DEPARTMENT OF CITY PLANNING

RECOMMENDATION REPORT

Department of Transportation

Date: May 24, 2013

Public Hearing: Public Hearing held February 13, 2013

Reference Council File Nos.: 10-2385-S1, 10-2385-S2
CEQA No.: ENV-2013-1233-SE
Council No.: 1-Reyes, 14-Huizar
Plan Area: Northeast Los Angeles

PROJECT LOCATION

The project area is located in portions of the Northeast Community Plan. The project is located in the public right-of-way along N. Figueroa Street bounded by San Fernando Road to the southwest and Colorado Boulevard to the northeast and along Colorado Boulevard from the Los Angeles / Glendale City limits to the west and Avenue 64 to the east.

PROPOSED PROJECT

The Proposed Project is part of 40.4 miles of new bicycle lanes proposed as part of the First-Year of the First Five Year Implementation Strategy of the 2010 Bicycle Plan.[1] The Proposed Project implements several programs of the 2010 Bicycle Plan, which includes completion of a backbone bicycle network. The Proposed Project consists of 8.1 miles of new bicycle lanes (including 5.1 miles of a combination of standard and buffered bicycle lanes along N. Figueroa Street, from San Fernando Road to Colorado Boulevard, and 3 miles of a combination of standard and buffered bicycle lanes along Colorado Boulevard, from Glendale City limit (200' east of Lincoln Avenue) to Avenue 64 that would be striped within the existing right-of-way (**Table 1**). Buffered bicycle lanes are proposed along the southern portion of N. Figueroa Street, from Avenue 28 to York Boulevard, and along Colorado Boulevard, from Sierra Villa Drive and the SR-134 on/off ramps. **Figure 1** shows the location of the proposed new bicycle lanes in relation to the existing bicycle lanes.

The Proposed Project would include restriping only. No excavation or construction is contemplated in connection with the proposed bicycle lanes. Implementation of the proposed bicycle lanes would not change access to existing facilities and properties.

[1] *A Draft EIR was prepared and made available on January 17th, 2013 that evaluated the traffic and safety impacts of 39.5 miles proposed bicycle lanes not including the Proposed Project. The Proposed Project was introduced later after the release of the Draft EIR and was evaluated in a separate Traffic and Safety Assessment pursuant to the procedures of Section 21080.20.5 of the Public Resource Code (PRC).*

TABLE 1: PROPOSED BICYCLE LANES - STREET SEGMENTS			
Street / Facility Type	**Limits**	**Length (miles)**	**Area/Connection**
N. Figueroa St. / standard bicycle lanes	San Fernando Rd. to Colorado Blvd.	5.1	Northeast/ Glendale – Eagle Rock - Pasadena
Colorado Blvd. / standard and buffered bicycle lanes	Glendale City limit (200' e/o Lincoln Ave.) to Ave 64	3.0	Northeast/Cypress Park - Mt. Washington – Highland Park - Eagle Rock
TOTAL		8.1	Northeast
SOURCE: City of Los Angeles, LADOT, 2012.			

The Proposed Project would reduce traffic lanes in several segments along N. Figueroa Street. On N. Figueroa Street, between San Fernando Road and the I-110 on/off ramps, one northbound lane would be eliminated. On N. Figueroa Street, between the I-110 on/off ramps and York Boulevard, one southbound lane would be eliminated leaving two northbound travel lanes and one southbound travel lane. On N. Figueroa Street, between York Boulevard and Colorado Boulevard, a full travel lane would be eliminated in each direction, leaving one northbound travel lane and one southbound travel lane. The proposed project would also eliminate one travel lane along Colorado Boulevard, in each direction, from Sierra Villa Drive and Avenue 64.

The implementation of the Proposed Project would result in greater bicycle network benefits in Northeast Los Angeles by connecting to the existing standard bicycle lanes (along York Boulevard, Avenue 50, Cypress Avenue and Eagle Rock Boulevard), thereby facilitating inviting and safe bicycle travel from the northeast neighborhoods of Mount Washington, Cypress Park, Highland Park, and Eagle Rock into the Cities of Glendale and Pasadena as well as the Central City area.

REQUESTED ACTIONS

1. That the Department of Transportation (LADOT) install 8.1 miles of new bicycle lanes (including 5.1 miles of a combination of standard and buffered bicycle lanes along N. Figueroa Street from San Fernando Road to Colorado Boulevard and 3 miles of a combination of standard and buffered bicycle lanes along Colorado Boulevard from Glendale City limit (200' east of Lincoln Avenue) to Avenue 64) in accordance with the 2010 Bicycle Plan.

2. That the Department of Transportation (LADOT) determine that the 5.1 miles of new bicycle lanes along N. Figueroa Street from San Fernando Road to Colorado Boulevard and 3 miles of bicycle lanes along Colorado Boulevard from Glendale City limit (200' east of Lincoln Avenue) to Ave 64 are exempt from CEQA pursuant to Public Resource Code (PRC) Section 21080.20.5.

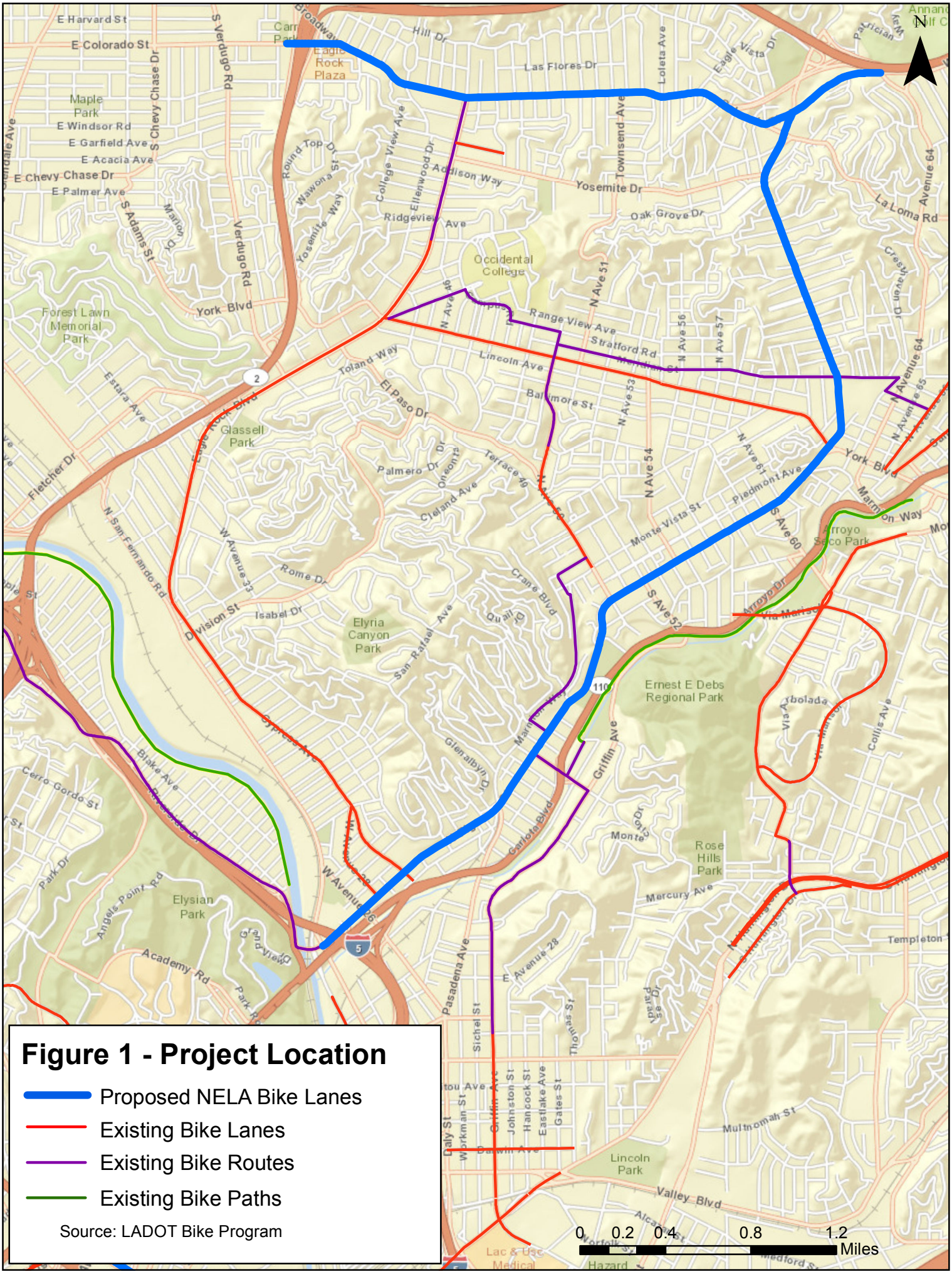
Figure 1 - Project Location
Proposed NELA Bike Lanes
Existing Bike Lanes
Existing Bike Routes
Existing Bike Paths
Source: LADOT Bike Program
0 0.2 0.4 0.8 1.2
Miles
N
E Harvard St
E Colorado St
S Verdugo Rd
S Chevy Chase Dr
Maple Park
E Windsor Rd
E Garfield Ave
E Acacia Ave
E Chevy Chase Dr
E Palmer Ave
S Adams St
Marion Dr
Verdugo Rd
Broadway
Eagle Rock Plaza
Hill Dr
Las Flores Dr
Loleta Ave
Eagle Vista Dr
Townsend Ave
Round Top Dr
Wawona St
College View Ave
Ellenwood Dr
Addison Way
Yosemite Way
Ridgeview Ave
Yosemite Dr
Oak Grove Dr
La Loma Rd
Occidental College
N Ave 51
N Ave 56
N Ave 57
Range View Ave
Stratford Rd
Lincoln Ave
Baltimore St
N Ave 53
N Ave 54
N Ave 61
Piedmont Ave
York Blvd
Avenue 64
Avenue 65
Forest Lawn Memorial Park
York Blvd
Toland Way
El Paso Dr
Eagle Rock Blvd
Estara Ave
Fletcher Dr
Glassell Park
Palmero Dr
Oneonta
Terrace 49
Cleland Ave
Monte Vista St
S Ave 60
Marmion Way
Arroyo Seco Park
N San Fernando Rd
W Avenue 33
Rome Dr
Division St
Isabel Dr
Elyria Canyon Park
San Rafael Ave
Crane Blvd
Quail Dr
S Ave 53
Arroyo Dr
Via Marisol
Ernest E Debs Regional Park
Via Arbolada
Collis Ave
Griffin Ave
Glenalbyn Dr
Marmion Way
Cypress Ave
Blake Ave
Cerro Gordo St
Riverside Dr
Park Dr
Angels Point Rd
Elysian Park
Academy Rd
Grand View Dr
W Avenue 26
Garlota Blvd
Monte Cyro Dr
Rose Hills Park
Mercury Ave
Templeton
Pasadena Ave
E Avenue 28
Sichel St
Thomas St
Lacy St
Workman St
Griffin Ave
Johnston St
Hancock St
Eastlake Ave
Gates St
Daswin Ave
Multnomah St
Lincoln Park
Valley Blvd
Alcazar St
Lac & Usc Medical
Hazard
Medford St

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BACKGROUND

2010 Bicycle Plan Implementation

The City of Los Angeles adopted the 2010 Bicycle Plan (Bicycle Plan) on March 1, 2011. The Bicycle Plan identifies a 1,684-mile bikeway system and includes a comprehensive collection of programs and policies.

The Bicycle Plan establishes the Five-Year Implementation Strategy as a logical process to design, analyze and build 1,227 miles, on the Backbone and Neighborhood Networks, in five-year increments, within the next 35 years. Program 1.1.2 C of the 2010 Bicycle Plan calls for funding and construction of at least 200 miles of on-street bicycle facilities on the Backbone and Neighborhood Networks every five years, until the networks are complete.

At the time of adoption, the bicycle lanes that were included in the 2010 Bicycle Plan were in various stages of planning. Some were well defined, but others required additional study to determine exact routes and/or roadway design. To the extent that impacts of the Bicycle Plan could be analyzed they were addressed in a Mitigated Negative Declaration. However, as some bicycle lanes are further defined it has become apparent that some require additional analysis because the implementation could potentially impact travel delay. In general, bicycle lanes typically have the potential to significantly impact traffic (as well as related environmental issues such as air quality) if the result is a loss of a travel lane in a high-traffic area, or the loss of a parking lane, adjacent to land uses, without off-street parking available. The implementation of the Proposed Project would require the removal/reallocation of mixed-flow travel lanes and as such would potentially result in travel delay requiring further traffic and safety analysis.

Statutory Exemption Requirements

On September 2012, Governor Brown signed Assembly Bill (AB) 2245 (adding Section 21080.20.5 to the Public Resources Code (PRC)), which allows (through January 1, 2018) a Statutory Exemption from the California Environmental Quality Act (CEQA) for the striping of new bicycle lanes, on existing urban streets, that are lanes included in an adopted bicycle transportation plan.

Projects eligible for the statutory exemption must still assess project-related traffic and safety impacts, identify traffic and safety mitigation measures, hold noticed public hearings in areas affected by the project, and respond to public comments.

DISCUSSION

It was determined that the Proposed Project qualified for the Statutory Exemption and therefore the City initiated a traffic and safety assessment, identified mitigation measures, and held a public hearing.

Traffic and Safety Assessment

The City initiated a Draft Environmental Impact Report (EIR), for the First Year of the First Five-Year Bicycle Plan Implementation Strategy and Figueroa Streetscape Project prior to the passage of AB 2245. Since the Draft EIR included the traffic and safety impacts of the Proposed Project, it serves as the traffic and safety assessment of the Proposed Project as required by 21080.20.5 (b)(1) of the PRC. As shown in Table 2, the traffic analysis concluded that the implementation of the proposed bicycle lanes would result in a significant and unavoidable impact due to travel delay at three intersections in both the AM and PM peak periods along N. Figueroa Street and three intersections in both the AM and PM peak periods along Colorado Boulevard. The Proposed Project would result in a total of five impacted intersections. Traffic impacts on parallel facilities, resulting from trip redistribution, is not expected since parallel arterial streets along these portions of N. Figueroa Street and Colorado Boulevard are not available to serve the same purposes to attract cut-through traffic.

TABLE 2: INTERSECTION LEVEL OF SERVICE: PROPOSED PROJECT

Street	Study Intersection[1]	AM Peak Hour					PM Peak Hour				
		Post Project Delay (sec)	Change in Delay (sec)	LOS Pre	LOS Post	Sig Impact	Post Project Delay (sec)	Change in Delay (sec)	LOS Pre	LOS Post	Sig Impact
N. Figueroa St.	Colorado Blvd	56.2	30.5	C	E	YES	40.1	19.5	C	D	YES
	York Blvd	66.4	41.5	C	E	YES	46.1	17.3	C	D	YES
	Pasadena Ave	25.3	5.6	B	C	NO	13.4	0.2	B	B	NO
	Ave 26	149.5	95.4	D	F	YES	45.7	6.8	D	D	YES
	San Fernando Rd	14.3	-0.7	B	B	NO	21.6	5.6	B	C	NO
Colorado Blvd.	SR-2 NB Ramps	17.3	0.1	B	B	NO	16.7	0	B	B	NO
	Broadway	12.8	-0.4	B	B	NO	17	-0.1	B	B	NO
	Sierra Villa Dr[2]	50.7	27.2	C	D	YES	350.9	203.6	F	F	YES
	Eagle Rock Blvd[2]	55.7	22.4	C	E	YES	115.5	64.3	D	F	YES
	SR-134 Ramps	19.4	-3.9	C	B	NO	19	4.3	B	B	NO
	N. Figueroa St	56.2	30.5	C	E	YES	40.1	19.5	C	D	YES

Source: LADOT, 2012

(1) Figueroa Street/Colorado Boulevard is a duplicate study intersection where a study street meets another study street.

(2) Due to error in traffic counts, the results were revised from the impacts reported in the Draft EIR. See Attachment 2, Corrections and Additions.

The Proposed Project would result in a significant travel delay at three intersections during both the AM and PM peak periods along N. Figueroa Street. All five study intersections currently operate at LOS D, or better, in the AM and PM peak hours. The Proposed Project would cause three intersections to operate at LOS E or F in the AM peak hour. These intersections would continue to operate at LOS D, or better, conditions in the PM peak hour. It is noted that during the AM peak hour, the intersection of N. Figueroa Street and San Fernando Road would experience a minor decrease in delay. This intersection's most congested movement is the southbound left turn from Figueroa Street to San Fernando Road. The project would change the

northbound shared lane into a right turn lane. This change would make it easier for the left turning vehicles, from Figueroa Street, to perceive the oncoming traffic and make their turn, reducing the intersection delay.

The Proposed Project would result in a significant travel delay at three intersections during both the AM and PM peak periods along Colorado Boulevard. All six study intersections currently operate at LOS C or better in the AM peak hour, and there is one intersection operating at LOS E or F in the PM peak hour. With the Proposed Project, the number of intersections operating at LOS E or F conditions would increase, to two, in the AM and PM peak hours.[2]

The traffic analysis, in the Draft EIR, found that the Proposed Project would increase bus travel times along both N. Figueroa Street and Colorado Boulevard and would further result in a substantial increase in bus travel delay along Colorado Boulevard.[3] It also found that the Proposed Project would result in either less than significant impacts or no impacts to General Plan consistency and emergency access. There would be no loss of on-street parking as the result of the Proposed Project and thus it would have no impact on parking.

With the implementation of the proposed bicycle lanes, it is anticipated that bicyclists would benefit from improved safety due to the designation of a clear right-of-way for their use. The safety benefits would even be greater where additional buffer separation is provided, between the bicycle lane and the adjacent travel lane, such as proposed along Colorado Boulevard and the segment of N. Figueroa Street between York Boulevard and San Fernando Road.

The Traffic and Safety Assessment found that the Proposed Project would improve bicycle accessibility, connectivity and safety, and would encourage bicycle use (potentially resulting in improved health of the population), would not decrease the safety of bicyclists, pedestrians and transit riders. Rather, the proposed bicycle lanes would significantly improve bicycle safety, as well as safety for all road users, by installing bicycle lanes along N. Figueroa Street and Colorado Boulevard.

Mitigation Measures

The Draft EIR recommended the following mitigation measures relevant to the Proposed Project to reduce impacts to traffic circulation:

MM T1: LADOT will adjust traffic signal timing after the implementation of the proposed bicycle lanes (both along project routes and parallel roadways if traffic diversions have occurred as a result of the proposed bicycle lanes). Signal timing adjustment could reduce traffic impacts at impacted intersections. (LADOT routinely makes traffic signal timing changes and signal optimization on an as-needed basis to accommodate the changes in traffic volumes to reduce congestion and delay in the City.)

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[2] *The traffic LOS was revised since publication of the Draft EIR. See Attachment 2, Corrections and Additions.*

[3] *Study areas with aggregated delays of five minutes or longer were considered to have a substantial increase transit travel time for the bus routes operating in mixed traffic.*

MM T2: The City shall implement appropriate Transportation Demand Management (TDM) measures in the City of Los Angeles including potential trip-reducing measures such as bike share strategies, bike parking, expansion of car share programs near high density areas, bus stop improvements (e.g. shelters and "next bus" technologies), crosswalk improvements, pedestrian wayfinding signage, etc. (Such improvements shall also be required of private projects in the project area as part of the review and approval process.)

The Traffic and Safety Assessment recommended the following mitigation measure to reduce impacts from the construction phase:

MM T5: Construction activities will be managed through the implementation of a traffic control plan to mitigate the impact of traffic disruption and to ensure the safety of all users of the affected roadway. The plan will extend for the duration of construction and could include such measures as a temporary traffic signal or the use of flagmen as appropriate.

Public Hearing

The Department of City Planning (DCP) held a total of four public hearings for the proposed bicycle lanes included in the First Year of the First Five-Year Implementation Strategy. The hearings were located in areas affected by the proposed bicycle lanes as required by PRC Section 21080.20.5 (b)(2). For the purposes of the public hearing, the Proposed Project was included with the other proposed bicycle lanes in the First Year of the First Five-Year Implementation Strategy that were proposed in the northeast area of the City. The DCP held this public hearing on February 13, 2013 at the Los Angeles River Center at 570 W. Avenue 26, attended by 56 members of the public. At the hearing, LADOT and DCP staff were available to present the Proposed Project, and summarized the results of the assessment of traffic and safety impacts as described above. Additionally, one webinar-style public hearing was held on February 20th where interested public could provide feedback on all of the proposed bicycle lanes in the First Year of the First Five-Year Implementation Strategy.

A Notice of Availability (NOA) of the Draft EIR and Public Hearing was included in the January 17th, 2013 edition of the Los Angeles Times in compliance with Section 21080.20.5 (b)(2) of the PRC. Additionally, notices were sent to multiple public agencies and organizations including Metro, the City Council offices and neighborhood councils with jurisdiction in the area. Notices were also distributed electronically to over 1,400 individuals who were either participants involved in the adoption of the 2010 Bicycle Plan or have been involved in the implementation process. Hard copies of the Draft EIR were made available at the Arroyo Seco Regional Library, 6145 N. Figueroa Street, as well as the City Clerk Vault, and the Department of City Planning offices in City Hall. An electronic copy of the Traffic and Safety Assessment was made available on the Department of City Planning website, and information about the electronic copy was included on the notices described above.

Summary of Public Hearing Testimony

Of the 56 people attending the public hearing, 31 gave verbal testimony during the hearing and three submitted written comments at the hearing. Of the 31 who gave verbal testimony, 27 spoke in support of implementing the bicycle lanes in the First Year of the First Five-Year Implementation Strategy in the Northeast Area (the Proposed Project), while four were opposed. In addition to those present at the public hearing, two comments were submitted after the public hearing during the comment period that addressed the Proposed Project. Of the letters received, five were in favor of the Proposed Project.

The comments favorable about the Proposed Project stated that the proposed bicycle lanes would create safer riding conditions by allocating space for the bicyclist whereas currently, bicyclists must contend with mixed-flow traffic. The comments also indicate that the Proposed Project would provide a much needed connections in Northeast Los Angeles, improve access to destinations including local businesses, and result in traffic calming attributed to the revised roadway allocation. The comments stated that these benefits would outweigh the cost of increases in travel delay that would result from the Proposed Project.

The comments opposed to the Proposed Project were concerned about increases in travel delay, and how the travel lane reduction would impair access to local businesses. Others mentioned concern over potential impacts to emergency services, and the travel delay that could exacerbate the use of N. Figueroa by truck traffic.

LADOT and DCP have participated in subsequent meetings and outreach related to the Proposed Project in coordination with the two City Council Offices, Council District (CD) 1 and Council District (CD) 14. The responses at the meetings were similar to what was received at the public hearing. Any new discussion items that were not received during the comment period are included below.

Summary of Key Issues from Comments Received

The Draft EIR was made available on January 17th, 2013 for a 45-day comment period that ended on March 4th, 2013. Comments on the analysis were received at the public hearing as described above, and submitted electronically and by mail. The following discussion highlights key issues that were raised, during the public comment period, by members of the public, as they relate to the Proposed Project. Since the Draft EIR evaluated over 40 miles of proposed bicycle lanes included in the First Year of the First Five Year Implementation Strategy, not all comments had direct relevance to the analysis of the Proposed Project. However, responses to comments that addressed the analysis in general have been included. A complete set of responses, to the comments received on the Draft EIR analysis in general and as they relate to the Proposed Project, are included as Attachment 1 of this Report. Responses that address impacts to other bicycler lanes, not including the Proposed Project, proposed as part of the First

Year of the First Five Year Implementation Strategy either were,[4] or will be, addressed in subsequent staff reports.

Safety Concerns and Benefits

Many comments were submitted stating the safety benefits that would result from installing bicycle lanes along N. Figueroa Street and Colorado Boulevard. These comments generally articulated that reducing a travel lane would provide the added benefit of reducing overall travel speeds, which would in turn benefit bicyclists, pedestrians and other motorists. Comments observed that traffic fatalities are higher where Colorado Boulevard traverses Los Angeles than through Glendale or Pasadena. With three travel lanes in each direction, Colorado Boulevard has excess capacity during non-peak travel times that is seen to encourage speeding. One organization, Take Back the Boulevard, referred to a survey they conducted of select residents that identifies traffic speeds and road width as a substantial barrier for pedestrians crossing Colorado Boulevard. The segment of N. Figueroa Street between York Boulevard and Yosemite Drive was mentioned as being difficult for bicyclists to share within a travel lane. Another comment urged DCP to evaluate the number of collisions before, and after, implementation of the bicycle lanes to determine the positive or negative impacts on safety.

These same comments stated the potential for the travel lane reduction to reduce the crossing distance, thereby contributing to a safer pedestrian environment and providing an important benefit around the areas' schools. Other comments mentioned that the Proposed Project would help to improve the pedestrian environment by attracting more bicyclists to ride in the street thereby reducing pedestrian/bicycle conflicts on sidewalks. The bicycle lanes are also seen to increase safety, especially in locations of greater topography where there is a need to separate slow-climbing bicyclists from faster moving vehicular traffic. These comments also generally supported implementing buffered bicycle lanes as they would provide added protection for bicyclists between faster moving traffic and the door zone of parked cars. They would help to create a low-stress bicycle network that would be attractive to those that currently do not travel by bicycle.

Opponents to adding bicycle lanes also cited safety concerns in stating the perception that bicyclists endanger other road users because they generally do not observe traffic rules. Others raised concerns that the installation of bicycle lanes would only encourage more people to engage in a perceived unsafe activity where they will have to compete with fast moving vehicles and merging bus traffic.

The Draft EIR assessed the safety of the Proposed Project (see page 3-5 and 3-6 as well as 4.5-33 of the Draft EIR) and found that the effective reduction in travel lanes would help to reduce travel speeds, and thereby the installation of bicycle lanes would

[4] *Sunset Boulevard (From Figueroa St to Douglas St) Staff Recommendation Report was made available on April 1st, 2013. Available here:*

http://cityplanning.lacity.org/cwd/gnlpln/transelt/NewBikePlan/Txt/First%20Year(Sunset%20Blvd)%20Staff%20Report_04.01.13.pdf

result in a direct safety benefit. The addition of bicycle lanes on arterial streets is shown to reduce the risk of serious injuries by about 30 percent.[5] According to studies in other Californian cities, per capita injury rates to pedestrians and bicyclists are shown to fall as the level of bicycling increases.[6] Increases in bicycling rates through the country are seen as a direct response to investment in bicycle supporting infrastructure.[7] While some percentage of bicyclists may observe poor judgment in disregarding traffic rules, reasons for this may stem from current road conditions that attract a higher amount of risk prone bicyclists. Adding low stress facilities such as buffered bicycle lanes have a greater potential to encourage the more risk adverse bicycle riding population that would likely have greater observance of traffic rules.

Traffic Delay

Some commenters expressed comfort with increased travel delay, while others expressed opposition to the installation of bicycle lanes if it required the removal of travel lanes. Comments that were comfortable with an increase in travel delay indicated that the safety and network benefits outweighed the costs of additional travel delay.

Those opposed to the removal of travel lanes expressed concern that their quality of life would decline as a result of the increased congestion. They are concerned that infrequent traffic back-ups, experienced during past lane closures, would become the norm. They also expressed a viewpoint that the bicycle lanes would benefit only a small minority as they believe many are not able to bicycle for transportation due to lifestyle constraints. Some stated that the neighborhoods that comprise Northeast Los Angeles are attractive to residents because they have not experienced the extent of congestion felt in other areas of the City.

As discussed above, the traffic analysis found that the Proposed Project would result in significant travel delay at three intersections along N. Figueroa Street and three intersections along Colorado Boulevard. However, the analysis conservatively assumes that there would be no shift in existing travel choice as the result of the new bicycle lanes. Bicycle riding as a travel mode is anticipated to increase as greater connectivity is achieved. A recent examination of 70 case studies, of other roadways where capacity was reallocated to accommodate more bicyclists and pedestrians, reveals that the true traffic impacts are rarely as bad as predicted and that in 73 percent of the cases, traffic was actually less than before the changes were was implemented. The unexpected (from a modeling perspective) reduction in traffic is largely due to the fact that traditional Level of Service (LOS) analysis for roadway changes does not account for changes in travel behavior.[8]

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[5] Kay Teschke et al. 2012. Route Infrastructure and the Risk of Injuries to Bicyclists: A Case-Crossover Study. American Journal of Public Health.

[6] Jacobsen, P.L. 2003. Safety in Numbers: More Walkers and Bicyclists, Safety Walking and Bicycling. Injury Prevention 9~3!:205–209.

[7] Dill, Jennifer and Theresa Carr. 2003. Bicycle Commuting and Facilities in Major Cities: If You Build Them, Commuters Will Use Them. Transportation Research Record 1828:116-123

[8] Cairns *S*, Atkins *S*, Goodwin P (2002) *Disappearing traffic*? *The story so far*. Municipal Engineer, vol. 151, pp 13–22

Neither the 2010 Bicycle Plan, nor the traffic and safety analysis in the Draft EIR, assumes that all segments of the population will use the bicycle lanes. The growth in bicycle ridership in general, as a result of new bikeways, is not expected from those who either lack interest or whose lifestyle prohibits them from bicycling on a regular basis. Rather, growth in bicycle ridership, due to the build-out of bike facilities, is mostly expected from people who already ride occasionally for convenience or recreation, or show an interest in doing so.

Some comments also mentioned how N. Figueroa Street functions as a truck route creating a higher traffic demand on the roadway to carry regional truck traffic.

Trucks would experience the same impacts as motor vehicle traffic and would not be disproportionately impacted. Trucks above 6,000 pounds are restricted from the State Route (SR)-110 between U.S. Route 101 and the SR-110 terminus in Pasadena, though truck movements through this area would continue to be facilitated by the I-5, SR-2 and SR-134. Some truck operations may use the N. Figueroa Street to access local businesses, though N. Figueroa Street is not an officially designated truck route. However, these commercial delivery operators have greater flexibility in altering the delivery schedules to off-peak periods to avoid impacts to travel times.

Network Benefits

Some comments, including bicycle advocacy organizations such as the Los Angele County Bicycle Coalition (LACBC) identified North Figueroa and Colorado Boulevard as high priority corridors to implement, due to their benefits in completing the bicycle network in Northeast Los Angeles that currently includes York Boulevard, Cypress Avenue, parts of Eagle Rock Boulevard, and Avenue 50. Many of the commenters expressed support for the bicycle lanes due to the resulting bikeway network that would provide better access to the high number of destinations in the area, including transit and housing. These comments expressed a preference to implement buffered bike lanes along most of the corridors in order to maximize safety benefits. Preference for buffered bicycle lanes was seen to encourage higher ridership from less confident bicycle riders, such as female bicycle riders. The Proposed Project was also seen to benefit children as the buffered bicycle lanes would provide them a safe, on non-auto travel to get to school.

The Proposed Project includes additional buffer separation between the bicycle lane and the adjacent travel lane for most of the segment along Colorado Boulevard and the segment of N. Figueroa Street between York Boulevard and San Fernando Road.

Other comments submitted from residents in the area identified bicycling as their main travel choice for commuting from Northeast Los Angeles to other parts of the City. Opponents of the Proposed Project indicated that, from their perspective, there is currently sufficient room for bicycling in the existing road configuration. They also perceive that the existing bicycle lanes on York Boulevard and Eagle Rock Boulevard are poorly utilized. Some comments also indicated that the hilly terrain along Colorado Boulevard would be a barrier for bicyclists.

The LACBC conducted bicycle counts in 2009 and 2011 that included intersections at York Boulevard and Avenue 50 as well as N. Figueroa Street and Pasadena Avenue. Bicycle Counts were also conducted at Colorado Boulevard and Eagle Rock Boulevard in 2011. According to the 2011 bicycle count data, bicycle counts for York Boulevard and Avenue 50, N. Figueroa Street and Pasadena Avenue, and Colorado Boulevard and Eagle Rock Boulevard intersections during the peak P.M. peak period (between 4 P.M. and 6 P.M.) were 70, 136 and 51 respectively. Bicycle ridership at the York Boulevard and Avenue 50 intersection increased by 140 percent in the two years between 2009 and 2011, the second highest increase in the City shown during this time period. [9] Bicycle lanes were installed on York Boulevard in 2010, which may have been a contributing factor to the increase in ridership.[10] Both national studies and feedback from the local bicycle community state that the lack of bicycle facilities deters people from bicycling.

Economic Costs and Benefits

Some of the comments in support of the Proposed Project predicted that the bicycle lanes would enhance the economic vibrancy of Colorado Boulevard businesses by slowing traffic during non-peak periods, and providing increased access for pedestrians and bicyclists that would likely support local businesses. One organization, Take Back the Boulevard, referred to a survey they conducted that indicated that 22 percent of respondents access local business by bicycle. The same survey indicated that bicycle for non-work travel will increase if bicycle lanes are installed.

Some of the comments in opposition, expressed concerns that travel delay would negatively impact local businesses along N. Figueroa Street. The comment further asserted that bicycle lane utilization is low along York Boulevard (where LADOT has removed a travel lane), and that the resulting subsequent travel delay has harmed local business there. Another commenter suggested that DCP conduct a cost/benefit analysis of the lane being allocated to bicycles versus cars. The bases of the concern appear from the perception that benefits appear to be disproportionately serving few bicyclists over the majority of drivers as expressed above.

A Bikes Belong grant supported study conducted by the Los Angeles County Bicycle Coalition evaluated the economic impacts of the bicycle lanes along York Boulevard, which required a removal of a travel lane (road-diet).[11] The study compiled data on business taxes, business closures and openings and property sales records and found no significant difference to economic activity along York Boulevard after the road diet was implemented. The study included a survey that found that most merchants did not feel that bicycle lanes would hurt their business, but a large percentage of merchant and customers were hesitant to support bicycle lanes that would remove a travel lane. However, the study also demonstrated that merchants, on average, underestimate the percentage of their costumers that arrive by some means other than the car.

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[9] *LACBC. (2011) L.A. Bike Count: Results from the 2011 City of Los Angeles Bicycle and Pedestrian Count. Pp.27*

[10] *Ibid. Pp.28*

[11] *McCormick, Cullin. (2012) York Boulevard., Economic of a Road Diet. UCLA Luskin School of Public Affairs*

While socioeconomic issues are not required by CEQA, unless they lead to physical environmental impacts, the Draft EIR references cost benefits as part of the safety impact discussion as a footnote for informational purposes. The safety benefit/cost analysis methodology used was established for allocating funding under CalTrans' implementation of the federal Highway Safety Improvement Program (HSIP). Since the programmatic goals of the HSIP are to increase safety of the roadways, economic costs of travel delay are not considered as part of the evaluation. In order for bicycle lanes to be eligible for the AB 2245 exemption, a safety impact discussion is required, but the calculation of economic costs due to travel delay is not.

Another comment urged DCP to evaluate factors, such as retail sales and property values before, and after, implementation of the bicycle lanes, to determine positive or negative impacts on livability. While the Bikes Belong study was not part of a formal City program, Policy 3.2.6 of the 2010 Bicycle Plan seeks to establish a means to measure the economic impact of bikeway improvements on commercial corridors. A part of such program could include collecting data on business taxes and property sales records for a given period to monitor patterns in response to bikeway improvements.

Bicycle Lanes on Alternative Streets

Some of the comments in opposition to bicycle lanes suggested directing bicyclists to use alternative streets than those included in the Proposed Project. One suggested an alternative to bicycle lanes along N. Figueroa Street that included Marmion Way, Avenue 50, Monet Vista, Avenue 59 and Piedmont Avenue. Another suggested that a bikeway be included on Avenue 64 instead of N. Figueroa Street, north of York Boulevard. Commenters suggested both Yosemite Drive and Los Flores Drive as alternatives to bicycle lanes along Colorado Boulevard.

Some of the streets that were offered as alternatives fail to provide a complete network connection, while other proposed alternatives do not connect bicycle riders to their preferred destinations. Some of the alternative streets also lack the width necessary to install bicycle lanes while maintaining one travel lane in each direction along with on-street parking.

Other comments suggested that instead of installing bicycle lanes, the City could focus on providing bicycle and motorist education, improved lane marking and signage, and installing more bicycle parking. Many of these programs are currently included in the 2010 Bicycle Plan, however, none independently has been shown to increase bicycle ridership as much as bicycle lanes.

Design Features

There were several requests by bicycle lane supporters to install a buffered bicycle lane along the entire length of Colorado Boulevard, and to continue the bicycle lane on N. Figueroa Street southwest of Avenue 26 to San Fernando Road. There was also support for completing bicycle lanes on Eagle Rock Boulevard, from its current terminus, north to Colorado Boulevard to complete the network connection.

The Draft EIR evaluated the installation of a buffered bicycle lane on most of Colorado Boulevard and as well as bicycle lanes along N. Figueroa Street including the intersection at Avenue 26. LADOT is currently reviewing the completion of bicycle lane striping on Eagle Rock Boulevard.

Some commentors concerned about the potential travel delay prefer that (for just the portion of N. Figueroa Street in proximity to the Gold Line train crossing) 'sharrows' be installed instead of bicycle lanes. Other comments suggested the intersection design treatments emphasize the bicyclists' path of travel and protect turn movements (bike boxes). These design options shall be forwarded to LADOT for consideration.

Some of the comments requested that signal timing should be calibrated to encourage traffic to move at the lower prevailing peak travel speeds, as opposed to the posted speed limit in order to encourage slower traffic flow.

LADOT shall make adjustments to signal timing once the bicycle lanes are installed as part of Mitigation Measure T1 to facilitate safe and efficient traffic movement for all roadway users.

Environmental Benefits

Some commenters suggested that traffic congestion induced by the bicycle lanes, would likely lead to increased air quality problems, while others thought that the bicycle lanes would help to improve air quality in the long run. Pages 4.1-15 to 4.1-16 of the Draft EIR found that the Proposed Project's impacts on air quality would be less than significant. In addition, potential improvements in air quality are discussed on pages 3-6 to 3-7 of the Draft EIR as a project benefit, resulting from the encouragement of a non-polluting source of transportation.

Emergency Vehicle Access

Opponents to the bicycle lanes raised concern that the Proposed Project would create potential safety impacts (and associated liability to the City) due to increased congestion and reduced road capacity hindering emergency vehicle access and prompt response times.

Emergency vehicles are able to use sirens to move traffic out of the path of travel. Buffered bicycle lanes could also provide sufficient space for cars to pull over into, in order to yield right-of-way to emergency response vehicles. In general emergency vehicles will be able to use center left turn lanes. In addition, bicycle lanes would provide either space for vehicles to move out of the way or in some cases emergency vehicles would be able to use the bike lane and buffer as an emergency vehicle lane. Substantial impacts to emergency services are not anticipated.

Traffic Study Error

Some comments stated concerns with suspiciously high traffic delay numbers reported in the Draft EIR for the intersections of Sierra Villa Drive and Eagle Rock Boulevard

along Colorado Boulevard, and requested that the traffic counts be investigated and revised if needed.

LADOT staff looked into this and found irregularities with the traffic count data. New counts were conducted and showed that the potential impact at the two intersection of Sierra Villa Dr. and Eagle Rock Boulevard were overestimated in the Draft EIR. The revised analysis found that the Proposed Project would result in the following two intersections on Colorado Boulevard:

- 50.7 instead of a 94.7 second delay during the AM Peak Hour at Sierra Villa Drive
- 350.9 instead of a 471.5 second delay during the PM Peak Hour at Sierra Villa Drive
- 55.7 instead of a 111.4 second delay during the AM Peak Hour at Eagle Rock Boulevard
- 115.5 instead of a 453 second delay during the PM Peak Hour at Eagle Rock Boulevard

Revisions to both Table 4.5-2 on Page 4.5-9 and Table 4.5-5 on Page 4.5-19 of the Draft EIR is included in the attached Corrections.

Demonstration Trial Lane Closure

LADOT, DCP and CD 14 received a several requests during the extended public outreach to assess the feasibility of temporarily closing one lane on Colorado Boulevard for one week in order to simulate the traffic impacts of the Proposed Project.

Trial lane closures are not part of the Proposed Project. Granting or denying the request is at the discretion of LADOT in exercising their judgment of encouraging orderly and safe operation of the roadway. In addition, LADOT will need to assess the task relative to resource and staffing constraints.

Additional Outreach, Surveys and Petitions

LADOT and DCP attended Neighborhood Council meetings as well as community meetings sponsored by the CD 14 Council Office in order to further engage the public, and receive feedback, on the Proposed Project. Comments raised at the meetings largely repeated feedback received at the hearing and written comments received during the comment period and addressed throughout this staff report.

City staff have received subsequent email comments during this extended outreach that included 85 comments, in support of various elements of the proposed Project, and 32 letters in opposition to the removal of travel lanes. Organizations that submitted support letters for bicycle lanes along Colorado Boulevard include the Eagle Rock Neighborhood Council, the LACBC, Take Back the Boulevard, and over 40 local business owners in Eagle Rock. Organizations that submitted opposition letters include several local business owners along Colorado Boulevard. Some of the support and opposition from these groups seem to also overlap with the respective support for, or concern with, bicycle lanes along N. Figueroa Street.

In addition, a number of surveys and petitions have been submitted to council offices, as well as DCP and LADOT staff, that both support and oppose the Proposed Project. Estimating the total amount of support or opposition is difficult to gauge by the petitions

submitted, due to repeating names on multiple petitions, as well as individuals signing both support and opposing petitions. This latter ambiguity could stem from the nature of the petition question since the responses could be influenced depending on how the question is framed. In addition, some reasons that were raised for opposing the Proposed Project included the loss of parking, though the Proposed Project does not include the loss of parking spaces. This could indicate a lack of understanding of the Proposed Project as a basis for the opposition.

SUMMARY AND RECOMMENDATION

Based on the completion of the publication of the traffic and safety assessment in the Draft EIR, the inclusion of mitigation measures and the holding of a public hearing, the DCP recommends that LADOT find that the City is in compliance with Section 21080.20.5 of the PRC, and therefore determine that the Proposed Project is not subject to Division 13 of the PRC, also known as CEQA. Based on the conclusions of the traffic and safety assessment in the Draft EIR, the safety improvement benefits of building out the bicycle network, and the role the Proposed Project plays in implementing the goals and policies of the 2010 Bicycle Plan, the DCP recommends that LADOT act to move forward with the implementation of the 8.1 miles of new bicycle lanes in the Northeast Los Angeles area.

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ATTACHMENT 1. SUMMARY OF COMMENTS AND RESPONSES

The following master comments, and their corresponding master responses, are derived from the comments (verbal comments from the public hearings as well as written comments) received in response to the circulation of the Draft EIR, which included the transportation and safety analysis. Since the Draft EIR evaluated over 40 miles of proposed bicycle lanes included in the First Year of the First Five Year Implementation Strategy, not all of the comments were directly related to the Proposed Project. However, general comments have been included here in addition to comments that address the Proposed Project in Northeast Los Angeles. Comments that specifically address the other bicycle lanes in the First Year of the First Five Year Implementation Strategy will be addressed in subsequent Department of City Planning (DCP) Staff Recommendation Reports or the Final EIR for the Figueroa Streetscape Project.

The following Master Comments (in bold) have been distilled from a number of similar comments. A list of some of the specific comments related to each master comment is included in Appendix 1.

Master Comment 1a: Expressions of support to bicycle lanes in general and/or specific projects.

Master Response 1a: A number of letters were received that supported bicycle lanes in general or supported specific segments.

A number of comments addressed the unsafe conditions along existing streets and the need for safe bicycle lanes to ensure that bicycles have access to paths of travel (north-south and east-west as well as connections to existing bicycle routes and future transit stations) in the City. Some people indicated a preference for protected bicycle lanes in order to maximize safety and therefore increase bicycle use of the routes. Many supporters cited improvements in bicycle safety as a major reason to implement the lanes. Also people noted that increasing bicycle connectivity and increasing accessibility to area uses is anticipated to increase bicycle ridership.

Several people noted that decreasing vehicular capacity could, over time, lead to different travel behavior (working from home, living closer to work) thus reducing congestion.

Some supporters drew parallels to other cities to indicate what was possible. Supporters predicted that an improved bicycle network, coupled with slower traffic, will increase access to and patronage of local businesses. Supporters of bike lanes pointed to reduced traffic speed as a side benefit.

Master Comment 1b: Expressions of opposition to bicycle lanes in general and/or specific projects.

Master Response 1b: A number of letters were received that opposed bicycle lanes in general or opposed specific segments.

The Draft EIR/traffic and safety analysis indicated significant impacts along a number of streets as a result of the project. A number of comments agreed with the conclusions of the Draft EIR, with respect to the significance of the travel impacts, and further indicated that such impacts were unacceptable. Opponents expressed that comparing Los Angeles to other more bicycle friendly cities was flawed in not highlighting the differences that set Los Angeles apart. They also predicted that travel lane reduction will harm access to local businesses.

Master Comment 2: Outreach efforts were inadequate to reach all interested parties.

Master Response 2: The City complied with notification requirements of Section 21080.20.5 (b)(2) of the Public Resource Code (PRC) through publishing a notice in a newspaper of general circulation. The Notice of Availability and Public Hearing was published in the Los Angeles Times on January 17, 2013. In addition to the legal requirements of the PRC, notification and outreach process for the Proposed Project also included a variety of lists used to distribute notices of the Hearings and Draft EIR availability. The distribution included neighborhood councils in affected areas, a list of public agencies, email contacts of interested

parties whom have submitted inquiry by email on the 2010 Bicycle Plan and implementation process, and organizations that have submitted letters in the scoping process.

A Notice of Public Hearing was distributed on December 13, 2012. The notice was distributed two months in advance of the public hearing in order to give neighborhoods councils sufficient time to agendize the item for an upcoming meeting and to perform any outreach and input they deemed sufficient in advance of the Hearing. The Notice of Availability of the Traffic and Safety Assessment was released on January 17, 2013, in advance of the Public Hearing on the Proposed Project, and included both a physical and email address where comments could be sent to. The Notice of Availability was distributed to the same parties that were sent a hearing notice.

City staff believes this process of notification to be comprehensive and that all interested parties had an opportunity to be notified through these channels. This is in addition to the information provided by LADOT staff at various neighborhood council and community forums, as well as noticing on the LADOT Bike Blog and the Department of City Planning website. All comments expressing opinion about the Proposed Project have been forwarded to the respective Council offices.

Master Comment 3: The use of a CEQA Exemption is not the appropriate environmental documentation. The City failed to comply with the eligibility requirements of PRC Section 21080.20.5. The 2010 Bicycle Plan fails to comply with Section 891.2 of the California Streets and Highways Code.

Master Response 3: AB 2245 (PRC Section 21080.20.5) allows for a Statutory Exemption from CEQA. The exemption provides that CEQA does not apply to restriping of streets in urban areas. Restriping in urban areas, consistent with a bicycle plan, is statutorily exempt from CEQA. A Statutory Exemption from CEQA contrasts with a Categorical Exemption. (For example, CEQA Section 15304 Minor Alterations to Land, subsection (h) allows bicycle lanes in existing rights of way.) A Categorical Exemption is for a class of projects that is generally found to have less than significant impacts. However, a Categorical Exemption is not allowed in circumstances where a significant impact could occur. Therefore, AB 2245 was proposed to streamline the processing of bicycle lanes that had the potential to result in significant adverse impacts.

The comment alleges that the implementation of bicycle lanes identified in the 2010 Bicycle Plan are not eligible for the Exemption under AB 2245 because: implementation of the 2010 Bicycle Plan requires a General Plan Amendment that includes a major revision to the Circulation Element, the eligibility requirements of PRC Section 2180.20.5 were not appropriately satisfied and the 2010 Bicycle Plan itself does not comply with Section 891.2 of the Streets and Highways Code.

As stated in the DCP Staff Recommendation Report, the City complied with the provisions of PRC Section 21080.20.5 by assessing the traffic and safety assessments of the Proposed Project and including the analysis in a Draft EIR. The Draft EIR was made available on January 17, 2013, nearly one month in advance of the Public Hearing of the Proposed Project held on February 13, 2013. See Master Response 2 for notification of availability of Draft EIR and the Public Hearing.

The commenter implies that the 2010 Bicycle Plan is not in compliance with several provisions of Section 891.2 of the Streets and Highways Code. The provisions include existing number of bicycle commuters and the estimated increase of bicycle commuters from plan implementation; a map of land uses, existing and proposed land uses; a map of existing and proposed transport and parking facilities; a map of clothing storage facilities; a description of bicycle safety and education programs; a description of citizen and community involvement; a description of plan coordination with local and regional plans, a description of projects proposed in the plan; and a description of past expenditures for bicycle facilities future financial needs for bicycle safety improvements.

The commenter seems to confuse the proposed action under review, which is an administrative action (implementation of the 2010 Bicycle Plan), with a legislative action (amendment to the 2010 Bicycle Plan). The Proposed Project implements the 2010 Bicycle Plan. The Proposed Project is included in the 2010

Bicycle Plan as part of the Backbone Bikeways Network. Implementation of the 2010 Bicycle Plan is an administrative decision by LADOT, and a General Plan Amendment (a legislative action) is not required to implement the 2010 Bicycle Plan. The proposed action does not require the re-adoption of the 2010 Bicycle Plan, as the 2010 Bicycle Plan was adopted by resolution by the City Council on March 1st, 2011. Compliance with Section 891.2 of the Streets and Highway Code is not related to the action to implement the 2010 Bicycle Plan, but was required when the 2010 Bicycle Plan was adopted. Furthermore, Los Angeles County Metropolitan Transportation Authority (Metro) issued a memo to the Department of City Planning on March 16, 2012 that found that the 2010 Bicycle Plan was in compliance with Section 891.2 of the Streets and Highway Code. The compliance pursuant to Section 891.2 of the Streets and Highway Code can be found in 2010 Bicycle Plan Appendix C: Bicycle Transportation Account (BTA) Checklist.

The commentor states the need to complete a Final EIR but fails to demonstrate why the completion of a Final EIR is necessary.

Master Comment 4: The Draft EIR addresses bicycle lanes in a piecemeal manner, which is not permitted by CEQA.

Master Response 4: The comment asserts that the Draft EIR conducted a piecemeal analysis and that the analysis should encompass the entire 2010 Bicycle Plan.

The 2010 Bicycle Plan was reviewed in one environmental document (Mitigated Negative Declaration (MND), ENV-2009-2650-MND, published on October 8, 2010). At the time the MND was prepared, the basic design configurations for many bikeways were undetermined. The bikeways established in the 2010 Bicycle Plan, that did not require either the removal of a mixed flow travel lane, or the removal of a mixed-flow travel lane that did not result in a significant travel delay impact were cleared through the MND. On Page 114 of the 2010 Bicycle Plan it was determined that, once a design was identified, bicycle lanes that required the removal of a travel lane(s), that could potentially result in a travel delay impact, would require further analysis. The process established by AB 2245, exempts the implementation of bicycle lanes from CEQA. In order to qualify for the exemption, AB 2245requires that a traffic and safety analysis be conducted, that mitigation measures be incorporated, and a public hearing be held.

The analysis of all potential bikeways in the 2010 Bicycle Plan is not possible at this time because the specific facility type and the implementation phase of many of the bikeways in the 2010 Bicycle Plan is remote and speculative. Once a bikeway is prioritized for implementation, and a facility type is known, the City determines if subsequent review is required based on the potential for traffic and safety impacts. The City shall comply with all requirements of Section 21080.20.5 of the PRC (AB 2245) once it is determined that subsequent analysis is necessary.

Master Comment 5: The proposed bicycle lanes are inconsistent with the Framework Element of the General Plan that includes a requirement that all streets designated as bicycle routes have a curb lane wide enough to accommodate bicycle traffic.

Master Response 5: As described on page 4.3-16 of the Draft EIR, the 2010 Bicycle Plan was approved and adopted by the City as part of the Transportation Element of the City's General Plan, which is the overall guiding plan element that establishes the City's transportation policy. The 2010 Bicycle Plan (Bicycle Plan) identifies a 1,684 mile bikeway system that includes City streets and establishes policies and programs intended to make bike riding safe on City streets, consistent with General Plan Framework Policy 5.3.4. The Proposed Project is identified in the Bicycle Plan as part of the City's Backbone Network, and therefore, would be consistent with the goals and objectives of the Bicycle Plan, the Transportation Element, and the General Plan Framework.

The Proposed Project includes installing bicycle lanes that could result in the loss of at least one travel lane. The loss of travel lane is necessary to provide a curb lane wide enough to accommodate bicycle traffic along designated bikeways, and for consistency with the policies of the Bicycle Plan and the City's General Plan Framework. The buffered bicycle lanes are included to provide additional safety for bicyclists and conform

to standards in the Technical Design Handbook, as well as the California Manual of Uniform Traffic Control Devices (MUTCD).

The comment alleges that the Draft EIR picks and chooses from many objectives and policies of the Framework Element and misses important ones critical to an objective EIR but fails to provide evidence to support how the Proposed Project would conflict with the Framework Element, or how such conflict would contribute to a significant impact. The Comment identified a number of General Plan Framework policies and programs; however, many of these programs do not relate to the Proposed Project or to bicycle lanes in general. For this reason, they are not referenced in the Draft EIR. For example, program P4 calls for the development of Transportation Improvement and Mitigation Plans (TIMPs) for the purpose of expediting the approval of new development applications and streamline traffic mitigation procedures. The Bicycle Plan is not the appropriate mechanism to set policy for development review applications, as TIMPs are developed as the Community Plans are updated. However, one of the elements of the TIMP to be considered is a bicycle access plan for targeted growth areas. Rather than conflicting with the program as implicated by the comment, the Proposed Project substantially improves bicycle access in a high-targeted growth area of the Central City, South and Southeast Community Plan areas.

The absence of these General Plan Framework policies in the Draft EIR that are unrelated to implementation of the Proposed Project does not influence the objectiveness of the Draft EIR. However, some of the Framework Element programs mentioned in the comment letter are considered as mitigation measures when implementing bicycle lanes on City streets, such as neighborhood traffic management strategies.

Master Comment 6: The Proposed Project is not consistent with applicable Community Plans.

Master Response 6: The Draft EIR analyzes the impacts of implementation of just 39.5 miles of the 1,684 miles of bicycle lanes identified in the 2010 Bicycle Plan. The City's updated community plans, which are in various stages of planning and approval, are just one of several opportunities available to evaluate the implementation of proposed bicycle lanes identified in the 2010 Bicycle Plan. However, the completion of a Community Plan update is not necessary to implement bicycle lanes in the Community Plan area. Proposed bikeways that potentially result in significant impacts are subject to the exemption process established by AB 2245, and can be cleared through subsequent traffic and safety assessments provided they meet the requirements of AB 2245.

As described on pages 4.3-16 and 4.3-17 of the Draft EIR, the Proposed Project are generally consistent with applicable plans and policies, and are consistent with applicable Community Plan objectives and policies related to the promotion of pedestrian and bicycle use. However, due to the loss of traffic lanes, the Proposed Project is inconsistent with objectives and policies related to traffic volumes and flow, though the loss of traffic capacity would not create unsafe conditions or substantially affect the aesthetic character of the community. The Draft EIR concluded on page 4.3-16, that because the Proposed Project would be consistent with applicable plans and policies encouraging alternative transportation, sustainability, and in general responds to State and regional sustainability requirements, impacts related to land use plan and policy consistency would be less than significant. Policies referenced in the comments primarily relate to physical development and do not apply to the Proposed Project. Applicable objectives and policies of the community plans are identified in Table 4.3-2 of the Draft EIR. The intended positive effect of the Proposed Project on communities is also discussed in Section 3.2, Project Objectives, and Section 3.3 Project Benefits, of the Draft EIR.

Master Comment 7: The proposed bicycle lanes represent a major revision to the Circulation Element. The Proposed Project does not address how the 2010 Bicycle Plan also plans for bicycling as a recreation use, as well as a transportation use. A full EIR is required.

Master Response 7: The commenter seems to confuse the proposed action under review, which is an administrative action (implementation of the 2010 Bicycle Plan), and not a legislative action (amendment to the 2010 Bicycle Plan). The Proposed Project implements the 2010 Bicycle Plan. The Proposed Project is included in the 2010 Bicycle Plan as part of the Backbone Bikeways Network. The 2010 Bicycle Plan was

adopted by the City Council March 1st, 2011 by resolution. Implementation of the 2010 Bicycle Plan is an administrative decision by LADOT, and a revision of the Circulation Element (a legislative action) is not required to implement the 2010 Bicycle Plan. See Master Response 4 for the environmental clearance process of the 2010 Bicycle Plan.

In response to the comment that the Bicycle Plan does not link the Circulation Element to the Land Use Element, the 2010 Bicycle Plan considered land use as a factor in designating the City's bikeways. The implementation of bikeways in the 2010 Bicycle Plan is influenced by a number of factors including increased bicycle access to destinations along commercial corridors.

The comment does not substantiate how the Proposed Project would benefit people choosing to bicycle for recreation purposes over mobility purposes or how increasing recreational riding would contribute to an environmental impact.

See also Master Responses 10 (regarding alternate streets), 30 (regarding use of bicycle lanes) and 32 (regarding mode shifts).

Master Comment 8: The Proposed project is not consistent with the Complete Streets Act.

Master Response 8: AB 1358 requires that upon any substantive revision of the circulation element of a general plan, the circulation element should be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roadways, and highways. The adopted 2010 Bicycle Plan is a component of the City's Transportation Element (which itself is in the process of being revised). The 2010 Bicycle Plan plans for the provision of a bicycle network that is safe and convenient. The implementation of the 2010 Bicycle Plan does not preclude the creation of a balanced multimodal transportation network; rather it is just one component of such a network and supports the use of other forms of transportation, consistent with the intent of AB 1358. Contrary to one commenter's statement, the 2010 Bicycle Plan does not make changes to any community plans. However, as the community plans are updated they will incorporate the bikeway system identified in the 2010 Bicycle Plan.

The Proposed Project implements a small portion of the bicycle network identified in the 2010 Bicycle Plan. An objective of the Proposed Project is to encourage multi-modal travel by creating a better environment for bicyclists, pedestrians, and transit users while accommodating vehicles. Page 3-2 of the Draft EIR lists the objectives of the Proposed Project, all of which are consistent with the intent of AB 1358. Implementation of the Proposed Project would not preclude the use of vehicles for those who do not wish to walk or bicycle.

The commentor states the need to complete a Final EIR and show how this plan complies with AB 1358, but fails to indicate either the lack of compliance with AB 1358, or the significant impact would occur as a result. See Master Response 3.

Master Comment 9: The Bicycle Plan discriminates against people with disabilities.

Master Response 9: Consistent with a number of planning strategies in the State, Region and City, the Bicycle Plan addresses plans to improve one mode of transportation, but not to the exclusion of other travel modes. The City will continue to plan for travel modes that are accessible to the disabled. The 2010 Bicycle Plan does not discriminate against people with disabilities.

Master Comment 10: Commenters identified a number of alternative streets other than those analyzed in the Draft EIR and other programs to promote bicycling in the City, in lieu of installing bicycle lanes.

Master Response 10: Some of the streets that were offered as alternatives lack feasibility because they do not provide a complete connection along a corridor as compared to the Proposed Project, while other proposed alternatives do not connect bicycle riders to their preferred destinations. Some of the proposed alternative streets also lack the necessary width to install bicycle lanes while also maintaining one travel lane in each direction and on-street parking.

Some of the comments suggested programs that promote car pooling, transit, and greater reliance on sidewalks for bicycling, as a means to full fill some of the project objectives, instead of installing bicycle lanes. Car pooling and changes to transit are separate projects that are simultaneously being pursued in the City; they are not alternatives to the bicycle lanes proposed. Use of sidewalks by bicycles - though legal in the City of Los Angeles – is not encouraged; studies show that bicycle riding on sidewalks presents more risks to all users, as compared to riding a bicycle in the street. The City is also encouraging increased pedestrian activity and therefor separating bicycles from pedestrians is beneficial.

Some of the comments sought greater investment in bicycle facilities such as cycle ways and cycle tracks beyond standard and buffered bicycle lanes. Elevated cycleways and protected bicycle lanes throughout the system are currently infeasible, in the short-term, due to insufficient funding and road allocation needs. An elevated bicycle facility would likely lack the added safety benefits achieved by reducing the number of travel lanes and effectively lowering the design speed. The Department of City Planning is currently undergoing an update to the Mobility Element that currently includes the identification of a low-stress bicycle network throughout the City. This will likely include the proposal for more protected bicycle lanes also known as cycle tracks. However, this is a long-term goal and implementation of standard or buffered bicycle lanes is more feasible option in the short-term. A buffered bicycle lane is proposed for most of the length along Colorado Boulevard and the segment of N. Figueroa Street between York Boulevard and San Fernando Road.

Master Comment 11: The Draft EIR does not provide accurate information regarding the monetary value of injuries and fatalities.

Master Response 11: The monetary value of various injuries, by type of collisions, were included as a footnote 28 on Page 4.5-33 of the Draft EIR, The information was included to demonstrate the safety benefits, in monetary terms, in reducing the amount of bicycle and pedestrian related collisions if bicycle lanes were installed. A response to inquiry with the Transportation Injury Mapping System (TIMS) staff verified that the original monetary values were underreported.[1] The follow text corrects what was provided in the Draft EIR.

~~Injury types and their respective monetary values used are Fatality ($140,301), Severe Injury ($7,560), Other Visible Injury ($2,765), and Complaint of Pain ($1,572).~~ The values used for the safety benefits and methodology used in the benefit-cost calculator are on page 82 of the CalTrans Local Roadway Safety Manual (April 2012). Bicycle lanes in general reduce bicycle/pedestrian collisions by 35%..

Crash Severity **	**Crash Cost ***
Fatality (K)	$4,008,900
Severe/Disabling Injury (A)	$216,000
Evident Injury – Other Visible (B)	$79,000
Possible Injury – Complaint of Pain (C)	$44,900
Property Damage Only (O)	$7,400
* The letters in parenthesis (K, A, B, C and O) refer to the KABCO scale; it is commonly used by law enforcement agencies in their crash reporting efforts and is further documented in the HSM. ** Highway Safety Manual (HSM), First Edition, 2010.	

Master Comment 12: The heat map showing bicycle safety is too general.

Master Response 12: The heat map (Figure 4.5-1) is intended to show citywide trends regarding bicycle collisions. Project level bicycle collision data is available; see Master Responses 10 and 17.

[1] *Email correspondence with the Transportation Injury Mapping System (TIMS) staff on January 22, 2013.*

Master Comment 13: The Draft EIR analyses traffic impacts and does not address LOS of transit or other modes of transportation.

Master Response 13: LADOT is studying alternative methodologies to identify impacts to street throughput including all modes of transportation. Until an alternative methodology is adopted, and the types of data needed to undergo any new methodology are identified and collected, the existing thresholds and LADOT methodology for traffic studies are the only available methodologies at this time. However, the Draft EIR verifies that the bicycle-transit-only lane would reduce the transit travel time, within this segment, during the peak hours of travel demand.

Master Comment 14: The EIR should address impacts to Native American Resources.

Master Response 14: The Proposed Project is the installation of bicycle lanes, and does not involve the disturbance of previously undisturbed ground. The project is limited to paint associated with bicycle lanes. Therefore no disturbance of Native American resources is anticipated.

Master Comment 15: The Draft EIR should identify standards for bike lanes (e.g., width and distance from curb or parked cars).

Master Response 15: The standard dimensions for standard Class II Bicycle lanes include a 5-foot minimum bike lane width next to a curb or parking lane. The minimum distance of a parking lane is 7-foot when a 5-foot bike lane is adjacent to it. A minimum 10.5-foot traffic lane is required next to a bicycle lane. The Proposed Project includes buffered bicycle lanes that exceed the 5-foot minimum bicycle lane dimensions.

Master Comment 16: The City should collect more traffic and bicycle count data as well as economic data in order to be able to evaluate project success and any unintended consequences (impacts to businesses, adjacent streets). Additionally data regarding collisions and delay should be made available.

Master Response 16: LADOT maintains an inventory of traffic counts, at specific locations, around the City. Complete counts, across even small areas of the City, including neighborhoods, would require effort beyond the staffing capacity commensurate with the installation of bicycle lanes. The City continues to reach out to third party organizations to conduct bicycle counts and has applied for funding to install bicycle counters in strategic locations. However, these efforts are either contingent on funding or timing constraints that may be infeasible to occur during specific project implementation.

LADOT and DCP currently monitors bicycle crash data from the Statewide Integrated Traffic Records System (SWITRS) as implementation of Program 3.2.4 A of the 2010 Bicycle Plan. The SWITRS data is collected by California Highway Patrol and is available through the Transportation Injury Mapping System (TMS) established by Safe Transportation Research and Education Center (SafeTREC) at the University of California, Berkeley. The monitoring of bicycle and pedestrian collision data is currently reviewed by staff prior to bicycle lane installation and will be reviewed over the long term to determine the safety benefits of bicycle facilities.

The comment refers to a Bikes Belong grant supported study conducted by the Los Angeles County Bicycle Coalition (LACBC) that evaluated the economic impacts of a similar installation of bicycle lanes along York Boulevard that required a removal of a travel lane (road-diet).[2] While this type of evaluation was not part of a formal City program, Policy 3.2.6 of the 2010 Bicycle Plan seeks to establish a means to measure the economic impact on commercial corridors resulting in bikeway improvements. However, implementation of this program is contingent on program funding. A part of such program could include collecting data on business taxes and property sales records for the given period to monitor patterns in response to bikeway improvements.

[2] McCormick, Cullin. (2012) York Boulevard., Economic of a Road Diet. UCLA Luskin School of Public Affairs

See Master Response 28 related to neighborhood intrusion impacts.

Master Comment 17: The cost benefit analysis does not address the impacts/costs of added travel delay.

Master Response 17: Socioeconomic issues are not required by CEQA unless they lead to physical environmental impacts. The cited benefit/cost results were included as a footnote for informational purposes as part of the safety impact discussion. The benefit/cost analysis methodology used was established for allocating funding under CalTrans' implementation of the federal Highway Safety Improvement Program (HSIP). Since the programmatic goals of the HSIP are to increase safety of the roadways, economic costs of travel delay are not considered as part of the evaluation. In order for bicycle lanes to be eligible for the AB 2245 exemption, a safety impact discussion is required, but the calculation of economic costs due to travel delay is not.

Master Comment 18: The Draft EIR should cite safety, injury and fatality studies.

Master Response 18: The following Table A shows bicycle/ pedestrian collision injuries and fatalities data for 10 years for the Proposed Project street segment.

TABLE A: BICYCLE PEDESTRIAN COLLISION INJURIES AND FATALITIES ON PROJECT ROUTES

Street	Bike/Ped Collision Injuries Total 10 Years (2001-2010)	Bike/Ped Collision Fatalities 10 Years (2001-2010)	Route Miles	Collision Injury/Fatality rate per mile per year
N. Figueroa St.	169	9	5.1	3.49
Colorado Blvd.	50	2	3	1.73

Source: Data compiled using the Transportation Injury Mapping System developed by the University of California, Berkeley. http://www.tims.berkeley.edu/

Master Comment 19: The Bicycle Plan should be coordinated with other Citywide plans and projects.

Master Response 19: Implementation of the 2010 Bicycle Plan is a citywide planning effort that is being undertaken jointly by DCP and LADOT. Their efforts are coordinated with other planning efforts being undertaken at the same time including the Mobility Element Update, the Westside Mobility Study, new, community plans, specific plans, etc. However, as noted below, detailed analysis of bicycle lanes can only be undertaken when the bicycle lanes /street cross sections have been designed. Therefore, it is not possible to fully coordinate all planning efforts at the same time as individual bicycle lanes may be designed after completion of some of the planning efforts mentioned.

Master Comment 20: What is the source of funding for the projects?

Master Response 20: The Proposed Project is funded by Measure R local return.

Master Comment 21: The EIR does not provide sufficient mitigation to reduce project impacts.

Master Response 21: Some comment letters allege the inadequacy of mitigation measures, but failed to provide measures that would be as effective at reducing impacts while achieving the project objectives. Mitigation Measure T1, the adjustment to signal timing and Mitigation Measure T2 implementation of citywide Transportation Demand Management (TDM) measures are feasible means to both move traffic within the system capacity as efficiently as possible, while providing programmatic support to reduce the overall demand of driving. Other potential mitigation, such as road widening are either too costly in terms of additional right-of-way acquisition or compromise the travel demand and safety benefits achieved by the Proposed Project.

Mitigation Measure T3 was incorporated in the Draft EIR to address potential neighborhood intrusion

impacts due to the roadway reconfigurations proposed as part of the First Year of the Five Year Implementation Strategy. Neither Colorado Boulevard nor N. Figueroa Street were identified in the Draft EIR as areas where implementation of bike lanes could potentially result in diversion of traffic to adjacent residential streets. Therefore, Mitigation Measure T3 is not required for the Proposed Project.

See also Master Response 28 related to traffic diversion.

Page 4.5-32 of the EIR acknowledges, that the Proposed Project would result in a potentially significant impact related to transit operations along N. Figueroa Street and Colorado Boulevard due to increases in transit travel time and transit delay. Mitigation Measure T1, the adjustment to signal timing would help to reduce transit delay in addition to general traffic delay. There were no other mitigation measures identified by the comments that would further reduce impacts to transit delay. As the comment fails to include measures that would deem as adequate, no further response is necessary.

Master Comment 22: The cumulative analysis is inadequate.

Master Response 22: CEQA Guidelines [Section 15130(d)] allow for two methods for reviewing cumulative development:

- A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or
- A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include: a general plan, regional transportation plan, or greenhouse gas reduction plan. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program. Any such planning document shall be referenced and made available to the public at a location specified by the lead agency.

If approved, the various bicycle projects, included in the First Year of the Five Year Implementation Strategy are anticipated to be in place within one year. Many of the known cumulative projects are anticipated to be completed over a number of years. In addition projects not yet known will occur throughout the City. For that reason the City chose to use a plan based analysis of cumulative conditions. The SCAG projections take in to account City growth projections, large known projects are typically included in the SCAG modeling data.

It is City policy to not include mitigation measures from related projects in the traffic analysis of proposed projects due to uncertainty in the related project approval and implementation phase.

Bike lanes as proposed on these streets would not adversely impact emergency responders. See Master Response 26 below.

Master Comment 23: The Draft EIR uses count data for each intersection based on only one day. Use of a single day to assess traffic impacts could underestimate traffic impacts.

Master Response 23: Performing a one-day count conforms to the LADOT Traffic Study Policies and Procedures and is representative of a typical day. The LADOT Traffic Study Policies and Procedures establish that all traffic counts should generally be taken on Tuesdays through Thursdays during non-Summer months, when local schools are in session, on days of good weather, and should avoid being taken on weeks with a holiday.[3] Minor fluctuations occur from day to day and over seasons. One day counts are adequate for the analysis.

[3] LADOT, Traffic Study Policies and Procedures. May 2013. Page 6

Master Comment 24: The Draft EIR analyzes the peak hours of 3 pm to 6 pm, which may not be enough to capture all peak hours. The peak hours in the City of Los Angeles last well past 6 pm.

Master Response 24: Peak hour in the City of Los Angeles occurs during the peak period between 3 PM and 6 PM. That is not to say that increased traffic does not extend beyond these hours just that the peak traffic occurs during these periods. In many areas of the City as noted by a number of commenters commuter traffic extends to 7:30 PM and beyond, but the peak activity occurs between 3 PM and 6 PM. For the purposes of the analysis, the peak period is used to demonstrate the worst-case scenario of traffic impacts. The LOS impacts would not change if the peak period were to be extended, since LOS of non-peak period is not evaluated.

Master Comment 25: The Draft EIR does not account for special events or seasonal traffic.

Master Response 25: Background traffic during special events, etc. is typically much lower than the background traffic during the peak period, and past traffic counts at these locations have confirmed this. Even with event traffic, overall maximum intersection delay occurs during the peak period (3-6 PM). Traffic in the immediate vicinity of special events may be worse outside peak hours, but is not easily captured because of inherent variability in types of events.

Master Comment 26: The removal of travel lanes would impact emergency vehicle and response times.

Master Response 26: Emergency vehicles are able to use sirens to move traffic out of the path of travel. Buffered bicycle lanes could also provide sufficient space for cars to pull over into in order to yield right of way to emergency response vehicles. In general, emergency vehicles are also able to use center left turn lanes. In addition, the bicycle lanes would provide space for vehicles to pull over to allow passage of emergency vehicles, or in some cases, emergency vehicles could use the bicycle lane and buffer as an emergency vehicle lane. Substantial impacts to emergency services are not anticipated.

Master Comment 27: The Draft EIR averages delay and impacts and does not take into account further delay that could occur between intersections, or at left turns.

Master Response 27: The Draft EIR Traffic analysis evaluates impacts based on the peak hour. So to the extent that peak hour impacts are analyzed (as opposed to peak 15 minutes), impacts are averaged. Significant impacts are not expected at intersections with minor streets because, even with the loss of lanes, the amount of delay at such intersections is not anticipated to exceed the LADOT significance thresholds. Some negligible delay at minor intersections could be experienced, in addition to the delay at major intersections.

The Proposed Project is not expected to increase left turn movement above current conditions. As the Proposed Project is in final design stage, LADOT are exploring ways to improve left turns by adding them to locations where they do not currently exist, extending the refuge areas and adding additional markings. Left turns are not expected to be further delayed by the Proposed Project.

Master Comment 28: The bicycle lanes could result in reasonably foreseeable diversion of traffic to adjacent streets resulting in additional impacts.

Master Response 28: The methodology used to evaluate traffic impacts is conservative in that no diversion of traffic or changes to travel behavior was assumed in order to estimate maximum delay. The Draft EIR found potential for some movement of traffic to parallel streets to occur along some streets included in the First Year of the Five Year Implementation Strategy, and Mitigation Measure T3 was incorporated to address potential neighborhood intrusion impacts. However, neither Colorado Boulevard nor N. Figueroa Street were identified in the Draft EIR as areas where implementation of bike lanes could potentially result in diversion of traffic due to the general absence of parallel adjacent residential streets. Therefore, Mitigation Measure T3 is not required for the Proposed Project.

Master Comment 29: Striping of streets is identified in AB 2245 but installation of permanent curbs to provide "Protected" bike lanes is not just "striping".

Master Response 29: This comment was related to the S. Figueroa Corridor Streetscape Project. As the Proposed Project does not include this type of facility, no response is necessary. Nonetheless, in part to address the lack of clarity in the regulation, a Final EIR is being prepared for the Figueroa Streetscape Project.

Master Comment 30: The demand for new bicycle lanes is questioned. New bicycle lanes are perceived to be underutilized.

Master Response 30: The use of bicycle lanes is anticipated to increase as greater connectivity is achieved. The utility of any one bicycle segment is directly related to how it connects to a greater system, how it facilitates trip to desired destinations, and the level of comfort experienced along the entire trip length. As the bicycle network is expanded, to connect people to desired destinations, and increases overall perceptions of safety and comfort of bicycling, it is anticipated that bicycle use will grow substantially. According to SCAG estimates, bicycling could amount to as high as 16 percent of all trips throughout the region by 2035 based on current increases in projected ridership trends.[4] However, SCAG anticipates conservatively that even if bicycle ridership is not sustained at the current levels of growth, bicycle trips could still represent at least 8 percent of all trips throughout the region in 2035.[5] The percentage could exceed 8 percent contingent on the comprehensiveness of the bicycle network, services and facilities and the opportunity cost to other travel modes such as gas prices.

Master Comment 31: Increased delay will lead to increased idling of cars which will lead to increased vehicle emissions. In addition cars loss of parking will lead to cars circling and looking for parking, which will increase emissions. These emissions were not studied.

Master Response 31: For purposes of identifying a conservative estimate of vehicle travel delay, the Draft EIR assumes that vehicle traffic volumes on the various affected roadway segments will remain unchanged even where there would be a reduction in travel lanes and roadway to accommodate bicycle lanes. The pollutant most affected by traffic delay is carbon monoxide (CO). Typically, CO emissions increases as vehicle speed decreases between the range of 10 miles per hour (mph) and 25 mph, and increase further as vehicles speed decreases to 2.5 mph idling speed, while CO emissions decrease as vehicle speed decreases above 25 miles per hour.[6] Where capacity is reduced there could be an incremental reduction in vehicle speeds along the affected street segments and there could be a localized incremental increase in CO emissions. In some cases, where capacity is reduced, the number of vehicles passing through an intersection during the peak hour could decrease, which could lead to the peak period being extended, as well as modest increases in CO emissions. Localized concentrations of CO could occur where large amounts of traffic operate under heavily congested conditions and if vehicles are left idling for a substantial period of time. Many roadway segments affected by the proposed projects are already congested and operate at or near capacity during peak hour periods and any incremental change in traffic volumes or vehicle idling emissions would not be significant.

Other factors taken in to account in the analysis are as follows: 1) the proposed project would affect capacity of approximately 0.5 percent of the roadway miles in the City of Los Angeles (32.5 miles out of 6,500) and 2) the existing ambient CO levels are extremely low within the Los Angeles Air Basin. The one-hour concentration is typically 3 ppm and the 8-hour concentration is typically 2 ppm according to monitoring data for the SCAQMD monitoring station located in downtown Los Angeles. The Air Basin, is designated a maintenance area for CO which means that that both State and federal air quality standards are satisfied. There are no air quality CO hot spots within the basin as a whole or the City of Los Angeles in particular.

[4] SCAG 2012-2035 Regional Transportation Plan (RTP), page 42
[5] Based on correspondence with SCAG modeling staff, Naresh Amatya on March 18, 2013
[6] Federal Highway Administration (FHWA) website, http://www.fhwa.dot.gov/resourcecenter/teams/airquality/tinja.cfm, accessed on May 15, 2013

To trigger an impact, CO emissions along any roadway segment affected by the project, would be have to increase by almost 7 times in the peak hour or by four times in over an 8-hour period. Because of the low ambient CO condition, even where average street segment speeds could be reduced to almost zero the resulting CO emissions would only increase by two times. Under the most extreme circumstance, the change in emission levels would not be high enough to cause an exceedance of the CO air quality standard, and therefore would not result in a significant impact.

The Proposed Project would not result in in the removal of parking spaces. Parking losses were identified as being associated with some of the other proposed bicycle lanes included in the First Year of the First Five year Implementation Strategy, and the impact discussion is elaborated in the DCP Staff Recommendation Reports for those projects.

Master Comment 32: The Draft EIR does not take into account the decrease in vehicle trips anticipated to occur as more people use transit and bicycles and other modes.

Master Response 32: The impacts of converting vehicle trips to bicycle trips is not fully taken in to account in the traffic modeling. The SCAG modeling projections use conservative (i.e. low) assumptions regarding the number of trips anticipated to occur via bicycle (an average of 8% region-wide in 2035[7], with an upper limit of 2/3 of all trips under 3 miles and ½ of all trips under 5 miles occurring by bicycle).[8] Similarly, changes in behavior that are anticipated to occur over time (e.g. increased telecommuting, people living closer to their jobs, changing routes due to congestion) are not fully taken in to account in the SCAG future year modeling. Because changes in mode share and behaviors are uncertain, LADOT takes a conservative approach to modeling. The analysis is considered conservative (worst case) because it does not assume that changes that have occurred in other cities will happen in Los Angeles. The City is currently evaluating different methods for measuring impacts to all modes of travel as a part of the Mobility Element Update.

Master Comment 33: The Draft EIR does not adequately assess impacts to residents and businesses in the area of the Proposed Project.

Master Response 33: The Draft EIR identifies the potential physical environmental impacts of the proposed bicycle lanes. CEQA does not address socio-economic concerns unless they lead to physical environmental impacts. As described on page 4.5-33 of the Draft EIR, LADOT conducted a cost-benefit analysis to calculate the potential safety benefits expected from the proposed bicycle lanes. This cost-benefit analysis did not contemplate the cost of added delays. However, traffic circulation impacts described in Section 4.5 of the Draft EIR were evaluated based on the additional average vehicle delay that the Proposed Project would cause under Existing Plus Project conditions and Future Cumulative (2035) conditions. This is considered a conservative analysis because the Existing Plus Project conditions do not take into account decreases in traffic caused by the shift to alternative transportation modes and the SCAG Regional Travel Demand Model used to forecast future year traffic conditions assumes a relatively modest (8%) share of all trips to be bicycle trips (Draft EIR page 4.5-17).

While the Draft EIR evaluated the impact of delays in the context of traffic, the Draft EIR did not analyze the impact of delays on retail sales and property values. As described on page 4.5-27 of the Draft EIR, parking deficits are considered to be social effects unless they lead to blight and physical impacts. In accordance with CEQA Guidelines Section 15131, economic effects of a project need not be included in an EIR, and the economic effects of a project should not be treated as a significant effect on the environment. For this reason, an analysis of the economic effects of the proposed project was not included in the Draft EIR. The Proposed Project would not result in in the removal of parking spaces. Parking losses were identified as being associated with some of the other proposed bicycle lanes included in the First Year of the First Five year Implementation Strategy, and the impact discussion is elaborated in the DCP Staff Recommendation Reports for those projects.

7 Based on correspondence with SCAG modeling staff, Naresh Amatya on March 18, 2013
[8] SCAG 2012-2035 Regional Transportation Plan (RTP), page 42

As indicated in Table 2-1 in the Summary, the Draft EIR determined that the proposed project would result in significant and unavoidable impacts related to intersection level of service and transit. All other impacts were determined to be less-than-significant after mitigation.

The proposed projects are intended to facilitate increased bicycle trips as a percentage of total trips and encourage multi-modal travel. With implementation of the Proposed Project, bicycle trips are anticipated to increase as a percentage of total trips resulting in a reduction in vehicle trips, a stated objective of the proposed project.

The Draft EIR found potential for some movement of traffic to parallel streets to occur along some streets included in the First Year of the Five Year Implementation Strategy, and Mitigation Measure T3 was incorporated to address potential neighborhood intrusion impacts. However, neither Colorado Boulevard nor N. Figueroa Street were identified in the Draft EIR as areas where implementation of bike lanes could potentially result in diversion of traffic due to the general absence of parallel adjacent residential streets. Therefore, Mitigation Measure T3 in the Draft EIR is not required for the Proposed Project.
The Proposed Project is not anticipated to permanently prevent or disrupt access to surrounding land uses, such as businesses located along bicycle routes, identified by the commenter. A Bikes Belong grant supported study, conducted by the Los Angeles County Bicycle Coalition (LACBC), evaluated the economic impacts of a similar installation of bicycle lanes along York Boulevard that required a removal of a travel lane (road-diet).[9] The study compiled data on business taxes, business closures and openings and property sales records and found no significant difference to economic activity along York Boulevard after the 'road diet was implemented. The study also conducted survey data that found that most merchants did not feel that bicycle lanes hurt their business, while a large percentage of merchant and customers were hesitant to support bicycle lanes that remove a travel lane. However, it also demonstrated the merchants on average, underestimated the percentage of their costumers that arrive at the business by means other than car. See Master Response 15 related to collection of economic data.

Master Comment 34: Congestion could discourage transit use and impose costs on transit operators.

Master Response 34: On a few of the streets in the First Year of the Five Year Implementation Strategy that include bicycle lanes with heavy bus volumes, LADOT is evaluating or proceeding with bus-bike lanes, which should improve bus performance. Page 4.5-32 of the EIR acknowledges, that the Proposed Project would result in a potentially significant impact related to transit operations along N. Figueroa Street and Colorado Boulevard due to increases in transit travel time and transit delay. Mitigation Measure T1, the adjustment to signal timing would help to reduce transit delay in addition to general traffic delay. There were no other mitigation measures identified by the comments that would further reduce impacts to transit delay. Transit would continue to be impacted on streets where there would be no transit lane, and therefore impacts to transit would be significant and unavoidable.

LADOT is working with Metro on routes where bus performance may be potentially impacted. In general, bus-bike lanes would enhance bus performance. In order to foster coordination to respond to potential short and long-term impacts to transit service, Metro Bus Operations Control Special Events Coordinator and Metro Service Planning & Scheduling shall be contacted in advance of installation of bicycle lanes.

Socio-economic issues such as impacts to the costs of bus operations are not addressed by PRC Section 21080.20.5, or CEQA unless they lead to physical environmental impacts. See also Master Response 33. See Corrections and Additions for page 4.5-10. Page 4.5-10 the description of Metro services is revised as follows:

> **Los Angeles County Metropolitan Transportation Authority (Metro)**. The Metro provides bus, light rail and subway services within the Los Angeles County. There are ~~six~~ four Metro light rail lines (i.e., Blue, ~~Red,~~ Green, Gold, ~~Purple,~~ and Expo), two subway lines (i.e., Red and Purple), and two ~~subway~~ bus lines (i.e., Orange and Silver) operating in exclusive right-of-ways.

[9] McCormick, Cullin. (2012) York Boulevard., Economic of a Road Diet. UCLA Luskin School of Public Affairs

Master Comment 35: The Draft EIR does not adequately address safety.

Master Response 35: The Draft EIR generally discusses bicycle safety in the City of Los Angeles. As with any mode of travel there are inherent risks, riding a bicycles is no exception. The purpose of the safety analysis is to evaluate any unusual hazards within a given project. LADOT designs bicycle lanes to maximize safety to the extent feasible.. In general, studies indicate that the addition of bicycle lanes make roadways safer for all road users.

The Draft EIR addresses the safety benefits of bicycle lanes in two locations. A general discussion of bicycle lane safety benefits is included on pages 3-5 and 3-6 as well as 4.5-33 of the Draft EIR. Figure 4.5-1 is included that demonstrates the location of proposed bicycle lanes relative to the density of bicycle collisions. The discussion is included as follows.

The perception of safety is one of the most important factors in choosing bicycle as a travel mode. In 2001, bicyclists in the United States had 12 times more fatalities than drivers per mile traveled.[10] The addition of bicycle lanes on arterial streets is shown to reduce the risk of serious injuries by about 30 percent, while the upgrade to fully protected bicycle lanes or cycle tracks reduce the risk of injury by 90 percent.[11] Of 68 cities across California with the highest per capita pedestrian and bicycle collisions, per capita injury rates to pedestrians and bicyclists are shown to fall precipitously revealing a non-linear relationship of bicycle safety as the level of bicycling increases.[12] This study showed as much as an eightfold variation of collisions (expressed as a percentage of those that bike or walk to work) in comparing low and high bicycling cities. [13]

The underlying reason for this pattern is that motorists drive slower when bicyclists and pedestrians are visible either in number or frequency, and drive faster when few pedestrians and bicyclists are present, resulting in higher overall travel speeds. This effect of modified driving behavior is consistent with other research, focused on 24 California cities, that shows that higher bicycling rates among the population generally lowers the risk of fatal crashes for all road users.[14] Comparing these low versus high bicycling communities, there was a ten-fold reduction in fatality rate for motorists, an eleven-fold reduction in fatality rates for pedestrians, and an almost fifty-fold reduction in fatality rateso for bicyclists.[15]

Injury risks to bicyclists in New York City dropped by 72 percent between 2000 and 2010 and declined by nearly 30 percent two consecutive years in a row (2008, and 2009) when the City was the most active in building bicycle lanes.[16] A 2000 safety study of 682 bicycle-motor vehicle crashes in Phoenix found that 95 percent of crashes occurred on streets with no bicycle facilities and merely 2 percent occurred in bicycle lanes.[17]

See Corrections and Additions for page 4.5-37, revised Footnote 28.

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[10] Pucher, J., and L. Dijkstra. 2003. Promoting Safe Walking and Cycling to Improve Public Health: Lessons from the Netherlands and Germany. American Journal of Public Health, Vol. 93, No. 9, 2003, pp. 1509–1516.

[11] Kay Teschke et al. 2012. Route Infrastructure and the Risk of Injuries to Bicyclists: A Case-Crossover Study. American Journal of Public Health.

[12] Jacobsen, P.L. 2003. Safety in Numbers: More Walkers and Bicyclists, Safety Walking and Bicycling. Injury Prevention 9~3!:205–209.

[13] Jacobsen, P.L. 2003. Safety in Numbers: More Walkers and Bicyclists, Safety Walking and Bicycling. Injury Prevention 9~3!:205–209.

[14] Marshall, Wesley E., N. W. Garrick. 2011. Evidence on Why Bike-Friendly Cities Are Safer For All Road Users. Environmental Practice 13 (1) March 2011

[15] Ibid.

[16] Adam Arvidson, 2012. *Power to the Pedalers.* Planning May/June 2012, pp. 12 through pp.17.

[17] Ibid.

Metro Comment 36: Shared bus bicycle lanes can have a negative impact on transit.

Master Response 36: This comment was related to the Bicycle-Transit–Only Lanes included as part of the First Year of the First Five Year Implementation Strategy. As the Proposed Project does not include this type of facility, no response is necessary.

Master Comment 37: How can slowing traffic be beneficial?

Master Response 37: The comment seems to indicate that the goals to alleviate congestion conflicts with goals to improve roadway safety. LADOT is responsible for working toward both goals. LAMC Section 89.01 states that the General Manager of LADOT shall consider public safety, convenience, and expediting the movement of traffic as determining factors when installing lane markings in addition to other design parameters of City streets.

Congestion is mostly experienced at peak travel times where roadway capacity reaches its limits to move traffic in a free-flowing manner. However, substantial safety risks are posed, especially during the off-peak period where driving above the speed limit is more common. Driving behavior is largely influenced by roadway design, and poses disproportionate risks to more vulnerable road users such as pedestrians and bicyclists. The City lacks the ability to lower speed-limits in commercial arterials, which are determined by Section 2B.13 of the California Manual of Uniform Traffic Control Devices (MUTCD) based on the 85th-percentile speed that statistically represents one standard deviation above the average speed. Therefore, traffic calming measures such as narrowing lane widths, reducing travel lanes and introducing elements such as speed bumps and landscape medians often used to reduce vehicle travel speed.

As stated in the Draft EIR, pedestrian collision with a vehicle traveling at 20 miles per hour results in a 5 percent pedestrian fatality, and pedestrian fatalities increase to 40, 80 and 100 percent when the vehicle speed increases to 30, 40 and 50 miles per hour respectively.[18] Bicycle lanes, when accompanied by travel lane reduction, can help reduce over-all vehicle speed.[19] This would be most beneficial in the off-peak periods where the risks of pedestrian fatalities are higher due to higher travel speeds.

Master Comment 38: The project could lead to increased traffic and therefore increased noise in residential areas.

Master Response 38: A doubling of traffic volumes would be required to increase noise levels by an audible 3 dBA. The Draft EIR presents a conservative analysis (in terms of identifying total delay) that assumes all cars will stay on the street with the bike lane. The Draft EIR found potential for some movement of traffic to parallel streets to occur along some streets included in the First Year of the Five Year Implementation Strategy. However, neither Colorado Boulevard nor N. Figueroa Street were identified in the Draft EIR as areas where implementation of bike lanes could potentially result in diversion of traffic due to the general absence of parallel adjacent residential streets. Even if there was a potential for traffic diversion, it would not be anticipated to result in a doubling of traffic volumes on adjacent parallel streets. On streets where existing volumes are very low, should traffic volumes double, the resulting noise level would still be within the acceptable range for residential uses. For these reasons, the Draft EIR concludes that the proposed project would result in a less-than-significant impact related to mobile noise due to traffic diversion.

[18] U. S. Department of Transportation National Highway Traffic Safety Administration. 1999. Literature Review on Vehicle Travel Speeds and Pedestrian Injuries. DOT HS 809 021

[19] Federal Highway Administration (FHWA) website. http://www.fhwa.dot.gov/publications/research/safety/10053/index.cfm, accessed on November 19, 2012

Master Comment 39: Bicycle trips should count against the Congestion Management Program (CMP) traffic count thresholds.

Master Response 39: The CMP Guidelines were established a number of years ago. Bicycle trips are not included in the criteria for determining when to analyze an intersection. Bicycle trips have different characteristics as compared to vehicle trips and are not at the present time accounted for in the CMP guidance.

Master Comment 40: Increased bicycle trips should be quantified.

Master Response 40: The Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) assumes an 8% bicycle mode share of all trips, i.e. that 8% of all trips will be by bicycle in 2035[20] (with an upper limit of 2/3 of all trips under 3 miles and ½ of all trips under 5 miles occurring by bicycle). However, this a conservative (low) assumption for purposes of capturing traffic and air quality impacts as part of the RTP process. The RTP Active Transportation Appendix (page 42 of the Active Transportation Appendix of the 2012—2035 RTP) indicates the following:

> … active transportation has grown dramatically in recent years. This trend is expected to continue into the foreseeable future aided by several factors. First, dramatic increase in the bicycle network, … will result in improved access to bicycle network for the Region's residents by more than 50 percent. Second, more compact mixed use urban forms in the future will be much more conducive to biking and walking. Third, better coordination with other modes, primarily transit, will become an incentive for some to switch to biking or walking. Most importantly, a significant change in the culture that values a healthy lifestyle, bikeability and walkability will become a greater impetus in promoting active transportation as a viable means of accessing opportunities. Given this context and survey data that supports dramatic increase in bicycling and walking mode shares in recent years, it is reasonable to assume this trend will continue into the future. For example, according to the National Household Travel Survey (NHTS) data, bicycle mode share increased for all trips from 0.8 percent in 2000 to over 1.7 percent in 2009. This is an increase of almost 9 percent on an annualized basis. The share of walk trips for all trip purposes increased by approximately 6 percent on an annualized basis during the same period.
>
> So, if we assumed annualized increase of 9 percent in mode share of bicycle trips for all trips, the potential bicycle mode share could be as high as 4.4 percent in 2020 and as high as 16 percent in 2035. However, it is somewhat unrealistic to assume that 9 percent growth rate could be sustained over such a long period of time. On the other hand, given the significant investments proposed for active transportation and the current trends, it is reasonable to assume that at least 2/3 of all trips shorter than 3 miles or half of all trips that are 5 miles or less could be converted to active transportation[21] by 2035.
>
> … based on NHTS-CA Survey for all trips, bicycling and walking mode share for all trips are approximately 1.7 percent and 19.24 percent respectively for2009. This represents a little over 50 percent of all trips less than 3 miles. Assuming 2/3 of all trips under 3 miles or half of all trips under 5 miles as the upper limit of Active Transportation mode share in 2035, relative increase (from the base year of 2008) in bicycling and walking mode shares can be estimated as 1.7 percent and 3.1 percent in 2020, and 3.9 percent and 6.3 percent in 2035. Relative reduction in VMT resulting from these mode shifts are estimated at approximately 7.8 million miles and 20.4 million miles for 2020 and 2035 respectively.[22]

Skate boarders do not count as bicycle lane users.

Master Comment 41: The proposed bicycle lanes would adversely impact Environmental Justice.

Master Response 41: CEQA does not address environmental justice issues. See Master 34 above related to potential impacts to transit.

[20] Based on correspondence with SCAG modeling staff, Naresh Amatya on March 18, 2013
[21] Active Transportation includes bicycle and pedestrian trips.
[22] SCAG 2012-2035 Regional Transportation Plan (RTP), page 42

Master Comment 42: The Proposed Project would result in severe traffic impacts.

Master Response 42: As indicated in the traffic and safety analysis in the Draft EIR, implementation of the proposed bicycle lanes is anticipated to result in a number of significant adverse traffic impacts throughout the area. The Proposed Project would result in a significant travel delay impact at three intersections during both the AM and PM peak periods, along N. Figueroa Street and three intersections, during both the AM and PM peak periods along Colorado Boulevard.

This specific additional in delay (and total delay) in seconds of the following intersections for the respective peak period along N. Figueroa St. are:

Colorado Boulevard: 30.5 (56.2) AM peak period and 19.5 (40.1) PM peak period*
York Boulevard: 41.5 (66.4) AM peak period and 17.3 (46.1) PM peak period
Avenue 26: 95.4 (149.5) AM peak period and 6.8 (45.7) PM peak period

This specific additional in delay (and total delay) in seconds of the following intersections for the respective peak period along Colorado Boulevard are:

Sierra Villa Drive: 27.2 (50.7) AM peak period and 203.6 (350.9) PM peak period
Eagle Rock Boulevard: 22.4 (55.7) AM peak period and 64.3 (115.5) PM peak period
N. Figueroa St. 30.5 (56.2) AM peak period and 19.5 (40.1) PM peak period*

* The N. Figueroa Street and Colorado Boulevard intersection overlap between the two corridors.

The Draft EIR does not account for shifts in travel behavior overtime to bicycling. However, studies show that bicycle ridership increases in response to the availability of facilities, especially if they add to the comfort of the experience and connect people to their destinations. Such benefits are long term in nature and are considered as a number of transportation solutions to provide greater level of access to City residents while reducing impacts on the environment.

Additional Specific Comments and Responses

1. **There should be no "exceptions" on Figueroa. If all but the Avenue 26 intersection is striped, it would create a dangerous conflict point that countless cyclists will have to travel through.**

   The comment that there should be full implementation of bicycle lanes on N. Figueroa Street is noted. See Master Response 35 for discussion on the safety benefits of installing bicycle lanes. The comment will be forward to the decision maker, in this case the General Manager of LADOT, whose final decision will depend on a number of factors that include improvements to safety of both bicycle and vehicular travel.

2. **Favor signal-timing on N. Figueroa St. to get the speeds of cars down to make safer for everyone.**

   LADOT shall make adjustments to signal timing once the bicycle lanes are installed as part of Mitigation Measure T1 to facilitate safe and efficient traffic movement for all roadway users.

3. **Signal timing on N. Figueroa should coincide with peak am (southbound) and pm (northbound) to get cars moving.**

   As indicated in Mitigation Measure T1 (see page 2-5 and 4.5-42 of the Draft EIR), signal timing will be optimized for efficient traffic flow.

4. **The City should finish striping the bike lane on Eagle Rock Blvd. from Westdale to Colorado.**

   LADOT is currently reviewing the completion of striping of Eagle Rock Boulevard.

5. **When there is an accident or closure on the 134, cars divert onto Colorado -- gridlock can extend two miles. Much worse with one fewer lane for the cars.**

   The comment is noted and will be taken into consideration by the decision maker, in this case the General Manager of LADOT. The analysis in the Draft EIR found that the Proposed Project would result in significant impacts to travel delay at three of the six intersections evaluated along Colorado Boulevard during both the AM and PM peak periods. This would also likely include times when there are accidents and closures along the SR-134. However, travel delay along Colorado Boulevard aggravated by accidents and closures along the SR-134 would be infrequent and short-term in duration.

6. **N. Figueroa is the only truck route up Arroyo Seco through Northeast LA, narrowing to one lane would impact trucks.**

   Trucks would experience the same impacts as motor vehicle traffic though would not be disproportionately impacted. Trucks above 6,000 pounds are restricted from the State Route (SR)-110 between U.S. Route 101 and the SR-110 terminus in Pasadena. Truck movements through this area would be continued to be facilitated by the I-5, SR-2 and SR-134. Although N. Figueroa Street is not an officially designated truck route, some truck operations may use the N. Figueroa Street to access local businesses. However, these commercial delivery operators have greater flexibility in altering the delivery schedules to off-peak periods to avoid impacts to travel times.

7. **Was the hilly nature of Northeast LA taken in to account?**

   The Proposed Project has been demonstrated to have strong support amongst bicycle riders that currently use Colorado Boulevard and N. Figueroa Street, which was a factor in selecting these roads for priority implementation. The bicycle lanes provide an added benefit in hilly terrain by separating slow-climbing bicyclists from faster moving vehicular traffic.

8. **Figueroa between San Fernando Road and Colorado Blvd., is already impacted by Gold Line crossings that back up traffic on Figueroa up to Avenue 59 or for six blocks to Roselawn during rush hours when a train passes – at least every 7 mins. With one lane, traffic will back up to Avenue 57 which is where people enter and exit the freeway. What will be done to help traffic flow?**

   Comment noted. The comment refers to northbound traffic back up where the Gold Line crosses N. Figueroa Street just northeast of the Avenue 61 intersection. LADOT determined to maintain two northbound lanes while eliminating one southbound lane at this location based on the traffic counts that demonstrated that northbound movement carries higher traffic volumes during the PM peak period. Given that two northbound lanes will be maintained at this location, the condition of traffic back up cited by the comment will not be aggravated by the Proposed Project.

9. **Commenter opposes the alternative to maintain three travel lanes on Colorado Boulevard between Sierra Villa and eagle Rock Blvd. 1) Traffic calming is needed. Traffic speed and the difficulty for pedestrians crossing the street are seen as serious problems. 2) The project would not create a bikeway comfortable for all bicyclists. Colorado Blvd. is curving and sloped in this location. Bicyclists may go too fast. A minimum width bicycle lane squeezed between narrow parking lane and narrow travel lane would not be comfortable for less confident bicyclists.**

   The Draft EIR assessed the safety of the Proposed Project (see page 3-5 and 3-6 as well as 4.5-33 of the Draft EIR) and found that the effective reduction in travel lanes would help to reduce travel speeds, and thereby installing bicycle lanes would result in a direct safety benefit. The addition of bicycle lanes on arterial streets is shown to reduce the risk of serious injuries by about 30 percent.[23] According to

[23] Kay Teschke et al. 2012. Route Infrastructure and the Risk of Injuries to Bicyclists: A Case-Crossover Study. American Journal of Public Health.

studies in other Californian cities, per capita injury rates to pedestrians and bicyclists are shown to fall as the level of bicycling increases,[24] and increase in bicycling rates through the country is seen as a direct response to investment in bicycle supporting infrastructure.[25] While some percentage of bicyclists may observe poor judgment in disregarding traffic rules, reasons for this may stem from current road conditions that attract a higher amount of risk prone bicyclists. Adding low stress facilities such as buffered bicycle lanes have a greater potential to increase a more risk adverse bicycle riding population that would likely have greater observance of traffic rules. The commenter's opinion will be forwarded to the decision maker for consideration in the final project design.

10. **Erroneous data in the EIR for two intersections on Colorado (Sierra Villa and Eagle Rock).**

    LADOT staff looked into this and found irregularities with the traffic count data. New counts were conducted, which showed that the potential impact at the two intersections of Sierra Villa Dr. and Eagle Rock Boulevard were overestimated in the Draft EIR. See Corrections and Additions Section for pages 4.5-10 and 4.5-21 with respect o changes to date for these intersections.

Webinar General Comments and Responses

1. **The graphs are from 2007: do you have anything more recent?**

   The graphs the comment is referring to were illustrative and not data related to the current project.

2. **What is the percentage of City, County and DOT employees that use public transportation or bike to work? Is there a plan to make it mandatory?**

   The percentage of mode shift of bicycle commuting of City employees is recorded as part of the Annual Transportation Survey. However, since responses only allow one commute mode response, bicycle commuting is assumed to be underreported since other travel modes such as transit are often involved. In any event, reporting on this survey is not relevant to the analysis of the Draft EIR since it captures only a small portion of the City's workforce. The City does not have the ability to make a given transportation mode mandatory. However, bicycle commuting is encouraged through campaigns such as Bike to Work week.

3. **Where do you get 20% of trips are bike/ped? What is the criteria for a "trip." This figure seems very high?**

   Bicycle/pedestrian trips are 21% of all trips in the SCAG region according to the 2009 National Household Travel Survey.

4. **If you are correct about increased bike ridership, will bikes be licensed as all other forms of road transportation vehicles are?**

   Bicycle licensing is not a City of Los Angeles policy and is not related to the environmental analysis.

5. **On the issue of enforcement: What percent of collisions are hit and run? What has LAPD been doing to enforce hit and run collisions, especially those that hit more vulnerable pedestrians and cyclists?**

   Data regarding hit and run accidents is not immediately available and is not relevant to the analysis in the EIR.

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[24] Jacobsen, P.L. 2003. Safety in Numbers: More Walkers and Bicyclists, Safety Walking and Bicycling. Injury Prevention 9~3!:205–209.

[25] Dill, Jennifer and Theresa Carr. 2003. Bicycle Commuting and Facilities in Major Cities: If You Build Them, Commuters Will Use Them. Transportation Research Record 1828:116-123

6. Travel time impacts to bicyclists ignored. Topography matters to bicyclists.

The2010 Bicycle Plan attempts to provide connectivity to all areas of the City even those with hills. But the 2010 Bicycle Plan also seeks to provide connections that allow bicyclists to optimize their routes, using terrain as one of many factors. The bicycle lanes provide an added benefit in hilly terrain by separating slow-climbing bicyclists from faster moving vehicular traffic.

Appendix 1: Comments that are summarized by Master Comments

Comments Summarized by Master Comment 2:

- Homeowners/landowners don't seem to know about project, bike supporters do but not others. Who received notice of webinar?
- Have not solicited enough community input.
- Legal requirement to adequately involve the public.
- Notice did not provide e-mail or physical address to send comments.
- Notice to a complete set of stakeholders in the impacted area.
- Should have had posting in areas where disruption of traffic or parking could occur.
- Circulation period poorly publicized. Comment period should be extended.
- Forward comments to Mayor and Council.
- Several times during the City staff presentation, reference was made to input that had been received from the "Bicycle Coalition". However, there was no reference to or evidence of input that had been received from the several homeowners associations in the area or from the many business owners/operators. A greater effort to incorporate information from those sources should be made as the consideration of the feasibility of the proposed bicycle lanes progresses.

Comments Summarized by Master Comment 3:

- The Bike Plan does not meet the requirements of AB 2245. The City of Los Angeles incorrectly claimed that AB 2245 allows it to circumvent CEQA and not prepare or certify a Final EIR. While AB 2245 does exempt Class 2 bicycle lanes from the EIR process in certain circumstances (compliance with section 891.2 of the California Streets and Highways code) the 2010 Bicycle Plan falls short of compliance on several points.
- Paragraph PRC 21080.20.5(b)(1) requires a partial environmental impact report (EIR) prepared per CEQA procedures (because this mandate is part of CEQA), including public comment periods.
- Only after magnitude of impacts assessed in partial Draft EIR in paragraph (b)(1) can City do the public hearings in Section (b)(2) in light of findings in (b)(1). The steps were not fulfilled to bring to second step.
- Further AB 2245 requires compliance with California Streets and Highways Code Section 891.2 and that Section is located in Article 3, California Bicycle Transportation Act (890-894.2). Article 3 states that "it is the intent of the Legislature, in enacting this article, to establish a bicycle transportation system. It is the further intent of the Legislature that this transportation system shall be designed and developed to achieve the functional commuting needs of the employee, student, business person, and shopper as the foremost consideration in route selection, to have the physical safety of the bicyclist and bicyclist's property as a major planning component, and to have the capacity to accommodate bicyclists of all ages and skills."
- From the Streets and Highway Code 891.2. A city or county may prepare a bicycle transportation plan, which shall include, but not be limited to, the following elements:

  (a) The estimated number of existing bicycle commuters in the plan area and the estimated increase in the number of bicycle commuters resulting from implementation of the plan.
  (b) A map and description of existing and proposed land use and settlement patterns which shall include, but not be limited to, locations of residential neighborhoods, schools, shopping centers, public buildings, and major employment centers.

  There were no maps as described. Not showing residential communities or commercial districts does not show the full impact of Bike lanes on the surrounding communities. 20 of the 35 Community plans are impacted by the Bike Plan. Maps that show existing and proposed Land user and settlement patterns can be found in Bicycle plans of other California Cities and are necessary to

evaluate impacts that the loss of parking and motorized travel lanes would have on businesses and adjacent Residential communities. This is a serious issue.

(c) A map and description of existing and proposed bikeways.

(d) A map and description of existing and proposed end-of-trip bicycle parking facilities. These shall include, but not be limited to, parking at schools, shopping centers, public buildings, and major employment centers.

(e) A map and description of existing and proposed bicycle transport and parking facilities for connections with and use of other transportation modes. These shall include, but not be limited to, parking facilities at transit stops, rail and transit terminals, ferry docks and landings, park and ride lots, and provisions for transporting bicyclists and bicycles on transit or rail vehicles or ferry vessels.

(f) A map and description of existing and proposed facilities for changing and storing clothes and equipment. These shall include, but not be limited to, locker, restroom, and shower facilities near bicycle parking facilities.

(g) A description of bicycle safety and education programs conducted in the area included within the plan, efforts by the law enforcement agency having primary traffic law enforcement responsibility in the area to enforce provisions of the Vehicle Code pertaining to bicycle operation, and the resulting effect on accidents involving bicyclists.

Safety. The Bike plan mentions Safety but this is the only reference in the DEIR. “Support local advocacy groups and bicycle-related businesses to provide bicycle-safety curricula to the general public”. This is not a clear Commitment to allocate specific funds for Safety. Without funds for safety to protect the public and the bicycle community there will be unmitigated serious impacts.

Education. The Bike plan mentions education but funds are sketchy. It says Metro will allocate 2% of bike plan funds to bike safety and Education programs. This does not rise to the level of a clear Commitment to allocate specific funds for education. Without funds to educate the public and the bicycle community there will be unmitigated serious impacts.

Law Enforcement. Specific amounts of funding and agencies involved must be made prior to approving this Plan or DEIR. The general public has no confidence that there will be enforcement of the vehicle code for bicyclists.

DEIR too vague where it says “Education and encouragement programs would further mitigate congestion by increasing bicycle mode share”. Mitigating congestion without proper funds attached will not produce useful results.

(h) A description of the extent of citizen and community involvement in development of the plan, including, but not limited to, letters of support.

(i) A description of how the bicycle transportation plan has been coordinated and is consistent with other local or regional transportation, air quality, or energy conservation plans, including, but not limited to, programs that provide incentives for bicycle commuting.

(j) A description of the projects proposed in the plan and a listing of their priorities for implementation.

(k) A description of past expenditures for bicycle facilities and future financial needs for projects that improve safety and convenience for bicycle commuters in the plan area.

There is no description of Past Expenditures in the 2010 Bicycle Plan. DEIR lists the requirement but still there is no list of past expenditures. Future PLAN lists costs in future $235-427 Million, though couldn’t find any in Draft EIR.

Comments Summarized by Master Comment 5:

- The Framework Element was last updated in 2002 filed a statement of overriding considerations for the Bicycle plan which this DEIR and the Bicycle Plan do not address.
- In addition to the Framework Element, other mitigation measures recommended by the Final EIR include:
  - Ensure that all City Streets have a curb lane wide enough to accommodate bicycle traffic; and

- Require that all new developments install in all garages electric plugs that can recharge electric vehicles. Pursuant to Section 21081 of the Public Resources Code. the City finds the first mitigation measure to be physically and economically infeasible without extensive condemnation of private property or purchase of right-of-way. A “built out” city cannot ensure that all the streets will be rebuilt with the required width for bicycle routes. Also, there are streets where any kind of bicycling would be unsafe. Therefore, the City will not adopt this mitigation measure and will adopt a substitute measure as follows: "Ensure that all City streets designated in the Bicycle Plan as bicycle routes have a curb lane wide enough to accommodate bicycle traffic .

- Curb lane wide enough. Wide curb lane - A 14 foot (or greater) wide outside lane adjacent to the curb of a roadway, that provides space for bicyclists to ride next to (to the right of) motor vehicles. Also referred to as a “wide outside lane”. If adjacent to parking, 22 feet in width may also be considered a wide curb lane.
- DEIR picks and chooses from many objectives and policies of the Framework Element and misses important ones critical to an objective EIR. The comment refers to Policy 5.3.4 – Streets. Identify commuter and recreational bicycle routes that link major destinations within the City, and establish and implement standards to maintain their safety and security. The comment also includes Program 3 and Program 4. Program 3 directs the City to formulate and periodically update a citywide Transportation Element that address multiple measures that include VMT reduction measures, access to employment centers and non-motorized transportation systems, and a host of other transportation related measures in the context of the regional transportation system. Program 4 directs the City to develop Transportation Improvement and Mitigation Plans (TIMPs) that will expedite approvals of new development applications and streamline traffic mitigation procedures. The program mentions vehicle, transit and bicycle access plans, and neighborhood traffic management as an example of a number of measures to be included in TIMPs.

Comments Summarized by Master Comment 6:

- Out of the 20 Community plans the 2010 Bike Plan will impact, only two (Hollywood and Boyle Heights) have a policy listed. The rest make do with Objectives which are much easier to manipulate rather than Policies which Implement the Community Plans. Community plans do a whole lot more than provide the necessary focus on bicyclists at the Community level. Pick any Community plan (below we quote from the West LA Community plan) and look at what it says about the Purpose of the Community plan.
- Role of the Community Plan. The Community Plans are intended to promote an arrangement of land uses, streets and services which will encourage and contribute to the economic, social and physical health, safety, welfare and convenience of the people who live and work in the community.
- The 2010 Bicycle Plan lays out the process for implementing the Bike Plan by updating the Community Plans when it states the following: The City is currently in the process of updating all 35 Community Plans that together comprise the Land Use Element of the General Plan. As each Community Plan is updated future bicycle lanes in that planning area will be analyzed with regard to potential environmental impacts. Currently future bicycle lanes are being analyzed for the Sylmar, Granada Hills, Southeast, South, San Pedro, and West Adams/Leimert Park Community Plans.
- That is not being done and as a result: This Bicycle plan is inconsistent with the Community Plans.

Comments Summarized by Master Comment 7:

- Shall be designed and developed to achieve the Functional commuting needs. The Bike Plan relies heavily on other types of bike riding. Sport, recreation not commuting.

  In enacting the 2010 Bicycle Plan the City of Los Angeles states in Chapter 1, this Chapter articulates the Purpose of the 2010 Plan to increase, improve and enhance bicycling in the City as a safe, healthy, and enjoyable means of transportation and recreation.

  As a matter of fact much of the 2010 Plan deals with Recreational use, fitness, and sport use. The Plan states that in 2000, 0.61% of commuters used a bicycle to commute to work each day and by 2008 that number had risen to 0.90%. That still means that less than 1% of Angelinos use a bicycle to commute to

work on a daily basis. While that number may be laudable it shows that the vast majority of those who will use the Class 2 routes in the plan will not be using it as intended for "the functional commuting needs of the employee, student, business person, and shopper" and as such different criteria must be used as the foremost consideration in route selection. That can only be achieved through a full EIR which takes into consideration the full impact of this plan. A Final EIR would give the community the ability to challenge the assertions in the DEIR and 2010 Plan. It would also give the City time to provide evidence that such programs exist and will have sufficient funding.

- Land Use Element. The Bike Plan does not link the Circulation Element to the Land Use Element (Community Plans).

Comments Summarized by Master Comment 8:

- The standard practice should be to construct complete streets while prioritizing project selection and project funding so that jurisdictions accelerate development of a balanced, multimodal transportation network.
- In Los Angeles the Transportation Element is the Circulation Element. The 1996 Framework Element stated that the Transportation Element supersedes the Circulation Element. That means that the 2010 Bicycle Plan which proposes to make changes to 20 of the 35 Community plans must conform to the Complete Streets Act instead of just planning for Bike Lanes.
- It should be clear that the City of Los Angeles is merely giving lip service to Complete Streets in this update to the Bicycle Plan. At the minimum they must complete a FEIR and show how this plan complies with AB 1358.

Comment Summarized by Master Comment 9:

- The 2010 Bike Plan which is a major update of the Circulation Element discriminates against persons with Disabilities. Recent litigation (CALIF v. City of Los Angeles) against the City of Los Angeles showed that there are over 800,000 persons with Disabilities living within the City of Los Angeles. The 2010 Bike Plan does not address their needs and discriminates against them in favor of persons who can ride Bicycles.

- The 2010 plan makes 2 passing references to persons with disabilities. One was about children (K8) and the other with ADA compliance but there were no programs to help either in this Bicycle Plan. That's unfortunate but the DEIR for the Plan is even worse stating the plan would encourage children, including those with disabilities, to walk and bicycle to school. I suppose those children as well as adults who cannot ride a bicycle or walk have no place in this plan.

Comments Summarized by Master Comment 10:

- Commenters opposed to bicycle lanes along N. Figueroa suggested alternative should be considered that comprise the following streets: Pasadena Avenue to Marmion Way to Avenue 50 to Monet Vista to Avenue 59 to Piedmont Avenue.
- Alternate route leaving N. Figueroa at Marmion Way through Highland Park to Avenue 64, and Avenue 64 as an Alternative route to N. Figueroa
- Review Figueroa Routes to/from Downtown LA from the North via Arroyo Seco via the LA River Path.
- Buffered bike lane on Colorado (as well as Figueroa) for safety.
- Why not have bicycle lanes next to the curb rather than next to the parked cars?
- Look to the past. Elevated California Cycleway was proposed in 1900 from Pasadena to Los Angeles, over a mile was built including night illumination. Attractive alternative to driving. Propose this method for encouraging and promoting bike use not taking auto lanes or parking spaces.
- Car pooling and ride share should be rewarded.
- More buses per stop should be planned.
- Using sidewalks for bicyclists could be an option.

- See the City of Davis, California for a way to create bike lanes which do not impact the flow of traffic or negotiation of businesses and still keep bicyclists safe.

Comments Summarized by Master Comment 16:

- All lanes (or at least one or two key projects) should have pre- and post- (say 5 to 10 years out) studies (like the one on York Blvd. by Cullen McCormick) to measure impact on safety, retail sales, property values, livability, etc.
- Data to be used in future planning to capture actual traffic counts (before and after) on the streets involved and on nearby streets that may experience the resulting cut-through traffic?
- Quantitative data should be provided about current daily volumes of cyclists using the Figueroa Corridor and modeled projections indicating the expected increase in use.

Comments Summarized by Master Comment 21:

- T1 though T-6 are inadequate. Existing measures are inadequate, need a program to identify "before" condition on residential streets.
- The DEIR does not even attempt to identify which impacts, if any, will be mitigated and concludes that the traffic impacts will remain significant and unmitigated.
- Since the City's Neighborhood Traffic Management unit no longer exists and there is no mechanism for the provision of neighborhood mitigations, it is unclear to us as to what a process might be should, for example a bicycle friendly street be identified in our area (or any other area). What LADOT staff will be available to monitor the many local neighborhood streets that will be potentially impacted not only on the Westside, but throughout the program area? If long-range monitoring personnel availability cannot be guaranteed, the credit for the mitigation measure should not be allowed.
- The EIR identifies no mitigation for transit impacts.

Comments Summarized by Master Comment 26:

Increased traffic on Figueroa between San Fernando Road and Colorado Blvd. would lead to lack of accessibility for emergency vehicles, "lawsuit waiting to happen."

Comments Summarized by Master Comment 27:

How would the removal of traffic lanes impact traffic when drivers are making left hand turns on such intersections as Highland View Ave., Vincent Ave., Hermosa Ave., La Roda, Glen Iris, and Floristan?

Comments Summarized by Master Comment 30:

- York Blvd. in Highland Park was recently reduced to a single lane to allow for bicycle lanes. Bike lane is empty. Has LADOT followed up with bike lane utilization and cost/benefit analysis?

Comments Summarized by Master Comment 31:

- In addition, if you take the increases in delay that you have projected, what kinds of impact does that delay have on added air pollution and air quality? Have efforts been made to quantify these impacts?
- EIR acknowledges "idling cars create pollutants which are likely to flow over to neighborhoods." O3, CO, PM10, PM2.5, NO2, SO2 and others have the potential to contribute to increases in asthma, heart disease, cancer and more. Health concern to residents, businesses and bicyclists.
- Even with the increased bike lanes throughout LA, the City estimates that in 2030 bike commuters will only increase from 2,612 to 12,021, as such air quality improvements would be negligible and could actually be made worse with congestion.

Comments Summarized by Master Comment 33:

- The loss of on street parking in many built out communities would deprive those businesses of the only parking they have in close proximity to their businesses and could lead to conditions of BLIGHT on

certain boulevards. Residential communities will suffer the intrusion of motorists looking for a parking space close to their parking destination and increase GREEN HOUSE gasses as motorists circle endlessly looking for a coveted parking spot. This situation is much worse than it should have been due to the flagrant "escheatment" of City special parking funds to fill the coffers of the City general fund.

- Commenter opposes reduction of automobile lanes on Figueroa between San Fernando Road and Colorado Blvd., because traffic impact would negatively impact local businesses.

- Impacts to businesses on Colorado Blvd. Business on York Blvd. has seen a 20% decrease in sales since the bike lane went in, which translates to $11,000 less in sales tax over a four month period. Multiply that by all the businesses.

Comments Summarized by Master Comment 34:

- MTA has operational concerns regarding the removal of any travel lane where bus service operates. The prior removal of a travel lane on Main Street south of Pico Boulevard to install a bike lane has caused PM rush hour backups from Pico Boulevard to 17th Street. This in turn has resulted in bus delays and has increased Metro's operating cost.
- Removal of travel lanes and turning movements will significantly slow bus travel. Quantitative Analysis was not conducted. Cost of bus: $130 per bus per hour to operate. Slowing buses will increase costs. Metro has no additional money for operations. Bus service could be reduced.
- New bicycle lane has caused significant bus queuing on Main Street between 12th and 16th Streets increasing costs and making it harder for Metro to maintain on-time service. Impacts will be worse where travel lanes are reduced to one per direction.
- Several transit corridors with Metro bus service could be impacted by construction of the proposed project. Municipal bus service operators including LADOT, Foothill Transit, and City of Santa Clarita Transit may also be impacted and therefore should be included in construction outreach efforts.
- Description of Metro services contained in Section 4.5, Page 10 of the Draft EIR should include the following corrections:
  1. Metro light rail lines include the Blue, Exposition, Green and Gold Lines. Subway lines consist of the Red and Purple Lines (heavy rail, not light rail). The Orange and Silver Lines operate as Bus Rapid Transit (BRT).

Comments Summarized by Master Comment 35:

- Safety analysis should quantify risks including traffic accidents in or near streets impacted by displaced driving and parking.
- Safety analysis has no substance. Does not quantify the increased number of bicycle trips that would be induced or what would happen when those trips pass through the ill-defined areas of risk. Those trips would not be entirely within bike lanes, a fact not noted or accounted for.
- What about traffic diverted to residential streets where children play.
- What about increased risk of crime from strangers parking and walking in neighborhoods? Increased risk to vulnerable people who have to walk further from parked car to residence. Also, risk of increased auto theft and burglary as people park in more remote areas.
- The City has failed to provide the resources to construct truly safe and separated lanes for those who wish to bike, which is especially important in areas of heavy traffic. It is not reasonable to implement the philosophy of "the slower the safer for bikes and the slower the more likely we will frustrate drivers out of their cars and onto bikes or transit."
- Bicyclists ignore traffic rules (ride through stop lights and signs).

Comments Summarized by Master Comment 36:

MTA has reviewed current research on shared bicycle/bus facilities. A Summary of Design, Policies and Operational Characteristics for Shared Bicycle/Bus Lanes (State of Florida Department of Transportation, July 2012) includes a literature review and case study summary of shared bicycle/bus lanes in the United States as well as internationally. The bus frequency found on this particular segment of Cesar E. Chavez Avenue, is dramatically higher than any of the facilities documented in the study. The highest bus frequency cited in the study was the Stewart Street shared bicycle/bus lane in Seattle, WA, with 77 buses per hour. Every other facility detailed in the study has bus frequencies of 30 per hour or less. The study cites design guidance from Ottawa, Canada that indicates that bicycle and bus facilities should be separated in locations with more than 20 buses per hour. Given that there are more than 120 buses per hour under existing conditions, and this is expected to grow in the near future with the completion of the Division 13 project, Metro has serious concerns over the frequency of bus-bicycle conflicts that would be inherent in bicycles sharing a facility with buses on Cesar E. Chavez Avenue.

Comment Summarized by Master Comment 38:

In some residential areas traffic might double because there is so little traffic there now. Background measurements near affected side streets are missing from the document.

Comment Included as Master Comment 40:

Do skaters and skate boarders count as bike lane users?

Comments Summarized by Master Comment 41:

- Do bicyclists count more than someone delivering goods or driving to work.
- Potential FTA Title VI and Environmental Justice issue due to transit impacts.
- Due to potentially adverse impacts to transit bus service, the EIR should analyze the proposed project's compliance with Title VI and associated Environmental Justice regulations as stipulated by the Federal Transit Administration (FTA).

Comment Summarized by Master Comment 42:

Streets are currently over extended, removal of auto lanes will considerably slow traffic and bike lanes will do little to mitigate impacts.

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ATTACHMENT 2. CORRECTIONS AND ADDITIONS

The following presents Corrections and Additions to the Draft EIR that relate to the Proposed Project. Correction to the Draft EIR that are directly related to other portions of the First Year of the First Five Year Implementation Strategy will be addressed in other DCP Staff Recommendation Reports or the Final EIR for the Figueroa Streetscape Project. In general new text is underlined and deleted text is in strike-through font.

- Project Description, Labeling of Figures. The following two figures have been revised to clarify the labeling of project alteratives. In the Draft EIR, they show lane configurations as "Alternative 1" and "Alternative 2". In the following what is labeled as Alternative 1 is EIR Alternative 2A, and what is labeled as Alternative 2 is Alternative 2B:

  3-11 North Figueroa Street*
  3-18 Colorado Boulevard*

  See revised figures.

- Page 4.1-14 (Table 4.1-5), daily construction emission significance impact revised as follows:

TABLE 4.1-5: DAILY CONSTRUCTION EMISSIONS – YEAR 2013

Construction Activity	Pounds Per Day					
	VOC	**NO_X**	**CO**	**SO_X**	**$PM_{2.5}$**	**PM_{10}**
On-Site	1	6	3	0	<1	<1
Off-Site	<1	<1	1	0	<1	<1
Maximum Regional Total	1	6	4	0	<1	<1
Regional Significance Threshold	**75**	**100**	**550**	**150**	**55**	**150**
Exceed Threshold?	No	No	No	No	No	No
Maximum On-Site Total	1	6	3	0	<1	<1
Localized Significance Threshold /a/	**--/b/**	**74**	**680**	**-- /b/**	**3**	**5**
Exceed Threshold?	--	No	No	--	~~Yes~~ No	~~Yes~~ No

/a/ The analysis assumed aone-acre project site and a 25-meter (82-foot) receptor distance.
/b/ SCAQMD has not developed localized significance methodology for VOC or SO_X.
SOURCE: TAHA, 2010.

- The second to last paragraph on page 4.1-14 (Localized Construction Emissions) is revised as follows:

  As shown in **Table ~~4.1-6~~4.1-5**, daily construction emissions would not exceed the SCAQMD localized significance thresholds. Therefore, the proposed projects would result in a less-than-significant impact related to localized construction emissions.

- The last paragraph on page 4.1-15 (Localized Operational Emissions) is revised as follows:

  Localized. ~~Reconfiguration of roadway striping would potentially remove one or more vehicular travel lanes. Alternatively, existing parking lanes could be removed instead of vehicular travel lanes to incorporate the proposed bicycle lanes. Reducing the number of travel lanes would result in local traffic congestion, resulting in a signalized intersection worsening Level of Service (LOS) E or F. Localized high concentrations of CO concentration could occur where large amounts of traffic operate under heavily congested conditions and if vehicles would be idling for a substantial period of time. Many roadway segments affected by the proposed projects already operate at or near capacity during peak hour periods and any incremental change in traffic volumes or vehicle idling emissions would not be significant. In addition, despite the fact the components of the proposed projects in traffic may decrease vehicle speeds and increase idle times at certain intersections, CO~~

~~concentrations in the Basin have not exceeded State standards since 1992 due to stringent State and federal mandates for lowering vehicle emissions. This is accurate even when considering the most congested City intersections with the highest traffic volumes and largest percentage of vehicle idle time. It is not anticipated that any intersection affected by the proposed projects contains the requisite vehicle volumes and delays to generate a CO hotspot. Therefore, the proposed projects would result in a less than significant impact related to localized CO concentrations.~~ Reconfiguration of roadway striping would potentially remove one or more vehicular travel lanes. For purposes of identifying a conservative estimate of delay, the EIR assumes that vehicle traffic volumes on the various affected roadway segments will remain unchanged even where there would be a reduction in travel lanes and roadway to accommodate bicycle lanes. The pollutant most affected by traffic delay is carbon monoxide. Typically, carbon monoxide emissions increases as vehicle speed decreases between the range of 10 miles per hour (mph) and 25 mph, and increase further as vehicles speed decreases to 2.5 mph idling speed, while carbon monoxide emissions decrease as vehicle speed decreases above 25 miles per hour. Where capacity is reduced there could be an incremental reduction in vehicle speeds along the affected street segments and there could be a localized incremental increase in carbon monoxide emissions. In some cases, where capacity is reduced, the number of vehicles passing through an intersection during the peak hour could decrease, which could lead to the peak period being extended, as well as modest increases in carbon monoxide emissions. Localized carbon monoxide concentrations could occur where large amounts of traffic operate under heavily congested conditions and if vehicles would be idling for a substantial period of time. Many roadway segments affected by the proposed projects are already congested and operate at, or near, capacity during peak hour periods and any incremental change in traffic volumes or vehicle idling emissions would not be significant.

Other factors taken in to account are: 1) the proposed project would affect capacity of approximately 0.5 percent of the roadway miles in the City of Los Angeles (32.5 miles out of 6,500) and 2) the existing ambient carbon monoxide levels are extremely low within the Los Angeles Air Basin. The one-hour concentration is typically 3 ppm and the 8-hour concentration is typically 2 ppm according to monitoring data for the SCAQMD monitoring station located in downtown Los Angeles. The Air Basin, is designated a maintenance area for carbon monoxide which means that that both State and federal air quality standards are satisfied. There are no air quality carbon monoxide hot spots within the basin as a whole or the City of Los Angeles in particular.

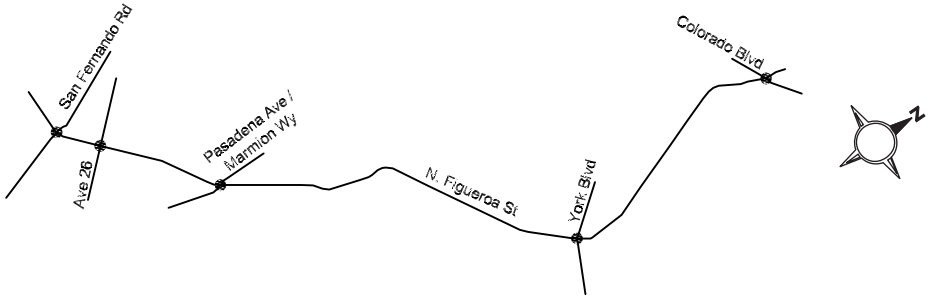
To trigger an impact, carbon monoxide emissions along any roadway segment affected by the project, would have to increase by almost 7 times in the peak hour or by four times over an 8-hour period. Because of the low ambient carbon monoxide condition, even where average street segment speeds could be reduced to almost zero the resulting carbon monoxide emissions would only increase by two times. Under the most extreme circumstance, the change in emission levels would not be high enough to cause an exceedance of the carbon monoxide air quality standard, and therefore would not result in a significant impact.

- Page 4.5-9 (Table 4.5-2), the delay and LOS for the intersections of Colorado Blvd and Eagle Rock and Colorado Blvd. and Sierra Villa are revised as follows:

No.	Street	Study Intersection	AM Peak Hour		PM Peak Hour	
			LOS	Delay (seconds)	LOS	Delay (seconds)
86	Colorado Blvd.	Sierra Villa Dr.	C	~~29.4~~ 23.5	F	~~246.6~~ 147.3
87		Eagle Rock Blvd.	~~D~~ C	~~37.0~~ 33.3	~~F~~ D	~~264.4~~ 51.2

- Page 4.5-10 the description of Metro services is revised as follows:

	EXISTING	PROJECT	ALTERNATIVE 2A	ALTERNATIVE 2B
N/S: N. Figueroa St E/W: Colorado Blvd	LOS: C / C Delay: 23.5 / 21.3	LOS: D / D Delay: 54.4 / 40.4	LOS: C / D Delay: 26.3 / 40.4	LOS: C / C Delay: 23.5 / 21.3
N/S: N. Figueroa St E/W: York Blvd	LOS: C / C Delay: 24.9 / 28.8	LOS: E / D Delay: 66.4 / 46.2	LOS: D / D Delay: 42.8 / 36.9	LOS: C / C Delay: 24.9 / 28.8
N/S: N. Figueroa St E/W: Pasadena Ave	LOS: B / B Delay: 19.7 / 13.2	LOS: C / B Delay: 25.1 / 13.4	LOS: C / B Delay: 25.1 / 13.4	LOS: B / B Delay: 19.7 / 13.2
N/S: N. Figueroa St E/W: Ave 26	LOS: D / D Delay: 54.1 / 38.9	LOS: F / D Delay: 149.5 / 45.7	LOS: D / D Delay: 53.1 / 39.1	LOS: D / D Delay: 54.0 / 38.9
N/S: N. Figueroa St E/W: San Fernando Rd	LOS: B / B Delay: 15.0 / 16.0	LOS: B / C Delay: 14.3 / 21.6	LOS: B / C Delay: 14.9 / 21.6	LOS: B / C Delay: 14.6 / 21.6

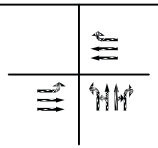
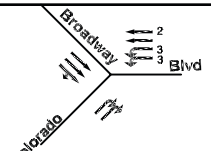
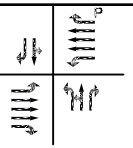
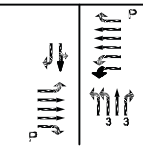
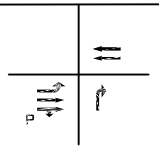
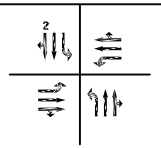
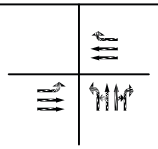
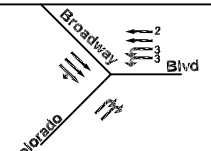
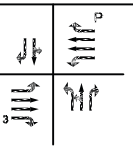
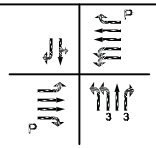
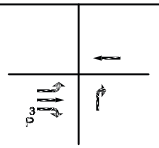
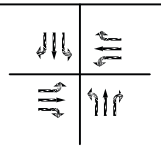
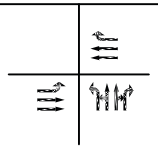
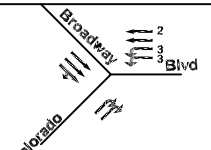
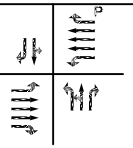
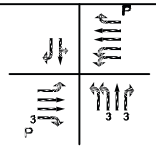
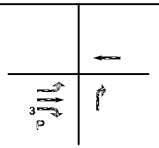
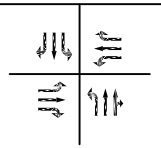
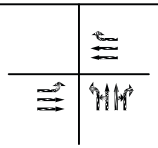
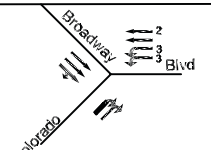
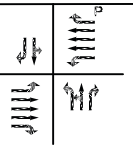
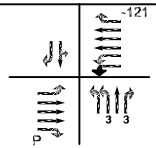
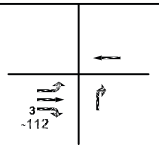
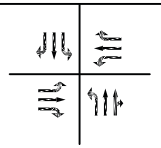


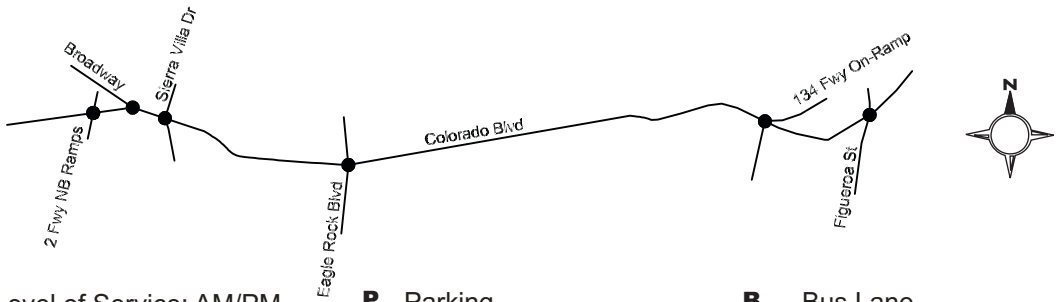
LEGEND:

- ● Study Intersection
- Intersection Lane Geometry
- **LOS** Level of Service: AM/PM
- **Delay** Delay: AM/PM (Second)
- **P** Parking
- **OP** Off-Peak Street Parking
- **B** Bus Lane
- **=#** Estimated Parking Loss

SOURCE: LADOT, 2012.

FIGURE 3-11
NORTH FIGUEROA STREET - EXISTING AND PROPOSED LANE INTERSECTION CONFIGURATIONS

	N/S: 2 Fwy NB Ramp E/W: Colorado Blvd	N/S: Broadway E/W: Colorado Blvd	N/S: Sierra Villa Dr E/W: Colorado Blvd	N/S: Eagle Rock Blvd E/W: Colorado Blvd	N/S: 134 Fwy Ramp E/W: Colorado Blvd	N/S: N. Figueroa St E/W: Colorado Blvd
EXISTING	 LOS: B / B Delay: 17.2 / 16.7	 LOS: B / B Delay: 13.2 / 17.1	 LOS: C / F Delay: 29.4 / 246.6	 LOS: D / F Delay: 37.0 / 264.4	 LOS: C / B Delay: 23.4 / 14.8	 LOS: C / C Delay: 29.4 / 20.7
PROJECT	 LOS: B / B Delay: 17.3 / 16.7	 LOS: B / B Delay: 12.8 / 17.0	 LOS: F / F Delay: 94.7 / 471.5	 LOS: F / F Delay: 111.4 / 453.0	 LOS: B / B Delay: 19.4 / 19.0	 LOS: E / D Delay: 57.9 / 41.7
ALTERNATIVE 2A	 LOS: B / B Delay: 17.2 / 16.7	 LOS: B / B Delay: 13.1 / 17.1	 LOS: C / F Delay: 30.0 / 262.6	 LOS: F / F Delay: 121.1 / 476.3	 LOS: B / B Delay: 19.4 / 19.0	 LOS: C / D Delay: 31.5 / 40.3
ALTERNATIVE 2B	 LOS: B / B Delay: 17.2 / 16.7	 LOS: B / B Delay: 13.2 / 17.1	 LOS: C / F Delay: 29.4 / 246.6	 LOS: D / F Delay: 37.0 / 264.4	 LOS: B / B Delay: 19.4 / 19.0	 LOS: E / D Delay: 57.9 / 41.7



LEGEND:

- Study Intersection
- Intersection Lane Geometry
- **LOS** Level of Service: AM/PM
- **Delay** Delay: AM/PM (Second)
- **P** Parking
- **OP** Off-Peak Street Parking
- **B** Bus Lane
- **=#** Estimated Parking Loss

SOURCE: LADOT, 2012

FIGURE 3-18
COLORADO BOULEVARD - EXISTING AND PROPOSED LANE INTERSECTION CONFIGURATIONS

Los Angeles County Metropolitan Transportation Authority (Metro). The Metro provides bus, light rail and subway services within the Los Angeles County. There are ~~six~~ four Metro light rail lines (i.e., Blue, ~~Red,~~ Green, Gold, ~~Purple,~~ and Expo), two subway lines (i.e., Red and Purple), and two ~~subway~~ bus lines (i.e., Orange and Silver) operating in exclusive right-of-ways.

- Page 4.5-19 (Table 4.5-5), delay and LOS for intersections of Colorado Blvd and Eagle Rock and Colorado Blvd. and Sierra Villa are revised as follows:

No.	Street	Study Intersection	AM Peak Hour				PM Peak Hour			
			LOS	Delay (sec)	Change in Delay	Sig Impact	LOS	Delay (sec)	Change in Delay	Sig Impact
86	Colorado Blvd.	Sierra Villa Dr.	~~F~~ D	~~94.7~~ 50.7	~~65.3~~ 27.2	YES	F	~~471.5~~ 350.9	~~224.9~~ 203.6	YES
87		Eagle Rock Blvd.	~~F~~ E	~~111.4~~ 55.7	~~74.4~~ 22.4	YES	F	~~453~~ 115.5	~~188.6~~ 64.3	YES

- Page 4.5-37, Footnote 28 is replaced with the following:

~~Injury types and their respective monetary values used are Fatality ($140,301), Severe Injury ($7,560), Other Visible Injury ($2,765), and Complaint of Pain ($1,572).~~ The values used for the safety benefits and methodology used in the benefit-cost calculator are on page 82 of the CalTrans Local Roadway Safety Manual (April 2012). Bicycle lanes in general reduce bicycle/pedestrian collisions by 35%..

Crash Severity **	Crash Cost *
Fatality (K)	$4,008,900
Severe/Disabling Injury (A)	$216,000
Evident Injury – Other Visible (B)	$79,000
Possible Injury – Complaint of Pain (C)	$44,900
Property Damage Only (O)	$7,400
* The letters in parenthesis (K, A, B, C and O) refer to the KABCO scale; it is commonly used by law enforcement agencies in their crash reporting efforts and is further documented in the HSM. ** Highway Safety Manual (HSM), First Edition, 2010.	

- In Chapter 5.0 Alternatives, the level of Service and Parking Tables are added for Alternatives 2A and 2B (Alternative 1 is existing conditions and shown in Section 4.5 and Alternative 3 is described qualitatively):

ALTERNATIVE 2A: INCREASED PARKING REMOVAL/ALTERNATE TRAVEL LANE IMPACTS

TABLE A: INTERSECTION LEVEL OF SERVICE -- ALTERNATIVE 2A

No.	Street	Study Intersection (1)	AM Peak Hour				PM Peak Hour			
			LOS	Delay (sec)	Change in Delay (sec)	Sig Impact	LOS	Delay (sec)	Change in Delay (sec)	Sig Impact
44	N. Figueroa St.	Colorado Blvd	C	28.1	2.4	NO	D	40.1	19.5	YES
45		York Blvd	D	42.8	17.9	YES	D	36.9	8.1	YES
46		Pasadena Ave	C	25.1	5.4	NO	B	13.4	0.2	NO
47		Ave 26	D	53.1	-1	NO	D	39.1	0.2	NO
48		San Fernando Rd	B	14.9	-0.1	NO	C	21.6	5.6	NO
84	Colorado Blvd.	SR-2 NB Ramps	B	17.2	0	NO	B	16.7	0	NO
85		Broadway	B	13.1	-0.1	NO	B	17.1	0	NO
86		Sierra Villa Dr	C	22.9	-0.6	NO	F	163.8	16.5	YES
87		Eagle Rock Blvd	E	56.4	23.1	YES	F	121.1	69.9	YES
88		SR-134 Ramps	B	19.3	-4	NO	B	19	4.3	NO
89		N. Figueroa St	C	28.1	2.4	NO	D	40.1	19.5	YES

/a/ Includes a duplicate study intersection of Figueroa Street/Colorado Boulevard.
SOURCE: LADOT, 2012.

TABLE B: LOSS OF PARKING SPACES -- ALTERNATIVE 2A

Bike Lane Corridors and Segments	No. of Parking Spaces Lost	Adjacent Land Uses	Parking Hours	
			N/W Side	S/E Side
N. Figueroa St.	N/A (Traffic and Transit Impacts Only)			
Colorado Blvd.	N/A (Traffic and Transit Impacts Only)			

Note: AM peak period typically lasts from 7:00 a.m. to 9:00 a.m., and PM peak period lasts from 4:00 p.m. to 6:00 p.m.
SOURCE: LADOT, 2012.

ALTERNATIVE 2B: INCREASED PARKING REMOVAL/ALTERNATE TRAVEL LANE IMPACTS VARIANT

TABLE C: INTERSECTION LEVEL OF SERVICE -- ALTERNATIVE 2B

No.	Study Corridor	Study Intersection	AM Peak Hour				PM Peak Hour			
			LOS	Delay (sec)	Change in Delay (sec)	Sig Impact	LOS	Delay (sec)	Change in Delay (sec)	Sig Impact
44	N. Figueroa St.	Colorado Blvd.	C	25.3	-0.4	NO	C	20.9	0.3	NO
45		York Blvd.	C	24.9	0	NO	C	28.7	-0.1	NO
46		Pasadena Ave.	B	19.7	0	NO	B	13.2	0	NO
47		Ave 26	D	54	-0.1	NO	D	38.9	0	NO
48		San Fernando Rd.	B	14.6	-0.4	NO	C	21.6	5.6	NO
84	Colorado Blvd.	SR-2 NB Ramps	B	17.2	0	NO	B	16.7	0	NO
85		Broadway	B	13.1	-0.1	NO	B	17.1	0	NO
86		Sierra Villa Dr	C	23.5	0	NO	F	147.3	0	NO
87		Eagle Rock Blvd	C	33.3	0	NO	D	51.2	0	NO
88		SR-134 Ramps	C	23.8	0.5	NO	B	18	3.3	NO
89		N. Figueroa St	C	25.3	-0.4	NO	C	20.9	0.3	NO

SOURCE: LADOT, 2012

TABLE D: LOSS OF PARKING SPACES -- ALTERNATIVE 2B

Bike Lane Corridors and Segments		No. of Parking Spaces Lost	Adjacent Land Uses	Parking Hours	
				N/W Side	S/E Side
N. Figueroa St.	San Fernando Rd to Ave 26	-19	Commercial	Ave 22 to Ave 26: All Day	All Day
	Ave 26 to Pasadena Ave.	-125	Residential & Commercial	Ave 26 to Ave 28: All Day except for AM Peak; Ave 28 to Pasadena Ave: All Day	All Day
	Pasadena Ave. to York Blvd.	-329	Residential & Commercial	All Day	All Day
	York Blvd. to Colorado Blvd.	-224	Residential	York Blvd to Meridian St: All Day; Myosotis St to Springvale Dr: All Day; Farrington St to Colorado Blvd: All Day	York Blvd to Ruby Place: All Day; St. Albans St to Annan Way: All Day; Yosemite Dr to Neola St: All Day
	AGG. LOSS	-697			
Colorado Blvd.	Eagle Rock Blvd to SR-134 Ramps	-233	Residential & Commercial	Eagle Rock Blvd to Marywood Ave: All Day; Shearin Ave to SR-134 Ramps: All Day	Eagle Rock Blvd to Mt. Helena Ave: All Day
	AGG. LOSS	-233			
TOTAL		**-2,177**			

NOTE: AM peak period typically lasts from 7:00 a.m. to 9:00 a.m., and PM peak period lasts from 4:00 p.m. to 6:00 p.m.
SOURCE: LADOT