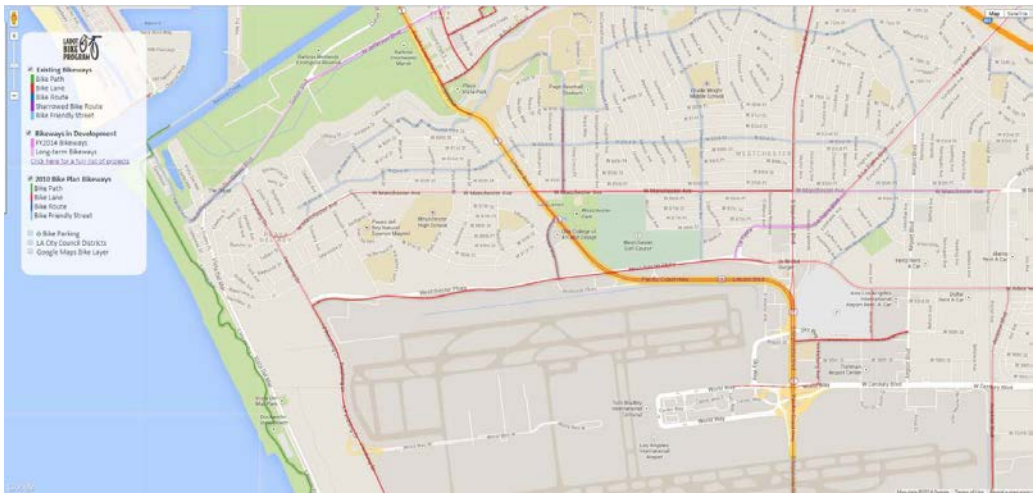
To determine whether the Project conflicts with the 2010 Bike Plan regarding bicycle facilities, the DEIR must first correctly identify the existing and proposed bikeways in applicable plans. Because the DEIR does not do so, its analysis is by definition inadequate. Quite simply, the DEIR cannot evaluate impacts on bikeway projects that it does not acknowledge even exist.

The DEIR ignores most of the existing or potential on-street bikeways in the immediate vicinity of the project. According to the DEIR, "there are currently dedicated bicycle lane on Westchester Parkway and Pershing Drive adjacent to the Project Site." The map below, from the LADOT Bicycle Program website, http://www.bicyclela.org, shows that there are also existing bike lanes on Manchester Avenue and Loyola Drive adjacent to the Project Site.



The DEIR also states that "bicycle routes are proposed by the *2010 Bicycle Plan* on Loyola Boulevard and Emerson Avenue adjacent to the Project Site." This description omits most of the 2010 Bike Plan's proposed bikeways in the vicinity of the project. The map below shows "Bikeways in Development" and "2010 Bike Plan Bikeways" (http://www.bicyclela.org/fullscreenmap.html). LADOT is currently developing bikeways

on La Tijera Blvd through and to the east of the project, and bikeways on Manchester Avenue east of Sepulveda (just outside the Project Area). In the future, bike lanes are proposed on Pershing Drive north of Manchester, on Lincoln Blvd (PCH), and Sepulveda Boulevard.



None of these proposed bike lane projects are mentioned, and the DEIR thus fails to consider whether the Project will have impacts on these bike facilities. That renders the DEIR legally inadequate.

Moreover, the 2010 Bike Plan proposes that Loyola Boulevard and Emerson Avenue be developed as Bicycle-Friendly Streets, not bike routes. A standard bike route consists of nothing more than signage, and does not reconfigure the roadway at all. Under the 2010 Bike Plan, a Bicycle-Friendly Street must "include at least two traffic-calming engineering treatments in addition to signage and shared lane markings" (2010 Bike Plan, p. 3-49). As part of the Neighborhood Network, these streets are intended to provide a comfortable riding experience for bicyclists of all experience levels, including children, women, families, young adults and seniors (in bike planning, these are sometimes referred to as streets for "8 to 80" year old bicyclists).

This distinction is critically important for analyzing the potential impacts of the Project. If analyzed as a "bike route," the question is whether the Project will prevent the City from installing "Bike Route" signs. In nearly every case, the answer would clearly be "no." If analyzed as a Bicycle-Friendly Street, the question is whether the Project might increase traffic volumes or vehicle speeds such that the street becomes less comfortable for an 8-year-old or 80-year-old bicyclist. Those are far different questions; the DEIR does not begin to address the latter, and thus is deficient.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

The comment is correct that the Draft Environmental Impact Report does not identify existing on-street bicycle lanes on Manchester Avenue and Loyola Boulevard. However, the lanes on Manchester Avenue are only adjacent to a small section of Area 12B, which is the existing Westchester Golf Course, and no changes are proposed to this Area as part of the Project. According to the website cited in the comment (www.bicyclela.org), the existing bicycle lanes on Loyola Boulevard were installed on May 20, 2014, 5 days after the release of the Draft Environmental Impact Report (May 15, 2014). Further, the discussion of existing conditions within the Study Area is intended to represent conditions

at the time the Notice of Preparation (NOP) was filed on April 4, 2012.

The Draft Environmental Impact Report did refer to Emerson Street and Loyola Boulevard as being proposed for bicycle routes, rather than bicycle-friendly streets. However, these facilities have not been designed, scheduled, or funded for implementation on either street, and it is impossible to know how those changes, if they are ever implemented, may affect vehicular traffic on those streets. In the case of Emerson Street, it is currently closed to through traffic and thus will not be affected by Project traffic. Loyola Boulevard is designated as a collector street, but is far wider than a typical collector with approximately 64 feet of pavement curb-to-curb (a collector is typically 48 feet wide). Unlike most of the streets that the *2010 Bicycle Plan* intends to add bicycle facilities to, Loyola Boulevard is wide enough to accept bicycle facilities and maintain vehicular capacity. The intersections of Loyola Boulevard & Westchester Parkway and Lincoln Boulevard & Loyola Boulevard are both projected to operate at LOS A or B during both the morning and afternoon peak hours under Future with Project with Mitigation Conditions (year 2022), as shown in Table 4.14-15 on pages 4.14-114 through 4.14-121. Therefore, even should the traffic speeds be increased or capacity on Loyola Boulevard be reduced to accommodate features of a bicycle friendly street, the traffic volumes on this street are light enough – even with proposed Project traffic added – to still operate at acceptable conditions. The proposed Project would not inhibit the ability to install features of a bicycle friendly street on either Loyola Boulevard or Emerson Street.

~~The City of Los Angeles has not established the types of impact criteria cited in the comment.~~ As described in Section 4.9.3.3.1 of the Draft EIR, LAWA will comply with bicycle policies and plans in the vicinity of LAX. The Project site will not preclude the installation of bicycle facilities identified in the *2010 Bicycle Plan, and as discussed above impacts under CEQA are based upon comparison to existing conditions. (CEQA Guidelines Section 15125(a) and 15126.2(a).).* ~~Further analysis or implementation of bicycle facilities is beyond the purview of this project.~~

2. Response to Comment LAXN-AL05-4 on page 2-47 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

LAXN-AL05-4
Comment:

<u>The DEIR Ignores The Project's Significant Impacts On Bicyclists Construction Impacts</u>
The DEIR fails to analyze the impacts that Project construction would have on bicyclists. For example, the DEIR states that the Project's primary haul routes are three streets with existing or under- development bike lanes: Manchester, Pershing and La Tijera (p. 4.14-44). Because the DEIR does not acknowledge the bike lanes on Manchester or La Tijera, or proposed lanes on Pershing north of Westchester Parkway, the DEIR cannot possibly have evaluated those impacts. Moreover, the DEIR states that construction likely will result in sidewalk and lane closures on Manchester and Lincoln Blvd, streets with existing or proposed bike lanes that the DEIR ignores. The street closures, in particular, will have a significant, adverse impact on bicyclists.

In Los Angeles, lane closures on streets with bike lanes typically involved closing the bike lanes themselves, and forcing bicyclists to ride in mixed-flow lanes with motor vehicles. On high-speed streets such as Manchester and Lincoln, that puts bicyclists in danger. Such closures often result in localized congestion, in which enraged motorists engage in aggressive, hostile driving. The DEIR says that unspecified "provisions would also be made to incorporate safety precautions for pedestrians and bicyclists . . . to the extent feasible." Through its lack of specificity, the DIER fails to provide bicyclists any assurance that the impacts on bicyclists will be mitigated.

A genuine mitigation measure would be specific. At a minimum, the DEIR must commit LAWA to the following during construction:

1. No bicycle lane will be closed, and no "shareable" lane will be narrowed, without full compliance with all state, federal and local regulations regarding closure of a bike lane, including all required temporary lane closure markings.
2. Whenever a bicycle lane is closed, it will be inspected multiple times per day to ensure that the lane closure is properly marked and signed.
3. To ensure that the bike lanes are closed properly, any permit for a lane closure should impose a penalty to be deposited into the City's Bicycle Plan Trust Fund.
4. When and where a bike lane is temporarily closed, a law enforcement officer will be stationed at the location to ensure that motorists comply with all applicable provisions of the California Vehicle Code, including section 21760 (the Three Feet for Safety Act) and 21703 (safe following distance).

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. *As noted in the previous response impacts under CEQA are based upon a comparison to existing conditions. (CEQA Guidelines Section 15125(a) and 15126.2(a).)*

The comment erroneously states that the Project proposes a construction haul route on Manchester Avenue. As stated on page 4.14-44 of the Draft Environmental Impact Report, three primary haul routes were identified for exported fill material, including Pershing Drive to Imperial Highway to I-105, Sepulveda Boulevard to I-105, and La Tijera Boulevard to I-405. Figure 21 on page 275 of *Transportation Study for the LAX Northside Plan Update* (Gibson Transportation Consulting, Inc., May 2014), provided as Appendix E to the Draft Environmental Impact Report, graphically depicts these haul routes, and doesn't include traffic on Manchester Avenue. The comment states that La Tijera Boulevard has "existing or under development bicycle lanes." There are no existing bicycle lanes on La Tijera Boulevard, and though they are proposed as part of the City's *2010 Bicycle Plan*, they are not designed, scheduled, or funded and therefore it is unknown what effect their eventual implementation may have on La Tijera Boulevard. Regardless, haul truck traffic travels in vehicular travel lanes just like any other vehicle, and has no direct effect on bicycle traffic traveling in dedicated bicycle lanes. *Furthermore, many of these routes have been utilized as construction haul routes for numerous ongoing projects at LAX over numerous years. (LAX Bradley West EIR (published May 2009, certified September 2009), Section 2.4.4.3 ["…the primary delivery routes include Imperial Highway, Pershing Drive, and World Way West."], LAX Specific Plan Amendment Study EIR, page 4-1281 (published in 2012 and certified in 2013) ["Designated Truck Routes, designated truck routes for construction would include Pershing Drive (Westchester Parkway to Imperial Highway); Florence Avenue (Aviation Boulevard to I-405); Manchester Boulevard (Aviation Boulevard to I-405); Aviation Boulevard (Manchester Avenue to Imperial Highway); Westchester Parkway/Arbor Vitae Street (Pershing Drive to I-405); Century Boulevard (Sepulveda Boulevard to I-405); ImperialHighway (Pershing Drive to I-405); La Cienega Boulevard (north of Imperial Highway); Airport Boulevard (Arbor Vitae Street to Century Boulevard); Sepulveda Boulevard (Westchester Parkway to Imperial Highway)…"].)*

The Draft Environmental Impact Report states, on page 4.14-44, "Construction on Areas 12B and Area 13 could require temporary sidewalk closures and lane closures on Manchester Avenue and Lincoln Boulevard, affecting pedestrians and transit operations." However, this was partially an oversight, as Area 12B is the existing (completed) golf course, which would not be modified as part of the Project, and therefore there would be no construction affecting Manchester Avenue. While temporary sidewalk closures and/or lane closures are possible on Lincoln Boulevard as a result of potential construction on

Area 13, there are currently no bicycle lanes on Lincoln Boulevard. While *2010 Bicycle Plan* proposes to add bicycle lanes to Lincoln Boulevard, these facilities are not designed, scheduled, or funded and therefore it is unknown how potential construction could affect potential bicycle lanes. In any case, construction and associated sidewalk or lane closures would be temporary, and with the provision of the various features of the construction traffic management plan, would be less than significant. As described on pages 4.14-44 and 4.14-45 of the Draft Environmental Impact Report, and as noted in the comment, as part of the construction traffic management plan, provisions would be made to incorporate safety precautions for pedestrians and bicyclists. This includes meeting all applicable requirements regarding notice and signage marking bicycle lane closures and may include provision of additional safety features or law enforcement personnel if required by applicable statutes*. Similarly, Section 4.14.2.1.1 states that the project would be required to comply with Caltrans Encroachment Permit requirements. As part of these requirements, Caltrans requires utilization of the Uniform Traffic Control Devices (MUTCD) [Traffic Control Plan Part 6.].1 Among these requirements, are provisions for "Detour for Bike Land on Roads with Closure of One Travel Direction." (Traffic Control Plan, page 1244.)* The additional restrictions suggested by the commenter are not warranted given the less than significant impact on bicycle lanes.

[1. Caltrans Traffic Control Plan Part 6 requirements are available online at: http://www.dot.ca.gov/hq/traffops/engineering/mutcd/pdf/camutcd2012/CAMUTCD2012_TTC.pdf]

3. Response to Comment LAXN-AL05-5 on page 2-48 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

LAXN-AL05-5
Comment:

Project Impacts
The Project is expected to generate nearly new 24,000 daily vehicle trips, with nearly all of those vehicles expected on streets designated for future bike lanes in the 2010 Bike Plan. (DEIR, pp. 4-14.48 & -49.) The City of Los Angeles has an abysmal record of installing bike lanes on major streets like Manchester, Lincoln and Sepulveda that are perceived by motorists as congested. Thus, adding tens of thousands of trips to streets near the Project will almost certainly have an adverse impact on the 2010 Bike Plan.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The following streets are identified in the City's *2010 Bicycle Plan* for bicycle lanes in the vicinity of the Project Site: Sepulveda Boulevard, La Tijera Boulevard, Lincoln Boulevard, Pershing Drive north of Westchester Parkway, Manchester Avenue west of Lincoln Boulevard, and Westchester Parkway east of Sepulveda Boulevard. It is important to note that the Project site does not conflict with any of these proposed bicycle facilities in the *2010 Bicycle Plan*, which is independent of the Project.

Based on a review of street widths, lane configuration, and on-street parking restrictions, each of those streets are likely to require the removal of on-street parking or a travel lane if bicycle lanes are to be accommodated (with the exception of Westchester Parkway east of Sepulveda Boulevard). As the comment notes, the removal of on-street parking or the removal of a travel lane (which significantly reduces vehicular capacity) require difficult implementation decisions, especially along commercially-developed arterials such as Lincoln Boulevard, La Tijera Boulevard, and Sepulveda Boulevard. These decisions must be faced with or without the addition of proposed Project traffic and the level of traffic added by the proposed Project is independent of that decision-making process.

These proposed bicycle *facilities* in the vicinity of the Project have not yet been designed, scheduled, or funded for implementation. While Project traffic will necessarily increase both daily and peak hour traffic on those corridors, there is no reason to expect that this moderate increase in traffic volumes compared to what is already on the roadway system will make the implementation of bicycle lanes in the vicinity any less likely than under "without Project" conditions. The comment provides no evidence to support its claim. *Furthermore, as noted in previous responses impacts under CEQA are based upon a comparison to existing conditions. (CEQA Guidelines Sections 15125(a) and 15126.2(a).)*

~~The City of Los Angeles has established no standards by which to measure the potential impact of additional vehicular traffic on vehicular travel lanes to existing or potential future bicycle facilities.~~ As described in Section 4.9.3.3.1 of the Draft EIR, LAWA will comply with bicycle policies and plans in the vicinity of LAX. The Project will not preclude the installation of bicycle facilities identified in the *2010 Bicycle Plan.* ~~Therefore, the~~ *The* Project would not result in a significant impact to existing or future bicycle facilities.

4. Response to Comment LAXN-AL05-6 on page 2-49 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

LAXN-AL05-6
Comment:

Because The Project Will Create More Than 24,000 Daily Vehicle Trips, It By Definition Has An Adverse Impact On Implementation Of The 2010 Bike Plan

For example, under the 2010 Bike Plan and its accompanying Five-Year Implementation Plan, the City promised to evaluate and install 40 miles of bikeway projects each year. The Bike Plan was adopted more than 3½ years ago. Of the 40 miles included in so-called Year One projects, only 7.1 miles have been installed, less than 18%. No proposed Year One bike lane project has been installed anywhere near the Westside. The City has just begun its analysis of "Year Two" projects, and Westside elected officials have already declared that they oppose bike lane projects on Westside streets such as Westwood Blvd (connecting directly to UCLA) and 6th Street (connecting to LACMA, the La Brea Tar Pits, and future subway stations at Wilshire/La Brea and Wilshire/Fairfax.

In short, any City project that adds traffic to streets proposed for bike lanes must be considered to have a significant adverse impact on bicyclists, because the Project makes it significantly less likely that the bike lanes will be installed. It bears noting that this is an impact, and a problem, that is entirely of the City's own making. If the City had any sort of positive record of installing bicycle infrastructure along key corridors, despite modest increases in traffic delay for motor vehicles, LAWA might be able to argue that the increases in traffic volumes and traffic congestion that this project will create would not have an impact on the 2010 Bike Plan. But because the City has used "traffic congestion" as a mantra for failing to install bike lanes on nearly every street where they are proposed, the City and LAWA cannot deny that increased traffic volumes will have a significant, adverse impact on bicyclists.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. The comment notes that, of the 40 miles of "Year One" projects in the *2010 Bicycle Plan*, only 7.1 miles have been installed, none on the Westside of Los Angeles. However, based on information from the LADOT Bike Blog (http://ladotbikeblog.wordpress.com/), many bicycle facilities have been installed since fiscal year (FY) 2011. In FY 2011, a total of 19.37 miles of bicycle lanes, 2.46 miles of

bicycle paths, and 8.13 miles of sharrows were installed (for a total of 29.96 miles of new bicycle facilities). In FY 2012, a total of 50.54 miles of bicycle lanes, 4.00 miles of bicycle paths, and 21.36 miles of sharrows were installed (for a total of 75.90 miles of new bicycle facilities). In FY 2013, a total of 101.00 miles of bicycle lanes, 1.5 miles of bicycle paths, 22.8 miles of sharrows, and 0.8 miles of bicycle friendly streets were installed (for a total of 126.1 miles of new bicycle facilities). In FY 2014, based on latest data available, a total of 19.1 miles of bicycle lanes were installed. In total, over those 3 ½ years, over 250 miles of new bicycle facilities were installed throughout the City of Los Angeles. Therefore, while the facilities installed were not necessarily those that were first identified for implementation, far more than 40 miles of bikeway projects have been installed each year. It appears that the City has nearly doubled its goal of 40 miles per year to approximately 71 miles of new bikeway facilities per year.

The comment also suggests that any project that adds traffic to a street on the 2010 Bicycle Master Plan would, by definition, have an adverse impact on bicyclists. *Impacts under CEQA are based upon a comparison to existing conditions. (CEQA Guidelines Sections 15125(a) and 15126.2(a).)* ~~However, under the California Environmental Quality Act (CEQA), by definition, a Project must provide feasible mitigation when it would result in a significant impact (not an "adverse impact") on a facility based on established impact criteria.~~ *As noted in Response to Comment LAXN-AL05-2, the Project's access driveways would conform to City of Los Angeles standards of design, including provision of adequate sight distance, crosswalks, and pedestrian movement controls to protect pedestrian safety. Further, the Project will comply with the City's bicycle parking ordinance and provide sufficient bicycle parking. Therefore, the Project would not increase pedestrian or bicycle hazards, and impacts to pedestrian and bicycle facilities would be less than significant.*
~~There are not, in fact, any established criteria for identifying a significant impact, as a result of a project's additional traffic on vehicular travel lanes, to existing or potential future bicycle facilities. Therefore, the Project cannot – by definition – have a significant impact on the *2010 Bicycle Plan*.~~

The proposed Project complies with the LAX Master Plan EIS/EIR Commitments, including LU-5: Compliance with the City of Los Angeles Transportation Element Bicycle Plan. This commitment requires LAWA to comply with bicycle policies and plans in the vicinity of LAX. The proposed Project also includes Project Design Features to support bicycling, including requiring bicycle facilities such as lockers and showers, and ~~bicyle~~ *bicycle* racks adjacent to walkways, near building entrances, intersections, transit stations, bus shelters, and any other pedestrian gathering areas at a maximum distance of 1,000 feet and in clusters of three, as noted in PDF LU-19 in the Draft EIR, Section 4.9.3.3.3. The proposed Project is consistent with the *2010 Bicycle Plan* as follows:

- Plan Purpose: "Increase, improve and enhance bicycling in the City as a safe, healthy, and enjoyable means of transportation and recreation." The proposed Project maintains the existing bicycle lane on Westchester Parkway while adding additional bicycle parking and providing space for recreational bikers on the
- Plan Goal: "Increase the number and type of bicyclists in the City." The proposed Project maintains the existing bicycle lane on Westchester Parkway and adds an additional 12-foot paseo that can be used by recreational bicyclists, thereby increasing the type of cyclists that can ride in the Project site vicinity.
- Plan Goal: "Make every street a safe place to ride a bicycle." The proposed Project maintains the existing bicycle lane on Westchester Parkway and adds an additional 12-foot paseo that can be used by recreational bicyclists, thereby maintaining existing and creating new safe places for cyclists to ride.
- Plan Goal: "Make the City of Los Angeles a bicycle friendly community." The proposed Project supports making the City of Los Angeles a bicycle friendly community by maintaining the bicycle lane on Westchester Parkway, adding a

paseo where additional recreational cyclists can ride, and requiring bicycle parking.

- Objective 1.2: "Provide convenient and secure bicycle parking and support facilities citywide."
- Objective 1.4: "Encourage and facilitate bicycle riding as an important mode of personal transportation as well as a pleasant source of outdoor exercise." The proposed Project encourages and facilitates bicycle riding as a mode of personal transportation and exercise by maintaining the bicycle lane on Westchester Parkway, adding a paseo where additional recreational cyclists can ride, and requiring bicycle parking. As noted in Table 4.6-2 of the Draft EIR, the proposed Project will comply with the City of Los Angeles Green Building Code Tier 1 requirements, including requiring bicycle parking and changing rooms, short-term bicycle parking within 200 feet of visitors' entrance for 5% of visitor motorized vehicle parking with a minimum of one two-bike capacity rack, and long-term bicycle parking for buildings over ten tenant occupants for 5% of motorized vehicle parking capacity, with a minimum of one space.
- Objective 2.2: "Assure a safe bicycling environment for riders of all experience levels." The proposed Project maintains the existing bicycle lane on Westchester Parkway and adds a paseo that could be used for less experienced riders, thereby providing a safe environment for all riders and experience levels.
- Objective 2.3: "Design and maintain all streets so that they incorporate Complete Street standards." The proposed project maintains the existing bicycle lane on Westchester Parkway, maintains the existing sidewalk, and adds a pedestrian paseo that could be used by recreational cyclists, thereby incorporating "Complete Street" standards.
- The Bicycle Plan designates Westchester Parkway as a bicycle lane. The proposed Project maintains this designation and does not preclude implementation of other planned bicycle lanes.

While Project traffic will necessarily increase both daily and peak hour traffic on those corridors, there are already many vehicles on those streets prior to Project traffic. There is no reason to expect that this moderate increase in traffic volumes compared to what is already on the roadway system will make the implementation of bicycle lanes in the vicinity any less likely than under "without Project" conditions. However, this comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

5. Response to Comment LAXN-AL05-7 on page 2-51 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

LAXN-AL05-7
Comment:

The Project Will Have Significant Traffic Impacts On Streets With Existing Or Proposed Bikeways

The DEIR analyzes traffic impacts under the "LOS" standard that focuses solely on automobile traffic, and ignores bicyclists and pedestrians. Under this auto-centric standard, the Project will cause "significant traffic delay impacts at several intersections" (DEIR p. 4.14-80), including:

1. Lincoln Blvd and Venice Blvd (2010 Bike Plan includes bike lanes on Lincoln; existing bike lanes on Venice Blvd)
2. Lincoln Blvd and Mindanao (Lincoln is proposed bike route in Los Angeles

County Bike Plan)
3. Lincoln Blvd and Fiji (Lincoln and Fiji are proposed bike routes in Los Angeles County Bike Plan)
4. Lincoln Blvd and Jefferson Blvd. (2010 Bike Plan includes bike lanes on Lincoln; bike lanes on Jefferson are currently in development per LADOT)
5. Lincoln Blvd and Manchester Ave (2010 Bike Plan includes bike lanes on both streets)
6. Sepulveda Blvd and Manchester Ave (2010 Bike Plan includes bike lanes on both streets)
7. Sepulveda and La Tijera (2010 Bike Plan includes bike lanes on both streets)
8. Sepulveda and Westchester Parkway (2010 Bike Plan includes bike lanes on both streets)
9. Sepulveda and i-105 westbound ramps (2010 Bike Plan includes bike lanes on Sepulveda)
10. Sepulveda and Imperial Highway (existing lanes on Imperial; 2010 Bike Plan includes bike lanes on Sepulveda)
11. Airport and Manchester (2010 Bike Plan includes bike lanes on Manchester)
12. Aviation/Florence and Manchester (just outside City of LA, in City of Inglewood, which has no bike plan, but LA 2010 Bike Plan has bike lanes on Manchester).
13. La Cienega and Florence (in City of Inglewood, which has no bike plan)
14. La Cienega and Manchester (in City of Inglewood, which has no bike plan)
15. Aviation and Arbor Vitae (2010 Bike Plan includes bike lanes on both streets)
16. La Cienega and Arbor Vitae (2010 Bike Plan includes bike lanes on Arbor Vitae)
17. La Cienega and Slauson (unincorporated Los Angeles County)

In short, at every intersection in the City of Los Angeles where the DEIR projects significant traffic impacts, at least one intersecting street (and often both) is designated for bike lanes in the 2010 Bike Plan. It is beyond question that projected traffic impacts make it significantly more difficult to obtain political approval to install bike lanes on these streets. That is a significant, adverse impact on bicyclists that is not mentioned, much less analyzed or discussed, in the DEIR.

The DEIR's proposed mitigation measures for motor vehicle traffic impacts would, in turn, have a significant adverse impact on bicyclists, both in their existing configuration and as proposed in the 2010 Bike Plan.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration.

As noted in Response to Comment LAXN-AL05-2, the Project's access driveways would conform to City of Los Angeles standards of design, including provision of adequate sight distance, crosswalks, and pedestrian movement controls to protect pedestrian safety. Further, the Project will comply with the City's bicycle parking ordinance and provide sufficient bicycle parking. Therefore, the Project would not increase pedestrian or bicycle hazards, and impacts to pedestrian and bicycle facilities would be less than significant.
~~While Project traffic will necessarily increase both daily and peak hour traffic within the Study Area, there are already many vehicles on those streets prior to Project traffic. There is no reason to expect that the Project's moderate increase in traffic volumes compared to what is already on the roadway system will make the implementation of bicycle lanes in the City or County any less likely than under "without Project" conditions~~.

Refer also to Response to Comments LAXN-AL05-3 and LAXN-AL05-5.

6. Response to Comment LAXN-AL05-8 on page 2-52 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

LAXN-AL05-8
Comment:

By Increasing Traffic, The Project Will Make Streets Less Safe For Bicyclists, In Violation of the 2010 Bike Plan's Goal to Make Every Street a Safe Place to Ride a Bicycle

The State of California and the City of Los Angeles have statutes, ordinances and policies declaring that bicyclists may ride on every street, including streets in the vicinity of the Project. Streets and Highways Code sec. 885.2 finds and declares that "the design and maintenance of many of our bridges and highways present physical obstacles to use by bicycles" and "the bicycle is a legitimate transportation mode on public roads and highways." California Vehicle Code section 21200 provides that "a person riding a bicycle . . . upon a highway has all the rights and is subject to all the provisions applicable to the driver of a vehicle, except those provisions which by their very nature can have no application." These state laws are embodied in the 2010 Bike Plan, which establishes the following goal: "Make every street a safe place to ride a bicycle." Thus, the issue for the DEIR to consider is not only whether the project has an impact on formally-designated bike infrastructure, but also whether any aspect of the Project, including proposed motor vehicle traffic mitigation measures, makes any area street a less safe place for bicyclists. If it does, the Project decreases the performance of the street for bicyclists.

Most Los Angeles streets do not have lanes that are wide enough to be safely shared by motorist and bicyclists. Bicyclist, thus, must "take the lane" and ride in mixed-flow traffic. When traffic volumes are low to moderate, motor vehicles can easily move into an adjacent lane to pass a bicyclist. There are often lengthy gaps between bunches of cars where no conflicts exist. As traffic volumes increase, the potential for cars to be "stuck" behind a bicyclist increases. That means increased aggressive and hostile driving near bicyclists, which makes the streets less safe for bicyclists and reduces the performance of the street for us.

On those streets with relatively wide curb lanes, bicyclists can (and usually do) attempt to share the travel lane with motorists, even if that requires bicyclists to ride in the "door zone" and/or weave in and out of parking lanes. Thus, any proposed modification to a street that makes it less "shareable" between bicyclists and motorists has an adverse impact on bicyclists.

The DEIR simply conducts the standard LOS analysis, but makes no effort to either quantitatively or qualitatively evaluate the impact on bicyclists of increased vehicle trips. In short, even if the LOS analysis shows no significant impact on motor vehicles, that does not mean that the Project will not have a significant impact on bicyclists, because the levels of congestion that make a street less comfortable and less safe for a bicyclist are lower. Moreover, the undisputed evidence regarding the City's failure to install on-street bikeways—not only since adoption of the 2010 Bike Plan but in the 37 years since adoption of the City's first bike plan in 1977—demonstrates that any increase in traffic volumes is highly likely to impact the City's willingness to install on-street bike infrastructure.

Response:

~~The City has no adopted standards for measuring a reduction in bicyclist safety due to increased traffic volumes in vehicular travel lanes, nor any impact thresholds by which to identify significant impacts.~~ The safety of a bicyclist is more directly linked to the quality of the design of the bicycle lane itself rather than the number of vehicles per lane on the adjacent travel lanes. ~~Therefore,~~ *For all the reasons described in the previous responses and the Draft EIR,* the Project would not result in significant impacts to the *2010 Bicycle*

Plan. On the contrary, the Project is adding bicycle and pedestrian facilities along its Westchester Parkway frontage and is adding bicycle parking and bicycle facilities on site, which would enhance safety.

Bicycle facilities along arterial and collector streets are installed at the discretion of the City Council and LADOT as per the elements of the *2010 Bicycle Plan*. The bicycle facilities called for in the *2010 Bicycle Plan* were not dictated by the levels of traffic on the roadway.

Refer also to Response to Comments LAXN-AL05-3 and LAXN-AL05-5.

7. Response to Comment LAXN-AL05-9 on page 2-53 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

LAXN-AL05-9
Comment:

Many Proposed Traffic Mitigation Measures Will Adversely Impact Bicyclists

Many of the traffic mitigation measures included in the DEIR will have an adverse impact on bicyclists.

1. At Sepulveda and Manchester, the proposed right turn lane would impact current bicyclists' ability to ride in the shoulder. Because it is unlawful for a bicyclist to ride straight through a marked right-turn lane, the proposed right turn lane would force bicyclists to "take" the full right lane while riding westbound. This will subject bicyclists to harassment. Looking to the future, any reconfiguration of roadway width to benefit motorists makes it exceedingly unlikely that the City will later configure the roadway to include bike lanes as called for in the 2010 Bike Plan.
2. At Sepulveda and La Tijera, adding a second left turn lane (and shifting all other westbound lanes northward to the curb) is entirely inconsistent with LADOT's current workplan that includes designing bike lanes for this stretch of La Tijera. Even if this bike lane project does not go forward, the "mitigation" removes a shoulder that can be used by bicyclists and curb parking that provides a buffer from traffic for sidewalk users.
3. At Sepulveda and Imperial Highway, there are existing bike lanes on Imperial Highway, and bicyclists proceeding west on Imperial Highway must ride across the right turn lane to proceed west. Creating a double-right turn lane makes conditions much less safe and much more difficult for bicyclists. From a review of Google Maps, it appears that this double right-turn lane already has been installed. Nevertheless, increasing the volume of right-turning vehicles, as the Project will do, will make this already-dangerous location even worse for bicyclists. The DEIR acknowledges that the bike lane must be shifted, but fails to acknowledge that this change exposes bicyclists to increased risks (p. 4.14-103).
4. At Airport Blvd and Manchester, the DEIR proposes significant reconfiguration of the lane alignments, without discussing how those changes might impact installation of bike lanes on Manchester. It seems likely that installing double-left turn lanes on the eastbound and westbound approaches will make it significantly more difficult to extend bike lanes through the intersection.

Simply, the DEIR is focused solely on ensuring that the Project does not make things worse for motorists, and ignores the fact that many of the proposed mitigations will make conditions worse for bicyclists.

These significant impacts on bicyclists can be mitigated. To mitigate the impact that

increased traffic will have on implementation of bike lanes as called for in the 2010 Bike Plan, LAWA and the City must:

1. Make a binding commitment to installing bike lanes on all streets called for in the 2010 Bike Plan in the vicinity of the Project; fund and conduct all necessary environmental review for those lanes; and install the bike lanes.
2. Make a binding commitment to implement "Bicycle Friendly Street" projects on all streets designated as such in the 2010 Bike Plan, including Loyola Blvd., Emerson Ave., 83rd Street, Wiley Post Ave. and Will Rogers Street. The streets must have significant traffic calming features to ensure that they are comfortable for bicyclists of all ages and abilities. It is worth noting that these measures, called for in the Bike Plan, will address nearby residents' concerns about increased "cut through" traffic on their streets, because Bicycle Friendly Streets are specifically designed and intended to substantial reduce, if not eliminate, cut-through traffic.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. *Bicycle safety is based on a number of factors, including lane design. As noted in Response to Comment LAXN-AL05-2, the Project's access driveways would conform to City of Los Angeles standards of design, including provision of adequate sight distance, crosswalks, and pedestrian movement controls to protect pedestrian safety. Further, the Project will comply with the City's bicycle parking ordinance and provide sufficient bicycle parking. Therefore, the Project would not increase pedestrian or bicycle hazards, and impacts to pedestrian and bicycle facilities would be less than significant.*

~~As described in Response to Comment LAXN-AL05-8 and others, the City has no adopted significance thresholds relating to impacts to bicyclists or potential future bicycle facilities, and therefore the Project would not have a significant impact on bicycle facilities.~~

The commenter also notes that bicyclists may ride in unauthorized non-bike lanes under future conditions, which is beyond the scope of the impact review. ~~The Project cannot be required to "mitigate" impacts that exist without the Project or implement improvements for which there is no nexus to Project traffic. LAWA also cannot make a binding commitment on behalf of the City.~~

8. Response to Comment LAXN-AL05-12 on page 2-56 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

LAXN-AL05-12
Comment:

<u>Because the City Has Not Provided On-Street Bike Infrastructure, All Sidewalks Must Be Designed to Accommodate Bicyclists</u>

According to the LA County Bike Coalition's 2013 Los Angeles Bicyclist and Pedestrian Count (http://labike.org/sites/default/files/Websitefiles/LACBC%202013%20LA%20Bike%20Count%20Report.pdf), on streets without bike lanes approximately 50% of all bicyclists ride on the sidewalk. In the City of Los Angeles, bicycling on sidewalks is legal. Unless and until the City installs safe, high-quality on-street bike infrastructure, the City must ensure that sidewalks are designed to accommodate bicyclists. That means ensuring that sidewalks are wide enough to accommodate bicyclists and pedestrians together, and that curb cuts and "beg buttons" are positioned to accommodate bicyclists. The DEIR's proposed mitigation measures for motor vehicles includes reducing sidewalk widths at certain intersections, including Aviation and Arbor Vitae (DEIR, p. 4.14-103). If any aspect

of the project affects the functionality of the sidewalks for bicyclists, that creates a significant impact that must be mitigated.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As discussed above, the proposed Project does not have a significant impact on bicycle infrastructure and provides additional pedestrian and bicycle infrastructure in the form of the paseo, maintenance of the existing bicycle path along Westchester Parkway, and requirements for additional bicycle racks. The commenter's request for the proposed Project to design sidewalks to accommodate bicyclists exceeds the scope and impact of the proposed Project and is not warranted. *At the intersection of Aviation Boulevard and Arbor Vitae Street, the proposed improvement (installing an exclusive eastbound right-turn lane) could be accommodated by widening the roadway by approximately 5 feet. The existing sidewalk is approximately 13 feet wide, including 5 feet adjacent to the curb where trees are planted at intervals. With the widening, the usable 8 feet of sidewalk width beyond the tree wells would be maintained. Further, there is limited pedestrian activity on this corner and no transit stops, and therefore an 8-foot sidewalk would not adversely affect pedestrian activity.*

9. Response to Comment LAXN-AL06-11 on page 2-62 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

LAXN-AL06-11
Comment:

(10) Should the neighborhood north of the project to Manchester, between Sepulveda Westway and McConnell choose to seek permit parking due to parking issues created by the project, the study necessary to obtain the parking permits would be paid for by LAWA.

Response:

This comment is noted for the record and will be forwarded to the decision-makers for review and consideration. As noted in Section 2.6.2 Community Compatibility, Urban Design Guidelines, and Sustainability of the Draft EIR, the proposed Project objectives include minimizing parking and traffic impacts on neighboring residential communities. The proposed Project meets this objective. The proposed Project includes Project Design Feature (PDF) Land Use (LU)-22, which requires parking spaces to conform to the standards set forth in the provisions of Los Angeles Municipal Code Section 12.21.A.4. Additionally, as noted in Section 4.14.3.1.7 Parking of the Draft EIR, the proposed Project's potential parking impacts were assessed by estimating the amount of parking required by LAMC for the proposed uses. During construction, an adequate number of parking spaces for construction workers would be available at all times on the Project site, and therefore no parking within neighborhoods is anticipated (Section 4.14.2.4.1 Construction of the Draft EIR). During operation, because the amount of parking for the commercial land uses will meet or exceed the LAMC requirements, and the recreational land uses will be using the ample parking of the office and research and development uses, the proposed Project will not have any significant parking impacts (Section 4.14.3.4.7 Parking of the Draft EIR). Because the proposed Project does not have significant impacts on parking, LAWA is not required to provide mitigation, including payment for a parking permit study.

Although the proposed Project does not have significant impacts on parking, LAWA will make the following additional *voluntary* project commitment as a Project Design Feature:

- **PDF T-15:** Once 50% of Area 11 and Area 12 are occupied on a square foot basis, LAWA will conduct a *supplemental* parking study to evaluate potential ~~parking impacts of~~ *off-site parking related to* the proposed Project. ~~Should significant parking~~

~~impacts be found at that time, LAWA will mitigate them to a level less than significant~~.

Please see Chapter 3.0 of the Final EIR for Corrections and Additions to the Draft EIR.

10. Response to Comment LAXN-AL07-9 on page 2-77 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

LAXN-AL07-9
Comment:

III. THE DEIR ANALYSIS OF THE PROJECT'S IMPACTS ON TRANSIT IS SIMILARLY INCOMPLETE.

A. The DEIR Ignores Culver City Transit.

The DEIR's transit analysis, like its surface traffic analysis, pays little or no attention to the Project's impacts on Culver City. For example, Table 4.14-1 states that no information was available concerning the Culver CityBus ("CCB"), even though the DEIR also states that CCB is one of the lines that takes travelers directly to "The Aviation/LAX Green Line Station" and "LAX City Bus Center," § 4.14, p. 4.14-10. Clearly, CCB transit information should, on that basis alone, be included in the DEIR. Further, CCB's transit service runs on Sepulveda Boulevard, Aviation Boulevard, La Cienega Boulevard, Washington Boulevard, Culver Boulevard, Jefferson Boulevard, and Century Boulevard, all of which are identified as part of the primary local access to the Project site. As a result, the DEIR should be enhanced with respect to impacts on CCB lines, both on the demand on service capacity due to trips generated by the Project and potential travel time increases due to surface traffic generated by the Project.

Response:

The Project's Draft EIR Sections 4.14.2.2.1 and 4.14.3.4.5 and the traffic study (Appendix E) compiled a list of transit routes within the Study Area, including Culver City Bus Routes 1 through 7 and Culver City Bus Rapid Route 6. Each of those routes are listed, along with their hours of operation and peak period headways, in Appendix E Table 6 provided on pages 46 and 47 of the traffic study. Appendix E Table 7, on page 48, provides additional detail about those transit lines that could reasonably be expected to serve the Project for the purposes of conducting a transit capacity analysis. The only Culver City Bus routes that get near the Project Site are Route 6 and Rapid Route 6, both of which travel on Sepulveda Boulevard immediately east of the Project Site. Other Culver City Bus routes do travel on streets that Project traffic would be expected to use, but do not provide service near to the Project Site. It would be inappropriate to include such routes as part of the transit system capacity serving the Project Site, and thus they were excluded from Table 7 and the transit capacity analysis.

The comment further states that no data for the Culver City Bus routes (Route 6 and Rapid Route 6) was included in Draft EIR Table 4.14-1. However, the reason no data was shown for those routes in the analysis is because Culver City staff could not provide data that detailed peak hour ridership numbers, as noted on Draft EIR page 4.14-10 (footnote 1). The only data offered from the City when queried was daily total boardings along the entire route, which tells nothing of how full the bus route is during the peak periods, let alone how full the bus is in the vicinity of the Project Site. As a result, the transit capacity analysis was conducted with the highly conservative assumption that the Culver City Bus had *no* residual capacity.

~~Furthermore~~ *Additionally*, in a meeting with Culver City staff on July 22, 2014, it was indicated by Culver City staff that the prevailing direction of heavy transit demand for Culver City Bus Route 6 and Rapid Route 6 is in the northbound direction during the

morning peak hour and in the southbound direction during the afternoon peak hour. Based on current published schedules for those buses, they run with similar frequency in the northbound and southbound directions during each peak hour. That implies that there is, at the least, residual capacity in the opposite directions of the peak demand, that is to say there is residual capacity in the southbound direction during the morning peak hour and in the northbound direction during the afternoon peak hour. The Project, as a primarily commercial development with no residential component, is heavily skewed toward generating inbound trips during the morning peak hour (that is, southbound for traffic or persons traveling on Sepulveda Boulevard) and toward generating outbound trips during the afternoon peak hour (that is, northbound for traffic or persons traveling on Sepulveda Boulevard). Therefore, the Project would primarily add trips to the Culver City Bus Route 6 or Rapid Route 6 in the direction that has residual capacity, and in that way could help to better balance the directional usage of the Culver City Bus along that route. At the least, the Project would not be burdening the Culver City Bus system and would not result in a significant impact. Refer to Response to Comment LAXN-AL07-10 for a detailed analysis of the number of transit trips that could potentially be added to Culver City Bus during the peak hours.

Furthermore, in order to analyze actual ridership on Route 6 and Rapid Route 6, per the request in the comment, transit ridership surveys were conducted in February 2015. Surveyors rode Route 6 and Rapid Route 6 for their full lengths in both the northbound and southbound directions during the morning peak period and the afternoon peak period on two days (16 total trips). While riding, they recorded the number of riders boarding and alighting the bus at each stop, along with a running tally of the total number of riders on the bus and how many were standing (while the presence of standing riders is not in itself an indication that all seats are full, the number of standing riders was recorded to provide additional information). The results of the transit survey are shown in Table LAXN-AL07-9. The data corroborates the claim made by Culver City staff that peak ridership occurs in the northbound direction during the morning peak hour and in the southbound direction during the afternoon peak hour. As noted above, this is opposite the primary direction of travel for Project traffic, and therefore the Project would only add minimal transit ridership to the peak directions. Refer to Response to Comment LAXN-AL07-10 for a detailed analysis of the number of transit trips that could potentially be added to Culver City Bus during peak hours. Further, as Table LAXN-AL01-9 shows, the maximum observed ridership in each of the trips was well below the maximum potential capacity of 80 riders[1] (including those seated and standing). In fact, in all but three of the trips surveyed, there was a seat available for every rider when the maximum load occurred. Of the three trips surveyed where the maximum load exceeded 40 riders, one had 42 riders and one had 47. One other trip, on Rapid Route 6 in the southbound direction during the second afternoon peak hour survey, experienced a maximum load of 62 riders, which was an outlier compared to the remaining 15 surveys. Still, even during that trip, the bus may have fit an additional 18 riders at full capacity. Further, in all but two trips, the maximum load was observed well north of the Project Site, within Culver City itself. Only on Route 6 in the northbound direction during the morning peak hour did the maximum load occur near to the Project Site (at Manchester Avenue and 76th Street, respectively), and in both cases the maximum load was well under seated capacity. Table LAXN-AL07-9 also summarizes the load experienced at the Manchester Avenue stop for each trip (near to the Project Site), and in general these loads were significantly lower than the maximum loads. This indicates that there is even more residual capacity near the Project Site, and only those riders that ride the line far into Culver City (or

[1] According to Transportation Planning Handbook, 3rd Edition (Institute of Transportation Engineers, 2009), a standard 40-foot bus like that used by Culver City Bus has capacity between 80 and 100 riders, depending on seating configuration (pages 694-695). For the purposes of this analysis, it is assumed that maximum capacity on these buses is 80 riders, including those seated and standing. Per observations during the transit survey, each bus provides 40 seats.

originate far into Culver City) will have any effect on the maximum load for a trip. Please see Appendix B of this Final EIR for additional traffic analysis tables.

The comment states that analysis must be conducted to assess the Project's impact on travel times in the region, specifically to determine how Culver City Bus routes will be affected. The traffic study was conducted using LADOT's guidelines and methodologies, which do not require travel time analysis. Furthermore, the level of service analysis adequately addresses intersection impacts to all vehicular users, including transit. Transit buses are counted just like every other vehicle during collection of traffic count data upon which the level of service analysis is based, and therefore these buses are inherent in the analysis.

11. Response to Comment LAXN-AL07-10 on page 2-79 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

LAXN-AL07-10
Comment:

B. DEIR Transit Analysis Overly Generalizes Capacity Impacts.
First, with respect to analysis of the impacts of the Project on transit capacity, the DEIR traffic study generalizes the transit capacity impacts of the Project using the overall transit residual capacity over all transit lines in the study area. However, not all bus lines are impacted equally by the trips generated by the Project. Sepulveda Boulevard (Culver CityBus Local and Rapid 6 service) is a major access to/from the airport (and the Project) and a detailed analysis should be provided on the impacts to the transit capacity along the Line 6 corridors.

Moreover, the results in Table 7, reflecting existing transit service patronage and residual capacity, are calculated on an average value of the load factor across all bus lines to estimate the residual capacity per run. However, the ridership patterns on the bus lines usually depend on commute patterns; therefore, the transit capacity impact analysis should look at the impacts to transit capacity per direction. CCB's Local 6 and Rapid 6 currently experience overcrowding in both northbound and southbound directions during peak hours, and the impacts of the Project will most likely require CCB to add more service to respond to increased demand.

Response:

The Project's transit capacity analysis was conducted to satisfy the requirements of the Los Angeles County Congestion Management Program (CMP), and followed the guidelines therein.

Table LAXN-AL07-4 summarizes a calculation of the number of Project person-trips that are expected to use either Culver City Bus Route 6 or Rapid Route 6 on a daily and peak hour basis. Please see Appendix B of this Final EIR for additional traffic analysis tables. Those two bus routes travel between the Green Line and Culver City via Sepulveda Boulevard. As described in Response to Comment LAXN-AL07-6 above, a total of 4.5% of Project traffic is expected to enter Culver City via Sepulveda Boulevard, and therefore would potentially use Culver City Bus Route 6 or Rapid Route 6 as an alternative to an automobile. As requested by comment LAXN-AL07-11, average vehicle occupancy (AVO) of 1.40 was used to convert vehicle trips into person trips. As described in detail in Response to Comment LAXN-AL07-12, 7.5% of all Project trips were assumed to use public transit as part of the transit capacity analysis contained in the traffic study (The CMP guidelines suggest a factor of 7% of all Project trips for a primarily commercial project within ¼ mile of a CMP transit corridor, such as Lincoln Boulevard or Sepulveda Boulevard. Further, this assumption exceeds the Project's 5% transit credit applied to the

trip generation estimates for office, research and development, and community/civic uses, and is therefore a more conservative assumption (i.e., results in higher transit trip estimates) for the purposes of conducting the transit impact analysis). By applying these various factors to the Project's trip generation estimates from Table 4.14-8 on pages 4.14-47 and 4.14-48 of the Draft Environmental Impact Report, the number of person-trips the Project can be expected to add to those two Culver City Bus lines can be estimated. As shown in Table LAXN-AL07-4, the Project would add approximately 9 morning peak hour transit riders (7 southbound, 2 northbound) and 12 afternoon peak hour transit riders (4 southbound, 8 northbound) to those two lines combined. Please see Appendix B of this Final EIR for additional traffic analysis tables. Based on current information from the Culver City Bus website, both Culver City Bus Route 6 and Rapid Route 6 run every 15 to 20 minutes in each direction during the morning and afternoon peak hours, meaning there are a total of 12 to 16 buses, each with a capacity of at least 40 riders, traveling on Sepulveda Boulevard during both the morning and afternoon peak hours. At most, the Project could add one rider to each of those buses. Additionally, as described in Response to Comment LAXN-AL07-9, Culver City staff indicated that the predominant direction of travel for transit riders on Route 6 and Rapid Route 6 is northbound during the morning peak period and southbound during the afternoon peak period, which is opposite the direction of Project traffic. In the peak direction, the Project would add 2 transit riders during the morning peak hour and 4 transit riders during the afternoon peak hour – well under one rider per bus.

As described in detail in Response to Comment LAXN-AL07-9, a transit survey was conducted by the Applicant on Culver City Bus Route 6 and Rapid Route 6 in February, 2015. The results of that survey indicated that both bus routes have residual transit capacity in both directions during the peak hours. Out of 16 surveys conducted, all but one had residual capacity of at least 33 riders even when the maximum load anywhere along the route was reached. The remaining trip still had residual capacity of 18 riders at its peak. In all cases, the peak loads experienced during the surveys were in the opposite direction of travel of peak Project traffic. Therefore, the minimal number of transit riders the Project may add to Culver City Bus (as calculated above) would be easily absorbed within existing capacity on the bus lines. No expansion of the Culver City Bus system would be required, and therefore this small incremental increase in transit riders due to Project traffic will not cause Culver City Bus to incur any additional cost. Instead, the additional passengers generated by the Project will add revenue in the form of fares.

On September 25, 2014, Culver City staff provided a 2010 report on the performance of Culver City Bus Route 6 and Rapid Route 6 (CCB Route 6 Report). The CCB Route 6 Report contained information about revenue, ridership, and travel times for Route 6 and Rapid Route 6. However, the data was not specific enough to estimate the residual capacity of the two bus routes during the morning and afternoon peak hours. The CCB Route 6 Report indicated the following key figures relating to Route 6:

- As indicated by Culver City staff, the CCB Route 6 Report confirmed that Route 6 has heavier ridership in the northbound direction during the morning peak hour and in the southbound direction in the afternoon peak hour (opposite the directions of peak hour Project traffic).
- The maximum load (i.e., peak ridership on a single bus during the peak hour) in the northbound direction at Sepulveda Boulevard & Westchester Parkway was 34 riders; the maximum northbound load anywhere along the route was 66 riders at Sepulveda Boulevard & Richland Avenue, approximately 6.0 miles north of the Project Site. The average maximum load is 31 riders.
- The maximum load in the southbound direction at Sepulveda Boulevard & Westchester Parkway was 47 riders; the maximum southbound load anywhere along the route was 60 riders at Sepulveda Boulevard & Pico Boulevard, approximately 6.3

miles north of the Project Site. The average maximum load is 29 riders.
- The CCB Route 6 Report indicates that many riders travel short distances, using the bus for local circulation.

Similarly, the CCB Route 6 Report indicated key figures relating to Rapid Route 6:

- Rapid Route 6 has heavier ridership in the northbound direction during the morning peak hour and in the southbound direction in the afternoon peak hour.
- The maximum load in the northbound direction at Sepulveda Boulevard & Manchester Avenue was 63 riders; the maximum northbound load anywhere along the route was 66 riders at Sepulveda Boulevard & Palms Boulevard, approximately 5.0 miles north of the Project Site.
- The maximum load in the southbound direction at Sepulveda Boulevard & Manchester Avenue was 30 riders; the maximum southbound load anywhere along the route was 54 riders at Sepulveda Boulevard & Pico Boulevard, approximately 6.3 miles north of the Project Site.

What the CCB Route 6 Report does not say is how the maximum load on each route compares to the loads for neighboring bus trips – that is, how much lower the maximum loads are on the trips before and after the peak trip. As a result, it is impossible to accurately gauge residual transit capacity during the peak hours. However, as calculated above, the Project would add less than one rider per bus trip in the peak direction during the peak hours, which would not cause Culver City Bus to purchase and operate additional buses on those routes. If the routes are experiencing overcrowding in both directions during peak periods today, well before the Project begins construction, as claimed in the comment and supported by the data provided, then the need to add additional service cannot be attributed to the Project.

The comment also suggests that the method used to calculate the load factors to determine transit system capacity were flawed, suggesting that the true load was understated. In fact, the calculation of the load factors was extremely conservative. Table 7 of the traffic study shows the load factors calculated for each route for which detailed ridership data was available (which did not include Culver City Bus routes). For a given transit line, each run of that route during the peak hour was reviewed to determine the highest load (that is, number of passengers) at any time at any point on that route. That is, even if 12 extra passengers got on a bus for a single stop, 12 miles from the Project site, the load for that one stop was attributed to the entire run for the entire length of the route. That peak load was ascertained for each run of each line throughout the peak period to determine the highest peak load during the morning and afternoon peak periods. Next, that highest peak load was averaged along with the peak loads of the two runs prior to and two runs after the highest peak. Thus, the resulting “average load” consists of the averages of the peak loads across five consecutive runs of a particular route. Of particular importance is the fact that the average load is in fact based on the peak direction, since the peak direction is the one with the highest peak loads. In this analysis, the minority direction of travel is assumed to have as high a ridership as the peak direction. For all of these reasons, the transit capacity analysis was extremely conservative, and likely understates the resulting residual capacity on the transit system in the vicinity of the Project Site.

12. Corrections and Additions Section 3.1 Introduction on page 3-1 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

3.1 Introduction

As provided in Section 15088(d) of the California Environmental Quality Act Guidelines, responses to comments may take the form of a revision to a Draft Environmental Impact Report (EIR) or may be a separate section in the Final EIR. This chapter complies with the latter of these two guidelines and provides changes as a result of clarifications to, and comments received on, the Draft EIR for the LAX Northside Plan Update (proposed Project). The following revisions are hereby made to the text of the Draft EIR. Changes in text are signified by ~~strikeouts~~ where text is removed and shown with underline where text is added, unless otherwise noted. *Where existing intervening text, subsections, or sections have been omitted from this chapter and are not specifically deleted, they shall not be considered amended or deleted and should therefore be considered retained in their current state (such language may be displayed as "…").* 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 proposed Project.

13. Corrections and Additions to Chapter 4.2 Air Quality on page 3-7 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise Section 4.2.3.1.1 Regional Air Quality Impacts in Section 4.2 Air Quality as follows:

4.2.3.1.1 Regional Air Quality Impacts

Operational Emissions

Mobile Sources

The mobile source emissions will result from the typical daily operation of motor vehicles by employees and visitors to and from the Project site. Traffic emissions were estimated using the trip rates specified in Appendix E and Project specific trip lengths. The analysis assumes CalEEMod™ default LADOT approved inputs for trip purpose and trip type. Project specific trip lengths were estimated for the community, civic, and retail uses based on the fact that these land uses would be local community serving areas. The emission estimates from mobile sources also reflect the implementation of a transportation demand management (TDM) program for the Project Site to promote trip reduction and non-auto travel. This measure is incorporated into the analyses by applying a 5% trip reduction to office and research and development land uses on the Project site (See Appendix E for details).

14. Corrections and Additions to Chapter 4.2 Air Quality on page 3-7 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise Section 4.2.3.3.2 Project Design Features in Section 4.2 Air Quality as follows:

4.2.3.3.2 Project Design Features

- ***PDF Air Quality (AQ)-1:*** *Implementation of a Transportation Demand Management (TDM) program for the Project Site to promote trip reduction and non-auto travel (See Appendix E*

for further details). This measure is incorporated into the analyses by applying a 5% trip reduction to office and research and development land uses on Project site.

15. Corrections and Additions to Chapter 4.2 Air Quality on page 3-9 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise Section 4.2.5 Mitigation Measures in Section 4.2 Air Quality as Follows:

4.2.5 Mitigation Measures

The proposed Project will be developed in compliance with all statutory requirements to preclude significant impacts on air quality to the extent feasible. In addition, implementation of LAX Master Plan Commitments LAX-AQ-1, LAX-AQ-2, LAX-AQ-3 and LAX-AQ-4 and the Project Design Features (Section 4.2.3.3.2) would ensure that impacts relative to ambient air quality, human health risk and most of the criteria pollutant regional mass emissions (except construction VOC emissions, operational VOC emissions and operational NO_X emissions) associated with the proposed Project would be less than significant. The proposed Project already incorporates all technically feasible air quality mitigations measures to reduce construction and operational related VOC and NO_X emissions which include use of Tier 4 engines in construction equipment, compliance with SCAQMD Rule 1113 to limits VOC emissions from architectural coatings and consumer products and the implementation of a TDM program to promote trip reduction and non-auto travel. Therefore, no additional Project-specific mitigation measures are included for the proposed Project.

16. Corrections and Additions to Chapter 4.6 Greenhouse Gas Emissions on page 3-9 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise Section 4.6.3.1.3 Operations in Section 4.6 Greenhouse Gas Emissions as follows:

4.6.3.1.3 Operations

Mobile Sources

The mobile source emissions will result from the typical daily operation of motor vehicles by employees and visitors to the Project site. Traffic emissions were estimated using the trip rates specified in Appendix E and Project specific trip lengths. The analysis assumes CalEEMod™ default LADOT approved inputs for trip purpose and trip type. Project specific trip lengths were estimated for the community, civic, and retail uses based on the fact that these land uses would be local community serving areas. The emission estimates from mobile sources also reflect the implementation of a transportation demand management (TDM) program for the Project Site to promote trip reduction and non-auto travel. This measure is incorporated into the analyses by applying a 5% trip reduction to office and research & development land uses on the Project site (See Appendix E for details).

17. Corrections and Additions to Chapter 4.6 Greenhouse Gas Emissions on page 3-9 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise Section 4.6.3.3.2 Project Design Features in Section 4.6 Greenhouse Gas Emissions as follows:

4.6.3.3.2 Project Design Features

- ***PDF Greenhouse Gas (GHG)-1:*** *Implementation of a Transportation Demand Management (TDM) program for the Project site to promote trip reduction and non-auto travel (See Appendix E for further details). This measure is incorporated into the analyses by applying a 5% trip reduction to office and research & development land uses on Project site.*

18. Corrections and Additions to Chapter 4.6 Greenhouse Gas Emissions on page 3-10 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise Section 4.6.3.4.5 Summary of Impacts in Section 4.6 Greenhouse Gas Emissions as follows:

4.6.3.4.5 Summary of Impacts

The proposed Project allows 2,320,000 square feet of a mixed use development consisting of recreational uses, office space, research and development uses, retail and airport support. The primary sources of GHG emissions of this development are employee/customer commutes, consumption of electricity, natural gas, and water, and the generation of solid waste and wastewater. The proposed Project includes several design features that reduce GHG emissions associated with construction and operation. Some of the design features that result in emission reductions compared with past practices include compliance with LAGBC Tier 1 requirements and implementation of a TDM program to promote trip reduction and non-auto travel. The GHG emissions (operational plus amortized construction and vegetation) associated with the proposed Project would not exceed the threshold of significance described in Section 4.6.3.2; therefore, implementation of the proposed Project would not result in significant GHG impacts.

19. Corrections and Additions to Chapter 4.14 Traffic on page 3-19 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise subsection Related Projects in Section 4.14.3.1.2 Local Street System in Section 4.14 Traffic as follows:

4.14.3.1.2 Local Street System

…[¶]…The LAX model captures all projected regional development in the Study Area between 2010 and 2025, including, but not limited to, the related projects discussed below.

20. Corrections and Additions to Chapter 4.14 Traffic on page 3-19 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise subsection 4.14.3.2.2 Local Street System related to Culver City in Section 4.14 as follows:

4.14.3.2.2 Local Street System

Culver City

Culver City has established a standard incremental significance threshold to determine if a project creates a significant traffic impact. A project impact on an intersection is deemed significant if the resulting increase of the V/C ratio meets or exceeds 0.050 while operating at

LOS C, 0.040 while operating at LOS D, or 0.020 while operating at LOS E or LOS F. Additionally, at the request of Culver City staff, an analysis of Culver City intersections was conducted using the more rigorous significant impact criteria of the City of Los Angeles, which is provided for informational purposes only and is not required by CEQA. This analysis is contained in Appendix C (Culver City Supplemental Analysis) to Appendix E (Traffic Study). This requested analysis is (1) provided for informational purposes only, (2) is not required by CEQA, (3) is inconsistent with LAWA's traffic methodology as described in Section 4.14.3.2.2, and (4) is not used as a threshold of significance for this EIR.

21. Corrections and Additions to Chapter 4.14 Traffic on page 3-19 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise Section 4.14.3.3.2 Project Design Features in Section 4.14 Traffic as follows:

4.14.3.3.2 Project Design Features

- **PDF T-15:** Once 50% of Area 11 and Area 12 are occupied on a square foot basis, LAWA will conduct a *supplemental* parking study to evaluate potential ~~parking impacts of~~ *off-site parking related to* the proposed Project. ~~Should significant parking impacts be found at that time, LAWA will mitigate them to a level less than significant.~~

22. Corrections and Additions to Chapter 4.14 Traffic on page 3-20 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise subsection Future 2022 with Project Conditions in section 4.14.3.4.2 Local Street System in Section 4.14 Traffic as follows:

4.14.3.4.2 Local Street System

Future 2022 with Project Conditions

In addition to the 18 significantly impacted study intersections identified above under Future with Project conditions, an analysis of the intersections within Culver City using *Culver City Staff's requested criteria* (City of Los Angeles impact criteria) identified one ~~location where Project traffic would exceed the threshold~~ *intersection which exceeded the criteria requested by Culver City Staff*. ~~at~~ Intersection #86, Sepulveda Boulevard & Jefferson Boulevard & Playa Street *traffic would exceed Culver City Staff's requested criteria during the afternoon peak hour*. This would not constitute a significant impact, but is provided as supplemental information. Further, an improvement to Intersection #86 is offered as a proposed Project condition of approval, described in Section 4.14.3.3.2, Project Design Features. The analysis of Culver City intersections using Los Angeles impact criteria is summarized in more detail in Appendix C of the Transportation Study in Appendix E.

23. Corrections and Additions to Chapter 4.14 Traffic on page 3-20 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise Section 4.14.3.4.5 Public Transit in Section 4.14 Traffic as follows:

4.14.3.4.5 Public Transit

An analysis of the existing and future transit system was conducted based on the residual capacity and projected transit usage growth through 2022, when full development of the

proposed Project is anticipated. As described above, the transit system in the Study Area is currently estimated to have a residual capacity of approximately ~~2,415~~2,347 transit patrons during the morning peak hour and ~~2,492~~2,416 transit patrons during the afternoon peak hour. The transit system is projected in 2022 to have residual capacity of ~~2,107~~2,051 transit patrons during the morning peak hour and ~~2,175~~2,111 transit patrons in the afternoon peak hour.

The proposed Project is estimated to add a total of 2,482 daily transit trips, including 211 morning peak hour trips and 267 afternoon peak hour trips, at full development. This estimate is less than the existing and projected future residual transit capacity, therefore the proposed Project will not result in a significant impact on the regional transit system.

24. Corrections and Additions to Chapter 4.14 Traffic on page 3-21 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise Section 4.14.4.1 Transportation Mitigation Program in Section 4.14 *Traffic (page 4.14-92 and 93)* as follows:

25. Corrections and Additions to Chapter 4.14 Traffic on page 3-21 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise Section 4.14.4.1 Transportation Mitigation Program in Section 4.14 Traffic *(top of page 4.14-103)* as follows:

26. Corrections and Additions to Chapter 4.14 Traffic on page 3-21 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Buses

In order to bolster transit capacity and LOS in the Study Area, the proposed Project proposes to mitigate *intersection* impacts along Manchester Boulevard *(Intersections 12, 28, 46, 47, and 49)* by providing two additional transit buses for Metro Route 115. Each bus provides a seated capacity of 40 people and a standing capacity of 50 people and will supplement the existing bus service along Manchester Boulevard during peak hours. **Figure 4.14-6**, Intersections along Enhanced Bus Routes shows the intersections along these routes where traffic volumes would be reduced as a result of the enhanced bus service available.

27. Corrections and Additions to Chapter 5.0 Other CEQA Considerations on page 3-37 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Chapter 5.0, Other CEQA Considerations

Revise subsection 5.3.1 Air Quality in Section 5.3 Unavoidable Significant Impacts in Section 5.0 Other CEQA Considerations as follows:

3.2.1 Air Quality

As analyzed in Section 4.2, construction related volatile organic compound (VOC) emissions would be significant. Operational related VOC emissions as well as oxides of nitrogen (NOx) emissions would also be significant. The proposed Project will be developed in compliance with all statutory requirements to preclude significant impacts on air quality to the extent feasible. In addition, implementation of LAX Master Plan Commitments LAX-AQ-1, LAX-AQ-2, LAX-AQ-3 and LAX-AQ-4 and the Project Design Features (Section 4.2.3.3.2) would ensure that impacts

relative to ambient air quality, human health risk and most of the criteria pollutant regional mass emissions (except construction VOC emissions and operational VOC and NOx emissions) associated with the proposed Project would be less than significant. The proposed Project already incorporates all technically feasible air quality mitigations measures to reduce construction and operational related VOC and NO_X emissions which include use of Tier 4 engines in construction equipment, compliance with SCAQMD Rule 1113 to limits VOC emissions from architectural coatings and consumer products and the implementation of a transportation demand management (TDM) program to promote trip reduction and non-auto travel. No further feasible mitigation measures are available and therefore no Project-specific mitigation measures are included for the proposed Project. This would be considered a significant and unavoidable impact.

28. Corrections and Additions to Appendix E Traffic Study on page 3-49 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise the Existing Conditions section of the Executive Summary of Appendix E Traffic Study as follows:

EXISTING CONDITIONS

An analysis of existing frequency and ridership was conducted on the transit lines within walking distance of the Project Site. It is estimated that the transit lines serving the Project Site have combined residual capacity of at least ~~1,113~~2,347 transit patrons during the morning peak hour and ~~2,492~~2,416 transit patrons during the afternoon peak hour.

Revise the Transportation Mitigation Program section of the Executive Summary of Appendix E Traffic Study (page ES-11) as follows:

…

Culver City

Culver City has established a standard incremental significance threshold to determine if a project creates a significant traffic impact. A project impact on an intersection is deemed significant if the resulting increase of the V/C ratio meets or exceeds 0.050 while operating at LOS C, 0.040 while operating at LOS D, or 0.020 while operating at LOS E or F.

Additionally, at the request of Culver City staff, an analysis of Culver City intersections was conducted using the more rigorous significant impact criteria of the City of Los Angeles. This analysis is presented in Appendix C. This requested analysis is (1) provided for informational purposes only, (2) is not required by CEQA, (3) is inconsistent with LAWA's traffic methodology, and (4) is not used as a threshold of significance for this EIR.

Revise the Transportation Mitigation Program section of the Executive Summary of Appendix E Traffic Study *(pages ES-13 through ES-16)* as follows:

TRANSPORTATION MITIGATION*/CONDITION OF APPROVAL* PROGRAM

The project would implement a transportation mitigation/condition of approval program consisting of the following four components.

…

~~Revise the Transportation Mitigation Program section of the Executive Summary of Appendix E Traffic Study as follows:~~

~~TRANSPORTATION MITIGATION PROGRAM~~

The Project proposes to mitigate impacts along Manchester Boulevard by providing additional transit buses on an existing transit line. Two buses would be provided to increase service capacity and frequency for Metro Route 115, which travels east and west on Manchester Boulevard. Each bus provides a standing capacity of 50 people and will supplement the existing bus service along the Lincoln and Manchester corridors during peak hours. A total credit of up to ~~66~~58 trips (~~33~~29 in each direction) was applied to the intersections along Metro Route 115. Additionally, the Applicant would work with Metro and LADOT during Project design to identify a suitable location on the Project Site which will be dedicated for potential future development of a transit station. No additional transit or trip credit was assumed for this design feature.

29. Corrections and Additions to Appendix E Traffic Study on page 3-51 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise the Significant Impact Criteria subsection of Chapter 1 of Appendix E Traffic Study as follows:

Culver City

Culver City has established a standard incremental significance threshold to determine if a project creates a significant traffic impact. A project impact on an intersection is deemed significant if the resulting increase of the V/C ratio meets or exceeds 0.050 while operating at LOS C, 0.040 while operating at LOS D, or 0.020 while operating at LOS E or F.

Additionally, at the request of Culver City staff, an analysis of Culver City intersections was conducted using the more rigorous significant impact criteria of the City of Los Angeles. This analysis is presented in Appendix C. This requested analysis is (1) provided for informational purposes only, (2) is not required by CEQA, (3) is inconsistent with LAWA's traffic methodology, and (4) is not used as a threshold of significance for this EIR.

30. Corrections and Additions to Appendix E Traffic Study on page 3-50 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise the Existing Transit Ridership subsection of Chapter 2 Existing Conditions of Appendix E Traffic Study as follows:

Existing Transit Ridership

Table 7 summarizes the average load for each line as well as the capacity of each run. It also shows the average residual transit capacity for each run and total residual capacity during the peak periods. As indicated in Table 7, all lines for which data was available have residual capacity during the morning and afternoon peak periods. In total, the transit system has residual capacity of at least ~~1,113~~2,347 riders during the morning peak period and ~~2,492~~2,416 riders during the afternoon peak period. Additional residual capacity is likely available on the bus lines from ~~Torrance Transit~~ Culver City Bus and Beach Cities Transit~~, but since data was not~~

~~available for these services they were assumed not to have additional capacity~~. *In order to analyze actual ridership on Culver City Route 6 and Rapid Route 6, transit ridership surveys were conducted in February 2015. Surveyors rode Route 6 and Rapid Route 6 for their full lengths in both the northbound and southbound directions during the morning peak period and the afternoon peak period on two days (16 total trips). While riding, they recorded the number of riders boarding and alighting the bus at each stop, along with a running tally of the total number of riders on the bus and how many were standing (while the presence of standing riders is not in itself an indication that all seats are full, the number of standing riders was recorded to provide additional information). The results of the transit survey are shown in Table LAXN-AL07-9. The data indicate that peak ridership occurs in the northbound direction during the morning peak hour and in the southbound direction during the afternoon peak hour. This is opposite the primary direction of travel for Project traffic, and therefore the Project would only add minimal transit ridership to the peak directions. Further, as Table LAXN-AL01-9 shows, the maximum observed ridership in each of the trips was well below the maximum potential capacity of 80 riders[2] (including those seated and standing). In fact, in all but three of the trips surveyed, there was a seat available for every rider when the maximum load occurred. Of the three trips surveyed where the maximum load exceeded 40 riders, one had 42 riders and one had 47. One other trip, on Rapid Route 6 in the southbound direction during the second afternoon peak hour survey, experienced a maximum load of 62 riders, which was an outlier compared to the remaining 15 surveys. Still, even during that trip, the bus may have fit an additional 18 riders at full capacity. Further, in all but two trips, the maximum load was observed well north of the Project Site, within Culver City itself. Only on Route 6 in the northbound direction during the morning peak hour did the maximum load occur near to the Project Site (at Manchester Avenue and 76th Street, respectively), and in both cases the maximum load was well under seated capacity. Table LAXN-AL07-9 also summarizes the load experienced at the Manchester Avenue stop for each trip (near to the Project Site), and in general these loads were significantly lower than the maximum loads. This indicates that there is even more residual capacity near the Project Site, and only those riders that ride the line far into Culver City (or originate far into Culver City) will have any effect on the maximum load for a trip. Please see Appendix B of this Final EIR for additional traffic analysis tables.*

31. Corrections and Additions to Appendix E Traffic Study on page 3-50 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise the Future without Project Conditions as Measured Against Future Without Project Conditions (Year 2022) section of Chapter 7 Intersection Impact Analysis of Appendix E Traffic Study as follows:

FUTURE WITH PROJECT CONDITIONS AS MEASURED AGAINST FUTURE WITHOUT PROJECT CONDITIONS (YEAR 2022)

[2] *According to Transportation Planning Handbook, 3rd Edition (Institute of Transportation Engineers, 2009), a standard 40-foot bus like that used by Culver City Bus has capacity between 80 and 100 riders, depending on seating configuration (pages 694-695). For the purposes of this analysis, it is assumed that maximum capacity on these buses is 80 riders, including those seated and standing. Per observations during the transit survey, each bus provides 40 seats.*

Additionally, a supplemental analysis of intersections within Culver City *using Culver City Staff's requested criteria (City of Los Angeles impact criteria)* was conducted. ~~at Culver City staff's request measuring Project traffic against an alternative set of thresholds based on City of Los Angeles impact criteria.~~ *This analysis identified one intersection which exceeded Culver City Staff's requested criteria during the afternoon peak hour,* ~~Project traffic would exceed these thresholds at~~ Intersection #86, Sepulveda Boulevard & Jefferson Boulevard & Playa Street. The analysis of Culver City intersections using Los Angeles impact criteria is summarized in more detail in Appendix C.

32. Corrections and Additions to Appendix E Traffic Study on page 3-51 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise the Provision of Additional Buses subsection of the Transit system Improvements section of Chapter 8 Transportation Mitigation Program of Appendix E Traffic Study *(page 160)* as follows:

33. Corrections and Additions to Appendix E Traffic Study on page 3-52 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise the Regional Transit System Impacts subsection of the Regional Transit System Impact Analysis section of Chapter 9 Congestion Management Program Analysis of Appendix E Traffic Study *(page 244)* as follows:

34. Corrections and Additions to Appendix C Culver City Supplemental Analysis of Appendix E Traffic Study on page 3-99 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise Appendix C Culver City Supplemental Analysis of Appendix E Traffic Study as follows:

Culver City Supplemental Analysis

Culver City staff requested that an additional analysis of study intersections within their jurisdiction be conducted using the significant impact criteria specified by the City of Los Angeles. As detailed in Chapter 1, adopted Culver City impact criteria identify a significant impact at an intersection if the project-related increase in V/C ratio meets or exceeds 0.050 while operating at LOS C, 0.040 while operating at LOS D, or 0.020 while operating at LOS E or F. The City of Los Angeles criteria identify a significant impact an intersection if the project related increase in V/C ratio meets or exceeds 0.040 while operating at LOS C, 0.020 while operating at LOS D, or 0.010 while operating at LOS E or F. The City of Los Angeles significant impact criteria is more stringent than that of Culver City. However, as noted in greater detail in FEIR Response to Comment LAXN-AL07-7, LAWA does not believe the request by Culver City Staff is appropriate as a CEQA threshold. This requested analysis is (1) provided for informational purposes only, (2) is not required by CEQA, (3) is inconsistent with LAWA's traffic methodology, and (4) is not used as a threshold of significance for this EIR.

The ~~significant impact~~ analysis of, the 10 intersections located within Culver City presented in Chapters 7 and 8 was conducted assessing impacts according to Culver City adopted impact

criteria. This Appendix presents the results of the analysis of the same locations according to the criteria requested by Culver City Staff (City of Los Angeles impact criteria). Note that this analysis used the same methodology (that is, Intersection Capacity Utilization [ICU]) and traffic volumes as used in Chapters 7 and 8.

Revise the Existing with Project Conditions (Year 2012) section of Appendix C Culver City Supplemental Analysis of Appendix E Traffic Study as follows:

EXISTING WITH PROJECT CONDITIONS (YEAR 2012)

The Existing with Project (year 2012) conditions from Table 10 in Chapter 5 were compared to the Existing (year 2012) conditions from Table 3 in Chapter 2. Table C-1 shows the results of the ~~significant~~ analysis for the ten intersections within Culver City using City of Los Angeles significant impact criteria. As Table C-1 shows, none of the 10 locations would exceed these criteria ~~be impacted~~.

35. Corrections and Additions to Appendix C Culver City Supplemental Analysis of Appendix E Traffic Study on page 3-99 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise the Future with Project Conditions (Year 2022) section of Appendix C Culver City Supplemental Analysis of Appendix E Traffic Study as follows:

FUTURE WITH PROJECT CONDITIONS (YEAR 2022)

The Future with Project (year 2022) conditions from Table 11 in Chapter 6 were compared to the Future without Project (year 2022) conditions from Table 8 in Chapter 3. Table C-2 shows the results of the ~~significant impact~~ analysis for the 10 intersections within Culver City using the criteria requested by Culver City Staff (City of Los Angeles significant impact criteria). As Table C-2 shows, the intersection of Sepulveda Boulevard & Jefferson Boulevard & Playa Street would exceed these criteria ~~be impacted~~ during the afternoon peak hour.

Table C-2 also shows the V/C ratio would still exceed the Culver City Staff's criteria ~~impact of Project traffic~~ after implementation of the condition of approval ~~mitigation program~~ described in Chapter 8. As it shows, the intersection of Sepulveda Boulevard & Jefferson Boulevard & Playa Street would exceed the criteria requested by Culver City Staff ~~remain impacted~~ according to City of Los Angeles criteria even after implementation of the original condition of approval included in the DEIR ~~mitigation program~~.

After discussions with Culver City staff, a new condition of approval and Project Design Feature was developed *to reduce the V/C ratio at Intersection #86*. The condition of approval would consist of the installation of triple left-turn lanes for the eastbound Jefferson Boulevard approach to northbound Sepulveda Boulevard, including associated signage and traffic signal improvements. The improvement would provide two left-turn lanes, one shared left-turn/through lane, and one shared through/right-turn lane in the eastbound direction. East/west split signal phasing and necessary traffic signal indications would be installed, pavement would be restriped, and signage would be enhanced to reflect the change. The improvement would have the effect of increasing capacity to the left-turn movement while decreasing through capacity

onto Playa Street, which is not designed or desired to handle the volume of traffic it currently experiences. Table C-3 summarizes the operation of this intersection under Existing and Future conditions with the implementation of the improvement. As shown, the improvement would ~~improve traffic conditions~~ *reduce the V/C ration below the criteria requested by Culver City Staff.*

36. Corrections and Additions to Appendix C Culver City Supplemental Analysis of Appendix E Traffic Study on page 3-99 of Part III of the LAX Northside Plan Update Final EIR has been revised as follows:

Revise Tables C-1 and C-2 and add Table C-3 to Appendix C Culver City Supplemental Analysis of Appendix E Traffic Study as follows:

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TABLE C-1
EXISTING WITH PROJECT CONDITIONS (YEAR 2012)
SIGNIFICANT INTERSECTION IMPACT ANALYSIS - CULVER CITY SUPPLEMENTAL ANALYSIS

No.	*Intersection*	*Peak Hour*	*Existing without Project*		*Existing with Project*			
			V/C	*LOS*	*V/C*	*LOS*	*Δ V/C*	*~~Impact~~ Exceed Culver City Staff's Criteria?*
23.	*Sepulveda Boulevard & Centinela Avenue*	*A.M.* *P.M.*	*0.743* *0.771*	*C* *C*	*0.759* *0.781*	*C* *C*	*0.016* *0.010*	*NO* *NO*
77.	*Sepulveda Boulevard & Washington Place*	*A.M.* *P.M.*	*0.624* *0.639*	*B* *B*	*0.627* *0.647*	*B* *B*	*0.003* *0.008*	*NO* *NO*
78.	*Sepulveda Boulevard & Washington Boulevard*	*A.M.* *P.M.*	*0.670* *0.659*	*B* *B*	*0.673* *0.665*	*B* *B*	*0.003* *0.006*	*NO* *NO*
79.	*Sawtelle Boulevard & Culver Boulevard*	*A.M.* *P.M.*	*0.614* *0.772*	*B* *C*	*0.617* *0.780*	*B* *C*	*0.003* *0.008*	*NO* *NO*
80.	*Sepulveda Boulevard & Culver Boulevard*	*A.M.* *P.M.*	*0.682* *0.668*	*B* *B*	*0.690* *0.678*	*B* *B*	*0.008* *0.010*	*NO* *NO*
83.	*Sepulveda Boulevard & Jefferson Boulevard*	*A.M.* *P.M.*	*0.470* *0.494*	*A* *A*	*0.474* *0.503*	*A* *A*	*0.004* *0.009*	*NO* *NO*
84.	*Sepulveda Boulevard & Sawtelle Boulevard*	*A.M.* *P.M.*	*0.477* *0.633*	*A* *B*	*0.479* *0.640*	*A* *B*	*0.002* *0.007*	*NO* *NO*
85.	*Slauson Avenue & Jefferson Boulevard*	*A.M.* *P.M.*	*0.343* *0.457*	*A* *A*	*0.348* *0.464*	*A* *A*	*0.005* *0.007*	*NO* *NO*
86.	*Sepulveda Boulevard & Jefferson Boulevard & Playa Street*	*A.M.* *P.M.*	*0.695* *0.875* *~~0.810~~*	*B* *D*	*0.699* *0.891* *~~0.826~~*	*B* *D*	*0.004* *0.016*	*NO* *NO*
87.	*Sepulveda Boulevard & Slauson Avenue &*	*A.M.* *P.M.*	*0.500* *0.718*	*A* *C*	*0.504* *0.735*	*A* *C*	*0.004* *0.017*	*NO* *NO*

TABLE C-2
FUTURE WITH PROJECT CONDITIONS (YEAR 2022)
SIGNIFICANT INTERSECTION IMPACT ANALYSIS - CULVER CITY SUPPLEMENTAL ANALYSIS

No.	Intersection	Peak Hour	Future without Project		Future with Project				Future with Project with Mitigation			
			V/C	LOS	V/C	LOS	Δ V/C	~~Impact~~ Exceed Culver City Staff's Criteria?	V/C	LOS	Δ V/C	~~Impact~~ Exceed Culver City Staff's Criteria?
23.	Sepulveda Boulevard & Centinela Avenue	A.M. P.M.	0.811 0.815	D D	0.827 0.826	D D	0.016 0.011	NO NO	0.826 0.826	D D	0.015 0.011	NO NO
77.	Sepulveda Boulevard & Washington Place	A.M. P.M.	0.678 0.707	B C	0.682 0.714	B C	0.004 0.007	NO NO	0.682 0.714	B C	0.004 0.007	NO NO
78.	Sepulveda Boulevard & Washington Boulevard	A.M. P.M.	0.692 0.669	B B	0.695 0.679	B B	0.003 0.010	NO NO	0.695 0.678	B B	0.003 0.009	NO NO
79.	Sawtelle Boulevard & Culver Boulevard	A.M. P.M.	0.648 0.798	B C	0.651 0.808	B D	0.003 0.010	NO NO	0.651 0.808	B D	0.003 0.010	NO NO
80.	Sepulveda Boulevard & Culver Boulevard	A.M. P.M.	0.714 0.707	C C	0.722 0.720	C C	0.008 0.013	NO NO	0.722 0.720	C C	0.008 0.013	NO NO
83.	Sepulveda Boulevard & Jefferson Boulevard	A.M. P.M.	0.527 0.553	A A	0.531 0.562	A A	0.004 0.009	NO NO	0.531 0.562	A A	0.004 0.009	NO NO
84.	Sepulveda Boulevard & Sawtelle Boulevard	A.M. P.M.	0.525 0.697	A B	0.530 0.706	A C	0.005 0.009	NO NO	0.530 0.705	A C	0.005 0.008	NO NO
85.	Slauson Avenue & Jefferson Boulevard	A.M. P.M.	0.402 0.510	A A	0.407 0.516	A A	0.005 0.006	NO NO	0.407 0.516	A A	0.005 0.006	NO NO
86.	Sepulveda Boulevard & Jefferson Boulevard & Playa Street	A.M. P.M.	0.771 0.991 ~~0.931~~	C E	0.775 1.007 ~~0.947~~	C F ~~E~~	0.004 0.016	NO **YES**	0.727 0.952 ~~0.946~~	C E	-0.044 -0.039 ~~0.115~~	NO NO
87.	Sepulveda Boulevard &	A.M.	0.532	A	0.536	A	0.004	NO	0.535	A	0.003	NO

	Slauson Avenue &	*P.M.*	*0.771*	*C*	*0.788*	*C*	*0.017*	*NO*	*0.787*	*C*	*0.016*	*NO*

Note: The Future with Project with Mitigation LOS results include only TDM reduction. The exceedance of Culver City Staff's criteria at Sepulveda Boulevard & Jefferson Boulevard & Playa Street could be improved by transportation systems management improvements at this location.

TABLE C-3
SEPULVEDA BOULEVARD & JEFFERSON BOULEVARD & PLAYA STREET
INTERSECTION ANALYSIS

No.	Intersection	Peak Hour	Existing / Future without Project		Existing / Future with Project		-	-	Existing / Future with Project with Condition of Approval (Project Design Feature)		-	-
			V/C	LOS	V/C	LOS	Δ V/C	Exceed ~~Alternative Threshold~~ Culver City Staff's Criteria?	V/C	LOS	Δ V/C	Exceed ~~Alternative Threshold~~ Culver City Staff's Criteria?
86.	Existing Conditions (Year 2012)	A.M.	0.695	B	0.699	B	0.004	NO	0.663	B	-0.032	NO
-	-	P.M.	0.875	D	0.891	D	0.016	NO	0.842	D	-0.033	NO
86.	Future Conditions (Year 2022)	A.M.	0.771	C	0.775	C	0.004	NO	0.727	C	-0.044	NO
-	-	P.M.	0.991	E	1.007	F	0.016	**YES**	0.952	E	-0.039	NO

37. Appendix B of the Final EIR starting on page B-69 of Part IV of the LAX Northside Plan Update Final EIR has been revised as follows:

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TABLE LAXN-AL07-3
SEPULVEDA BOULEVARD & JEFFERSON BOULEVARD & PLAYA STREET
INTERSECTION ANALYSIS

No.	Intersection	Peak Hour	Existing / Future without Project		Existing / Future with Project				Existing / Future with Project with Conditions of Approval (Project Design Features)			
			V/C	LOS	V/C	LOS	Δ V/C	Exceeds ~~Alternative Threshold~~ *Culver City Staff's Criteria?*	V/C	LOS	Δ V/C	Exceeds ~~Alternative Threshold~~ *Culver City Staff's Criteria?*
86.	Existing Conditions (Year 2012)	A.M. P.M.	0.695 0.875	B D	0.699 0.891	B D	0.004 0.016	NO NO	0.663 0.842	B D	-0.032 -0.033	NO NO
86.	Future Conditions (Year 2022)	A.M. P.M.	0.771 0.991	C E	0.775 1.007	C F	0.004 0.016	NO **YES**	0.727 0.952	C E	-0.044 -0.039	NO NO

TABLE LAXN-AL07-5
SUPPLEMENTAL CMP TRANSIT CAPACITY ANALYSIS USING 4% ANNUAL TRANSIT RIDERSHIP GROWTH

Morning Peak Hour						
Provider and Route	**Number of Runs During Peak Hour** [a]	**Capacity** [b]	**Existing (Year 2012) Load Factor** [c]	**Future (Year 2022) Load Factor** [d]	**Residual Capacity per Run**	**Residual Capacity in Peak Hour**
Metro Bus						
111/311	6	50	0.78	1.09	0	0
115	12	50	0.68	0.95	3	36
117	6	50	0.76	1.06	0	0
232	6	50	0.70	0.98	1	6
Metro Rail						
Green	14	152	0.39	0.55	68	952
LADOT Commuter Express						
574	6	49	0.49	0.69	15	90
Santa Monica Big Blue Bus						
3	9	60	0.63	0.88	7	63
R3	9	60	0.62	0.87	8	72
Torrance						
8	7	60	0.83	1.16	0	0
					Total Residual Capacity in Peak Hour	**1,219**

Notes:

Metro: Los Angeles County Metropolitan Transportation Authority.

LADOT: Los Angeles Department of Transportation

[a] Number of runs in both directions combined during peak hour.

[b] Capacity assumptions:

TABLE LAXN-AL07-5

SUPPLEMENTAL CMP TRANSIT CAPACITY ANALYSIS USING 4% ANNUAL TRANSIT RIDERSHIP GROWTH

Metro Regular Bus - 40 seated + 10 standing = 50.

Metro Articulated Bus - 66 seated + 9 standing = 75.

LADOT Commuter Express Bus - 49 seated.

Santa Monica Big Blue Bus - 50 seated + 10 standing = 60.

Torrance Transit - 45 seated + 15 standing = 60

[c] Existing Load Factors from Table 7 on page 48 of the traffic study.

[d] Future Load Factors are Existing Load Factors increased by 40% to reflect 10 years of transit ridership growth.

[e] Future capacity assumes no increase in transit supply. System loadings are cumulative rather than a result of the LAX Northside Project.

TABLE LAXN-AL07-6
SUPPLEMENTAL CMP TRANSIT IMPACT ANALYSIS USING 4% ANNUAL TRANSIT RIDERSHIP GROWTH

Description	Morning Peak Hour	Afternoon Peak Hour
Future without Project Capacity Surplus [a]	1,219	1,276
Project Transit Trips [b]	211	267
Future with Project Capacity Surplus	1,008	1,009

Notes:

[a] Future transit capacity surplus from Table 27.

[b] Project transit trips from Table 26.

[c] Future capacity assumes no increase in transit supply. System loadings are cumulative rather than a result of the LAX Northside Project.

TABLE LAXN-AL07-9
RIDERSHIP SURVEYS ON CULVER CITY BUS ROUTE 6 AND RAPID ROUTE 6

Route, Direction, and Day	Start Time	Max Load [a]	Residual Capacity [b]	Max Standing [c]	Stop Where Max Load Occurred	Load at Sepulveda & Manchester
Route 6						
Northbound						
AM Run 1 (Wednesday)	7:11 AM	35	45	3	Sepulveda & 76th	34
AM Run 2 (Thursday)	7:13 AM	30	50	3	Sepulveda & Manchester	30
PM Run 1 (Tuesday)	4:16 PM	27	53	3	Sepulveda & Lucerne	16
PM Run 2 (Wednesday)	4:17 PM	26	54	2	Sepulveda & Culver	16
Southbound						
AM Run 1 (Wednesday)	7:01 AM	20	60	0	Sepulveda & Braddock	7
AM Run 2 (Thursday)	7:04 AM	15	65	0	Sepulveda & Sawtelle [d]	9
PM Run 1 (Tuesday)	4:06 PM	42	38	10	Sepulveda & Washington [d]	11
PM Run 2 (Wednesday)	4:00 PM	40	40	8	Sepulveda & Pico [d]	13
Rapid Route 6						
Northbound						
AM Run 1 (Wednesday)	7:05 AM	47	33	12	Sepulveda & Playa [d]	39
AM Run 2 (Thursday)	7:04 AM	31	49	0	Sepulveda & National	22
PM Run 1 (Tuesday)	4:13 PM	12	68	0	Sepulveda & Venice [d]	10

TABLE LAXN-AL07-9
RIDERSHIP SURVEYS ON CULVER CITY BUS ROUTE 6 AND RAPID ROUTE 6

Route, Direction, and Day	***Start Time***	***Max Load*** *[a]*	***Residual Capacity*** *[b]*	***Max Standing*** *[c]*	***Stop Where Max Load Occurred***	***Load at Sepulveda & Manchester***
PM Run 2 (Wednesday)	*4:00 PM*	*16*	*64*	*0*	*Sepulveda & Venice*	*8*
Southbound						
AM Run 1 (Wednesday)	*6:59 AM*	*14*	*66*	*0*	*Sepulveda & Washington*	*9*
AM Run 2 (Thursday)	*7:05 AM*	*36*	*44*	*0*	*Sepulveda & Slauson*	*32*
PM Run 1 (Tuesday)	*4:20 PM*	*37*	*43*	*9*	*Sepulveda & Santa Monica*	*14*
PM Run 2 (Wednesday)	*4:09 PM*	*62*	*18*	*20*	*Sepulveda & Sawtelle*	*51*

Counts were conducted between Tuesday, February 24, 2015 and Thursday, February 26, 2015.

Note: Route 6 and Rapid Route 6 use 40-foot buses with seated capacity of 40 and standing capacity of up to 80.

[a] Maximum load describes the highest number of riders anywhere on the line, and includes seated and standing transit riders.

Residual capacity was calculated as the difference between the full capacity (assumed to be 80 riders) and the maximum

[b] load.

[c] Maximum number of riders standing does not necessarily occur at the same location as the maximum load.

[d] The maximum load was reported at more than one stop. The listed stop is that which is closest to the Project Site.