



City of Los Angeles
Department of City Planning

City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012



FINAL
ENVIRONMENTAL IMPACT REPORT
CITY OF LOS ANGELES

City of Los Angeles Mobility Plan 2035
Case Number: ENV 2013-0911-EIR
RELATED CASE Number CPC-2013-0910-GPA-SP-CA-MSC
State Clearinghouse No. 2013041012

Project Description: The Mobility Plan 2035 (MP 2035) is a comprehensive revision of the adopted 1999 City of Los Angeles Transportation Element of the General Plan that will guide mobility decisions in the City through year 2035, coupled with supporting documents and discretionary actions to further align the City's street standards, processes and procedures with the goals of the MP 2035. Proposed components of MP 2035 include: (1) Policies – that support identified goals and objectives; (2) *Citywide General Plan Circulation System Maps* (Highways and Freeways map) including information about *Scenic Highways*; and (3) Action Plan – that identifies programs that support implementation of the Plan's goals and policies and aids the City in achieving its objectives (implementation of all or a portion of the Action Plan is incumbent upon staffing capacity and future funding). The Action Plan includes the Network Concept Maps that identify potential roadways for pedestrian, bicycle, transit, or vehicle enhancements as well as depicts existing freight movement facilities. The Networks take into consideration proposed and programmed projects from a variety of sources. MP 2035 is further supported by a Complete Streets Design Guide, an update to the Complete Street Standards (Standard Plan S-470-1) and a Five-Year Implementation Strategy.

The project does not authorize specific right-of-way improvements. Physical changes to the enhanced network system cannot occur without additional community engagement, design development and environmental review.

PREPARED BY:
Sirius Environmental

ON BEHALF OF:
The City of Los Angeles
Department of City Planning

May 2015

TABLE OF CONTENTS

	<u>Page</u>
1.0 INTRODUCTION.....	1-1
1.1 Intended Use of the Final EIR	1-1
1.2 Summary of the Proposed Project	1-2
1.3 Changes to the Mobility Plan 2035	1-3
1.4 Noticing and Availability.....	1-6
2.0 RESPONSE TO COMMENTS.....	2-1
2.1 Summary of Comments	2-1
2.2 Master Responses	2-8
2.3 Responses to Comments Letters Received on the Draft EIR	2-44
2.4 Responses to Comments Letters Received on the Recirculated Draft EIR	2-173
3.0 CORRECTIONS AND ADDITIONS.....	3-1
4.0 MITIGATION MONITORING PLAN.....	4-1
APPENDICES [ON CD]	
Appendix A Comment Letters	

TABLES

Table 2-1: List Of Commenters On The Draft EIR (February 2014)	2-2
Table 2-2: List Of Commenters On The Recirculated Draft EIR (February 2015)	2-5
Table 4-1: Mitigation Monitoring Plan	4-2

1.0 INTRODUCTION

This Final Environmental Impact Report (EIR) has been prepared to comply with the requirements of California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq. and the guidelines promulgated in connection therewith at Title 14 Code of California Regulation (CCR) Section 15000 et seq. (the “CEQA Guidelines”).

1.1 INTENDED USE OF THE FINAL EIR

This Final EIR was prepared at the direction and under the supervision of the City Los Angeles Department of City Planning (DCP). This Final EIR is required under CEQA Guidelines Section 15132 to include the Draft EIR; comments and recommendations received on the Draft EIR (either verbatim or in summary); a list of persons, organizations, and public agencies who commented on the Draft EIR; responses to significant environmental points raised in those comments; and other relevant information added by the lead agency.

This Final EIR is comprised of three chapters:

Chapter 1.0 Introduction. This chapter includes an overview of the proposed project, a summary of the alternatives considered, and a summary of the project’s potential environmental impacts.

Chapter 2.0 Comments and Responses. This chapter contains all of the written comments received by the City of Los Angeles during the public review period for the Draft EIR and Recirculated Draft EIR (RDEIR) and responses to each of those comments.

Chapter 3.0 Corrections and Additions. This chapter provides a list of changes made to the RDEIR in response to comments received during the 45-day public review period, and public hearing process, as well as some consistency and other non-substantive changes.

Issues raised by the public in response to the RDEIR warrant clarification or correction of certain statements in the RDEIR but none of the corrections and additions constitute significant new information as defined by CEQA Guidelines Section 15088.5. Information can include changes in the project or environmental setting as well as additional data or other information. New information is not significant unless the EIR is changing in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect. Significant new information could include the following:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
- The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

1.2 SUMMARY OF THE PROPOSED PROJECT

The Mobility Plan 2035 (MP 2035 or proposed project) would update the current Transportation Element (1999) and would provide a transportation blueprint for the City of Los Angeles through the foreseeable future (at least 2035). The MP 2035 reflects current State and regional policies and programs aimed at balancing land use and transportation planning and reducing vehicle miles travelled and associated greenhouse gas (GHG) emissions. The MP 2035 identifies a full range of options to meet mobility needs, including bicycling, carpooling, driving, transit, and walking. The MP 2035 would lay the policy foundation for safe, accessible and enjoyable streets for pedestrians, bicyclists, transit users, and vehicles alike.

The MP 2035 would replace the 1999 Transportation Element; it would update policies to reflect recent State requirements and recent guidance on GHG emissions and mobility in urban areas. The MP 2035 is being prepared in compliance with the 2008 Complete Streets Act (Assembly Bill 1358), which mandates that the circulation element of the General Plan be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan. Compliance with the Complete Streets Act is expected to result in increased options for mobility; fewer GHG emissions; more walkable communities; and fewer travel barriers for active transportation and those who cannot drive such as children or people with disabilities. Complete streets play an important role for those who would choose not to drive if they had an alternative as well as for those who do not have the option of driving. The Complete Streets Act specifically encourages an increase in non-driving modes of travel. The MP 2035 is also consistent with the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), as discussed in Table 4.2-3 of the RDEIR. The MP 2035 includes:

- **Policies** – that support the goals and objectives described above.
- **Citywide General Plan Circulation System** (Highways and Freeways Map) including information about Scenic Highways.
- An **Action Plan** – that identifies programs that support implementation of the Plan’s goals and policies and aids the City in achieving its objectives (implementation of all or a portion of the Action Plan is incumbent upon staffing capacity and future funding). The Action Plan includes the Network Concept Maps that identify potential roadways for pedestrian, bicycle, transit, or vehicle enhancements as well as depicts existing freight movement facilities. The Networks take into consideration proposed and programmed projects from a variety of sources.

The MP 2035 is further supported by the following documents:

- A **Complete Streets Design Guide** – a living document that provides a compilation of design concepts and best practices that promote the major tenets of Complete Streets-safety and accessibility.
- An **Update of Standard Plan S-470-1** to include an expanded suite of complete street arterials and non-arterials.
- A **Five-Year Implementation Strategy** – that prioritizes programs in the Action Plan for implementation within a defined five-year time period and identifies metrics upon which the success of each program should be evaluated. The Strategy is incumbent upon staff and funding availability. A draft of the first Five-Year Implementation Strategy is currently available, it identifies suggested milestones to achieve over the next five years (e.g. number of bicycle corrals and number of miles of NEN roadways to be improved) however, the priority and timing of individual projects is not identified and it provides no additional detail regarding design of individual projects, and therefore additional analysis beyond that included in this Final EIR is not feasible at this time. As individual projects move forward and design details become available, they will receive project-specific environmental review as appropriate.

As discussed above, the proposed project is a mix of policies and conceptual-level improvements to the transportation network. Detailed roadway designs for improvements to individual roadways or corridors are not yet available. Therefore, the proposed project was modeled within the regional transportation network on the basis of generalized assumptions that are appropriately summarized at the scale of communities and planning areas rather than at the level of individual roadways or corridors in order to present a programmatic-level analysis. Therefore impacts were analyzed at the area planning commission level of detail. For purposes of comparison of impacts between different areas of the City, the Area Planning Commission (APC) boundaries were selected as the most appropriate scale to analyze the various issue areas considered and to provide an area-level assessment of impacts (see **Master Response 22** in Section 2.2 of this Final EIR). As individual projects move forward, they will be evaluated at a project level, as appropriate.

The State as a whole, the City of Los Angeles included, is in transition with respect to the focus of transportation planning and traffic impact analysis. In the past the focus has been traffic delay-based with the objective of minimizing vehicle delay wherever possible. In the future, as directed by Senate Bill (SB) 743, the State, including the City of Los Angeles, will move to a vehicle-miles traveled (VMT)-focus, with the objective being to reduce VMT (and therefore GHG) as appropriate. The MP 2035 is a long-term plan intended to complement the VMT-focus of future transportation planning and implement the Complete Streets Act.

Existing Community Plans include policies related to decreasing delay and improving Level of Service (LOS); these policies may not be entirely compatible with reducing VMT and therefore they will be re-evaluated as Community Plans are updated. As Community Plans are updated they will be updated to reflect the latest RTP/SCS, the MP 2035 (once adopted), the Complete Streets Act as well as input from the community.

Until the Office of Planning and Research (OPR) Guidelines implementing SB 743 are finalized and become effective, and the City's corresponding CEQA Guidelines are revised and adopted, the City will continue to weigh and implement individual projects considering both delay and VMT and mitigating impacts for both. In the future, reducing VMT will become more of a priority, and mitigation measures that only reduce delay (included in the City's Traffic Improvement and Mitigation Programs and mitigation measures required of private projects) may no longer be required and therefore may not be implemented. Consistent with the MP 2035, Community Plans and private projects will be required to plan for and implement mitigation measures that reduce VMT, including aggressive Transportation Demand Management, and physical improvements that support the enhanced networks identified in MP 2035.

1.3 CHANGES TO THE MOBILITY PLAN 2035

The following represents the extent of changes that have been made to the MP 2035 since the most recent draft was released in February 2015 along with the RDEIR. The changes were undertaken in response to either comments received during the 45-day public comment period (February 19 - April 6) or technical corrections that were identified as needed to remedy either redundancies or typographical errors or to provide greater clarity to the reader.

The Highways and Freeways Map that originally conveyed only general information about a street's primary designation (Boulevard, Avenue) has been relabeled as the Citywide General Plan Circulation Map and regional maps have been inserted that illustrate not only the street's primary designation, but also information as to whether a street segment has modified dimensions, or is also a scenic highway or a divided highway.

All of the maps are now included within the body of the MP 2035 and are no longer a standalone Map Atlas. The Circulation Maps are referred to as the Citywide General Plan Circulation System Maps (replacing Highways and Freeways Map) and are included following page 18. Scenic Highways are included in the

Circulation Maps. The Network Maps are now referred to as the Network Concept Maps and are embedded in the Action Plan to provide initial guidance for the future implementation of engineering programs ENG, 3,6,14,15, 17, 18. The Goods Movement map is also included in the Action Plan for informational purposes.

NETWORK CHANGES

The changes listed below reflect network changes that were made in response to concerns from specific community areas.

Valley. Remove Roscoe Boulevard between Canoga Avenue and Van Nuys Boulevard from the Bicycle Enhanced Network (BEN) and instead substitute Parthenia Street as a BEN through this same extent. Due to the selection of Roscoe Boulevard as a Transit Enhanced Network (TEN) Corridor, it would be infeasible for a protected bicycle lane to also be included.

Hollywood. Remove the portion of Sunset Boulevard between the border with the City of West Hollywood and Highland Avenue from the Vehicle Enhanced Network (VEN). Due to changes in the land use patterns along Sunset Boulevard west of Highland Avenue, as well as the extension of Sunset Boulevard into an adjoining City, where the VEN improvements are not currently being contemplated, it was logical to terminate the portion of Sunset Boulevard on the VEN at a location where it connected with Highland Avenue, which is also on the VEN.

Remove the portion of Hollywood Boulevard between Fairfax Avenue and La Brea Avenue from the BEN. The character of Hollywood Boulevard changes dramatically west of La Brea Avenue. The street narrows considerably from two lanes in each direction, with parking and a center turn lane, to one lane in each direction, with parking and a center turn lane, and the land uses change to predominantly multi-family residential uses compared to the heavily commercial character east of La Brea Avenue. These characteristic differences illustrate the challenges of including this portion of Hollywood Boulevard on the BEN as the roadway constraints would prohibit the opportunity to install a bicycle lane, let alone a protected bicycle lane. Instead, it will be preferred to encourage bicyclists to utilize streets on the Neighborhood Enhanced Network (NEN) through this portion of Hollywood.

Remove the portion of Highland Avenue between Hollywood Boulevard and Melrose Avenue from the BEN and instead upgrade Orange Avenue (just west of Highland Avenue) to a priority NEN as a preferred north/south bicycle facility. Because this segment of Highland Avenue had also been identified as a VEN Corridor, it would have been infeasible to accommodate a protected bicycle lane. For the purposes of long range planning, Highland Avenue is still identified as a possible planned future bicycle lane.

Remove Beachwood Canyon and adjoining local streets north of Franklin Avenue from the NEN. The community felt strongly that the potential improvements identified for this corridor would be infeasible due to the steep inclines and curves.

Remove Cahuenga Boulevard between Franklin Avenue and Lankershim Boulevard from the BEN, but retain this segment as a potential planned bicycle lane in the long-term. Limited roadway width through the Cahuenga Pass makes the installation of a protected bicycle lane through this corridor infeasible at this time.

Mid-City. Change Sixth Street between San Vicente Boulevard and Fairfax Avenue from a protected bicycle lane on the BEN to a priority NEN segment. This change reflects the narrower road configuration and single-family residential uses along this stretch compared to the section east of Fairfax Avenue.

Westside. Remove Veteran Avenue from the priority NEN and remove Santa Monica Boulevard, west of Westwood Boulevard, from the BEN. Veteran Avenue, in particular, due to its hilly condition north of Santa Monica Boulevard, does not provide the most comfortable bicycling experience and, therefore, it was determined that Prosser Avenue, to the east, would better serve the bicycling community with a quality

north-south bicycle facility. The east-west segment on Santa Monica Boulevard was then subsequently removed due to lack of a north-south corridor to connect to.

Modify the priority NEN alignment by removing the segment of McLaughlin Avenue, south of Venice Boulevard, and substituting it with Inglewood Boulevard in order to provide a seamless connection to the Culver Boulevard Median Bicycle path.

STREET DESIGNATIONS

The following streets were downgraded due to improved street dimension information that identified these street segments as being narrower than previously had been determined.

- South Huntington Drive- Changed from Boulevard II to Avenue III.
- Sunset Boulevard/Cesar Chavez Avenue between Fountain Avenue and Mission Road from Boulevard II to Avenue I.
- Sunset Boulevard between Swarthmore Avenue and Rustic Lane from Avenue I to Avenue II.
- Fountain Avenue between La Brea Avenue and Vermont Avenue from an Avenue II to a Collector.
- La Mirada Avenue between Bronson and Van Ness Avenues from Avenue III to a Collector and between Van Ness Avenue and Wilton Place to a Local Street.

Modified Street Designations

The modified dimension for Motor Avenue between Woodbine Street and Venice Boulevard was changed from an 86-foot right-of-way (ROW)/66-foot Roadway to an 86-foot ROW/62-foot Roadway to correct a previous typographical error. The roadway dimension is currently 62 feet and not 66 feet.

POLICY CHANGES

The following policy changes were made in response to public comment:

- Policy 2.4 about the NEN was changed to allow speeds up to 20 miles per hour (mph) on a NEN street compared to the original 15 mph. This aligns the street speed with the National Association of City Transportation Officials (NACTO) recommendations.
- Policy 4.15 was modified to require a public hearing for the removal of not just bicycle lanes, but all bicycle facilities. This change will protect any bicycle facility from being errantly removed without full public discourse.

TEXT CHANGES

A reader's guide was added to the MP 2035 to provide a detailed description of the role and purpose of general plans and the adoption and implementation process.

CHANGES TO FORMAT AND DISPLAY OF MAPS

The Highways and Freeways Map that originally conveyed only general information about a street's primary designation (Boulevard, Avenue) has been relabeled as the Citywide General Plan Circulation Map and regional maps have been inserted that illustrate not only the street's primary designation, but also information as to whether a street segment has modified dimensions, or is also a scenic highway or a divided highway.

Both the Circulation Maps and the Network Maps are now included within the body of the MP 2035 and are no longer a standalone Map Atlas.

UPGRADED APPENDIX F

Appendix F of the MP 2035 has been upgraded to reflect the complete list of street segments that have modified street dimensions. Modified dimensions imply that either the street's ROW or roadway dimensions or both differ from the standard dimension for that particular street designation.

PROGRAM DELETIONS

The following programs have been removed as they were determined to be either infeasible, redundant or unnecessary:

- Bicycle Buddy Program (was C.2)
- County Congestion Mitigation Fee (was F.4)
- Internal Streets Working Group (was MG.4)
- Public Hearing Process for Bicycle Facility Removal (was MG.6- upgraded to policy)
- Technology (was O.10)

Section 15088.5 of the CEQA Guidelines requires that a lead agency recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. The proposed changes considered as part of this Final EIR would constitute minor alterations that would not result in new information as defined under Section 15088.5. As stated in CEQA Guidelines Section 15088.5, “[n]ew information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement.”

The public would not be deprived of the opportunity to comment on an adverse environmental effect, as no new environmental effects would result from the proposed changes. The proposed changes would not require additional analysis or create circumstances involving new or substantially more severe impacts that were not already identified in the RDEIR. Therefore, no recirculation of EIR is required.

1.4 NOTICING AND AVAILABILITY

Pursuant to CEQA Guidelines Section 15082, a Notice of Preparation (NOP) for the Draft EIR was issued on April 4, 2013 for a 30-review period. A total of 33 comment letters were received. Information, data and observations resulting from these letters are included throughout this Draft EIR, where relevant. Two public scoping meetings were held on April 16 and 22, 2013. The purpose of these meetings was to provide early consultation for the public to express their concerns about the proposed projects, and acquire information and make recommendations on issues to be addressed in the Draft EIR. A Draft EIR for the proposed project was circulated to the public for 90 days (February 13, 2014 to May 13, 2014). Comments were received on both the Draft MP 2035 and the MP 2035 Draft EIR (approximately 41 letters contained comments on the Draft EIR). The comments and the corresponding responses relevant to the EIR are presented in Chapter 2.0 Responses to Comments of this Final EIR.

Subsequently, the MP 2035 EIR was recirculated to reflect an updated project description (plan) based on continued agency coordination and public comments received on the Draft MP 2035 and Draft EIR. The RDEIR included the following changes from the Draft EIR:

The RDEIR reflected a conservative view of potential reductions in vehicular capacity from the Bicycle Lane Network as well as additional miles of transit enhancements. The RDEIR also identified three additional alternatives to the proposed project (one of which – Alternative 3 – was similar to the old project analyzed in the previous Draft EIR); a total of five project alternatives are analyzed in the RDEIR. The Recirculated MP 2035 Draft EIR together with the revised Draft MP 2035 were circulated for a 45-day public review

period (February 19, 2015 to April 6, 2015). During the review period, 152 written comment letters were received on the RDEIR from public agencies, groups, and individuals. These comments and the corresponding responses are also presented in Chapter 2.0 Responses to Comments of this Final EIR.

Comments received on the plan only (Draft MP 2035 and Revised Draft MP 2035) are addressed in the Staff Report.

The Final EIR is available for review online at www.lacity.org and at the following locations:

City Hall

200 N. Spring Street
Los Angeles, CA 90012

Van Nuys Civic Center

14410 Sylvan Street
Van Nuys, CA 91401

Central Library

630 W. 5th Street
Los Angeles, CA 90071

Exposition Park Library

3900 S. Western Avenue
Los Angeles, CA 90062

San Pedro Library

931 S. Gaffey Street
San Pedro, CA 90731

Arroyo Seco Library

6145 N. Figueroa Street
Los Angeles, CA 90042

North Hollywood Library

5211 Tujanga Avenue
North Hollywood, CA 91601

Mid-Valley Library

16244 Nordhoff Street
North Hills, CA 91343

West Valley Library

19036 Vanowen Street
Reseda, CA 91335

Goldwyn-Hollywood Library

1623 N. Ivar Avenue
Los Angeles, CA 90028

West Los Angeles Library

11360 Santa Monica Boulevard
Los Angeles, CA 90025

The RDEIR and Final EIR can be downloaded or reviewed via the Internet at the Department of City Planning's website [<http://planning.lacity.org/> (click on "Environmental" and then "Final Environmental Impact Reports")]. The Final EIR can be purchased on cd-rom for \$7.50 per copy. Contact **My La** of the City of Los Angeles at My.La@lacity.org for purchase.

2.0 RESPONSE TO COMMENTS

This chapter contains comments received by the City of Los Angeles (City) during the public review period for the proposed Mobility Plan 2035 (MP 2035 or proposed project) Draft Environmental Impact Report (EIR) and Recirculated Draft EIR (RDEIR).

Both the MP 2035 and the MP 2035 Draft EIR were circulated (and recirculated) at the same time for public review. The documents were initially circulated for a 90-day review period beginning on February 13, 2014 and closing on May 13, 2014. The MP 2035 Draft EIR was recirculated to reflect the updated project description based on continued agency coordination and public comments received on the Draft MP 2035 and Draft EIR. The RDEIR (and revised Draft MP 2035) was circulated for a 45-day public review period from February 19, 2015 to April 6, 2015.

During both review periods, written comment letters were received on both the MP 2035 and the MP 2035 Draft EIR/RDEIR from public agencies, groups, and individuals. Responses to comments on the MP 2035 are provided in the MP 2035 Staff Report. Some letters contain both comments on the Draft EIR/RDEIR and the MP 2035. In these cases the comments are separated and the Draft EIR/RDEIR comments are addressed herein and comments on the MP 2035 are addressed in the Staff Report. All comments that relate to environmental impacts are addressed in this Final EIR, in some cases, for informational purposes, responses to comments related to the MP 2035 are provided (e.g. regarding funding concerns). Responses to comments on the Draft EIR/RDEIR are provided below.¹ All comments will be forwarded to the decision-maker for their consideration in taking action on the project. The responses to comments are intended to provide the City's considered response to each comment and any supporting arguments, statements, opinions, information, data, and/or analysis provided in the commenter's entire correspondence or communication to the City, notwithstanding that such arguments, statements, opinions, information, data and/or analysis are not provided in the quoted comment.

This document includes verbatim transcripts of the comments on the Draft EIR/RDEIR (copies of the actual letters, marked up to show how the comments are numbered, are included in **Appendix A**). Responses are provided after each comment. In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, the responses to comments on environmental issues describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). Reasons are provided when recommendations, suggestions, and objections raised in comments letters were not accepted. Issues raised by the public in response to the Draft EIR/RDEIR warrant clarification or correction of certain statements in the Draft EIR/RDEIR but none of the corrections and additions constitute significant new information as defined by CEQA Guidelines Section 15088.5, and, therefore, the Draft EIR/RDEIR does not need to be recirculated anew.

2.1 SUMMARY OF COMMENTS

Table 2-1 lists all the letters received on the Draft EIR regarding the proposed project. As indicated in **Table 2-1**, each comment letter was assigned a number and then within each letter. Similarly, **Table 2-2** lists all the letters received on the RDEIR regarding the proposed project. Comments are individually numbered.

¹In the responses, all references to the Draft EIR and/or RDEIR refer to the analysis contained in the environmental documentation circulated to the public for review. The RDEIR updates the Draft EIR and represents the most current analysis in the environmental record prior to the release of this Final EIR.

TABLE 2-1: LIST OF COMMENTERS ON THE DRAFT EIR (FEBRUARY 2014)			
No.	Name	Organization/Address	Page Number
REGIONAL AND LOCAL AGENCIES			
100.	John R. Anderson	Los Angeles Unified School District, Office of Environmental Health and Safety 333 South Beaudry Avenue, 28 th Floor Los Angeles, CA 90017	2-44
101.	(Yen) Ken Chiang	California Public Utilities Commission 320 West 4 th Street, Suite 500 Los Angeles, CA 90013	2-45
102.	Deborah Weintraub	Bureau of Engineering 1149 S. Broadway, Suite 700 Los Angeles, CA 90015-2213	2-46
103.	Scott Morgan	State of California Governor's Office of Planning and Research 1400 10 th Street Sacramento, CA 95812	2-48
104.	Dave Singleton	Native American Heritage Commission 1550 Harbor Boulevard, Suite 100 West Sacramento, CA 95691	2-49
105.	Dianna Watson	State of California Department of Transportation District 7, Office of Transportation Planning 100 Main Street, MS #16 Los Angeles, CA 90012	2-52
106	Paul Koretz	Councilmember Office, Fifth District 200 N. Spring Street, Room 440 Los Angeles, CA 90012	2-57
ORGANIZATIONS			
200.	Westwood South of Santa Monica Blvd. Homeowner's Association	P. O. Box 64213 Los Angeles, CA 90064-0213	2-60
	Arthur L. Kassan (Attachment: Westwood HOA Letter)	5105 Cimarron Lane Culver City, CA 90230	2-65
201.	Jeff Jacobberger	Bicycle Advisory Committee of the City of Los Angeles	2-70
202.	Jan Reichmann	Comstock Hills Homeowners Organization 1429 Comstock Avenue Los Angeles, CA 90024	2-75
203.	James O'Sullivan	Fix the City Inc. 907 Masselin Avenue Los Angeles, CA 90036	2-76
204.	Mary Silverstein	Harbor Community Benefit Foundation	2-86
205.	Gerald A. Silver	Homeowners of Encino PO Box 260205 Encino, CA 91426	2-88
206.	John T. Walker	South Carthay Neighborhood Association	2-94
207.	Stevie Stern	United Neighborhoods of the Historic Arlington Heights, West Adams and Jefferson Park Neighborhood Council P.O. Box 79219 Los Angeles, CA 90019	2-98
208.	Terri Tippit	West of Westwood HOA P.O. Box 64496 Los Angeles, CA 90064	2-100
209.	Terri Tippit	Westside Neighborhood Council P.O. Box 64370 Los Angeles, CA 90064	2-103
210.	Constance Boukidis	Westwood Neighborhood Council	2-108
211.	Joe Jordan	Wilshire Vista Neighborhood Association	2-110
212.	Patricia Ochoa	Coalition for Clean Air 800 Wilshire Blvd., Suite 1010 Los Angeles, CA 90017	2-111

TABLE 2-1: LIST OF COMMENTERS ON THE DRAFT EIR (FEBRUARY 2014)			
No.	Name	Organization/Address	Page Number
213.	Colleen Mason Heller	Cheviot Hills Home Owners Association	2-115
INDIVIDUALS			
300.	Amy Raff and Abe Rotchel		2-123
301.	Bennett and Marilyn Cohon	1906 Prosser Avenue Los Angeles, CA 90025	2-124
302.	Beverly and Andy Crist		2-125
303.	Carole Miller		2-126
304.	Carolyn Flusty		2-127
305.	Charles Edelson	10334 Wilkins Avenue Los Angeles, CA 90024	2-128
306.	Chris		2-133
307.	Debbie & Howard Nussbaum		2-134
308.	Dr. Robert Newport		2-135
309.	Joyce Dillard		2-136
310.	Lori Matson	5538 Packard Street Los Angeles, CA 90019	2-139
311.	Luke Klipp		2-140
312.	Ronald Ziff	Sherman Oaks Neighborhood Council	2-141
313.	Rosalie Preston		2-142
314.	Sarah LaBrache	1216 S. Curson Avenue Los Angeles, CA 90019	2-143
315.	Stephen and Linda Friedland	1130 S. Orlando Avenue Los Angeles CA 90035	2-144
316.	Steward Chesler	4630 Willis Oaks Avenue, No. 203 Sherman Oaks CA 91403	2-145
317.	Robert Pflug	1256 Masselin Ave. , Los Angeles, CA 90019	2-146
318.	Jeff Jacobberger		2-147
319.	Bennet Cohon		2-148
PUBLIC MEETINGS AND ONLINE			
	<i>3/15/2014</i>	<i>North Valley Public Meeting (Oral)</i>	
400-1	Robert A. Rouge		2-149
400-2	Rene Trinidad		2-149
400-3	Jack		2-149
	<i>3/19/2014</i>	<i>Central Public Meeting(Oral)</i>	
400-4	Kenny Easwaran		2-149
400-5	Keenan Sheedy		2-150
400-6	R.J. Strotz		2-150
	<i>3/22/2014</i>	<i>South Public Meeting(Oral)</i>	
400-7	Rudy Barbee		2-151
400-8	Sherri Franklin		2-151
	<i>3/29/2014</i>	<i>East Public Meeting(Oral)</i>	
400-9	Susan Rocha		2-151
400-10	Aracely Rosas		2-152
400-11	Richard Zaldivar		2-152
	<i>4/2/2014</i>	<i>West Public Meeting(Oral)</i>	
400-12	Jack Fujimoto		2-153
400-13	Jean Kuntz		2-153
400-14	Stephen Resnick		2-153
400-15	Margaret Healy		2-154
400-16	Steve Sann		2-154
400-17	Jerry Brown		2-154
400-18	Wolfgang Veith		2-155
400-19	Steve Fox		2-155
	<i>4/5/2014</i>	<i>South Valley Public Meeting(Oral)</i>	

TABLE 2-1: LIST OF COMMENTERS ON THE DRAFT EIR (FEBRUARY 2014)			
No.	Name	Organization/Address	Page Number
400-20	Meg Foss		2-155
400-21	Quirino de la Cuesta		2-155
400-22	Dianne		2-156
400-23	Michelle Klein-Hass		2-156
400-24	Ron Ziff		2-156
400-25	Lisa Sarkin		2-156
400-26	Gregory Wright		2-157
400-27	Esther Ahn		2-157
		<i>North Valley Public Meeting(written)</i>	
401-1	Dean Cohen		2-158
401-2	Mark Lopez		2-158
401-3	Tony Wilkinson		2-158
		<i>Central Public Meeting(written)</i>	
401-4	Kenny Easwaran		2-160
401-5	Berta Avila		2-160
401-6	RJ Strotz		2-161
401-7	Skylar Boorman		2-161
401-8	Dennis Hindman		2-161
401-9	Marc Caswell		2-162
		<i>South Valley Public Meeting(written)</i>	
401-10	Michael Macdonald		2-162
401-11	Jessica Medina		2-163
		<i>East Valley Public Meeting(written)</i>	
401-12	Lisa Duardo		2-163
401-13	Michelle Rivera		2-163
		<i>Westside Public Meeting(written)</i>	
401-14	Margaret Healy		2-164
401-15	Jean-Marie Winikates		2-165
401-16	Charles Healy		2-165
401-17	Dylan Smith		2-165
401-18	Ann Sewill		2-166
401-19	n/a		2-166
401-20	Roxane Stern		2-167
401-21	Judith Pacht		2-167
401-22	Scott Sing		2-167
401-23	Reilly Myers		2-167
401-24	Marilyn Tusher		2-168
401-25	Andy Ikeda		2-168
		<i>South Valley Public Meeting(written)</i>	
401-26	Gregory Wright		2-168
401-27	Margaret Shoemaker		2-169
401-28	Jim Houman		2-169
401-29	Sarah Ramsawach		2-170
401-30	Penny Meyer		2-170
		<i>Harbor Public Meeting(written)</i>	
401-31	Daniel Rodman		2-170
		<i>Mind Mixer(online forum)</i>	
401-32	Joseph S.		2-170
401-33	Joseph S.		2-171
401-34	Joseph S.		2-171
401-35	Kenny E.		2-172

TABLE 2-2: LIST OF COMMENTERS ON THE RECIRCULATED DRAFT EIR (FEBRUARY 2015)			
No.	Name	Organization/Address	
REGIONAL AND LOCAL AGENCIES			
R100	Nareh Nazary	Los Angeles County Metropolitan Transportation Authority (LACMTA) Development Review One Gateway Plaza MS 99-18-3 Los Angeles, CA 90012-2952	2-173
R101	Juan M. Sarda, P.E.	County of Los Angeles Department of Public Works Land Development Division Subdivision Mapping Section, CUP/CEQA/B&T Planning Unit	2-175
R102	Ali Poosti, Division Manager	City of Los Angeles Wastewater Engineering Services Division Bureau of Sanitation	2-176
ORGANIZATIONS			
R200	James O'Sullivan	Fix the City Inc. 907 Masselin Avenue Los Angeles, CA 90036	2-178
R201	Susan Grossman	Hancock Park Homeowners Association 137 N. Larchmont Boulevard, #719 Los Angeles, CA 90004	2-190
R202	Don Andres	Franklin/Hollywood West Residents Association andres2007@sbcglobal.net	2-195
R203	Jim Van Dusen	Hollywoodland Homeowners Association	2-197
R204	Charles Taylor Brown; William Funderburk; Michelle Owen; Cathy Roberts; Justin Urcis	La Brea-Hancock Homeowners' Association	2-199
R205	Laura	Save Westwood Village Fix the City	2-201
R205A	Laura	Save Westwood Village Fix the City	2-213
R206	Dr. Jerry Brown	Westwood Neighborhood Council	2-215
R207	Barbara Broide	Westwood South of Santa Monica Blvd Homeowner's Association	2-216
R208	Marilyn Tusher	Westwood Gardens Civic Association	2-230
R209	Aaron Rosenfield	West of Westwood Homeowners Association	2-232
R210	Debbie and Howard Nussbaum	Westwood Hills	2-245
R211	Aaron Rosenfield	Westside Neighborhood Council	2-252
R212	Fran Reichenbach	Beachwood Canyon Neighborhood Association	2-253
R213	Sarajane Schwartz	United Homeowners on Beachwood Drive	2-254
INDIVIDUALS			
R300	Aaron Jackson; Adriana Mardirosian; Alan Poul; Alla & Michael Olshansky; Andrew Carrollman; Andy Gould; April Blair; Arash Yaghoobian MD; Barbara Bagley; Benjamin Kushner; Brooke Senior; Bruce Remick; Caryn Jackson; Catherine Olim; Charlie Mcbrearty; Cherilyn Smith; Cheryl Holl&; Chip Sullivan; Claire Guy; Chris Alex&er; Courtney Small; Darren Higman; David Bonicatto; David Nicksay; Deborah Rosenthal; Denise Foley; Donald Wasson; Ellen & Todd Cheney; Ellen Pittleman; Erik Mcdowell; George Underwood; Adilman, Glenn; Gwen Hitchcock; Halsted Sullivan; Helen Berman; Helen Klein & Elie Daher; Ida Spencer; Jason Reilly; Jeanine Tasudis; Jeffrey Hersh; Robin &	Sunset and Spaulding Squares	2-255

TABLE 2-2: LIST OF COMMENTERS ON THE RECIRCULATED DRAFT EIR (FEBRUARY 2015)			
No.	Name	Organization/Address	
	Jeffrey Smalley; Jenifer Barkon; Jim Mckenzie; Joan Foley Mann & Stanley Mann; Joel Alaniz; Julie Breaux; Karen Kondazian; Kathryn Dora Brown; Kevin Batten; Kitty Wise; Kyrstin Munson; Lara Cody Curci; Larry A Hoffman; Lily Mariye; Marc Fogel; Martin & Mary Samuel; Michael Janofsky; Michael B. Levine; Michael Mendelsohn; Michael Moran; Tamara Bergman & Michael Schwartz; Michael Tredo; Michelle Pollack; Nathalie Samanon; Neal Avron; Pam Griffiths; Pamela & Bill Bothwell; Robert Mott & Thai Lam; Robert Smith; Robyn Weisman; Robyn Westcott; Ronald & Constance Spriestersbach; Sally Struthers; Sarah Boyer & Adam Leber; Susan Pintar; Susan Davis & Lloyd Taylor; Tamara Bergman & Michael Schwartz; Theresa Laughlin; Tilton Terri; Timothy K. Brock; Todd Romanick; Wendy Kneedler, Stephen Steelman		
R301	Wendy Ellis		2-260
R302	Catherine Des Lauriers	Spaulding Square 1325 N. Genesee Avenue Los Angeles, CA 90046	2-261
R303	Bill Kearney	blinden@earthlink.net	2-262
R304	Dietrich Nelson	Dietrich Nelson & Associates, Inc. 510 W. Sunset Blvd, #1415 Los Angeles, CA 90046	2-263
R305	Fran Offenhauser	8630 Hillside Ave Los Angeles, 90069	2-266
R306	Gail Natzler	grinon@earthlink.net	2-269
R307	Jim Geoghan	bangzoomer@aol.com	2-270
R308	James McFadden	lajmac@aol.com	2-271
R309	Jim Stevely	agave8@yahoo.com	2-272
R310	John B. Campbell	2424 Castilian Dr Los Angeles, CA 90068 2013	2-273
R311	Joyce Dillard	dillardjoyce@yahoo.com	2-277
R312	John Coghlan	coghlanjohn@yahoo.com	2-282
R313	Joyce and Stanley Dyrector	jdrector@aol.com	2-283
R314	Ken Koonce	kkoonce@roadrunner.com	2-285
R315	Kennon B. Raines	kraines@sbcglobal.net	2-286
R316	Nazo L. Koulloukian, Esq.	Joseph Farzam Law Firm 7135 Hollywood Blvd., Unit 1108 Los Angeles, CA 90046	2-287
R317	Liza Marie Milat	7135 Hollywood Blvd., Apt. 410 Los Angeles, CA 90046	2-291
R318	Mary Helen Berg	mhberg@sbcglobal.net	2-292
R319	Melissa Card	mcard89@yahoo.com	2-293
R320	Patrick Micallef	tiquetloisir@icloud.com	2-294
R321	Richard Barrow	rihcardbarrow1@yahoo.com	2-295
R322	Ron and Ronni Scardera	rrscar@pacbell.net	2-297
R323	Rino Romano	rinovoice@gmail.com	2-298
R324	Sandro Reinhardt	dtown1000@yahoo.com	2-300

**TABLE 2-2: LIST OF COMMENTERS ON THE RECIRCULATED DRAFT EIR
(FEBRUARY 2015)**

No.	Name	Organization/Address	
R325	Shelley Mitchell	shellmit@gmail.com	2-302
R326	Sylvia J. Morales	sylviam@williamsworldwidetv.com	2-303
R327	Terry Tegnazian	10850 Wilshire Blvd., Suite 300 Los Angeles, CA 90024	2-304
R328	Theresa Laughlin	terry.laughlin@sbcglobal.net	2-311
R329	Thomas Watson	thomasbwatson@gmail.com	2-312
R330	Tom Engfer	tomengfer@gmail.com	2-313
R331	Tom Williams		2-314
R332	Carolyn Thomas	carolyn.thomas@me.com	2-315
R333	Christine Mills O'Brien	2811 Westshire Drive Los Angeles, CA 90068	2-316
R334	Donald Riedel	Skiierdon@aol.com	2-317
R335	Edward Sheftel	EdSheftel@iheartmedia.com	2-318
R336	Eugene Gordon	eugene@nostaticav.com	2-319
R337	Hope Anderson	hopeanderson09@gmail.com	2-320
R338	Jonny MF Ernst	pnoboy@aol.com	2-321
R339	Jamie Rubin	jamierubin@gmail.com	2-322
R340	Joanne D'Antonio	jodantonio@aol.com	2-323
R341	Jonathan Gordin	jonathan.gordin@gmail.com	2-324
R342	Phil Friedman	kneedlersr@gmail.com	2-325
R343	Jack and Michelle Conrad	Kcaj Benhadden	2-326
R344	Laura Davis	laura@lauradavisproductions.com	2-327
R345	Maureen Tabor	maurentabor@maurentabor.com	2-328
R346	Paula Escott	paulasaker@me.com	2-329
R347	Rio Phior	rio.phior@sagon-phior.com	2-330
R348	Scott Freeburg	scottfreeburg@gmail.com	2-331
R349	Scott Thaler	scottthaler@mac.com	2-332
R350	Tony Clark	clarkarts@aol.com	2-333
R351	Yvonne Westbrook	yvonne@westbrooktherapy.com	2-334
R352	Tim Armitage	timarmitage@gmail.com	2-335
R353	Janet Carper	janet.carper12@gmail.com	2-337
R354	Peggy Webber McClory	cartradiola@yahoo.com	2-341

2.2 MASTER RESPONSES

Based on comments received on the Draft EIR and RDEIR, the following Master Responses were developed to address topics/issues that were brought up in multiple instances.

Master Response 1: Traffic Impact Analysis Methodology

Several comments received on the Draft EIR and RDEIR expressed concerns regarding the congestion and/or level of service (LOS) along specific segments and at intersections within the City, and whether the traffic analysis included cumulative related development and transportation projects.

Traffic impact analysis is provided in Section 4.1 of the Draft EIR and supported by the supplemental information contained in Appendix C. The Draft EIR concluded that for several traffic related impact areas, the project would have significant and unavoidable impacts. See RDEIR at page 4.1-35 (exceed adopted thresholds for LOS); page 4.1-36 (neighborhood intrusion); page 4.1-43 (freeway impacts); page 4.1-44 (emergency vehicle access). This master response explains the methodology used for the traffic analysis in the EIR for informational purposes, including the methodology for considering cumulative impacts, and why the best available methodology tends to be vehicle-centric. Additional discussion of the scope or level of analysis is presented in **Master Response 22**, which addresses why the EIR does not analyze at the street/intersection level as has been requested/demanded by some commenters.

As described in **Section 4.1 Transportation, Parking and Safety**, the model used to analyze the MP 2035 is based on the City's Transportation Strategic Plan (TSP) model, developed by Fehr & Peers, which uses the TransCAD Version 4.8 Build 500 modeling software and was initially calibrated and validated to 2008 conditions (and later updated to the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy [RTP/SCS]). Since the development of the TSP model, the City has used this forecasting tool on multiple projects and it is now referred to as the City of Los Angeles' Travel Demand Forecasting (TDF) Model. The model captures planned growth within the City, including special generators, such as the Port of Los Angeles, Los Angeles International Airport (LAX), and Universities (see Appendix C). The model forecasts AM and PM peak period and daily vehicle and transit flows on the transportation network within the City.

Since the development of the City's TDF Model, the Southern California Association of Governments (SCAG) adopted the 2012-2035 RTP/SCS. The 2012-2035 RTP/SCS Model forecasts long-term transportation demands and identifies policies, actions, and funding sources to accommodate these demands. The 2012-2035 RTP/SCS Model provides a regionally consistent model of traffic conditions in the six-county SCAG region and serves as the platform for many sub-area models. As part of the MP 2035, the socioeconomic data for the City's TDF Model were updated to reflect the most recent growth forecasts in the 2012-2035 RTP/SCS (included in Appendix C). In addition, the roadway and transit networks were updated to reflect the assumptions contained in the 2012-2035 RTP/SCS (see **Appendix C**). Based on this, the City finds that it has provided the most up to date data using the best available methodology to study the project and cumulative impacts.

The EIR indicates that the proposed project would have a significant impact to the circulation system (**Impact 4.1-2**), as it would exceed the applicable threshold established by the City, and two Mitigation Measures **T1** and **T2** would reduce the level of impacts. However, the effect of Mitigation Measures **T1** and **T2** cannot be reasonably determined at this time and therefore the level of impact after mitigation remains significant and unavoidable impact with respect to delay and LOS of roadways within the City based on current thresholds of significance.

Because traffic models are substantially based on past precedent, state of the practice traffic modeling tools have not yet fully realized the potential mobility benefits of the planned transit system, expected increases in bicycling and pedestrian activity anticipated to result from State policy (Assembly Bill [AB] 32 and Senate

Bill [SB] 375), regional planning guidance (2012– 2035RTP/SCS) and updated City land use and transportation plans. See also **Master Response 22** regarding the level of detail analyzed in the EIR. The MP 2035 is part of the synergistic matrix of plans policies and regulations that are anticipated to foster a community that is less dominated by personal vehicles and more conducive to alternative work practices and alternative modes of transportation. However, this shift in focus, together with anticipated changes in energy pricing, will not occur over night, and it may be several years before the results of these societal changes are fully reflected in the mobility patterns of those that live and work in the City and reflected in the traffic models applied to forecast future travel and potential impacts.

The model-estimated changes in circulation system conditions are conservative; vehicle-centric estimates are based on historical travel behavior patterns and do not account for additional changes in demographics, vehicle ownership patterns, energy prices, and migration to walkable and transit-served locations that lead to decreasing vehicular volumes. Transportation demand models are largely dependent on historical travel patterns and mode choices when forecasting future traffic projections. Recent research in this area suggests that factors correlated with annual vehicle-miles travel (VMT) over the last 60 years include the economy, demographics, technology, and the urban form of the built environment. Specifically, this research shows both cyclical recession effects and a structural leveling of the economy and travel. In addition, research in areas served by high capacity transit shows significantly higher than expected transit ridership and lower than expected trip rates than typical Institute of Traffic Engineers (ITE) trip generation rates.²

The traffic model used for the proposed project is primarily validated and calibrated to forecast vehicular travel. While it also includes forecasts of transit ridership and short trips that are likely to be walking or bicycling trips, the sensitivity of the model to shifts in demographics, vehicle ownership, walkability, and active transportation networks at a city-wide scale is limited. Accordingly, expected increases in transit, bicycling and pedestrian activity anticipated to result from changing land use policies, as well as increasing regulations and fuel pricing, have not been directly quantified and incorporated into the traffic model and the reported increase in travel by alternative modes may be underestimated.

The MP 2035 reflects a conservative assumption of potential reductions in vehicular capacity from the Bicycle Lane Network. At a program level, the RDEIR provides a more comprehensive impact analysis of installing bicycle lanes. Bicycle lanes on corridors not designated as enhanced networks are assumed to require the conversion of a vehicle travel lane. Assuming that all bicycle lanes would require the conversion of a vehicular lane of travel in each direction is a worst-case assumption for vehicle impacts, and it is anticipated that some bicycle lanes can be accomplished by removing only one vehicle lane from the roadway or without removing any vehicle lanes. However, without specific roadway designs, it is not possible to determine at the city scale where bicycle lanes can be accommodated and, therefore, in the interests of providing a conservative analysis, all bicycle lanes are assumed to require the conversion of a vehicle travel lane.

As the Enhanced Network treatments are implemented over time, and the City's multi-modal facilities become more interconnected, visible and safer, it is anticipated that the nature of how and where we travel will change too. The MP 2035 is a long-range plan that is to be implemented over 20 years; it is designed to address the changing regulatory landscape (to decrease trip length, vehicle miles traveled, energy consumed and emissions — particularly GHGs in response to SB 375) and accommodate the growth anticipated for the City of Los Angeles. Even if energy sources were abundant and GHG emissions were not a significant challenge, it is not feasible to continue to widen existing corridors to accommodate ever increasing numbers of single-occupancy vehicles. The MP 2035 provides a transportation planning framework to accommodate all anticipated changes.

²Boarnet, Marlon J., Andy Hong, Jeongwoo Lee, Xize Wang, Weijie Wang. The Exposition Light Rail Line Study A Before-and-After Study of the Impact of New Light Rail Transit Service. *USC Sol Price School of Public Policy*. 59-61, 2013.

In response to increased focus on reducing GHG emissions, the State is shifting the approach to the assessment of traffic impacts – away from the traditional metrics, such as LOS, that measure levels of traffic congestion and towards metrics that address GHG emissions such as per capita VMT. As discussed in the Draft EIR, the Governor’s Office of Planning and Research (OPR) has developed preliminary guidance for CEQA review of transportation impacts that focuses on VMT rather than vehicle delay.³ Since this guidance is not yet defined, the transportation analysis in this document relies on the legal context and policy framework in place at the time of project initiation. It is likely that impacts related to vehicular delay and LOS that are considered significant under the current legal and policy framework would no longer be considered significant if analyzed using the new criteria.

Master Response 2: Conversion of Vehicular Travel Lanes to Bicycle or Transit Lane and Impact on Businesses, Community Character and Quality of Life

Comments received on the Draft EIR and RDEIR expressed concerns regarding the potential for the proposed improvements in the project, such as the conversion of vehicle lanes to bicycle or transit lanes, to adversely affect businesses and residents such that the quality of life of adjacent neighborhoods would be impacted. Potential cut-through traffic impacts on residential streets are addressed in **Master Response 18**. CEQA does not require the evaluation of quality of life as a separate topic distinguished from the physical environmental impacts listed in CEQA Appendix G. Quality of life is a subjective topic that is a combination of factors evaluated in CEQA documents (aesthetics, air quality, land use, noise, traffic). Issues likely to alter the character of communities are analyzed in **Section 4.2 Land Use and Planning** of the RDEIR under **Impact 4.2-1** (page 4.2-27 of the RDEIR) regarding the potential to result in a division of a community. CEQA also does not require the analysis of effects to businesses unless such changes lead to a secondary physical effect, such as blight. **Section 4.2 Land Use and Planning** of the RDEIR, **Impact 4.2-1**, also evaluates the potential for secondary effects to businesses.

The MP 2035 is intended to facilitate circulation throughout the region and encourage multi-modal travel. This facilitation of movement occurs by establishing different modal networks that are sited in locations with compatible land use. For example, establishing bicycle lanes in locations that connect with transit stations is key to providing multimodal connectivity and reducing the need for vehicular travel to transit stations. With implementation of the proposed project, the conversion of travel lanes into bicycle lanes in targeted areas would result in increased bicycle trips as a percentage of total trips, resulting in reduced vehicle trips. The replacement of travel lanes with bicycle lanes would create a safer environment where the potential conflict between bicyclists, pedestrians and vehicles would be reduced through the elimination of shared lanes and pedestrians being located further from vehicles.

As discussed in the Draft EIR (see **Section 6.1 Cumulative Impacts**), the City is undertaking a number of complementary land use planning activities, to encourage a mix of land uses and high-quality urban design. A growing body of literature points to the benefits of improved urban design for more walking and bicycling in cities, such as New York, Denver, Omaha, Minneapolis, Seattle, Portland, Vancouver, and Toronto.⁴ The literature states that more walking and bicycling activity spurs community interaction and economic activity and fosters better health outcomes.⁵ The primary environmental benefits of reduced vehicular travel are related to decreased emissions, and energy efficiency, which promote sustainable communities. In addition, an increase in multi-modal transportation would result in more physical activity, which is also beneficial to health. Decreases in congestion provide shorter travel times, and provide additional time for communities to partake in leisure and cultural activities, which further support individual and collective well-being. Getting people out of vehicles also promotes more local circulation, which increases the potential for social interaction and the development of a sense of community. All of these indirect effects of a robust multi-

³Office of Planning and Research, *Updating Transportation Impacts Analysis in the CEQA Guidelines, Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743*, August 6, 2014.

⁴Delaware State Department of Transportation, *Property Value/Desirability Effects of Bike Paths Adjacent to Residential Areas*, November, 2006.

⁵Sztabinski, F., *Bike Lanes, On-Street Parking and Business. A Study of Bloor Street in Toronto's Annex Neighborhood*, 2009.

modal transportation network protect human health and the natural environment, leading to higher quality of life.

Recent studies in San Francisco, Toronto, Portland, Austin, Chicago, and Washington D.C. also have found that the reconfiguration of transportation right-of-ways in favor of bicycle lanes have had no adverse effect on local businesses.^{6,7,8} Many businesses surveyed during these studies asserted that the bicycle lanes had a positive influence on business activity through traffic calming, the ability to accommodate more capacity to shop simultaneously (since vehicles require more parking space than bicycles), and evidence that bicyclists are more likely to be able to stop and support local businesses more conveniently. Surveyed businesses also found that customers arriving by car are likely to spend less and are also less frequent visitors than pedestrians and bicyclists. Those surveyed often had initial reservations about the opposite effect prior to implementation.

Based on the nature of the proposed transportation improvements, it is not anticipated that substantial changes to community character would occur to the extent that there could result in a division to a community (see discussion of **Impact 4.2-1** page 4.2-27 of the RDEIR). While significant traffic and noise impacts have been determined to occur as a result of the project (see discussion of **Impacts 4.1-1** and **4.5-1** pages 4.1.32 and 4.5-8 respectively in the RDEIR), when analyzed in the context of the potential to disrupt community character and divide a community, they are not significant. As stated on page 4.2-30 of **Section 4.2 Land Use and Planning** of the RDEIR, the proposed mobility “enhancements would not substantially change the function or purpose of the transportation infrastructure, which could potentially affect the character, access, or composition of surrounding communities. Therefore, the loss of existing travel lanes is not anticipated to isolate or divide communities or result in an incompatibility with surrounding land uses.” While trips could increase in some neighborhoods, the added traffic would not be inconsistent with traffic volumes in other residential areas of similar character in the City of Los Angeles and would not result in disruptions to residents that are beyond those anticipated for residential neighborhoods in a city the size and character of Los Angeles. Noise levels would not be incompatible with the residential use; safety would not be substantially altered and so on. With regard to local businesses, in many cases a large portion of a local merchant’s customer base derives from local community members. The proposed improvements would provide enhanced accessibility for non-vehicular modes of transportation, which would increase accessibility to residents that live in close proximity to local goods and services. On a similar note, it is not anticipated that large-scale, “big-box” stores, would systematically replace local businesses due to the large parking area requirements that are necessary to sustain this type of business model. It is not anticipated that the proposed project would directly or indirectly lead to land use changes that could alter the character of existing communities resulting in a significant impact related to division of a community.

Master Response 3: Loss of On-Street Parking to Additional Travel lanes and Impacts to Businesses

Comments received on the Draft EIR and RDEIR expressed concerns regarding the potential loss of parking and potential to impact adjacent businesses. For the purpose of analyzing impacts of the MP 2035, implementation of the Bicycle Enhanced Network (BEN) and Transit Enhanced Network (TEN) were assumed to result in the conversion of a vehicular travel lane to a bicycle or transit lane. The conversions, in general, are not anticipated to result in the removal of on-street parking. However, implementation of the Vehicle Enhance Network (VEN) does include a scenario whereby on-street parking could be converted to vehicle travel lanes during peak periods in the case of the Moderate-treatment options and during the full day in the case of Comprehensive-treatment options, to the extent that on-street parking currently exists along those sections. The implementation of these changes would not automatically occur as a result of adoption of the MP 2035. The MP 2035, as a long-range policy document, establishes the policy foundation upon which future mobility decisions are made. The Draft EIR identifies the environmental impacts (using existing

⁶City of San Francisco, *Polk Street Bicycling Study Report*, 2011.

⁷Toronto Cycling Think & Do Tank, Cyclists, *Bike lanes and On-Street Parking: Economic Impacts*, November 2013.

⁸Portland State University, *Lessons from the Green Lanes: Evaluating Protected Bike Lanes in the US*, May 29, 2014.

thresholds of significance identified in the CEQA Guidelines, Appendix G and City of Los Angeles CEQA Thresholds Guide as appropriate) that could occur as a result of those policies, but the implementation of the MP 2035 is not a foregone conclusion and may consist of a subset of the full range of mobility improvements evaluated in the Draft EIR. The decision to implement specific mobility improvements, such as to remove a travel or parking lane, as the precursor to installing alternative mobility facilities (protected bicycle lanes, bus only lanes, parklets, bicycle corrals, etc.) would be determined, (based on historical City practice, required engineering standards, policies in the MP 2035 and CEQA), only after detailed design, further study and coordination with the community and the City's leadership. MP 2035 includes Policy 4.4, "[c]ontinue to support the role of community engagement in the design outcomes and implementation of mobility projects," and Policy 4.5, "[f]acilitate communications between citizens and the City in reporting and receiving responses on non-emergency street improvements."

The MP 2035 EIR further identifies and describes the potential physical environmental impacts of the loss of on-street parking on the VEN in **Section 4.1 Transportation, Parking, and Safety** (see page 4.1-48), and **Section 4.2 Land Use and Planning** (see Impact 4.2-1) of the RDEIR. CEQA does not require that socio-economic concerns be addressed unless they could lead to physical environmental impacts. However, environmental documents must address the secondary physical impacts that could be triggered by an economic or social effect. The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impacts, such as increased traffic congestion or diverted traffic or land use impacts if the scarcity of parking could result in the displacement of businesses such that the area deteriorated leading to economic blight.

The proposed project, when fully implemented, would result in a loss of parking spaces that could increase VMT if people drive farther to find parking or seek an alternate destination with more convenient parking. However, based on observations of City planning and DOT staff, where parking has been removed in the City, it is expected that this increased VMT would typically be off-set by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area. The MP 2035 implementation timeline is generally synchronized with a greater availability of parking management services, such as online parking applications (apps) that identify in advance available parking supply in a given area. For example, the Los Angeles Department of Transportation has already made available several apps, Parker™ and ParkMe that indicate parking availability in locations served by the LA Express Park™ program. In addition, car share and ride share services are demonstrating an attractive mobility option that improves access to destinations without the necessity for parking. Hence, any secondary environmental impacts that could result from a shortfall in parking are anticipated to be minor; the transportation analysis reasonably accounts for potential secondary impacts. Therefore, the proposed project would result in less-than-significant traffic impacts related to loss of on-street parking.

The proposed project is not anticipated to permanently prevent or disrupt access to surrounding land uses, such as businesses located along VEN routes where on-street parking would be eliminated. The loss or limitation of parking could result in an indirect impact to land uses by reducing the availability of parking for some uses. However, as indicated in the Draft EIR, while parking could be difficult for some uses, the change in parking availability at the proposed scale contemplated, would not be sufficient to result in a significant impact to the land use.⁹ Areas with higher land values are less likely to remain vacant after individual businesses leave over time due to higher demand.¹⁰ Retail land is typically more valuable in larger cities that have extensive public transportation and high population densities to support retail development. In 2014, the cost of retail property per square foot within the City of Los Angeles was approximately 24 dollars per square foot compared to 16 dollars per square foot as the national average.¹¹ In 2014, the retail vacancy within the City of Los Angeles was 4.8 percent, well below the national average of approximately

⁹Marcus & Millichap, 2014 *Real Estate Investment Research National Retail Report*, page 32, 2014.

¹⁰*Ibid.*

¹¹*Ibid.*

ten percent.¹² The existing environment is well developed with little vacant or under developed land, which suggests that the demand for commercial business activity is high. As indicated in **Section 4.2 Land Use and Planning** (Impact 4.2-1), while individual businesses could be impacted (a socio-economic impact), the inconvenience in loss of on-street parking is not anticipated to lead to the permanent displacement of business leading to blight or physical degradation of any area. The City has implemented peak-period parking restrictions in areas throughout the City to increase peak-hour travel capacity or improved travel time performance for transit, and retail uses along these areas continue to thrive in spite of limited parking restrictions. Examples of this include the La Cienega Commercial Corridor, and Wilshire Boulevard in the Koreatown neighborhood where Los Angeles County Metropolitan Transportation Authority (Metro) recently implemented the first phase of Wilshire Bus Rapid Transit (BRT). The RDEIR concludes that the impact to land use would be less than significant.

Notwithstanding, the conclusion in the RDEIR that impacts would be less than significant, the potential less than significant land use effects resulting from changes in parking are addressed by Mitigation Measure **LU1** in **Section 4.2 Land Use and Planning**:

“Prior to the decision to remove on-street parking, the City of Los Angeles shall meet with the affected business and property owners to discuss the potential for the removal of on-street parking to affect the economic viability of the affected businesses. The City shall identify parking replacement options to businesses that do not have off-street parking and would be substantially affected by the permanent removal of on-street parking.”

Implementation of Mitigation Measure **LU1** could include parking utilization surveys as part of the outreach process within close proximity to proposed NEN facility to identify the total availability of parking and facilitation to improve parking supply management. The City could also off-set parking losses by improving the management of parking to be retained through deployment of demand-based pricing, and availability of parking supply apps as described above. LA Express Park™ is the City’s demand-based parking program that has a goal of increasing parking supply by achieving a 10 to 30 percent on street parking availability throughout the day through variable pricing of on-street parking meters. Parking congestion decreased by 10 percent during the first six months of the LA Express Park™ pilot in Downtown Los Angeles.¹³

As discussed above, parking deficits are not a CEQA issue, but secondary physical impacts, which could result from such shortages, such as displacement and eventual blight, are impacts requiring CEQA analysis.¹⁴ The de-emphasis of parking was further defined in SB 743, which states that, “aesthetics and parking impacts of a residential, mixed use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” Effective January 1, 2014, the loss of parking alone for residential and commercial projects in urban infill areas within ½ mile of transit, separate from the physical impacts that parking loss could cause (such as noise and air quality impacts), is no longer considered in determining if a project has the potential to result in significant environmental effects. Based on the high retail land values and low vacancy rates within the City of Los Angeles described above, it is not anticipated that the loss of parking would lead to displacement and eventual blight. Therefore, no secondary impacts from the potential loss of parking are anticipated.

Master Response 4: Potential Air Quality Effects from Project

Comments received on the Draft EIR and RDEIR expressed concerns regarding the potential effects from air quality regarding increased congestion/delay and increased bus frequency and that VMT cannot provide enough information to characterize air quality effects.

¹²Beacon Economics, *City of Los Angeles: A Comparative Analysis and Forecast*, page 14, May 2014.

¹³Xerox. LA Express Park Case Study, City of Los Angeles Department of Transportation, 2013.

¹⁴*San Franciscans Upholding the Downtown Plan v. City and County of San Francisco*, 2002.

Air emissions are assessed in **Section 4.3 Air Quality** and **Appendix D** in accordance with the guidance and methodology established by the South Coast Air Quality Management District (SCAQMD). Localized operational emissions were assessed for carbon monoxide (CO) and toxic air contaminants (TACs), including diesel particulate matter. The air quality analysis is based on the traffic model used to analyze the MP 2035, known as the City of Los Angeles' Travel Demand Forecasting (TDF) Model (described in **Appendix C**). The model-estimated changes in circulation system conditions are conservative, vehicle-centric estimates based on historical travel behavior patterns and do not account for changes in demographics, vehicle ownership patterns, energy prices, and migration to alternate modes (pedestrian, bicycle and transit) that would lead to decreasing vehicular volumes. Transportation demand models are largely dependent on historical travel patterns and mode choices when forecasting future traffic projections. Recent research in this area suggests that factors correlated with annual VMT over the last sixty years include the economy, demographics, technology, and the urban form of the built environment. Specifically, this research shows both cyclical recession effects and a structural leveling of the economy and travel (i.e., VMT per person is decreasing). However, the conservative traffic model did not recognize these factors and, as such, are likely to overestimate the number of vehicle trips in the future with implementation of the MP 2035. In some cases, proposed enhancements could change lane configurations by removing travel lanes. Reducing the number of travel lanes would result in local traffic congestion, resulting in some signalized intersections worsening to LOS E or F.

As discussed in **Section 4.3 Air Quality**, although traffic volumes would be higher in Future with Project conditions, pollutant emissions from mobile sources are expected to be much lower due to technological advances in vehicle emissions systems combined with normal turnover in the vehicle fleet. This is evident in the California Air Resources Board (CARB) EMFAC2014 emissions inventory model. According to the EMFAC2014 User's Guide (December 30, 2014), the model is used to support regulatory and air quality planning efforts. EMFAC2014 can be used to show how California motor vehicle emissions have changed over time and are projected to change in the future. The model also reflects the emissions benefits of the CARB recent rulemakings, including on-road diesel fleet rules, Advanced Clean Car Standards, and the Smartway/Phase I Heavy Duty Vehicle Greenhouse Gas Regulation. Running the model for successive years shows that criteria pollutant emissions rates generally decrease in each successive year. Future with Project emissions would be less than Existing emissions (echoing reductions in VMT), and would not exceed the SCAQMD significance thresholds. Therefore, the proposed project would result in a less-than-significant impact related to regional emissions.

Although the impacts to regional emissions would be less than significant (i.e., less than existing) and would not cause an exceedance of SCAQMD standards, the RDEIR concluded (based on its vehicle-centric traffic modeling and conservative assumptions) that the Future With Project scenario could result in higher nitrogen oxides (NO_x) and volatile organic compounds (VOC) emissions and a decrease in CO, particulate matter 2.5 microns or smaller in diameter (PM_{2.5}) and particulate matter 10 microns or smaller in diameter (PM₁₀) emissions compared to the Future No Project scenario. Future With Project emissions when compared to Future No Project emissions would decrease for carbon monoxide (CO), PM_{2.5}, and particulate matter 10 microns or smaller in diameter PM₁₀ but increase for VOC (1.6 percent) and NO_x (2.6 percent). The increase is due to the traffic distribution between surface streets and freeways. Under the proposed project, freeway VMT increases by 3.3 percent and surface street VMT decreases by 8.3 percent. The VMT-weighted average speed for surface streets and freeways are calculated as 21.57 and 25.88 for Future No Project and as 20.69 and 25.89 mph for Future with Project, respectively. The small increase in freeway-weighted average speed implies that the freeway emissions (not emissions rates) are mainly a function of VMT and not emissions factor of pollutants, since the emission factors only change with change in speeds. Since the freeway VMT increases and speeds hardly change, the freeway NO_x and VOC increase.

Surface street emissions are discussed on page 4.3-22 of the RDEIR. Surface street emissions, unlike freeway emissions, are a function of both VMT and speed. According to the traffic analysis prepared for the proposed project using TransCAD Version 4.8 Build 500, City VMT weighted average speeds decrease from

21.57 to 20.69 mph, equivalent to approximately 4 percent project-wide speed change. The model output is in the form of vehicle miles traveled in five mile per hour increments. These increments are referred to as speed bins (e.g., 20 to 24.9 mph). The speed change was calculated using the total VMT in each speed bin. A standard EMFAC2014 modeling run indicates that a decrease in the speed of traffic by only 5 mph from 25 to 20 mph increases the average fleet PM_{2.5} and PM₁₀ emissions by approximately 2.4 and one percent, while increasing the NO_x and VOC emission rates by approximately 40 and 26 percent, respectively. Therefore, compared to PM₁₀ and PM_{2.5} an increase in VOC and NO_x emissions at these low speeds is significant. While the Future With Project surface street VMT decreases compared to the Future No Project VMT, the decrease in emissions would not be able to compensate for the huge increase in emissions due to decrease in speeds. Therefore, the overall effect is an increase in NO_x and CO emissions and decrease in PM_{2.5} and PM₁₀ emissions.

The RDEIR analyzed pollutant exposure from MP 2035 associated with roadway widening, reduced capacity, lane conversions, bicycle riders, and diesel emissions and concluded that they would be less than significant in all air quality impact areas. These issues are summarized below:

Roadway Widening. The majority of the proposed new street designations (see **Table 3-3** in **Chapter 3.0 Project Description**) minimize the amount of street widening that will occur in the future to accommodate vehicular travel and preserve more ROW for wider sidewalks. Roadway widening would be associated with increased sidewalk widths such that sensitive receptors would be no closer to the travel lane than existing or could become further away. The analysis of the transportation network generally assumes that implementing the BEN and TEN would result in the conversion of vehicle travel lanes, not on-street parking, to bicycle or transit lanes. Implementation of the VEN does include conversion of on-street parking to vehicle travel lanes in the case of the moderate-treatments. CARB has published the Air Quality and Land Use Handbook: A Community Health Perspective (April 2005) guidance related to the location of sensitive receptors near high volume roadways. The guidance states that sensitive land uses should not be located within 500 feet of urban roads with traffic volumes equal to or greater than 100,000 vehicles per day. None of the roadways with proposed lane conversions have either existing volumes equal to or greater than 100,000 vehicles per day or future volumes with the lane conversion equal to or greater than 100,000. Based on the Air Quality and Land Use Handbook guidance, conversion of parking lanes to travel lanes would not significantly increase exposure of sensitive receptors to pollutant concentrations. While vehicular travel in a parking lane would bring emissions incrementally closer to some sensitive receptors, the change would not result in a significant impact to adjacent sensitive receptors because 1) the volumes would be below the 100,000 vehicle per day threshold of concern identified by CARB, and 2) emission controls continue to substantially reduce emissions in successive years (EMFAC2014).

Reduced Capacity. 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 (Although in some cases where capacity is reduced, the number of vehicles passing through an intersection during peak hours could decrease, which could lead to peak period being extended). Increased localized CO 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. As discussed in Section **4.2 Transportation, Parking and Safety**, many roadway segments affected by the proposed project 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.

Even if the incremental change in traffic volumes or vehicle idling emissions would be considered significant, existing ambient carbon CO levels are extremely low within the Basin. 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. As shown in **Table 4.3-2** of the RDEIR, the one-hour concentration is typically 3 ppm and the 8-hour concentration is typically 2 ppm according to monitoring data. The State and federal 1-hour standards are 20 and 35 ppm, respectively (see **Table 4.3-2**).

The State and federal 1-hour standards are 9.0 and 9 ppm, respectively (see **Table 4.3-2**). According to California Air Resources monitored data, no CO standard has been exceeded in the Basin since 2002 (CARB, Air Quality Data Statistics, <http://www.arb.ca.gov/adam/index.html>, accessed May 6, 2015). The Basin is designated as a maintenance area for CO which means both State and federal air quality standards are satisfied.

To trigger an impact, CO 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 in over an 8-hour period. Because of the low ambient CO condition, even where speed on average street segments could be reduced to almost zero, the resulting CO emissions would only increase by a factor of two. In addition, none of the intersections affected by the MP 2035 contain the requisite vehicle volumes and delays to generate a CO hotspot. Under the most extreme circumstances, 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.

This conclusion was demonstrated through a localized pollutant concentration analysis for a typical City street with a volume approaching 35,000 vehicles per day (La Brea Avenue between Beverly Boulevard and 6th Street). Traffic counts from the City of Los Angeles Department of Transportation for the City of Los Angeles (2011-2012) indicate that this street volume is reflective of the type of segment that could result in reduced capacity/increased congestion from vehicular lane conversions on the BEN and TEN. Traffic volumes under the other BEN and TEN segments are less than or approximately equal to this segment. The analysis was completed using the CARB CALINE4 model and assuming that peak hour traffic is commonly ten percent of average daily traffic. The highest hourly delay at this intersection was assumed to be 215 seconds per vehicle during the AM peak hour (based on modeling performed for a bicycle lane). It was assumed that these vehicles would travel five miles per hour during the delay period creating a constant 0.3-mile emissions source. The results of the analysis and applicable standards in **Table 4.3-15** of the RDEIR show that the pollutant concentrations would be well below the established 1-hour threshold of 20 ppm (3.5 ppm) and 8-hour CO thresholds of 9.0 ppm (2.6 ppm).

As shown above and discussed on page 4.3-26 of the RDEIR, the results show that the significantly increased delay along a typical City street would not cause an exceedance of the applicable standards. CALINE4 does not model O₃ concentrations. NO₂ is a precursor to O₃ and NO₂ concentrations show the potential for increased localized ozone concentrations. In addition, CALINE4 presents PM emissions in parts per million which cannot be compared to the State standards listed in micrograms per cubic meter. The CO and NO₂ concentrations are well below the standards (see **Tables 4.3-3** through **4.3-5** beginning on Page 4.3-12 of the RDEIR) and local roadways are mostly traveled by gasoline powered vehicles. According to EMFAC2014, these vehicles emit less particulate matter than diesel powered vehicles. In addition, particulate matter generated by tire wear would not increase because traffic volumes would not increase. Similar to the analysis of modeled pollutants, it is not anticipated that particulate matter emissions would be significant.

Lane Conversions. Peak-hour traffic speeds on the roadway network would change where lanes would be converted to transit or bicycle lanes, which could affect truck emissions on those roadways. It is possible that emissions would increase along roadway segments where speeds have been reduced. The CARB Air Quality and Land Use Handbook uses 100,000 vehicle per day as a screening threshold for assessing sensitive receptor exposure near roadways. The SCAQMD has not published guidance related to a mobile source health risk assessment associated with surface streets. None of the roadways with proposed lane conversions have either existing volumes greater than 100,000 vehicles per day or future volumes with the lane conversion of 100,000 or greater. Therefore, while vehicle emissions may increase along certain roadway segments, the traffic volumes are not considered high enough to generate a new health risk or significantly increase exposure. Therefore, the proposed project would result in a less-than-significant impact related to operational toxic air contaminants (TACs).

Bicycle Riders. Bicycle riders using new bicycle lanes on high-volume roadways would be exposed to higher pollutant concentrations than riders that use neighborhood routes. However, it is anticipated that

bicycle lanes would allow riders to quickly traverse congested areas. Recent exposure concentration studies for particulate matter and CO exposure on different modes of surface transportation (walking, cycling, bus, car and taxi) have been analyzed in urban environments. The studies reveal that pedestrians and cyclists experience lower fine particulate matter and CO exposure concentrations in comparison to those inside vehicles (the vehicle shell provides no protection to passengers).¹⁵ Additional studies have analyzed the differences in exposure for bicyclists and vehicles for other pollutants, including benzene, toluene, ethylbenzen, and xylene. The concentrations of these pollutants inside vehicles were 2 to 4 times greater than in the breathing zone of cyclists. Therefore, even when factoring in the increased respiration rate of cyclists, passengers in vehicles are exposed to a greater concentration of pollutants than cyclists.¹⁶ These studies have all found that proximity to the pollutant sources has the most significant effect on exposure concentration levels experienced.¹⁷ Therefore, any increased distance to the vehicle lanes, such as protected lanes, would be effective in reducing potential health effects. In addition, as described above (**Table 4.3-15** on page 4.3-26 of the RDEIR and the associated discussion), peak hour pollutant concentrations would be less than State Standards and exposure would not exceed applicable standards.

Diesel Emissions. The greatest exposure concern to TACs is associated with diesel emissions. The majority of buses operating within the City of Los Angeles are powered by alternative fuels. For example, the entire bus fleet operated by the Metro, and other bus operators, are powered by compressed natural gas. The last diesel bus operated by Metro was retired in 2011.¹⁸ It is not anticipated that increased bus service would substantially increase diesel particulate emissions. Regarding diesel emissions from trucks, it is possible that emissions would increase along roadway segments that become more congested as a result of the proposed project. The CARB Air Quality and Land Use Handbook uses 100,000 vehicle per day as a screening threshold for assessing sensitive receptor exposure near roadways. The SCAQMD has not published guidance related to a mobile source health risk assessment associated with surface streets. None of the roadways with proposed lane conversions have either existing volumes greater than 100,000 vehicles per day or future volumes with the lane conversion of 100,000 or greater. Therefore, while diesel emissions from trucks may increase along certain roadway segments, the traffic volumes are not considered high enough to generate a new health risk or significantly increase exposure.

Master Response 5: Potential Growth-Inducing Effects

Comments received on the Draft EIR and RDEIR expressed concerns regarding the potential for the proposed project to create additional congestion and demands for infrastructure through increased development. Comments cited the lack of analysis of growth-inducing effects on transit-based density enhancements and not allowing improvements without evaluating the associated infrastructure to support the improvements.

The purpose of the MP 2035 is to facilitate mobility changes to assist in balancing land use and transportation planning in order to reduce VMT and associated greenhouse gas emissions. The MP 2035 identifies a full range of options to meet mobility needs, including bicycling, carpooling, driving, transit, and walking. The MP 2035 establishes a policy foundation for safe, accessible and enjoyable streets for pedestrians, bicyclists, transit users, and vehicles alike. It would enhance the existing transportation network, generally limiting improvements to the existing rights-of-ways, and would not create conditions that would induce growth.

In accordance with Section 15125.2(d) of the CEQA Guidelines, the growth-inducing impacts of the MP 2035 are considered in **Section 6.3 Growth-Inducing Impacts**. Growth-inducing impacts are

¹⁵Kaur, Nieuwenhuijsen, and Colvile, *Fine particulate matter and carbon monoxide exposure concentrations in urban street transport microenvironments*, Atmospheric Environment, Volume 41, Issue 23, page 4781, July 2007.

¹⁶Rank, Folke, and Jespersen, *Differences in cyclists and car drivers exposure to air pollution from traffic in the City of Copenhagen*, Science of the Environment, Volume 279, Issues 1-3, page 131, November 2001.

¹⁷*Ibid.*

¹⁸Los Angeles County Metropolitan Transportation Authority, http://www.metro.net/news/simple_pr/metro-retires-last-diesel-bus, accessed April 22, 2015.

characteristics of a project that could directly or indirectly foster economic or population growth and/or the construction of additional housing, either directly or indirectly, in the surrounding environment. According to CEQA Guidelines, such projects include those that would remove obstacles to population growth (e.g., a major expansion of a waste water treatment plant). In addition, as set forth in the CEQA Guidelines, increases in population can tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects.

The CEQA Guidelines also state that it must not be assumed that growth in an area is necessarily beneficial, detrimental or of little significance to the environment. Generally a project is considered to result in growth-inducing effects if it causes one or both of the following:

- The extension of infrastructure (sewer, water, roadways, etc.) to an area currently undeveloped and/or lacking adequate infrastructure; and/or
- The provision of housing or employment to an area currently undeveloped or lacking in adequate housing or employment.

The proposed enhancements in the MP 2035 would not develop residential uses nor would they substantially increase capacities of existing infrastructure¹⁹, and, therefore, would not induce substantial population growth in the MP 2035 plan area, either directly or indirectly. The proposed enhancements include the development of bicycle and transit lanes and other street improvements to address pedestrian needs and safety. The MP 2035 would not extend infrastructure to undeveloped areas or areas lacking adequate infrastructure. Rather, the MP 2035 would enhance the existing transportation network by providing for all modes of transportation to serve existing land uses consistent with the Complete Streets Act.

The provision of mobility improvements is planned to facilitate circulation and is consistent with the projected allocations of growth within the City that is identified in City's community plans and SCAG's SCS (a part of the 2012-2035 RTP/SCS). SCAG's SCS places greater emphasis on growth in the vicinity of transit infrastructure than has occurred in the past. The 2012-2035 RTP/SCS evaluates the impacts of the overall proposed growth pattern in the region. The emphasis of growth occurring in "centers" and in the vicinity of transit has long been anticipated in City planning documents. The proposed mobility enhancements in the MP 2035 are intended to support the growth patterns identified in these planning documents. To the extent that the MP 2035 facilitates the projected growth identified in regional and community plans, the impacts are expected to result in generally reduced regional impacts to air quality and greenhouse gases. See **Table 4.2.3** in **Section 4.2 Land Use and Planning** for additional details regarding the benefits of the MP 2035.

Master Response 6: Public Participation

Several of the comments have questioned the adequacy of public participation provided on the MP 2035 and/or the EIR. The City has complied with and exceeded all requirements under CEQA to provide notice and opportunities to comment on the EIR. These include the following:

Pursuant to CEQA Guidelines Section 15082, a Notice of Preparation (NOP) for the Draft EIR was issued on April 4, 2013 for a 30-review period. A total of 33 comment letters were received. Information, data and observations resulting from these letters were included throughout this Draft EIR, where relevant. Two public scoping meetings were held on April 16 and 22, 2013. The purpose of these meetings was to provide early consultation for the public to express their concerns about the proposed projects, and acquire information and make recommendations on issues to be addressed in the Draft EIR.

A Notice of Availability for the Draft EIR was filed with the State Clearinghouse, published in the newspaper, mailed to relevant agencies, and the Draft EIR was circulated to the public for 90 days (February 13, 2014 to May 13, 2014). Hardcopies of the Draft EIR were made available at nine libraries, City Hall, and the Van Nuys Civic Center, and an electronic version was made available on the City website.

¹⁹**Tables 4.1-19 and 4.1-20** compare Future No Project to Future With Project LOS and generally show that vehicle delay would be worse with the project than under No Project conditions.

Over 300 participants attended a series of seven public hearings were held in different locations throughout the City and provided verbal and written comments on the Draft EIR. Approximately 41 letters contained comments on the Draft EIR.

A Notice of Availability for the RDEIR was filed with the State Clearinghouse, published in the newspaper, mailed to relevant agencies, and to persons submitting comments on the previous Draft EIR. The Draft EIR was circulated to the public for a 45-day public review period (February 19, 2015 to April 6, 2015). Hardcopies of the Draft EIR were made available at nine libraries, City Hall, and the Van Nuys Civic Center, and an electronic version was made available on the City website. During the review period, 152 written comment letters were received on the RDEIR from public agencies, groups, and individuals.

As to public participation on the MP 2035, the City made public participation an integral component to the Plan's process. City staff undertook community outreach efforts that contributed to the framing of the goals, objectives, policies, and programs of the MP 2035.

Community participation and feedback were critical to forming the direction of the MP 2035. An open public dialogue was integral to each step of the planning process, from visioning and analyzing to goal and policy formulation.

The MP 2035 is a citywide document and community outreach for a city as large and spread out as Los Angeles is a complex undertaking. A strategic approach was used to engage citizens at the community level in order to inform and engage the public concerning the anticipated issues at a citywide level.

Since the inception of the MP 2035 in the Fall of 2011, City staff have participated in over 90 community meetings throughout the City, held four "think lab" workshops, two scoping meetings, maintained a project website for easy access to materials, implemented an online town hall to hear from those unable to go to traditional meetings, and worked with various agencies, nonprofits, and community groups.

The proposed project has solicited public involvement through the following activities:

Project Website, LA2B.org: This has been the main source of information for the MP 2035, providing regular updates on the status of the plan. From the website, the public has been able to download important documents released during the development process and become more informed about the analysis behind each step by reading project updates. Website visitors can read about the project, learn how to get involved, and contact planning staff online to give their comments.

Online Town Hall: As an experimental effort and new way of expanding the number and diversity of stakeholders, the MP 2035 contracted the services of MindMixer and introduced an online town hall through ideas.la2b.org. This online format provided an opportunity for community members to share thoughts and opinions about the streets of Los Angeles. The virtual town hall has allowed for a wider range of citizens to participate outside of traditional workshops and focus groups. The largest participant group was in the 25 to 45 age range. In addition, participants were represented from 79 of the 108 (73 percent) zip codes associated with the City of Los Angeles, as well as additional participants from Culver City, Long Beach, Pasadena, Santa Monica, and the South Bay. The online format also allowed staff to identify geographical areas where there was limited participation and focus additional outreach efforts in those communities.

Neighborhood Councils: To ensure widespread distribution of information, materials were disseminated at the Council District and Neighborhood Council levels. The Project Team worked with the Department of Neighborhood Empowerment and Council staff to reach out to the community on a citywide scale.

"Great Streets, Great Neighborhood" Activity Kit: To obtain participation on an overarching citywide scale, an activity kit was sent to over 100 Neighborhood Councils and civic organizations. This pen-and-paper activity, with a 25 percent response rate, was meant to supplement the dialogue of the online town

hall and included a series of brief exercises to help give input toward the development of the proposed goals, objectives, policies, and programs of the MP 2035.

Task Force: The Mobility Task Force was put into place to guide this citywide effort and community-wide discussion. The Task Force played a pivotal role in assisting the City to generate significant engagement and input for the plan. Over 50 organizations were invited, including, community groups, nonprofits, major transit providers, and civic, business, and environmental transportation leaders throughout the City. The Task Force met six times during key phases of the project to provide input and guidance on plan development.

Technical Advisory Committee: The Technical Advisory Committee consisted of representatives from city departments and other relevant government organizations that have a stake in transportation. The Technical Advisory Committee met monthly from 2011 to 2013 to review transportation issues and opportunities within the City of Los Angeles.

Public Workshops: In early 2012, the Departments of City Planning and Transportation held community workshops in different neighborhoods across the City: Van Nuys, the Miracle Mile, Downtown, and Pacoima. These workshops were named “Think Labs” and encouraged participants to explore the existing Los Angeles mobility system through a gallery of maps that conveyed key information about the City’s streets and demographics. Community members also shared ideas that complemented those submitted onto LA2B’s online Town Hall.

Scoping Meetings: The environmental analysis of the plan required a scoping period to receive input from the public and other agencies on what should be studied in the EIR. Two scoping meetings, held in the spring of 2013, focused the analysis around the potential impacts and benefits of the proposed enhanced networks.

Community Planning Forums and Staff Level Public Hearings: The proposed MP 2035 and Draft EIR were both released February 2014 for a 90-day public comment period. Over 300 participants attended a series of seven community planning forums and staff-level public hearings were held at each forum. Resources were pooled together with The Plan for A Healthy Los Angeles and Re:code LA to expand the Plan’s reach to a broader audience and allow contributors to participate at one location in three related long-range planning efforts being led by City Planning.

Master Response 7: Framework Element

Several comments have questioned the relationship of the MP 2035 to the Framework Element of the General Plan and the associated regulatory requirements. Some of these comments have argued that the MP 2035 is inconsistent with the Framework Element (including based upon local court decisions, including *Saunders v. City of LA* and *Fix the City v. City of LA*) and that the EIR fails to comply with CEQA in its analysis of impacts on the environment, particularly infrastructure. Specifically, these commenters have argued that the EIR was required to identify all existing deficiencies to adequately assess the project’s impacts.

Plan Consistency

The City disagrees that the MP 2035 is inconsistent with the Framework Element, including but not limited to Land Use Policy 3.3.2 and Programs 42 and 43 contained therein, because the MP 2035 is not a land use plan. The cases cited by some of the commenters, cited above, are inapposite to the facts in the present circumstances because this is not the adoption of a community plan. The MP 2035 is a policy plan intended to facilitate movement within a mature urban area as growth continues. As discussed in **Master Response 5**, the MP 2035, in and of itself, does not induce growth. It accommodates anticipated infill or density-related growth as envisioned in the General Plan Framework (Framework) and analyzes the potential effects of the proposed transportation improvements at the Area Planning Commission (APC) level. The environmental

review of the MP 2035 ensures that decision-makers are made aware of unintended consequences from the proposed multi-modal transportation policies and actions.

The MP 2035 would replace the current 1999 Transportation Element; it is intended as the transportation blueprint for the City of Los Angeles. For the City of Los Angeles, the Transportation Element together with the long-range planning documents from operational departments (including Los Angeles World Airports, Port of Los Angeles, Department of Water and Power, Department of Public Works) provides compliance with Government Code Section 65302 (b) which requires that a general plan include a circulation element consisting of the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, and other public utilities and facilities, all correlated with the Land Use Element of the General Plan. See also the discussion of the Circulation Element in **Master Response 16**.

The MP 2035 seeks to improve transportation infrastructure given projected growth through the year 2035. This transportation infrastructure planning would not change, or encourage changes in, land use density. Rather, Policy 3.3 of the MP 2035 promotes land use decisions that result in fewer trips by providing greater proximity and access to jobs, destinations and other neighborhood services. In this way, the MP 2035 supports a framework of growth that reduces demand on infrastructure that is currently a result of longer distance trip patterns.

CEQA Impacts

The potential for the project to impact public infrastructure must come from some identifiable (1) growth inducing impact, (2) direct impact or (3) indirect impact from the implementation of the project. No such impacts exist for the following reasons:²⁰

- The project is not growth inducing as discussed in **Master Response 5**.
- The project has no direct impacts on public infrastructure because the project itself is not a construction project. The project, as described above, does not mandate the construction or improvement of any street, improvement or public facility in particular. The project creates an aspirational plan for where improvements could be reasonably made to the City's existing transportation network that support the project's identified goals and objectives.
- The project does not have reasonable foreseeable indirect impacts on public infrastructure. There is no connection, and the commenters have not shown any, between planning for the build-out of the proposed BEN, VEN, TEN and NEN and any adverse impacts to public infrastructure. To the extent the City would install improvements to implement the MP 2035, it is reasonably foreseeable the infrastructure in the area (such as road treatments, sidewalks and curbs) would be improved from their present condition. In addition, the commenters have provided no substantial evidence supporting an argument that implementation of the project would cause adverse impacts to the City's existing public infrastructure. The only infrastructure MP 2035 may potentially implicate would be streets, sidewalks and other related infrastructure. Additionally, to the extent a particular project would be proposed to implement an aspirational component of MP 2035, this future decision would likely require additional environmental review in order to assess the site specific projects impacts that may affect existing public services and existing conditions in the project area, including degraded water pipes, sidewalks, etc. Identifying any potential impacts to such infrastructure at this point in time would be speculative at best. As such, identification of existing conditions of the infrastructure as called for by the commenters would serve no purpose for assessing the project's impacts is not required by CEQA.

Based on the above, the commenters arguments associated with the Framework Element and the adequacy of the EIR are not supported by the law or facts. However, to the extent these comments raise policy arguments they will be forwarded to the decision-maker for its review and consideration before project approval.

²⁰For further support regarding the project having no foreseeable impacts to City infrastructure see Comment R102-1 from the Los Angeles Bureau of Sanitation finding that the project is, "unrelated to sewer capacity availability."

Master Response 8: Goods Movement

Several comments related to the statutory need to address Goods Movement as part of the Circulation Element. The comments were requesting that the project provide policies to address goods movement impacts at their source, such as the Port of Los Angeles and LAX, designating truck routes, designate clean freight corridors and zero emission corridors. These comments expressed concerns related to consistency with adopted land use plans. The MP 2035 proposes no modifications to the Goods Movement infrastructure as identified in the 1999 Transportation Element (MP 2035 completely replaces the 1999 Transportation Element). Goods movement is reflected in the City's TDF model used to conduct the transportation impact analysis described in **Section 4.1 Transportation, Parking and Safety**. The Goods Movement map included in the MP 2035 (and analyzed in the EIR) includes reference to established truck routes (for trucks greater than three tons), the Alameda Corridor, rail yards, the Port of Los Angeles and both LAX and Van Nuys Airport. While the map is fairly limited in its scope, it is not to imply that there is not a more extensive network of corridors that trucks have available to them. Because goods movement is an important regional effort and the movement of trucks typically extends through multiple jurisdictions on a daily basis, the city participates in the regional planning efforts of SCAG and Metro to determine the more extensive truck system. The most recent Countywide Strategic Truck Arterial Network (CSTAN) effort was completed in 2014. Because the CSTAN is not adopted or maintained by the City it is not included on the Goods Movement map. The CSTAN identifies the arterials that are primarily used by trucks to access industrial uses from freeway facilities and includes 449 miles of arterials within the City of Los Angeles. Routes included on the CSTAN are prioritized for future funding and are promoted to the trucking industry as the region's designated truck routes. The CSTAN corridors are included in the City's TDF model; however, no specific changes to arterial operating conditions, such as increased vehicular capacity, are identified as part of the CSTAN.

Knowledge of streets that are frequented by trucks allows the city to ensure that design features incorporated into those streets are compatible with trucks while also meeting the needs of other modes (pedestrians, bicyclists, transit) that might be prevalent on a particular street segment. Goods movement (i.e., trucks traveling on City streets) is reflected in the travel demand forecasting model and roadway operations analysis conducted for the MP 2035. The volume-to-capacity (V/C) ratios reported from the City's TDF model (**Table 4.1-19** and **Table 4.1-20**) include the number of heavy vehicles traveling on the streets during the AM and PM peak hours. In addition, major goods movement generators, such as the Port of Los Angeles and LAX, are included in the land use forecasts contained in the travel demand forecasting model applied to the MP 2035.

Master Response 9: Funding and Implementation

While not related to a CEQA environmental topic area, several comments related to how the MP 2035 would be funded and implemented. This response was developed to address the uncertainty of available funding and timing for the implementation of the proposed mobility improvements.

The MP 2035 does not call for the direct implementation of a new tax or other type of fee increase, nor does the MP 2035 have identified funding allocated specifically for its implementation. Rather, the MP 2035 establishes a vision and strategy to guide future modifications to the City's transportation and mobility system. Decision makers will use the MP 2035 as a guide in allocating often scarce resource dollars when determining future mobility improvements. Implementation of the MP 2035 is in large part contingent upon the availability of adequate funding. There are a variety of federal, state, regional and local funding options that the City currently draws upon to maintain, operate and update its transportation system and street network. Funding is likely to change over time due to economic conditions and to fluctuations in the priorities of federal, state and regional funding agencies as well as the City of Los Angeles itself but the future allocation of these resources will be based upon the goals and policies of the MP 2035. None of the projects included in the MP 2035 can be implemented unless specific funding is made available. Should additional funding resources present themselves (e.g. adoption of an expanded Measure R sales tax), the policies and programs in the MP 2035 provide the foundation upon which to make decisions about continued funding allocations.

Based on the above, the MP 2035 does not include project-specific information and therefore detailed analysis of construction impacts and location-specific impacts cannot be undertaken at this time. CEQA requires that environmental documents identify reasonably foreseeable impacts caused by a project; changes that are speculative are not reasonably foreseeable and are therefore not required to be addressed [CEQA Section 15064(d)(3)].

Master Response 10: Westwood Boulevard

The City received a number of comments regarding the proposed Westwood Boulevard protected bicycle lane that was proposed in the Draft MP 2035 and potential impacts on traffic. A majority of the commenters believed that adding a bicycle lane would create detrimental traffic impacts for the neighborhood and local businesses. There were a few suggestions that the bike lane should be moved from Westwood Boulevard to residential streets or other parallel roadways. While potential traffic impacts were addressed in the Draft EIR in compliance with CEQA, the City decided to update the Plan in response to the comments received and the Plan updates for Westwood Boulevard were reflected in the RDEIR analysis. In consideration of the multiple transportation demands on Westwood Boulevard, now and in the future with the opening of Exposition Light Rail Phase II, the MP 2035 proposes to include Westwood Boulevard on the TEN while retaining existing short portions on the BEN (north of Santa Monica Boulevard to Le Conte Avenue). The TEN designation on Westwood Boulevard is proposed as a Moderate enhancement which would not remove a vehicle travel lane. Remaining portions of Westwood Boulevard would retain their existing bicycle lanes. Recognizing that all bicyclists may not be comfortable riding on the portions of Westwood Boulevard without a protected bicycle lane, streets parallel to Westwood Boulevard on the NEN could provide an option for bicyclists who desire a calmer bicycling environment.

Master Response 11: Development of the MP 2035

A number of comments related to the contents and level of detail of MP 2035 and associated impact analysis contained in the EIR. This response identifies how MP 2035 was developed, including legal requirements to respond to the Complete Streets Act, that necessitated the development of the MP 2035 as currently proposed and the future process for the evaluation of project-specific improvements.

As explained in **Section 4.1 Transportation, Parking and Safety** of the Draft EIR, planning in response to Climate Change has been underway for some time. In 2005 Executive Order (E.O.) S-3-05 set the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. In September 2006, the State passed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 focuses on reducing GHG emissions in California, and requires CARB to adopt rules and regulations to achieve GHG emissions equivalent to Statewide levels in 1990 by 2020. SB 375 was passed by the State Assembly on August 25, 2008 and signed by the Governor on September 30, 2008. SB 375 links regional planning for housing and transportation with the greenhouse gas reduction goals outlined in AB 32. Reductions in GHG emissions would be achieved by, for example, locating housing closer to jobs, retail, and transit. GHG reduction targets have resulted in regional and local agencies reprioritizing their transportation investments to ensure that people have access to transit and active modes of transportation in an effort to reduce dependence on vehicular travel and reduce VMT and associated GHG emissions.

The 2008 Complete Streets Act (AB 1358) mandates that when the circulation element of the General Plan is modified that it plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan. Compliance with the Complete Streets Act is expected to result in increased options for mobility; less GHG emissions; more walkable communities; and fewer travel barriers for active transportation and those who cannot drive such as children or people with disabilities. Complete streets play an important role for those who would choose not to drive if they had an alternative as well as for those who do not have the option of driving. The Complete Streets Act specifically

encourages an increase in non-driving modes of travel while also recognizing the value that streets play in facilitating the vehicular movement of goods and people.

On April 4, 2012, in response to these legislative actions, the Regional Council of SCAG adopted the 2012-2035 RTP/SCS. The 2012-2035 RTP/SCS provides a regional plan to meet region-specific GHG reduction targets. The 2012-2035 RTP/SCS identifies transportation corridors and transit routes, High Quality Transit Areas (HQTAs), and a variety of strategies to be employed across the region to link transportation and land use planning in order to reduce greenhouse gas emissions.

As part of its response to the Complete Streets Act and the 2012-2035 RTP/SCS, the City of Los Angeles initiated the MP 2035. The MP 2035 provides a City-wide coherent transportation plan that provides policy guidance upon which to base mobility decisions and funding allocations to meet the City's future transportation needs while also responding to the state-mandated requirements to reduce greenhouse gas emissions associated with transportation.

The MP 2035 is a mix of policies and conceptual-level improvements to the transportation network. Detailed roadway designs for improvements to individual roadways or corridors are not yet available. Therefore, the EIR analyzes impacts at an area-level of detail. For purposes of comparison of impacts between different areas of the APC boundaries were selected as the most appropriate scale to analyze the various issue areas considered in this EIR and to provide an APC-level assessment of impacts. As individual projects move forward they will be evaluated at a project level as appropriate.

Master Response 12: Project Alternatives

A number of comments expressed concerns regarding the lack of specificity of alternatives to the proposed project and that the alternatives analysis does not include a reasonable range including an alternative that focuses on reducing congestion instead of increasing bicycle, transit and pedestrian uses. Other commenters argued for other types of alternatives, including alternative that identified different streets as part of the enhanced networks, alternatives that considered other types of interventions that promote reduction in vehicle trips, and alternatives that implemented more aggressive promotion of bicycle and pedestrian uses.

Purpose of the Project

Reducing congestion is not a goal of MP 2035. As discussed above, MP 2035 is intended to implement the Complete Streets Act. As stated in **Chapter 3.0 Project Description** of the RDEIR, the goals of the proposed project are to ensure safety, provide transit infrastructure, provide access to transportation for all citizens, to provide collaboration, communication, and transparency in decisions, and to support a clean environment. These goals are consistent with the Complete Streets Act, which mandates that the circulation element of a General Plan be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan. Compliance with the Complete Streets Act is expected to result in increased options for mobility; less greenhouse gas (GHG) emissions; more walkable communities; and fewer travel barriers for active transportation and those who cannot drive such as children or people with disabilities. Complete streets play an important role for those who would choose not to drive if they had an alternative as well as for those who do not have the option of driving. The Complete Streets Act specifically encourages an increase in non-driving modes of travel while also recognizing the value that streets play in facilitating the vehicular movement of goods and people.

CEQA Requirements for Alternatives

As discussed in **Chapter 5.0 Alternatives** of the EIR, CEQA requires that an EIR describe a reasonable range of alternatives to the project that could feasibly avoid or lessen significant environmental impacts while substantially attaining the basic objectives of the project. The CEQA statute, the CEQA Guidelines, and court cases do not specify a precise number of alternatives to be evaluated in an EIR. Rather, "the range

of alternatives required in an EIR is governed by the rule of reason that sets forth only those alternatives necessary to permit a reasoned choice.” At the same time, Section 15126.6(b) of the CEQA Guidelines requires that “...the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project” and Section 15126.6(f) requires, “[t]he alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” CEQA Guidelines require that a "No Project" alternative be included and, if appropriate, an alternative site location should be analyzed. Other project alternatives may involve a modification of the proposed project elements at the same project location. CEQA does not require the lead agency to consider alternatives that do not achieve the underlying fundamental purposes of the project (*In re Bay-Delta* (2008) 43 Cal.4th 1143, 1157, 1164); alternatives that will not reduce significant impacts (*City of Maywood v. LAUSD* (2012) 208 Cal.App.4th 362, 419); or alternatives that are not potentially feasible (CEQA Guidelines, § 15126.6(a); *City of Long Beach v. LAUSD* (2009) 176 Cal.App.4th 889, 920). An EIR is also not required to consider multiple variations on alternatives or alternatives to components of a project (*Village Laguna v. B'd of Supervisors* (1982) 134 Cal.App.3d 1022); *California Native Plant Soc’y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 993.).

Planning Process for Project

Based on the nature of the project, many potential alternatives were screened out in the planning process as not feasible or capable of meeting the City’s objectives and goals for the plan. An initial screening process using public input and transportation system characteristics was conducted to identify priority corridors where mobility improvements could be implemented. These locations and types of mobility improvements were further refined through the use of the updated version of the City of Los Angeles Travel Demand Model which is able to incorporate multiple variables and information to provide regionalized output, that a traditional traffic analysis is incapable of providing at a reasonable cost or schedule. The mobility improvements considered as part of the project alternatives were categorized by mode (vehicle, pedestrian, bicycle, transit) to bracket the range of options and provide a range of complete street alternatives that improve performance on the multi-modal network. The model simulates existing conditions and forecasts future year conditions for the network, with and without the effects of the project, allowing for an efficient evaluation of a range of automobile and transit performance measures, providing data that takes into account the cumulative effect of all modes of travel and allows for a systematic comparison of mobility improvements, which can be prioritized to maximize the effects of the proposed improvements. Improvements are focused on priority corridors that were developed with public input, and represent the greatest opportunities to improve mobility. The evolution of these improvements resulted in a screening of alternatives. Improvements that satisfied objectives and found feasible for each mode and provided the greatest increases in mobility were carried forward. This process was carried out over-time as a result of public meeting and iterative traffic analyses.²¹

The MP 2035 is evaluated as a package of improvements. During the development of the MP 2035, a package of treatment options ranging from Moderate to Comprehensive enhancements were identified as alternatives to satisfy the of the MP 2035 to varying degrees and bracket the range of potential impacts that could occur from varying improvements by mode.

No alternatives were identified in the planning process for the MP 2035 or the preparation of the EIR that would reduce all of the significant impacts associated with the proposed project while satisfying a majority of project goals and objectives. Even without the project, significant impacts are expected in most of the issue areas because of increased development and associated traffic (and therefore associated noise and emissions) that would occur with or without the implementation of the MP 2035. Because of the complex and built out existing transportation system and adjacent development, the elimination of impacts associated with one mode of transportation (e.g., reduced congestion on the vehicular network) comes at the expense of

²¹Documentation associated with this process is on file and available for review at the Department of City Planning, City Hall, Room 667.

other modes (safety to pedestrians and bicyclists), adjacent land use (displacement of residents/businesses through right-of-way acquisition required for widening), or project objectives (less access for transit dependent persons or multi-modal system).

EIR Alternatives

Alternatives to the proposed project were identified on the basis of their ability to attain all or most of the basic objectives of the project while reducing the project's significant environmental effects. Alternatives were identified based on 1) feasibility, 2) the potential to mitigate significant project-related impacts, and 3) reasonably informing the decision-maker regarding a range of options. The alternatives analyzed in the EIR represent a full range of changes to the enhancements proposed by the project for the various components of the transportation system (vehicles, transit, bicycles, and pedestrians). These alternatives range from moderate to comprehensive. The alternatives bracket the range of potential impacts from the project and range from an alternative with less intensive intervention to more intensive intervention compared to the project and the existing environment. This allows the decision-maker and the public to see the effect of approving the project or a potential alternative to the project (including an EIR alternative or a variation on an EIR alternative or the project). The RDEIR identifies a total of five project alternatives that range from no intervention with city roadways to major changes/interventions on City streets.

On the lowest end of the alternative range of mobility improvements (least amount of change from existing conditions) is the No Project Alternative (Alternative 1) that represents reasonably foreseeable mobility options if the MP 2035 is not implemented. This would represent the most moderate set of improvements that does not attempt to shift the mode of transportation to a more balanced system, keeping things as they are. In addition to the proposed project and No Project alternative, there are four alternatives considered in the EIR that bracket the range of alternatives satisfying project goals.

Alternative 2 represents an alternative that shifts towards a more multi-modal transportation system, but does so with less comprehensive enhancements (more moderate) than those proposed as part of the project. The more moderate enhancements (in Alternative 2 most TEN enhancements would be Moderate as compared to the greater extent of Moderate Plus or Comprehensive lane miles under the proposed project) associated with this alternative would therefore result in fewer lane conversions on the TEN, which could result in potentially fewer impacts to the vehicular circulation system and biological resources.

Alternative 3 includes the same roadway and transit assumptions (intensity of infrastructure and enhancements) as for the proposed project except that it does not include analysis of the priority planned or planned bicycle lanes on the Bicycle Lane Network that are not part of the BEN (i.e., analysis assumes no vehicle capacity restrictions – no reduction in vehicle travel lanes -- from bicycle lanes). Alternative 3 includes fewer (approximately 10% citywide, but approximately 50 percent fewer in the Valley) miles on the TEN, which could result in potentially fewer impacts to the vehicular circulation system and biological resources. This alternative is the proposed project that was evaluated in the previously circulated Draft EIR.

Alternative 4 includes the same roadway enhancements as for the proposed project except that it includes only the priority portions of the Bicycle Lane Network. The remainder of the bicycle lanes described as planned on the Bicycle Lane Network are not included in Alternative 4. This alternative evaluates the condition where only a portion of the Bicycle Lane Network could be implemented due to funding or other constraints and lies in the range between Alternative 3 and the proposed project, and could result in potentially fewer impacts to the vehicular circulation system due to the fewer lane miles that would be eliminated from vehicle use.

Alternative 5 includes the same roadway enhancements as for the proposed project except that it assumes that all streets on the TEN would have mostly comprehensive enhancements including exclusive bus lanes for the whole day (as compared to the project which includes one-third of enhancements as Moderate and one third as Moderate Plus and one third as Comprehensive). This alternative represents increased intervention on roadways as compared to the proposed project as it would require full conversion of lanes on

the TEN to exclusive bus-only lanes, which could result in potentially fewer impacts to safety and pedestrians and bicyclists. While this would provide the most benefits for a multi-modal system, it would involve the most intervention to the roadway system and would have the most impacts on vehicular capacity.

Alternatives 2 and 3 were assessed quantitatively through the transportation demand model. Alternatives 4 and 5 are variations to provide additional information comprising the spectrum of alternatives with varying environmental conditions (Alternative 4 - Project with Priority Bike Lanes Only [in general those bike lanes that have been identified to be implemented in the short-term] and Alternative 5 - Increased Comprehensive Enhancements, Transit Only Lanes).

Chapter 5.0 Alternatives provides a detailed discussion by environmental topic area, of the potential effects of each of the alternatives and compares them to the proposed project. Even without the project, significant impacts are expected in most of the issue areas because of increased development that would occur with or without the implementation of the MP 2035. The alternatives evaluated in this section would satisfy project goals and objectives to varying degrees and would vary incrementally in the intensity of environmental effects.

To the extent that some commenters argue the City should have studied an alternative that focused on reducing vehicle congestion, using a vehicle-centric analysis, Alternatives 1 through 4 could incrementally reduce impacts related to vehicle congestion because fewer lanes would be converted to bicycle and transit use. To the extent that the commenters are saying the EIR should study an alternative that focuses on an objective to reduce vehicle congestion instead of focusing on an objective to increase bicycle, pedestrian and transit uses, that is not required as it would not further the primary objectives of the MP 2035 which is to implement the Complete Streets Act and increase the use of bike, pedestrian and transit uses (CEB, Practice Under the CEQA Section 15.8).

Some commenters questioned why the EIR did not analyze an alternative that included a more aggressive approach to interventions that promote bicycle and pedestrian uses.²² As stated in the CEQA Guidelines, “[a]n EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative” (CEQA Guidelines, Section 15126.2(f)(3)). As discussed above, the development of the BEN in the MP 2035 came through an extensive planning process. Based on this analysis, the City considers it unreasonable to assume more extensive enhanced networks, including the BEN, could be implemented in the City. As identified in multiple places in the MP 2035 and the EIR, full implementation of the MP 2035 within the next 20 years is unlikely and would require the identification of significant resources. Based on this, there is no reason to believe a more extensive pedestrian, bicycle network could be implemented and therefore, is not required to be studied as an alternative. (CEQA Guidelines, Section 15126.2(f)(3).)

Some commenters requested the analysis of alternatives to specific streets or corridors. However, this was not expected to lead to meaningful analysis or information for purposes of the EIR. The programmatic analysis, completed as part of the MP 2035, captures the range of environmental impacts of numerous mobility improvements throughout the City of Los Angeles to the regional transportation system. With the Transportation Demand Model, results on a large scale (City wide or APC level) can be validated with a high degree of accuracy. However, the smaller the scale (intersection or segment), the lower the accuracy, as the margin of error increases. (See discussion in **Master Response 22** related to level of analysis for traffic impacts). At the programmatic level of analysis, such impacts at the street level, including in alternatives, is speculative. This level of analysis can only be done at the project level when sufficient amount of detail is available to analyze. Therefore, this process of evaluating mobility improvements would continue with a more detailed environmental analysis of mobility improvements on a project by project basis, when specific

²²This is contrasted with commenters who requested an alternative that studied a more aggressive approach to reducing vehicle congestion. Note, as discussed above, traffic congestion reduction was not an objectives for the project.

details are foreseeable and reasonably known. This would provide an opportunity for a more focused range of alternatives specific to certain corridors or segments that could be feasibly studied.

Master Response 13: Bicycle Safety

Several comments expressed concerns related to the safety of bicyclists in proximity to buses and impacts to traffic flow and delay. Some comments requested additional facilities, such as those that could be implemented under the BEN, while other comments requested additional accident data for particular corridors. The implementation of bicycle facilities associated with the MP 2035 is anticipated to improve safety and health outcomes for bicyclists and other road users.

Automobile speed is a major factor in the severity of collisions with bicyclists and pedestrians, the most vulnerable roadway users. Collisions with a vehicle traveling at 20 miles per hour results in a five percent pedestrian fatality rate, and fatalities increase to 40, 80 and 100 percent when the vehicle speed increases to 30, 40 and 50 miles per hour respectively.²³ Bicycle lanes, when accompanied by travel lane reduction, can help reduce over-all vehicle speed.²⁴ When modified from four travel lanes to two travel lanes with a two-way left-turn lane, research along 45 corridors throughout the United States has found a range of 19 percent to 47 percent reduction in all roadway crashes. The Federal Highway Administration (FHWA) assigns a crash modification factor of road diets of 29 percent, meaning the implementation of a road diet should reduce the number of traffic collisions by approximately one third. The upgrade to fully-protected bicycle lanes or cycle tracks has been shown to reduce the risk of injury by 90 percent.²⁵

The bicyclist and pedestrian improvements envisioned in the MP 2035 are also anticipated to increase the number and visibility of bicyclists and pedestrians on the City's transportation network. 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 as the number of bicyclists increases, revealing a non-linear relationship between bicycle safety and the level of bicycling.²⁶ This study showed as much as an eight-fold variation of collisions (expressed as a percentage of those that bike or walk to work) in comparing low and high bicycling cities.²⁷ 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 show that higher bicycling rates among the population generally show a much lower risk of fatal crashes for all road users.²⁸ Comparing these low versus high bicycling communities, there was a ten-fold reduction in fatality rate for motorists, and eleven-fold reduction in fatality rate for pedestrians, and an almost fifty-fold reduction in fatality rate for bicyclists.²⁹

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.³⁰ A 2000 Safety Study of 682 bicycle-motor vehicle crashes in Phoenix found that

²³U.S. Department of Transportation National Highway Traffic Safety Administration, *Literature Review on Vehicle Travel Speeds and Pedestrian Injuries*. DOT HS 809 021, 1999.

²⁴Federal Highway Administration (FHWA) website.
<http://www.fhwa.dot.gov/publications/research/safety/10053/index.cfm>, accessed on November 19, 2012

²⁵Kay Teschke et al. 2012. *Route Infrastructure and the Risk of Injuries to Bicyclists: A Case-Crossover Study*. *American Journal of Public Health*.

²⁶Jacobsen, P.L. 2003. *Safety in Numbers: More Walkers and Bicyclists, Safety Walking and Bicycling*. *Injury Prevention* 9-31:205-209.

²⁷*Ibid.*

²⁸Marshall, Wesley E., N. W. Garrick. *Evidence on Why Bike-Friendly Cities Are Safer For All Road Users*. *Environmental Practice* 13 (1) March 2011.

²⁹*Ibid.*

³⁰Adam Arvidson, 2012. *Power to the Pedalers*. Planning May/June 2012, pp. 12 through pp.17.

95 percent of crashes occurred on streets with no bicycle facilities, compared with only two percent in bicycle lanes.³¹

The inclusion of protected bicycle lanes, like those proposed in the MP 2035, further increases the level of safety. New York City implemented the first fully protected bike lanes in the Country. Protected bike lanes in New York City on 8th Avenue and 9th Avenue resulted in 35 percent and 58 percent decrease respectively in injuries to all road users.³² In the same study, implementation of bus/bike lanes on First and Second Avenues led to 37 percent decrease in injury crashes.³³

Public health professionals are paying an increasing amount of attention to the consequences of sedentary lifestyle on public health, further finding that prevailing transportation and land use patterns present barriers to healthy travel options.³⁴ Health experts maintain that thirty minutes a day of utilitarian bicycling (replacing short distance trips of five miles or less) constitutes an adequate level of ‘moderate intensity’ of activity shown to produce the optimal health benefits that include lower blood pressure as well as lower incidents of obesity, diabetes, heart disease and other diseases.³⁵ Available data show that modest increases in bicycling resulted in an 11 percent reduction in heart disease, and a study in Copenhagen found a 28 percent reduction in mortality.³⁶ Increases in bicycling have also been shown to improve mental health, alleviate symptoms of depression and anxiety, improve cognitive function of school aged children, prevent or slow cognitive decline in older adults, as well as contribute to an overall sense of wellbeing.³⁷ The same literature also suggests that benefits from increased bicycling at the community level helps to lower crime and fosters civil social interactions.³⁸

According to the County Health Rankings and Roadmaps program,³⁹ 19 percent of the population in Los Angeles County lacks the recommended amount of physical activity while 22 percent are classified as obese.⁴⁰ As stated above, the implementation of bicycle lanes will encourage higher bicycle ridership from portions of the population that are currently reluctant to bicycle without adequate facilities, thereby increasing access to healthy activities and fostering healthy outcomes for a larger section of the population.

Bicycle accident data was compiled by LADOT as part of the implementation of the Bike Plan in 2013. The figure below shows a hot spot analysis of bicycle collisions per square mile. The data was compiled using the Transportation Injury Mapping System (TIMS) developed by the University of California, Berkeley (<http://www.tims.berkeley.edu/>). Bicycle accident data for individual roadways can also be found at this website. The MP 2035 EIR is a programmatic document that addresses impacts at an APC level based on preliminary conceptual level information. The collection of additional accident data would not change the impact conclusions reported in the EIR. As projects are designed more data will be collected and detailed analysis will be undertaken. See **Master Response 19** for additional information on the implementation of the MP 2035.

³¹ *Ibid.*

³² NY DOT, 2012. *Measuring the Street: New Metrics for 21st Century Streets*.

³³ *Ibid.*

³⁴ Designing Healthy Communities website, <http://designinghealthycommunities.org/the-american-way-of-unhealthful-living/>, accessed on November 19, 2012.

³⁵ Garrard, Jan., Chris Rissel, and Adrien Bauman. 2012. Health Benefits of Cycling, a chapter in *City Cycling*, edited by John Pucher and Ralph Buehler.

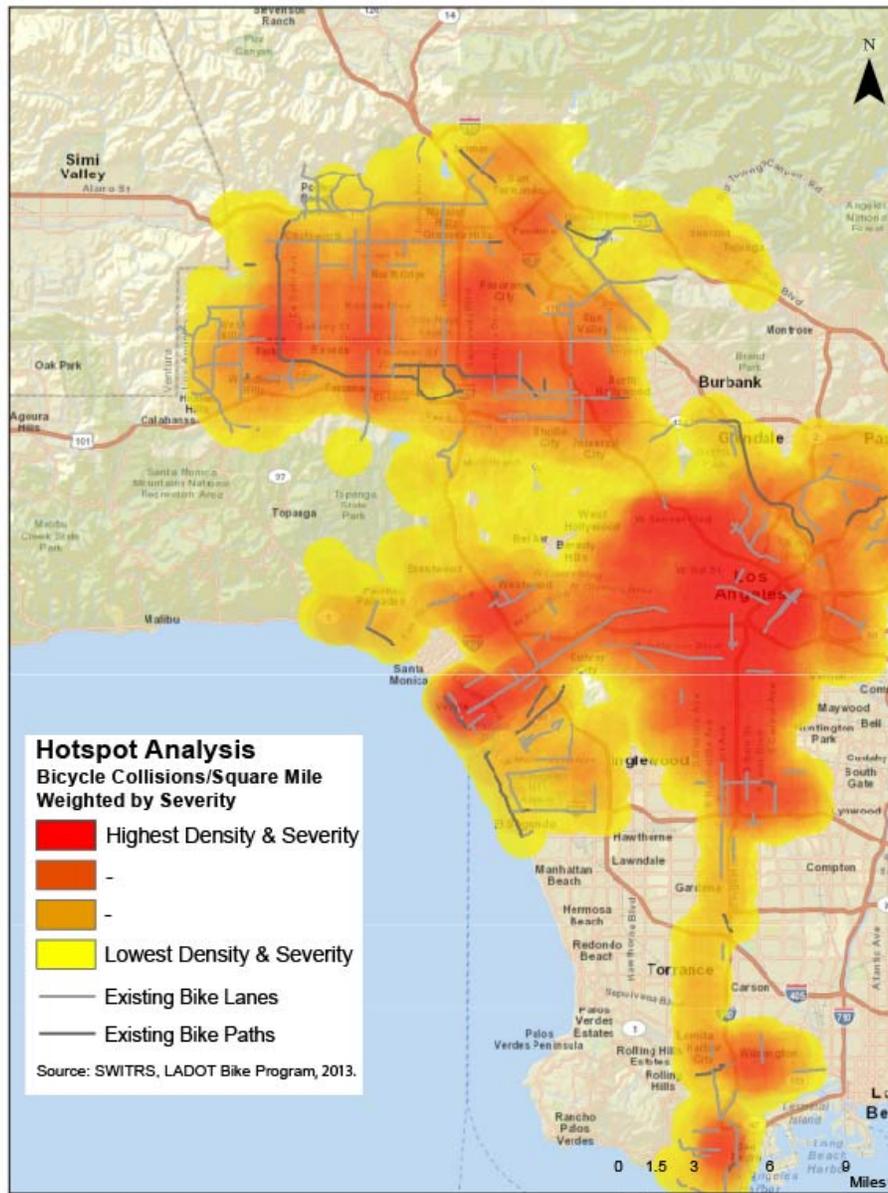
³⁶ *Ibid.*

³⁷ *Ibid.*

³⁸ *Ibid.*

³⁹ A collaboration between the Robert Wood Johnson Foundation and the University of Wisconsin Population Health Institute, County Health Rankings & Roadmaps program website, <http://www.countyhealthrankings.org/app/california/2012/los-angeles/county/1/overall>, accessed on November 19, 2012.

⁴⁰ *Ibid.*



Master Response 14: Emergency Vehicle Access and Response Times

Several comments expressed concerns regarding the potential for the proposed project to delay emergency responders and impact emergency access. The Los Angeles Fire Department (LAFD) in collaboration with LADOT has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling on designated streets in the City.⁴¹ The City of Los Angeles has over 205 miles of routes equipped with FPS. Where segment-level LOS would be significantly impacted, emergency vehicles may also be significantly impacted due to the project's location in a congested area of Los Angeles. As stated under Impact 4.1-5, since the proposed project could contribute to increased delay for drivers in the areas of proposed change, and include design elements that impede emergency access, the proposed project would have a potentially significant impact related to inadequate emergency vehicle access, and the following Mitigation Measure **T5** would reduce these potential effects:

“LADOT, LAFD and DCP shall coordinate and review design plans involving lane reallocation to ensure that emergency response access is adequately maintained (for example by expanding the Fire Preemption System).”

The MP 2035 EIR provides a programmatic evaluation of impacts to emergency services. While the project would impact segment-level LOS, there is not a direct relationship between predicted travel delay and response times as California State law does require drivers to yield the right-of-way to emergency vehicles and even permits emergency vehicles to use opposing lane of travel, or the center turn lanes. In addition, many of the roadway configurations as shown in the Complete Streets Design Guide would include continuous center left turn lanes, which facilitate emergency access when the thru lanes experience delays. In some instances, a roadway reconfiguration could improve emergency access where a continuous center left turn lane is introduced where it did not previously exist. Generally, multi-lane roadways allow the emergency vehicles to travel at higher speeds and permit other traffic to maneuver out of the path of the emergency vehicle.

LAFD has a mandate to protect public safety and must respond to changing circumstances and, therefore, acts to maintain response times. The proposed project, together with cumulative growth, would increase congestion, which could impede emergency access. In addition, increased development would likely increase calls for service. The steps that LAFD will have to take to maintain public safety are not reasonably foreseeable at this time. Options available to LAFD include expanding the FPS, increasing staffing levels and adding new fire stations(s) to underserved areas. Depending on the location of new fire protection facilities operational impacts (primarily noise) could occur; however, such impacts are unforeseeable and speculative at this time. Because CEQA requires comparison to existing conditions, and a number of factors will contribute to the need for new LAFD facilities, including project actions, and because it is not possible to foresee all potential stressors to the fire protection system to which the project would contribute, in the interests of being conservative, even with implementation of Mitigation Measure **T5**, impacts are considered potentially significant.

Master Response 15: Legislative Changes and Additional Transportation Performance Metrics

Comments expressed concerns regarding increased congestion and vehicle delay, the prioritization of vehicles in the transportation system and the need to analyze traffic delay and level of service. Vehicular congestion impacts in compliance with CEQA are discussed in **Master Response 1**. This master response provides information on additional performance metrics that can be considered based on recent changes in legislation. On September 27, 2013, Governor Jerry Brown signed SB 743 into law and started a process that could fundamentally change transportation impact analysis as part of CEQA compliance. SB 743 directs OPR to develop revisions to the CEQA Guidelines by July 1, 2014 to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic level of service. These

⁴¹Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Los Angeles Fire Department, Bulletin No. 133, October, 2008.

changes will include elimination of auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts in many parts of California (if not statewide). Further, parking impacts will not be considered significant impacts on the environment for residential and job-producing projects within infill areas with nearby frequent transit service. According to the legislative intent contained in SB 743, these changes to current practice were necessary to "...more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions."

Since the OPR Guidelines in response to SB 743 are still not completed, the transportation analysis in this document relies on the legal context and policy framework in place at the time of project initiation. It is possible that some or all of the impacts related to vehicular delay and LOS that are considered significant under the current legal and policy framework would no longer be considered significant if analyzed using the new (currently draft) criteria.

Regarding SB 743's guidance on *Induced Vehicle Travel and Transportation Projects*, overall the proposed project would reduce the vehicular capacity of the roadway network. The implementation of the enhanced networks would require the repurposing of existing vehicular travel lanes into transit or bicycle facilities. As discussed in **Section 4.1 Transportation, Parking and Safety**, the proposed project would result in an overall reduction of VMT compared to the Future No project scenario. Given this conclusion, the proposed project would not result in a significant transportation impact under the new CEQA guidance.

The new draft guidance on SB 743 focuses on per-capita VMT. Other potential metrics that could be considered include total VMT, vehicle trips, and peak period mode split. These alternate criteria are addressed in **Section 4.1 Transportation, Parking and Safety** as additional information for the project. However, significance thresholds for these metrics have not yet been established by OPR or the City of Los Angeles.

As discussed in **Section 4.1 Transportation, Parking and Safety**, the comparison between the Future No Project and Future With Project conditions present substantially different outcomes in 2035.⁴² While it has been noted in **Section 4.1 Transportation, Parking and Safety** and throughout this Final EIR, that the metrics evaluated with the travel demand model represent a vehicle-centric approach based on historical travel behavior patterns, even so, the Future With Project scenario delivers major changes in mode share, vehicle travel, and multimodal accessibility that are consistent with City of Los Angeles goals and objectives as described in the Mobility Plan 2035. Notable highlights from the other metrics analysis include:

Mode Split

- The implementation of the BEN and TEN enhanced networks includes the repurposing of existing vehicular travel lanes into transit or bicycle facilities. While this may be described as a decrease in vehicular capacity, it can also be described as an increase in overall person carrying capacity.
- This increase in multimodal network capacity is forecast to result in increased active transportation and transit travel compared to Existing levels:
 - Bicycling +170 percent
 - Transit +56 percent
 - Walking +38 percent
- Forecast increases in transit boardings are 32 percent greater than the Future No Project, which equates to over 400,000 more transit boardings every day.

⁴²The future baseline results reported in the transportation analysis were provided for informational purposes; the EIR evaluates impacts compared to existing conditions.

Vehicle Travel

- Future With Project forecasts indicate that even with the conversion of over 560 miles of general purpose travel lanes to BEN or TEN lanes, the proposed project would result in an overall reduction in VMT relative to the Future No Project.
- Future With Project conditions reduce the total number of vehicle trips 2.2 percent from Future No Project conditions to approximately 9.7 million, which is a reduction of 219,000 trips every day.
- Although they comprise only 181 miles of roadway network in support of the nearly 7,500 miles of surface roadways in the City of Los Angeles, freeway travel accounts for over half of all daily VMT within the City.
- Future With Project conditions reduce daily VMT to 80.9 million, which is approximately 1.7 million fewer miles traveled every day than Future No Project conditions.
- Relative to Future No Project conditions, freeway VMT increases by 3.3 percent, while surface street VMT decreases by 8.3 percent.
- Future With Project conditions result in a daily VMT per capita to 13.0 miles, comparable to Existing levels and 2.1 percent lower than Future No Project levels.
- Under Future No Project conditions, daily VMT on freeways increases to 1.8 million, 14.2 percent above Existing Base levels. With the Future Project conditions daily freeway VMT increases to 2.0 million, representing a 27 percent increase above Existing levels.

Accessibility

- More than 95 percent of the City's population and employment would be within one mile of a high-quality bicycle facility under Future With Project conditions. This serves an additional two million residents and 780,000 jobs relative to the Future No Project.
- 70 percent of jobs and 65 percent of residents would be within one-quarter mile of a high-quality bicycle facility under the proposed project.
- Bicyclist accessibility increases with Project conditions represent a six-fold increase over Future No Project conditions.
- More than 80 percent of the City's population and 85 percent of its employment would be within one mile of a high-quality transit facility under Future With Project conditions. This serves an additional 1.1 million residents and 370,000 jobs relative to the Future No Project conditions.
- Accessibility to high-quality transit facilities within one-quarter mile would increase more than three-fold for population and would more than double for employment between the Future No Project and Project conditions.

Master Response 16: Circulation Element

Several comments expressed concerns related to the statutory requirements for a Circulation Element and the relationship of the proposed MP 2035 to those requirements and consistency with adopted land use plans. The State of California and the Los Angeles City Charter require that Los Angeles create and adopt a general plan. As described in **Chapter 3.0 Project Description**, the City's General Plan is the constitution for all future developments and as such is the heart and foundation of the City's long-range vision for growth. The State requires that each jurisdiction's general plan include seven mandatory elements: Land Use, Circulation, Housing, Conservation, Open Space, Safety, and Noise, but communities may also include additional elements that are tailored to meet specific needs and concerns. While State law requires that the various plans be internally consistent, cities are free to select a distinct name for each element and are permitted to combine and/or disaggregate the individual components of the elements in a manner that is practical for the jurisdiction.

The MP 2035 (formerly the Transportation Element) is the transportation blueprint for the City of Los Angeles. Last updated in 1999, the Transportation Element is being revamped to reflect the policies and programs that will give Angelenos a full range of options to meet their mobility needs, including bicycling,

carpooling, driving, transit, and walking. The MP 2035 will lay the policy foundation for safe, accessible and enjoyable streets for pedestrians, bicyclists, transit users, and vehicles alike.

For the City of Los Angeles, the Transportation Element, together with long-range planning documents from operational departments (including Los Angeles World Airports, Port of Los Angeles, Department of Water and Power, Department of Public Works), provides compliance with Government Code Section 65302 (b) which requires that a general plan include a circulation element consisting of the general location and extent of existing and proposed major thoroughfares, transportation routes, terminals, and other public utilities and facilities, all correlated with the Land Use Element of the General Plan.

The MP 2035 is being prepared in compliance with the 2008 Complete Streets Act (AB 1358), which mandates that when the circulation element of the General Plan is modified that it plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan. Compliance with the Complete Streets Act is expected to result in increased options for mobility; less GHG emissions; more walkable communities; and fewer travel barriers for active transportation and those who cannot drive such as children or people with disabilities. Complete streets play an important role for those who would choose not to drive if they had an alternative as well as for those who do not have the option of driving. The Complete Streets Act specifically encourages an increase in non-driving modes of travel while also recognizing the value that streets play in facilitating the vehicular movement of goods and people. The proposed project is also consistent with the 2012-2035 RTP/SCS as set forth in **Tables 4.1-17** and **4.2-3**.

The following actions will be required in order to implement the MP 2035 and its constituent goals, objectives, and policies.

- Adopt a General Plan Amendment to update the Transportation Element of the General Plan with the proposed MP 2035 and associated implementation guidelines. Changes to other Elements of the General Plan may also be necessary to implement the MP 2035.
- Revise Zoning Code Section 17.05 to expand the role of the Street Standards Committee and to reflect the City's new focus on complete streets.
- Adopt a new Los Angeles Municipal Code (LAMC) ordinance to align the street designations of streets previously designated by ordinance to reflect the corresponding revised S-470-1 Complete Streets Standards.
- Update the S-470-1 Standard Plan to include revised Complete Street Standards.
- Revisions to LAMC Section 12.37 to clarify the procedures for calculating the extent of a required street dedication and to establish a process for projects to request a waiver from a required dedication.
- Certify the MP 2035 Final EIR.
- Amend the Highways and Freeways Map of the Transportation Element of the General Plan to designate streets to new street standards.
- Adopt the ordinance repealing past arterial street designations.
- Update the arterial designations and corresponding maps for all the community plans.
- Update nomenclature of freeways on Land Use And Corresponding Zone Maps for all community plans to read as Public Facilities-Freeway.
- Adopt the Complete Street Design Guide as guidance for implementing complete streets.
- Adopt the NACTO Urban Street Design Guide and Urban Bikeway Design Guide as additional guidance for implementing complete streets.

Master Response 17: Enhanced Network Treatments on Pico and Olympic Boulevards

Several comment letters expressed concerns regarding enhanced network treatments on Pico and Olympic Boulevards that could have significant environmental impacts related to increased traffic delay and

congestion. Some comments suggested types of treatments that could be implemented along these corridors with the MP 2035. These comments will be forwarded to decision-makers for their consideration in taking action on the project. See **Master Response 22** regarding the level of detail in the analysis of the MP 2035.

Pico Boulevard is part of the proposed TEN (Moderate Plus treatment) and Olympic Boulevard is part of the proposed VEN under the MP 2035. The enhanced networks are displayed in **Chapter 3.0 Project Description** in **Figures 3-5** (TEN) and **3-6** (VEN). Contrary to some of the comments submitted, one-way treatments were not considered for either of these streets and are not part of the design features of the TEN and/or the VEN.

The TEN consists of approximately 300 miles of streets that complement the region's existing and planned rail and busway system. The TEN would improve existing and future bus service on a select group of arterial streets by prioritizing improvements for transit riders relative to improvements for other roadway users. The transit-enhanced streets aim to provide reliable and frequent transit service that is convenient and safe; increase transit mode share; reduce single-occupancy vehicle trips; and integrate transit infrastructure investments with the identity of the surrounding street. The transit technology on these streets would primarily be high-capacity buses. Bus service would be improved with infrastructure improvements in the right-of-way, signal timing and technology improvements, and stop enhancements. Corridor improvements would largely be dependent upon the population and employment densities, congestion levels, roadway conditions and bus frequency. Implementation of the TEN would be inherently intertwined with the region's bus providers including, but not limited to, the City's own Department of Transportation, Metro, Big Blue Bus, Culver City Bus and Foothill Transit.

Transit enhancements are classified as Moderate, Moderate Plus or Comprehensive based on their benefits and intensity of implementation. Moderate enhancements typically include stop enhancements and increased service, with transit vehicles continuing to operate in mixed traffic. Moderate Plus enhancements, such as Pico Boulevard proposed treatments, include an exclusive bus lane during the peak period only, while comprehensive enhancements typically include transit vehicles operating in an all-day exclusive lane. For the purposes of analyzing transportation impacts, the bus only lanes were assumed to be provided through the conversion of vehicular travel lanes and not result in parking elimination.

The VEN consists of approximately 80 miles of streets that would improve the through movement of traffic on a select group of streets by prioritizing the efficient movement of motor vehicle occupants relative to other roadway users. Enhancements include investments in intelligent transportation systems, access management and consolidation, parking restrictions and removal, improved signal timing, and turning restrictions.

Vehicular enhancements are classified as Moderate or Comprehensive based on their benefits and intensity of implementation. Moderate enhancements typically include technology enhancements and peak-hour restrictions for parking and turning movements. Comprehensive enhancements include access management, all-day lane conversions of parking, and all-day turning movement restrictions or permanent access control.

The MP 2035 is a mix of policies and conceptual-level improvements to the transportation network. Detailed roadway designs for improvements to individual roadways or corridors are not yet available. Therefore, this EIR analyzes impacts at an APC-level of detail (See **Master Response 22**). As individual projects move forward, impacts will be evaluated at a project level as appropriate.

Master Response 18: Diversion of Vehicles due to Travel Lane Conversion and Potential for Cut-Through Traffic

Comments expressed concerns regarding the potential for the proposed travel lane conversions to result in the diversion of traffic in to adjacent communities. **Section 4.1 Transportation, Parking and Safety** of the RDEIR addresses the potential for traffic to intrude in to neighborhoods (see **Impact 4.1-3**, page 4.1-35) in

accordance with the City's Traffic Impact Study Guidelines and CEQA. The impact is identified as significant and unavoidable with imposed mitigation measures.

Analysis of the transportation network generally assumes that implementing the BEN and TEN -- Moderate Plus and Comprehensive treatment levels -- would result in the conversion of vehicle travel lanes to bicycle or transit lanes. The loss of travel lanes could increase vehicle congestion and cut-through traffic, as indicated in the discussion of **Impacts 4.1-2** and **4.1-3**.

The modeling analysis undertaken for the MP 2035 EIR accounts for potential redistribution of vehicular traffic from highly congested corridors to parallel roadways that have more available capacity. The cumulative effect of cut-through traffic is accounted for in the model that includes both arterial and non-arterial roadway links. Without the project, the amount of daily VMT on surface streets is expected to *increase* by 8.6 percent, which is accounted for in the model's assignment of traffic to the network and which may result in increased cut-through volumes parallel to congested corridors. The model also accounts for some reduction in vehicle trips related to shifts to other travel modes. The Enhanced Networks are intended to facilitate travel by transit, bicycle, and walking as competitive alternatives to driving. In contrast to the future No Project condition, the Project condition results in an overall *decrease* in VMT Citywide of 8.3 percent on surface streets. In addition, the Draft EIR includes Mitigation Measure **T3 (Section 4.1 Transportation, Parking and Safety)** to address neighborhood traffic intrusion:

“In areas where implementation of the proposed project could potentially result in diversion of traffic to adjacent residential streets, The Los Angeles Department of Transportation (LADOT) shall monitor traffic on identified residential streets, upon request submitted through the Council Office, to determine if traffic diversion occurs. If traffic on residential streets is found to be significantly impacted, in accordance with LADOT's Traffic Study Policies and procedures, LADOT will work with neighborhood residents to identify and implement appropriate traffic calming measures.”

Mitigation Measure **T3** is consistent with the LADOT *Great Streets for Los Angeles Strategic Plan*. Specifically, the Strategic Plan stresses the importance of creating safe, accessible transportation services and infrastructure while protecting neighborhoods from traffic intrusion and vehicle speeding. It also includes the implementation of real-time traffic information and more efficient allocation of street space to support local foot traffic and better manage freight traffic. The implementation of Mitigation Measure **T3** would reduce the level of impact related to neighborhood intrusion to the extent feasible, but impacts could remain significant.

Master Response 19: Implementation of Enhanced Networks

Several comments related to the nature of the proposed treatments considered as part of the MP 2035 and the lack of detail in the analysis of the proposed treatments. Several of the comments requested additional information on the implementation of MP 2035 and the design details of the Enhanced Network treatments for specific corridors.

The implementation of the Enhanced Networks (TEN, BEN, VEN, and PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership.

During the development of the MP 2035, packages of treatment options ranging from moderate to comprehensive improvements were considered to reflect the policies of the MP 2035. The more comprehensive set of improvements more fully implements the MP 2035 and were analyzed in the EIR as the proposed project. However, even the comprehensive package of improvements includes a mix of levels of improvement (i.e., Moderate, Moderate Plus and Comprehensive) because the Comprehensive treatment is not appropriate for every location. For example, some corridors identified as transit priority do not have the ridership demand to warrant an all-day exclusive bus lane, and Moderate or Moderate Plus treatments were

considered to be sufficient. The Complete Streets Design Guide illustrates numerous cross sectional options and characteristics for streets in each of the Enhanced Network categories.

Where more than one enhanced network is identified for a specific segment, design modifications would include elements of each enhanced network. Where a roadway is designated as part of an enhanced network and also has a bicycle lane (or other treatments), the enhanced network design elements would take precedence. For example, on a facility that is designated as both a TEN and a BEN, designs would include both dedicated transit facilities and separated bicycle facilities. On a facility that is designated as a TEN that also shows a bicycle lane, design elements for transit would take precedence over provision of a bicycle lane.

It is anticipated that the sequencing of proposed mobility treatments proposed as part of the MP 2035 would be implemented depending on future circumstances which would balance both transportation infrastructure planning (as presented in the MP 2035) and future land use planning efforts (community plans, specific plans and occasionally individual projects). The MP 2035 will provide the framework for future community plans and specific plans that will take a closer look at the MP 2035 VEN, BEN, TEN and PED networks in specific areas of the City and may recommend more-detailed implementation strategies to realize the MP 2035. As the necessary details and funding become available prior to implementation of each project, additional environmental documentation would be required for each of the proposed mobility improvements identified in the MP 2035. The level of environmental review required would depend on the size of the project and potential for impact. All roadway alterations that would potentially incur localized impacts may require additional analysis and environmental documentation once design details are known. For example, minor alterations such as restriping or pedestrian enhancements could be addressed by a Statutory or Categorical Exemption (although still subject to exceptions to exemptions under Section 15300.2 and may result in further analysis if there are unusual circumstances or cumulative impacts). Even statutory exemptions related to bicycle lanes (SB 2245) would require a traffic and safety assessment, when specific design details are known. The implementation of project-specific improvements and future land use planning will be undertaken in an iterative manner. More detailed land use planning may reveal the need for changes to the networks, which will be undertaken as needed to reflect these more detailed planning efforts, and could require a plan amendment and related environmental review.

Master Response 20: Overview of Neighborhood Enhanced Network (NEN)

Several comments expressed concerns related to the Neighborhood Enhanced Network and that there may not be sufficient right-of-way available to implement improvements without resulting in significant impacts to pedestrian and bicycle safety and increased traffic delay/congestion.

The NEN is comprised primarily of local and collector streets that were selected for their existing or potential role in connecting communities to local assets (schools, parks, stores). NEN corridors are not typically places where the City anticipates or encourages major development but instead they are intended to provide an alternative, local mobility option for persons who use active transportation. Improvements to streets within the NEN would occur only after additional discussion and communication with the community. The NEN is an aspirational concept, the build-out of which would take place through an iterative process that would incorporate additional planning that would identify project specific details based on public input, and would include project-specific environmental clearance. NEN streets would be selected and prioritized for improvements based upon such metrics as population and employment densities, collision history and economics. NEN Improvements identified for a specific NEN corridor would be oriented towards slowing and calming the traffic speeds and volumes to ensure that the street is safe and comfortable for people walking, bicycling or using other slow-speed forms of transportation (scooters, skateboards). NEN improvements would not typically eliminate a vehicular travel lane and while the improvements may slow vehicular travel the existing vehicular capacity would by and large be retained. In locations where a NEN street crosses an arterial street where there is currently no signal and where the addition of a signal could prove contradictory to the interests of the NEN users and/or the community future improvements could be

designed in such a way as to permit for the safe crossing of persons walking and/or bicycling while restricting vehicular movements across the arterial street.

Master Response 21: Changes to Network in Hollywood

Several comments expressed concerns regarding the proposed Enhanced Networks (BEN, VEN, NEN) in the Hollywood area and the potential to impact traffic delay/congestion. A majority of the commenters believed that implementing the network treatments would create detrimental traffic impacts for the neighborhood and local businesses. The following changes have been made to the Enhanced Networks in the Hollywood area in the Plan:

- Removed VEN designation on Sunset Boulevard west of Highland Avenue
- Removed BEN designation on Hollywood Boulevard west of La Brea Avenue
- Removed BEN designation on Highland Avenue; now shown as planned future bike lane per the 2010 Bicycle Plan
- Upgrade Orange Street to priority NEN
- Removed NEN designation from Beachwood Drive
- Removed NEN designation from Canyon Drive
- Removed BEN designation from Cahuenga Boulevard; now shown as planned future bike lane per the 2010 Bicycle Plan

Hollywood Boulevard, West of La Brea on the proposed BEN and Sunset Boulevard, west of Highland Avenue on the VEN. Removal of the BEN designation on Hollywood Boulevard and the VEN designation on Sunset Boulevard would eliminate concerns about this street regarding congestion, special events, truck deliveries, cut through traffic, parking, property values, zoning, trash trucks, residential access, businesses, quality of life, unsafe pedestrian conditions, historic character, emergency access.

Widening of Sunset Boulevard, Hollywood Boulevard, Fountain Avenue and Other street. Commenters were opposed to widening due to the limited availability of existing right of way and that widening would come at the expense of decreasing pedestrian safety by narrowing sidewalks. In addition to the changes to the Enhanced Networks described above, any proposed widening would largely achieve wider sidewalks which would increase the safety of pedestrians who are required to navigate narrow sidewalks. In addition, Sunset Boulevard has been re-designated as an Avenue I from Fountain Avenue to Alpine Street where it becomes Cesar Chavez Avenue and continues as an Avenue I to Mission Road. The implementation of the Enhanced Networks (TEN, BEN, VEN, and PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments, based on upon historic City practice, established engineering standards, MP 2035 policies and CEQA, would be determined only after further study, planning, engineering, environmental review and discussion with the community and the City's leadership. The MP 2035 includes Policy 4.4, "[c]ontinue to support the role of community engagement in the design outcomes and implementation of mobility projects," and Policy 4.5, "[f]acilitate communications between citizens and the City in reporting and receiving responses on non-emergency street improvements."

Bicycle Lane on Beachwood Drive. Removal of the NEN designation on Beachwood Drive would eliminate concerns identified about having a bicycle lane on a street that commenters perceive is overburdened.

Changes Resulting from Pedestrian Enhanced Districts or the Neighborhood Enhanced Network. The changes being proposed as part of the Enhanced Networks are intended to improve safety within the City. Improvements identified on the NEN and PED for a specific corridor would be oriented towards slowing and calming the traffic speeds and volumes to ensure that the street is safe and comfortable for people walking, bicycling or using other slow-speed forms of transportation (scooters, skateboards). It is not anticipated that roadway widening would be necessary to accommodate these improvements. **Master Response 20** contains additional information on the NEN.

Increased Speed on Fairfax Avenue and Changes to Street Designations. Concerns/opinions regarding the street designations (downgrading of La Brea Avenue, Fairfax Avenue, Franklin Avenue, and Hollywood Boulevard) identified by commenters will be forwarded to decision-makers for their consideration in taking action on the project. The MP 2035 is not proposing changes to the target speeds or speed limits on Fairfax Avenue. Fairfax Avenue is designated as a Moderate Transit Enhanced street as part of the TEN. The changes being proposed as part of the Enhanced Networks are intended to improve safety within the City.

Traffic Study is Out of Date. As stated in **Chapter 1.0 Introduction** and **Section 4.1 Transportation, Parking, and Safety** of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles' Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions. As part of the Final EIR, the traffic operations analysis for City roadways was updated to reflect Year 2014 conditions (See Corrections and Additions for pages 4.1-14, 4.1-15, and 4.1-32 through 4.1-34. The updated LOS did not result in any changes to the impacts related to traffic operations (**Impact 4.1-2**) or corresponding Mitigation Measures **T1** and **T2**. See **Master Responses 1** and **19** for additional information on the traffic impact methodology and implementation of the MP 2035. **Master Response 18** discusses the diversion of vehicles due to travel lane conversions and potential for cut-through traffic.

Master Response 22: EIR Level of Analysis

Several comments requested additional information on impacts along specific corridors and roadway segments in the City (including but not limited to, noise, traffic, biology and land use). The EIR evaluates impacts at a programmatic level. Project-level details are unknown at this time and therefore a project level of analysis is not feasible and impacts at the parcel/street level would be speculative.

The project area for the MP 2035 is generally defined by the boundaries of the City of Los Angeles. The City of Los Angeles is comprised of approximately 467 square miles of land area, including approximately 214 square miles of hills and mountains. The City has over 7,500 miles of public streets that accommodate a variety of motorized vehicles, including private motor vehicles, taxis, freight vehicles, and transit vehicles. The City is geographically divided into 35 community planning areas and two special purpose districts. Given the size and complexity of the study area, and the programmatic nature of the EIR, the impact analysis contained within the EIR is grouped by the seven APCs (see **Figure 4.1-3**). Analysis results were summarized both at the citywide level and by APC for Existing Conditions, Future No Project, and Future with Project conditions. Reporting at the APC level provides decision makers with the information needed to assess the potential impacts of MP 2035 while not predetermining or speculating the final Enhanced Network treatments that could be implemented within individual communities, including design details that need to be realized on a neighborhood scale.

The MP 2035 is a mix of policies and conceptual-level improvements to the transportation network. Detailed roadway designs for improvements to individual roadways or corridors are not yet available. For purposes of comparison of impacts between different areas of the City the APC boundaries were selected as the most appropriate scale to report potential impacts for the various issue areas considered in this EIR and to provide an area-level assessment of impacts. As individual projects move forward they will be evaluated at a project level as appropriate.

As described in **Section 4.1 Transportation, Parking and Safety**, the model used to analyze the MP 2035 is based on the City's TDF model, which was updated to reflect the 2012-2035 RTP/SCS (as documented in **Appendix C**). The model forecasts AM and PM peak period and daily vehicle and transit flows on the transportation network within the City. The model contains the freeway network, major regional arterials, and both minor arterials and collector roadways in the City of Los Angeles. While the model includes the roadway segments currently identified to be on the enhanced networks, the level of detail known about the enhanced network treatments at this time, as well as the amount of detail contained in the model on a block-

by-block basis, does not permit, in the best judgment of the City or of Fehr & Peers, the City's traffic consultant on the EIR, the analysis results to be reported for individual roadway segments⁴³.

The City's TDF model specifies the number of vehicle travel lanes for individual roadway segments throughout the City. At the aggregate city-wide and APC scale, EIR results reflect the impacts related to the location and the number of travel lanes identified as Enhanced Networks. However, turn lanes, signal timings, and driveways are not accounted for in the analysis at this scale. Each of these features has the potential to affect operations, delay, VMT, and rerouting of traffic at the neighborhood level. At the programmatic level of analysis, it is not feasible or practical to develop a conceptual design and impact analysis for every segment and every intersection along the Enhanced Networks (see **Master Response 23** for a general discussion of the potential effects of the enhanced networks). Additionally, since the design treatments are expected to affect local operating conditions, reporting more detailed results from the citywide model at the link level would be misleading and present an incomplete and likely inaccurate picture of potential impacts. (See **Master Response 23** for a discussion of the effect of different design treatments on impacts.)

Given the programmatic level of analysis completed for the EIR, a conservative approach was taken to the identification of potential impacts, for example it was assumed that all bicycle lanes would result in loss of a travel lane, which may not be the case. The RDEIR indicates that based on these conservative assumptions, the proposed project would have a significant impact to the circulation system (**Impact 4.1-2**), as it would exceed the applicable thresholds established by the City, and two mitigation measures (**T1** and **T2**) would reduce the level of impact but not below the threshold of significance. Similarly, **Impact 4.1-3** related to neighborhood intrusion and **Impact 4.1-5** related to emergency vehicle access were also identified as being potentially significant and unavoidable. **Impact 4.5-2** related to operational noise was determined to be potentially significant and unavoidable related to the doubling of bus frequency. **Impacts 4.6-1**, **4.6-2**, and **4.6-3** related to biological resources, were determined to be potentially significant and unavoidable based on the potential for roadways to be widened and remove biological resources, but removal of such resources would not necessarily occur.

While certain Enhanced Network treatments could be implemented without resulting in the impacts identified in the EIR, where impacts could occur, additional project specific analysis would be required when individual projects are defined and studied for implementation.

Master Response 23: Potential Effects of Enhanced Networks

Several comments requested additional information on the enhanced treatment options and impacts on specific roadway segments in the City. The EIR identifies impacts at a programmatic level of detail (see **Master Response 22** above). The types of treatments and potential impacts of conceptual enhanced network design options are described below.

The specific benefits and impacts associated with the implementation of the Enhanced Networks are expected to vary by type, intensity, and location. Specific design choices would be made as priorities evolve and communities develop. For each of the Enhanced Networks, a series of possible treatments and elements are identified. In some cases, more than one enhanced network is identified for a given street segment. The Complete Streets Design Guide illustrates numerous cross sectional options and characteristics for streets in each of the Enhanced Network categories.

Even though the specific roadway configuration in terms of lanes and intersection treatments are not yet known at a detailed level for specific roadways, quantitative analysis of the Bicycle, Transit, and Vehicle Enhanced Networks was performed (based on available lanes but without design details for intersection geometrics or driveway access points) to understand the system and area wide impacts of the networks.

⁴³Individual roadway segments are included in the City's Travel Demand Model, which is part of the administrative record for this project.

While some of the features of the Bicycle, Transit, and Vehicle Networks such as public art, seating, and bicycle parking are not expected to have a significant impact on environmental outcomes, others such as the conversion of a general purpose vehicle travel lane to exclusive use by another mode are expected to result in significant impacts to traffic and noise.

The potential for conversion of a general-purpose travel lane to exclusive use at some or all times of the day was accounted for in the quantitative traffic modeling of the proposed project reported in **Section 4.1 Transportation, Parking and Safety (Tables 4.1-19, 4.1-20, 4.1-22, 4.1-23, 4.1-24, 4.1-25, 4.1-26, 4.1-27, 4.1-28, 4.1-29, 4.1-30, 4.1-31, and 4.1-32)**. Potential impacts to congestion/vehicle delay, and rerouting of traffic through neighborhoods (**Impact 4.1-2 and Impact 4.1-3**), vehicle miles traveled (VMT) and other metrics (see page 4.1-48), noise and vibration (**Impacts 4.5-1 and 4.5-3**), air quality (**Impacts 4.3-2, 4.3-3 and 4.3-4**) and GHG (**Impacts 4.4-1 and 4.4-2**) emissions, are quantitatively analyzed and reported in the EIR.

Impacts are reported using the citywide TDF model which specifies the number of through travel lanes defined on a link-by-link basis throughout the City. At the aggregate citywide and APC scale, the EIR identifies differing impacts by location. However, turn lanes, signal timing, and driveways are not accounted for in the analysis at this scale. Each of these features has the potential to significantly affect operations, delay, VMT, and rerouting of traffic at the neighborhood level. At the programmatic level of detail (APC area) evaluated in the EIR, it is not feasible or practical to develop conceptual design details, alternatives, and impact assessment for every segment and every intersection along the Enhanced Networks. Intersection geometries and signal timing affect local operating conditions and can make the difference in a significant impact or a less than significant impact in terms of traffic analysis. Therefore, reporting more detailed results with the citywide model at the link level (i.e., identifying LOS changes to particular street segments or sets of street segments) would be misleading and would provide an incomplete and likely inaccurate picture of potential impacts.

As an example, if a four-lane roadway with on-street parking is identified as part of the Bicycle Enhanced Network, it could be implemented as a one-way protected lane on each side of the street that could replace a parking lane (see page 32 of the Complete Street Design Guide). Or it could be implemented as a one-way protected lane on each side of the street next to the curb with a general-purpose lane in each direction converted to a parking lane. While both of these conditions would meet the BEN designation, the second design option would result in more delay to drivers on the roadway who would have only one general-purpose lane in each direction. Therefore, this conservative option (worst-case for impacts to traffic) was analyzed. It is the policy of the City of Los Angeles to not remove parking for bicycle or transit lanes where it would significantly impact land use and therefore removal of parking lanes to provide transit or bicycle lanes is not analyzed in this EIR. Removal of parking lanes was evaluated for the VEN, primarily because most of the parking on the VEN corridors is already only allowed during non-peak hours.

A similar example for the TEN would be a six-lane roadway where the TEN has one segment with a center running configuration and another segment is implemented with a side-running configuration. Intersection designs and signal operations would likely differ between these two examples and specific details such as near-side or far-side stop locations could also affect environmental impacts. However, again as for the BEN example, in the interests of providing a conservative analysis (worst case for traffic impacts), removal of a travel lane was analyzed.

As noted in **Master Response 22**, given the programmatic level of analysis completed for the EIR, a conservative approach was taken to the identification of potential impacts. While certain enhanced network treatments could be implemented without triggering the impacts identified in the EIR, the EIR identified that impacts may occur and impact findings would need to be further analyzed and defined as individual projects are studied for implementation.

As noted in **Master Response 19**, implementation of specific Enhanced Networks would require further design development and further study prior to implementation. The following descriptions outline improvements associated with each of the proposed Enhanced Networks (see pages 3-6 through 3-14 of the RDEIR for more detail).

Neighborhood Enhanced Network. The NEN would provide a network of slow, locally serving streets to connect communities to schools, retail, parks and open space, health care and employment opportunities. Streets on the NEN are typically local and/or collector streets with one lane in each direction that are enhanced with street calming that can include, but are not limited to: bump outs, round-a-bouts, ample sidewalks and street trees. The NEN streets are intended to provide a safe and convenient place to walk, roll, skate, scooter, bike and stroll. Some streets (or street segments) on the NEN may already provide a quality pedestrian and bicycle experience and would require little, if any, improvements. Others may require the addition of a signalized crosswalk to assist non-motorized users to cross a fast-moving arterial street.

Pedestrian Enhanced Districts. PEDs are proposed in locations with higher traffic volumes that include intense retail and/or employment activities. The PEDs are typically focused on a relatively defined geographical area, such as an intersection or series of connected intersections. Every trip, regardless of mode, includes walking, and pedestrians are the most vulnerable roadway users. The PEDs establish areas where improvements for pedestrians would be prioritized relative to improvements for other roadway users. The PEDs would be located near schools, transit stations, areas of high pedestrian activity, areas with high collision frequency, or other placemaking opportunities. Additional pedestrian safety and enhancements, such as increasing sidewalk widths and improved pedestrian crossing and safety treatments, would also be considered as appropriate. Pedestrian needs are closely linked to the TEN because of the conditions encountered walking to or from transit services as well as waiting at stops and stations. Pedestrian enhancements would primarily consist of infrastructure improvements within the sidewalk and street right-of-way, as well as pedestrian signal timing infrastructure improvements. Typical pedestrian enhancements include way-finding, street trees, pedestrian-scaled street lighting, enhanced crosswalks at all legs of the intersection, automatic pedestrian signals, reduced crossing length (e.g., bulb-outs, median pedestrian refuges), wider sidewalks (greater than 15 feet where feasible), and specialty paving and seating areas where special maintenance funding exists.

Bicycle Enhanced Network. Improvements along the BEN and/or Bicycle Lane Network primarily consist of right-of-way infrastructure improvements, signal-timing infrastructure improvements, and end of trip facilities. Bicycle enhancements vary based on their benefits and intensity of implementation. Moderate enhancements include standard 5-foot to 7-foot bicycle lanes alongside the vehicular lane, and can also be provided through a shared transit/bike lane. Moderate Plus enhancements typically include a buffered bicycle lane that has no physical on-street parking buffer; these lanes would not require intersection signalization for bicycles or turning-movement restrictions for motor vehicles, and in some cases, can be implemented as an early options for a future cycle track and/or an enhanced treatment opportunity on the Bicycle Lane Network. Comprehensive enhancements include cycle tracks/protected bicycle lanes that offer an increased degree of separation between bicyclists and the adjacent travel lanes (e.g., a physical on-street parking buffer between the vehicular travel lanes and the bicycle lane); in addition, these lanes would likely implement signalization for bicycles and turning-movement restrictions for motor vehicles.

Transit Enhanced Network. The designation of a TEN is intended to prioritize key corridors for public transportation based on the existing transit network. Improvements along the TEN range from Moderate to Moderate Plus to Comprehensive, based on their benefits and intensity of implementation. The range of treatments and different levels of intensity are focused on improvements to service, infrastructure, and interconnectivity. Moderate enhancements typically include stop enhancements and increased service, with transit vehicles continuing to operate in mixed traffic. Moderate Plus enhancements include an exclusive lane during the peak period only, while comprehensive enhancements typically include transit vehicles operating in an all-day exclusive lane.

Vehicle Enhanced Network. The designation of a VEN is intended to prioritize key corridors to facilitate vehicular travel based on the existing traffic volumes. The range of treatments and different levels of intensity are focused on parking changes, access management, and capacity/flow. Moderate enhancements typically include technology enhancements and peak-hour restrictions for parking and turning movements. Comprehensive enhancements include access management, all-day lane conversions of parking, and all-day turning movement restrictions or permanent access control.

Master Response 24: Safety for Pedestrians and Other Vulnerable Populations

Several comments expressed concerns related to the safety of pedestrians and other vulnerable users of the transportation system. The implementation of pedestrian facilities associated with the MP 2035 is anticipated to improve safety for pedestrians and other road users. Any potential environmental impact to pedestrians, people with physical impairments, those walking with strollers, etc., is speculative under the project and while several commenters have made arguments, statements or given opinions on adverse impacts, no commenters have provided any substantial evidence that there is a possible significant impact.

The MP 2035 is providing the foundation for a network of Complete Streets and establishing new Complete Street standards that will provide safe and efficient transportation for pedestrians (especially for vulnerable users such as children, seniors and the disabled), bicyclists, transit riders, and car and truck drivers. As stated in the January 28, 2014 Los Angeles City Council Motion, “Complete streets take into account the many community needs that streets fulfill. Streets do not just move people from one location to another. They provide a space for people to recreate, exercise, conduct business, engage in community activities, interact with their neighbors, and beautify their surroundings. Complete streets offer safety, comfort, and convenience for all users regardless of age, ability or means of transportation. They also lead to other public benefits, including improved transportation, a cleaner environment, and healthier neighborhoods.”

The MP 2035 responds to changing demographics, a younger population desirous of safe and accessible active transportation options (bike, walk), a growing number of residents and employees seeking alternatives to the car, and an aging population that may need to rely more and more on transportation alternatives to the automobile. In 2030, senior citizens will make up one fifth of Los Angeles County’s population. This older population (as well as children and the disabled) will benefit from longer pedestrian crossing times, shorter street crossing distances, wider, shaded sidewalks, street benches, and separated bicycle facilities. Ultimately, there is nothing in the project that is expected to significantly reduce or impede pedestrians, including but not limited to the disabled, those with strollers, and bus riders.

The *Complete Streets Design Guide: Great Streets for Los Angeles* (Guide) is consistent with current LADOT policy and the *California Manual on Uniform Traffic Control Devices* (CA MUTCD). The guide provides a compilation of design concepts and best practices that promote the major tenets of Complete Streets—safety and accessibility. The Guide is not meant to supersede existing technical standards provided for in other City or national manuals. Rather, it is intended to supplement existing engineering practices and requirements in order to meet the goals of Complete Streets. Due to specific site and operational characteristics associated with any given street, any proposed street improvement project must still undergo a detailed technical analysis by the appropriate city departments. Overall, this Guide hopes to indoctrinate the concept of Complete Streets into Los Angeles’ present and future street design so that all stakeholders are able to plan for, implement, and maintain safe and accessible streets for everyone. As mentioned in **Master Response 23**, automobile speed is a major factor in the severity of collisions with bicyclists and pedestrians, the most vulnerable roadway users.

The majority of the proposed new street designations (see **Table 3-3 in Chapter 3.0 Project Description**) minimize the amount of street widening that will occur in the future to accommodate vehicular travel and preserve more right-of-way for wider sidewalks to accommodate pedestrians and other vulnerable populations. Roadway widening would be associated with increased sidewalk widths such that sensitive receptors would be no closer to the travel lane than existing, and could become further away.

2.3 RESPONSES TO COMMENTS LETTERS RECEIVED ON THE DRAFT EIR

LETTER NO. 100

John R. Anderson
Los Angeles Unified School District
Office of Environmental Health and Safety
333 South Beaudry Avenue, 28th Floor
Los Angeles, CA 90017

Comment 100-1

Of particular relevance to LAUSD schools within the City are the issues related to pedestrian safety and mobility as it pertains to so-called “vulnerable users”, which should include students. In summary, LAUSD requests that proximity and utility to school-based populations be a key consideration as the City prioritizes projects to be implemented, especially those designed to achieve the following goals: • Improve safety and increase overall walk-ability through targeted enhancements at 50 locations annually. • Increase the miles of roadways, paths and sidewalks that are repaired every five years. • Increase the number of curb cuts and other features that accommodate disabled and other vulnerable users.

Response 100-1

The commenter’s concerns/opinions regarding pedestrian safety and mobility improvements for identified vulnerable users will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035, and see **Master Response 13** for the EIR analysis and conclusion on safety with implementation of the MP 2035.

LETTER NO. 101

(Yen) Ken Chiang
California Public Utilities Commission
320 West 4th Street, Suite 500
Los Angeles, CA 90013

Comment 101-1

Any modification to the existing public crossings requires authorization from the Commission through the General Order (GO) 88-B process. RCES representatives are available for consultation on any potential safety impacts or concerns on the nearby crossings. More information can be found at: <http://www.cpuc.ca.gov/PUC/safety/Rail/Crossings/go88b.htm>. In addition, the opening of any new rail crossing will require a formal application to be submitted to the Commission for approval and construction. More information can be found on the Commission's web site: <http://www.cpuc.ca.gov/PUC/safety/Rail/Crossings/formalapps.htm>.

Response 101-1

The commenter's concerns/opinions regarding the approval procedure for modification of existing public crossings will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. The City shall work with the CPUC for any possibly affected crossings.

LETTER NO. 102

Deborah Weintraub
Bureau of Engineering
1149 S. Broadway, Suite 700
Los Angeles, CA 90015-2213

Comment 102-1

This paragraph is the first mention of specific potential "unavoidable and significant impact[s]" due to the proposed project. After the second sentence, consider adding in parenthesis "refer to Table 2-1: Summary of Impacts - Project Alternatives" for clarification.

Response 102-1

The first paragraph of **Section 1.6 Areas of Controversy/Issues to be Resolved**, page 1-5 the following is added to the end. See Table 2-1 for a summary of impacts.

Comment 102-2

World Class Infrastructure: the bullet point about bring in City-owned bridges to "good condition" by 2035 should be revised to "Strengthen and upgrade City-owned bridges by 2035." Vehicle Enhanced Network (VEN) should include congestion relief. MTA Call still has a congestion relief category. Therefore, the City should have an ongoing program that utilizes MTA Call funds to construct dedicated turn pockets and widen where dedication is available to meet the S-470 requirements. Goods movement is not adequately addressed in this EIR.

Response 102-2

The commenter's concerns/opinions regarding congestion relief and City-owned bridge maintenance will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 8** for the EIR analysis and conclusion on Goods Movement with the implementation of the MP 2035. The MP 2035 proposes no modifications to the Goods Movement infrastructure as identified in the 1999 Transportation Element (MP 2035 completely replaces the 1999 Transportation Element). Policy 1.8 in MP 2035 addresses Goods Movement Safety, Policy 2.8 addresses Goods Movement in relation to World Class Infrastructure, and Policy 4.12 addresses Goods Movement in relation to Collaboration, Communication and Informed Choices. The commenter has not provided any substantial evidence to support its conclusion that goods movement is not adequately addressed or to support the need for different analysis or conclusions in the RDEIR conclusions or analysis. Therefore, there is no basis for further analysis and no further response is required. (CEQA Guidelines, Sections, 15088, 15204(e).)

Comment 102-3

See comment below. Fig 3-3 shows Hyperion as it crosses the river as part of the BEN, but the table on page 3-7 lists only Fletcher, not Hyperion.

Response 102-3

The RDEIR contains a figure displaying the updated Bicycle-Enhanced Network Corridors (see **Figure 3-4A**).

Comment 102-4

P, 3-7 does not include Hyperion Avenue in list of BEN "corridors", but Fig 3-3 does.

Response 102-4

See Response 102-3.

Comment 102-5

The Transit Enhanced Network (TEN) proposed in Figure 3-4 requires significant improvements in the Valley area and Harbor area. If the goal is to get people out of their vehicles, perhaps more emphasis should be placed on the TEN and less emphasis on Pedestrian-Enhanced Zones (PEZ) and Bicycle-Enhance Networks (BENs).

Response 102-5

The TEN was revised (miles added) based on public comments; the updated network maps are shown in **Figure 3-5**. The commenter's concerns/opinions regarding prioritization of the TEN will be forwarded to the decision-maker for consideration in taking action on the project. The RDEIR identified three additional alternatives to the proposed project (one of which, Alternative 5, represented a more comprehensive TEN alternative. Alternative 5 assumes that all streets on the TEN have exclusive bus lanes for the whole day. This alternative would require full conversion of streets on the TEN to exclusive bus only lanes. While this would provide the most benefits for a multi-modal system, it would involve the most intervention to the roadway system. The commenter provides no specific comment on the environmental conclusions of the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 102-6

The methodology and assumptions for projecting greenhouse gas emissions (GHG) associated with Vehicle Miles Traveled (VMT) for Existing Conditions, Future No Project and Future With Project, are briefly discussed in the second and third paragraphs of the Section titled "Impacts". Namely, regional VMT was estimated using the City's Travel Demand Model (TDM), which "utilizes the TransCAD Version 4.8Build 500 modeling software [that] has been calibrated and validated for current conditions." This statement could use more elaboration. For example, does the model assume a linear reduction of emissions with the implementation of BEN, or does it account for the similar volume of vehicular traffic diverted to streets outside of the BEN?

Response 102-6

The traffic model does not assume a linear reduction of VMT (or therefore emissions). Quantification of the reduction in trips (converted from bicycles to other modes) is based on mode share assumptions in the model and not miles of bicycle lanes. See **Master Response 1** regarding the traffic impact assessment methodology.

Comment 102-7

Transit Enhanced Network should have much greater emphasis since a good mass transit system (bus and rail) presents the best potential for separating people from their vehicles.

Response 102-7

See Response 102-5.

Comment 102-8

[Regarding Appendix B-3; Map Atlas of the Mobility Plan:]The scale of the maps is so small that Glendale and Hyperion over the river appear as a single roadway. Thus you can't tell which road is actually referred to in this plan. [The map]Appears to show Glendale and Hyperion (all bridges) as part of the bikeway "priority backbone network." Hyperion is also shown as "Bicycle Enhanced Neighborhood Network" on the "Low Stress Network" map. Can it be both "priority backbone" and "enhanced neighborhood"? The Atlas indicates that the Backbone Network is a subset of the Low Stress Network. A chart or other graphic showing the relationship between the various types of bicycle facilities might be helpful. The individual maps are not numbered, so they can only be identified by the title in the legend, making them harder to find.

Response 102-8

The commenter's concerns regarding the clarity of the maps in the Mobility Plan will be forwarded to the decision-maker for consideration in taking action on the project. The commenter provides no specific comment on the environmental conclusions of the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 103

Scott Morgan
State of California
Governor's Office of Planning and Research
1400 10th Street
Sacramento, CA 95812

Comment 103-1

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Response 103-1

Comment noted. Contact information will be used for clarifications regarding the environmental review process.

LETTER NO. 104

Dave Singleton
Native American Heritage Commission
1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95691

Comment 104-1

The Native American Heritage Commission (NAHC) has reviewed the above-referenced environmental document. This project is also subject to California Government Code Sections 65040.2 et seq. (SB 18) as it amends the City of Los Angeles Circulation Element of the General Plan.

Response 104-1

Comment noted. The City acknowledges its obligation under SB 18 related to the amendment of the Circulation Element of the General Plan. The list of Native American contacts was provided notice of the environmental document but no requests for consultation were made. Since no changes in land use would occur with the circulation development, input from Native American tribes will be limited to disclosure of potential effects and comments on the MP 2035.

Comment 104-2

The California Environmental Quality Act (CEQA) states that any project, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b)). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, pursuant to California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f).

Response 104-2

The RDEIR concluded that impacts to all cultural resources, including archaeological resources, would be less than significant. (RDEIR at Section 6-8 to Section 6-9.) The proposed enhancements to the City's pedestrian facilities, bikeway system, transit network, and street network resulting from the project would involve work within and adjacent to existing rights-of-way that have already been disturbed. Methods of construction for pedestrian facilities, bikeways, transit improvements, and roadway improvements generally involve only minor changes to the surface (e.g. roadway restriping and placement of cycletrack barriers), with a very few improvements requiring excavating to a depth greater than 24 inches. As the proposed project would involve minimal ground disturbance during construction, and any disturbance would generally be in areas where soil has already been disturbed as a result of construction of the existing roadways, impacts to subsurface historical resources, cultural resources, archaeological resources, and human remains are not anticipated. In cases where excavation could go beyond previously disturbed soils, site-specific review would be required as appropriate. If unanticipated archaeological resources were encountered along the enhancement corridors, it is the City's standard procedure that construction would be halted and a qualified archaeologist be retained to review the project plans and monitor all ground-disturbing activities, conducting the proper documentation and analysis. The commenter provides no substantial evidence of an impact to archaeological resources or that shows the need for different environmental conclusions in the Draft EIR. Therefore, there is no basis for further analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 104-3

If there is federal jurisdiction of this project due to funding or regulatory provisions; then the following may apply: the National Environmental Policy Act (NEPA 42 U.S.C 4321-43351) and Section 106 of the National Historic Preservation Act (16 U.S.C 470 at seq.) and 36 CFR Part 800.14(b) require consultation with culturally affiliated Native American tribes to determine if the proposed project may have an adverse impact on cultural resources.

Response 104-3

The project (MP 2035) does not involve any federal funding and does not otherwise fall within federal jurisdiction. The environmental review process being undertaken to prepare an EIR is to satisfy CEQA requirements. If a subsequent project involved federal funding, the City would comply with all relevant federal regulations, including possible compliance with NEPA and Section 106 requirements (including consultation with Native American tribes).

Comment 104-4

We suggest that this (additional archaeological activity) be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. Any information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources.

California Government Code Section 65040.12(e) defines "environmental justice" to provide "fair treatment of People ... with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations and policies." (The California Code is consistent with the Federal Executive Order 12898 regarding 'environmental justice.' Also, applicable to state agencies is Executive Order B-1 0-11 requires consultation with Native American tribes their elected officials and other representatives of tribal governments to provide meaningful input into the development of legislation, regulations, rules, and policies on matters that may affect tribal communities.

Lead agencies should consider first, avoidance for sacred and/or historical sites, pursuant to CEQA Guidelines 15370(a). Then if the project goes ahead' then, lead agencies include in their mitigation and monitoring plan provisions for the analysis and disposition of recovered artifacts, pursuant to California Public Resources Code Section 21083.2 in consultation with culturally affiliated Native Americans.

Response 104-4

The list of Native American contacts has been received and contacts have been provided information concerning the project. Should any regulations, rules, or policies be considered in subsequent projects that could affect resources of concern to Native Americans, then consultation will be undertaken in conformance with Executive Order B-1 0-11. In preparing CEQA documentation, the City complies with CEQA requirements to consider avoidance of sacred and/or historic sites. The commenter provides no specific comment on the environmental conclusions of the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 104-5

Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Response 104-5

It is the City's standard procedure that in cases of unanticipated discoveries, construction be halted and a qualified archaeologist be retained to review, document and address as appropriate any resources and/or human remains. The commenter provides no specific comment on the environmental conclusions of the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 105

Dianna Watson
State of California
Department of Transportation
District 7, Office of Transportation Planning
100 Main Street, MS #16
Los Angeles, CA 90012

Comment 105-1

Good geometric and traffic engineering design to accommodate bicyclists and pedestrians are critical at every on and off ramp and freeway terminus intersection with local streets. Caltrans will work together with the City to look for every opportunity to develop projects that improve safety and connectivity for pedestrians and bicyclists. Opportunities for improvements may exist on State facilities such as: freeway termini, on-off-ramp intersections, overcrossings, under crossings, tunnels, bridges, on both conventional state highways and freeways.

Response 105-1

The MP 2035 is a plan level document and design of improvements will be under taken at a later time as individual projects are implemented. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. The City looks forward to working with Caltrans to implement projects that improve safety and connectivity for pedestrians and bicyclists.

Comment 105-2

Caltrans is pleased with the inclusion of policy 2.10 which states that the City will "support preservation and enhancement of the State highways consistent with the RTP/SCS and the goals/policies of this general plan". We acknowledge programs for Regional Cooperation (MG.7) and State Highway Management (MG.8, MG. 9). Caltrans shares the similar goals with the City of Los Angeles to provide a safe and reliable transportation system for its residents and for goods movement, thus it is committed to cooperate with the City to develop a strategy to interact in all aspects of state highway planning, maintenance, operations, and expansion and to streamline the development review process.

Response 105-2

The commenter's support for future collaboration and coordination with the City on strategic development and enhancement of State highways will be forwarded to the decision-maker for consideration in taking action on the project.

Comment 105-3

Caltrans differs with the City of Los Angeles as to the appropriate traffic impact analysis of state highways for land development projects pursuant to CEQA. Caltrans hopes to work with the City to develop new criteria for analysis and to determine significance of transportation impacts.

Response 105-3

The City met with Caltrans in the Fall of 2013 before issuing the original Draft EIR to explain the level of detail that was available for the MP 2035 and the analysis that was planned along with policy language regarding future coordination with Caltrans as individual projects are designed/implemented. The City looks forward to working with Caltrans on developing new criteria for analysis of land development projects. The commenter's concerns/opinions regarding the traffic impact analysis of State highways with respect to land development projects will be forwarded to the decision-maker for consideration in taking action on the project. The commenter provides no specific comment on the environmental conclusions of the Draft EIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in

the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204[e].)

Comment 105-4

We are encouraged by the new threshold of significance included in the Thresholds of Significance section of the Draft EIR (page 4.1-16) under Circulation system heading, which states: "Based on the criteria set forth in the City of Los Angeles CEQA Thresholds Guide (2006), the determination of significance shall be made on a case-by-case basis ... " Caltrans staff would like to review a sample application to clarify how it is to be applied on freeways. Please contact the undersigned at your earliest convenience to schedule a meeting.

Response 105-4

The commenter's concerns/opinions regarding application of the threshold of significance to freeways (which is not new, but rather already included in the 2006 CEQA Thresholds Guide) will be forwarded to the decision-maker for consideration in taking action on the project. The reference to a sample application is unclear. As noted in the Draft EIR MP 2035 does not include design or implementation of specific projects. The City looks forward to working with Caltrans when the thresholds of significance are updated. The commenter provides no specific comment on the environmental conclusions of the Draft EIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204[e].)

Comment 105-5

In view of SB 743, the Governor's Office of Planning and Research (OPR) is working on developing alternative ways to LOS for evaluating transportation impacts pursuant to CEQA. Caltrans also shares the goal to streamline the CEQA review process for new development and infrastructure projects. Once OPR provides new guidance, Caltrans hopes to collaborate with the City to adopt methods of traffic analysis and new thresholds that are mutually acceptable. In the meantime, Caltrans requests that the City direct consulting traffic engineers to consult with it to determine the appropriate thresholds of significance and analysis methodologies.

Response 105-5

The commenter's concerns/opinions regarding future collaboration on traffic analysis methods and new thresholds will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 15** for the EIR analysis and conclusion on legislative changes and transportation performance metrics. The commenter provides no specific comment on the environmental conclusions of the Draft EIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 105-6

The Mobility Plan 2035 acknowledges that Los Angeles County's CMP has not been successful in addressing traffic congestion on the regional transportation system and it supports Metro's proposal of a congestion mitigation fee that would raise funds for future transportation improvements. Caltrans also supports the congestion mitigation fee concept as it would provide a way for new development to mitigate for their cumulative transportation impacts on state highway facilities, which are currently often overlooked.

Response 105-6

The commenter's concerns/opinions regarding adoption of a congestion mitigation fee will be forwarded to the decision-maker for consideration in taking action on the project. While the MP 2035 does not state that the CMP has not been successful, it does include mobility improvements to provide a multi-modal system to allow travelers more options than driving in an effort to reduce VMT and congestion on the state highway

system. See **Master Response 11** for the EIR analysis and conclusion on the development of the MP 2035. The commenter provides no specific comment on the environmental conclusions of the Draft EIR and provides no substantial evidence supporting different analysis or conclusions from those in the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 105-7

We note table 4.1-22 shows that of the 28 CMP freeway segments in the City of Los Angeles only US-101 north of Vignes operates at LOS "E" during existing conditions. This information seems incorrect as it does not reflect current field conditions. Freeways within the City of Los Angeles are heavily congested during peak commuting periods (i.e., Level of Service "F"). Results on table 4.1-22 seem incorrect in part because the capacity of a freeway lane is assumed to be 2200 veh/hr/lane. For planning purposes Caltrans uses 2000 veh/hr/lane as the capacity of a freeway lane. The 2010 CMP report shows that all 4 monitoring location along US-101 within the City have a V/C greater than 1.00 in the southbound direction. Please contact Caltrans to double check the accuracy of the PeMS data. The information on these tables needs to be corrected as it might affect the credibility of the whole traffic analysis.

Response 105-7

The Congestion Management Program (CMP) is a state-mandated program administered by Metro's 2010 *Congestion Management Program for Los Angeles County* that provides a mechanism for coordinating land use and development decisions. The CMP requires establishment of LOS standards to measure congestion at specific monitoring locations on the freeway and arterial systems. LOS ranges from LOS A to F, with LOS A representing free-flow conditions and LOS F representing a high level of congestion. The CMP was implemented by Metro to analyze the impacts of local land use decisions on the regional transportation system. Since the MP 2035 is not resulting in land use changes within the City of Los Angeles, the CMP analysis is not required. However, for the purposes of showing changes in travel demand on the state highway system within the City, the CMP analysis was conducted for the CMP freeway segments.

In accordance with the CMP guidelines, freeway (mainline) operating conditions during peak periods were evaluated using the general procedures established by the CMP. It should be noted that, in Section 1.1 Introduction of the RDEIR, the lane capacity was updated to reflect 2,000 vehicles per hour per lane (vphpl) as requested in this comment. **Section 4.1 Transportation, Parking and Safety** of the RDEIR (page 4.1-37) identified the 2,000 vehicles per hour threshold and no update to the analysis is required.

As stated in **Section 4.1 Transportation, Parking and Safety** of the RDEIR (page 4.1-37), "Freeway segment volumes based on Caltrans PeMS data were used to establish the CMP LOS conditions during the PM peak hour for existing conditions. The analysis was then performed to evaluate Project conditions for the 28 CMP freeway-monitoring locations within the City of Los Angeles. Data from the City of Los Angeles' Travel Demand Model were used for evaluating freeway mainline segments at the CMP locations in the City of Los Angeles under Project conditions. Evening peak hour information and traffic volumes per direction were collected from the model. Future No Project volumes were calculated as the difference between the model Future No Project volumes and the model Existing volumes added to the existing freeway segment volumes based on PeMS data. Similarly, Future With Project volumes were calculated as the difference between the model Future With Project volumes and the model Existing volumes added to the existing freeway segment volumes based on PeMS data."

The required CMP methodology compares the typical lane capacity for a freeway mainline segment to the number of vehicles traveling on the segment during the peak hour. Due to bottlenecks in the freeway network, vehicle demand can often exceed vehicle throughput resulting in significant reductions in travel speeds and extensive vehicle queuing. When this situation occurs, the number of vehicles passing a CMP monitoring location may be substantially lower than the actual vehicle demand for that location. This results

in an artificially low traffic count at the CMP monitoring station, that when compared to the typical lane capacity, can show better operations (i.e., a lower V/C) than experienced by drivers.

As defined by the CMP, a significant impact occurs when a project increases traffic demand on a CMP facility by 2 percent of capacity ($V/C \geq 0.02$), causing LOS F ($V/C > 1.00$); if the facility is already at LOS F, a significant impact occurs when a project increases traffic demand on a CMP facility by 2 percent of capacity ($V/C \geq 0.02$). Since bottlenecks in the freeway network are resulting in artificially low vehicle counts at some CMP monitoring stations and vehicle LOS experienced by drivers is worse than reported based on the CMP methodology, increases in $V/C \geq 0.02$ for facilities shown to be operating at LOS E or better may also experience a significant impact resulting from the proposed project.

Due to potential impacts to the state highway system, Mitigation Measure **T4** proposes the following language to reduce potential effects:

“In areas where the implementation of the proposed project could potentially affect transportation systems managed by other agencies, such as Caltrans or Metro, or neighboring jurisdictions, the City of Los Angeles shall coordinate with these entities to identify transportation improvements in accordance with the goals and policies of the MP 2035 and seek opportunities to jointly pursue funding. Mobility solutions shall be focused on safety, enhancing mobility options, improving access to active modes, and implementing TDM measures to achieve both local and regional transportation and sustainability goals.”

As discussed above, the traffic analysis presented in the RDEIR was updated to reflect Caltrans comments by, 1) Verifying and updating existing conditions PeMS data, 2) updating analysis capacities to reflect 2,000 vphpl, 3) explaining the limitations of the CMP methodology and that freeway mainline segments may operate worse than reported, and 4) acknowledging that because freeways may operate worse than reported by the CMP, the impact analysis (**Tables 4.1-22 and 4.1-23**) indicate that an increase in $V/C \geq 0.02$ (regardless of LOS) is considered a potentially significant impact to state highway facilities.

Comment 105-8

The channel for Marina Del Rey harbor is a barrier for bike/peds between Venice and Play Del Rey, as well as Ballona Creek Bike Path and further north to Venice. A continuous bike path from Palos Verdes to Santa Monica and beyond would be a great benefit to all beach communities. We suggest a bike/ped bridge over the channel. An interim solution might be a ferry or "waterbus" with regular service and short wait periods.

Response 105-8

The location of the proposed bike/pedestrian bridge over the channel is within Marina del Rey, which is part of Los Angeles County and not within the City of Los Angeles borders. The commenter's concerns/opinions regarding bicycle path continuity improvements in beach communities will be forwarded to the decision-maker for consideration in taking action on the project. Additionally, the commenter provides no specific comment on the environmental conclusions of the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 105-9

We acknowledge mitigation measure T5 which states "In areas where the implementation of the proposed project could potentially affect transportation systems managed by other agencies, such as Caltrans, or Metro, or neighboring jurisdictions, the City of Los Angeles shall coordinate with these entities to identify transportation improvements in accordance with the goals and policies of MP 2035 and seek opportunities to jointly pursue funding." Caltrans concurs. Please coordinate all transit enhancement along Lincoln Boulevard (State Route 1) and vehicular enhancement to Topanga Canyon Boulevard (State Route 27) with Caltrans early in the planning process.

Response 105-9

The commenter's concerns/opinions regarding early coordination with Caltrans on transit and vehicular enhancement matters will be forwarded to the decision-maker for consideration in taking action on the project.

Comment 105-10

Procuring funds toward freeway segments, freeway interchanges, freeway on/off-ramps, as well as for bicycle, bus and rail transit facilities should also be in the goals of the local government agencies. When local matching funds are offered, public funds may become available and improvements may be streamlined and/or expedited.

Response 105-10

Policy 2.13 Highway Preservation and Enhancement of the MP 2035 supports the preservation and enhancement of the State Highways. The commenter's concerns/opinions regarding funding sources for transit and vehicular enhancements will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 9** for the EIR analysis and conclusion regarding funding and implementation of the MP 2035. Additionally, the commenter provides no specific comment on the environmental conclusions of the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 106

Paul Koretz
Councilmember, Fifth District
200 N. Spring Street, Room 440
Los Angeles, CA 90012

Comment 106-1

I would like to first comment on some of the Vehicle Enhanced Network (VEN) features. I have long been troubled by the way our Department of Transportation has gone about implementing and expanding peak hour restrictions on our major corridors. I do agree that in most cases, we increase capacity on our major corridors when we expand peak hour restrictions but, there is often collateral damage as a result. I have been told that prior to my arrival on the Council, many of peak hour restrictions were expanded without any real process for community input, thus denying abutting commercial property owners, businesses and even adjacent residents the full opportunity to express their concerns about impacts. I believe that this process must change if any further expansions of peak hour restrictions are even contemplated.

Response 106-1

Comment noted. The commenter is member of the City Council and, therefore, a member of the decision-making body for this project. The commenter's concerns will be taken in to consideration during the decision-making process. Additionally, the commenter provides no specific comment on the environmental conclusions of the Draft EIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 106-2

I also strongly oppose uniform peak period parking restrictions for our VEN or other major commercial corridors. There have been major commercial business interests located in downtown L.A. and other areas of the city who continue to advocate for this with the Mayor, the Department of Transportation and with others. Their interests appear to override the impacts to numerous small businesses, small commercial property owners, religious institutions and others who would be impacted along some of our key commercial corridors. The most recent effort has been to impose evening peak hour restrictions for the south side of Pico Blvd. along the eastbound lanes from Century City to La Cienega Blvd. Granted, if this were imposed, traffic during evening peak would flow better, but it would cause substantial damage to the mostly small businesses that cater to the mostly Orthodox Jewish community. There are also other constituencies served by this business district which is also constricted by limited off-street commercial district and adjacent residential neighborhood parking. I have rejected such proposals when they have been raised since my arrival in July of 2009. The South Carthay Neighborhood Association has been among our constituency groups who have noted and shared such concerns. I am pleased to see though that Pico Blvd. has not been proposed for the VEN.

I do oppose for the Vehicle Enhanced Network the proposals of uniform peak period restrictions and parking lane conversions for added full-time lanes, which would do great harm to many businesses, commercial property owners and other institutions along these corridors. Each neighborhood and major intersection is unique and must be treated as such when discussing how to improve traffic flow. Treating these corridors in an overly uniform way harms our ability to study and understand the individual characteristics and challenges of each segment. Even if the City had funds to add off-street parking spaces, I have serious doubts that we can compensate for the further loss of hours of on-street parking.

Response 106-2

See **Master Response 3** for the EIR analysis and conclusion regarding the loss of on-street parking and potential effects to businesses and neighborhoods.

Comment 106-3

I do concede that Olympic Blvd. does provide opportunities as a VEN, but speaking only for the portions in my district I see some great challenges. I am concerned about any further erosion of nonpeak hour parking for the residents along or adjacent to this corridor. I have the same concerns for the residents of Highland Ave. in both Council District 5 and 4. Also, along Olympic at major intersections such as La Cienega, Robertson, Westwood and Sepulveda we have significant commercial properties, many of them strip malls that depend upon parking on Olympic during currently available off-peak hours. I am not certain I see the uniform benefit, especially if our neighbors in the City of Beverly Hills don't agree to adopt the same or similar restrictions. La Cienega Blvd. south of Olympic Blvd. also has similar challenges with commercial and residential properties and also a number of busy houses of religious worship and day school facilities between Olympic and 18th St.

Response 106-3

See **Master Response 3** for the EIR analysis and conclusion regarding the loss of on-street parking and potential effects to businesses and neighborhoods. **Master Response 17** provides the EIR analysis and conclusion on the enhanced network treatments on Pico and Olympic Boulevards

Comment 106-4

This document also re-labels streets throughout the City, so I would like to use this opportunity to address a concern that I first raised in 2010 and that had been raised by others prior to my arrival. In March of 2010, I introduced a motion (CF 08-2225) to process a redesignation of Overland Ave between Santa Monica Blvd. and Pico Blvd. from a Secondary Highway to a Collector Street. Doing so will facilitate the underlying goal of controlling traffic in a meaningful way and make Overland Ave. safer for pedestrians and residents. At that time we were told that this change would be made as part of the West LA Community Plan Update. Since that update plan has been on hold, we have not been able to integrate this direction. We see this document as an opportunity to finally make this change. It appears that the direction of this segment of Overland Ave. as a collector would now be considered a Secondary/Ave III. We would like to ensure that this change would finally help the residents of this segment of Overland Ave. reach their goal of the appropriate redesignation they have long been seeking.

Response 106-4

The Citywide General Plan Circulation System Maps provides the new designation for Overland Avenue between Santa Monica Boulevard and Pico Boulevard. As shown, Overland Avenue is shown as a non-arterial (i.e., a collector) street.

Comment 106-5

In my district the most controversial and commented upon item in this document is the Bicycle Enhanced Network (BEN) proposed for Westwood Blvd. I had made clear last year that I oppose the use of Westwood Blvd. for bike lanes and I am disappointed that the Westwood Blvd. option reappears in this document and that the northern segment in the Westwood Village area has been raised as an option of year 2 in the implementation of the Citywide Bicycle Plan. I am requesting that this BEN be removed as part of this document and as part of the earlier approved citywide plan. I also have concerns about the BEN for National Blvd. in the proximity of Overland Ave. This is an already congested area for vehicular traffic primarily because of access to the 10 freeway and I would be concerned about any changes that would potentially reduce vehicular traffic capacity. The City has recently completed a project to widen the Overland Ave. bridge to add vehicular capacity and the implementation of bike lanes here would likely be a step in the opposite direction. I do support the bike lanes that were recently added on National Place because they could be implemented without removing parking or traffic lanes in this residential neighborhood and provide a traffic calming influence for this street.

As National Place continues north and becomes Westwood Blvd. we have other limitations in the segment between National Blvd. and Pico Blvd. Along this segment, changes related to the Expo light rail project at-grade crossing are resulting in the loss of several dozen parking spaces on or adjacent to Westwood Blvd. Expo

is also required as part of its environmental document to maintain two lanes in both directions. Thus, the addition of bike lanes along this segment would result in the further erosion of parking in this single-family residential neighborhood. This further loss of parking would be unacceptable to me and to this wonderful neighborhood.

Response 106-5

See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035.

Comment 106-6

Last year, I had seriously considered the possibility of a plan for bicycle lanes on the segment of Westwood Blvd. between Pico Blvd. and Santa Monica Blvd. I came to the conclusion that any plan would reduce vehicular capacity on this already stressed major corridor. The most recent proposal would reduce capacity during off-peak hours and morning peak in the southbound direction and northbound during the evening peak. This reduced capacity would come at a time when we would also likely see increased bus transit activity on Westwood Blvd. between the Westwood Blvd. Expo station and the UCLA campus, the medical center and the commercial areas of Westwood Village. I also have serious concerns about the continuation of the bike lanes north of Wellworth Ave. because of negative impacts to traffic capacity at the intersection of Wilshire Blvd. and for other potential impacts because of the new narrowness of travel lanes through Westwood Village. I am requesting that all portions of Westwood Blvd. not already striped for bike lanes be removed from consideration as part of the BEN and that we instead focus on exploring other alternatives for north/south bicycle travel on less heavily trafficked residential streets between Westwood and the Palms community. I remain open to the option of Sepulveda Blvd. as the alternative to Westwood Blvd. as the BEN, but I do have a concern with heavy bus transit use on this street with the opening of Expo, the impacts of retaining only a single southbound lane may be very significant.

Response 106-6

See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035. Sepulveda Boulevard is designated as part of the TEN, as it provides a continuous north-south transit connection in the Westside area, and also connects to the planned Expo Phase II that provides east-west service. No improvements to the BEN have been identified on Sepulveda Boulevard and, on the Bicycle Lane Network, Sepulveda has been identified as a “planned bicycle lane.” As stated in **Chapter 3.0 Project Description**, in locations where a transit only lane is installed on a street within the Bicycle Lane Network, the transit lane will serve as the de-facto bicycle lane as bicycles are permitted by State law within transit lanes.

LETTER NO. 200

Westwood South of Santa Monica Blvd. Homeowner's Association
P. O. Box 64213
Los Angeles, CA 90064-0213

Comment 200-1

We do not see where the DEIR has addressed the expected increase in bus traffic and other traffic generated by transit riders accessing EXPO. It is unfortunate that this document is being written before the opening of EXPO Phase 2 so that we do not have actual experience and knowledge of how it is working as we write this document.

Response 200-1

The City of Los Angeles' Travel Demand Model, used to help evaluate potential impacts from the MP 2035, does include the Expo Line Phase 2 project and also includes the available information on all other programmed future bus and rail transit service in the region. See **Master Response 1** regarding the traffic impact analysis methodology.

Comment 200-2

We are very concerned about the safety of those in our community and in the larger region and City as density and congestion increase. Cumulative impacts from EXPO and the recently approved Casden project at Sepulveda and Exposition Blvds. should be included in DEIR analysis. Additional construction planned in Century City will also contribute to EXPO-bound drivers and riders. We do not see that the DEIR document has evaluated any of these impacts. If project impacts go undefined then it is impossible to identify and evaluate mitigations.

Response 200-2

The City of Los Angeles' Travel Demand Model, used to help evaluate potential impacts from the MP 2035, does include the Expo Line Phase 2 project and also includes the available information on all other programmed future bus and rail transit service in the region (as documented in **Appendix C**). The model is also built on the comprehensive land use and socio-economic data developed for the 2012-2035 RTP/SCS, which includes all cumulative land use changes anticipated in the City through year 2035. See **Master Response 1** regarding the traffic impact analysis methodology and **Master Response 13** for the EIR analysis and conclusion on safety with the implementation of the MP 2035.

Comment 200-3

The plan has not examined the potential for cut-through traffic on parallel and surrounding neighborhood streets. It therefore did not identify a set of traffic calming/diversionary measures (with requisite funding) that our neighborhood could implement when off the "enhanced" street and onto surrounding streets. Further, as the City has dismantled the NTMP program and its staff, there currently does not exist the staffing or structure needed to develop and/or implement neighborhood traffic

Response 200-3

Refer to **Master Responses 1, 18, 22 and 23** for the EIR analysis and conclusion of the limits of the Transportation Demand Model, cut-through traffic, the scope of the EIR analysis, and the potential effects of the enhanced networks.

Comment 200-4

While it is entirely laudable to make improvements for bicycles, and it should be a part of our City's Complete Streets Initiative, in our opinion it is unrealistic to remove much-needed traffic lanes on busy arterials to accommodate a small population of bike riders, especially when the installation of those lanes will have serious

negative impacts on the local business community and on the quality of life (and safety) in the nearby neighborhood.

Response 200-4

See **Master Response 2** for the EIR analysis and conclusion on how the conversion of vehicular travel lanes to bicycle facilities could positively affect community character and quality of life. **Master Response 18** provides information for the EIR analysis and conclusion on diversion of vehicles due to travel lane conversions and potential for cut-through traffic.

Comment 200-5

The language in the DEIR that addresses Bicycle Network Enhancements is lofty and undocumented. To state that “Operation of these proposed enhancements would not disrupt existing uses and would be considered compatible with surrounding residential, commercial, industrial, recreational and institutional uses” is incredibly broad and impossible to demonstrate. Each location must be evaluated for impacts such as delay time at traffic signals. The length of the delays to be experienced can then be evaluated for potential for cut-through traffic WSSM hired Art Kassen, a Registered Traffic Engineer/Registered Civil Engineer, to evaluate the proposal for bike lanes on Westwood Blvd. His letter documenting his review of the City’s proposal is attached to this letter and is to be included in our correspondence for the DEIR record. You will note that there will be significant delays to be experienced on Westwood Blvd. should a traffic lane be removed for bicycles or for bike/transit lanes. Those delays will result in neighborhood intrusions that will have unacceptable impacts on nearby streets--- streets where children regularly walk to Westwood Charter Elementary School. The dislocation of Westwood Blvd. traffic onto nearby residential streets would result in a gridlocked community where parents would likely abandon allowing their children to walk or bike to school (thus contributing to addition VMT). Impacts on local businesses would also be significant.

Response 200-5

The statement asserting the compatibility of the proposed transportation improvements is appropriate for a plan level evaluation. As stated in the **Section 4.2 Land Use and Development** of the EIR, the operation of the proposed project would occur along existing developed streets throughout the City of Los Angeles and the proposed project would not result in the conversion of existing land uses to a new use (i.e., uses would remain as transportation), such that an incompatibility would result. Transportation infrastructure is compatible with most urban land uses because it allows accessibility and the improved operational efficiency of those uses. Specifically, proposed pedestrian, bicycle, vehicle, and transit enhancements would improve mobility and create a more pedestrian friendly atmosphere.

As described in **Section 4.1 Transportation, Parking and Safety**, the EIR acknowledges that the proposed project would have a significant impact to the circulation system (**Impact 4.1-2**), and that traffic operations with the Westside APC would be worsened for vehicle traffic and traffic delays and identifies the plan as creating significant unavoidable impacts associated with increased traffic delays and cut through traffic. However, City staff are recommending to the City Council that on balance these impacts should be considered acceptable to meet the goals and objectives of MP 2035 and the regional 2012-2035 RTP/SCS. The City Council will need to adopt a Statement of Overriding Considerations to approve the MP 2035 in spite of its significant unavoidable impacts to traffic in West Los Angeles and other areas of the City. Notwithstanding the conclusion of significant impacts to traffic, the EIR traffic analysis demonstrates that the overall VMT would be reduced in the Westside APC with the implementation of MP 2035, and the new CEQA guidelines will place an emphasis on reduction of VMT over vehicle delay/LOS. See **Master Response 1** regarding the traffic impact analysis.

See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035. See **Master Response 2** for the EIR analysis and conclusion impacts to businesses and quality of life from travel lane conversions, and

Master Response 18 for the EIR analysis and conclusion of cut-through traffic. See **Master Response 22** for the level of analysis presented in the EIR given the programmatic level of analysis completed for the EIR, and **Master Reponse 23** for the EIR analysis and conclusions on the potential effects of the Enhanced Networks.

Comment 200-6

Our Association voted long ago to allow street parking (1 or 2 hour parking) on our residential streets so that we could support the vitality of our local business community. We knew that peak hour parking restrictions limited parking on one side of Westwood and that merchants would have a difficult time surviving with the limited parking that remained. It is not infrequent to find Westwood Blvd. parking occupied and the spaces on nearby streets also filled. With a large number of restaurants, patrons stop by to eat and/or to pick up “to go” items. Losing the parking on Westwood would be a significant negative impact for the small restaurants and businesses. Only a few have adequate on-site parking. Those parking impacts are completely ignored in the section on parking. The DEIR is incorrect and inconsistent with the determination that there would be “no impacts related to land use compatibility.” The report goes further to hypothesize that the project’s loss of parking spaces could increase VMT that would “typically be off-set by a reduction in vehicle trips due to others who are aware of constrained parking conditions.” To conclude that “Therefore the proposed project would result in less-than-significant impacts related to parking,” is not supportable for our community and for Westwood Blvd. merchants. Those merchants have come to our Homeowner Association meetings to ask for our support and help. There is no BID or business association that represents them. How will parking shortfalls be mitigated? Parking is further complicated in the area because Westwood Charter School does not have parking for the majority of its staff and faculty members. They are given parking permits in the residential area in the blocks east of Westwood Blvd. Furthermore, the blocks south of (and closest to Santa Monica Blvd.) are zoned for multi-family housing and the demands for parking on those streets is particularly strong as smaller apartments house multiple tenants.

Response 200-6

The proposed project would result in a loss of parking spaces that could increase VMT if people drive farther to find parking or seek an alternate destination with more convenient parking. However, this increased VMT would be expected by the City, based on experience and observations by City Planning and the City of Los Angeles Department of Transportation staff and the Fehr and Peers consultants, to be off-set by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts that may result from a shortfall in parking are anticipated to be minor and other transportation analyses reasonably address potential secondary impacts. Therefore, the proposed project would result in less-than-significant traffic impacts related to parking. See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035. See also **Master Response 1** regarding the traffic impact methodology and **Master Response 3** for the EIR analysis and conclusion regarding loss of on-street parking and impacts to businesses.

Comment 200-7

Mr. Kassen’s attached letter raises the issue of emergency response time which is very important given that Westwood Blvd. is often the route taken by emergency vehicles transporting patients to UCLA Medical Center. Peak hour levels of service at key intersections is already at gridlock.

Response 200-7

See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035. The EIR identified a potentially significant and unavoidable impact related to emergency vehicle access and response times. **Master Response 14** addresses the EIR analysis and conclusion for emergency vehicle access and response times.

Master Response 12 addresses the EIR analysis and conclusions for project alternatives. Routes for each enhanced network are identified in MP 2035 based on community input, but as indicated in the project description, specific routes for enhancements for each mode will be evaluated on a project-by-project basis and will be evaluated in environmental documents as appropriate. As necessary and appropriate, alternatives to each enhancement will be evaluated in detail. While the MP 2035 identifies suggested streets to comprise the Networks and/or Districts, it is important to note that, at the time that funding becomes available to implement network or district improvements within a selected corridor, that land use and/or transportation investments may have altered the landscape in such a way to warrant the consideration of an alternative street than is initially identified in the MP 2035. Should an alternative street be determined to better serve the needs of the individual network (than the street originally identified), it is expected that the alternative would serve users similar to the originally selected street. The MP 2035 is intended to provide for a flexible and iterative process based upon prioritization criteria, funding, roadway capacity, community support and political interest.

Comment 200-8

EIR documents for major projects in Century City identify the intersection of Westwood and Santa Monica Blvds. as one that will experience additional negative impacts but one for which there are no additional mitigations available. Added congestion translates to added air and noise pollution and the generation of additional greenhouse gases. The quality of life in the residential community would be negatively impacted by cut-through traffic (from local drivers and commuters) and the businesses would suffer as customers would be unwilling to deal with the congestion and parking problems and would instead spend their dollars elsewhere. In some instances sales tax revenues could be lost from Los Angeles to nearby Beverly Hills or even to Santa Monica depending on the origin of the commuter. The loss of local merchants would result in a change of neighborhood character. If small businesses are unable to survive, the retail spaces will go unrented thus ushering in an accelerated redevelopment of the street. Perhaps this is the unstated goal of the City? If so, we do not support this stealth approach to community planning. Would the added bicycle trips on Westwood Blvd. cancel out the myriad of negative impacts identified? We think not. The DEIR is long on assumptions and short on specifics. The alternatives are too broadly stated and as a result, mitigations are only broadly mentioned and cannot be assessed, implemented or evaluated from the information provided.

Response 200-8

The traffic analysis for the project did not perform an intersection-level analysis; the MP 2035 EIR is a programmatic document that addresses impacts at an area level based on preliminary conceptual level information. See **Master Response 1** regarding traffic analysis methodology. See **Master Response 12** for the EIR analysis and conclusion of project alternatives and **Master Response 22** for the scope of the EIR analysis.

See **Master Response 4** for the EIR analysis and conclusion regarding potential air quality effects.

Regarding climate change, GHG emissions are a global concern without a localized affect directly related to the emissions. For the proposed project, GHG emissions related to changes in transportation policy and facilities are broadly assessed based on regional VMT (in the traffic-centric model). **Table 4.4-4 in Section 4.4 Greenhouse Gas Emissions** shows the total GHG emissions for Existing Conditions, Future No Project, and Future With Project in each Area Planning Commission (APC). It is anticipated that mobility enhancements associated with the proposed project combined with emission controls (Future with Project Conditions) would reduce GHG emissions by 7 million metric tons per year when compared to existing emissions (38 percent reduction) and would reduce GHG emissions by 22,000 metric tons per year when compared to Future No Project condition (less than 1 percent reduction). **Table 4.4-5** shows, for each APC, the comparison of Future with Project emissions to Existing Conditions and Future No Project emissions. Although it is estimated that regional growth would result in increased regional VMT, the implementation of mandatory regulatory requirements (California Code of Regulations, Section 1961 (Exhaust Emission

Standards and Test Procedures - 2004 through 2019 Model Passenger Cars, Light-Duty Trucks, and Medium-Duty Vehicles) regarding GHG engine emission standards, known as the Pavley Rules, would substantially reduce tailpipe GHG emissions. Therefore, the impact related to GHG emissions is considered less-than-significant.

Regarding noise, congested roadways generate less noise than free-flowing roadways. According to the Table 5-17 of California Department of Transportation Technical Noise Supplement (November 2009). A light-duty automobile traveling 20 miles per hour generates a noise level of 57 dBA and the same automobile traveling 30 miles per hour generates a noise level of 62 dBA. An idling light-duty automobile generates a noise level of 55 dBA. Therefore, reduced vehicle speeds from increased traffic congestion would result in decreased noise levels.

The proposed project is not anticipated to result in the loss of local businesses. Typically, a large portion of the local merchant's customer base derives from local community members, a service area which extends out approximately 0.5 miles.⁴⁴ The proposed improvements would provide enhanced accessibility for non-vehicular modes of transportation, which would increase accessibility to residents that live in close proximity to local goods and services. See **Master Response 2** for the EIR analysis and conclusion regarding business disruption, community character, and quality of life. **Master Response 18** provides the EIR analysis and conclusion on diversion of vehicles due to travel lane conversions and potential for cut-through traffic.

See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035. The MP 2035 is a Plan-level document and due to the size of the transportation network, the EIR for the MP 2035 evaluates the environmental impacts on a City-wide level with Area Planning Commissions (APCs) as subareas. Feasible, appropriate mitigation measures are provided, where significant impacts have been identified, to reduce effects to the greatest extent possible given the planning-level detail available at the present time.

Comment 200-9

Regarding pedestrian safety: We note that on many streets, the placement of bus shelters creates barriers to passage for pedestrians.

Response 200-9

Comment noted. Bus shelters must be placed to comply with Americans with Disabilities Act (ADA) regulations and cannot be placed in a location that would create a barrier to pedestrians for pedestrians. See **Master Response 24** regarding pedestrian safety and other vulnerable populations. As the necessary details and funding become available prior to implementation of each project, additional environmental documentation would be required for each of the proposed mobility improvements identified in the MP 2035. The level of environmental review required would depend on the size of the project and potential for impact. All roadway alterations that would potentially incur localized impacts would require additional analysis and environmental documentation once design details are known.

Comment 200-10

Additionally, we remember that, City policy does not require traffic studies to be completed for residential projects of fewer than 49 units. On many blocks in the area where duplex, triplex and small unit properties were located, new projects (some taking advantage of bonus density opportunities) have been replaced by larger multi-unit buildings. The traffic impacts of those projects is never evaluated because they fall beneath the threshold for traffic impacts. However, if you add them all together, it is likely that one would find significant

⁴⁴Chiara, Joseph, *Urban Planning and Design Criteria*, page 479, May 15, 1975.

additional impacts and if mitigation funds were levied, better bike facilities could be built. Funds might then be raised to construct the bike veloway once proposed for the UCLA/West LA communities.

Response 200-10

Comment noted. The EIR does not evaluate potential impacts from land use changes unrelated to the implementation of the MP 2035. The EIR evaluates potential impacts on the vehicular circulation network at a programmatic level using the City of Los Angeles' Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions based on SCAG's 2012-2035 RTP/SCS.

ATTACHMENT TO LETTER NO. 200

Arthur L. Kassan
5105 Cimarron Lane
Culver City, CA 90230

Comment 200-11

With implementation of the bicycle lane plan, the delays to all traffic along Westwood Boulevard, Sepulveda Boulevard, and Bundy Drive will increase substantially. The increases will be much higher than the estimates in the DEIR, because those estimates do not take into account any identifiable developments and changes in infrastructure after the year, 2013.

Response 200-11

As stated in **Chapter 1.0 Introduction** and **Section 4.1 Transportation, Parking, and Safety** of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles' Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions in accordance with the 2012-2035 RTP/SCS (as documented in **Appendix C**). As part of the FEIR, the existing conditions analysis is being updated to reflect 2014 conditions (see **Section 3.0 Corrections and Additions** for pages 4.1-14, 4.1-15, 4.1-32 through 4.1-34); this update did not affect the EIR conclusions. See **Master Response 1** regarding the traffic impact analysis methodology. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

Comment 200-12

The substantial increases in delay along the arterial streets will result in diversions of commuter traffic and other through traffic from the congested arteries to the grid patterns of local residential streets within the neighborhoods adjacent to Westwood Boulevard and Sepulveda Boulevard.

Response 200-12

See **Master Response 18** for the EIR analysis and conclusion of traffic diversion and cut-through traffic.

Comment 200-13

Due to massive cutbacks in LADOT personnel, the Neighborhood Traffic Management Program has been abolished, and the staff that was dedicated to that program has been assigned to other sections within the department. 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. I do not believe that the guarantee can be made with confidence because of the LADOT understaffing.

Response 200-13

The commenter's concerns/opinions regarding the LADOT's ability to maintain long-range monitoring in the program area will be forwarded to the decision-maker for consideration in taking action on the project. **Master Response 18** provides the EIR analysis and conclusion of traffic diversion and the proposed mitigation measure. As stated in the EIR (**Section 4.1 Transportation, Parking and Safety**, page 4.1-35), the implementation of Mitigation Measure **T3** would reduce the level of impact related to neighborhood intrusion but impacts could remain potentially significant and, therefore, the EIR concludes the impacts associated with cut-through traffic are significant and unavoidable. Mitigation Measure **T3** is consistent with LADOT's Great Streets for Los Angeles Strategic Plan that identifies the need to protecting neighborhoods from traffic intrusion and vehicle speeding.

Comment 200-14

The substantial increases in delay along the arteries with bicycle lanes will have significant impacts on the emergency vehicle access and response times.

The emergency services depend on the arterial street system for their routes to and from neighborhoods or to and from locations along the arteries themselves. In addition to fire and police vehicles serving the area in general, ambulances and paramedic vehicles connect the area with the intensive medical center at UCLA.

Response 200-14

See **Master Response 14** for the EIR analysis and conclusion of emergency access and response times. The EIR determined that potentially significant and unavoidable impacts could occur related to emergency access and response times.

Comment 200-15

There is no DEIR documentation that the increases in delay will have no impacts on emergency services. The DEIR must be expanded to treat this subject with more seriousness, especially considering the aging population on the Westside that will have increasing needs for the emergency services.

Response 200-15

See **Master Response 14** for the EIR analysis and conclusion of emergency access and response times. The EIR determined that potentially significant and unavoidable impacts could occur related to emergency access and response times.

Comment 200-16

The commercial areas along Westwood and Sepulveda boulevards primarily consist of small businesses in older buildings without meaningful on-site, off-street parking. The businesses depend on the parking along the boulevard frontages for most of their patronage. On both boulevards, the blocks between cross streets are long, from a pedestrian viewpoint. It will not be attractive to park on one of the cross streets and walk to businesses in the middle of such blocks. To travel to or from the cross street parking spaces, if any will be available, many drivers will use the neighborhood residential streets and avoid the congested arteries.

Response 200-16

See **Master Response 18** for the EIR analysis and conclusion of cut-through traffic, **Master Response 3** for the EIR analysis and conclusion of parking, and **Master Response 22** for the explanation on why the scope/level of analysis in the EIR is appropriate. In addition to direct impacts, the EIR also considered and evaluated secondary and cumulative impacts of the proposed MP 2035. No removal of parking along Westwood or Sepulveda Boulevards would occur under the proposed project.

Comment 200-17

“Also loss of parking could result in land use changes.” [page 4.5-27] By “land use changes”, does the DEIR author mean that small, family-owned businesses that have been on the boulevards for years or decades would be forced out of business to be replaced by large, national chain stores that can build larger buildings with on-site parking, but which have no long-term ties to the community? The results of such changes will significantly impact the character of the community.

Response 200-17

The loss of on-street parking would occur only on the VEN, which are transportation corridors designed to facilitate high traffic volumes. See **Master Response 3** for the EIR analysis and conclusion of impacts to business from the loss of on-street parking. See **Master Response 2** for the EIR analysis and conclusion regarding potential changes to community character.

Comment 200-18

Merely listing the numbers and locations and times of the losses is not an impact analysis. What happens to the small businesses and their employees when convenient parking is not available? How many additional miles of travel are added for patrons who travel elsewhere to purchase the goods and services that they can buy now in their neighborhood or by stopping on their way to and from other locations?

Response 200-18

See **Master Response 3** for the EIR analysis and conclusion of loss of parking.

Comment 200-19

“The project would result in a loss of parking spaces that could increase VMT [vehicle miles of travel] if people drive further to find parking or seek an alternative destination with more convenient parking. However, this increased VMT would typically be off-set by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area and its impacts would be considered less than significant.” [page 4.5-29] That is not an analysis. It is an opinion with no documentation or proof. Again, the phrase “... reduction in vehicle trips ...” means a reduction in local business.

Response 200-19

See **Master Response 18** for the EIR analysis and conclusion of cut-through traffic and **Master Response 3** for the EIR analysis and conclusion of loss of parking.

Comment 200-20

“... transit would be impacted along with vehicular traffic on streets where there would be no transit lane and therefore impacts to transit would be significant and unavoidable.” [page 4.5-35] The goal of building the Exposition Light Rail Line is to make transit use more attractive on the Westside. One important component of the transit system will be convenient and attractive bus service to the rail stations so commuters and others do not have to drive and park or be driven to the stations. Enhanced connections to UCLA and Century City will also be desirable potential components of the transit system. The proposed bicycle lane project will be contrary to those components of the transit enhancement goal, based on the DEIR finding quoted at the beginning of this paragraph.

Response 200 -20

In consideration of the multiple transportation demands on Westwood Boulevard, now and in the future, with the opening of Expo Phase II, the MP 2035 proposes to include Westwood Boulevard on the TEN while retaining existing short portions on the BEN (north of Santa Monica Boulevard to Le Conte Avenue). The TEN designation on Westwood Boulevard is proposed as a moderate enhancement which would not remove

a vehicle travel lane. Remaining portions of Westwood Boulevard would retain their existing bicycle lanes. Recognizing that all bicyclists may not be comfortable riding on the portions of Westwood Boulevard without a protected bicycle lane, streets parallel to Westwood Boulevard on the NEN could provide an option for bicyclists who desire a calmer bicycling environment.

The commenter's concerns/opinions regarding the Exposition Light Rail Line and connecting bus service will be forwarded to the decision-maker for consideration in taking action on the project. Bus access, as well as bicycle and pedestrian access, are all important connections to provide to transit systems. The MP 2035 provides a roadmap for achieving a transportation system that balances the needs of users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation.

Comment 200-21

Mixing large motor vehicles (buses) with the much smaller bicycles may have secondary impacts that must be considered. Many of the bicycles will travel more slowly than the buses, causing delays or lane switching by buses. Peddling a bicycle behind one or more diesel engine buses cannot be either pleasant or healthful. There will be a safety issue resulting from mixing two types of vehicles with vastly different sizes and movement characteristics.

At the hearing, a scheme for a "floating bicycle lane" was presented. It was not clear to most members of the audience what the scheme would involve and how it would be implemented. It would be helpful if comprehensible information about floating bicycle lanes were made available and the potential impacts of such a scheme were to be analyzed thoroughly before a comprehensible presentation at a future hearing and before being seriously considered for implementation.

Response 200-21

The commenter's concerns/opinions regarding potential safety issues from bus-bicyclist interaction will be forwarded to the decision-maker for consideration in taking action on the project (State law allows bicyclists in bus lanes.) The comment states that peddling a bicycle behind one or more diesel engines buses cannot be healthy or pleasant. See also **Master Response 4** for the EIR analysis and conclusion regarding air quality effects. The health effects from buses on bicyclists would be counterbalanced by the positive benefits to health from the physical activity; however, there is no data available that quantifies the relative health impacts of bicycling in urban areas. The majority of buses operating within the City of Los Angeles are powered by alternative fuels that do not emit the most harmful Toxic Air Contaminants (TACs) associated with diesel-fueled vehicles – Diesel Particulate Matter. Health effects of TACs and Diesel Particulate Matter are discussed in **Section 4.3 Air Quality**, in the discussion of pollutants and effects. The entire bus fleet operated by the Los Angeles County Metropolitan Transportation Authority is powered by compressed natural gas.

As to the commenter's comments related to floating bicycle lanes, floating bicycle lanes are an option in the Complete Streets Design Manual to provide flexibility for parking restrictions during certain times of the day. Floating bicycle lanes are in the National Association of City Transportation Officials (NACTO) design guide. Here is an overview from the Complete Streets Design Manual:

When parking is allowed, bicyclists use the floating bicycle lane where cars were previously parked between a 4-inch wide white stripe and the curb. When parking is not allowed, bicyclists move to the right and share a wide travel lane or Shared Lane Marking pavement treatment. On roadways where there is a part time parking prohibition, yet there is a demonstrated need for bicycle travel through the corridor, it may be feasible to install a floating bicycle lane or double row of Shared Lane Markings to provide bicycle accommodation.

Floating bicycle lanes would have less impact on traffic as compared to removal of a travel lane (which is analyzed in the EIR) and would not result in significant impacts to safety.

See also **Master Response 13** for the EIR analysis and conclusion regarding bicycle safety.

Comment 200-22

Based on the many unresolved environmental issues and the secondary impacts that have not been addressed or have been addressed without documentation, the Westwood South of Santa Monica Boulevard Homeowners Association requests that consideration of the installation of bicycle lanes on Westwood Boulevard and Sepulveda Boulevard as proposed be eliminated from this project and that no action be taken in regard to bicycle lanes on those two streets, and others, until a more intensive, complete, and credible environmental analysis has been completed and reviewed by the public.

Response 200-22

The EIR, as required by CEQA, addresses direct, indirect, and cumulative effects of the MP 2035. The comment is non-specific in regards to which issues have not been addressed. See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035. No improvements to the BEN have been identified on Sepulveda Boulevard and, on the Bicycle Lane Network, Sepulveda has been identified as a “planned bicycle lane.” As stated in **Chapter 3.0 Project Description**, in locations where a transit only lane is installed on a street within the Bicycle Lane Network, the transit lane will serve as the de-facto bicycle lane as bicycles are permitted by State law within transit lanes.

The EIR, as required by CEQA, addresses direct, indirect, and cumulative effects of the MP 2035. The comment is non-specific in regards to which issues have not been addressed. Finally, the commenter provides no substantial evidence supporting different analysis or conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Additionally, the commenter provides no substantial evidence arguing for alternative analysis or conclusions from those in the Draft EIR. Therefore, no response is required. (CEQA Guidelines, Section 15088.)

See Master Response 10 regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035. No improvements to the BEN have been identified on Sepulveda Boulevard and on the Bicycle Lane Network Sepulveda has been identified as a “planned bicycle lane” but is not expected to be prioritized for installation prior to 2035.

LETTER NO. 201

Jeff Jacobberger
Bicycle Advisory Committee of the City of Los Angeles

Comment 201-1

For example, the Draft EIR indicates that, with implementation of the Mobility Element, bike mode share is predicted to increase to 2.3% in 20 years. The experience of New York; Washington, DC; Portland, OR; and local cities like Santa Monica and Long Beach suggest that, with a real commitment to bike infrastructure, bike mode share in Los Angeles would easily be much higher than that. What impact would a significantly higher mode share for biking and walking (and scooters and skateboards) have on air quality, or greenhouse gas emissions? The Mobility Element and EIR provide no analysis or information about options that might be environmentally superior to the anemic proposals in the draft plan. That is entirely contrary to the purpose of CEQA.

Response 201-1

See **Master Response 1** for additional information regarding the traffic impact analysis methodology and the vehicle-centric nature of the analysis. While staff agree with the commenter that bicycle mode share could be substantially higher than 2.3% in 2035 (and that is the City's aim), the 2.3% mode share represents a conservative assumption based on available data for purposes of assessing impacts to traffic in a CEQA document. Assuming a greater mode share would result in fewer traffic impacts (as well as less emissions and reduced noise) but would not serve any purpose under CEQA. The purpose of CEQA documents is to disclose potential impacts based on conservative (reasonable worst case) assumptions. The MP 2035 improves on the 2010 Bicycle Plan by including a protected bicycle lane network that, together with the NEN and other bicycle lanes is designed to encourage a substantially greater number of bicyclists. Further expansion of the bicycle network beyond what is proposed in MP 2035 would not increase the bicycle mode share assumption contained in the EIR because there is currently no applicable data to support such an increase (again see **Master Response 1**). However, over time as bicycle mode share increases the City will adjust its traffic model and analyses accordingly.

See **Master Response 12** for the EIR analysis and conclusion regarding the additional alternatives developed and analyzed in the RDEIR.

Alternatives that would increase the amount of transportation infrastructure and mobility improvements were initially considered during project development; however, the implementation of mobility improvements aimed at pedestrian, bicycle, or transit would compete with space allocated for vehicular travel (within the public right-of-way) and would result in increased environmental impacts to vehicular delay and congestion. Alternatives that implemented mobility improvements aimed at vehicular travel would compete with space allocated for pedestrians, transit, and bicycles (within the public right-of-way) and would increase impacts related to pedestrian and bicycle safety, and would not be consistent with the goals and objectives of the project. Alternatives that would extend improvements beyond the existing right-of-way for transportation would be infeasible as they would require extensive right-of-way acquisition and the associated costs and impacts to businesses and residences would be significant.

As discussed in **Master Response 12**, Alternative 5 provides a more intensive project than the proposed project. Specifically, this alternative would require full conversion of streets on the TEN to exclusive bus only lanes, which could result in potentially fewer impacts to safety and pedestrian and bicyclists. While this would provide the most benefits for a multi-modal system, it would involve the most intervention to the roadway system which would exacerbate congestion and delay compared to the proposed project. An alternative which maintains the amount of vehicle lanes and implements exclusive bus only lanes (to minimize increases in congestion and delay), would be infeasible as it would require extensive right-of-way acquisition and the associated costs are not reasonably foreseeable. In addition, the proposed project

represents a more robust implementation of bicycle infrastructure than was originally considered as part of the proposed project in the initial Draft EIR (now identified as Alternative 3 in the RDEIR). Similar to Alternative 5, any additional implementation of increased bicycle infrastructure would exacerbate congestion and delay if improvements were implemented within the existing transportation infrastructure or would result in impacts to businesses and residents, as well as infeasible costs, if improvements were implemented outside the existing transportation right-of-way.

Comment 201-2

The Planning Department and draft Mobility Element attempts to justify the massive deduction in the quantity of bike infrastructure by claiming that it is a shift in focus to high-quality infrastructure. Respectfully, this claim is deceptive, because the Mobility Element makes no firm commitment to cycle tracks. The Backbone streets selected for inclusion in the BEN are slated for standard bike lanes in the current Bike Plan. The Mobility Element states that they might be upgraded, “as time and money permit,” to higher-grade facilities. Elsewhere, it is clear that the Mobility Element makes no commitment to provide the staff and financial resources necessary to implement bike infrastructure. This is an empty promise.

Moreover, the promise of “buffered” bike lanes is not a real improvement from the 2010 Bike Plan. Many streets in the 2010 Bike Plan (e.g., Colorado Boulevard, portions of Martin Luther King, Mid City’s San Vicente Boulevard) have received or will receive buffered bike lanes because the street width, medians, etc. make that the most logical configuration. On other streets in the BEN (e.g., Melrose, San Vicente in Brentwood Village, Ohio Street), the traffic volumes, business/residential reliance on street parking, etc. make it extraordinarily difficult to imagine how a cycle track, or anything more than standard bike lanes, could fit on the street.

If the City is going to limit its commitment to the BEN, the Mobility Element and EIR must contain a preliminary engineering analysis of what types of bike infrastructure could be installed on each street, and what that means in terms of travel lane and/or parking removal. When the Mayor and City Council adopt a Mobility Element that makes promises, they must understand what they are promising. The 2010 Bike Plan was adopted by a unanimous City Council, with promises to fully implement the plan.

Response 201-2

The RDEIR includes additional model analysis that considers a more comprehensive analysis of installing bicycle lanes. Bicycle lanes on corridors not designated as enhanced networks are assumed to require a conversion of a vehicle travel lane. In the previous Draft EIR, it was assumed that bicycle lanes would not reduce vehicular roadway capacities.

The Bicycle Lane Network represents a 775-mile system of bicycle lanes that includes the 719 miles of lanes referred to as the Backbone Network in the 2010 Bicycle Plan, as well as additional lanes that were either installed since 2010. On the 775-mile Bicycle Lane Network, 264 miles are intended to be upgraded as Class IV/Cycle Tracks and the future condition is also represented on the BEN map. While the bicycle lanes in the 2010 Bicycle Plan were included in the MP 2035, the full impact of installing the bicycle lanes to the transportation system was not fully analyzed in the Draft EIR (i.e. no impacts to vehicle capacity were assumed). The impact of the Bicycle Lane Network (assuming that bicycle lanes on corridors not designated as enhanced networks would require a conversion of a vehicle travel lanes) was analyzed as part of the proposed project in the RDEIR.

See **Master Response 9** for the EIR analysis and conclusion on funding and implementation of the MP 2035.

The RDEIR assumes that one travel lane in each direction will be converted to accommodate the BEN and analyzes potential impacts to the vehicular circulation system accordingly. No detailed engineering plans are available at this time and would be part of an implementation process to occur at an unknown time in the future depending on prioritization criteria, funding, roadway capacity, community support and political interest.

Comment 201-3

Page 10: The mode shares reported for different transportation modes do not match the mode shares reported in the EIR. These have important implications for transportation policy. Are 12% of trips in Los Angeles by transit as stated here, or 3% as stated in the EIR? Are 6% of trips by active transportation as stated here, or 15% as stated in the EIR? There is a fundamental requirement to use accurate data in the EIR, and to have accurate data used as the basis for establishing the policies in the Mobility Element. Quite simply, the wholly inconsistent numbers make it impossible for anyone evaluate the objectives and policies in the Mobility Element.

Response 201-3

The mode shares reported in the MP 2035 are based on the 2009 National Household Travel Survey values for Los Angeles County; the survey was conducted over a period from March 2008 through May 2009 and did not sample enough households to provide mode share results specific to the City of Los Angeles. The mode share analysis in the Draft EIR/RDEIR is based on the City's Travel Demand Forecasting Model, which provides results for the peak travel period for the City of Los Angeles under existing conditions. As stated on page 4.1-11 of **Section 4.1 Transportation, Parking and Safety**:

“The City of Los Angeles’ Travel Demand Forecasting Model (travel demand model or model) estimates the mode split of existing peak period person trips within the City. Overall, over 80 percent of peak period person trips are made by automobile, over 14 percent are made by walking, over 3 percent by transit, and nearly 1 percent by bicycle. **Table 4.1-3** provides additional existing mode split detail by APC and **Table 4.1-4** provides a summary of peak period person trips by mode for all trips occurring in the City. By comparison, the survey-based SCAG Profile of the City of Los Angeles reports that 82 percent of year 2012 journey-to-work trips were made by auto, 12 percent by public transit, and 6 percent by other modes. Since the purpose of most transit trips nationwide is work (59.2 percent), it is reasonable to expect a higher transit mode share for journey-to-work trips than for peak period trips of all purposes.

SCAG is currently updating the regional travel demand forecasting model for use in the 2016 Regional Transportation Plan and is in the process of updating the mode split data within the region. Given the investments in additional transit and bicycling facilities over the last several years, the mode split data is expected to show a decrease in the number of auto trips with a corresponding increase to other modes.”

Comment 201-4

Policy 5.2 Alternative Metrics: It is not enough for the City to “support the adoption of alternatives to the traditional Level of Service.” The City should adopt for its own use CEQA standards and thresholds that promote active transportation and transit.

Response 201-4

See **Master Response 15** for the EIR analysis and conclusion on legislative changes under SB 743 and transportation performance metrics. The City is responding to the legislative changes by initiating a work program to adopt a new transportation-related CEQA impact thresholds. The Department of City Planning has received a grant from the Strategic Growth Council as part of the State's Sustainable Communities Planning Grant and Incentives Program to fund the research framework that will inform selection of a vehicle miles traveled (VMT)-based metric to define what constitutes a transportation impact under CEQA. Staff currently estimates that the City will adopt a new transportation-related CEQA threshold within the timeframe required by SB 743.

Comment 201-5

The fundamental purpose of an EIR is to provide policymakers with an evaluation of the environmental costs and benefits of a range of potential actions. Here, the EIR provides absolutely no evaluation or analysis of the

environmental consequences of a plan that is more pro-bike or pro-pedestrian than the draft Mobility Element, despite the fact that it represents a wholesale retreat from the 2010 Bike Plan. This does not allow for a fair evaluation. For example, those who advocate for greater emphasis on active transportation are provided with no information about the potential public health, air quality or climate change benefits of a more aggressive program, while opponents of any improvements are provided with information about traffic congestion impacts. The document absolutely fails to present a range of alternatives from which policymakers could choose.

Response 201-5

See **Master Response 2** for the EIR analysis and conclusion on how the conversion of vehicular travel lanes to bicycle facilities could positively affect community character and quality of life. See **Master Response 13** for the EIR analysis and conclusion of bicycle safety. See **Master Response 12** for the EIR analysis and conclusion of project alternatives. See Response 201-1 for a discussion of the feasibility of additional alternatives.

Comment 201-6

It appears that the EIR's analysis of GHG emissions starts and ends with the conclusion the City can meet all of its reduction targets by improvements to tailpipe emissions. There is no discussion or analysis of the role that active transportation can play in reducing GHG emissions,, and thus fails to provide decisionmakers with information about a range of options that might lead them to adopt policies that are more favorable to active transportation.

Response 201-6

See **Master Response 1** regarding traffic analysis methodology and the vehicle-centric nature of the analysis. The GHG analysis in **Section 4.4** of the RDEIR focused on assessing potential impacts in accordance with Appendix G of the State CEQA Guidelines. The analysis included a comparison of project-related emissions to Existing and Future No Project conditions. Impacts are also assessed based on consistency with GHG reduction plans, including the RTP/SCS, the City's community plans, and SB 375 reduction goals. Impacts were determined to be less-than-significant and no additional analysis is required related to the CEQA Guidelines.

Discussion of consistency with regional active transportation policies is included in **Table 4.4-6** on Page 4.4-13. For example, Goal No. 6 from the 2012-2035 RTP/SCS is stated as Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized) transportation, such as bicycling and walking. The analysis in the table states that one of the objectives of the Access for All Angelenos would ensure that a greater percentage of residents would be able to walk to meet their daily needs. The BEN streets would work in conjunction with existing paths and lanes to provide a low-stress network of bikeways for all types of riders. While many bicycle facilities would be implemented as envisioned by the Bicycle Plan, streets on the BEN would receive treatments beyond a regular bicycle lane or shared lane marking, such as buffered lanes, cycle tracks, and intersection enhancements, and would prioritize improvements for bicyclists relative to improvements for other roadway users.

The transportation analysis and associated GHG emissions analysis accounted for some active transportation in the mode split used for the regional VMT analysis. **Table 4.1-24** of the RDEIR in **Section 4.1 Transportation, Parking, and Safety** summarizes changes in peak period mode split among the Existing, Future No Project, and Future With Project scenarios by APC and for the City as a whole, and **Table 4.1-25** summarizes the peak period person trips by mode.

Under Existing conditions, auto is the dominant mode of transportation across the City, ranging from 78.9 percent to 84.2 percent of all peak period person trips, averaging 81.7 percent citywide. The Central APC has the lowest share of auto trips and highest share of transit, bike, and walk trips, while the North

Valley APC has the highest auto mode share and lowest bike and walk mode shares; the Harbor APC has the lowest transit mode share.

Under Future No Project conditions, the average auto mode share declines slightly from 81.7 percent to 80.4 percent citywide. The Central APC continues to have the lowest auto mode share and the highest share of transit, bike, and walk modes. Shifts in the North Valley APC from driving to walking, biking, and transit leave the Harbor APC in the position of having the highest auto mode share of 83.0 percent.

Future With Project conditions reduce the average auto mode share more than six percent from Existing conditions and more than five percent from Future No Project conditions, to 75.3 percent citywide. The largest absolute increases in the share of other modes accrue to walking, followed by transit and biking. On a relative basis, biking increases the most, more than 145 percent over Existing conditions, followed by transit (45 percent) and walking (26 percent).

Comment 201-7

As discussed above, the draft Mobility Element eviscerates the City's commitment to bike infrastructure. The EIR contains no analysis of the environmental impacts of that radical change in bike policy. The EIR's baseline levels of bicycling are substantial below those reported by the US Census Bureau, SCAG, the National Household Travel Survey, or any other published source of which we aware. It contains no source for these low estimates. Moreover, the EIR appears to anticipate a much slower rate of growth bicycling than the City has actually experienced in recent years. In any case, the EIR and the Mobility Element use inconsistent data for both existing levels of bicycling and rates of growth. Because it makes unwarranted conservative assumptions about existing and future levels of bicycling, and is inconsistent with the Mobility Element, the EIR by definition fails to analyze the impacts of the Mobility Element on the Bike Plan.

Response 201-7

The commenter's concerns/opinions regarding the Draft MP 2035 bicycle data will be forwarded to the decision-maker for consideration in taking action on the project. As discussed in Chapter 3, Project Description, the RDEIR incorporates the Bicycle Lane Network, which represents a 775-mile system of bicycle lanes that includes the 719 miles of lanes referred to as the Backbone Network in the 2010 Bicycle Plan as well as additional lanes that were either installed between 2011 and 2015 or identified as needed. CEQA requires an analysis of the proposed project on the environment, not on the Bike Plan, as the commenter asserts. See response 201-3 for the EIR analysis and conclusion of mode split and source of bicycle data. See **Master Response 1** regarding the vehicle-centric nature of the analysis and conservative estimate of bicycle mode share and **Master Response 12** regarding the incorporation of additional bicycle infrastructure into the proposed project for the RDEIR.

LETTER NO. 202

Jan Reichmann
Comstock Hills Homeowners Organization
1429 Comstock Ave.
Los Angeles, CA 90024

Comment 202-1

1. *Vehicles stuck in traffic create pollution.*

Response 202-1

See **Master Response 4** for the EIR analysis and conclusion of potential air quality effects from the proposed project.

Comment 202-2

2. *Removing parking in commercial areas kills business and jobs.*

Response 202-2

See **Master Response 3** for the EIR analysis and conclusion of loss of parking and **Master Response 22** for the explanation on why the scope/level of analysis in the EIR is appropriate.

LETTER NO. 203

James O’Sullivan
Fix the City Inc.
907 Masselin Ave.
Los Angeles, CA 90036

Comment 203-1

There is a fundamental flaw in linking land use to merely transportation capacity. The Framework policy 3.3.2 which was described as follows by the City: “The policy requires that type, amount, and location of development be correlated with the provision of adequate supporting infrastructure and services.” The Framework EIR further stated that policy 3.3.2 was important: “so that allowable increases in density ... would not occur until infrastructure and its funding was available.” As a result of the above, the mobility element is inconsistent with the Framework Element. This also includes water supply, storm drain capacity and treatment for runoff, electricity, emergency service (including response time), etc.

Response 203-1

See **Master Response 7** for the EIR analysis and conclusion of the relationship between the MP 2035 and the Framework Element and the EIR analysis of land use impacts related to General Plan consistency. See also **Master Response 16** that provides information for the EIR analysis and conclusion on the City’s Circulation Element. See **Master Response 5** for the EIR analysis and conclusion on the potential for growth-inducing effects. See **Master Response 14** that provides information for the EIR analysis and conclusion on Emergency Response times. The EIR determined that a potentially significant and unavoidable impact would occur to emergency access and response times.

The intent of the MP 2035 is to accommodate the forecast population of the City of Los Angeles. As this growth has already been identified and evaluated, capacity constraints are not relevant and were not identified in the EIR.

Comment 203-2

Land Use Element: Half of all community plans include reliance on 3.3.2. The Hollywood Community Plan was just rejected due, in large part, to inconsistency with other General Plan elements. The EIR does not integrate the requirements of the Framework Element as is therefore flawed.

Response 203-2

See **Master Response 7** for the EIR analysis and conclusion of the relationship between the MP 2035 and the Framework Element and the EIR.

Comment 203-3

To analyze the impact of making changes which favor bicycles which represent perhaps 1% of existing trips. Should people fail to embrace biking, thus inconveniencing 99% of all others, pollution, noise and traffic are likely to increase. The plan fails to perform an urban decay analysis to analyze and mitigate cut-through neighborhood traffic, congestion due to searching for parking, and the impacts of removing on-street parking for local The EIR fails businesses.

Response 203-3

The 2008 Complete Streets Act is a legal requirement which mandates that the circulation element of the General Plan be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan. See **Master Response 1**

regarding the traffic impact analysis methodology. See also **Master Response 18** for the EIR analysis and conclusion regarding diversion of vehicles due to travel lane conversions and potential for cut-through traffic. See **Master Response 3** for the EIR analysis and conclusion regarding loss of parking and impact on businesses (e.g., urban decay). See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

The EIR provides a detailed analysis, at a programmatic level, of the potential impacts on air pollution (**Section 4.3 Air Quality**), noise (**Section 4.5 Noise and Vibration**) and traffic (**Section 4.1 Transportation, Parking and Safety**). The EIR concluded that the project will have significant and unavoidable impacts to traffic and noise and less than significant impacts to Air Quality. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-4

The safety analysis neglects to mention that a large number of safety related issues stem from crumbling infrastructure such as potholed streets, deteriorated sidewalks and dangerous curbs and gutters. A Any reliance on existing infrastructure is flawed.

Response 203-4

Chapter 2 (World Class Infrastructure) of the MP 2035 includes an objective to increase the miles of roadways, paths, and sidewalks that are repaired every five years and to strengthen and upgrade City-owned bridges by 2035 (see also **Response 102-2**). Further evaluation of the specific infrastructure at a particular location will be evaluated when site-specific project details are known.

The commenter's concerns/opinions regarding safety issues originating from aging infrastructure will be forwarded to the decision-maker for consideration in taking action on the project. Finally, the commenter provides no substantial evidence supporting different analysis or conclusions from those in the EIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-5

The railroad crossings section is directly incompatible with the findings and implementation of the Expo line, especially at Overland, Westwood.

Response 203-5

The commenter's concerns/opinions regarding railroad crossings will be forwarded to the decision-maker for consideration in taking action on the project. Any proposed mobility improvements at railroad crossings would be within the jurisdiction of and subject to approval by the California Public Utilities Commission, which has established a robust set of regulations for ensuring safety at railroad crossings. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. The commenter provides no specific comment on the environmental conclusions of the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-6

The EIR fails to address the harm to local businesses from the loss of parking which will cause customers to either abandon those businesses or take longer to locate a parking space. Loss of local businesses can create blighted areas and/or lead to increased density through redevelopment.

Response 203-6

See **Master Response 3** for the EIR analysis and conclusion of loss of parking. Additionally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-7

The EIR fails to address pathways to transit. As an example, CD5 transportation deputy Jay Greenstein recently stated that Expo impacts to Cheviot (and on Motor) were not studied. Further, the Expo EIR failed to address any impacts resulting from those seeking light rail access from Century City or Beverly Hills. Prior to approving this EIR, the City must analyze pathways between population centers and transit hubs. The new analysis should be included and the EIR recirculated.

Response 203-7

See Response 200-1. The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).) Policy 3.3, Land Use Access and Mix relates to access to jobs, destinations, and other neighborhood services and explains that first/last mile connections to provide access to transit stations are a critical component of TOD corridors and the transportation system. Pedestrian access to transit is also part of the Pedestrian Enhanced Districts (PEDs). As stated in Chapter 3, Project Description, PEDs would be located near schools, transit stations, areas of high pedestrian activity, areas with high collision frequency, or other placemaking opportunities. Additional pedestrian safety and enhancements, such as increasing sidewalk widths and improved pedestrian crossing and safety treatments would also be considered as appropriate. Pedestrian needs are closely linked to the TEN because of the conditions encountered walking to or from transit services as well as waiting at stops and stations.

Comment 203-8

Plans for bicycle security are not based on reasonable assumptions as the LAPD does not have the resources to police bicycle storage/rack areas.

Response 203-8

The MP 2035 establishes policy 3.8 Bicycle Parking that seeks to “provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.” Please see the staff report for a more extensive discussion on this issue. The commenter’s concerns/opinions regarding security around bicycle infrastructure will be forwarded to the decision-maker for consideration in taking action on the project. The commenter provides no specific comment on the environmental conclusions of the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-9

Requirements for bicycle parking do not correspond with bicycle usage (1%), and impose an unreasonable cost to developers, making the cost of housing more expensive. Any plan to replace vehicle parking requirements with bicycle parking requirements is inherently flawed as no analysis was performed to validate such replacements/reductions.

Response 203-9

The project does not propose to replace vehicle parking with bicycle parking. The Bicycle Parking Ordinance was adopted in 2013 and is not amended with the adoption of the MP 2035. The commenter’s

concerns/opinions regarding bicycle infrastructure will be forwarded to the decision-maker for consideration in taking action on the project.

Comment 203-10

Creation of parking districts, using meter district funds from the Special Revenue Parking Fund to construct public free short-term parking is required prior to removing on-street parking for bicycles or any other purpose.

Response 203-10

There is not a requirement in which the removal of on-street parking for bicycles or any other purpose requires the creation of a parking district to construct public free short-term parking. The commenter's concerns/opinions regarding parking districts will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 3** for the EIR analysis and conclusion of parking. Additionally, the commenter provides no specific comment on the environmental conclusions of the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-11

The plan is flawed as it does not consider the increased demand on rescue services which result from increased bike ridership. LAFD reports increased rescue/EMT calls when bike ridership increases. Reducing bike/vehicle accidents depends on separating bikes and vehicles, which in turn depends on massive infrastructure expenditures which are not feasible. An increase in biking without adequate infrastructure will cause a significant impact on first responders.

Response 203-11

The conversion of travel lanes into cycling infrastructure consisting of marked lanes, tracks, shoulders and paths designed for use by cyclists and from which motorized traffic is generally excluded is anticipated to result in an increase in bicycle trips as a percentage of total trips. The addition of cycling infrastructure would not create more users of the transportation system, rather, it would shift users from motorized vehicles to bicycles. (The term cycling infrastructure includes bike lanes, cycle tracks, separated bike lanes, road shoulders and side paths located within a road right-of-way.) The increase in the number of cyclists would not result in a direct correlation to an increased demand for emergency services.

The degree of safety provided by the use of cycling infrastructure is based on the intensity of implementation. Generally, every added bicycle to the road would result in one fewer car on the road. An increased mode shift to bicycles would make bicyclists a more visible and more prevalent part of the existing transportation environment, which would in turn reduce the risk of injury from bicycle/motor vehicle conflict. For these reasons, the increase in demand for emergency services from a mode shift from vehicles to bicycles is not anticipated to be substantial. See also **Master Response 13** for the EIR analysis and conclusion regarding bicycle safety.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-12

The plan is flawed as it relies on alleys for loading when a large percentage of alleys in the city are so deteriorated as to be non-functional. Any reliance on alleys as loading areas is flawed.

Response 203-12

The MP 2035 does not limit loading to alley areas. Policy 1.7 of MP 2035 acknowledges the value of well and regularly maintained streets and alleys. Please see the staff report for a more extensive discussion on this

issue. The commenter's concerns/opinions regarding the use of alleys in the plan will be forwarded to the decision-maker for consideration in taking action on the project.

The commenter provides no specific comment on the environmental conclusions of the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-13

The parking section's conclusions are entirely arbitrary and capricious. Businesses thrive based on parking being available. The City requires certain levels of parking (30%) for the construction of virtually every land use. Any plan which reduces parking fails to evaluate the large percentage of traffic trips associated with those searching for parking.

Response 203-13

See **Master Response 3** for the EIR analysis and conclusion regarding the impact of loss of parking on businesses. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-14

The traffic section fails to analyze the congestion costs to the local economy due to LOS below C.

Response 203-14

See **Master Response 2** for the EIR analysis and conclusion on how the conversion of vehicular travel lanes to bicycle facilities could positively affect community character and quality of life. See **Master Response 15** for the EIR analysis and conclusion on legislative changes and transportation performance metrics. CEQA does not require that socioeconomic effects be addressed unless the socio-economic effect could lead to direct physical impacts. The CEQA analysis focuses on the physical environmental impacts of a project and not socioeconomic or monetary impacts. In making a decision as to whether to approve a project, decision-makers weigh a number of factors including the physical environmental impacts and other issues including socio-economic factors.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-15

The air pollution section fails to recognize the health impacts on those exerting themselves in areas that are choked by pollution. The EIR fails to take into account new pollution indices released by the California EPA. The EIR should be recirculated once an analysis of that data is included.

Response 203-15

See **Master Response 4** for the EIR analysis and conclusion of potential air quality effects from the project.

There is an inherent trade-off in urban active transportation. As indicated in EIR **Section 4.3 Air Quality**, the South Coast Air Basin is a State nonattainment area for ozone, PM₁₀, and PM_{2.5}. However, it is universally accepted that bicycle riding is a beneficial mode of exercise. Data is not currently available regarding the trade off in health effects of bicycling in urban areas. The SCAQMD manages an Air Quality Appendix that alerts the public when pollutant concentrations reach unhealthy levels. It is the responsibility of individuals to monitor the Air Quality Index and decide if pollution levels are healthy for bicycle riding.

The majority of buses operating within the City of Los Angeles are powered by alternative fuels. For example, the entire bus fleet operated by the Los Angeles County Metropolitan Transportation Authority is powered by compressed natural gas. Therefore, it is not anticipated that increased bus service would substantially increase diesel particulate emissions. In addition, the proposed VEN is designed to improve the flow of passenger vehicles along heavily trafficked roadways. It is not anticipated that lane conversions would change diesel-emitting truck travel patterns and significantly increase associated exposure to emissions. Therefore, the proposed project would result in a less-than-significant impact related to operational TACs.

The reference to the California EPA pollution indices is unclear and no further response is possible. The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-16

The EIR fails to study the economic impacts of tax increases or other fee increases that will be required to support the plan.

Response 203-16

See **Master Response 9** for the EIR analysis and conclusion on funding and implementation of the MP 2035. CEQA does not require that socioeconomic effects be addressed unless the socio-economic effect could lead to direct physical impacts. The CEQA analysis focuses on the physical environmental impacts of a project and not socioeconomic or monetary impacts. In making a decision as to whether to approve a project, decision-makers weigh a number of factors including the physical environmental impacts and other issues including socio-economic factors.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-17

The EIR fails to address the growth-inducing impacts of transit-based density enhancements that will be allowed once portions of the plan, but not all of its mitigations, are implemented.

Response 203-17

See **Master Response 5** for the EIR analysis and conclusion regarding the potential growth inducing effects of the MP 2035. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-18

The plan fails to address the simple truth that locating people near transportation hubs also necessarily involves locating them in high pollution areas. The measurement of a 500 foot setback is insufficient as many studies have shown pollutants distributed miles from pollution sources such as freeways. The County of Los Angeles does not fund housing projects that are within 1000 feet for this reason. Further, a setback should not merely apply to structures, but any use, including recreational use, in high risk areas.

Response 203-18

See **Response to Comment 203-17** above, the project would not induce growth, rather it would accommodate growth. State (AB 32, SB 375) and regional (2012-235 RTP/SCS) policy mandate the location of new uses adjacent to transportation infrastructure. While CARB has indicated that a setback of 500 feet

from freeways and high-volume roadways is advisable, such setbacks are not always feasible in urban areas. As appropriate, project specific mitigation (such as air filtration) is imposed at the project level. The proposed project is not a land use plan and, as such, would not locate sensitive land uses near high pollution sources, such as freeways. See **Master Response 4** that discusses potential Air Quality impacts from the project. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-19

The EIR references air filtration to reduce exposure to pollutants. This logic is flawed on several grounds. First, filters do not remove harmful gases such as NOx, SOx and VOCs. Second, filters are only useful when they are regularly maintained. Absent a strict maintenance requirement/program, filtration should not be considered as mitigation. Third, filtration only (partially) addresses indoor air. Allowing land uses near roadways and other pollution generators exposes people to pollutants in recreational areas and in other outdoor areas. Further, absent positive interior air pressure, pollutants will enter the building through open doors and windows.

There is no mention of requiring high-level filtration in parking areas.

Response 203-19

See **Master Response 4** that discusses potential Air Quality impacts from the project. The proposed transportation improvements evaluated in the MP 2035 would result in a less-than-significant impact to air quality. Therefore no mitigation measures are required. Air filtration is identified in the MP 2035 as an example of a potential measure to reduce exposure to pollutants and is not a mitigation commitment identified in the EIR to reduce significant impacts. The proposed project would not include parking areas, and high-level filtration in parking areas is not applicable to the MP 2035. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-20

Reporting references such as the transportation investment report on page 123 have no value unless they are designated explicitly as mandatory. The City has already claimed that the Annual Report on Growth and Infrastructure is discretionary. Therefore, unless an explicit, clear and binding obligation to produce reporting is provided, reporting should not be considered as mitigation or satisfying CEQA reporting requirements.

Response 203-20

As discussed in **Master Response 7**, the MP 2035 is consistent with the General Plan and the Framework Element. The RDEIR did not identify impacts requiring reporting as mitigation. Additionally, the RDEIR is a standalone EIR and is not required to implement mitigation from a separate EIR. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR, including the need for additional mitigation measures. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-21

The entire plan is flawed as it would implement land use and other changes without the prerequisite of infrastructure improvements to key infrastructure elements such as streets, sidewalks, police, and fire. For the plan to be valid, it must sequence and synchronize land use policy changes and other changes with adequacy of supporting infrastructure as required by the General Plan Framework. This would require development performance standards, e.g., mitigate traffic to bring LOS to C and achieving proper first-responder response times.

Response 203-21

The MP 2035 does not propose or implement land use changes. This EIR anticipates the same land use changes with or without the implementation of the MP 2035 and evaluates future conditions both with and without the proposed project. The commenter's concerns/opinions regarding the Framework will be forwarded to the decision-maker for consideration in taking action on the project. See Response 203-1 and **Master Response 7**. See **Master Response 15** for the EIR analysis and conclusion on legislative changes and transportation performance metrics. See **Master Response 14** for the EIR analysis and conclusion of Emergency Vehicle Access and Response Times. The EIR determined that a potentially significant and unavoidable impact would occur to emergency access and response times.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-22

The new funding options include tax increases which are unlikely to pass, and if they do pass would cause severe economic damage to the city with unpredictable results.

Response 203-22

CEQA does not require that socioeconomic effects be addressed unless the socio-economic effect could lead to direct physical impacts. The CEQA analysis focuses on the physical environmental impacts of a project and not socioeconomic or monetary impacts. In making a decision as to whether to approve a project, decision-makers weigh a number of factors including the physical environmental impacts and other issues including socio-economic factors.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-23

The best way to improve air quality is to implement programs at the port, including addressing Ocean Going Vessel boilers. If 80% of SOx is estimated to come from the port by 2020, then the port should be the focus of air quality efforts.

Response 203-23

The comment does not apply to the proposed project. The proposed project does not affect ship emissions or locate sensitive land uses near port facilities. Air quality emissions associated with ocean going vessels are addressed in the Port of Los Angeles Clean Air Action Plan. The commenter provides no specific comment on the environmental conclusions of the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-24

The plan fails to address pollution generated from locomotives in maintenance yards.

Response 203-24

The comment does not apply to the proposed project. The proposed project does not affect locomotive emissions in maintenance yards or locate sensitive land uses near rail facilities. In addition, the City does not have the jurisdiction to regulate emissions from locomotives. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for

different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-25

The EIR calls for demand pricing on meters without evaluating the impacts on local business or local neighborhoods which might see increased parking intrusion, and the plight of local businesses adjacent to residential permit parking districts.

Response 203-25

See **Master Response 3** for the EIR analysis and conclusion of parking and impact to local businesses. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-26

The EIR fails to take into account the ruling in Fix The City v. City of Los Angeles, Case# BS138580.

Response 203-26

See **Master Response 7** for a discussion of the relationship of this project to the cited case.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-27

The EIR fails to address increased cut-through traffic which would be created by reducing vehicle capacity on the bike enhanced network. (see above)

Response 203-27

See **Master Response 18** for a discussion of the EIR's analysis and conclusions re cut-through traffic.

Comment 203-28

The EIR contains improper mitigations as those mitigations inherently rely on an approval of tax increases or in fees by the voters. This includes changes to parking districts.

Response 203-28

See **Master Response 9** for the EIR analysis and conclusion on funding and implementation of the MP 2035. The mitigation measures do not rely on approval of tax increases. The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-29

The General Plan contains the following section under "Annual Review." While the courts ruled that the production of the Report was discretionary, there was no finding that relieves the City from relying on the Report for those citywide element sections it chooses to, per its discretion, update.

"The Department of City Planning shall annually review the need to comprehensively update the citywide elements, including the Framework Element and the community plans. The results of this annual review shall be

reported to the City Planning Commission, the City Council, and the Mayor through the Annual Report on Growth and Infrastructure. This report shall recommend which citywide element or community plan should be updated and why. These recommendations shall be based on an evaluation of changing circumstances, and other information provided by the Monitoring System.”

Response 203-29

See **Master Response 7** for a discussion of the relationship between MP 2035 and the General Plan, including the Framework Element.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-30

The City confirmed its reliance on Framework Policy 3.3.2 in Case#BS042964 as shown below. The Mobility Element EIR is inconsistent with the Framework Element as accurately described by the City to the courts. Policy 3.3.2 was also cited as mitigation for numerous impacts including Police and Fire. The Housing Element also relies on Policy 3.3.2.

“What became clear was that a crucial feature of dealing with growth impacts was contained in the GPF, its program for timing allowable development with available infrastructure and frequent updating of its data along with a formal monitoring program. For this reason, the City concluded that the GPF was the environmentally desirable alternative, because it has the best combination of land use policies tied to mitigation measures tied to annual reporting and selective amendments of community plans only when consistent with the GPF policies. (1 AR 77-78 [FINDINGS ADOPTED BY City Council explaining why GPF was environment tally superior alternative])

Response 203-30

See **Response to Comment 203-1**. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 203-31

Our streets, sidewalks and bridges are not sufficient (Public Safety Issue) for this update. The 2010/2011 Infrastructure Report Card lists unsecured funds as follows. (2003 and 2010/2011 Infrastructures included in Exhibit A)

A) Bridges \$.300 Billion unsecured

B) Streets \$2.295 Billion Unsecured

C) Street Lights \$.262 Billion Unsecured

D) Sidewalks \$1.500 Billion (estimate unsecured. Could be as much as \$2.5 Billion This does not include curbs, aprons and gutters.

E) Total needed \$4.357 Billion needed for Public Safety, especially for pedestrians and Bicyclists.

Response 203-31

The commenter’s concerns/opinions regarding the condition of existing streets, sidewalks, and other infrastructure will be forwarded to the decision-maker for consideration in taking action on the project. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 204

Mary Silverstein
Harbor Community Benefit Foundation

Comment 204-1

While the draft comprehensively details air pollution mitigation in the Harbor communities and at the Port of Los Angeles as related to mobility, we recommend the draft move beyond air pollution indicators and consider other industrial and goods movement impacts, such as incompatible land uses, reduced community resource access, and decreased pedestrian safety, that create mobility challenges in communities with disproportionately high industrial uses, and devise policies that address goods movement impacts at the source level. We also recommend updating the San Pedro and Harbor City-Wilmington Community Plans to reflect the proposed city-wide mobility policies.

Response 204-1

See **Master Response 8** for the EIR analysis and conclusion on Goods Movement with the implementation of the MP 2035. The commenter's opinions regarding the MP 2035 and other Community Plans will be forwarded to the decision-maker for consideration in taking action on the MP 2035. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 204-2

1. Safety. Port and Port-related operations create a series of safety challenges in the communities of San Pedro and Wilmington. When considering safe speeds (1.6 Design Safe Speeds), the document should consider adopting safe speeds specific to trucks entering and leaving Port and Port-related facilities in and around the community. While it is important to create safe conditions for goods movement (1.10 Goods Movement Safety), it is just as important to consider how unsafe truck routes create unsafe environments for pedestrians, cyclists, and residents. Such conditions discourage walking or using certain thoroughfares.

When considering road detours during construction (1.8 Multi-Modal Detour Facilities), the document should also consider emergency and natural disaster preparedness. For example, in San Pedro and Wilmington, which are bookended by industrial uses and a waterfront, it is important to provide a strategy for residents to safely and efficiently leave their homes in the event of an emergency or natural disaster. Also, just as the policies call for separating equestrian trails from bicycling trails (1.11 Recreational Trail Separation), there should be consideration of trail separation for the purpose of creating a safe buffer between cyclists and pedestrians and Port and Port-related traffic.

From a safety standpoint, we recommend exploring designated goods movement truck routes, and more importantly, discouraging or preventing trucks from using neighborhood streets to complete routes. This includes establishing a system by which residents could contact public agencies to report misuse of routes in their neighborhoods.

Response 204-2

See **Master Response 13** for the EIR analysis and conclusion on safety with the implementation of the MP 2035. See **Master Response 8** for the EIR analysis and conclusion on Goods Movement with the implementation of the MP 2035. The commenter's opinions regarding the MP 2035 and other Community Plans will be forwarded to the decision-maker for consideration in taking action on the MP 2035. MP 2035 provides a city-wide policy and planning document. As detailed planning occurs in connection with community plans and the Port of Los Angeles, detailed recommendations will be developed and analyzed specific to communities and goods movement.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 204-2

3. Data & Communications. While it certainly is important to raise awareness about the role of goods movement in the Los Angeles economy (4.7 Goods Movement), this policy should also consider explaining or addressing the environmental, community, and health impacts associated with such goods movement, especially at the source level, in neighborhoods like Wilmington and San Pedro.

Response 204-3

The MP 2035 includes policies 5.1 Sustainable Transportation and 5.4 Clean Fuels and Vehicles that are intended to encourage the development of a sustainable transportation system and encourage the adoption of alternative fuels. The commenter's opinions regarding MP 2035 will be forwarded to the decision-maker for consideration in taking action on the MP 2035. See **Master Response 8** for the EIR analysis and conclusion on Goods Movement with the implementation of the MP 2035 and Response 212-1 for more information about the Port of Los Angeles' Clean Air Action Plan.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 205

Gerald A. Silver
Homeowners of Encino

Comment 205-1

3. Inadequate Outreach. The Planning Dept. received a total of only 33 responses to its Notice of Preparation (NOP). This clearly indicates that its outreach efforts were grossly inadequate relative to the scope and impact of the proposed transportation changes. This inadequate outreach effort led to faulty recommendations that are not be accepted to the public. The Planning Department should not accept its proposed goals since millions of impacted Los Angeles residents have not [been] consulted. The Planning Dept. must ask the right questions of stakeholders before drawing any conclusions that will impact traffic or transportation:

Response 205-1

Refer to **Master Response 6** for the EIR analysis and conclusion regarding public outreach.

Comment 205-2

6. The proposed Mobility Plan fails to achieve its most important objectives -- to improve traffic flow, especially in Studio City, Sherman Oaks, Encino and Woodland Hills and the South Valley:

According to Draft, page 4-1-27, peak AM traffic operating conditions in the South Valley will get worse with the proposed project. Levels of Service (LOS) D or better will drop from 95.1% to 90.7%. It will not get better for drivers, proving to be a failure of the Mobility plan to achieve its objectives

According to Draft, page 4-1-28, peak PM traffic operating conditions in the South Valley will get worse with the proposed project. Levels of Service (LOS) D or better will drop from 92.2% to 87.2%. It will not get better for drivers, proving to be a failure of the Mobility plan to achieve its objectives.

According to Draft, page 4-1-27, peak AM traffic operating conditions in the South Valley will get worse with the proposed project. Levels of Service (LOS) F (grid-lock) will grow from 4.9% to 9.3%. AM grid-lock will not get better for drivers, proving to be a failure of the Mobility plan to achieve its objectives.

According to Draft, page 4-1-28, peak PM traffic operating conditions in the South Valley will get worse with the proposed project. Levels of Service (LOS) F (grid-lock) will grow from 7.8% to 12.8%. PM gridlock will not get better for drivers, proving to be a failure of the Mobility plan to achieve its objectives.

Response 205-2

The commenter's concerns/opinions regarding the MP 2035 will be forwarded to the decision-maker for consideration in taking action on the project. The RDEIR updated the roadway level of service analysis to reflect the changes to the MP 2035 Enhanced Networks (Tables 4.1-19 and 4.1-20 in the RDEIR contain the updated analysis results). As stated in the RDEIR, impacts related to congestion were determined to be significant and unavoidable. See **Master Response 15** for the EIR analysis and conclusion on legislative changes and transportation performance metrics. The most important objective of the MP 2035 is not to improve traffic flow, as the commenter asserts. The MP 2035 addresses all modes of circulation on the City's street network, guiding mobility policies, programs, and projects in the City of Los Angeles through 2035. The five goals of the MP 2035 are Safety First, World Class Infrastructure, Access for all Angelenos, Collaboration, and a Clean Environment and Healthy Communities.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 205-3

The Mobility Plan will have huge negative consequences for residents, schools, car-pooling, shopping and the business community.

Response 205-3

The MP 2035 is intended to facilitate circulation throughout the region and encourage multi-modal travel. Environmental impacts of the project are discussed in the EIR.

See also **Master Responses 2** and **3** for the EIR analysis and conclusion concerning impacts to quality of life and loss of on-street parking respectively.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 205-4

Comment: Los Angeles streets should be designed as functional tools for passenger vehicles, buses and movement of goods, not recast as “enjoyable places for all ages and all modes of travel.” Encouraging more bicycles on City streets is grossly unsafe for bicyclists. The Mobility Plan should not encourage “all modes of travel” on City streets, including skateboards, bicycles, roller-blades, etc.

We agree that with the need to decrease pedestrian and bicycle collisions with vehicles by 2020 – this is best achieved by reducing bicycle usage, not increasing it. We agree with the need to increase the number of adults and children who receive safety education and to increase the number of street segments operating at target speeds annually.

Response 205-4

The commenter’s concerns/opinions regarding the long-term vision for Los Angeles streets will be forwarded to the decision-maker for consideration in taking action on the project. A transportation system that seeks to reduce pedestrians and bicyclists is a vision that is inconsistent with the and legislative mandate brought forth by the 2008 Complete Streets Act and the City established goals and objectives in **Chapter 3.0 Project Description** of establishing a multi-modal system with access to all users. See **Master Response 13** for the EIR analysis and conclusion regarding bicycle safety.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 205-5

We believe that the proposed project will have significant impacts on the environment that have not been fully addressed in the draft EIR. The Mobility will have a significant impact on transportation, air quality, noise, energy, and population growth.

Response 205-5

The EIR evaluates all potential environmental impacts from the proposed project in compliance with CEQA. The EIR analyzed transportation in **Section 4.1**, air quality in **Section 4.2**, noise in **Section 4.5**, population growth in **Section 6.3**, and energy at **Section 6.2**. The impacts to transportation and air quality are further discussed in **Master Responses 1** and **4**. The EIR concluded there would be significant an unavoidable impacts to transportation and noise and less than significant impacts related to air quality, energy and population growth.

As to impacts to energy, although the multi-modal improvements would increase vehicle delay in some areas of the City, the proposed project would result in lower VMT and less fuel consumption. Therefore, the proposed project would not result in a significant increase in the use of fossil fuels (**Section 6.2**) Impacts were determined to be less than significant. As to population impacts, the transportation improvements proposed represent the necessary transportation infrastructure to facilitate mobility throughout the City and comply with the Complete Streets Act. The project is designed to address existing and forecast growth; it would not induce growth in the city of Los Angeles (see EIR **Section 6.3**). Impacts were determined to be less than significant. See **Master Response 5** for the EIR analysis and conclusion regarding potential growth-inducing effects.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 205-6

The Lead Agency must take into consideration the effects of this and other projects which, will have individually limited, but cumulatively considerable impact on the environment. With the effects of past, current and probably future projects mandatory findings of significance should be found.

Response 205-6

Chapter 6.0 Other CEQA Considerations of the EIR presents a discussion of the cumulative effects of the proposed project, which takes into account the past, current, and future related projects. Since MP 2035 is a planning document with a horizon planning year of 2035, the analysis represents the cumulative scenario of planned future projects in combination with the proposed project (see **Appendix C** for future growth/development assumptions). The potential for the MP 2035 to result in a cumulatively considerable contribution to impacts in the City is addressed in detail in each section of the EIR. Cumulative impacts are addressed in **Section 6.1 Cumulative Impacts** of the EIR. The MP 2035 would result in significant adverse impacts after mitigation to traffic congestion, emergency access, and operational noise associated with bus traffic. These impacts would be cumulatively considerable when combined with impacts from City projections regarding growth, land use and growth. “The MP 2035 would result in significant adverse impacts after mitigation to traffic congestion, emergency access and response times, and noise associated with bus traffic, these impacts would combine with impacts of other projects in the City.”

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 205-7

Mitigations that are required by law or official regulations cannot serve as mitigations to satisfy the requirements of the California 6 Environmental Quality Act (CEQA). Nor can mitigations be acceptable that are considered to be standard operating practices.

In preparing your final EIR, you must recognize that any mitigation that you propose must go beyond those mandated by law or existing policy and practice. Compliance with the law and standard operating procedures establishes the baseline. CEQA mitigations are discretionary actions taken beyond the baseline. You must include verifiable mitigations in the final EIR, not merely a recital of legal requirements or standard operating practices. We ask that you revise your findings and address the following environmental concerns which we believe have been overlooked or inadequately dealt with in your draft EIR.

Response 205-7

The EIR identifies six mitigation measures for transportation (**Section 4.1 Transportation, Parking and Safety, T1 through T6**), one mitigation measure for land use (**Section 4.2 Land Use and Planning, LU1**), two mitigation measures for noise and vibration (**Section 4.5 Noise and Vibration, N1 and N2**) and three mitigation measures for biological resources (**Section 4.6 Biological Resources, BR1 through BR3**). These mitigation measures are not currently required by law and go beyond the established legal requirements to reduce potential environmental effects. The City of Los Angeles acknowledges that regulations and mandatory requirements are assumed as part of the baseline conditions. However, regulations and laws are frequently included in lists of mitigation measures because they are effective at reducing potential environmental effects and inclusion of such requirements serves to highlight them and inform the public. Standard operating practices may not be required by law and if they are necessary to reduce impacts below a level of significance then they are appropriately identified as mitigation measures.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 205-8

Transportation and traffic circulation will be negatively impacted by the proposed project. There are a number of E and F level intersections in the vicinity of the project. The implementation of this project will impede traffic and circulation and make gridlock worse. The final EIR should explain how the E and F level, gridlocked intersections in the area will be mitigated to insignificance.

Because of the project's magnitude it will generate significant traffic congestion problems. Traffic congestion resulting from the modifications of roadways, lane closures, detours, bicycle and bus lanes, and the installation of parklets and slower moving vehicles mean that commute times will increase significantly.

Since the project has corridor level transportation impacts, the EIR should delineate the long term impacts, the impact on freeways and traffic on City streets. It must provide a detailed account on how generation rates, trip distributions, time of day analysis, effects on A.M. and P.M. traffic conditions, etc. were derived.

Response 205-8

See **Master Response 1** for a discussion of the EIR traffic analysis methodology related to impacts from the project on LOS, traffic congestion, travel times, identified significant and unavoidable impacts related to traffic, and the data, and models the EIR used and relied on. See also **Master Response 15** for the EIR analysis and conclusion on legislative changes and transportation performance metrics.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 205-9

The final EIR must comprehensively address the phasing issue. It must clearly report on the incremental impacts on traffic and how will the negative impacts of parklets, bicycle lanes and reserved bus lanes, and traffic calming will be mitigated to insignificance.

Response 205-9

See **Master Response 1** for the EIR analysis, including the assumptions and methodology used to address impacts on traffic, including the level of analysis and review related to implementation of the MP 2025. The EIR is a programmatic-level document. The project description does not include detail on the phasing or

specific timing of individual projects. As individual projects are considered, project-level impacts will be evaluated at that time under a separate undertaking. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 205-10

The draft EIR fails to adequately address the No Project Alternative (Section 5.0 Alternatives and Table 5.1, page 5.9.) An adequate and Alternatives analysis is a core element of each EIR. An EIR must contain and analyze in depth "range of reasonable alternatives." The range must be sufficient "to permit a reasonable choice of alternatives so far as environmental aspects are concerned. This was not done. Table 5.1, page 5.9 claims that proposed set of project improvements is superior to the No Project Alternative which is not borne out by the analysis.

The EIR must always include analysis of the No Project Alternative which must discuss what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. We do not agree that "if the project improvements were not implemented transportation network conditions would remain in their current condition for a time but would deteriorate as cumulative development increases without multimodal improvements, mode shifts to pedestrian, bicycle, and transit it would not occur as rapidly, and streets could become increasingly congested – possibly more in the long term than would occur with implementation of the project." In reality, just the opposite is true.

Under Alternative 1, planned transit, bicycle and pedestrian improvements would occur which would not incrementally increase the multi-modal mobility in the study area. Therefore, impact would occur related due to the pedestrian, bicycle, and transit system. It is not true that no significant changes to lane configurations or removal of parking would occur under shifts to pedestrian, bicycle, and transit.

Response 205-10

See **Master Response 12** for the EIR analysis and conclusion of alternatives. The EIR addresses the No Project Alternative, providing an analysis of the outcomes for a variety of metrics under No Project conditions. The commenter does not explain why he believes conditions would improve under the No Project condition. Cumulative development would occur within the City of Los Angeles with or without implementation of the proposed project and cumulative impacts are discussed in **Section 6.1 Cumulative Impacts** of the RDEIR. .

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 205-11

In determining what constitutes a reasonable range of alternatives, there must be a set or group of such alternatives which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. Guidelines section 15126.6(a). These were not fully explored. The term feasible is defined in Public Resources Code section 21061 .1 as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors. The range of alternatives discussed does not foster informed decision making and public participation. The EIR must identify the alternatives considered in, and those

excluded from, EIR analysis and should provide the reasons for their rejection – the draft EIR fails to do this assessment adequately to meet the CEQA requirements.

Response 205-11

See **Master Response 12** for the EIR analysis and conclusion of project alternatives. The Draft EIR/RDEIR evaluates a range of alternatives in an attempt to avoid or substantially lessen the significant impacts of the project. See **Response 201-1** for a discussion of the feasibility of other alternatives. The RDEIR identified three additional alternatives to the proposed project (one of which – Alternative 3 – was similar to the old project analyzed in the previous Draft EIR); a total of five project alternatives are analyzed in the RDEIR.

LETTER NO. 206

South Carthay Neighborhood Association
Brad S. Kane, President

Comment 206-1

The Environmental Impact Report ("EIR") for the Initiative must make a detailed evaluation of the significant impact the Plan will have on South Carthay.

Response 206-1

Due to the size of the transportation network, the EIR for the MP 2035 evaluates the environmental impacts on an area planning commission level within the City. See **Master Response 22** regarding the justification for an APC level analysis. The South Carthay Neighborhood is within the Central Community Planning Area of the City of Los Angeles. La Cienega and Pico Boulevards, which generally represent the southern and western boundaries of the South Carthay neighborhood, are identified on the TEN and Pedestrian Enhanced Districts while Olympic Boulevard is identified on the VEN. Because the transportation improvements do not occur within the South Carthay community, and are located on the perimeter, potential effects that could potentially divide or disrupt the community are not anticipated, except for potentially diverted traffic.

Section 4.1 Transportation, Parking and Safety of the EIR identifies the potential transportation effects for the study areas. The potential impacts associated with implementation of the MP 2035 are evaluated using the City of Los Angeles' Travel Demand Model. Under Existing conditions in both the AM and PM peak periods, the Central Area Planning Commission has the highest share of segments operating at Level of Service E or F (worst two levels for measure of congestion). The MP 2035 proposed transportation improvements would result in more peak period vehicle miles traveled compared to existing conditions (8.2 percent) but less than the future without project conditions (-13.7 percent) within the Central Los Angeles Community Planning Area. The extent to which trips would divert to adjacent local roadways is not reasonably foreseeable given the broad framework of MP 2035 and the Enhanced Networks, and therefore, impacts cannot be precisely determined because of the lack of project site specific details not otherwise available at this time. However, it is anticipated that increased traffic could occur on these roadways and transportation impacts from cut-through traffic were identified as a significant and unavoidable impact in the EIR. See also **Master Response 18** for the EIR analysis and conclusion regarding cut-through traffic.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 206-2

The Mobility Plan seeks to impose severe parking restrictions in the Proposal by declaring Pico and Olympic part of a Vehicle Enhanced Network ("VEN") in which parking for small businesses will be reduced by 80% during traffic hours. The assertion that business customers can still park on the adjacent streets is not even remotely realistic. If a VEN is achieved, local businesses will be severely damaged because they rely primarily on street parking. The walkable neighborhood we currently enjoy will also be destroyed. Most of the adjacent blocks have apartment buildings with restricted parking, which is currently congested. After the VEN, Pico and Olympic will be a mere paint strip away from becoming a one (1) way streets.

Several things are not mentioned or are given as a contingency in order to reduce the negative impact for on-street parking. Such things as:

1) No identification of alternative modes of transportation being offered or explored

2) *No time frame of hours where daily parking will not be available. It can only be assumed that it would be the same as in the Olympic Pico I-way Pair proposal due to the tie-in to rush hour traffic.*

3) *No mitigation or mention of establishing parking structures to offset decreased daily parking.*

4) *No commitment to allow or pre approve future modes of transportation that may be shown to be cheaper, less expensive and faster to build, i.e. Personal Rapid Transit. Even along a specific corridor this would be less expensive than some currently offered alternatives.*

Response 206-2

The commenter's concerns/opinions regarding parking restrictions will be forwarded to the decision-maker for consideration in taking action on the project.

The EIR analyzes the Project Description as it is known at this time; future modes of transportation are not reasonably foreseeable in sufficient detail to analyze in the EIR at this time. Pico Boulevard is not included on the VEN. See **Master Response 3** for the EIR's analysis and conclusion regarding parking and its impact on businesses and related environmental impacts. Parking issues have not been identified as resulting in environmental impacts that require mitigation. See **Master Response 11** for the EIR analysis and conclusion on the development of the MP 2035, and **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. **Master Response 17** provides information for the EIR analysis and conclusion on the enhanced network treatments on Pico and Olympic Boulevards.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 206-3

Further, if the VEN is achieved, the EIR should analyze the impact on South Carthay resulting from:

1. *Cut-through traffic on north/south residential streets running from Olympic to Pico resulting from:*

- a. Entry and exit of vehicles from the Olympic and Pico "high capacity corridors;"*
- b. Vehicles needing to back-track on Olympic and Pico;*
- c. Back-up traffic from vehicles reaching the end of the "high capacity corridor";*

2. *Traffic impact on the north/south arterial streets of La Cienega Boulevard and Fairfax Avenue which are already severely impacted during commuting hours;*

3. *Traffic impact and signaling at the intersections of*

- a. La Cienega and Pico Boulevards;*
- b. La Cienega Boulevard and Whitworth Drive;*
- c. La Cienega and Olympic Boulevards;*
- d. Crescent Heights and Pico Boulevards;*
- e. Crescent Heights Boulevard and Whitworth Drive;*
- f. Crescent Heights and Olympic Boulevards;*

4. *The impact of parking restrictions on Pico and Olympic Boulevards on the adjacent residential streets;*

Response 206-3

The EIR evaluates potential impacts on the vehicular circulation network, including surface streets and freeways, at a programmatic level using the City of Los Angeles' Travel Demand Model. It is unknown when the VEN will be achieved at this time. The MP 2035 establishes a vision and strategy to guide future modifications to the City's transportation and mobility system. Decision makers will use the MP 2035 as a guide in allocating often scarce resource dollars when determining future mobility improvements. See **aster**

Response 1 for the EIR analysis and conclusion on traffic impact methodology. See **Master Response 18** for the EIR analysis and conclusion of cut-through traffic and **Master Response 3** for the EIR analysis and conclusion of parking. **Master Response 19** also provides the EIR analysis and conclusion on the implementation of the MP 2035. **Master Response 17** provides information for the EIR analysis and conclusion on the enhanced network treatments on Pico and Olympic Boulevards.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 206-4

5. *The safety of pedestrians on Pico and Olympic Boulevards;*

Response 206-4

The commenter's concerns/opinions regarding pedestrian safety on Pico and Olympic Boulevards will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 24** regarding the safety of pedestrians and other vulnerable populations.

The VEN is intended to improve the flow of vehicular traffic without compromising safety for other modes or increasing speeds beyond the target operating speed. It is not reasonably foreseeable at this time what the target operating speeds would be for specific segments. Target operating speeds on the VEN are set according to the street classification and do not vary according to Enhanced Network designation. The MP 2035 provides a roadmap for achieving a transportation system that balances the needs of users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation. **Master Response 17** provides information for the EIR analysis and conclusion on the enhanced network treatments on Pico and Olympic Boulevards.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 206-5

6. *Air and noise pollution on the South Carthay community.*

Response 206-5

See **Master Response 22** and **Response to Comment 206-1** above regarding the scale of analysis. See also **Master Response 4** for the EIR analysis and conclusion regarding the air quality analysis.

Section 4.5 Noise and Vibration of the EIR assesses noise associated with pedestrian, vehicle, transit, and bicycle enhancements. Because the transportation improvements do not occur within the South Carthay community, and are located on the perimeter, potential effects that could potentially divide or disrupt the community are not anticipated, except for potentially diverted traffic. The extent to which trips would divert to adjacent local roadways is not reasonably foreseeable given the broad framework of the MP 2035 (see **Master Response 18**) and the Enhanced Networks, and therefore, impacts cannot be precisely determined. However, it is anticipated that increased traffic could occur on local roadways. However, in general, doubling of traffic volumes (which would result in a perceptible audible increase) is not anticipated along local roadways.⁴⁵ In some cases where a doubling of volume could occur because existing traffic volumes are so low. Although mobile noise levels may increase along these segments, it is anticipated that these low-

⁴⁵California Department of Transportation, *Technical Noise Supplement*, September 2013.

volume segments have existing noise levels within the compatibility guidelines presented in **Table 4.5-1** of the EIR and any increase would not result in incompatible noise levels.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 206-6

Equally important, the Plan in its Current form appears to be an incremental step back towards the rejected "Olympic/Pico One-Way" proposal attempted by the City of Los Angeles in 2008. As a result, the EIR must take into account the cumulative impact of potential future modifications to the Pico and Olympic Boulevard corridors.

Response 206-6

The EIR analyzes the vehicular circulation network under project conditions as described in the Project Description. The effect of implementing the VEN improvements on portions of Olympic Boulevard is analyzed; Pico Boulevard is not identified as part of the VEN. **Master Response 17** provides information for the EIR analysis and conclusion on the enhanced network treatments on Pico and Olympic Boulevards. The traffic analysis for the project incorporated cumulative development into the Travel Demand Model. See **Master Response 1** for additional details.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 207

Stevie Stern

United Neighborhoods of the Historic Arlington Heights, West Adams and Jefferson Park Neighborhood Council

Comment 207-1

But while noise and air pollution are clearly the result of existing streets that are poorly designed towards quality of life, the only accommodation the draft plan currently provides is an attempt at reducing vehicular use per capita (Policy 5.1) and average vehicle speeds (Policy 5.2). Neither of these policies will have a significant impact on reducing the noise and air pollution experienced on throughways that have been placed in residential communities.

Response 207-1

The comment does not relate to the adequacy of the air quality or noise analyses in the EIR. The comment has been forwarded to the decision-makers for their consideration in taking action on the MP 2035. Note, that reducing vehicle use per capita does remove vehicles from the roadway network and reduces associated mobile source emissions.

The commenter provides no specific comment on the environmental conclusions of the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 207-2

As such, the plan provides no means of consideration of zoning type, historic designation, or character in the design and modification of roads, and thus no means of correcting streets that provide everyday nuisances to residents.

The plan should create an additional policy to set target maximum levels of noise pollution acceptable from roadways as measured from the front doors of commercial properties, and from the bedroom windows of residences. This policy should trigger traffic calming to reduce the speed, sound, and vehicle volume of roads that cause nuisance to community members, while improving non-nuisance generating mobility options such as walking and biking. Further, the plan should expand the policy goals of "Air Pollution Mitigation" (Policy 5.4) to address the reality of existing roadways whose design is not likely to be triggered by redevelopment, and identify a means of improving these conditions for the betterment of local residents and businesses. The plan should identify a way to make streets about neighborhoods themselves, rather than about passing through them.

Response 207-2

The project objectives and goals do not include reducing exposure to mobile source noise. **Section 4.5 Noise and Vibration** of the EIR assesses potential noise impacts associated with pedestrian, vehicle, transit, and bicycle enhancements. The City of Los Angeles has published CEQA significance thresholds to be used in noise analyses. The City of Los Angeles CEQA Thresholds Guide includes a community noise exposure table that addresses land use consistency (**Table 4.5-1**). This table was utilized in the assessment of project-related noise.

The comment states that the plan should expand the policy goals of "Air Pollution Mitigation" (Policy 5.4) to address the reality of existing roadways whose design is not likely to be triggered by redevelopment, and identify a means of improving these conditions for the betterment of local residents and businesses. The comment does not relate to the adequacy of the EIR air quality analysis. The comment has been forwarded to the decision-makers for their consideration in taking action on the Plan. As part of the proposed project, each Enhanced Network is composed of a combination of one or more of enhancements, some which are designed to create neighborhood friendly streets (BEN and PED) and others, which are designed to facilitate movement through the City (VEN).

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 208

Terri Tippit
West of Westwood HOA

Comment 208-1

Removing a travel lane in each direction for bike lanes on Westwood is a mistake. Westwood has some of the worst traffic conditions in the entire area being a Secondary Highway that carries approximately 26,300 to 34,100 vehicles on a typical weekday. The existing Level of Service (“LOS”) at all intersections ranges from grade E to F at peak hours. The impacts would create parking disruptions, traffic disruptions, which would have negative impacts on both noise and pollution. We believe greenhouse gas emissions would increase due to the project. Emergency response times have not been fully evaluated and must be considered.

Response 208-1

The commenter’s concerns/opinions regarding travel lane removal will be forwarded to the decision-maker for consideration in taking action on the project.

See **Master Response 10** for the EIR analysis and conclusion regarding Westwood Boulevard. See **Master Response 4** for the EIR’s analysis of potential air quality effects. See **Master Response 14** discussing the EIR analysis of emergency vehicle access and response times. The EIR determined that a potentially significant and unavoidable impact would occur to emergency access and response times.

Refer to **Response to Comment 200-8** for the EIR analysis and conclusion of potential noise and GHG effects.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 208-2

Residents and businesses are the two groups likely to be most heavily impacted from the proposed changes. The prior group would be impacted as motorists cut through residential neighborhoods in an attempt to avoid traffic. The latter group would likely suffer from a loss of patronage due to increased congestion and parking limitations. The DEIR is incorrect and inconsistent with the determination that there would be “no impacts related to land use compatibility.” The report says that the projects loss of parking spaces could increase VMT that would “typically be off-set by a reduction in vehicle trips due to others who are aware of constrained parking conditions.” Assuming this is true, it would create land compatibility issues to commercial venues via the decreased patronage associated with people who choose not to go to the businesses because of the constrained parking situation.

Response 208-2

See **Master Response 3** for the EIR analysis and conclusion of parking and **Master Response 18** for the EIR analysis and conclusion of cut-through traffic.

The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 208-3

The Expo project will contain light rail stations at Westwood (5,237 daily transit boardings) where it crosses Exposition Blvd in the area of the proposed bicycle lane project. The California Environmental Quality Act

(“CEQA”) requires that any project seeking approvals which require an environmental impact study must consider, among other things, Cumulative Impacts. We fail to see where the DEIR has addressed the increased bus volumes and traffic resulting from the Exposition Corridor Transit Project Phase 2 (“Expo”). The Casden project located at Sepulveda and Exposition is also projected to impact most intersections in the area. There was no mention of the cumulative impacts with this project in the DEIR. Increased levels of delay, loss of neighborhood parking, the likelihood of cut-through traffic into the neighborhood, additional delay for emergency responders, and impacts to air quality must all be examined in light of other project approvals and anticipated approvals in the bike path project area. The cumulative impacts paired with train crossings, increased bus traffic and other changes threatens to increase bottleneck heading north and south on Westwood.

Without a full study of the cumulative impacts, the proposed mitigation measures cannot be adequately evaluated and are not sufficient. T4, particularly, as it is not a pre-mitigation is not what this community would like to see because it fails to mitigate anything. The changes to Westwood Blvd should not be tolerated based on their environmental impacts that cannot be mitigated. Of the options offered, LU1 is perhaps the best. However, as of yet, the City has not offered any parking strategies to deal with the offsets to commercial parking described above.

Response 208-3

The commenter’s concerns/opinions regarding its opinion of the best option and impacts to Westwood Blvd, cumulative impacts and proposed mitigation measures will be forwarded to the decision-maker for consideration in taking action on the project. The EIR did consider cumulative impacts, including from the Expo line. The EIR analyses address the cumulative development and transportation improvements anticipated for the year 2035 based on the 2012-2035 RTP/SCS, which is a regional planning document; the cumulative analysis is not based on a list of cumulative projects. The City of Los Angeles’ Travel Demand Model, used to help evaluate potential impacts from the MP 2035, includes the completion of the Expo Line Phase 2 project (as documented in **Appendix C**). The model is also built on the comprehensive land use and socioeconomic data developed for the 2012-2035 RTP/SCS, which includes cumulative land use changes anticipated in the City through year 2035. Cumulative Impacts (including air quality) from the proposed project are discussed in Section 6.1 of the RDEIR. The MP 2035 would result in significant and unavoidable impacts after mitigation to traffic congestion, emergency access, and operational noise associated with bus traffic. These impacts would be cumulatively considerable when combined with impacts from City projections regarding growth, land use and growth. See **Master Responses 18, 4, and 14** for the EIR analysis and conclusion of cut-through traffic, air quality and emergency response times, **Master Response 3** for the EIR analysis and conclusion of loss of parking, and **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035.

The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 208-4

The project alternatives covered in the DEIR are much too broad and lack a realistic discussion of the feasible alternatives in each localized area pertaining to each proposed change. For example, there is no discussion of bike lane alternatives to Westwood Blvd. As we have stated previously, completing a bicycle network on Sepulveda between Venice Blvd and Santa Monica would result in a route that connects Palms to Rancho Park with Century City. We believe Sepulveda to be a superior street to Westwood for bike amenities as it does not have to cross the LRT at grade. Furthermore, it still has the benefit of intersecting with the east to west to Phase II bikeway that is being built and connects directly to the LRT via Sepulveda Station. Since the alternatives in the Mobility Plan are evaluated in aggregate, individualized alternatives for each proposed change are not realistically considered. This is a problem because superior infrastructure possibilities could present themselves if given fair consideration as alternatives.

Response 208-4

The MP 2035 EIR is a programmatic EIR that provides a broad assessment of impacts of the MP 2035. See **Master Response 22** regarding the necessity for an APC level analysis. See **Master Response 12** for the EIR analysis and conclusion of project alternatives and **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035. Sepulveda Boulevard is designated as part of the TEN, as it provides a continuous north-south transit connection in the Westside area, and also connects to the planned Expo Phase II that provides east-west service. The consideration of other roadways parallel to Westwood Boulevard as alternatives to the BEN, rather than adding Sepulveda Boulevard to the BEN, were found to better meet the overall goals and objectives of MP 2035.

LETTER NO. 209

Terri Tippit
Westside Neighborhood Council

Comment 209-1

The BEN apparently has, from whole cloth, adopted the City of Los Angeles 2010 First Year of the First Five-Year Implementation Strategy & Figueroa Streetscape Project Draft EIR (2010 Citywide Bike Plan) within MP 2035. MP 2035 thus fails where the 2010 Citywide Bike Plan also fails, namely in its omission of any analysis of the impacts of making changes to City streets which favor bicycles which currently represent less than 1% of all travel trips. Should people fail to embrace biking, what is the impact to the remaining 99% of all others from increased pollution, noise and traffic, parking reduction, economic cost to businesses? In the event that bicycling doubles, do the benefits at that point ameliorate the impacts to the environment and the 98% who are not bike riders? For instance, the City Mobility Plan fails to perform an urban decay analysis to identify and mitigate cut-through neighborhood traffic; congestion due to searching for parking; air quality impacts, including additional Ultra-fine Particle Emissions from increased vehicle delay; environmental and economic delay to citywide and regional bus network; impacts to City first responder times; the impacts of removing on-street parking for local residents, schools and businesses.

Response 209-1

In response to comments received on the Draft EIR, the RDEIR includes additional model analysis that considers a more comprehensive analysis of installing bicycle lanes. Bicycle lanes on corridors not designated as enhanced networks are assumed to require a conversion of a vehicle travel lane. In the previous Draft EIR, it was assumed that bicycle lanes would not reduce vehicular roadway capacities.

The RDEIR incorporates the analysis of the Bicycle Lane Network, which represents a 775-mile system of bicycle lanes that includes the 719 miles of lanes referred to as the Backbone Network in the 2010 Bicycle Plan, as well as additional lanes that were either installed since 2010. On the 775-mile Bicycle Lane Network, 264 miles are intended to be upgraded as Class IV/Cycle Tracks and the future condition is also represented on the BEN map. While the bicycle lanes in the 2010 Bicycle Plan were included in the MP 2035, the full impact of installing the bicycle lanes to the transportation system was not fully analyzed in the Draft EIR (i.e. no impacts to vehicle capacity were assumed). The impact of the Bicycle Lane Network (assuming that bicycle lanes on corridors not designated as enhanced networks would require a conversion of a vehicle travel lanes) was analyzed as part of the proposed project in the RDEIR.

The commenter's concerns/opinions regarding the MP 2035 will be forwarded to the decision-maker for consideration in taking action on the project. The EIR analyzes the vehicular circulation network under project conditions as described in the Project Description, which includes implementation of the BEN and the updated Bicycle Plan. See **Master Response 1** regarding the traffic modeling methodology and the EIR conclusions regarding traffic impacts from congestion, traffic impacts from people searching for parking. See **Master Response 18** for the EIR analysis and conclusion of cut-through traffic and **Master Response 3** for the EIR analysis and conclusion of parking and impacts to business (urban decay analysis). See Response 200-7 for the EIR analysis and conclusion of first responder times.

See **Master Response 4** for the EIR analysis and conclusion regarding potential air quality effects.

Regarding ultrafine particles, the South Coast Air Quality Management District has not established a methodology or significance thresholds for assessing exposure impacts. Chapter 9 of the 2012 Air Quality Management Plan includes detailed information on the sources and health effects of ultrafine particles. Toxicological and epidemiological studies have identified living near major roadways as a risk factor for respiratory and cardiovascular problems and other health related issues including asthma and allergic diseases, reduced lung function and growth, low birth weight and pre-term newborns, lung cancer and premature death. Ultrafine particles are emitted from almost every fuel combustion process, including diesel,

gasoline, and jet engines, as well as external combustion processes such as wood burning. Consequently, people living in close proximity to highly trafficked roadways and other sources of combustion-related pollutants (e.g. airports and rail yards) may be exposed to significant levels of ultrafine particles and other air toxics.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 209-2

MP 2035 SHOULD NOT RELY ON THE CITY OF LOS ANGELES 2010 FIRST YEAR OF THE FIRST FIVE-YEAR IMPLEMENTATION STRATEGY & FIGUEROA STREETScape PROJECT DRAFT EIR (2010 Citywide Bike Plan) FOR ENVIRONMENTAL IMPACT ANALYSIS.

Response 209-2

See **Response 209-1**. The MP 2035 EIR does not rely on the impact analysis in the document referenced in the comment. The bicycle facilities proposed in the reference Draft EIR are included as part of the MP 2035 Enhanced Networks and/or Bicycle Lane Network. However, the impact analysis is based on the City of Los Angeles Travel Demand Forecasting Model, as discussed in **Master Response 1**. The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 209-3

The 2010 Citywide Bike Plan as proposed would result in the loss of 99 parking spaces on Westwood from National to Santa Monica Boulevard during AM and PM peak hours. The loss of parking and other changes to parking patterns on Westwood Boulevard will increase spillover parking into the adjacent neighborhood streets, especially with three at-grade railroad crossings blocking the north-south streets (Westwood Boulevard, Military Avenue and Overland Avenue) as often as every 2 ½ minutes during AM and PM peak periods, closing those north south streets for 56-112 seconds with each train crossing. Congestion from the reduction in through traffic lanes on Westwood Blvd. will create a redistribution of traffic to smaller less congested neighborhood streets.

Response 209-3

See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035. See **Master Response 18** for the EIR analysis and conclusion of redistribution of traffic due to travel lane conversion and **Master Response 3** for the EIR analysis and conclusion of loss of parking. The EIR analyzes the vehicular circulation network under project conditions as described in the Project Description, which includes implementation of the BEN.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 209-4

In addition, the Bike Plan did not look at the consequences of adding new traffic impacts to already identified impacts from Expo and proposed Transit Oriented Development (TOD) projects such as the Casden Sepulveda in the same area. Nor was new development in Century City accounted for. If the Bike Plan were subject to CEQA they would have been required to do a Cumulative Impacts analysis of all existing and planned future projects in the area. Projects subject to CEQA also must provide effective, enforceable mitigation for impacts.

For MB 2035 to accept the 2010 Citywide Bike Plan for Westwood Blvd. is short-sighted and fails to include the concerns of and impacts to the WNC community.

Response 209-4

The City of Los Angeles' Travel Demand Model, used to evaluate potential impacts from the MP 2035, assumes the completion of the Expo Line Phase II project. The model is also built on the comprehensive land use and socioeconomic data developed for the SCAG 2012-2035, which includes all cumulative land use changes anticipated in the City through year 2035 (as documented in **Appendix C**). See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035.

Comment 209-5

If the proposed Citywide Bike Plan removes one of the existing southbound lanes from Westwood Blvd., then Expo's FEIR and at-grade crossing and mitigation are rendered invalid. The safety of the at-grade crossing as evaluated by Expo, LADOT, and the California Public Utilities Commission requires two traffic lanes in either direction at Westwood Blvd.

In the Westwood light rail crossing plan described by LADOT and subsequently adopted by Expo, two southbound lanes are presumed so Expo did no southbound queuing analysis. Taking away a vehicle lane to restripe bike lanes on Westwood Blvd. will cause unacceptable queuing, possibly all the way back to Pico, as there will be two new traffic signals on Westwood, one at Ashby and one on Exposition just a short block away. Access to Westside Pavilion driveways on both sides of Westwood Blvd. will be impacted, if not altogether impossible during peak periods.

Further, the Expo light rail FEIR offers no more than residential neighborhood street parking to mitigate the loss of parking from the train crossings and station at Westwood Boulevard. As the Westwood station is projected to have the largest volume of daily boardings on the entire Expo line, the ridership will rely heavily on buses to bring passengers. The reduction of parking will increase Vehicle Miles Traveled (VMT) as drivers circle for parking. The additional removal of street parking on Westwood due to bicycle lane implementation will impede deliveries, handicap and elderly access, and first responder access for residents and businesses.

Moreover, Expo LRT anticipates near doubling of the frequency and numbers of buses required to bring passengers to the LRT station and thus they are doubling the length of the bus stopping areas at the Westwood crossing. Removing a traffic lane will delay buses which will delay other drivers leading to diminished air quality.

Response 209-5

See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035. See **Master Response 18** for the EIR analysis and conclusion of neighborhood traffic and **Master Response 3** for the EIR analysis and conclusion of parking. The City of Los Angeles' Travel Demand Model, used to help evaluate potential impacts from the MP 2035, does include the Expo Line Phase II project and also includes the available information on all other programmed future bus and rail transit service in the region. The model is also built on the comprehensive land use and socio-economic data developed for the SCAG 2012-2035 RTP/SCS, which includes all cumulative land use changes anticipated in the City through year 2035.

Comment 209-6

MB 2035 provides no specified standards or thresholds for impact mitigation. With the reduction of CEQA requirements allowed by recent legislation, the mitigation for the Citywide Bike Plan will be a matter of "discussion" as opposed to environmental analysis. The City's message appears to be that increased congestion on City streets is a good thing as it slows down traffic making it safer for bike riders. Driver delay, transit delay,

and increased air pollution seem to be mere collateral damage. The WNC does not agree with this approach at Westwood Blvd. and neither should MB 2035.

Response 209-6

The EIR evaluates the project against established thresholds of significance as specifically described in each issue area of **Chapter 4.0 Environmental Impacts**. The commenter's concerns/opinions regarding cumulative impacts and proposed mitigation measures will be forwarded to the decision-maker for consideration in taking action on the project.

Comment 209-7

The business community along Sepulveda and Westwood and from Century City have expressed concerns for the loss of parking and noted that additional congestion will block their driveways which will impede access. Area residents have commented that overflow parking already impacts residential streets and cut through traffic makes their narrow streets less safe. Our constituents are not against bike lanes in the City but many were opposed to the plan for Westwood and Avenue of the Stars, especially since the bike plan didn't consider Expo Phase 2 light rail impacts or impacts from planned development from projects like the Casden Sepulveda mixed used project. Many residents expressed the valid concern that first responders would be impeded by the reduction of traffic lanes, especially given the increased congestion and traffic impasse created by at-grade rail crossings in the same area as the proposed bike lanes on Westwood Blvd.

Our stakeholders continue to have concerns with community quality of life, street safety and efficiency and diminished air quality from increased street congestion.

Response 209-7

The commenter's concerns/opinions regarding parking and congestion will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 2** for the EIR analysis and conclusion on quality of life, and **Master Response 3** for the EIR analysis and conclusion of loss of parking. See **Master Response 14** discussing the EIR analysis of emergency response times. The EIR determined that a potentially significant and unavoidable impact would occur to emergency access and response times. The City of Los Angeles' Travel Demand Model, used to help evaluate potential impacts from the MP 2035, does include the Expo Line Phase II project and also includes the available information on all other programmed future bus and rail transit service in the region. The model is also built on the comprehensive land use and socio-economic data developed for the SCAG 2012-2035 RTP/SCS, which includes all cumulative land use changes anticipated in the City through year 2035.

Comment 209-8

The project alternatives covered in the DEIR are much too broad and lack a realistic discussion of the feasible alternatives in each localized area pertaining to each proposed change. For example, there is no discussion of bike lane alternatives to Westwood Blvd. Since the alternatives in the Mobility Plan are evaluated in aggregate, individualized alternatives for each proposed change are not realistically considered. MB 2035 fails to provide sufficient details and analysis of individual street and crossing environments to provide adequate information to the public and decision-makers. MP 2035 also fails to examine a reasonable range of alternatives to removing lanes and parking along Westwood Blvd. in light of other existing and proposed projects like Expo LRT, Casden Sepulveda and Century City development.

Response 209-8

See **Master Response 22** regarding the justification for an APC level analysis. See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard and **Master Response 12** for the EIR analysis and conclusion of project alternatives. As discussed in **Master Response 12**, Alternative 3 includes the original project description which includes the

prior plan for Westwood. Therefore, the EIR does analyze two options for Westwood Boulevard. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. The City of Los Angeles' Travel Demand Model, used to help evaluate potential impacts from the MP 2035, does include the Expo Line Phase II project and also includes the available information on all other programmed future bus and rail transit service in the region. The model is also built on the comprehensive land use and socio-economic data developed for the SCAG 2012-2035 RTP/SCS, which includes all cumulative land use changes anticipated in the City through year 2035.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR, including why the City's range of alternatives was unreasonable. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 209-9

For the foregoing reasons, unless MB 2035 is not going to complete the adequate environmental analysis previously omitted by both the Exposition Corridor Phase II Light Rail and the 2010 Citywide Bike Plan, then Westwood Boulevard should be removed from the BEN in the in the CITY OF LOS ANGELES MOBILITY PLAN 2035 DEIR Mobility Element.

Response 209-9

See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035.

LETTER NO. 210

Constance Boukidis
Westwood Neighborhood Council

Comment 210-1

These proposals do not take into account the interests of senior citizens as well as young mothers who have limited navigation options. All of the statements below essentially stating that this proposal will not have any significant impacts on existing uses and are compatible with all uses are simply wrong. An alternative route to Westwood Boulevard must be identified and implemented

Response 210-1

The commenter's concerns/opinions regarding the interests of senior citizens and young mothers will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035. See **Master Response 13** for the EIR analysis and conclusion on safety and **Master Response 24** regarding the safety of pedestrians and other vulnerable populations.

Comment 210-2

The offer of subsequent mitigation measures worked out between DOT and residents will never address the problems that will be both exacerbated and created. A tremendous amount of pass through traffic already exists on these surrounding streets and no more can be tolerated. At least three elementary schools and one middle school lie very close to Westwood Boulevard going north from Pico and increased traffic near them presents grave safety problems.

Response 210-2

The MP 2035's first policy 1.1 Roadway User Vulnerability identifies the value of "designing, planning and operating streets to prioritize the safety of the most vulnerable roadway user." The commenter's concerns/opinions regarding pedestrian mobility and safety will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 24** regarding the safety of pedestrians and other vulnerable populations. See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035. The RDEIR identifies significant and unavoidable impacts to traffic, even after the implementation of mitigation measures.

Comment 210-3

This proposal presents tremendous safety and traffic concerns as well as those regarding the continued commercial viability of Westwood Boulevard.

Response 210-3

The commenter's concerns/opinions regarding the MP 2035 will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of MP 2035.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 210-4

We believe that the impact of such lanes on traffic, residents, and businesses will be extremely detrimental. Furthermore, we believe that these lanes would not provide adequate safety for bicycles due to the tremendous volume of vehicles, including significant bus traffic, that use these thoroughfares. We support the desire to locate and designate safe north/south bicycle routes in Westwood but request that these two streets no longer be considered. We strongly urge Councilmember Koretz and his office to actively promote this opinion

Response 210-4

The commenter's concerns/opinions regarding this proposal will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 2** for the EIR analysis and conclusion on how the conversion of vehicular travel lanes to bicycle facilities could positively affect community character and quality of life. See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035. See **Master Response 13** for the EIR analysis and conclusion regarding bicycle safety.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 211

Joe Jordan
Wilshire Vista Neighborhood Association

Comment 211-1

1) No identification of alternative modes of transportation being offered or explored

Response 211-1

See **Master Response 12** for the EIR analysis and conclusion regarding the additional alternatives developed and analyzed in the RDEIR.

Comment 211-2

2) No time frame of hours where daily parking will not be available. It can only be assumed that it would be the same as in the Olympic Pico 1-way Pair proposal due to the tie-in to rush hour traffic.

Response 211-2

See **Master Response 3** for the EIR analysis and conclusion of parking. **Master Response 17** provides information for the EIR analysis and conclusion on the enhanced network treatments on Pico and Olympic Boulevards.

Comment 211-3

3) No mitigation or mention of establishing parking structures to offset decreased daily parking.

Response 211-3

See **Master Response 3** for the EIR analysis and conclusion of loss of parking. As discussed in **Master Response 3**, the EIR did not identify loss of parking as creating a substantial impact. Therefore, the impacts are expected to be less than significant.

Comment 211-4

4) No commitment to allow or pre approve future modes of transportation that may be shown to be cheaper, less expensive and faster to build, i.e. Personal Rapid Transit. Even along a specific corridor this would be less expensive than some currently offered alternatives.

Response 211-4

See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. The commenter's concerns/opinions regarding future modes of transit will be passed to the decision-maker for consideration. The EIR analyzes the Project Description as it is known at this time; potential future modes of transportation are not reasonably foreseeable in sufficient detail to analyze in the EIR at this time.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 212

Patricia Ochoa
Coalition for Clean Air

Comment 212-1

The Port of Los Angeles and The Port of Long Beach (Ports) expect to triple their cargo volume in the next 20 years. This projected increase in volume will make the cargo processed through the Ports the largest volume ever experienced in the world to date. If not planned accordingly, the projected growth in cargo volume will result in increases of particulate matter, nitrogen oxides, sulfur oxides and other port related emissions. The region is already in extreme non-attainment for ozone and in non-attainment for PM_{2.5}. Therefore any increase in emissions will deprive the region of the air quality benefits gained over the last 10 years and place the health of Los Angeles residents at stake.

Response 212-1

See **Master Response 8** for the EIR analysis and conclusion on Goods Movement with implementation of the MP 2035 and **Master Response 16** for the EIR analysis and conclusion on the City's circulation element.

The MP 2035 is being prepared in compliance with the 2008 Complete Streets Act (Assembly Bill 1358), which mandates that the circulation element of the General Plan be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan. Compliance with the Complete Streets Act is expected to result in increased options for mobility; less greenhouse gas emissions; more walkable communities; and fewer travel barriers for active transportation and those who cannot drive such as children or people with disabilities. The MP 2035 acknowledges the necessary and continued investments that are needed to maintain Los Angeles' roadways in light of the many travelers for whom the automobile is the only viable form of transportation. See **Master Response 15** for the EIR analysis and conclusion on legislative changes and transportation performance metrics.

The proposed project does not affect growth at the Port of Los Angeles and associated air quality emissions. The Port of Los Angeles is an independent, self-supporting department of the government of the City of Los Angeles. Port projects are independently assessed by the Port of Los Angeles governing agency and the Port has developed Clean Air Action Plan to reduce air pollution and associated health risks associated with Port activity. This includes a truck replacement program to phase out older diesel trucks with a new generation of clean truck engines. Refer to the Port's environmental website for information on air quality projects (http://www.portoflosangeles.org/idx_environment.asp).

The comment states that the region is already in extreme non-attainment for ozone and in non-attainment for PM_{2.5}. Regional air quality emissions in the Harbor APC are shown in **Section 4.3 Air Quality** in the RDEIR. **Table 4.3-12** presents mass emissions in the Harbor APC, and **Table 4.3-13** presents emission comparisons between scenarios. Under the proposed project, regional PM_{2.5} emissions would decrease when compared to Existing and Future No Project Conditions. Ozone emissions cannot be directly estimated using the EMFAC model. For assessing ozone emissions, SCAQMD assesses emissions of the ozone precursors volatile organic compounds (VOC) and nitrogen oxides (NO_x). When compared to existing conditions, regional VOC and NO_x emissions would decrease in the Harbor APC. VOC emissions would also decrease when comparing Future With Project to Existing Conditions. When compared to Future No Project Conditions, VOC emissions would increase by 1.2 percent in the Harbor APC and 2.6 percent Citywide. The SCAQMD Air Quality Management Plan lists average daily NO_x emissions in 2030 as 289 tons per day, or 578,000 pounds per day. The Citywide NO_x increase as result of the proposed project would be 0.3 percent

of regional NOx emissions. It is not anticipated that this increase would interfere with SCAQMD's plan for meeting the ozone standards.

The commenter provides no specific comment on the environmental conclusions of the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 212-2

Therefore it is important to mitigate, prevent and reduce exposure from heavy-duty diesel trucks, such as those most often used in the goods movement sector. However, neither this [Plan for a Healthy Los Angeles] Plan nor the Mobility Element currently provides specific recommendations on how to address impacts from the Goods Movement sector on urban public health.

Response 212-2

As noted in **Response 212-1** above the proposed project has no effect on growth at the Port of Los Angeles and associated air quality emissions. The Port of Los Angeles is an independent, self-supporting department of the government of the City of Los Angeles. On a regional scale, heavy-duty trucks associated with goods movement affect the freeway system. The Congestion Management Program (CMP) is a state-mandated program administered by Metro's 2010 CMP for Los Angeles County that provides a mechanism for coordinating land use and development decisions. The CMP was implemented by Metro to analyze the impacts of local land use decisions on the regional transportation system. Since the proposed project is not resulting in land use changes within the City of Los Angeles, the CMP analysis is not required. However, for the purposes of showing changes in travel demand on the state highway system within the City, the CMP analysis was conducted for the CMP freeway segments.

There are 28 CMP freeway monitoring locations within the City of Los Angeles. As discussed in **Section 4.1 Transportation, Parking, and Safety** of the EIR, one CMP freeway monitoring location was identified as an impacted location (i.e., the Hollywood Freeway (101) north of Vignes Street). This CMP freeway monitoring location is located near downtown Los Angeles and away from the Port of Los Angeles. This freeway segment does not support significant Port-related traffic, and it is not anticipated that the impact is related to Port activity. The proposed project does not include changes to the movement of goods and, therefore, has not identified a regional mobility impact related to goods movement.

Goods movement is a regional issue that requires multi-jurisdictional coordination. The SCAG 2012-2035 RTP/SCS is a regional plan that includes a detailed assessment of goods movement and affects to air quality. As discussed in **Section 4.1 Transportation, Parking, and Safety**, the proposed project would not interfere with implementation of the 2012-2035 RTP/SCS.

On a local level, **Section 4.1 Transportation, Parking, and Safety** of the EIR identifies an 8.74 percent increase in Harbor APC segments operating at Levels of Service E or F between existing and future with project conditions. Mitigation Measures **T1** through **T6** would reduce impacts to the transportation system, including impacted intersections located in the Harbor APC. However, implementation of Mitigation Measures **T1** through **T6** would not reduce the level of impacts to a less than significant level and therefore the EIR identifies significant and unavoidable impact related to level of service of roadways within the City based on current thresholds.

Regarding diesel emissions from trucks, it is possible that emissions would increase along roadway segments that become more congested as a result of the proposed project. The CARB Air Quality and Land Use Handbook uses 100,000 vehicle per day as a screening threshold for assessing sensitive receptor exposure near roadways. The SCAQMD has not published guidance related to a mobile source health risk assessment associated with surface streets. None of the roadways with proposed lane conversions have either existing volumes greater than 100,000 vehicles per day or future volumes with the lane conversion of 100,000 or

greater. Therefore, while diesel emissions from trucks may increase along certain roadway segments, the traffic volumes are not considered high enough to generate a new health risk or significantly increase exposure.

As previously discussed, regional particulate matter emissions in the Harbor APC will decline with the proposed project. On a local level, the majority of truck routes in the Harbor APC are not located near sensitive land uses, and traffic volumes in the Harbor APC do not exceed the CARB screening guidance. For receptors located along truck routes, the Ports Clean Truck Program has reduced port-related truck emissions, including diesel particulate matter, by more than 80 percent. Based on the above information, it is not anticipated that the proposed project would create a new hot-spot or worsen an existing hot-spot in the Harbor APC.

The commenter provides no specific comment on the environmental conclusions of the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 212-3

The objectives related to goods movement highlight the economic benefits but ignore the health impacts from Port related sources. The Plan for a Healthy Los Angeles must include specific recommendations on how to mitigate and reduce emissions from the Port of Los Angeles. Thus, we recommend that the following objective be added to Chapter 4 of the Plan:

Increase the percentage of trucks in the goods movement sector that are zero emission.

Response 212-3

This comment directly relates to The Plan for a Healthy Los Angeles is a new Health and Wellness Element of the City's General Plan. The recommendation for a new objective to be added into Chapter 4 of the Health and Wellness Element has been forwarded to the appropriate decision-makers.

The comment advocating the inclusion of a goal to increase the percentage of trucks in the goods movement sector that are zero emissions has been noted and forwarded to the decision-makers. This goal is in line with Policy 5.4 in the MP 2035.

The commenter provides no specific comment on the environmental conclusions of the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 212-4

2. Identify heavily traveled truck corridors and designate them as zero emission corridors.

In addition to increasing the percentage of goods movement trucks that are zero emission, a zero emission truck corridor must be created. Several other planning agencies have already taken steps to identify truck traffic patterns in an effort to reduce congestion, mitigate truck emissions and to identify the possibility of clean truck routes. For example, the Southern California Association of Governments (SCAG) is exploring an east-west "clean freight corridor" alignment that would allow "clean trucks" to travel from the 710 Freeway reaching I-15 in San Bernardino County.

The City of Los Angeles should use SCAG's approach as an example and work towards identifying heavily traveled truck corridors that expose Los Angeles area residents to poor air quality and begin to transition these "death alleys" into "clean corridors." The Plan must include a Policy Topic on clean truck corridors, such as:

Clean Truck Corridors: Reduce air pollution from highways, truck corridors and local streets by supporting the transition to zero emission trucks in Los Angeles County through identification of "clean truck corridors."

Response 212-4

The MP 2035 includes policy 5.1 Sustainable Transportation which encourages the development of a sustainable transportation system that promotes environmental and public health. In support of this policy the MP 2035 Action Plan includes a new Zero Emission Truck Collaborative program in the Operation category. This program describes the regional collaboration of multiple agencies that was formed to catalyze the development and deployment of zero-emission trucks in the region. See **Master Response 8** for the EIR analysis and conclusion related to Goods Movement for an explanation as to why no changes to truck corridors or routes have been proposed as part of the project. The comment advocating the establishment of Clean Truck Corridors has been noted and forwarded to the decision-makers.

The commenter provides no specific comment on the environmental conclusions of the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 213

Colleen Mason Heller
Cheviot Hills Home Owners Association

Comment 213-1

The CHHOA supports the “Key Policy Initiatives” of MP 2035 (page 7) and extensive efforts were made by the Westside Neighborhood Council neighborhoods (including Cheviot Hills) to be included in the Westside Mobility Study which is incorporated in the City of Los Angeles Mobility Plan 2035 (MP 2035). Many elements as proposed in this study neglect the impacts of existing and yet to be implemented transportation infrastructure which has evolved arbitrarily and irresponsibly in the long standing absence of an updated City Plan. It would be folly to overlay new transportation protocols without addressing the existing liabilities and impacts and yet this MP 2035 draft is doing just that. The rose-colored transportation dreams of year 2035 make no real sense without first looking through a very clear lens at what already exists and what is currently planned. This draft does not do that.

Response 213-1

The EIR assessed the proposed MP 2035 against existing conditions. See **Master Response 1** regarding traffic methodology, existing year traffic and land use data incorporated into the Transportation Demand Model and the analysis of the proposed project compared to existing conditions and Future No Project Conditions. **Master Responses 2** discusses increased congestion and impact on local businesses, cut-through traffic and quality of life from travel lane conversions to bicycle lanes. **Master Response 11** provides for the EIR analysis and conclusion on the development of the MP 2035.

Comment 213-2

There is a fundamental flaw in linking land use only to transportation capacity. The Framework policy 3.3.2 was described as follows by the City: “The policy requires that type, amount, and location of development be correlated with the provision of adequate supporting infrastructure and services.” The Framework EIR further stated that policy 3.3.2 was important: “so that allowable increases in density ... would not occur until infrastructure and its funding was available.” As a result of the above, MP 2035 is inconsistent with the Framework Element. Transportation policies and projects proposed by MP 2035 that are intended to increase density in specific corridors should be tied to infrastructure improvements such as water supply, storm drain capacity and treatment for runoff, electricity, education, emergency services (including LAPD/LAFD response times), etc. The Key Policy Initiative calling for a strong link between transportation and land use must also be linked to infrastructure.

Response 213-2

See **Response 203-1** and **Master Response 7** regarding the relationship to the Framework.

Comment 213-3

MP 2035 presents a disproportionate and short-sighted reliance on alternatives to driving, such as public transit, biking, and walking, without providing actual benchmarks for attainment which would better inform the public as to the cost and benefits of such policies. Just because a policy is given the moniker of “complete streets” does not mean that its implementation is an improvement in terms of actual mobility or in reducing Vehicle Miles Traveled (VMT). For instance, what is the real health and economic cost to the 99% of roadway users delayed when bike riders who are less than 1% of the users are given 50% of the roadway capacity? Should people fail to embrace biking in dramatic numbers pollution, noise and traffic are likely to increase under the plan. How will the plan ensure mitigation for cut-through neighborhood traffic, congestion due to searching for parking, and the impacts of removing on-street parking for local businesses? Even if the number of bike riders doubled or tripled (currently there are three times as many walkers commuting as bicyclists!), at

what point would measurable economic and health benefits accrue to other travelers and the larger community which would offset the impacts?

Response 213-3

See **Master Responses 2** for the EIR analysis and conclusion regarding increased congestion and impact on local businesses, cut-through traffic and quality of life from travel lane conversions to bicycle lanes. See **Master Response 3** for the EIR analysis and conclusion for parking removal. See **Master Response 4** for air quality. See **Response 200-8** for the EIR analysis and conclusion regarding increased noise. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 213-4

So far major transit investments since the early 1990s have not produced an overall reduction in VMT nor are they likely to. The TOD currently planned for the new transit station areas in West Los Angeles do little if anything to reverse the density imbalance pushing up VMT. For instance, mixed use TOD in high rent portions of the City like West Los Angeles target tenants or buyers who cannot afford to work for the wages supplied by the retail anchors attached to the projects. The result is a daily inflow of low wage workers and an outflow of higher wage earning residents. To date, examples are lacking which show any transit ridership has been increased in Los Angeles County by these projects, or that VMT has been reduced anywhere.

Response 213-4

The commenter's concerns/opinions regarding transit investments will be forwarded to the decision-maker for consideration in taking action on the project. The proposed project does not include transit oriented development. The decrease in VMT from Future without Project conditions is primarily attributable to mode shift, which is anticipated to occur with the proposed mobility enhancements that aim to create a more balanced transportation network. See **Master Response 1** regarding the Traffic Impact Analysis Methodology and modeling and **Master Response 15** for the EIR analysis and conclusion regarding transportation performance metrics. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 213-5

Transit ridership increases with employment density. MP 2035 needs to define and support clear and specific land use and mobility policies which will reduce VMT by supporting jobs near transit and transit near jobs.

Response 213-5

The commenter is correct in asserting that transit ridership increases with employment density. The MP 2035 is the transportation blueprint for the City of Los Angeles and seeks to give Angelenos a full range of options to meet their mobility needs, including bicycling, carpooling, driving, transit, and walking. The MP 2035 does not focus on land use policies to reduce VMT by supporting jobs near transit and transit near jobs. These policies are typically developed according to the unique characteristics of an area and are identified within the specific community plans for the area. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 213-6

MP 2035 fails where the 2010 Citywide Bike Plan also fails, namely in its omission of any analysis of the impacts of making changes to City streets in favor of bicycle traffic which currently represent less than 1% of all travel trips. The Bicycle Enhanced Network (BEN) for Westwood and Sepulveda Boulevards directly conflicts with the pathways of the new Expo light rail line. It also conflicts with the intention and operation of the Transit Enhance Network (TEN) bus improvements which seek to increase ridership by speeding up the buses through traffic on Westside streets. While there may be many streets where lane reductions and traffic calming are appropriate, placing such measures on major bus routes are counter intuitive to increased mobility and increased transit use. If a single bicyclist is allowed to impede a bus carrying 60 passengers then intelligent, efficient transit has not been achieved.

At the many light rail stations with no project parking included, increasing transit ridership relies on bus passenger transfers, passenger “kiss and ride” facilities and bike riders. A very careful balance must be achieved to ensure that single occupancy bicycles, which by state law require a 3 feet clearance around them, do not further congest the road space leading to light rail stations?

Response 213-6

The EIR analyzes the impacts of the roadway capacity changes proposed under the MP 2035. **Master Response 1** discusses the traffic impact analysis methodology, and **Master Response 18** discusses the EIR analysis and conclusion on cut-through traffic from travel lane conversions. See **Master Response 15** for the EIR analysis and conclusion on legislative changes and transportation performance metrics. See **Master Response 10** regarding changes to network designations along Westwood Boulevard. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 213-7

Moreover, MP 2035 Key Policy Initiative supporting “first mile last mile” is thwarted by the lack of sufficient passenger parking capacity attached to the Expo light rail stations in West Los Angeles. Additional removal of existing street parking for bike lanes will ensure that traffic circulating for parking will increase VMT and will negatively impact air quality for neighborhoods abutting the train stations and crossings. It is unreasonable for MP 2035 to assume that with no site specific analysis, bicycle parking can poach additional vehicle parking without significant impacts to the surrounding community. To reduce VMT MP 2035 should encourage construction of City parking lots or seek public/private shared lots that are appropriately priced.

Any plan to replace vehicle parking requirements with bicycle parking requirements is inherently flawed if no analysis was performed to validate such replacements/reductions. Likewise any replacement of vehicle curb parking with bike parking without an impact analysis for air quality, increased VMT due to vehicle delay, and overflow parking in residential neighborhoods is invalid. Bicycle policy should be integrated into a comprehensive transportation plan that improves mobility and lessens impacts for all modalities.

Response 213-7

Although not required for analysis at this time under the CEQA Guidelines, the RDEIR does include a discussion of the project’s expected impacts to VMT. (**Table 4.1-28 in Section 4.1 Transportation, Parking, and Safety**). The RDEIR concludes Future With Project conditions reduce daily VMT to 80.9 million, which is approximately 1.7 million fewer miles traveled every day than Future No Project conditions. Future With Project daily VMT is forecast to be 7.5 percent greater than Existing levels, and 2.1 percent lower than Future No Project levels. . (page 4.1-55). See **Master Response 3** for the EIR analysis and conclusion of loss of parking. For the purpose of analyzing impacts of the MP 2035, implementation of the BEN and TEN were assumed to result in the conversion of a vehicular travel lane to a bicycle or transit-

related use. The conversions would not result in the removal of on-street parking. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035, and **Master Response 15** for the EIR analysis and conclusion on legislative changes and transportation performance metrics. See **Master Response 4** for the EIR analysis and conclusion regarding potential air quality effects. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 213-8

LAFD reports increased rescue/EMT calls when bike ridership increases. Reducing bike/vehicle accidents depends on separating bikes and vehicles, which in turn depends on massive infrastructure expenditures which are currently unfunded and thus may not be feasible. An increase in biking without adequate infrastructure will cause a significant impact on rider safety and on first responders, not only in increased number of rescues, but in delayed response due to decreased vehicle capacity and diminished Level of Service (LOS) on major streets such as Westwood Blvd. and Sepulveda Blvd. MP 2035 is flawed if it does not consider the increased demand on rescue services which result from increased bike ridership.

Response 213-8

The EIR concluded that there are studies supporting that injury risks go down with bike lane and with increased ridership overall. See **Master Response 13** for the EIR analysis and conclusion on safety with the implementation on the MP 2035, and **Master Response 14** for the EIR analysis and conclusion on emergency vehicle access and response times. The EIR determined that a potentially significant and unavoidable impact would occur to emergency access and response times.

Comment 213-9

In addition, the Expo environmental documents identify delay to first responders but they contend that the delay is acceptable. We have since learned that the response times that Expo relied on in their assertions were longer than reported. That means that the delay from the train's at-grade crossings has a more significant impact than reported. Is that delay still acceptable? MP 2035 would result in even more delay from reducing vehicle capacity in favor of bikes. Would the cumulative delay still fall within acceptable levels for public safety? MP 2035 should support analysis of emergency responder impacts as part of all mobility policies.

Response 213-9

Master Response 14 addresses the EIR analysis and conclusion emergency vehicle access and response times. The EIR determined that a potentially significant and unavoidable impact would occur to emergency access and response times. In the analysis of emergency services, the Travel Demand Model included the Expo Line Phase II project and all other programmed future bus and rail transit service in the region (as documented in **Appendix C**). The model is also built on the comprehensive land use and socio-economic data developed for the 2012-2035 RTP/SCS, which includes all cumulative land use changes anticipated in the City through year 2035.

As discussed in **Master Response 14**, and the EIR, impacts to delays to emergency responders is identified as significant and unavoidable. As such, the decision-makers will need to adopt a Statement of Overriding Considerations to approve the project and decide if the benefits of the project outweigh the significant and unavoidable impacts, including to emergency responders.

Comment 213-10

MP 2035 should develop defined and uniform rail crossing standards for Los Angeles that protects the health, safety and quality of life of its citizens. Nowhere is that more important than in West Los Angeles communities, including Cheviot Hills.

MP 2035 fails to address the proper placement of transit in relation to potential ridership and connectivity. We in Los Angeles are still saddled by incomplete, poorly designed and often misplaced transit options which require huge capital outlay by taxpayers with little payoff. As planned density supported by this draft increases around rail corridors, the health, safety, travel time benefits and economic benefits of grade separation also increases. The human cost and the economic cost of rail crossing accidents can be avoided.

On a related note, MP 2035 addresses reducing automobile speed but neglects to address the at-grade light rail crossings with approved crossing speeds of 55 mph through residential neighborhoods, across highly congested streets and at Overland Avenue and Exposition, 70 feet from an elementary school. Los Angeles is not bound to adopt Metro's policies and should not do so out of convenience or political expediency. MB 2035 should establish speed policies for sensitive areas with a high probability for accidents or in areas with at-risk populations such as seniors or minors. A Los Angeles mobility plan should be able to distinguish wherein the City's interests diverge from those of the County, and be able to override County interests where safety demands it. As has been previously pointed out, many neighboring Cities chart their own course where they see benefit. Los Angeles needs to do the same lest we continue to bear the dire and significant impacts of transit on its way to "somewhere" but never see the benefits.

Response 213-10

See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. The MP 2035 contains the following program: ENG.8 - Grade Crossing Elimination. Work with Southern California Regional Railroad Association (Metrolink) as well as with freight rail operators to eliminate rail/street at-grade crossings on regional passenger rail and freight lines. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 213-11

It is not enough to simply recognize that 38% of the greenhouse gases come from transportation in California. MP 2035 needs to examine the forces that create that 38%. For instance, 30% of all vehicle miles traveled are cars looking for parking.⁴ The Draft neglects to tie parking to the mobility plan in a way that will decrease the 30% of travel wasted in pursuit of insufficient parking options. While squeezing parking options may force some people onto alternative transportation, increased density and "latent demand" will limit any perceptible improvement. Net VMT and resulting GHG will not be reduced by removing parking.

Further, failing street infrastructure causes additional air contaminating vehicle delay on Los Angeles streets. Expansion of mass transit should be tied to greenhouse gas reduction, including in ways that capture the impact mass transit has on delay to existing and future road traffic patterns. Automobiles and trucks moving goods and people are not going to go away. To the extent that MP 2035 fails to address the delay caused by at-grade passenger rail, they fail to account for the GHG emissions resulting from light rail in Los Angeles. MP 2035 fails to address the energy use associated with its proposals, including the energy use required to power expanded light rail service.

Response 213-11

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines,

Sections 15088; 15204(e).) With that said, the EIR does analyze the project against existing conditions as required by CEQA. See **Master Response 11** for the EIR analysis and conclusion on the development of the MP 2035, and **Master Response 15** for the EIR analysis and conclusion on legislative changes and transportation performance metrics.

Comment 213-12

Expo's environmental documents predict local air quality impacts for light rail station areas. Stalling bus and auto traffic on route to train stations increases local air contamination. MP 2035 reports, "Statewide vehicle emissions result in more than twice as many premature deaths as car crashes." The "linkage" between land use, transportation and air quality is broken for communities with at grade rail crossings, multiple stations with no parking, and bicycle-priority road diets. Cheviot Hills is impacted by that perfect storm of air quality impacts and has the additional disadvantage of being located between Century City commuters and the I-10 FWY. Those commuter pathways were not studied by Expo, nor are obstructions to those pathways addressed by MP 2035. CHHOA thus supports the Key Policy initiative pledging increased interagency cooperation to end "stove pipe" projects creating unexamined cumulative impacts and taxpayer waste.

Response 213-12

The City of Los Angeles' Travel Demand Model, used to help evaluate potential impacts from the MP 2035, assumes the completion of the Expo Line Phase II project. The model is also built on the comprehensive land use and socioeconomic data developed for the 2012-2035 RTP/SCS, which includes all land use changes anticipated in the City through year 2035 to reflect the Cumulative condition. See **Master Response 4** for the EIR analysis and conclusion of air quality effects. See **Master Response 22** which discusses and explains the scope and/or level of analysis for the EIR.

Comment 213-13

Further, the air pollution section fails to recognize the health impacts on bicyclists exerting themselves in corridors that are choked by pollution. The Western Extension of the Exposition Corridor Light Rail Bike Path is a prime example of a bike path planned and currently under construction proximate to at-grade light rail crossings and stations where significant air quality impacts are predicted by the project's EIR. Additional legs of the City's 2010 bicycle plan also put riders in harm's way by placing new bike lanes on already congested City streets and further decreasing road capacity. The resulting lung searing contamination from cars and buses delayed by reduced street capacity must be accounted for and the economic costs of the resulting healthcare needs to be acknowledged.

Response 213-13

Bicycle riders using new bicycle lanes on high-volume roadways would be exposed to higher pollutant concentrations than riders that use neighborhood routes. However, it is anticipated that bicycle lanes would allow riders to quickly traverse congested areas. Recent exposure concentration studies for particulate matter and CO exposure on different modes of surface transportation (walking, cycling, bus, car and taxi) have been analyzed in urban environments. The studies reveal that pedestrians and cyclists experience lower fine particulate matter and CO exposure concentrations in comparison to those inside vehicles (the vehicle shell provides no protection to passengers).⁴⁶ Additional studies have analyzed the differences in exposure for bicyclists and vehicles for other pollutants, including benzene, toluene, ethylbenzen, and xylene. The concentrations of these pollutants inside vehicles were 2 to 4 times greater than in the breathing zone of cyclists. Therefore, even when factoring in the increased respiration rate of cyclists, passengers in vehicles are exposed to more pollutants than cyclists.⁴⁷ These studies have all found that proximity to the pollutant

⁴⁶Kaur, Nieuwenhuijsen, and Colvile, *Fine particulate matter and carbon monoxide exposure concentrations in urban street transport microenvironments*, Atmospheric Environment, Volume 41, Issue 23, page 4781, July 2007.

⁴⁷Rank, Folke, and Jespersen, *Differences in cyclists and car drivers exposure to air pollution from traffic in the City of Copenhagen*, Science of the Environment, Volume 279, Issues 1-3, page 131, November 2001.

sources has the most significant effect on exposure concentration levels experienced.⁴⁸ Therefore, any increased distance to the vehicle lanes, such as protected lanes, would be effective in reducing potential health effects. In addition, as described above, peak hour pollutant concentrations would be less than State Standards and exposure would not exceed applicable standards. The majority of buses operating within the City of Los Angeles are powered by alternative fuels that do not emit the most harmful Toxic Air Contaminants (TACs) associated with diesel-fueled vehicles – Diesel Particulate Matter. The health effects of air pollution from vehicles (CO) is also discussed in **Section 4.3 Air Quality**, in the discussion of pollutants and effects. As discussed in Response 213-12, the City of Los Angeles' Travel Demand Model, used to evaluate potential impacts from the MP 2035, assumes the completion of the Expo Line Phase II project. See **Master Response 4** for the EIR analysis and conclusion regarding air quality effects.

Comment 213-14

Finally, the MP 2035 draft fails to take into account new pollution indices released by the California EPA, including for Ultrafine Particles. Most of Cheviot Hills is located within a mile of the I-10 Freeway or major pathways to the freeway like Overland Avenue. Any mobility element that increases additional tailpipe emissions should be studied and any net increase should be considered significant. The draft should be recirculated once an analysis of that data is completed and included.

Response 213-14

See **Response 209-1** regarding ultrafine particles. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines, Sections 15088; 15204(e)).

Comment 213-15

Although auto and truck traffic are identified as a leading source of urban noise which increases stress and reduces quality of life, no mention is made of the noise impacts to homes and schools located as close as 30 feet from active light rail crossings citywide. Analysis of the dramatic noise impacts of imposing an at-grade light rail with more than two hundred seventy daily crossings between 4:30 a.m. and 2:30 a.m. was not addressed by MP 2035. Light rail communities like West Los Angeles along the Expo line will never experience another quiet night. The degraded quality of life from three at-grade crossings sited within ½ mile (Overland, Westwood, and Military) sounding the CPUC required train horns and crossing bells will be nearly constant for many homes. MP 2035 misses the opportunity to examine and set reasonable quality of life standards for transportation projects in residential communities. MP 2035 should encourage mandatory minimum study areas for transit projects in Los Angeles in order to truly capture the impacts. If impacts are not identified as part of the project's environmental study, then the costs of mitigation after the fact improperly falls to residents or the City.

Response 213-15

As discussed in **Response 213-12**, the City of Los Angeles' Travel Demand Model, used to evaluate potential impacts from the MP 2035, assumes the completion of the Expo Line Phase II project. **Section 6.1 Cumulative Impacts** of the EIR analyzes the potential noise effects of the proposed mobility enhancements in combination with light rail activity. As indicated in **Chapter 6.0 Other CEQA Considerations**, “[t]he cumulative noise affects of other transportation projects, such as the Metro regional rail system, have been evaluated and mitigated on an individual basis. This includes noises generated at grade crossings. Regarding the project's contribution to grade crossing noise, idling traffic generated less noise and vibration than moving traffic. According the California Department of Transportation Technical Noise Supplement, an automobile generates a noise level of 50 dBA at 5 miles per hour and 65 dBA at 35 miles per hour. Where

⁴⁸Rank, Folke, and Jespersen, *Differences in cyclists and car drivers exposure to air pollution from traffic in the City of Copenhagen*, Science of the Environment, Volume 279, Issues 1-3, page 131, November 2001.

light rail vehicles cross intersections at grade, vehicular traffic would be idle and relatively quiet compared to noise and vibration levels when operating at the speed limit. Therefore, noise from the proposed project would not combine with the elements of the transportation system to produce a cumulatively considerable effect. As discussed in **Section 4.5 Noise and Vibration**, mobility enhancements on the NEN, BEN, and PEDs would not substantially increase noise levels. Therefore, noise from the proposed project would not combine with the elements of the transportation system to produce a cumulatively considerable effect.

The commenter's recommendations regarding MP 2035 policies will be forwarded to the decision-maker for its consideration prior to project approval.

Comment 213-16

Years overdue and beyond the threshold of a new century, Los Angeles is updating its Mobility Plan in the face of global challenges to our environment. Unfortunately, there is so little specificity in MP 2035 that the public cannot feel confident that our City is going forward with city-centric focus on improving mobility for all modalities. MP 2035 shows an apparent willingness to choke traffic to a standstill but fails to provide evidence showing reduction of GHG or other air quality benefits. Our City appears ready to further reduce parking options even as businesses who depend on that parking are struggling to keep their doors open. In West Los Angeles communities like Cheviot Hills, sited in the crosshairs of the I-10 and I-405 freeways and facing the impending Expo light rail project, we see much more to be done by MP 2035 in defense of our City and our neighborhood.

Response 213-16

See **Master Responses 2 and 3** for the EIR analysis and conclusion regarding quality of life, traffic diversion and parking removal. See **Master Responses 4 and 11** for the EIR analysis and conclusion regarding air quality and GHG emissions. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 213-17

The Cheviot community is not encouraged by mobility policies that fail to balance residential density and job density and inappropriate density; that reduce vehicle street capacity by adding bike lanes while increasing buses on the same street; that reduce parking options without surveying parking needs or considering building lots; that fail to set standards for air quality and GHG around sequential light rail stations which do not provide parking, and the myriad other circulation changes suggested. Ambition and hard work are in conflict in this unfinished Mobility Plan. CEQA documents are meant at their core to provide information to an apprehensive public that their interests are being considered. There is not enough information in MP 2035 for residents of Cheviot Hill to have confidence that their quality of life will not continue to degrade from the unexamined traffic, air quality and growth inducing impacts of MP 2035 and the mobility pathways outlined.

Response 213-17

See Response 213-5 regarding density policies. See **Master Responses 1 through 4** for the EIR analysis and conclusion regarding quality of life, GHG reduction, traffic diversion, parking removal, and air quality.

Finally, the commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 300

Amy Raff and Abe Rotchel

Comment 300-1

We live in a neighborhood within a large city where we try to keep out excess traffic and try to have a good quality of life. Along Pico and Olympic there are mostly mom and pop shops that depend on street parking and must have this to survive financially. Your proposed change will only make these businesses close and force more traffic into our neighborhoods.

Response 300-1

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

See **Master Responses 2** and **3** for the EIR analysis and conclusion regarding impacts to neighborhoods and businesses. **Master Response 17** provides information for the EIR analysis and conclusion on the enhanced network treatments on Pico and Olympic Boulevards. The comments will be provided to the decision-maker for its review and consideration prior to project approval.

LETTER NO. 301

Bennett and Marilyn Cohon

Comment 301-1

As residents in the Westwood South of HOA area, we are expressing our concerns about the Bicycle Enhanced Network, especially as it relates to Westwood Boulevard. As part of a coalition of the regional HOAs, Neighborhood Councils, and local businesses, we have tried to find workable answers to the traffic and safety issues in our community. Many of the suggestions presented by the City would have had critical negative impacts on the residential streets surrounding Westwood Boulevard, the small local businesses which form the commercial backbone of our neighborhood, and the traffic flow to UCLA and the other major employment centers in our area.

Response 301-1

See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of MP 2035. Please also see **Master Response 2** for the EIR analysis and conclusion regarding quality of life and traffic diversion.

Comment 301-2

Much of Westwood Boulevard was designed in the early 20th Century and remains a narrow streets, barely accommodating the current 25,000 - 35,000 vehicles. There is little off-street parking, and the local independent businesses would be quickly shuttered if parking would be impacted.

Response 301-2

See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035. Please also see **Master Responses 2 and 3** for the EIR analysis and conclusion regarding impacts to businesses and parking removal.

LETTER NO. 302

Beverly and Andy Crist

Comment 302-1

We are residents of the South Carthay neighborhood and we are opposed to the subject. We already lack sufficient parking in our area, and have too many one-driver vehicles passing too quickly through our neighborhood. This plan will exacerbate both of those problems.

Response 302-1

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

See **Master Responses 2** and **3** for the EIR analysis and conclusion regarding impacts to businesses and parking removal.

LETTER NO. 303

Carole Miller

Comment 303-1

This is a BAD PLAN for our neighborhood. 27 years ago Pico Blvd consisted of all auto body shops. Dozens of them. After the riot in 1994 many shops on Pico were burned to the ground. It's take almost 20 years for Pico to rebuild and become vital. Now in 2014 we have many new shops, restaurants, boutiques, and just about everything on Pico. The neighborhood has changed, property values have increased 600% since 1987, and Pico is now starting to be a cool place to walk around. The businesses still struggle, we need more FOOT traffic, NOT MORE TRAFFIC. THIS PLAN WILL DEVASTATE THE BUSINESSES ON PICO. They will be forced out, the shops will become empty again. This plan will turn Pico in a freeway. NO ONE WANTS THIS.

Property rates will go down. Real estate taxes will go down. Rents will go down.

Response 303-1

Pico Boulevard is identified on the TEN. Implementing the TEN would not result in the removal of on-street parking. On the priority corridors, Comprehensive and Moderate Plus enhancements could convert one travel lane per direction to a bus only lane either during peak periods or for the full day. However, the enhancements would not substantially change the function or purpose of the transportation infrastructure, which could potentially affect the character, access, or composition of surrounding communities. See **Master Response 2** for the EIR analysis and conclusion regarding quality of life and **Master Response 3** for the EIR analysis and conclusion regarding parking removal. CEQA does not address socioeconomic concerns unless they lead to physical environmental impacts. However, environmental documents must address the secondary physical impacts that could be triggered by an economic or social effect. The existing environment is well developed with little vacant or under developed land, which suggests that the demand for commercial business activity is high. While individual businesses could be impacted (a socioeconomic impact), the increased congestion from the loss of travel lanes is not anticipated to lead to the permanent displacement of business leading to blight or physical degradation of any area.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).) The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration.

Comment 303-2

From my understanding when this came up several years ago, there has been NO ENVIRONMENT IMPACT STUDY made on this proposal. I have also heard that it is estimated that the total time saved by drivers would be around 12 minutes. Why would the city do something like this; it does not make good sense. THIS IS A BAD IDEA.

Response 303-2

The Draft EIR for the project was completed in February of 2014 and the RDEIR was completed in February of 2015. The proposed improvements to the VEN could improve travel times by ten percent. The amount of time saved would vary depending on many factors, including, but not limited to, trip destination, trip length, and time of day.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 304

Carolyn Flusty

Comment 304-1

The Encino area on Ventura Blvd. going East has major traffic backup many days for a number of hours. We cannot afford to lose any space in the curbside lane. We already have a park on Ventura Blvd. just east of Balboa that is underused which is a good indication of the lack of need for a parklet.

Response 304-1

The commenter's concerns/opinions regarding the Encino portion of Ventura Blvd. will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 305

Charles Edelson

Comment 305-1

One of our goals should be to achieve maximum separation between bicycle traffic and automobile traffic for the safety of all. I view it as a failure of this EIR that not enough attention is paid to this crucial need for maximum separation.

Response 305-1

Additional facilities providing more separation between bicycles and automobiles is part of the BEN. The BEN is a regional network of low-stress, separated bikeways that is comprised primarily of 150 miles of Class I/bicycle paths (Green Network in the 2010 Bicycle Plan) and 264 miles of Class IV/cycle tracks/protected bicycle lanes. The Class IV bikeways represent a portion of the Bicycle Lane Network described below. Due to limited arterial roadway capacity, primarily on the Westside and within the Hollywood/Mid-Cities area, where opportunities to install a protected bicycle lane is limited, the BEN would be completed with priority streets from the NEN. These Priority NEN streets would typically receive street calming enhancements that provide a safer bicycling experience without reducing vehicle travel capacity. See **Master Response 13** for the EIR analysis and conclusion to the safety of bicyclists.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 305-2

3. The second point leads to this final one. Section 3.2, PROJECT OBJECTIVES states, "The primary objectives of the First Year of the First Five-Year Implementation Strategy and the My Fig Project are as follows:"

"Achieve substantial air quality improvements as a result of mode shift from auto to bike, for example achieve a reduction in ROG, NOx, PM10, and CO emissions;"

The analysis which follows this statement attempts to quantify the improvement in emissions resulting from conversion from automobile to bicycle transportation. However, it does not take into account the increase in emissions caused by the traffic delays predicted in these very same documents as being caused by the impact of bicycle lanes on major streets. In my analysis below I show that the increase in noxious and greenhouse gases caused traffic delays generated at just two intersection near a freeway may be 200 times the pollution saved by the bike lane.

Response 305-2

The objective stated by the commenter is regarding a previous project and not the MP 2035. See **Master Response 4** for the EIR analysis and conclusion regarding potential air quality effects. See **Response 305-6** regarding commenter calculations.

Due to the size of the transportation network, the EIR for the MP 2035 evaluates the environmental impacts on a City-wide level with Area Planning Commissions as subareas. See **Master Response 22** which discusses the scope of analysis in the EIR for traffic and air impacts. The commenter states that the air analysis does not take into account the increased emissions caused by traffic delays caused by the project, specifically related to bike lanes. This is in error. The traffic model, which the air quality analysis is based on, does assume additional traffic congestion from the project (**Master Response 4**). However, the EIR identified no significant impacts to air quality GHG emissions are a large-scale issue without a localized effect. Accordingly, GHG emissions have been assessed based on regional vehicle miles traveled. **Table 4.4-4 in Section 4.4 Greenhouse Gas Emissions** of the EIR shows the total GHG emissions for Existing

Conditions, Future No Project, and Future With Project in each APC. It is anticipated that mobility enhancements associated with the proposed project would reduce GHG emissions by seven million metric tons per year when compared to existing emissions (38 percent reduction) and would reduce GHG emissions by 77,000 metric tons per year when compared to Future No Project condition (less than one percent reduction). **Table 4.4-5** shows the comparison of Future with Project emissions to Existing Conditions and Future No Project emissions. Although it is estimated that regional growth would result in increased regional VMT, the implementation of the GHG engine emission standards, known as the Pavley Rules, would substantially reduce tailpipe GHG emissions. Therefore, the proposed project would result in a less-than-significant impact related to existing GHG emissions.

It is acknowledged that congested roadways with slow or idling vehicles lead to more mobile source emissions than free-flowing arterial and neighborhood roads. However, project-related traffic would not generate emissions that exceed the significance thresholds established by the South Coast Air Quality Management District. See **Master Response 2** for the EIR analysis and conclusion for the relationship between the benefits of physical activity versus exposure to air pollution for bicyclists.

Comment 305-3

From conversations with cyclists and reading the literature, I have learned that safety of the cyclist is best accomplished when the bike lanes and motor traffic lanes are physically separated. Yet when I look at the descriptions of the plans for the Westside, for Westwood Boulevard and Sepulveda Boulevard, I find that there is no physical separation, just a line of paint on the common roadway. While this may be sufficient for broad roadways, it is dangerous for crowded and high motor traffic road ways such as these. I urge you to listen to the wisdom of the cycling public and the existing literature and modify these plans to provide physical separation of motor and bicycle vehicles.

Response 305-3

The commenter's concerns/opinions regarding bicyclist safety will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 13** for the EIR analysis and conclusion to the safety of bicyclists from the project. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 305-4

At first glance the cost of this plan seems to be minimal because only paint striping is involved. However, when the inherent safety issue is considered the opposite is likely to be true. If the City provides bikeways that are unsafe, a reasonable legal case can be made that the City is liable for damages if, or more likely when, a cyclist is injured.

Response 305-4

The commenter's concerns/opinions regarding bicyclist safety will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 13** for the EIR analysis and conclusion on safety with the implementation of the MP 2035. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 305-5

By contrast, Motor was a narrower two lane road with parking on both sides. Traffic moved well and there were seldom delays that caused traffic to back up at intersections. A year ago bicycle lanes were installed between

National and Venice and this required removing two lanes of auto traffic. The southbound problem occurs at National Boulevard. During evening rush hours, at first traffic was backed up past Manning Avenue. After people learned how bad the situation was and diverted to other streets such as Overland, it only backs up half way to Manning. I drive that route about twice a week. Since the bike lanes were installed a year ago, I have seen perhaps a dozen bicyclists. We have added significant congestion to provide two empty and unused bike lanes. This is an example of a severe unbalance between the negative impact on motorists and the benefit to cyclists. During the times of my personal observation I have seen few bicyclists benefit while I have seen hundreds of motorists delayed about ten minutes each to traverse the less than one mile route south from Manning to Venice.

Response 305-5

See **Master Response 15** for the EIR analysis and conclusion on legislative changes and transportation performance metrics. The commenter's concerns/opinions regarding bicycle lane usage will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 1** for the traffic impact analysis methodology. The EIR identified as impacts to traffic in multiple areas as significant and unavoidable, including from added congestion. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 305-6

So, as a Professional Engineer used to solving problems, I thought I would try to do a calculation of the pollution benefit resulting from the implementation of the LA DOT Bicycle Plan in the Westside. I took just two proposed bikeways, Sepulveda Boulevard and Westwood Boulevard and their impact on just one street, Santa Monica Boulevard.

I assumed that each bikeway might have about 50 riders during a typical rush hour (about two hours) for a total of 100 trips. Favoring the bicycle argument, I ignored the possibility of ride-sharing and calculated that this might remove 100 car trips which might average 15 minutes each. So the City would save about 1500 minutes of car pollution. Very good.

But wait! To balance this I looked at how much pollution might be generated by delays in automobile traffic. The EIR indicates that delays to traffic on Santa Monica Boulevard would total about 5 minutes if we combine the delays at Sepulveda and at Westwood Boulevard. Presently the westbound backup east of the 405 freeway extends to about Westwood Boulevard at rush hours. I judge that a five minute delay would extend the backup to about Beverly Glen Boulevard, about a mile. If the average spacing of bumper to bumper cars in a backup is about 12 feet, then in the mile of added backup we will have 440 cars in each of three westbound lanes. To a reasonable approximation the same delays will occur for east bound traffic. The bike lane at Westwood Boulevard will generate an eastbound backup past Sepulveda and the Sepulveda bike lane will extend it well past the freeway. So we will have three eastbound lanes of automobiles also tied up for about a mile. So a total of six lanes of traffic are affected. Multiply the 440 cars by the six lanes and we have 2640 cars stuck in traffic over the two hour rush period. This means that in the two hour rush we will have 2640 times 2 hours times 60 minutes per hour of added pollution. This comes out to be 316,800 minutes of car pollution added by the implementation of the two bike lanes on just one Westside street, Santa Monica Boulevard.

Here is the comparison. To save 1500 minutes of car pollution by encouraging bike riding, the bike lanes will cause 316,800 minutes of car pollution. That is, we increase pollution by a factor of 200 times on just one street near the 405 Freeway for one of the two rush hours per day. I think this is a bad trade off. It is the Law of Unintended Consequences coming home to roost with a vengeance.

On the other hand, perhaps my numbers are wrong. But then where are the numbers in the Plan or the EIR or the supporting documents? Have such comparisons of the benefits versus the unintended problems caused by this plan been done? Until this is done I claim this planning is not ready for prime time, except as an example of poor City planning.

Response 305-6

Santa Monica Boulevard already contains a bicycle lane from Sepulveda to Westwood Boulevards. No additional changes would occur which would increase the vehicle queuing along this segment. No additional changes would occur that would increase the vehicle queuing along this segment. It is acknowledged that congested roadways with slow or idling vehicles lead to more mobile source emissions than free-flowing arterial and neighborhood roads. The pollutant most affected by traffic delay is carbon monoxide. Typically as vehicle speed decreases carbon monoxide emissions increase. This issue is discussed in detail on page 4.3-26 of **Section 4.3 Air Quality** in the RDEIR:

“Where capacity is reduced there would be an incremental reduction in vehicle speeds along the affected street segments and there would likely be a localized incremental increase in carbon monoxide emissions. Localized high 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 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.

The reason for this conclusion is that the existing ambient carbon monoxide levels are extremely low within the Los Angeles Air Basin. The one-hour concentration is typically 2 ppm and the 8-hour concentration is typically 1.4 ppm according to monitoring data for the SCAQMD monitoring station located in West Los Angeles. The Air Basin, in fact, has been designated a maintenance area for carbon monoxide which means that that both State and federal air quality standards have been 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 in over an 8-hour period. Because of the low ambient carbon monoxide condition, even under a theoretically worst assumption 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 exceedence of the carbon monoxide air quality standard, and there could be no significant impact.”

This conclusion was demonstrated through a localized pollutant concentration analysis for a City street with a volume approaching 35,000 vehicles per day (La Brea Avenue between Beverly Boulevard and 6th Street. The analysis was completed using the CARB CALINE4 model and assuming that peak hour traffic is commonly ten percent of average daily traffic. The highest hourly delay at this intersection was assumed to be 215 seconds per vehicle during the AM peak hour (based on modeling performed for a bicycle lane). It was assumed that these vehicles would travel five miles per hour during the delay period creating a constant 0.3-mile emissions source. The results of the analysis and applicable standards are shown in **Table 4.3-15**.

TABLE 4.3-15: MOBILE SOURCE POLLUTANT CONCENTRATIONS		
Pollutant	Concentration	State Standard
CO (One-Hour Concentration)	3.5 ppm	20 ppm
CO (Eight-Hour Concentration)	2.6 ppm	9.0 ppm
NO ₂ (One-Hour Concentration)	0.0 ppm	0.18 ppm
NO ₂ (Annual Concentration)	0.0 ppm	0.030 ppm
SOURCE: TAHA, 2015.		

The results show that the significantly increased delay at the already congested intersection would not cause an exceedance of the applicable standards. CALINE4 does not model ozone concentrations. NO₂ is a precursor to O₃ and NO₂ concentrations show the potential for increased localized ozone concentrations. In addition, CALINE4 presents PM emissions in parts per million which cannot be compared to the State standards listed in micrograms per cubic meter. The CO and NO₂ concentrations are well below the standards and local roadways are mostly traveled by gasoline powered vehicles. These vehicles emit less particulate matter than diesel powered vehicles. In addition, particulate matter generated by tire wear would not increase because traffic volumes would not increase. Similar to the modeled pollutants, it is not anticipated that particulate matter emissions would be significant.”

The calculations by the commenter are overly simplistic and do not represent an accurate depiction of air quality dispersion modeling and associated emission factors. For example, the commenter estimates that the City would save 1,500 minutes of car pollution using generalized travel assumptions. The calculation does not account for vehicle delay, which was used by the commenter to estimate the 316,800 minutes of car pollution added by the implementation of the two bike lanes on just one westside street, Santa Monica Boulevard.

Refer to **Master Response 4** for a complete discussion of air quality effects. Air emissions are assessed in Section 4.3 Air Quality in accordance with the guidance and methodology established by SCAQMD. The air quality analysis is based on the traffic model developed for the MP 2035. The air quality analysis in Section 4.3 was based on traffic data provided by the project team, pollutant information provided by SCAQMD, and studies completed by the CARB. On a regional scale, the analysis has been completed based on changes to vehicle miles traveled. This is consistent with the methodology used by SCAQMD to establish the emissions inventory in the Air Quality Management Plan and the SCAG emissions inventory in the 2012-2035 RTP/SCS. The entire analysis based on City-specific traffic data is provided in Section 4.3 of the RDEIR. Supporting data, including EMFAC emission rates and calculations is located in **Appendix C** of the RDEIR.

LETTER NO. 306

Chris

Comment 306-1

Any plans to remove traffic lanes and convert them into a Class II bikeway needs to account for the number of vehicles that will be affected by the reduction, the effects of further congestion on the street where the traffic lanes will be removed and the spillover of congestion onto other streets. This needs to be done before any decisions are made.

Response 306-1

The EIR analyzes the vehicular circulation network under project conditions as described in the Project Description, which includes implementation of the BEN. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 307

Debbie & Howard Nussbaum

Comment 307-1

The Westwood area is very unique from greater Los Angeles do not shoehorn “fixes” on to already congested and built out streets. Bike lanes belong on side streets or residential streets if the intent of this MP 2035 Draft EIR is really to improve safety to bike riders and increase the number of riders. Westwood Blvd.’s road width is built out and currently accommodates more vehicles daily than most other street in the city. Most of the intersection in the Westwood area currently function at LOS E or F, especially along Wilshire, Westwood, and Sepulveda Blvd.’s Don’t make things worse for the vast majority of people.

Response 307-1

The commenter’s concerns/opinions regarding the EIR will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 10** for the EIR analysis and conclusion regarding implementation of the BEN on Westwood Boulevard.

Comment 307-2

The vehicle movement at the intersects of Westwood/Wilshire and Veteran/Wilshire are staggering, a good percent of these head to the new 405 Wilshire On-ramps in the PM peak hours. For example, from the I-405 Widening Project FEIR, in the PM peak hours at the Veteran/Wilshire intersection 1099 vehicles per hr. turn west from SB Veteran and 516 vehicles turn west from SB Westwood, both of these streets have double right turn lanes to accommodate these commuters. One of the bike lanes plans suggests removing right turns from SB Westwood Bl. at Wilshire, the numbers don’t add up to promote safety.

Neither Westwood Blvd or Veteran Ave have the road width to add bike lanes in addition to the existing vehicle lanes.

Response 307-2

The commenter’s concerns/opinions regarding the EIR will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 10** for the EIR analysis and conclusion regarding implementation of the BEN on Westwood Boulevard. Veteran Avenue, as described in **Section 1.3 Changes to the Enhanced Network** of the Final EIR, was removed from the priority NEN due to its hilly condition north of Santa Monica Boulevard which does not provide the most comfortable bicycling experience. Therefore it was determined that Prosser Avenue to the east would better serve the bicycling community with a quality north-south bicycle facility. See **Master Response 1** for the EIR traffic impact methodology. The EIR identified impacts to traffic as significant and unavoidable.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 308

Dr. Robert Newport

Comment 308-1

1) No identification of alternative modes of transportation being offered or explored

Response 308-1

See **Master Response 12** for the EIR analysis and conclusion regarding the additional alternatives developed and analyzed in the RDEIR. See **Master Response 11** for the EIR analysis and conclusion on the development of the MP 2035.

The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR, including in the selection of alternatives. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 308-2

2) No time frame of hours where daily parking will not be available. It can only be assumed that it would be the same as in the Olympic Pico 1-way Pair proposal due to the tie-in to rush hour traffic.

3) No mitigation or mention of establishing parking structures to offset decreased daily parking.

Response 308-2

See **Master Response 22** discussing the scope and level of analysis for the EIR. See **Master Response 3** for the EIR analysis and conclusion of parking. **Master Response 17** provides information for the EIR analysis and conclusion on the enhanced network treatments on Pico and Olympic Boulevards.

Comment 308-3

4) No commitment to allow or pre approve future modes of transportation that may be shown to be cheaper, less expensive and faster to build, i.e. Personal Rapid Transit. Even along a specific corridor this would be less expensive than some currently offered alternatives.

Response 308-3

See **Response 211-4**.

Comment 308-4

While my neighborhood is one remove from the area in question (Carthay Circle). We cannot bear any further traffic congestion nor parking competitions, especially with the massive changes coming to us on Wilshire Blvd and Fairfax Avenue.

Response 308-4

The commenter's concerns/opinions regarding traffic congestion will be forwarded to the decision-maker for consideration in taking action on the project.

LETTER NO. 309

Joyce Dillard

Comment 309-1

Data collection, data analysis, and special studies should be coordinated with the needs of the CEQA document being written for the plan. In the interest of efficiency, data collection and analysis should be comprehensive enough to satisfy the needs of both the CEQA document and the general plan. For instance, the traffic analysis prepared for the land use and circulation elements must be complete enough to allow the evaluation of alternative plans, the final plan, and the project alternatives discussed in the general plan's final EIR.

The two alternatives in the EIR with includes No Project and Less Comprehensive Mobility Improvements, leaves all aspects of the Circulation Elements vulnerable and risking the Public Health and Safety. Underground aspects of the Circulation Element are omitted.

Response 309-1

See **Master Response 1** for discussion of the traffic impact analysis methodology used in the EIR. See **Master Response 12** for discussion of project alternatives, including the additional alternatives that were added in the RDEIR, and **Master Response 7** for the EIR analysis and conclusion of required Circulation Element components. **Master Response 16** provides information for the EIR analysis and conclusion on the City's Circulation Element. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 309-2

We need to see Alternatives that address ALL the mandatory Circulation Element issues and includes relevant optional issues based on real data. You do not include Federal regulatory requirements including guidance from Architectural and Transportation Barriers Compliance Board (disabilities)

Public sewer and storm drain systems as well as pipelines and communication and/or fiber optic networks are omitted from the discussion.

Response 309-2

The MP 2035 covers goals, objectives, policies and programs for major thoroughfares, transportation routes, and terminals; existing planning documents by operational departments cover goals, objectives, policies and programs for utilities, airports, ports and harbors. Please see **Master Response 22** for scope/level of analysis in the EIR, **Master Response 7** for the EIR analysis and conclusion of required Circulation Element components, **Master Response 12** for the EIR analysis and conclusion regarding the additional alternatives developed and analyzed in the RDEIR and **Master Response 16** for the EIR analysis and conclusion regarding the City's Circulation Element. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 309-3

You have not identified all sources of Greenhouse Gas Emissions such as Methane and its role in the Circulation Element.

Response 309-3

GHGs, including methane, are discussed on page 4.4-1 in **Section 4.4 Greenhouse Gas** of the EIR. GHG emissions refer to a group of emissions that are generally believed to affect global climate conditions. The

greenhouse effect compares the Earth and the atmosphere surrounding it to a greenhouse with glass panes. The glass panes in a greenhouse let heat from sunlight in and reduce the amount of heat that escapes. GHGs, such as carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), keep the average surface temperature of the Earth close to 60 degrees Fahrenheit (°F). Without the natural greenhouse effect, the Earth's surface would be about 61°F cooler.

In addition to CO₂, CH₄, and N₂O, GHGs include hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and water vapor. Of all the GHGs, CO₂ is the most abundant pollutant that contributes to climate change through fossil fuel combustion. In 2002, CO₂ comprised 83.3 percent of the total GHG emissions in California. The other GHGs are less abundant but have higher global warming potential than CO₂. For example, the global warming potential for CO₂ is 1 while CH₄ is 21 and N₂O is 310. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO₂, denoted as CO₂e. The CO₂e of CH₄ and N₂O represented 6.4 and 6.8 percent, respectively, of the 2002 California GHG emissions. Other high global warming potential gases represented 3.5 percent of these emissions. In addition, there are a number of human-caused emissions (e.g., carbon monoxide, nitrogen oxide, non-methane volatile organic compounds, and sulfur dioxide) that influence the formation or destruction of climate change pollutants.

CO₂ is the primary GHG pollutant from mobile sources. The U.S. Environmental Protection Agency (USEPA) does not list transportation as a notable source of CH₄ emissions, while transportation activity generates 4 percent of N₂O emissions (<http://epa.gov/climatechange/ghgemissions/gases.html>). According to the CARB's 2012 GHG emissions inventory summary, CO₂ represented 99.1 percent of the 50.463 million metric tons of light-duty automobile GHG emissions. CH₄ and N₂O accounted for less than 1 percent of emissions.

The GHG analysis was prepared for CO₂ emissions in accordance with SB 375 emission reduction targets. **Table 4.4-4** shows the total CO₂ emissions for Existing Conditions, Future No Project, and Future With Project in each APC. It is anticipated that mobility enhancements associated with the proposed project would reduce CO₂ emissions by seven million metric tons per year when compared to existing emissions (27 percent reduction) and would reduce CO₂ emissions by 773,000 metric tons per year when compared to Future No Project condition (less than one percent reduction). **Table 4.4-5** shows the comparison of Future with Project emissions to Existing Conditions and Future No Project emissions. Although it is estimated that regional growth would result in increased regional VMT, the implementation of the GHG engine emission standards known as the Pavley Rules would substantially reduce tailpipe GHG emissions. The GHG analysis in **Section 4.4 Air Quality** of the RDEIR assessed emissions with and without implementation of Pavley regulations. GHG emissions with Pavley reductions are shown in **Table 4.4-4** on page 4.4-10. GHG emissions resulting from the proposed project would be significant if the project caused an increase over Existing or Future No Build conditions. Regional GHG emissions would decrease compared to both Existing conditions and Future No Project conditions. Therefore, the proposed project would result in a less-than-significant impact related to generating GHG emissions with Pavley reductions.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 309-4

Mandatory Findings of Significance fall short of the detail needed to prepare an Environmental Impact Report on all aspects of the required Circulation Element, not just a selective approach to some issues.

Response 309-4

The EIR analyzes the Mandatory Findings of Significance for all elements of the project. As discussed in **Master Response 16**, not all required elements of the Circulation Element are being updated with the project

(as allowed by State Planning law). Please see **Master Response 7** for the EIR analysis and conclusion of the Framework. See **Master Response 16** provides information for the EIR analysis and conclusion on the City's Circulation Element. The MP 2035 is a substantive revision of the Circulation Element of the City of Los Angeles General Plan in compliance with the 2008 Complete Streets Act (Assembly Bill 1358), which mandates that the circulation element of the General Plan be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan.

The EIR integrates the requirements from the Framework Element that are related to the transportation network, and is limited to transportation network issues. The EIR does not address other aspects of the circulation element, which includes those systems that move people, goods, energy, water, sewage, storm drainage, and communications. Those aspects would remain unchanged and in place. Therefore, the mandatory findings of significance are limited to those which address the transportation network.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 310

Lori Matson

Comment 310-1

I am very much against this nearsighted, thoughtless, uncaring proposal. Have you given no thought to the businesses along these thoroughfares? How can they survive on these one-way traffic lanes that will be mini freeways?

Pico revitalization has finally made a foot hold in our community. (I have lived in the Wilshire Vista area for that past 12 years.) There are nice little shops and restaurants that offer the residents places to walk and hang out. If this proposed project is approved we will all be living by a freeway. It will destroy small businesses, real estate values, and our community. The property values around Beverly Grove have increased so dramatically because of the walkability of the neighborhood. That is what we are in the process of creating in the Pico/Fairfax/Hausser neighborhood. These kinds of neighborhood are more of what LA needs.

We have sacrificed much too much in LA to car transportation. I strongly oppose this inane project. The planners behind this are not aligned with the community they represent if they approve it.

It is time we came together in LA to support one another - all of us living in LA - to have prosperous enjoyable lives instead of sacrificing the quality of life of the less affluent to make life better for just a few.

Would this type of project be considered in Beverly Hills or around the Grove? Why not? Traffic is worse on Third than on Pico or Olympic. The reason why it will not even be considered there is because it will destroy the neighborhood, and people too influential and invested in the neighborhood will not allow it.

As a resident of the Pico community I will do everything I can to not allow this project to come to fruition.

Response 310-1

See **Master Response 2** for the EIR analysis and conclusion on how the conversion of vehicular travel lanes to bicycle facilities could positively affect community character and quality of life and **Master Response 3** for the EIR analysis and conclusion on parking. **Master Response 19** for the EIR analysis and conclusion provides additional information on the implementation of the MP 2035.

Finally, the comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 311

Luke Klipp

Comment 311-1

I live within 100 feet of a major intersection that has been enhanced to serve cars over the past few decades, with stripes to direct cars around turns, sidewalks cut back to give cars ease of turning and wide lanes, and even an entirely unnecessary right-turn cut-out that serves perhaps 5-10 cars/day and removes a giant section of sidewalk for the thousands of people who walk it every day. The end result of all these "enhancements" is that they just encourage drivers to zip around corners more quickly, endangering pedestrians and other drivers. In the past year, I've witnessed several accidents and myself been nearly hit by cars on several occasions. This intersection is traveled daily by thousands of people on foot and many on bike, including students at a nearby middle school and visitors to local businesses all within the immediate vicinity. Has LA not learned our lesson? There's ample evidence now available that widening streets only does two things: (a) encourages drivers to go even faster (if they can) and (b) increases accidents. The latter might seem counter-intuitive since widening roadways and improving sightlines should give drivers better vision and more space, but in fact it simply encourages them to take more risks and move more quickly, which significantly hampers their ability to see all things happening in front of them and reduces their ability to react quickly to issues on the road ahead. Additionally, for pedestrians, the likelihood of being killed by a car traveling 35 MPH is 3-4 times greater than if that car were traveling 20 MPH.

Response 311-1

The commenter's concerns/opinions regarding pedestrian safety will be forwarded to the decision-maker for consideration in taking action on the project. The majority of the proposed new street designations (see **Table 3-3 in Chapter 3.0 Project Description**) minimize the amount of street widening that will occur in the future to accommodate vehicular travel and preserve more right-of-way for wider sidewalks. Roadway widening would be associated with increased sidewalk widths such that sensitive receptors would be no closer to the travel lane than existing conditions or could become further away. See **Master Response 24** regarding the safety of pedestrians and other vulnerable populations.

LETTER NO. 312

Ronald Ziff

Comment 312-1

First, it envisions an increase in the number of intersections with service levels of D and F of more than 20%. This should be addressed and every possible solution considered.

Response 312-1

The RDEIR analyzes roadway segment operations (not intersections) throughout the City and reports the findings by APC (see **Tables 4.1-19** and **4.1-20**). The commenter's concerns/opinions regarding traffic congestion will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 11** for the EIR analysis and conclusion regarding the development of the MP 2035 and **Master Response 15** for the EIR analysis and conclusion regarding transportation evaluation metrics. **Master Response 16** also provides information for the EIR analysis and conclusion on the City's Circulation Element. The MP 2035 addresses the 2008 Complete Streets Act (Assembly Bill 1358), which mandates that the Circulation Element of the General Plan be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan. The EIR identifies that significant impacts would result from increased congestion as a tradeoff to a more balanced multimodal transportation network. A Statement of Overriding Considerations for all significant impacts identified in the RDEIR would be required before the City Council could approve the project.

The commenter provides no specific comment on the environmental conclusions of the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 312-2

Second, the worst traffic and mobility problem in the country is right here in Los Angeles. Specifically, the problem is the traffic in, through, and around the 405 corridor and the Sepulveda Pass. The plan briefly states that it will not do anything to address the situation. The exact quotations are below. How can a Mobility Plan be drawn up in a manner so as to disregard the greatest Mobility problem?

Response 312-2

The commenter's concerns/opinions regarding traffic congestion will be forwarded to the decision-maker for consideration in taking action on the project. See Response 312-1.

The commenter provides no specific comment on the environmental conclusions of the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 313

Rosalie Preston

Comment 313-1

I am concerned about placing a cycle track on Imperial Highway from Vermont Avenue to Watts because this is a very heavily trafficked street and 120th Street can be used by cyclists more safely.

Response 313-1

Cycle tracks were analyzed as part of the MP 2035 BEN. Cycle Tracks are often the optimum solution for bicyclists on a heavily trafficked street as it provides a greater level of comfort and protection due to the extra separation afforded between the vehicle traffic and the bicyclist. The commenter's concerns/opinions regarding bicyclist safety will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 13** for the EIR analysis and conclusion regarding bicycle safety. While 120th Street tends to run parallel to the Imperial Highway, the two roadways are separated by the I-105 freeway with limited north-south connections. Therefore, 120th Street would not serve many of the uses along the Imperial Highway.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 314

Sarah LaBrache

Comment 314-1

I live in Wilshire Vista near Pico and Fairfax. This area is JUST beginning to experience a beautiful transformation into a lovely, walkable neighborhood with restaurants and coffeehouses, clothing and gift shops. If MP 2035 goes into effect, these shops on Pico will be SEVERELY impacted as will our property values. It will destroy the walkable neighborhood we are beginning to enjoy and have worked so hard to build.

Response 314-1

The commenter's concerns/opinions regarding neighborhood impact will be forwarded to the decision-maker for consideration in taking action on the project. See Response 303-1 regarding changes to Pico Boulevard.

Comment 314-2

Many of the adjacent blocks have apartment buildings with restricted parking that is already congested making parking for shops & restaurants unrealistic. MP 2035 does not mention the following to mitigate the negative impact of the on-street parking:

- 1) No identification of alternative modes of transportation being offered or explored*
- 2) No time frame of hours where daily parking will not be available.*
- 3) No mitigation or mention of establishing parking structures to offset decreased daily parking.*
- 4) No commitment to allow or pre approve future modes of transportation that may be shown to be cheaper, less expensive and faster to build, i.e. Personal Rapid Transit. Even along a specific corridor this would be less expensive than some currently offered alternatives.*

Response 314-2

The commenter's concerns/opinions regarding parking restrictions will be forwarded to the decision-maker for consideration in taking action on the project. See Response 211-4 for the EIR analysis and conclusion of future modes of transportation. See **Master Response 3** for the EIR analysis and conclusion of parking. See **Master Response 12** for the EIR analysis and conclusion regarding the additional alternatives developed and analyzed in the RDEIR. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

LETTER NO. 315

Stephen and Linda Friedland

Comment 315-1

The "Mobility Plan" is an effort to speed traffic to Downtown for those living on the Westside at the cost of diminishing the quality of life in residential and commercial neighborhoods closer to downtown. Do you really wish to destroy the economic vitality of the many small businesses along streets such as Pico and Olympic? Do you really wish to encourage increased traffic and parking in the wonderful residential neighborhoods along the route such as South Carthay? This, so the that those with long commutes might save 5 to 10 minutes.

Response 315-1

See **Master Responses 2** and **3** for the EIR analysis and conclusion of quality of life, traffic diversion, effects to businesses and parking removal. **Master Response 17** provides information for the EIR analysis and conclusion on the enhanced network treatments on Pico and Olympic Boulevards. The existing environment is well developed with little vacant or under developed land, which suggests that the demand for commercial business activity is high. While individual businesses could be impacted (a socioeconomic impact), the increased congestion from the loss of travel lanes is not anticipated to lead to the permanent displacement of business leading to blight or physical degradation of the South Carthay area. See **Master Response 22** for the EIR analysis and conclusion on the level of analysis contained in the EIR. The comments statement on travel time-savings cannot be confirmed at this time given the level of details known about individual projects and their impact/benefit to travel time-savings.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 316

Steward Chesler

Comment 316-1

I do not understand why this is called a Mobility Plan. Mobility is about facilitating the movement of people and goods from one place to another while minimizing travel cost and delay for everyone as a whole. Yet Draft EIR tells a different story. Here, Tables 4.1-19 and 4.1-20 shows the percent of street segments at Level of Service E or F increasing 19.2% in the AM peak and 16.4% in the PM peak with the plan. Meanwhile nothing is mentioned about the change of vehicle hours miles traveled on major arterials despite the fact that it mentions the change for freeways which not the focus of the plan (Table 4.1-32). Maybe it is because it increases. Finally there is nothing about person throughput and speed, major indicators of mobility utilized by Metro, SCAG and others.

Response 316-1

The commenter's concerns/opinions regarding traffic congestion will be forwarded to the decision-maker for consideration in taking action on the project. **Table 4.1-28** of the Draft EIR/RDEIR presents VMT for both surface streets and freeways. Compared to Future No Project conditions, daily VMT with the proposed project increases by 8.3 percent on surface streets. **Master Response 15** provides the EIR analysis and conclusion on legislative changes and transportation performance metrics.

Comment 316-2

Instead the focus is on traffic calming, bicycling, reducing parking and widening sidewalks. This may explain why improving mobility is not one of the six stated goals in the plan. I do not believe this is what most Angelenos expect or want from a Mobility Plan. But if this is what the City leaders want, then at least change the name of the plan to reflect what it is actually proposing.

Response 316-2

The commenter's concerns/opinions regarding the MP 2035 will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 11** for the EIR analysis and conclusion regarding the development of the MP 2035, **Master Response 15** for the EIR analysis and conclusion regarding transportation evaluation metrics, and **Master Response 16** for the EIR analysis and conclusion on the City's circulation element. The MP 2035 is being prepared in compliance with the 2008 Complete Streets Act (Assembly Bill 1358), which mandates that the circulation element of the General Plan be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan. .

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 317

Robert Pflug

Comment 317-1

I am a resident of the Wilshire Vista Neighborhood, and am writing to oppose the mobility plan, identified above. By limiting parking on Pico Blvd., the plan would cripple local businesses, destroy the emergent walking culture on this stretch of Pico, and would force commercial traffic onto already overcrowded residential streets. All this would lead to a reduction of property values, and stifle the ongoing improvement of the neighborhood.

Response 317-1

See **Master Response 2** for the EIR analysis and conclusion regarding quality of life and effects to businesses. See **Response 303-1** regarding changes to Pico Boulevard.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. 318

Jeff Jacobberger

Comment 318-1

As I read Section 4.4 of the Draft EIR for Mobility Plan 2035, its analysis of SB375 and greenhouse gas emissions, and conclusion that the Mobility Element would have a less-than-significant impact, is based entirely on the Pavley mileage regulations and low carbon fuel standards. In this regard, the Draft EIR's SB375 analysis, and analysis of compliance with SCAG's RTP/SCS, does not seem to conform with the Alameda Superior Court's interpretation of SB375.

There is a compelling reason why these analyses must be separate for the Mobility Element. The City of Los Angeles has near exclusive control over its own local land use and transportation policies and programs; due to its representation on the Metro board, the City has a direct role in countywide transportation policies and programs. Through the adoption of robust, enforceable policies and programs to promote biking, walking and transit, the City has the ability to substantially reduce GHG emissions. Conversely, the City has no role in the development or implementation of the Pavley mileage regulations or low carbon fuel standards.

Mobility Plan 2035 and its accompanying EIR should separately analyze GHG environmental impacts of the transportation policies in the Mobility Element (and/or land use policies that might be included in other documents) vs. impacts of policies that might (or might not) be adopted and enforced at the statewide or federal level.

Response 318-1

Potential impacts to GHG (**Impacts 4.4-1** and **4.4-2**) emissions, are quantitatively analyzed and reported in the EIR. The GHG analysis in **Section 4.4 Greenhouse Gas** of the RDEIR assessed emissions with and without implementation of Pavley regulations. GHG emissions with Pavley reductions are shown in **Table 4.4-4** on page 4.4-10. GHG emissions resulting from the proposed project would be significant if the project caused an increase over Existing or Future No Build conditions. Regional GHG emissions would decrease compared to both Existing conditions and Future No Project conditions. Therefore, the proposed project would result in a less-than-significant impact related to generating GHG emissions with Pavley reductions.

Impacts were also assessed based on consistency with SB 375 reduction goals. The 2012-2035 RTP/SCS concluded that, in 2035, regional SB 375 per capita CO₂ emissions would be 20.5 pounds per day without implementation of Pavley mileage regulations and other yet-to-be-implemented low carbon fuel standards, which was determined to be consistent with the SB 375. The SB 375 analysis in the 2012-2035 RTP/SCS did not account for future Pavley reductions. In order to demonstrate consistency with the 2012-2035 RTP/SCS, the SB 375 analysis for the proposed project also does not include Pavley reductions. The non-Pavley emissions analysis is shown in **Table 4.4-9** on page 4.4-16. The per capita emission rate for passenger vehicles and light trucks would be 19.1 pounds per day, which would be less than the SCAG projection of 20.5 pounds per day. Therefore, the proposed project would result in a less-than-significant impact related to SB 375.

LETTER NO. 319

Bennet Cohon

Comment 319-1

I would like to comment on some of the Bicycle Enhanced Network (BEN) features. The proposal for Westwood Blvd. should be removed from the BEN, and the Boulevard should be removed from the 2010 Bike Plan.

(1) Westwood Boulevard is heavily congested and adding bike lanes will reduce vehicular traffic capacity.

(2) Two large developments are set to be built on Westwood Boulevard, one just north of Pico and one just north of Santa Monica Boulevard.

(3) In addition, the Westwood Expo Station will add considerable vehicular traffic when it is completed.

(4) Finally, the proposed upzoning on Pico Blvd just west of Westwood Boulevard will add substantial vehicular traffic.

Response 319-1

See **Master Response 10** for the EIR analysis and conclusion regarding changes to Westwood Boulevard.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 319-2

I suggest that you consider an alternate bike-friendly route, on one of the north-south residential streets adjacent to Westwood Boulevard, with considerably less traffic.

Response 319-21

See **Master Response 10** for the EIR analysis and conclusion regarding changes to Westwood Boulevard. See **Master Response 14** for a discussion of the selected range of alternatives and the requirements of CEQA. CEQA does not require all iterations and component parts to be analyzed as alternatives.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

ORAL COMMENTS FROM PUBLIC HEARINGS

LETTER NO. 400

Comment 400-1

Robert A. Rouge: *Woodman Ave business corridor (b/t Roscoe Blvd and Branford St) has collisions and no sidewalks; Removing parking lane will hurt small businesses; Little room for a bike lane, sharrow would work better*

Response 400-1

The commenter's concerns/opinions regarding collisions and sidewalks along Woodman Avenue between Roscoe Boulevard and Branford Street will be forwarded to the decision-maker for consideration in taking action on the project. Woodman Avenue is not part of the BEN, VEN, or TEN; parking lane removals along Woodman Avenue are not anticipated as part of the MP 2035. A bike lane is already in place along Woodman Avenue between Roscoe Boulevard and Branford Street; additional bike facilities on Woodman Avenue are not anticipated as part of the MP 2035. See **Master Response 3** for the EIR analysis and conclusion of parking. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-2

Rene Trinidad: *Supportive of bikeways but concerned about safety alongside car traffic; Trees uproot the sidewalk; Against bike lane on Wilbur, not enough bicycle traffic to justify.*

Response 400-2

See **Master Response 13** for the EIR analysis and conclusion of bicycle safety. The commenter's concerns/opinions regarding trees and sidewalks will be forwarded to the decision-maker for consideration in taking action on the project. The proposed project does not anticipate additional bicycle facilities along Wilbur Avenue. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-3

Jack: *Neighborhood Native Trail does not need asphalt for bicycle commuters; new Northside path would need tree removal, be directly in sun, and closer to the freeway; recreational bicyclist say existing path is fine;*

Response 400-3

Design characteristics of the Neighborhood Native Trail are not known at this time. The commenter's concerns/opinions regarding the BEN will be forwarded to the decision-maker for consideration in taking action on the proposed project. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-4

Kenny Easwaran: *Wants to see designated bus lanes, and they should be on particular routes. Only one version of TEN plan involves comprehensive enhancements. Believes people should always have option for rapid transit.*

Response 400-4

The commenter's concerns/opinions regarding the TEN will be forwarded to the decision-maker for consideration in taking action on the project. The TEN consists of approximately 300 miles of streets that complement the region's existing and planned rail and busway system. The TEN would improve existing and future bus service on a select group of arterial streets by prioritizing improvements for transit riders relative to improvements for other roadway users. The transit-enhanced streets aim to provide reliable and frequent transit service that is convenient and safe; increase transit mode share; reduce single-occupancy vehicle trips; and integrate transit infrastructure investments with the identity of the surrounding street. The transit technology on these streets would primarily be high-capacity buses. Bus service would be improved with infrastructure improvements in the right-of-way, signal timing and technology improvements, and stop enhancements. Corridor improvements would largely be dependent upon the population and employment densities, congestion levels, roadway conditions and bus frequency. Transit enhancements would evolve over time, such as a progression from curb-running bus-only lanes to center-running lanes with boarding platforms, and possibly light rail in the longer-term. As conditions change, additional corridors may need to be added or improvements upgraded beyond what is initially being considered. The implementation of the TEN would be inherently intertwined with the region's bus providers including, but not limited to, the City's own Department of Transportation, Metro, Big Blue Bus, Culver City Bus and Foothill Transit.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-5

Keenan Sheedy: We should look at shuttle services between transit hubs. Promotes increasing protected bikeways. We need more safety in relation to bikeways.

Response 400-5

The MP 2035 establishes policy 3.5 Multi-Modal Features that supports "first mile, last-mile" solutions such as multi-modal transportation services, organizations, and activities. The commenter's concerns/opinions regarding shuttle services between transit hubs will be forwarded to the decision-maker for consideration in taking action on the project. The BEN includes cycle tracks, which separate bicyclists from automobile traffic. See **Master Response 13** for the EIR analysis and conclusion of bicycle safety.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-6

R.J. Strotz: There is a lack of outreach for both plans. States that outreach is only from the computer. We aren't doing enough advertisements, such as LA Times, LA Weekly, etc.. We also don't have any PSA/radio announcements. States that we are seeing little commentary from citizens. He doesn't think there is enough outreach to Korean, Hispanic, Middle Eastern communities. Wants to know what the plan is for residential neighborhoods.

Response 400-6

See **Master Response 6** for the EIR analysis and conclusion of outreach. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no

basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-7

Rudy Barbee: *Will recent setbacks of the Hollywood plan effect these plans? We shouldn't get sidetracked with all the legal problems of the Hollywood plan. It is important to be steadfast in the implementation of the plan. Little has actually happened in communities that adopted plans, how will this be different.*

We should incorporate back-in angled parking. The growth of bikeways combined with reckless automobile drivers has created a dangerous situation. Should consider bikeways proximity to rec centers and fire stations. Need safe crosswalks around community centers.

Response 400-7

Back-in angled parking is included as a potential strategy in the Complete Street Design Guide. The commenter's concerns/opinions regarding back-in angled parking will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 13** for the EIR analysis and conclusion of bicycle safety. The MP 2035 Pedestrian Enhanced Districts prioritize areas near community services, such as community centers, for pedestrian improvement. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-8

Sherri Franklin: *There needs to be interagency cooperation, including external agencies such as Metro and LA County. We need to create fundable plans and implement them. Data should be made available via census tract and be made available to the general public. We need special zones for bike facilities.*

Response 400-8

Interagency coordination with multiple agencies has occurred and will continue to occur throughout project development, including but not limited to, Big Blue Bus, California Department of Transportation, Culver City Transit, Foothill Transit, Metro, SCAQMD, and Metrolink. For modeling the transportation improvements, the City of Los Angeles is divided into 1,411 Transportation Analysis Zones, each with corresponding socioeconomic data obtained through coordination with SCAG and connections to the roadway and transit networks. In addition, the CMP is a state-mandated program administered by Metro's 2010 CMP for Los Angeles County that provides a mechanism for coordinating land use and development decisions. No projects are being proposed as part of MP 2035, rather it is a conceptual plan for the City as a whole. Program implementation is in large part contingent upon the availability of adequate funding. Funding is likely to change over time due to economic conditions and to fluctuations in the priorities of federal, state and regional funding agencies. None of the projects included can be implemented unless specific funding is made available. Census data by census tract is available for download for all of Los Angeles County at the U.S. Census website, at: factfinder2.census.gov.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-9

Susan Rocha: *On 610 Cypress ave. there is a church that attracts lots of people and there is always double parking. There is too much traffic on this street which causes noise issues.*

Response 400-9

The commenter's concerns/opinions regarding double parking, traffic, and noise will be forwarded to the decision-maker for consideration in taking action on the proposed project. Cypress Avenue is part of the BEN and not part of the TEN or VEN. No parking removal is proposed to occur along this segment. The BEN designation would not result in an increase to existing noise conditions. Although implementation of Comprehensive treatments on the BEN would result in the conversion of existing travel lanes to bicycle lanes, the loss of travel lanes is not anticipated to permanently prevent or disrupt access to surrounding land uses. Recent studies in San Francisco, Toronto, Portland, Austin, Chicago, and Washington D.C. have found that the reconfiguration of transportation right-of-ways in favor of bicycle lanes have had no adverse effect on local businesses and many businesses surveyed during these studies asserted that the bicycle lanes had a positive influence on business activity through traffic calming. See **Master Response 22** for the scope/level of project analysis.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-10

Aracely Rosas: The community needs immediate action. Happy that the city has a goal. There are safety issues such as no lights. Need to focus on ped/bike safety. The sidewalks are tiny in the community. Hyperion Bridge needs pedestrian access . There are safety issues, no lights. Says that they need a skate park.

Response 400-10

Master Response 13 for the EIR analysis and conclusion on safety with the implementation of the MP 2035. In addition, a NEN has been established to provide a network of slow, locally serving streets that connect communities to schools, retail, parks and open space, health care and employment opportunities and PEDs are identified that would be located near schools, transit stations, areas of high pedestrian activity, areas with high collision frequency, or other placemaking opportunities. The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-11

Richard Zaldivar: There is a disconnect between transportation and residence. Need better bike lane education. There is an increased commute time due to traffic. This places stress on local neighborhoods. We should phase in bike lanes to test their effectiveness. There is an environmental impact from slower cars.

Response 400-11

The MP 2035 includes a number of education programs for all types of users (motorists, bicyclists, etc) as well as policies and programs that encourage the use of data collection and analysis to help ascertain the effectiveness of past decisions and to assist with future decision making. See **Master Response 2** for the EIR analysis and conclusion regarding increased congestion and impact on local businesses, cut-through traffic and quality of life from travel lane conversions to bicycle lanes. See **Response 400-10** related to the establishment of neighborhood networks and pedestrian districts.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-12

Jack Fujimoto: We need better traffic enforcement. He is concerned about traffic, especially along Sawtelle Blvd. Wants to have a signal there to help calm traffic flow. Sawtelle has a lot of stop signs, but there are still many areas that don't have any. Need more stop signs on the corners.

Response 400-12

See **Master Response 2** for the EIR analysis and conclusion regarding increased congestion and impact on local businesses, cut-through traffic and quality of life from travel lane conversions to bicycle lanes. See **Response 400-10** related to the establishment of neighborhood networks and pedestrian districts. See **Master Response 22** related to scope/level of analysis in the EIR.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-13

Jean Kuntz: Sees that mobility and health plans are related. Need to focus on alternatives to single use vehicles. Position alternatives to allow smaller vehicles to commute between transit stations. Biking and walking can be increased through education. We need more education for everyone on how to use our streets safely. We should add safety questions to drivers tests. Believes that an increase in alternative mobility options will increase health. States that pedestrian signals have backfired. It should be made clear that pedestrians have the ROW.

Response 400-13

See **Master Response 2** for the EIR analysis and conclusion regarding increased congestion and impact on local businesses, cut-through traffic and quality of life from travel lane conversions to bicycle lanes. **Master Response 13** discusses additional information for the EIR analysis and conclusion on safety with the implementation of the MP 2035, and **Master Response 15** for the EIR analysis and conclusion on legislative changes and transportation performance metrics.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-14

Stephen Resnick: Opposes bike lane on Westwood Blvd. States that entire community is opposed to the plan. Losing parking spaces will hurt businesses in the local community. It will back up intersections. Doesn't believe that removal of turn lane is appropriate.

Response 400-14

See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-15

***Margaret Healy:** Believes that the bike plan for Westwood is a bad idea. Bike counts showed low volume, while car traffic is still high. Businesses need on street parking. Do not increase density along Pico Blvd, the infrastructure can't handle it. The local schools are already overcrowded, where will the new students go? Believes that 5 story buildings next to SFDs are a bad idea. The current zoning around Expo is sufficient, don't need more density.*

Response 400-15

See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035. See **Master Responses 2 and 3** for the EIR analysis and conclusion regarding quality of life and cut through traffic, and loss of on-street parking. The MP 2035 would enhance the existing transportation network, generally limiting improvements within the existing rights-of-ways and would not create conditions that would induce growth. The proposed transportation improvements would be located within a densely developed urban setting and would not extend into previously undeveloped areas that may induce changes in such areas. Therefore, no significant growth-inducing impacts from the proposed transit improvements are anticipated.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-16

***Steve Sann:** The Westwood business community is opposed to the bike lane on Westwood Blvd. It would negatively impact businesses, residents, and public safety. If you look at bus traffic, there are 14 lines to UCLA. Bike lanes would be cut off by the bus stops. The removal of a right turn lane on Wilshire will cause huge impacts. He served on the station advisory board for purple line extension. Believes that when the subway opens massive pedestrian activity will only worsen safety problems with bike lanes. We need to study reasonable alternatives on other streets near Westwood.*

Response 400-16

See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-17

***Jerry Brown:** Would like to reiterate opposition to Westwood Blvd. bike lane. He is very concerned about safety and loss of right turn lane. Disturbed that we did not seek the neighborhood council for more input. Proposed bike lanes appear to be far along in the process.*

Response 400-17

See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR.

Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-18

Wolfgang Veith: States that new development has gone on without respect for the community plan. Says that proposed bike lane on Westwood Blvd. is insane, the previously proposed veloway was a much better idea. Bus density on Westwood is very high. We should connect to existing bikeways on Veteran Ave. and other side streets. He was a bike rider and prefers neighborhood streets. He is concerned about safety since he has been hit twice by open car doors while biking.

Response 400-18

See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of the MP 2035. **Master Response 13** provides additional information for the EIR analysis and conclusion on safety with the implementation of the MP 2035. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-19

Steve Fox: We cant keep adding more people without being concerned about the traffic. We need alternatives before we start adding more people. He does not support toll lanes on freeways, as it will hurt those of lesser means.

Response 400-19

See **Master Response 1** regarding the traffic impact analysis methodology. See **Master Response 12** for the EIR analysis and conclusion of project alternatives. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-20

Meg Foss: need bikeways b/t Sepulveda and 405; handle presence of homeless on bike path; need security on bike path

Response 400-20

The BEN and Bicycle Lane Network propose additional facilities between Sepulveda Boulevard and the I-405. See **Master Response 13**, which provides additional information for the EIR analysis and conclusion on safety with the implementation of the MP 2035. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-21

Quirino de la Cuesta: More bike corrals; better street lighting for dark areas; dangerous to bike at night

Response 400-21

See **Master Response 13**, which provides additional information for the EIR analysis and conclusion on safety with the implementation of the MP 2035. Street lighting guidance is included in the *Complete Streets Design Guide: Great Streets for Los Angeles* (Section 4.13). The commenter provides no specific comment

on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-22

Dianne: Terra Bella is a busy thoroughfare b/t Woodman to the 5 fwy; bike path that's going in will create monumental traffic; people use this street for freeway access

Response 400-22

See **Master Response 2** for the EIR analysis and conclusion on how the conversion of vehicular travel lanes to bicycle facilities could positively affect community character and quality of life, and **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. See **Master Response 22** for discussion of scope/level of analysis for the EIR.

Comment 400-23

Michelle Klein-Hass: Have a lot of transit/bike-dependent constituents; Van Nuys Blvd needs a separated bike lane because traffic is hazardous, discourages bicyclists; there are no amenities for bike parking/racks; need separated bike lanes other than plastic bollards; need k-rail separation

Response 400-23

Due to the large number of transit users and people who bicycle within the Van Nuys Boulevard it is identified on both the TEN and BEN. See **Master Response 2** for the EIR analysis and conclusion on how the conversion of vehicular travel lanes to bicycle facilities could positively affect community character and quality of life.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-24

Ron Ziff: Sepulveda Blvd listed at 331,000 daily trips in the Plan is more than 5 years old; the figure is too low, Metro's recent stats say 498,000 trips w/ another 100,000 trips occurring through the canyon; need bus service from Valley to West LA, and have it connect to Expo, will remove 33,000 cars off the road, affects 1 in 7 city residents; have a chapter in the plan devoted to transit b/t the Valley and West Side;

Response 400-24

The MP 2035 Policy 3.7 Regional Transit Connections and the Citywide General Plan Circulation System Maps identify the importance of establishing a high-quality transit link between San Fernando Valley and the Westside. The Plan does not reference specific data for Sepulveda Boulevard as noted in the comment. The referenced data for traffic volumes was not presented as part of the MP 2035.

Comment 400-25

Lisa Sarkin: Each neighborhood has special circumstances; Ventura Blvd has the most traffic on their stretch (Studio City) next to the 101; no sidewalks in places even though there's \$; removing parking hampers movement, bicycle use won't grow dramatically

Response 400-25

The commenter's concerns/opinions regarding unique neighborhoods will be forwarded to the decision-maker for consideration in taking action on the project. The enhanced networks for the MP 2035 identify

different types of mobility improvements for different areas depending on the street designation and surrounding land uses. See **Master Response 3** for the EIR analysis and conclusion of loss of parking.

Comment 400-26

Gregory Wright: Vehicle idling causes air and co2 emissions, anti-idling signage is needed; headlight glare is dangerous; vehicle noise pollution impacts peds, residents of arterials, transit users; exhaust modifications and after-market devices need to be outlawed and removed via biannual smog inspection; hybrid people street parklet that double as metro bus stops; effective shade structures on bus stops with public art; improve wayfinding; DASH connectors need to be much better promoted (e.g. put at retail stores); Static/dynamic signs that inform drivers of arterial traffic signal progression speed; mobile app to warn drivers of approaching intersections with high collision frequency; more toilet and sink facilities at stations; lenticular panels as art on kiosks.

Response 400-26

MP 2035 Policies 3.5 Multi-Modal Features, 4.1 New Technologies, and 4.2 Dynamic Transportation Information along with program Support Features 13 Mobility Hubs include strategies for improving the quality of the transit experience.

The comment regarding glare is noted, however, the proposed project would reduce overall VMT, resulting in less vehicle use and possibly less associated glare.

See **Master Response 4** for the EIR analysis and conclusion regarding potential air quality effects. The purpose of the MP 2035 is to reduce traffic flow and vehicle idling in an effort to reduce CO2 emissions.

Anti-idling provisions where idling occurs would be considered a project-specific level of detail which are not addressed in this program-level plan. Signal progression planning is accounted for in existing automated traffic systems within the City. The design of progression signage is not considered as part of the MP 2035. A mobile traffic application for drivers would be contrary to State-enforced distracted driving laws and is not considered as a part of this plan.

Refer to **Response 200-8** for the EIR analysis and conclusion of potential noise and GHG effects. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 400-27

Esther Ahn: Supports the plan; fear of cars when bicycling; fear of bicyclists when driving;

Response 400-27

The BEN was developed with these very fears in mind. The commenter's concerns/opinions support for the plan and fear of bicyclists will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 13** for the EIR analysis and conclusion of bicycle safety. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

WRITTEN COMMENTS FROM PUBLIC HEARINGS 401

Comment 401-1

Dean Cohen: *Concern about equestrians ridership 4 and 5 abreast at night and not leaving any room for cars to get by. If you honk then you can startle the horse; they should be restricted to 2 abreast to improve safety*

Response 401-1

Suggestions for equestrian path design is included in the Complete Street Design Guide. The commenter's concerns/opinions regarding equestrian ridership will be forwarded to the decision-maker for consideration in taking action on the project. No features affecting equestrians have been identified as part of the proposed project.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-2

Mark Lopez: *Maps should emphasize North Valley Area; Please describe what TEN is*

Response 401-2

Figure 3-5 of the EIR identifies the locations of the TEN, designations, including the north Valley area. As stated in **Chapter 3.0 Project Description** of the EIR, the TEN consists of approximately 300 miles of streets that complement the region's existing and planned rail and busway system. The TEN would improve existing and future bus service on a select group of arterial streets by prioritizing improvements for transit riders relative to improvements for other roadway users. The transit-enhanced streets aim to provide reliable and frequent transit service that is convenient and safe; increase transit mode share; reduce single-occupancy vehicle trips; and integrate transit infrastructure investments with the identity of the surrounding street. The transit technology on these streets would primarily be high-capacity buses. Bus service would be improved with infrastructure improvements in the right-of-way, signal timing and technology improvements, and stop enhancements. Corridor improvements would largely be dependent upon the population and employment densities, congestion levels, roadway conditions and bus frequency. Transit enhancements would evolve over time, such as a progression from curb-running bus-only lanes to center-running lanes with boarding platforms, and possibly light rail in the longer-term. As conditions change, additional corridors may need to be added or improvements upgraded beyond what is initially being considered. The implementation of the TEN would be inherently intertwined with the region's bus providers including, but not limited to, the City's own Department of Transportation, Metro, Big Blue Bus, Culver City Bus and Foothill Transit.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-3

Tony Wilkinson: *Chase St bt Woodman and Van Nuys is proposed for a lane reduction to enable a bicycle enhanced network. The Panorama City NC has already opposed a lane reduction between Wakefield or Tyrone and Van Nuys.*

The Van Nuys Blvd and Roscoe Blvd is the highest traffic intersection in the valley during peak hours. And the peak hours are increasing in duration. Chase St is increasingly being used as an alternative East-West corridor.

Removing a lane now because current traffic density permits, it may well cause significant disruption as this bypass traffic increases.

Suggest Parthenia from Woodman to Van Nuys; and Rayen from Van Nuys to Sepulveda as a shared lane East West solution.

Van Nuys Blvd has the highest traffic density in the San Fernando Valley (City? US?). It has high adjacent population density. This make it an ideal corridor for federal funds for mass transit.

Van Nuys Blvd is the ideal site for the East San Fernando Valley Transit Corridor, based on federal transportation guidelines. (The consideration of sepulveda Blvd is influenced strongly by some political opposition to transit on Van Nuys)

If the East San Fernando Valley Transit Corridor is placed on Van Nuys blvd, it will take 33 feet out of the middle of the street. This makes it unsuitable for a bicycle enhanced network. A Transit Enhanced Network is the best use.

Woodman Ave is the better alternative for a BEN--a wide, long street with lower traffic volumes.

Van Nuys Blvd and Roscoe Blvd is not only the highest traffic density intersection in the valley, it also has the highest accident rate. LAPD Valley Traffic Division studied the accidents with an eye to making, remediation recommendations or specific enforcement actions.

They were frustrated because of the wide disparity of the accident types and the lack of correlation with one cause.

Van Nuys and Roscoe is a classic example of a "pink" intersection (old mobility plan maps) where a bicycle solution had yet to be identified. I believe the best solution to these intersections is to find a safer path around them when laying out the grid.

The hard and vocal element of the cycling lobby will say "we're there now -- make it safer." the plan serves all cyclists, including non-active dad and kids. The city has an obligation to consider all cyclists in its safety plan for BENs.

The population density maps presented with the bicycle, vehicle, and transit enhanced networks appear to differ on the same streets -- example NS Van Nuys and Roscoe area.

Some factor other than population density must have been involved. I suspect that too much information has been removed from the display maps. The single-scale presented for all 3 maps is not enough to explain why the scale color differ in the same area.

Response 401-3

See **Master Response 19** for the EIR analysis and conclusion on the implementation of the enhanced networks. The commenter's suggestions regarding the various enhanced networks will be forwarded to decision-makers for their consideration in taking action on the project. The MP 2035 is a mix of policies and conceptual-level improvements to the transportation network. Detailed roadway designs for improvements to individual roadways or corridors are not yet available. As individual projects move forward they will be evaluated at a project level as appropriate. The density maps mentioned in the comment were not part of the EIR.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR.

Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-4

Kenny Easwaran: *Wants to see designated bus lanes, and they should be on particular routes. Only one version of TEN plan involves comprehensive enhancements. Believes people should always have option for rapid transit.*

Response 401-4

The proposed project, along with the project alternatives identified in **Chapter 5.0 Alternatives**, identify a combination of Moderate, Moderate Plus, and Comprehensive treatments to the TEN that vary in intensity by alternative. The alternative most representative of the commenter's concern (most comprehensive transit enhancements) is identified as Alternative 5.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-5

Berta Avila: *How does MP 2035 connect/overlaps with LA Bike Plan, particularly in terms of prioritization in low income communities of color? Would like to see more outreach about this plan in these communities. Are efforts being made to connect w/ non profit orgs that can act as connectors/gateways. It's so important that low-income people of color have access to this process and are able to give their feedback and commentary, and to have it be in places that are close to their home and feel safe for them. For example, the Central American Resource Center (CARECEN) in MacArthur Park, would be a great connector to that community that very much needs to have a say in their process.*

Response 401-5

The MP 2035 includes a bicycle plan that has been updated to reflect public input received since the 2010 Bicycle Plan was adopted in 2011 and integrated into this plan. The 2010 Bicycle Plan, in its entirety has been incorporated into the various chapters of the MP 2035 and is no longer a standalone chapter devoted to a single mode but instead reflects the City's commitment to a holistic and balanced complete street approach that acknowledges the role of multiple modes (pedestrians, bicycles, transit, and vehicles). The Technical Design Handbook has been incorporated into the Complete Streets Design Guide, including sections on design needs, bicycle paths, bicycle lanes, bicycle routes and neighborhood friendly streets, network gaps, signalized intersections, bicycle parking, bikeway signage, non-standard treatments, and street sections. CEQA does not address environmental justice issues, which focus on low-income and minority populations. The City of Los Angeles has substantial percentages of minority and low-income populations (compared to State and National percentages) and these groups are dispersed across the City as opposed to being concentrated in certain locations. The proposed transit improvements are distributed on priority streets that also occur throughout the City as seen on **Figure 4.1 of Section 4.1 Transportation, Parking and Safety** of the EIR. Therefore, the provision of these transportation improvements would not be disproportionately concentrated to particular populations.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-6

RJ Strotz: *Ineffective outreach - many residents have no computer access. Why didn't you use newspapers, local tv stations, psa announcements on local radio. Your outreach is the most ineffective for our citizenry*

Response 401-6

See **Master Response 6** for the EIR analysis and conclusion related to outreach. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-7

Skylar Boorman: *Avid cyclist here, interested in my own safety and the health of my community. Glad to hear bike lanes (My Fig) are in the works, and I strongly believe that change in this direction can't happen quickly enough. Cycling promotes clean air and physical health, and with pollution and obesity both at point of crisis, this can't be ignored.*

there IS a cycling community here in LA, but it consists of a tiny sliver of the population who is willing to risk their lives on the streets. There is virtually no structure for average citizens to enjoy the splendor of a sunny day on the bike, in comfort and security. Women, children, elderly, and those who simply have the sense not to set out across Wilshire of some other broken and inhospitable thoroughfare, are noy enjoying the full benefits potential to Los Angeles and we will all live better when this is reflected

Response 401-7

The BEN was developed specifically in response to the types of concerns mentioned by the commenter. See **Master Response 13** for the EIR analysis and conclusion regarding bicycle safety.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-8

Dennis Hindman: *Remove on-street parking on arterial streets. That space could be used to move people in buses and on bicycles. Parking is storage, not movement of people.*

People who drive should not have veto power over whether there is safety improvements on a street for bicycling. auto makers are required to install seatbelts, safety glass, crush zones, air bags, and abs brakes in cars. pedestrians and bicyclists do not have extoskeletons to protect them, they deserve continuous safety improvements like occupants of motor vehicles.

bicycling is denied bicycle lanes on arterials due to low modal share. what is the modal share for park motor vehicles on arterial streets and why do they get preferential treatment?

Allocate lanes on major streets according to modal share. Bicycling has a 1% commuting modal share according to the Census ACS avg over the last 5 years. Bicycling should get 1% of the lanes on arterial streets, which would include parking lanes.

Response 401-8

The commenter's concerns/opinions regarding parking and the allocation of lanes on streets will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 11** for the EIR analysis and conclusion on the development of the MP 2035. The commenter provides no

specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-9

Marc Caswell: Cycle track network should connect always. One gap would make the rider a cycle track is designed for have to become an "experienced cyclist instantly". N/S needs to at least connect to E/W to create a fully integrated grid. The gap in central LA on proposed BEN needs cycletracks to connect rest of network.

Mandatory parking minimums must be eliminated. These policies create undue burden on small businesses and create traffic by inducing driving in communities. LA should end traffic by inducing driving in communities. LA should end all mandatory parking minimums and instead consider parking maximums, such as parts of SF and Portland. LA can't handle more cars -- and there are 5 parking spots for every car. Also, the updated code should prohibit "bundling" parking spots with residential units, allowing property owners to recoup costs associated with construction and allow residents to choose if they want to pay for parking.

Response 401-9

The commenter's concerns/opinions regarding cycle tracks and the elimination of parking requirements will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-10

Michael Macdonald: I support and applaud the mobility element 2035 and its focus on safety and health first. It is an important step for our city to recognize that our public streets belong to all of us, and should be focused on servicing our safety and quality of life, before convenience offered to those that choose to commute in single-occupancy vehicles.

I would like to see the plan go further to outline a "vision zero" plan with a goal of eliminating deaths on our roadways. It appears to me that elements of the VEN are in direct conflict with the plan's goals to this effect. Setting aside corridors at street level that maximize vehicle lanes to maximize vehicle speeds does not benefit stakeholders along those corridors, and allows safety and health to run secondarily to the desires of those who choose to commute by car.

if this city is to truly become a multimodal city, it needs to provide benefits in terms of convenience, safety, and comfort for those that choose transit, walking, and bicycling for their commuting mode.

Response 401-10

Vision Zero is included as an objective in Chapter 1: Safety First. The commenter's concerns/opinions regarding what should be included as part of the MP 2035 will be forwarded to the decision-maker for consideration in taking action on the project.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-11

Jessica Medina: More focus/clear and strong language on pedestrian and cyclist safety at the level/geography of the of/off ramp. How can we make sure these streets are also safe and usable by the community members who live there? Question: what kinds of plans for collaboratin exist in places where LA city boundaries interact with county or other cities' boundaries? (jurisdictional conflict/collaboration)

Response 401-11

Vision Zero to decrease transportation related fatality rate to zero by 2035 is included as an objective in Chapter 1: Safety First. Collaboration is a key component of the MP 2035 Action Plan and opportunities to facilitate collaboration are included in several programs. The commenter's concerns/opinions regarding pedestrian and bicycle safety will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 13** for the EIR analysis and conclusion regarding bicycle safety.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-12

Lisa Duardo: Integrate all LA City depts toward the same goals - reducing co2 and climate change - integrate plan and dollars

As the city is looking into sidewalk and street repairs - look into more permeable repairs and tree retention < mature trees are worth keeping and saving over planing new small trees

Be careful bike lanes don't create more CO2 by increasing auto idling in traffic.

Look into allowing dogs on public transportation wearing soft dog muzzles (see catalina express)

Use shared right lanes instead of eliminating a lane

Response 401-12

The commenter's concerns/opinions regarding what should be included as part of the MP 2035 will be forwarded to the decision-maker for consideration in taking action on the project.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-13

Michelle Rivera: I think we need a lot more trees along our sidewalks as well as some improvement on the bike lanes we currently have. For example the current bike lanes we have in downtown la are very unsafe considering the bad traffic within the city. Cars don't respect the lanes and don't even see them.

Response 401-13

The BEN was developed to address some of these very concerns. The commenter's concerns/opinions regarding what should be included as part of the MP 2035 will be forwarded to the decision-maker for consideration in taking action on the project.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR.

Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-14

Margaret Healy: Specifically, the bike plan for Westwood Blvd. This is a bad idea because Westwood Blvd is a very congested street, an artery that carries cars, service vehicles, buses, ambulances, fire trucks, etc. toward UCLA and back. I have personally helped with a bike count on Westwood and counted only a handful of bikes but observed a constant stream of the vehicles listed above. The plan calls for the removal of parking on the west side of Westwood where most of the small businesses that serve families (tutoring centers, day care, hair cutting salons, restaurants, are located. These serve the neighborhood and would deprive the community of these amenities).

ECTNP: Please do not overload one small strip of Pico (between Westwood and Sepulveda) with a density burden that the infrastructure cannot support. Specifically,

1.) parking-we already accomodate the parking needs of the small businesses on Pico. There simply will not be sufficient space on our streets for 5 stories of shoppers and renters.

2.) Schools - our local school is overcrowded. Where will the children go who would move into the buildings? People in our community have bought homes so that they could send their children to our local school. An alternative school, which was once suggested in our community, is not a good school.

3.) Traffic: our narrow streets cannot take the extra traffic that would be circulating on our streets.

4.) Proximity to R1: the idea of place 5 stories adjacent to one/two story homes will result in an outrageous imbalance of building size - creating shadows on nearby properties and destroying the single-family character of our community.

If you allow this plan to go forward, you will be creating a magnet for developers to zero in on our few blocks and unfairly ask us to bear the burden of development for Expo.

The current zoning will bring about sufficient development spread out along the whole area - also very near train stations.

I have taken the Expo from Culver City to downtown and have observed mile after mile of areas where there is no development and which would welcome housing and the jobs that development would create. Please incentivize development there.

We have worked hard and been good stewards of our properties. Please do not punish us by throwing all the development on our area. Please maintain the balance in planning we now have. I assure you there will be plenty of development under the current zoning codes. Remember, too, that there is already more than enough ridership for Expo. Thank you.

Response 401-14

See **Master Response 10** for the EIR analysis and conclusion regarding the updated enhanced network designations on Westwood Boulevard with the implementation of MP 2035. The other comments submitted by the commenter appear to be directed towards the Exposition Corridor Transit Neighborhood Plan. The MP 2035 is a separate project that does not include development. Comments regarding the Transit Neighborhood Plan should be directed towards Lameese Chang, at the Department of City Planning.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-15

Jean-Marie Winikates: I am super concerned about the impacts of a new planning constitution. What are the effects of these changes related to education and neighborhood density? We don't need more traffic or few car driving lanes for bikes when we cannot accommodate the density that already exists in the area. We need less population, greater organization and more prosperity far-ranging. WE don't need more high rises of houses and overimpacted schools. We need fewer houses and more people graduating from schools that can create better social welfare in other areas.

Response 401-15

See **Master Response 5** for the EIR analysis and conclusion regarding growth-inducing effects.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-16

Charles Healy: RAZA ----- of Pico Blvd from Westwood to Sepulveda Blvd:

This proposal seriously compromises the functioning of an established neighborhood - directly contradicting one of the alleged intentions of the plan. Creating residences without sufficient parking requirements will overwhelm our already difficult parking problem in the area. The rentals of the 4 and 5 story buildings will be more costly than renters will be able to afford or lack amenities wanted by higher income renters. LA City demographic trends predict more lower income, younger residents with children. Westwood Charter is already oversubscribed and will be hard pressed to accept even the small numbers of children whose parents will be able to afford their rents. There is continuing traffic congestion on Pico, even with elimination of parking during peak hours. It is fantasy to believe new renters will use public transportation for work, leisure, and shopping. Why exasperate current traffic problems? As a resident for 40+ years, I have helped create a desirable community and resent a Texas form dictatory changes to undo a healthy, diverse community.

Response 401-16

See **Master Responses 2 and 3** for the EIR analysis and conclusion regarding community character and loss of parking. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-17

Dylan Smith: I want to express my support for improving bike infrastructure along the Westwood Blvd corridor for too much public space is currently allcoated for street parking at the expense of the safety of the hundres of bicyclists who already use this local connector (Palms to UCLA). If the plan for a cycletrack from the Expo/Westwood light rail station is implemented, the public benefits of decreased traffic and cleaner air and water will greatly exceed the costs in losses of parking. As an "interested but concerned" urban cyclist, I support the installation of cycle tracks throughout the Westside, especially Westwood

Response 401-17

See **Master Response 10** for the EIR analysis and conclusion regarding implementation of the BEN on Westwood Boulevard. The commenter's concerns/opinions regarding Westwood Boulevard will be forwarded to the decision-maker for consideration in taking action on the project. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence

supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-18

Ann Sewill: Plan for a healthy LA and Mobility Plan should reference importance of lower income residents being included in new developments near transit as a GHG reduction strategy

On Expo Neighborhood Transit Plan, and in general, we want to encourage more density where appropriate to get the most use of our new transit opportunities. BUT ONLY IF at least 25% of the new homes are affordable to lower income residents who will take transit more than higher income residents with more cars. Projects must earn higher density and parking reductions by providing affordable units. Especially in the RA4 zone on Pico

Response 401-18

Increasing the availability of affordable housing options with proximity to transit stations and major bus stops is described in MP 2035 policy 5.2 VMT as one strategy that reduces vehicle miles traveled per capita. Policy 2.5.1 of the Housing Element (a General Plan companion document to the MP 2035) references the need to target housing resources, policies and incentives to include affordable housing in residential development, particularly in mixed use development, transit oriented districts and designated Centers.

The proposed project does not include the development of new land uses or changes to zoning. However, the MP 2035 provides a City-wide coherent transportation plan to provide the transportation framework on which to build balanced land use plans. The City undertakes land use planning through its 35 community plans (that are on an approximate 15-year update cycle). Land use plans are generally oriented towards reducing trips and trip lengths by locating uses in proximity to each other and in proximity to known transit. These land use planning efforts would enhance the beneficial effects of the MP 2035.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-19

n/a: You fail to take into consideration the character of the communities. You bombard your ideas/plans on. You think the grass is greener on the other side and fail to see we love our current lifestyle

Response 401-19

See **Master Response 2** for the EIR analysis and conclusion regarding the character of communities. Regardless of the proposed project, the population of the City of Los Angeles is forecast to continue to grow. The transportation infrastructure must adjust to accommodate existing changes in travel and lifestyles. The proposed project is not anticipated to permanently prevent or disrupt access to surrounding land uses, such as businesses located along bicycle routes. The loss or limitation of parking could result in an indirect impact to land uses by reducing the availability of parking for these uses.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-20

Roxane Stern: *Remove preferential parking districts. They favor high income neighborhoods and they 'own' the street. Very undemocratic*

Response 401-20

The commenter's concerns/opinions regarding what should be included as part of the MP 2035 will be forwarded to the decision-maker for consideration in taking action on the project.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-21

Judith Pacht: *Yes: more public transit*

Yes: enhanced bike paths

Limit auto traffic as much as possible

Response 401-21

The commenter's concerns/opinions regarding what should be included as part of the MP 2035 will be forwarded to the decision-maker for consideration in taking action on the project.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-22

Scott Sing: *Love all the cycletracks! A cycletrack or in the very least, a bike lane is essential on Westwood Blvd. for the health and safety of all residents. I support all the bicycle, public transportation network enhancements. All rail lines should intersect Union Station! Pedestrian activated crossing signals should blink RED not yellow.*

Response 401-22

See **Master Response 10** for the EIR analysis and conclusion regarding implementation of the BEN on Westwood Boulevard. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-23

Reilly Myers: *Bike lane on Ohio. This 1.2 treacherous road for both cars and bicycles -- too narrow a street. To avoid the bikes, you have to drive over the stripe lane of the opposite sides become a problem. Nobody wins. What is the alternative*

Response 401-23

Ohio Avenue provides east-west access under the I-405 freeway and provides an alternate route to bicyclists that prefer to avoid traveling on the major adjacent arterials to cross I-405, such as Wilshire Boulevard or

Santa Monica Boulevard. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the enhanced networks.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-24

Marilyn Tusher: We, Westwood Gardens - single family homes are totally against any rezoning or upzoning of our neighborhood - especially along Westwood Blvd from Pico to National and Exposition Blvd from Sepulveda to Westwood.

Help maintain our community as it is -- we represent over 600 single family homes and have been since 1948.

Do not bring in ore development especially Transit Oriented - our community is saturated and cannot accomodate any more.

Fix our streets and sidewalks. no more development or traffic or cars

Response 401-24

The MP 2035 is designed to provide transit mobility that accommodates growth projections as opposed to creating additional growth through rezoning and/or higher density development. The comments submitted by the commenter appear to be directed towards the Exposition Corridor Transit Neighborhood Plan. The MP 2035 is a separate project that does not include development. Comments regarding the Transit Neighborhood Plan should be directed towards Lameese Chang, at the Department of City Planning. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-25

Andy Ikeda: We want sustainable, creative, innovative and sensible development. For example: large developments on Sawtelle bt Santa Monica and Olympic makes sense on a two lane street? Maintain community character.

Response 401-25

The commenter's concerns/opinions regarding what should be included as part of the MP 2035 will be forwarded to the decision-maker for consideration in taking action on the project. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-26

Gregory Wright: Vehicle Idling causes unnecessary air and CO2 emissions, and heaight glare along sidewalks and in parking lots: anti-idling signage is needed.

Vehicle noise pollution-recreational exhaust modifications and after-market devices need to be outlawed and removed via biannual smog inspection prgoram; residents of arterials, pedestrians, transit user all impacted.

Hybrid people st parklets and metro bus stops effective shade structures on bus stops; create priority list of hottest

Bus stops made more visually prominent with dramatic and beautiful public art - e.g. double-image lenticular back panels, on kiosks

much-improved wayfinding signage at all transit nodes to LA venues, services, etc.

More toilet and sink facilities at more transit nodes DASH Connectors need to be much better promoted! – for example, large route-map posters or murals at retail stores on DASH routes

Signs (dynamic or static) informing drivers of (set or current) arterial traffic signal progression speed.

GPS-enabled mobile app for cars warning drivers of approaching intersections and sites of high collision frequency.

LADOT/LA2B and Plan for A Healthy Los Angeles should work with Metro and other agencies to devise, create, and promote Veterinary Dessert MTA bus and LADOT dash routes to enable car-less "veterinary desert" residents to bring their pets to and from veterinaries; HSUS projec this in Boyle Heights.

Response 401-26

See **Response 400-26**.

Comment 401-27

Margaret Shoemaker: My concern is with the possible plan to reduce the car lanes for a bike lane on Terra Bella between Woodman Ave and the I5 freeway. This is a busy thoroughfare to the freeway. To reduce the car lanes on Terra Bella will cause traffic congestion on this already busy thorough fare.

Response 401-27

Terra Bella is not identified on the BEN where a travel lane would be removed for a bicycle lane. See **Master Response 19** for the EIR analysis and conclusion on implementation of the enhanced networks. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-28

Jim Houman: If these plans take place, LA will be a better place to live in. I wanna encourage you to pursue the design for VEN, where lanes can change directions during traffic hours. I lived in a city that they implemented this idea and have confidence it works and improved traffic in LA.

I also am not in favor of buying and selling density shares in high density area. It creates a chopped up physical shape in the city as well as creating a new line of brokers to push for buying the density rights of some properties and devalue them for a long period of time, until a new Density plan comes in place and reevaluates the density differences. However, I think it is not a bad idea to sell the density of public properties in high density zones.

Response 401-28

The comment will be forwarded to the decision-maker for their consideration in taking action on the project. The MP 2035 does not provide for density transfers. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-29

Sarah Ramsawach: *Mobility Element is a plan to manage population explosion and to encourage the continued increase in people.*

Mobility Element is trying to manage the chaos of our undisciplined right to reproduce. We need to look to the end of 2035 and work backwards to today's level of the consequences of overpopulation. This plan expands today's problems, rather than relieving the stresses. This plan promotes increased congestion, accidents and the chaos of confusion.

Response 401-29

See **Master Response 5** for the EIR analysis and conclusion related to growth-inducing effects; **Master Response 1** for the EIR's analysis of traffic impacts. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-30

Penny Meyer: *I want to encourage bike and walk friendly Van Nuys Blvd. Business district needs to be beautiful, clean, safe and well planned. Parking needs mitigating.*

Response 401-30

Van Nuys Boulevard is included on the BEN and TEN for many of the reasons the commenter suggests. The commenter's concerns/opinions regarding the Van Nuys Boulevard Business District will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 3** for the EIR analysis and conclusion regarding parking. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-31

Daniel Rodman: *This plan is great. Please put a cycletrack on Westwood Blvd. This would be a positive traffic mitigation to the West side traffic situation*

Response 401-31

See **Master Response 10** for the EIR analysis and conclusion regarding implementation of the BEN on Westwood Boulevard. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-32

Joseph S.: *I believe that the Mobility Plan represents strong positive steps. I would urge the City to adopt a "Vision Zero" approach to traffic safety. I also have these comments on the TEN:*

- The Mobility Plan represents an opportunity for the City to lay out its ideal scenario for future transit, as well as to reflect resource-constrained reality. This should be the City's pitch for the next Metro LRTP and a possible Measure R2.

- To that end, the City should lay out its proposed visions: a Northern extension of the Crenshaw line to Pico/Rimpau, Wilshire, and perhaps through WeHo to Hollywood; a Valleyto-LAX extension of the Sepulveda

Pass Project; a Purple line extension to Santa Monica; more frequent Metrolink in the North SFV; and perhaps more connections between disadvantaged areas like South LA and employment centers like DTLA and the Westside – a Vermont line from Wilshire south and a Crenshaw-Blue connection along Slauson or Florence.

- Light Rail signal priority is long overdue

Response 401-32

Vision Zero is included as an objective in MP 2035 Chapter 1: Safety First. Policy 3.7 of the MP 2035 describes important regional transit connections such as described by the commenter. The commenter's concerns/opinions regarding what should be included as part of the MP 2035 will be forwarded to the decision-maker for consideration in taking action on the project. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-33

Joseph S.: Regarding the VEN and Freeways:

- For better or for worse, cars are and will remain central to LA mobility. The Mobility Element should, however, emphasize the importance of reducing the negative side-effects - pollution and risk of collisions.

- Again, Vision Zero is an aspirational goal that the City should adopt

- The Mobility Element should set forth a vision for freeway mitigation - aspirational rather than a firm commitment - including cap parks and possible particulate matter mitigation measures.

- Electric Vehicle/Plug In Hybrid Infrastructure will be increasingly important moving forward

- The State recently released a map of pollution impacts weighted by population factors such as poverty. The City should use both the population-factor-weighted and pollutionimpact-only versions of the map to target vehicle pollution mitigation measures toward the neighborhoods that need it most.

Response 401-33

The commenter's concerns/opinions regarding what should be included as part of the MP 2035 will be forwarded to the decision-maker for consideration in taking action on the project. See **Master Response 4** which discusses air quality impacts from the project. As discussed the EIR identified no impacts from the project related to air quality. Therefore, no mitigation measures are required.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-34

Joseph S.: Regarding PEDs:

- More is needed. The entirety of the TEN should be assigned PED (or transition-to-PED) status. Too much of the length of major rail or Rapid Bus (Metro or other providers e.g., BBB on Pico) corridors is non-PED.

Other proposals:

- I would suggest the creation of Transportation Environmental Mitigation Districts for districts particularly impacted by the negative externalities of transportation, particularly pollution. These would provide priority areas for targeting any available mitigation funding.

Scenario 2 of the Transit Enhanced Network provides an adequate number of permanent, dedicated transit facilities to ensure rapid travel at any hour on Santa Monica, Wilshire/7th/Whittier, Venice, Highland, Vermont, and Broadway. Someone in the LA basin who needs to cross town will always be within a mile of a means of rapid transit, no matter how congested car traffic has become, especially with the proposed buildout of the rail lines on the west side.

Response 401-34

The commenter's concerns/opinions regarding what should be included as part of the MP 2035 will be forwarded to the decision-maker for consideration in taking action on the project. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment 401-35

Kenny E.: The San Fernando Valley will eventually need some more improvement in its transit options than is provided here - we can't leave an entire section of the city dependent on the whims of traffic congestion for their travel needs.

Scenario 1 is unacceptable. Peak-hour-only transit lanes will be much harder to enforce than dedicated ones, and will result in major slowdowns for transit riders with only tiny gains for those in cars. Cars cannot continue to provide rapid movement across a polycentric city like Los Angeles. Transit can.

Response 401-35

The commenter's concerns/opinions regarding support for additional transit in the San Fernando Valley and opposition towards Scenario 1 will be forwarded to the decision-maker for consideration in taking action on the project. The RDEIR proposes the following TEN corridors in the San Fernando Valley: Ventura, Sherman, Roscoe, Nordhoff, Osborne, Chatsworth, San Fernando, Reseda, Sepulveda, Van Nuys, and Lankershim. The EIR considers a range of alternatives that balance the needs of the project with the potential effects. See **Master Response 12** for the EIR analysis and conclusion n of alternatives to the proposed project.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

2.4 RESPONSES TO COMMENTS LETTERS RECEIVED ON THE RECIRCULATED DRAFT EIR

LETTER NO. R100

Nareh Nazary
LACMTA Development Review

Comment R100-1

The Transit Enhanced Network (TEN) calls for specific levels of service and hours of operation for various street segments designated for moderate, moderate plus and comprehensive treatment. Please consider incorporating language that explains that transit operators set service levels and hours of operation. Please note that all Metro operated buses are clean CNG fueled buses. It may not be necessary to call this out as a network feature of the TEN. Please continue to coordinate with Metro when planning for bus lanes and similar treatments.

Response R100-1

See **Chapter 3.0 Corrections and Additions** for page 3-8. On page 4.3-26 of **Section 4.3 Air Quality** (2nd sentence under Diesel Emissions heading), language is provided indicating that all Metro buses are fueled by compressed natural gas (CNG). The City of Los Angeles will continue to coordinate with the appropriate transit agencies, including Metro, as the planning and implementation of bus lanes and related treatments continue.

Comment R100-2

This transition may result in less efficient bus operations as slower moving buses may increase travel time for transit dependent persons and negatively impact service levels. While the Transit Enhanced Network might improve bus operations on some streets, it may not be enough to offset conflicting programs on other major streets, like Hollywood Blvd and Sherman Way, which are major transit corridors. Please take this into consideration.

Response R100-2

As described in **Section 4.1 Transportation, Parking and Safety**, the transportation impact analysis accounts for potential vehicular travel delays on certain corridors in the City with the implementation of the enhanced networks and proposes Mitigation Measures **T1** and **T2** to improve traffic flows. The EIR has identified impacts from the project to transportation as significant and unavoidable. A statement of overriding considerations will have to be adopted to approve the project. Additionally, the implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community, including Metro, and the City's leadership. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

Comment R100-3

Metro Service Planning and Countywide Planning collaborated on developing a Bus Bicycle Interface Document that was shared with the City of LA. One of the items of concern was the shared bus bicycle lanes. Based on conducted research, an appropriate width for a shared bus bicycle lane should be at least 16.5 feet. This allows for buses and bicycles to safely pass one another without going into mixed flow traffic. Unfortunately, the accompanying street design manual calls for narrower widths which may compromise safety. Therefore, the City should reconsider the shared lane width standards.

Response R100-3

State law allows bicyclists to ride on City streets whether or not the roadway is designated as a bicycle facility. The *Complete Streets Design Guide: Great Streets for Los Angeles* (Guide) is consistent with current LADOT policy and the *California Manual on Uniform Traffic Control Devices* (CA MUTCD). The guide provides a compilation of design concepts and best practices that promote the major tenets of Complete Streets—safety and accessibility. The Guide is not meant to supersede existing technical standards provided for in other City or national manuals. Rather, it is intended to supplement existing engineering practices and requirements in order to meet the goals of Complete Streets. Due to specific site and operational characteristics associated with any given street, any proposed street improvement project must still undergo a detailed technical analysis by the appropriate city departments. Overall, this Guide hopes to indoctrinate the concept of Complete Streets into Los Angeles’ present and future street design so that all stakeholders are able to plan for, implement, and maintain safe and accessible streets for everyone. See also **Master Response 13** regarding Bicycle Safety. Based on this, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).) The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration.

Comment R100-4

The page 4.1- 45 requires more detail about pedestrian counts.

Response R100-4

Page 4.1-45 includes information on the PEDs. The EIR is a programmatic-level document. Pedestrian counts were not conducted as part of MP 2035 for each of the areas identified as PEDs and are not available at this time. As individual projects are considered, additional data will be collected and project-level impacts will be addressed at that time under a separate undertaking. The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City’s leadership. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. See **Master Response 22** for discussion of the scope/level of analysis for the EIR.

Comment R100-5

In the Draft EIR only four categories are mentioned in the following sentence at page 4.1- 6 “The City has five general categories of roadway classification, including major highway, secondary highway, collector streets, and local streets.”

Response R100-5

See Corrections and Addition for page 4.1-6. Major Highway was combined. It has been separated as Major Highway Class I and Major Highway Class II to list all five categories.

LETTER NO. R101

Juan M. Sarda, P.E.
County of Los Angeles Department of Public Works
Land Development Division, Subdivision Mapping Section,
CUP/CEQA/B&T Planning Unit

Comment R101-1

Thanks for the opportunity to review the re-circulated Draft Environmental Impact Report (DEIR) for the City of Los Angeles Mobility Plan 2035 (MP 2035).

Public Works does not have additional comments on the re-circulated DEIR. However, we would like the opportunity to review the necessary environmental impact reports on a project by project basis for any potential traffic impacts on County roadways and intersections in the area.

If you have any questions regarding the Transportation/Traffic comment above please contact Mr. Andrew Ngumba of Traffic and Lighting Division at (626) 300-4851 or angumba@dpw.lacounty.gov.

Response R101-1

Comment noted. Contact information will be used to solicit input regarding additional project-level environmental review.

LETTER R102

Ali Poosti
Division Manager
Wastewater Engineering Services Division
Los Angeles Bureau of Sanitation

Comment R102-1

This is in response to your February 19, 2015 letter requesting a review of the proposed mobility plan project located throughout the entire City of Los Angeles. The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) has reviewed the request and found the project to be related to guiding mobility decisions in the City through the year 2035 only.

Based on the project description, we have determined the project is unrelated to sewer capacity availability and therefore do not have sufficient detail to offer an analysis at this time. Should the project description change, please continue to send us information so that we may determine if a sewer assessment is required in the future.

If you have any questions, please call Kwasi Berko of my staff at (323) 342-1562.

STORMWATER REQUIREMENTS

The Bureau of Sanitation, Watershed Protection Division (WPD) is charged with the task of ensuring the implementation of the Municipal Stormwater Permit requirements within the City of Los Angeles. We anticipate the following requirements would apply for this project.

POST-CONSTRUCTION MITIGATION REQUIREMENTS

The project requires implementation of stormwater mitigation measures. These requirements are based on the Standard Urban Stormwater Mitigation Plan (SUSMP) and the recently adopted Low Impact Development (LID) requirements. The projects that are subject to SUSMP/LID are required to incorporate measures to mitigate the impact of stormwater runoff. The requirements are outlined in the guidance manual titled "Development Best Management Practices Handbook - Part B: Planning Activities". Current regulations prioritize infiltration, capture/use, and then biofiltration as the preferred stormwater control measures. The relevant documents can be found at: www.lastormwater.org. It is advised that input regarding SUSMP requirements be received in the early phases of the project from WPD's plan-checking staff.

GREEN STREETS

The City is developing a Green Street Initiative that will require projects to implement Green Street elements in the parkway areas between the roadway and sidewalk of the public right-of-way to capture and retain stormwater and urban runoff to mitigate the impact of stormwater runoff and other environmental concerns. The goals of the Green Street elements are to improve the water quality of stormwater runoff, recharge local ground water basins, improve air quality, reduce the heat island effect of street pavement, enhance pedestrian use of sidewalks, and encourage alternate means of transportation. The Green Street elements may include infiltration systems, biofiltration swales, and permeable pavements where stormwater can be easily directed from the streets into the parkways and can be implemented in conjunction with the SUSMP/LID requirements.

CONSTRUCTION REQUIREMENTS

The project is required to implement stormwater control measures during its construction phase. All projects are subject to a set of minimum control measures to lessen the impact of stormwater pollution. In addition for projects that involve construction during the rainy season that is between October 1 and April 15, a Wet Weather Erosion Control Plan is required to be prepared. Also projects that disturb more than one-acre of land

are subject to the California General Construction Stormwater Permit. As part of this requirement a Notice of Intent (NOI) needs to be filed with the State of California and a Storm Water Pollution Prevention Plan (SWPPP) needs to be prepared. The SWPPP must be maintained on-site during the duration of construction.

If there are questions regarding the stormwater requirements, please call Kosta Kaporis at (213) 485-0586, or WPD's plan-checking counter at (213) 482-7066. WPD's plan-checking counter can also be visited at 201 N. Figueroa, 3rd Fl, Station 18.

SOLID RESOURCE REQUIREMENTS

The City has a standard requirement that applies to all proposed residential developments of four or more units or where the addition of floor areas is 25 percent or more, and all other development projects where the addition of floor area is 30 percent or more. Such developments must set aside a recycling area or room for onsite recycling activities. For more details of this requirement, please contact Daniel Hackney of the Special Project Division at (213)485-3684.

Response R102-1

You comment stating that the MP 2035 is unrelated to sewer capacity is noted. Contact information will be used to solicit input regarding additional project-level environmental review regarding the stormwater requirements identified by the commenter, once detailed design regarding individual mobility improvements are known. The project does not propose construction. For subsequent projects to implement the MP 2035, proposed construction will be subject to standard construction conditions, as well as the Stormwater Mitigation Plan (SUSMP/LID requirements), as well as any Green Street elements developed and adopted in the City's Green Street Initiative. Based on this, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).) The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration.

LETTER NO. R200

James O'Sullivan
Fix The City Inc.

Comment R200-1

The EIR lacks objective analysis of mobility issues based on substantial evidence.

This EIR is an advocacy document, not a CEQA-mandated objective analysis of substantial evidence (current and future conditions). Instead of providing analysis of current infrastructure capacity, it assumes infrastructure is adequate and ignores chronic water line breaks, sinkholes, police and fire response time failures, gridlock etc.

Analyzing project EIRs does not excuse the City from analyzing cumulative infrastructure and the impacts of the proposed maps for the safety and mobility of disabled travelers, pedestrians, bus riders, cyclists, trucks, autos and emergency vehicles.

Response R200-1

See **Master Response 1** for the traffic methodology and **Master Response 22** for an explanation of why the scope/level of analysis in the EIR is appropriate. The commenter seeks to link infrastructure and related services to the proposed MP 2035. The MP 2035 aims to create a programmatic approach to the function of city streets and to improve travel efficiency for a variety of modes for years into the future. It is not reasonably foreseeable the proposed mobility improvements for the MP 2035 would affect water lines, sinkholes.

See **Master Response 14** for the EIR analysis and conclusion of emergency response. The EIR determined that a potentially significant and unavoidable impact would occur to emergency access and response times. The MP 2035 is providing the foundation for a network of Complete Streets and establishing new Complete Street standards that will provide safe and efficient transportation for pedestrians (especially for vulnerable users such as children, seniors and the disabled), bicyclists, transit riders, and car and truck drivers. As stated in the January 28, 2014 Los Angeles City Council Motion, "Complete streets take into account the many community needs that streets fulfill. Streets do not just move people from one location to another. They provide a space for people to recreate, exercise, conduct business, engage in community activities, interact with their neighbors, and beautify their surroundings. Complete streets offer safety, comfort, and convenience for all users regardless of age, ability or means of transportation. They also lead to other public benefits, including improved transportation, a cleaner environment, and healthier neighborhoods." The MP 2035 is designed to serve adopted growth levels and, as such, the plan itself is not the direct or indirect impetus to growth. Demands for other services or infrastructure would occur with or without the MP 2035. See RDEIR in Section 6.5 (page 6-13) concluding that the project will have a less than significant impact to public utilities and services, including water and sewer facilities. To the extent that the commenter is arguing that the EIR failed at the programmatic level to analyze impacts by identifying existing citywide infrastructure deficiencies in sewers, waters and other utilities, there is no connection between the project and impacts. See **Master Response 7** discussing impacts from the project to City infrastructure. Such impacts could occur if the project was growth-inducing and would foreseeably result in additional demands to water, sewer and other utility infrastructure. However, the EIR concludes the project is not growth inducing but instead is designed to meet planned and expected growth. (See **Master Response 5**); See also **Comment R102-1** from the City of Los Angeles Bureau of Sanitation finding that the project has no expected impacts to the sewer capacity. To the extent that the commenter is arguing that there would be additional impacts from existing Citywide deficiencies in streets, sidewalks and other mobility infrastructure, any such impacts would be speculative at this point in time. The commenter has not explained how such impacts would occur or what the rationale is when the project is not growth-inducing. But to the extent that the commenter is implying that the project may be putting additional demands on streets and sidewalks with existing deficiencies, it is not reasonably foreseeable that there would be new significant impacts created to traffic or

public safety from the project related to infrastructure that supports mobility. The MP 2035 includes policies for maintenance of right of way infrastructure. Additionally, the City has maintenance programs for streets and sidewalks that can be prioritized for areas that would create significant risk to the public or property. Finally, as future projects are planned with revenue coming available it is reasonably foreseeable any existing deficiencies would be addressed as projects are prioritized. Based on all of the above, it is not reasonably foreseeable at this time that there would be additional impacts, not otherwise identified in the EIR, related to existing deficiencies in the public infrastructure.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. The commenter has provided no evidence supporting a connection between the mobility plan and impacts to City infrastructure. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R200-2

The maps proposed are faith-based (that is, that bike lanes are needed on commercial streets rather than residential streets). CEQA requires data-driven analysis to reach conclusions. Bicyclists represent less than one percent of trips in Los Angeles. Even if bike lanes doubled their numbers, would these riders be safer, and how many bus riders, for example, would be adversely impacted by added delays.

Response R200-2

The EIR does not identify a potentially significant impact on safety as a result of bicycle lanes. See **Master Response 16** on the EIR's analysis of bicycle safety. The EIR does not have to prove that something is "safer" or better than existing conditions, just that it does not create a potential significant environmental impact. See **Master Response 11** for the EIR analysis and conclusion regarding how the MP 2035 and the enhanced networks were developed. The analysis in the EIR is based on a quantitative evaluation of impacts at a programmatic/area level (see also **Master Response 22**). See **Master Response 13** regarding Bicycle Safety. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R200-3

For example, LAFD response time on gridlocked arterials, the EIR relies upon lights and sirens, when in fact there is no room to pull over if lights and sirens are used. Indeed, that is why the City's CEQA Threshold Guide provides guidance in how to address and measure significant adverse impacts of gridlocked streets on emergency response time.

Response R200-3

See **Master Response 14** and Mitigation Measure **T5** for the EIR analysis and conclusion regarding emergency access response times. The EIR determined that a potentially significant and unavoidable impact would occur to emergency access and response times. The City of Los Angeles CEQA Thresholds Guide methodology to evaluate the significance of impacts to emergency response services is based on the analysis of whether a development project would increase demand for emergency services (Section K.2-1 and K.2-4).

New development projects in the City may increase the demand for fire protection and emergency medical services. The LAFD evaluates new project impacts on a project-by-project basis.

Specifically evaluate the need for a new fire station or expansion, relocation, or consolidation of an existing facility to accommodate increased demand.

Because the MP 2035 is not a project-specific development and because the implementation of mobility improvements would not directly increase demand for emergency services, the use of this methodology is not

appropriate for the scope of the project. Instead, at the program level, the potential for the project to impact emergency service is focused on emergency access and the potential for emergency services to be delayed.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R200-4

1. *We request that the EIR be revised again to provide an analysis using current traffic data (not outdated 2008 data) and the City's CEQA Threshold Guide, as well as accident data for every proposed bike lane or bike path.*

Response R200-4

See **Master Response 1** for the traffic methodology. The traffic operations analysis for City roadways was updated to reflect Year 2014 conditions. The updated LOS did not result in any changes to the impacts related to traffic operations (**Impact 4.1-2**) or corresponding Mitigation Measures **T1** and **T2**. Refer to Corrections and Additions for pages 4.1-14, 4.1-15, and 4.1-32 through 4.1-34.

The EIR was conducted in accordance with the City's CEQA threshold guide as outlined in the "Thresholds of Significance" section in each of the EIR technical chapters.

See **Master Response 13** regarding accident data and for the EIR analysis and conclusion of bicycle safety. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R200-5

2. *Please provide diagrams showing all sidewalk dimensions for Beverly Blvd, Fairfax Avenue, Highland Blvd, Hollywood Blvd, LaBrea Avenue, Melrose Avenue, Santa Monica Blvd, San Vicente Blvd, Sunset Blvd, Vine Street, Rossmore Avenue, 3rd Street, 6th Street with an overlay of standard to enhanced sidewalks (10-15 feet wide). What impacts would standard sidewalks have on traffic (auto, bus, bicycle, emergency responders)*

Response R200-5

The EIR is a programmatic-level document. See **Master Response 22** discussing the scope/level of analysis in the EIR. Sidewalk dimensions for each of the requested roadway segments are not available at this time. As individual projects are considered, roadway cross-sections will be provided and project-level impacts will be addressed at that time under a separate undertaking. The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. Typically, additional sidewalk width, to bring the sidewalk up to standard, would be obtained through additional project level dedication and not by narrowing the existing roadway.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R200-6

3. *Please analyze the impact of substandard traffic lanes on both safety (response time, accident rates) and delays for buses, emergency vehicles, autos, pedestrians and bicyclists.*

Response R200-6

The implementation of the MP 2035 would be consistent with the design treatments in the City's Complete Streets Design Guide: Great Streets for Los Angeles. The Complete Streets Design Guide lays out a vision for designing safe, accessible and vibrant streets in Los Angeles. As outlined in California's Complete Streets Act of 2008 (AB 1358), the goal of Complete Streets is to ensure that the safety and convenience of all transportation users – pedestrians, bicyclists, transit riders, and private motorists – is accommodated. The Complete Streets Design Guide provides a compilation of design concepts and best practices that promote the major tenets of Complete Streets—safety and accessibility. The Guide is not meant to supersede existing technical standards provided for in other City or national manuals. Rather, it is meant to supplement existing engineering practices and requirements in order to meet the goals of Complete Streets. Due to specific site and operational characteristics associated with any given street, any proposed street improvement project must still undergo a detailed technical analysis by the appropriate city departments. Specific design guidance that is in a demonstration phase, and has yet to be incorporated into the California Manual on Uniform Traffic Control Devices (CA MUTCD), will require provisional approval from the appropriate City departments. Overall, this Guide hopes to indoctrinate the concept of Complete Streets into Los Angeles' present and future street design so that all stakeholders are able to plan for, implement, and maintain safe and accessible streets for everyone.

The EIR is a programmatic-level document. See **Master Response 22** on the scope/level of analysis in the EIR. Roadway lane widths are not available at this time. As individual projects are considered, roadway cross-sections will be provided and project-level impacts will be addressed at that time under a separate undertaking. The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership. See also **Master Responses 14** and **19** for the EIR analysis and conclusion on emergency vehicles and response times and the implementation of the MP 2035. The EIR determined that a potentially significant and unavoidable impact would occur to emergency access and response times. See **Master Response 1** for the assessment methodology of transportation impacts from the project.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R200-7

4. *The EIR fails to provide an analysis of the increased greenhouse gas emissions due to delays of the significant number of buses on current and proposed Transit routes.*

Response R200-7

According to the California Department of Transportation Standard Environmental Reference, global climate change and GHG emissions are a cumulative impact.⁴⁹ An individual project does not generate enough GHG emissions to significantly influence global climate change. The MP 2035 is designed to improve mobility throughout the City. Therefore, changes in GHG emissions are assessed regionally using vehicle miles traveled (VMT) by Area Planning Commission and combined for the City. This methodology is consistent with the

⁴⁹California Department of Transportation, *Environmental Impact Report/Environmental Impact Statement Annotated Outline*, August 2013.

methodologies used by the CARB to compile to estimate the mobile source GHG emissions inventory and by the SCAG to estimate regional GHG emissions in the 2012-2035 RTP/SCS.^{50,51} Similar to the proposed project, these documents assessed mobile source GHG emissions using an estimate of regional VMT. There are specific locations within the City (e.g., Westwood Boulevard) where traffic congestion may increase due to project elements, such as bicycle lanes. However, as global climate change and GHG emissions are a regional issue, emissions associated with the MP 2035 are not addressed on a local scale, and are instead analyzed a regional level, consistent with the programmatic analysis contained in the EIR.

Regarding buses, GHG emissions were estimated based on a VMT that accounted for all vehicle classes and fuel types. Emissions rates were from the CARB's EMFAC2014 model. Using EMFAC2014, emissions were estimated for VMT in five mile per hour increments from 0 to 65+ miles per hour. A weighted emission factor was used that accounted for differing emissions by vehicle class. Therefore, bus emissions were included in the regional GHG analysis.

Regional VMT was estimated using an updated version of the City of Los Angeles' Travel Demand Model. The model developed for MP 2035 is based on the Transportation Specific Plan (TSP) model, which utilizes the TransCAD Version 4.8 Build 500 modeling software and has been calibrated and validated for current conditions (most recently updated to 2014). The model-estimated changes in circulation system conditions are conservative, vehicle-centric estimates based on historical travel behavior patterns and do not account for changes in demographics, vehicle ownership patterns, energy prices, and migration to alternate modes (pedestrian, bicycle and transit) that would lead to decreasing vehicular volumes. Transportation demand models are largely dependent on historical travel patterns and mode choices when forecasting future traffic projections. Recent research in this area suggests that factors correlated with annual VMT over the last 60 years include the economy, demographics, technology, and the urban form of the built environment. Specifically, this research shows both cyclical recession effects and a structural leveling of the economy and travel. Refer to **Section 4.1 Transportation, Parking and Safety** for a detailed discussion related to the methodology for estimating VMT.

In addition, proposed new routes would increase regional bus ridership and decrease passenger vehicle VMT. This would result in a regional reduction in VMT and associated GHG emissions.

The results of the GHG analysis are shown in **Table 4-4** on page 4.4-10 of the Draft EIR. Although it is estimated that regional growth would result in increased regional VMT, the implementation of the GHG engine emission standards known as the Pavley Rules, adopted in 2002 as Assembly Bill 1493 and first implemented in 2009, would substantially reduce tailpipe GHG emissions between now and 2035. When freeway emissions are combined with surface street emissions to represent regional emissions, the analysis indicates that GHG emissions under Future With Project conditions would be 7 million metric tons per year less than under Existing conditions (38 percent reduction). GHG emissions under Future With Project conditions would be reduced by 22 thousand metric tons per year less than under Future No Project conditions (<1 percent reduction). Therefore, the proposed project is anticipated to decrease GHG emissions.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R200-8

5. *Please revise the EIR to provide an objective analysis of the delays of buses due to adding a signal phase for bicycles at each intersection, where there are both BEN and TEN networks. (Beverly Blvd, Fairfax Ave., Hollywood Blvd, LaBrea Ave, Santa Monica Blvd, 3rd Street)*

⁵⁰California Air Resources Board, *First Update to the Climate Change Scoping Plan*, May 2014.

⁵¹Southern California Association of Governments, *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy*, September 11, 2014.

Response R200-8

The traffic analysis for the project did not perform an intersection-level of analysis. The MP 2035 EIR is a programmatic document that addresses traffic impacts at an area level based on preliminary conceptual level information. As stated in Chapter 1.0 Introduction and **Section 4.1 Transportation, Parking, and Safety** of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles' Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions. As projects are designed more detailed analysis will be undertaken, but such analysis is not possible at this time since design details are not available. See **Master Response 1** regarding the traffic impact analysis methodology. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. Of the streets cited in the comment only Hollywood Boulevard is included on both the BEN and the TEN. At the time the street is prioritized for improvements additional analysis would be undertaken. At the programmatic level, safety analyses could only be conducted after site-specific road treatments are known as design becomes available in the future. See **Master Response 22** for an explanation of why the scope/level of analysis in the EIR is appropriate.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R200-9

8. *Please conduct an analysis of accident frequency of roadways with and without bike lanes. There is an assumption throughout the EIR (unsupported by substantial evidence) that a bike lane would make all BEN's safer.*

Response R200-9

The EIR does not identify a potentially significant impact on safety as a result of bicycle lanes. The EIR does not have to prove that something is "safer" or better than existing conditions, just that it does not create a potential significant environmental impact. **Section 4.1, Transportation, Parking and Safety**, of the EIR has cites to numerous studies regarding the safety of bicyclists in the context of transportation infrastructure. **Master Response 13** provides additional detail on bicycle safety and **Master Response 22** provides an explanation of why the scope/level of analysis in the EIR is appropriate. .

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R200-10

9. *There appears to be an assumption that a straight line is the safest route, when in fact, local residential streets, which are far less congested, may turn out to be far safer. Please provide a safety analysis of the two alternatives regarding cycling safety.*

The tradeoff may be between speed and safety, not just for bikers, but for bus riders and emergency responders. Please provide an objective analysis that compares safety, cycling speed and how adverse impacts might be mitigated and funded. It makes unsubstantiated assumptions that bike lanes will improve the safety and mobility of bicyclists and traffic as a whole. There is no evidence to support this conclusion. The EIR also fails to analyze the impacts of proposals in this EIR on pedestrians, the business community, bus-riders and disabled commuters, and public safety.

Response R200-10

The EIR does not identify a potentially significant impact on safety as a result of bicycle lanes. The EIR does not have to prove that something is “safer” or better than existing conditions, just that it does not create a potential significant environmental impact. The MP 2035 includes a comprehensive system of local residential roadways (the NEN), as part of the package of treatment options. **Master Response 20** provides information for the EIR analysis and conclusion on the NEN. See **Master Response 22** for an explanation of why the scope/level of analysis in the EIR is appropriate. Without knowledge of the specific design treatments, a safety analysis comparing local residential streets to other roadways with bicycle facilities cannot be completed. The EIR is a programmatic-level document and detailed design treatments are not available at this time. As individual projects are considered, project-level impacts will be addressed at that time. The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City’s leadership. See **Master Responses 1** and **19** for the EIR analysis and conclusion on the traffic impact methodology and implementation of the MP 2035. **Master Response 2** discusses the EIR analysis and conclusion of potential impacts to businesses, community character and quality of life. **Master Response 13** provides information for the EIR analysis and conclusion on bicycle safety.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R200-11

Substandard Sidewalks Ignored

For example, the EIR advocates standard or above-standard sidewalks, but it did not provide an inventory of sidewalk dimensions and the impacts of recommendations on those sidewalks. It does admit that pedestrians represent 14 percent of all trips, while bicyclists represent 1 percent of all trips. In effect, the proposals adopt a one step forward, two steps backward approach to improving mobility and safety. There is a disconnect between rhetoric and reality that an EIR is required to address.

This EIR fails to provide the objective analysis to test the validity of the claims made by the City.

In some cases sidewalks in the City are as narrow as four feet, in some locations, far from standard dimensions. The first priority of a mobility element would be to upgrade those sidewalks. But there is no discussion or analysis of upgrading sidewalks, the impact on traffic and parking and bike lanes of such upgrades, etc.

Response R200-11

The EIR is a programmatic-level document. An inventory of all sidewalk dimensions in the City is not available at this time. As individual projects are considered, roadway cross-sections will be provided and project-level impacts will be addressed. The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City’s leadership. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035 and **Master Response 22** for an explanation of why the scope/level of analysis in the EIR is appropriate. On April 1, 2015, the City of Los Angeles pledged to spend more than \$1.3 billion over the next three decades to fix the backlog of broken sidewalks and make other improvements to help those with disabilities navigate the city. The proposed agreement would resolve a lawsuit filed by attorneys for the disabled, who argued that crumbling, impassable sidewalks and other barriers prevented people in wheelchairs or others with mobility impairments from accessing public pathways in violation of the Americans With Disabilities Act. (The final terms must still be approved by a federal judge.) The MP 2035 has Program MT.7, Sidewalk Repair regarding the implementation of sidewalk improvements throughout the City.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R200-12

Emergency Response Time Impacts from Substandard Roadway Configurations Are Required to be Analyzed in this EIR.

This EIR is a programmatic EIR. As such, it is required to provide a citywide analysis based on current data and projected cumulative data. Instead, the EIR illegally postpones this analysis for project-specific EIRs. No doubt, some of those EIRs will claim that the program EIR provided the required analysis and permits the projects without any in-depth analysis. The most glaring omission from this EIR is the failure to analyze and mitigate emergency response time under current conditions, and what proposed changes would do that already inadequate but unmitigated environmental impact.

Response R200-12

The implementation of MP 2035 would be consistent with the design treatments in the City's Complete Streets Design Guide: Great Streets for Los Angeles. See **Response R200-6** for additional information on the City's Complete Streets Design Guide.

The EIR is a programmatic-level document. Roadway lane widths are not available at this time. As individual projects are considered, roadway cross-sections will be provided and project-level impacts will be addressed at that time under a separate undertaking. The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035 and **Master Response 22** for an explanation of why the scope/level of analysis in the EIR is appropriate. See **Master Response 14** for the EIR analysis and conclusion on emergency access and response times. The EIR determined that a potentially significant and unavoidable impact would occur to emergency access and response times.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R200-13

The inadequacy of emergency response time is a fundamental public safety problem that under CEQA, cannot be ignored. City CEQA Threshold Guidelines provide for measurement of fire response time. We request that the City Planning Department follow its own CEQA Guidelines and conduct the mandatory analysis of emergency response time, infrastructure adequacy, and if there is no feasible mitigation, then be honest with the City Council and the public by issuing a Statement of Overriding Considerations.

For example, the EIR proposes to rely on lights and sirens to permit emergency responders to reach their destinations. Unfortunately, there is no analytical bridge between current gridlock and the efficacy of lights and sirens for a gridlocked area in which there is no space to pull over and yield.

Response R200-13

The EIR evaluates potential impacts to emergency access vehicles and finds the impact to be potentially significant. LAFD has a mandate to protect public safety and must respond to changing circumstances and, therefore, acts to maintain response times. The proposed project, together with cumulative growth, would increase congestion, which could impede emergency access. In addition, increased development would

likely increase calls for service. Because CEQA requires comparison to existing conditions, and a number of factors will contribute to the need for new LAFD facilities, including project actions, and because it is not possible to foresee all potential stressors to the fire protection system to which the project would contribute, in the interests of being conservative, even with implementation of Mitigation Measure **T5**, emergency response impacts are considered potentially significant and unavoidable. As such, the City of Los Angeles will be required to adopt a Statement of Overriding Considerations that details why the benefits of the proposed project outweigh the unavoidable significant impacts. Under CEQA, this statement is required prior to approval of the proposed project. **Master Response 14** provides a discussion on emergency vehicle access and response times.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R200-14

CEQA does not permit the City to turn a blind eye to current conditions and just hope for the best. Neither does state law, which mandates that the General Plan be internally consistent and not allow runaway development without adequate infrastructure. The irony in this situation is that the bike lane maps are proposed to improve safety, without substantial evidence to support that claim.

CEQA does not permit non-disclosure and analysis of how inadequate city services are by postponing analysis until later, through a project EIR. There is no analysis in this EIR to determine the adverse impacts on pedestrian safety, bus rider service time, and disabled access to mass transit.

Response R200-14

As stated in **Chapter 1.0 Introduction** and **Section 4.1 Transportation, Parking and Safety** of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles' Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions. The project description does not include detail on the phasing or specific timing of individual projects because it is unknown. As individual projects are considered, project-level impacts will be addressed. See **Master Response 1** regarding the traffic impact analysis methodology. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. **Master Response 13** provides information for the EIR analysis and conclusion on bicycle safety. **Master Response 24** provides information for the EIR analysis and conclusion on pedestrian safety.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R200-15

This EIR is rife with speculative conclusions about emergency response time, a vital public safety issue throughout the city, the impact of gridlock on emergency response time (e.g., suggestions that cars yield to emergency vehicles is nonsensical in areas of the city where the LOS is E or F and there is no open area to pull over and wait. An EIR is required to provide analysis of current baseline traffic and projected cumulative impacts. No such analysis was provided, and subsequent project EIRs are not sufficient to make this EIR adequate. These are cumulative impacts related to a program EIR. Mitigation must be provided in this EIR and not wait for project EIRs.

Lights and sirens cannot mitigate the lack of adequate staffing, facilities and equipment; lights and sirens are ineffective when there is gridlock as defined as LOS F and no space to yield.

Response R200-15

As discussed in **Master Response 1**, the EIR analyzed project impacts against existing conditions as required by CEQA. Additionally, the traffic analysis considered cumulative impacts. The MP 2035 EIR is programmatic in nature and therefore presents quantitative and qualitative analyses. The EIR identifies a potentially significant and unavoidable impact to emergency services and a Statement of Overriding Considerations will be prepared in conjunction with the required Findings of Fact for the proposed project. **Master Response 14** provides the EIR analysis and conclusion on emergency vehicle access and response times. See also **Response R200-13**.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R200-16

A Statement of Overriding Considerations Is Required for Substandard LAFD Response Time.

This EIR must provide a statement of overriding considerations regarding the current inability of the city to mitigate inadequate public safety response time as defined by the city as meeting the standard of under five (5) minutes 90% of the time. Substantial evidence has already been submitted for this EIR that shows that the City Controller found in a May 18, 2012 audit of LAFD that it failed to meet the standard response time; and on June 28, 2013, the Los Angeles County Grand Jury published a report documenting inadequate response time and deaths attributed to inadequate LAFD response time.

The EIR does not analyze the impact on emergency response time of narrowing traffic lanes or parking lanes to create a bike lane. There is no substantial evidence of how substandard traffic or parking lanes impact large fire emergency vehicles ability to reach accidents and fires and the mix of large buses and cars on substandard lanes?

Response R200-16

See **Master Response 14** for the EIR analysis and conclusion of emergency response times. The EIR identifies a potentially significant and unavoidable impact to emergency services and a Statement of Overriding Considerations will be prepared in conjunction with the required Findings of Fact for the proposed project. The proposed lane widths included in the Complete Streets Design Guide are consistent with current Department of Transportation policy and the California Manual on Uniform Traffic Control Devices.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R200-17

Substandard sidewalks in many parts of the City do not allow for wheelchair turning radius.

Many City sidewalks are substandard. In addition to impacting the disabled, these narrow sidewalks make it a challenge for baby-strollers to negotiate the tight space, and lack space to park bicycles.

Please provide an analysis of safe, standard-to larger sidewalks on the mobility of disabled persons and on pedestrian movement and safety. The EIR does not address the space needs of handicapped travelers.

Please provide an analysis of current dimensions and proposed dimensions on disabled bus, auto and local users of all streets noted as BEN and TEN.

The EIR is silent with regard to all of these serious and significant adverse environmental impacts in the name of less than 1% of the commuters in the city. The rights of pedestrians to a safe environment, the rights of the handicapped, and the ability of bus riders to get to work and school on time are all left up for grabs by an entitled 1 percent of commuters sharing Boulevards and Avenues. The EIR is required to analyze the impacts of proposed bikeways and bike lanes on the 99% who share the road.

Response R200-17

See **Master Response 24** regarding safety for pedestrians and other vulnerable populations. The implementation of the MP 2035 would be consistent with the design treatments in the City's Complete Streets Design Guide: Great Streets for Los Angeles. The guide contains roadway design features, such as sidewalk dimensions, for each roadway designation. See **Response R200-6** for additional information on the City's Complete Streets Design Guide.

The MP 2035 is providing the foundation for a network of Complete Streets and establishing new Complete Street standards that will provide safe and efficient transportation for pedestrians (**especially for vulnerable users such as children, seniors and the disabled**), bicyclists, transit riders, and car and truck drivers. As stated in the January 28, 2014 Los Angeles City Council Motion, "Complete streets take into account the many community needs that streets fulfill. Streets do not just move people from one location to another. They provide a space for people to recreate, exercise, conduct business, engage in community activities, interact with their neighbors, and beautify their surroundings. Complete streets offer safety, comfort, and convenience for all users regardless of age, ability or means of transportation. They also lead to other public benefits, including improved transportation, a cleaner environment, and healthier neighborhoods."

The MP 2035 responds to changing demographics, a younger population desirous of safe and accessible active transportation options (bike, walk), a growing number of residents and employees seeking alternatives to the car, and an aging population that may need to rely more and more on transportation alternatives to the automobile. In 2030, senior citizens will make up one fifth of Los Angeles County's population. This older population (as well as children and the disabled) will benefit from longer pedestrian crossing times, shorter street crossing distances, wider, shaded sidewalks, street benches, and separated bicycle facilities. Ultimately, there is nothing in the project that is expected to significantly reduce or impede pedestrians, including but not limited to the disabled, those with strollers, and bus riders, as described by the commenter and the commenter has provided no substantial evidence that supports the conclusion in the comments. The City is required to comply with ADA standards in all new construction of streets and sidewalks.

As stated in **Chapter 1.0 Introduction** and **Section 4.1 Transportation, Parking and Safety** of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles' Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions. See **Master Response 1** for the traffic impact analysis methodology. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R200-18

No analysis has been conducted of the emergency access impacts of narrowing traffic and parking lanes. The EIR fails to analyze the impacts of bike lanes on pedestrian safety, handicapped bus rider on- and off-loading, and adverse impacts on bus service efficiency due to added signalization phases at intersections to accommodate bikers. Also pedestrian safety is often compromised by bike riders who use sidewalks.

Response R200-18

See **Master Response 24** regarding safety for pedestrians and other vulnerable populations. **Master Response 14** provides a discussion on emergency vehicle access and response times (see also **Responses R200-13**). In addition, the EIR identifies a potentially significant and unavoidable impact to emergency services and a Statement of Overriding Considerations will be prepared in conjunction with the required Findings of Fact for the proposed project. See **Master Response 1** for the EIR traffic impact analysis methodology. The implementation of bicycle facilities associated with the MP 2035 is anticipated to improve safety and health outcomes for bicyclists and other road users. See **Master Response 13** for the EIR analysis and conclusion on safety.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R200-19

The EIR must provide substantial evidence that bike paths and bike lanes are safer than existing conditions. There is no evidence in this EIR to support this conclusion.

Response R200-19

The EIR does not identify a potentially significant impact on safety as a result of bicycle lanes. The EIR does not have to prove that something is “safer” or better than existing conditions, just that it does not create a potential significant environmental impact. The implementation of bicycle facilities associated with the MP 2035 is anticipated to improve safety and health outcomes for bicyclists and other road users. **Master Response 13** provides the EIR analysis and conclusion on bicycle safety and references to studies that demonstrate improved safety. See **Master Response 22** for an explanation of why the scope/level of analysis in the EIR is appropriate.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. R201

Susan Grossman
Hancock Park Homeowners Association

Comment R201-1

In this plan the City proposes to add a dedicated bus lane and bicycle lane on Wilshire Boulevard, a peak hour bus lane and a bicycle lane on Beverly Boulevard, protected bicycle lanes on Melrose Avenue, bicycle lanes on Rossmore Avenue and Highland Avenue, in addition to increasing bus service on 3rd Street. Traffic on these streets is already at capacity during most hours of the day and these proposals will only exacerbate congestion, air pollution and cut-through traffic in our residential neighborhood.

Response R201-1

The bus lane on Wilshire Boulevard is a Metro project that was under design and construction during the preparation of the MP 2035 EIR; it was recently opened in April 2015 and is reflected in the future conditions analysis completed for the MP 2035. As stated in **Chapter 1.0 Introduction** and **Section 4.1 Transportation, Parking and Safety** of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles' Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions (as documented in **Appendix C**). See **Master Response 1** for the EIR traffic impact analysis methodology. See **Master Response 18** for the EIR analysis and conclusion on the potential cut-through traffic.

Exposure to air pollution from reduced capacity and increased congestion is discussed on page 4.3-25 of the Draft EIR. 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 (Although in some cases where capacity is reduced, the number of vehicles passing through an intersection during peak hours could decrease, which could lead to peak period being extended). Increased 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 project 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. The MP 2035 would not induce growth and project growth and associated traffic is already accounted in the Transportation Demand Model. Cumulative impacts are discussed in **Section 6.1** of the RDEIR. The MP 2035 would result in significant and unavoidable impacts after mitigation to traffic congestion, emergency access, and operational noise associated with bus traffic. These impacts would be cumulatively considerable when combined with impacts from City projections regarding growth, land use and growth.

Existing ambient CO levels are extremely low within the South Coast Air Basin. 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. The one-hour concentration is typically 3 ppm and the 8-hour concentration is typically 2 ppm according to monitoring data. The State and federal 1-hour standards are 20 and 35 ppm, respectively. The State and federal 1-hour standards are 9.0 and 9 ppm, respectively. No CO standard has been exceeded in the Basin since 2002. The Basin is designated as a maintenance area for CO which means both State and federal air quality standards are satisfied.

To trigger an impact, CO 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 in over an 8-hour period. Because of the low ambient CO condition, even where speed on average street segments could be reduced to almost zero, the resulting CO emissions would only increase by a factor of two. In addition, none of the intersections affected by MP 2035 contain the requisite vehicle volumes and delays to generate a CO hotspot. Under the

most extreme circumstances, 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.

This conclusion was demonstrated through a localized pollutant concentration analysis for a City street with a volume approaching 35,000 vehicles per day (La Brea Avenue between Beverly Boulevard and 6th Street. This localized pollutant concentration analysis can be reasonably extrapolated to apply to other intersections throughout the City. The analysis was completed using the CARB CALINE4 model and assuming that peak hour traffic is commonly ten percent of average daily traffic. The highest hourly delay at this intersection was assumed to be 215 seconds per vehicle during the AM peak hour (based on modeling performed for a bicycle lane). It was assumed that these vehicles would travel five miles per hour during the delay period creating a constant 0.3-mile emissions source. The results show that the significantly increased delay at the already congested Westwood/Santa Monica Boulevard intersection would not cause an exceedance of the applicable standards. CALINE4 does not model ozone concentrations. Ozone is not directly emitted by vehicles. Ozone is formed by a complex chemical reaction involving nitrogen oxides and volatile organic compounds, which are directly emitted by vehicles. As a result, the SCAQMD has established significance thresholds for nitrogen oxides and volatile organic compounds but not for ozone. NO₂ is a precursor to O₃ and NO₂ concentrations show the potential for increased localized ozone concentrations. In addition, CALINE4 presents PM emissions in parts per million which cannot be compared to the State standards listed in micrograms per cubic meter. The CO and NO₂ concentrations are well below the standards and local roadways are mostly traveled by gasoline powered vehicles. These vehicles emit less particulate matter than diesel powered vehicles. In addition, particulate matter generated by tire wear would not increase because traffic volumes would not increase. Similar to the modeled pollutants, it is not anticipated that particulate matter emissions would be significant.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R201-2

After reading the Draft Environmental Impact Report we are astounded and dismayed at the proposals and how they will impact our neighborhood. The Mitigations offered by the DEIR (In Table 2-1) are: "LADOT will monitor on streets that are identified upon a request submitted by the Council Office to determine if traffic diversion occurs. Generally, this plan implements bicycle lanes and increased traffic levels on our major streets without any compensating actions to prevent further spill-over into our community.

Response R201-2

Section 4.1 Transportation, Parking and Safety of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles' Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions. See **Master Response 18** for the EIR analysis and conclusion on the potential cut-through traffic and **Master Response 19** for a discussion of future projects and the requirements for environmental review.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R201-3

If traffic on residential streets is found to be significantly impacted, in accordance with LADOT's Traffic Study Policies and procedures, LADOT will work with neighborhood residents to identify and implement appropriate traffic calming measures." This is basically no mitigation at all. The City is slow, at best, and unresponsive at worst, to admitted traffic and safety issues. Rarely are traffic mitigation efforts implemented in a reasonable

time, and it often takes years of long and intense efforts by residents to get attention. The proposed Mitigations in this plan for dealing with Traffic Incursion are just business as usual and are woefully inadequate.

Response R201-3

Section 4.1 Transportation, Parking and Safety of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles' Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions. See **Master Response 1** for the EIR analysis and conclusion regarding the traffic impact assessment methodology and **Master Response 18** for the EIR analysis and conclusion on the potential cut-through traffic. **Master Response 19** for a discussion of future projects and the requirements for environmental review. The EIR recognizes that Mitigation Measure **T3** will not mitigate the impact to less than significant. The City has not identified any feasible mitigation measures at this time under the current level of analysis available to mitigate the potential impact from potential cut-through traffic. See **Master Responses 1** and **22** for the EIR traffic analysis methodology and conclusion and the EIR scope/level of analysis.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R201-4

The DEIR also basically dismisses concerns over loss of parking spaces. The proposal to add a Protected Bicycle Lane on Melrose will eliminate a large number of street parking spaces. Our neighborhood streets are already filled with parked cars to the point where many blocks have instituted permit parking. Where are these additional cars supposed to go? The mitigation measures provided for in the DEIR are again useless: "The City will consult with property owners to determine alternative parking spaces." After years of attempting to work with the operators of the Mozza restaurants, our streets are still filled with their employees' and customers' cars, showing that the City's consultation with property owners results in no action on parking problems.

Response R201-4

See **Master Response 1** for the traffic impact assessment methodology and **Master Response 13** for the EIR analysis and conclusion regarding the loss of on-street parking. The social inconvenience of parking deficits, such as residents having to look for scarce parking spaces, is not an environmental impact, but a secondary physical effect. Scarcity of parking that results in the displacement of businesses, such that the area deteriorates and leads to economic blight would be a significant and unavoidable land use impact. Mitigation Measure **LU1** in **Section 4.2 Land Use and Development** (page 4.2-31) requires that the City shall identify parking replacement options to businesses that do not have off-street parking and would be substantially affected by the permanent removal of on-street parking.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R201-5

One of the goals of the plan is to improve air quality and reduce greenhouse gas emissions. The proposed plan will have exactly the opposite effect. Traffic at peak hours now barely moves in the neighborhood. Eliminating vehicular traffic lanes will necessarily create gridlock.

Response R201-5

Regional air quality emissions are discussed on page 4.3-19 of the Draft EIR. Emissions were estimated using the VMT presented above and the EMFAC2014 model. **Table 4.3-12** presents mass emissions for each scenario and APC, and **Table 4.3-13** presents emission comparisons between scenarios. This impact

analysis is based on the CEQA requirement that impacts be compared to existing conditions. The comparison between future conditions is presented for information. As compared against Existing conditions, criteria pollutants would be emitted at substantially higher levels under current policies as compared to Future with Project conditions.

Although traffic volumes would be higher in Future with Project conditions, pollutants emissions from mobile sources are expected to be much lower due to technological advances in vehicle emissions systems combined with normal turnover in the vehicle fleet and new emission standards. Future with Project emissions would be less than Existing emissions (echoing reductions in VMT), and would not exceed the SCAQMD significance thresholds. Therefore, the proposed project would result in a less-than-significant impact related to regional emissions.

Chapter 5.0 Alternatives provides a discussion of the air quality emissions for the different alternatives considered. Alternative 1 (No Project) could conflict with the AQMP because it does not support policies designed to reduce VMT and emissions. The proposed project and Alternatives 2, 3, 4, 5 would have potentially significant impacts related to construction emissions. Mitigation Measures provided in **Section 4.3 Air Quality** would reduce these effects to less than significant. The proposed project and Alternative 5 would have the greatest VMT reductions which could correspond to fewer criteria pollutant emissions.

The Future With Project to Future No Project comparison is presented for informational purposes (existing conditions are the baseline for the air quality analysis). Based on the vehicle-centric traffic modeling, Future With Project emissions when compared to Future No Project emissions would decrease for CO, PM_{2.5}, and PM₁₀ but increase for VOC (1.6 percent) and NO_x (2.6 percent). The traffic model developed for the MP 2035 has a margin of error of approximately 5 to 15 percent. The increased emissions of VOC and NO_x between Future with Project and Future No Project conditions is, therefore, not substantial given 1) the small difference, 2) the vehicle-centric nature of the analysis, 3) the error margin of the model, and 4) the baseline for the air quality analysis being existing conditions. Therefore, the difference between Future With Project and Future No Project emissions would not be considerable.

See **Response R201-1** regarding localized exposure from reduced capacity.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R201-6

Finally, we are disturbed that no Congestion Management Plan (CMP) has been done. We find it difficult to understand how the removal of traffic lanes, the addition of bicycle lanes, and the elimination of off peak hour parking on our streets can be claimed to not result in a land use change.

Response R201-6

The MP 2035 is not proposing any land use changes in the City. In accordance with Section 15125.2(d) of the CEQA Guidelines, the growth-inducing impacts of the MP 2035 are considered in EIR **Section 6.3 Growth-Inducing**. As indicated on page 4.1-19 on the RDEIR, “Since MP 2035 is not resulting in land use changes within the City of Los Angeles, the CMP analysis is not required. However, for the purposes of showing changes in travel demand on the state highway system within the City, the CMP analysis was conducted for the CMP freeway segments.” See **Master Response 2** for the EIR analysis and conclusion regarding potential impacts to Community Character and Quality of Life; the EIR does not say that there will be no impact to land use, just that the impacts will not be so significant that it will result in a physical environmental impact such as blight. See **Master Response 5** for the EIR analysis and conclusion regarding the potential growth-inducing effects of the proposed project. A CMP analysis was conducted for all freeway monitoring stations in the City for the purposes of showing changes in travel demand on the state

highway system. See **Master Response 1** for the traffic impact methodology and **Master Response 22** for the scope/level of analysis in the EIR.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R201-7

The five proposed alternatives, Section 5.0, are completely inadequate. Neither the proposal nor the alternatives provide for any protection of neighborhoods. We ask that the City start again, do a CMP and be serious about including real, timely and effective mitigation avenues for residents. These processes should be in place and working before any changes to area streets are made.

Response R201-7

Master Response 12 provides a discussion on project alternatives. See **Master Response 22** for an explanation of why the scope/level of analysis in the EIR is appropriate and **Master Response 19** for a discussion of future projects and the requirements for environmental review. See **Response R201-6** regarding the CMP analysis and impacts to land use.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R201-8

Our Association also opposes the addition of bike lights or any other features that facilitate high speed and dangerous commuter bike traffic on our neighborhood streets. While not covered in the DEIR, the LADOT and our Council Office has been attempting to install these features on 4th Street.

Response R201-8

Fourth Street in the Hancock Park area is not proposed as part of the BEN or NEN in the MP 2035. The implementation of the Enhanced Networks (TEN, BEN, NEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific treatments, such as lighting, would be determined only after further study and discussion with the community and the City's leadership. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035 and see **Master Response 22** for an explanation of why the scope/level of analysis in the EIR is appropriate.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R201-9

Thank you for your attention and we look forward to working constructively with the City in coming up with adequate processes to improve traffic flow, encourage bicyclists and limit the negative impact of increased density on our neighborhoods.

Response R201-9

The City will continue to solicit public input throughout the planning and implementation process for the proposed project.

LETTER NO. R202

Jim Van Dusen
Hollywoodland Homeowners Association

Comment R202-1

The Hollywoodland Homeowners Association requests that Hollywood be exempt from the 2035 Mobility Plan as the City is in the process of revising the Hollywood Community Plan (HCP) per the Court's orders. The HCP will direct all development in the Hollywood area and will significantly impact any mobility plans for Hollywood.

The combination of new bike lanes and decreased vehicular lanes in the Hollywood area could cause a significant increase of traffic in the Hollywood Hills as vehicles try and work their way around what could be vehicular gridlock in Hollywood caused by the decrease of vehicular lanes. Specifically, the concern is from Barham Boulevard past Lake Hollywood through the hills, down Ledgewood Drive and Beachwood Drive to Franklin and back (The Oaks will also be affected by traffic going West on Franklin Blvd. driving through their area to get around the Franklin gridlocked area). The Hollywood Hills is currently in a crisis mode as defined by the various city agencies working on the problem due to the significant amount of vehicles and pedestrians in the area trying to access the Hollywood Sign and Griffith Park. This mobility plan could significantly increase the danger to people traveling through and living in the Hollywood Hills and Hollywoodland by further increasing vehicular traffic throughout the area. There is no specific plan in the draft EIR to address and solve this potential problem and it needs to be included.

Response R202-1

The City received many comments regarding the proposed Enhanced Networks (BEN, VEN, NEN) in the Hollywood area. A majority of the commenters believed that implementing the network treatments would create detrimental traffic impacts for the neighborhood and local businesses. **Master Response 21** describes the changes made to the MP 2035 Enhanced Networks in Hollywood. MP 2035 provides a framework for community plan and community planning and therefore it is not appropriate to exempt any community plan at this programmatic stage.

The implementation of bicycle facilities associated with the MP 2035 is anticipated to improve safety and health outcomes for bicyclists and other road users. **Master Response 13** provides information for the EIR analysis and conclusion on bicycle safety. The implementation of the Enhanced Networks would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership. Each project would only proceed after appropriate project-level environmental review. See **Master Response 22** for an explanation of why the scope/level of analysis in the EIR is appropriate. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035 which discusses the future environmental review requirements and range of improvements. **Master Response 1** provides an explanation of the traffic impact analysis methodology conducted for the MP 2035.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R202-2

Further review of the designation of Beachwood Drive as a Neighborhood Enhanced Network (NEN) must take place as this area cannot support the excessive vehicular and pedestrian traffic at this time (this safety crisis is acknowledged by LAPD, LAFD, DOT, RAP, the Council Members office and the Mayor's office and all are

working on mitigation measures). Adding a bicycle lane would increase the danger to property and people to an unsustainable level with bicyclists, pedestrians and vehicles sharing the same street as the streets are too narrow and windy with many areas without sidewalks. The result of this review will conclude the importance of removing Beachwood Drive and all feeder roads from the NEN designation.

Response R202-2

See **Master Response 21** for the EIR analysis and conclusion of the removal of Beachwood Drive from the enhanced network designation.

LETTER NO. R203

Don Andres
Franklin/Hollywood West Residents Association
andres2007@sbcglobal.net

Comment R203-1

Based on that meeting, it is logically necessary to step back and take a better look at the potential solutions to future ‘mobility’ in the City of Los Angeles. Of utmost importance, it is vital to protect and preserve the residential neighborhoods that are subject to increased vehicular thru-traffic. Nearly every month, there is increased traffic transgressing these neighborhoods and significantly reducing the quality of life for the residents, and causing health and safety issues.

Response R203-1

See **Master Response 1** for the traffic impact analysis assumptions and methodology, **Master Response 2** for the EIR analysis and conclusion of potential effects to quality of life, and Master Response for the EIR analysis and conclusion of the potential diversion of vehicles due to travel lane conversion and potential for cut-through traffic.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R203-2

- *Plans to accommodate the numerous number of residents in the mountain and hillside communities that literally have no access to public transportation. Los Angeles is a unique community relative to other major cities with its Santa Monica Mountain Range transgressing the City. How does the Mobility Plan address this unique aspect of the Los Angeles community?*

Response R203-2

The implementation of the MP 2035 Enhanced Networks (TEN, BEN, VEN, PED) are intended to facilitate travel by driving, transit, bicycle, and walking throughout the City of Los Angeles. There are unique areas of the city (such as mountain areas) that may be less well served by the enhanced networks than others. MP 2035 is the first step in providing a transportation framework. Individual community plans will build on the MP 2035 framework to provide more area-specific solutions as appropriate and feasible. Within the Hollywood area, the City received many comments regarding the proposed Enhanced Networks (BEN, VEN, NEN). **Master Response 21** describes the changes made to the MP 2035 Enhanced Networks in Hollywood.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R203-3

- *Consider a plan to reduce the amount of thru-traffic in residential communities by defining unique ingress/egress points and forming more ‘cul-de-sac’ communities. This works very well in more modern cities like Palm Springs, but should be evaluated in an attempt to retrofit Los Angeles residential areas as part of a visionary Mobility Plan 2035. For example, a plan could be devised to reduce thru-traffic on Gardner St/Franklin Avenue north of Hollywood Blvd and west of La Brea via “cul-de-sac” concepts and*

eliminating thru-traffic. This is not only a completely residential community, but a heavy pedestrian traffic area due to the popularity of Runyon Canyon. I would think Spaulding Square and Sunset Square would also be potential candidates for “cul-de-sac” communities.

Response R203-3

The MP 2035 does not include potential access changes to residential communities in the City, such as street closures or cul-de-sac communities. These types of changes can be explored through the City’s Community Plan updates. **Master Response 18** contains information related to the diversion of vehicles due to travel lane conversions and the potential for cut-through traffic. See **Master Response 1** for the traffic methodology and **Master Response 22** for scope/level of analysis for the EIR.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R203-4

- *Do not increase speed on Fairfax Ave north of Fountain Ave to target speed of 40mph, but maintain or reduce speed on Fairfax Ave.*
 - *Fairfax Ave north of Fountain Ave to Hollywood is residential, with R1 single family homes, north of Sunset. The current posted speed limit is 35mph. Fairfax Ave should not become a freeway endangering the neighbors.*
 - *Any potential change in speed limit should be reduced speed, not increased speed though the residential neighborhood.*
 - *Increasing speed on Fairfax Ave would increase safety hazards for pedestrians and bike riders and more noise for the residents*

Response R203-4

The MP 2035 is not proposing changes to the target speeds or speed limits on Fairfax Avenue. Fairfax is designated as a Moderate Transit Enhanced street as part of the TEN. The changes being proposed as part of the Enhanced Networks are intended to improve safety within the City.

See **Master Response 1** for traffic methodology and **Master Response 22** for scope/level of analysis for the EIR.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R203-5

- *Re-evaluate the proposed use of Hollywood Blvd west of LaBrea. While this is a heavily trafficked route to the 101 Freeway, it is already a bottleneck, along with LaBrea, with the numerous closures of Hollywood just East of LaBrea. Reducing the number of lanes seems illogical.*

Response R203-5

See **Master Response 21** for the EIR analysis and conclusion of the removal of Hollywood Boulevard, west of La Brea, from the enhanced network designations.

Comment R203-6

- *Conduct new Traffic Studies for the Hollywood Area*
 - *Traffic studies for the Mobility Plan 2035 are seven years old and outdated, particularly for the Hollywood area. The traffic studies do not take in to account the numerous street and sidewalk closures which have tremendous impact on surrounding streets, such as Hollywood Blvd, Sunset Blvd, La Brea, Highland Ave and Cahuenga Blvd. Updated 2015 traffic studies should be included in the Draft EIR.*
 - *Additionally, traffic studies do not include the volume of new construction in the Hollywood area and close by City of West Hollywood La Brea and Sunset Blvd. Updated 2015 traffic studies must be conducted to include street closures, recently completed (last 3 years) and future construction should be included in the Draft EIR. Mobility Plan 2035*

Response R203-6

As part of the Final EIR, the traffic operations analysis for City roadways was updated to reflect Year 2014 conditions (see **Chapter 3.0 Corrections and Additions** for pages 4.1-14, 4.1-15, 4.1-32 through 4.1-34). The updated LOS did not result in any changes to the impacts related to traffic operations (**Impact 4.1-2**) or corresponding Mitigation Measures **T1** and **T2**. Refer to Corrections and Additions for pages 4.1-14, 4.1-15, and 4.1-32 through 4.1-34.

The MP 2035 EIR is a programmatic document that addresses impacts at an area level based on preliminary conceptual level information. As projects are designed more detailed analysis will be undertaken, but such analysis is not possible at this time since design details are not available. See **Master Response 1** for the traffic impact analysis methodology and traffic modeling assumptions for use in forecasting future conditions (as described in **Appendix C**). See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R203-7

- *Evaluate the cumulative effects of the massive number of new developments proposed and under construction with the City of LA/West Hollywood. These developments all lead to and increase the pipeline of traffic flowing through the Hollywood Blvd/ La Brea Avenue/Franklin Avenue route to the freeway and beyond.*

Response R203-7

As described in **Section 4.1 Transportation, Parking and Safety**, the model used to analyze the MP 2035 contains Citywide and regional growth assumptions from the SCAG 2012-2035 RTP/SCS. See **Master Response 1** for the traffic impact analysis methodology.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R203-8

- *Improve Community Outreach*
 - *Many neighborhoods and residents have only been made aware of the Mobility Plan 2035 and the proposed changes to streets within the past two weeks. A transportation plan that will potentially change neighborhoods forever should have and could have conducted much more effective stakeholder and community outreach, other than a "virtual online town hall" and out of area early evening meetings.*

- *Recommend earlier and more frequent opportunities to review the Mobility Plans.*
- *The lack of specifics, detail and unaddressed known issues and concerns has left stakeholders confused as to the real purpose of this plan, and created an “air of distrust”. At the very minimum, the Mobility Plan 2035 must use updated and realistic traffic studies and work from an updated Hollywood Community Plan prior to introducing more, new and additional layers to the already over-burdened streets and sidewalks.*

Response R203-8

See **Master Response 6** for the EIR analysis and conclusion regarding public participation and **Master Response 1** regarding the traffic methodology. **Chapter 1.0 Introduction** on page 1-2 of the EIR states that the “analysis presented herein is programmatic in nature because detailed designs are not available for specific roadway cross sections. Where there is potential for a significant adverse impact, this report identifies mitigation measures that would either eliminate the impact or reduce the impact to the maximum extent feasible.” As the EIR is a programmatic-level document, the project description does not include detail on the phasing or specific timing of individual projects as this information is unavailable at this time. As individual projects are considered, site-specific project-level impacts will be addressed at that time under a separate undertaking. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. R204

Charles Taylor Brown; William Funderburk; Michelle Owen; Cathy Roberts; Justin Urcis
La Brea-Hancock Homeowners' Association

Comment R204-1

LBHHA members have expressed numerous concerns related to the Recirculated EIR. We address them in outline form and request that we be granted either additional time to formulate more specific comments or meet with staff on the plan. The comments are outlined below:

Response R204-1

See **Master Response 6** for the EIR analysis and conclusion regarding public participation. The proposed MP 2035 and Draft EIR were both released in February 2014 for a 90-day public comment period. The RDEIR included an updated project description based on continued agency coordination and public comments received on the Draft MP 2035 and Draft EIR, additional model analysis that considers a more comprehensive analysis of installing bicycle lanes, additional miles on the TEN, and three additional alternatives. The RDEIR was made available for the required 45-day public review period. DCP continues to consider comments received on the plan through the public hearing and adoption process. No extension of the public review period is appropriate given the extensive review process and public input to date. An additional public hearing will be held before adoption of the project and certification of the EIR, where the City Council will receive additional public input.

Comment R204-2

--6TH STREET -- 6th Street has become a veritable speedway for traffic between Highland and La Brea with speeds up to an estimated 60 mph. There have been accidents at just about every LBHHA intersection on 6th street. Traffic calming is a priority as this stretch poses a safety hazard to our residents, including many young children.

Response R204-2

6th Street is part of the priority NEN proposed in the MP 2035. NEN improvements identified for a specific corridor would be oriented towards slowing and calming the traffic speeds and volumes to ensure that the street is safe and comfortable for people walking, bicycling or using other slow-speed forms of transportation (scooters, skateboards). **Master Response 20** contains additional information on the NEN.

Comment R204-3

-- CUT THROUGH TRAFFIC - Cut through traffic has increased on our north/south streets (Sycamore, Orange, Mansfield, Citrus) and will continue for the next 10 years of the subway build-out. GPS sensations like WAZE have further increased use of side streets. Putting bicycle lanes on heavily travelled roads like 3rd or Wilshire may push even more traffic to our streets. In addition, any traffic calming measures on 6th Street should be designed to ensure such measures do not increase cut through traffic on our neighborhood's north/south streets. Cut through traffic should be considered when making any changes to current street conditions in the area.

Response R204-3

The MP 2035 EIR is a programmatic document that addresses impacts at an Area Planning Commission level based on preliminary conceptual level information. As projects are designed more detailed analysis will be undertaken, but such analysis is not possible at this time since specific design details are not available. See **Master Response 1** for the traffic impact assessment methodology and **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035 and **Master Response 22** for an explanation of why the scope/level of analysis in the EIR is appropriate. See **Response R204-2** for information on 6th

Street and the NEN. **Master Response 18** discusses for the EIR analysis and conclusion for the diversion of vehicles due to travel lane conversions and potential for cut-through traffic.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R204-4

--BIKE LANES - Updated traffic studies need to be completed and funding needs to be secured for the next generation of bike lanes running through largely residential areas. Several of our committee members have suggested that the entire 4th street bikeway be moved to 6th street, as the present 4th Street bikeway is unsafe. Although the neighborhood has not developed a position on controls at Highland—many residents oppose stop lights—thought should be given to some type of control that allows bicyclists and their families to cross Highland safely without introducing more vehicular traffic into either Hancock Park or La Brea Hancock. With proper long term planning and funding, A safe and well designed bike lane on 6th that runs from Fairfax to Koreatown should be considered.

Response R204-4

The funding and implementation of the MP 2035 is described in **Master Response 9**. See **Response R204-2** for information on 6th Street and the NEN. The MP 2035 is not proposing the installation of new traffic signals along Highland. The traffic analysis for the project did not perform an intersection-level of analysis. The MP 2035 EIR is a programmatic document that addresses impacts at an APC level based on preliminary conceptual level information. As projects are designed more detailed analysis will be undertaken, but such analysis is not possible at this time since design details are not available. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035 and **Master Response 22** for an explanation of why the scope/level of analysis in the EIR is appropriate. .

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. R205

Laura
Save Westwood Village
Fix the City

Comment R205-1

My comments are focused on proposals for the Westwood area, and the lack of citywide infrastructure capacity (water lines, traffic, lack of off-street parking for shoppers and the establishment of parking revenue districts for street and parking improvements within the meter districts which generate the revenue, emergency response service times, sidewalks, roadways, park maintenance, etc.

Response R205-1

See **Response R200-1**. See **Master Response 3** regarding loss of on-street parking.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-2

Note: The bike lane on Westwood Boulevard is currently between Santa Monica Boulevard and Wellworth Avenue. It does not continue north of Wilshire, as quoted above. Please correct this error.

Response R205-2

The text referred to in the EIR “north of Wilshire”, is referring to the proposed treatments with the MP 2035. The text states that “MP 2035 now proposes to include Westwood Boulevard on the TEN while retaining short portions on the BEN (north of Santa Monica Boulevard to Le Conte Avenue).” The language pertaining to existing bicycle lanes states, “Remaining portions of Westwood Boulevard would retain their existing bicycle lanes.” As shown in **Figure 3-4B** on page 3-23 of the RDEIR, there is an existing bicycle lane on Wilshire Boulevard that extends from Santa Monica Boulevard to Wellworth Avenue.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-3

It is not clear from the above EIR statement if parking would be removed on any segment of Westwood Boulevard for bicycle lanes. The statement only addresses maintaining travel lanes, not parking lanes. Please analyze the impacts of removal of parking lanes on urban decay and cut-through neighborhood traffic.

Response R205-3

For the purpose of analyzing impacts of the MP 2035, implementation of the BEN and TEN were assumed to result in the conversion of a vehicular travel lane to a bicycle or transit lane. The conversions, in general, are not anticipated to result in the removal of on-street parking. The proposed TEN and BEN designations to Westwood Boulevard would not result in the loss of on-street parking. See **Master Response 22** for an explanation of why the scope/level of analysis in the EIR is appropriate. **Master Response 3** provides information for the EIR analysis and conclusion on the loss of on-street parking with the implementation of the MP 2035.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-4

Removal of travel lanes would create more gridlock, more greenhouse gases and cut-through traffic. Removal of parking lanes would create urban blight, added congestion as autos search for parking for shopping or dining on Westwood Boulevard, as well as cut-through traffic in the adjacent residential community. The adjacent streets are limited to permit parking, so the search for parking may involve extensive additional driving as a result of removing parking spaces.

Response R205-4

Master Response 3 provides information for the EIR analysis and conclusion on the loss of on-street parking with the implementation of the MP 2035. For the purpose of analyzing impacts of the MP 2035, implementation of the BEN and TEN were assumed to result in the conversion of a vehicular travel lane to a bicycle or transit lane. **Master Response 4** provides information for the EIR analysis and conclusion on the air quality effects from the project. See **Master Response 1** for the traffic impact analysis methodology.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-5

Please explain how adding buses only to slow them down by requiring an added signal phase to accommodate cyclists at every intersection on Westwood Boulevard, makes sense and is safe. I Support the conclusions with substantial evidence. So thousands of bus riders are asked to sacrifice their commute time to accommodate about 78 cyclists on Westwood Boulevard.

Please provide an analysis based on substantial evidence that adding buses while creating a bike lane that creates substandard traffic lanes and added signal phases that delays all traffic to accommodate cyclists, is a viable or sane alternative to routing cyclists to local residential streets and maintaining the safety of standard traffic lanes for thousands of bus riders and emergency vehicles.

Response R205-5

Potential modifications to traffic signals along Westwood Boulevard are not known at this time. The traffic analysis for the project did not perform an intersection-level of analysis. However, new signal phases at every intersection along Westwood Boulevard to accommodate cyclists are not anticipated as part of the MP 2035. Signal phasing may be modified to accommodate cycle tracks on select BEN facilities; however, the MP 2035 is not recommending a cycle track on Westwood Boulevard. The MP 2035 EIR is a programmatic document that addresses impacts at an APC level based on preliminary conceptual level information. As projects are designed more detailed analysis will be undertaken, but such analysis is not possible at this time since design details are not available. As stated in **Chapter 1.0 Introduction** and **Section 4.1 Transportation, Parking, and Safety** of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles' Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions. See **Master Response 1** for the traffic impact analysis methodology. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

The MP 2035 includes a comprehensive system of local residential roadways, called the NEN, as part of the package of treatment options. **Master Response 20** provides information for the EIR analysis and conclusion on the NEN. **Master Response 14** provides information for the EIR analysis and conclusion on emergency vehicle access and response times.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-6

Analyze the impact of added bus traffic on Westwood due to the opening of the Expo Line and in addition, the impacts of added signal phases for bicyclists.

Response R205-6

The City of Los Angeles' Travel Demand Model, used to help evaluate potential impacts from the MP 2035, does include the Expo Line Phase II project and also includes the available information on all other programmed future bus and rail transit service in the region (as described in **Appendix C**). The model is also built on the comprehensive land use and socio-economic data developed for the 2012-2035 RTP/SCS, which includes all cumulative land use changes anticipated in the City through year 2035. New signal phases along Westwood Boulevard to accommodate cyclists are not anticipated as part of the MP 2035. Signal phasing may be modified to accommodate cycle tracks on select BEN facilities; however, the MP 2035 is not recommending a cycle track on Westwood Boulevard. See **Master Response 1** for the traffic impact analysis methodology. See **Response R205-5** for the EIR analysis and conclusion on traffic signals along Westwood Boulevard.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-7

Specifically, analyze the added greenhouse gases due to slowing traffic from signal phase addition, and impacts on bus traffic movement.

Response R205-7

Potential modifications to traffic signals are not known at this time. Signal phasing may be modified to accommodate cycle tracks on select BEN facilities; however, the MP 2035 is not recommending a cycle track on Westwood Boulevard. See **Response R200-7** for the EIR analysis and conclusion of GHG and bus movement. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-8

Analyzing project EIRs does not excuse the City from analyzing cumulative infrastructure and the impacts of the proposed maps for the safety and mobility disabled travelers, pedestrians, bus riders, cyclists, trucks, autos and emergency vehicles.

Response R205-8

As stated in **Chapter 1.0 Introduction** and **Section 4.1 Transportation, Parking and Safety** of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles' Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions. See **Master Response 1** for the traffic impact analysis methodology.

The MP 2035 EIR should not be viewed as an encyclopedia of all potential impacts on a wide range of topics unrelated to potential impacts associated with the proposed project. The plan is programmatic in nature and addresses change issues at a very broad level, without the benefit of detailed design for specific improvements. The focus of the plan is on changes to street function and capacity to accommodate and balance all modes and the EIR characterizes the environmental effects of these proposed classifications of mobility improvements. The specific issue of safety is site specific and project specific in nature. As future subsequent projects are proposed with specific geometric designs, traffic volumes, pedestrian volumes, real world safety considerations will be analyzed under separate environmental review. At this stage in the planning process, it is appropriate for this program EIR to identify that these considerations will be addressed when the necessary design and operation details are available. See **Master Response 22** for an explanation of why the scope/level of analysis in the EIR is appropriate. See also **Master Response 14** for the EIR analysis and conclusion regarding the analysis of emergency vehicle access. The EIR determined that a potentially significant and unavoidable impact would occur to emergency access and response times.

Comment R205-9

Even if bike lanes doubled their numbers, would these riders be safer, and how many bus riders, for example, would be adversely impacted by added delays.

Response R205-9

The EIR does not identify a potentially significant impact on safety as a result of bicycle lanes. The EIR does not have to prove that something is "safer" or better than existing conditions, just that it does not create a potential significant environmental impact. The MP 2035 EIR is a programmatic document that addresses impacts at an APC level based on preliminary conceptual level information. As projects are designed more detailed analysis will be undertaken, but such analysis is not possible at this time since street level design details are not available. See **Master Response 1** for the traffic impact analysis methodology. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. **Master Response 13** provides additional information on bicycle safety.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-10

For example, LAFD response time on gridlocked arterials, the EIR relies upon lights and sirens, when in fact there is no room to pull over if lights and sirens are used. Indeed, that is why the City's CEQA Threshold Guide provides guidance in how to address and measure significant adverse impacts of gridlocked streets on emergency response time.

Response R205-10

The EIR evaluates potential impacts to emergency access vehicles. See **Response R200-13**. **Master Response 14** provides a discussion on emergency vehicle access and response times. The EIR determined that a potentially significant and unavoidable impact to emergency access and response time would occur with the proposed project.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-11

1. *We request that the EIR be revised again to provide an analysis using current traffic data (not outdated 2008 data) and the City's CEQA Threshold Guide, as well as accident data for every proposed bike lane or bike path.*

Response R205-11

See **Response R200-4**.

Comment R205-12

2. *Please provide diagrams showing all sidewalk dimensions for Westwood Boulevard, with an overlay of standard to enhanced sidewalks (10-15 feet wide). What impacts would standard sidewalks have on traffic (auto, bus, bicycle, emergency responders)?*
3. *Please analyze the impact of substandard traffic lanes on both safety (response time, accident rates) and delays for buses, emergency vehicles, autos, pedestrians and bicyclists.*

Response R205-12

Sidewalk dimensions for the requested roadway segments are not available at this time (see **Response R200-5**). See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. **Response R200-6** provides additional information on the roadway design treatments in the City's Complete Streets Design Guide: Great Streets for Los Angeles.

Comment R205-13

4. *The EIR fails to provide an analysis of the increased green house gas emissions due to delays of the significant number of buses on Westwood Boulevard (over 400/day), and projected increases to accommodate the 5000 additional riders departing from the Expo Line.*

Response R205-13

See **Response R200-7** for the EIR analysis and conclusion of GHG and bus movement. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-14

5. *Please revise the EIR to provide an objective analysis of the delays of buses due to adding a signal phase for bicycles at each intersection, from National to Le Conte.*

Response R205-14

Potential modifications to traffic signals along Westwood Boulevard are not known at this time. Signal phasing may be modified to accommodate cycle tracks on select BEN facilities; however, the MP 2035 is not recommending a cycle track on Westwood Boulevard. Refer to **Responses R205-5** for the EIR analysis and conclusion. The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-15

8. *Please conduct an analysis of accident frequency of roadways with and without bike lanes. There is an assumption throughout the EIR (unsupported by substantial evidence) that a bike lane on Westwood Boulevard would make Westwood Boulevard safer, when in fact, accident data provided by UC Berkeley, indicate that there were more accidents on Westwood Boulevard between Santa Monica Boulevard and Wilshire Boulevard, where there is a bike lane, than on segments north and south of the bike lane on Westwood Boulevard without bike lanes.*

Response R205-15

The commenter incorrectly asserts that the EIR assumes a bike lane on Westwood Boulevard would make Westwood Boulevard safer. See **Master Response 10** for the EIR analysis and conclusion regarding Westwood Boulevard. **Section 4.1, Transportation, Parking and Safety**, of the EIR cites to numerous studies regarding the safety of bicyclists in the generalized context of transportation infrastructure. **Master Response 13** provides additional detail for the EIR analysis and conclusion on bicycle safety. See **Response R205-8** regarding the site-specific nature of safety. The EIR does not identify a potentially significant impact on safety as a result of bicycle lanes. The EIR does not have to prove that something is “safer” or better than existing conditions, just that it does not create a potential significant environmental impact. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-16

9. *There appears to be an assumption that a straight line is the safest route, when in fact, local residential streets, which are far less congested, may turn out to be far safer. Please provide a safety analysis of the two alternatives regarding cycling safety.*

The tradeoff may be between speed and safety, not just for bikers, but for bus riders on Westwood Boulevard, and emergency responders on Westwood Boulevard. Please provide an objective analysis that compares safety, cycling speed and how adverse impacts might be mitigated and funded.

Response R205-16

The EIR does not identify a potentially significant impact on safety as a result of bicycle lanes. The EIR does not have to prove that something is “safer” or better than existing conditions, just that it does not create a potential significant environmental impact. The MP 2035 includes a comprehensive system of local residential roadways, called the NEN, as part of the package of treatment options. **Response R200-10** and **Master Response 22** provide additional information on the level of analysis conducted for the MP 2035 and the NEN. **Master Response 13** provides the EIR analysis and conclusion regarding bicycle safety. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-17

It makes unsubstantiated assumptions that bike lanes will improve the safety and mobility of bicyclists and traffic as a whole. In fact, substantial evidence exists for Westwood Boulevard, that the area with a bike lane, between Santa Monica Boulevard and Wilshire Boulevard, has more bike accidents than areas south and north without bike lanes.

There is no evidence to support this conclusion. The EIR also fails to analyze the impacts of proposals in this EIR on pedestrians, the business community, bus-riders and disabled commuters, and public safety.

Response R205-17

The implementation of bicycle facilities associated with the MP 2035 is anticipated to improve safety and health outcomes for bicyclists and other road users. **Master Response 13** provides information for the EIR analysis and conclusion on bicycle safety. See **Master Response 22** for an explanation of why the scope/level of analysis in the EIR is appropriate. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-18

For example, the EIR advocates standard or above-standard sidewalks, () it did not provide an inventory of sidewalk dimensions and the impacts of recommendations on those sidewalks. It does admit that pedestrians represent 14 percent of all trips, while bicyclists represent 1 percent of all trips. In effect, the proposals adopt a one step forward, two steps backward approach to improving mobility and safety.

There is a disconnect between rhetoric and reality that an EIR is required to address. This EIR fails to provide the objective analysis to test the validity of the claims made by the City. In the case of Westwood Boulevard, those sidewalks south of Wilshire Boulevard are as narrow as four feet, in some locations, far from standard dimensions. The first priority of a mobility element would be to upgrade those sidewalks. But there is no discussion or analysis of upgrading sidewalks, the impact on traffic and parking and bike lanes of such upgrades, etc.

Response R205-18

The implementation of the MP 2035 would be consistent with the design treatments in the City's Complete Streets Design Guide: Great Streets for Los Angeles. See **Response R200-6** for the EIR analysis and conclusion on the City's Complete Streets Design Guide. The commenters concern regarding substandard sidewalks is related to existing deficiencies and not to the proposed project. See **Response R200-11** for information on the City's agreement to fix existing sidewalk deficiencies. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-19

This EIR is a programmatic EIR. As such, it is required to provide a citywide analysis based on current data and projected cumulative data. Instead, the EIR illegally postpones this analysis for project-specific EIRs. No doubt, some of those EIRs will claim that the program EIR provided the required analysis and permits the projects without any in-depth analysis.

Response R205-19

See **Master Responses 1, 2, 4, 11 and 11**, discussing environmental review and identified impacts to traffic, air quality, GHG's, noise from the project. See **Master Response 22** discussing the scope/level of review and **Master Response 19** for a discussion of future projects and the requirements for environmental review.

Comment R205-20

The most glaring omission from this EIR is the failure to analyze and mitigate emergency respond time under current conditions, and what proposed changes would do that already inadequate but unmitigated environmental impact.

The inadequacy of emergency response time is a fundamental public safety problem that under CEQA, cannot be ignored. City CEQA Threshold Guidelines provide for measurement of fire response time. We request that the City Planning Department follow its own CEQA Guidelines and conduct the mandatory analysis of emergency

response time, infrastructure adequacy, and if there is no feasible mitigation, then be honest with the City Council and the public by issuing a Statement of Overriding Considerations.

For example, the EIR proposes to rely on lights and sirens to permit emergency responders to reach their destinations. Unfortunately, there is no analytical bridge between current gridlock and the efficacy of lights and sirens for a gridlocked area in which there is no space to pull over and yield.

Response R205-20

The EIR identifies the impact to emergency access as potentially significant unavoidable and a statement of overriding considerations will be necessary to approve the project. As noted in the EIR, “LAFD has a mandate to protect public safety and must respond to changing circumstances and therefore would act to maintain response times. The proposed project together with cumulative growth would increase congestion, which could impede emergency access.” See also **Master Response 14**.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-21

CEQA does not permit the City to turn a blind eye to current conditions and just hope for the best. Neither does state law, which mandates that the General Plan be internally consistent and not allow runaway development without adequate infrastructure. The irony in this situation is that the bike lane maps are proposed to improve safety, without substantial evidence to support that claim.

CEQA does not permit non-disclosure and analysis of how inadequate city services are by postponing analysis until later, through a project EIR.

Response R205-21

Existing conditions presented in the Final EIR are representative of the conditions for each issue area in 2013, the year the NOP was published and most recently updated traffic to year 2014. See **Response R200-14, R205-1, and 205-19** for the EIR analysis and conclusion of legislative requirements, infrastructure and development, bicycle safety and programmatic and project specific environmental review. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-22

There is no analysis in this EIR to determine the adverse impacts on pedestrian safety, busrider service time, and disabled access to mass transit.

Response R205-22

The implementation of MP 2035 would be consistent with the design treatments in the City’s Complete Streets Design Guide: Great Streets for Los Angeles. The guide contains roadway design features, such as sidewalk dimensions, for each roadway designation. See **Master Response 24** regarding safety for pedestrians and other vulnerable populations. See **Response R200-6** for the EIR analysis and conclusion on the City’s Complete Streets Design Guide. See **Response R200-17** for information on Complete Streets and their goal of providing safe and efficient transportation for pedestrians (especially for vulnerable users such as children, seniors and the disabled), bicyclists and transit riders.

Comment R205-23

This EIR is rife with speculative conclusions about emergency response time, a vital public safety issue throughout the city, the impact of gridlock on emergency response time (e.g., suggestions that cars yield to emergency vehicles is nonsensical in areas of the city where the LOS is E or F and there is no open area to pull over and wait. An EIR is required to provide analysis of current baseline traffic and projected cumulative impacts. No such analysis was provided, and subsequent project EIRs are not sufficient to make this EIR adequate. These are cumulative impacts related to a program EIR. Mitigation must be provided in this EIR and not wait for project EIRs.

Lights and sirens cannot mitigate the lack of adequate staffing, facilities and equipment; lights and sirens are ineffective when there is gridlock as defined as LOS F and no space to yield.

Response R205-23

In addition, the EIR identifies a potentially significant and unavoidable impact to emergency services and a Statement of Overriding Considerations will be prepared in conjunction with the required Findings of Fact for the proposed project. **Master Response 14** provides the EIR analysis and conclusion on emergency vehicle access and response times. See also **Response R200-13**.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-24

This EIR must provide a statement of overriding considerations regarding the current inability of the city to mitigate inadequate public safety response time as defined by the city as meeting the standard of under five (5) minutes 90% of the time. Substantial evidence has already been submitted for this EIR that shows that the City Controller found in a May 18, 2012 audit of LAFD that it failed to meet the standard response time; and on June 28, 2013, the Los Angeles County Grand Jury published a report documenting inadequate response time and deaths attributed to inadequate LAFD response time.

The EIR does not analyze the impact on emergency response time of narrowing traffic lanes or parking lanes to create a bike lane. There is no substantial evidence of how substandard traffic or parking lanes impact large fire emergency vehicles ability to reach accidents and fires and the mix of large buses and cars on substandard lanes?

Response R205-24

This EIR identifies a potentially significant and unavoidable impact to emergency services and a Statement of Overriding Considerations will be prepared in conjunction with the required Findings of Fact for the proposed project.

CEQA requires that impacts be measured compared to existing conditions. So an existing impact does not require a statement of overriding considerations, only if the project would add significantly or add a cumulatively considerable contribution to the impact. In the context of narrowing of traffic or parking lanes to bike lanes, the proposed lane widths included in the Complete Streets Design Guide are consistent with current Department of Transportation policy and the California Manual on Uniform Traffic Control Devices. See also **Master Response 14** for the EIR analysis and conclusion regarding emergency response.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-25

No analysis of the safety impacts of substandard lanes has been made, nor impacts on bus passenger rides from the Expo Line to the UCLA campus. An anticipated additional 5000 riders from the Expo line station at Westwood and Exposition will have impacts on traffic flows, emergency response time, pedestrian safety, bike safety (more buses to pass) and handicapped bus passenger off- and on-loading at the curb, as required by the Americans with Disabilities Act, as shown in the photo below.

Substandard sidewalks do not allow for wheelchair turning radius, as shown in the photo below.

Most Westwood Boulevard sidewalks are substandard. In addition to impacting the disabled, these narrow sidewalks make it a challenge for baby-strollers to negotiate the tight space, and lack space to park bicycles. Please provide an analysis of safe, standard-to larger sidewalks on the mobility of disabled persons and on pedestrian movement and safety. The EIR does not address the space needs of handicapped travelers. Please provide an analysis of current dimensions and proposed dimensions on disabled bus, auto and local users of Westwood Boulevard.

The EIR is silent with regard to all of these serious and significant adverse environmental impacts in the name of less than 1% of the commuters in the city. The rights of pedestrians to a safe environment, the rights of the Passenger leaving bus at Westwood Boulevard and Le Conte Avenue (courtesy of Debbie Nussbaum) Substandard sidewalk on Westwood Boulevard north of Santa Monica Blvd. on western side. handicapped, and the ability of bus riders to get to work and school on time are all left up for grabs by an entitled 1 percent of commuters sharing Westwood Boulevard. The EIR is required to analyze the impacts of proposed bikeways and bike lanes on the 99% who share Westwood Boulevard.

Response R205-25

The City of Los Angeles' Travel Demand Model, used to help evaluate potential impacts from the MP 2035, includes the Expo Line Phase II project and also includes the available information on all other programmed future bus and rail transit service in the region (see **Response R205-6**). The model is also built on the comprehensive land use and socio-economic data developed for the 2012-2035 RTP/SCS, which includes all cumulative land use changes anticipated in the City through year 2035. See **Master Response 1** for the traffic impact analysis methodology.

The implementation of the MP 2035 would be consistent with the design treatments in the City's Complete Streets Design Guide: Great Streets for Los Angeles. The guide contains roadway design features, such as sidewalk dimensions, for each roadway designation. The commenters concern regarding substandard sidewalks is related to existing deficiencies and not to the proposed project. See **Response R200-6** for additional information on the City's Complete Streets Design Guide and **Response R200-11** for information on the City's agreement to fix existing sidewalk deficiencies. See **Response R200-17** for information on Complete Streets and their goal of providing safe and efficient transportation for pedestrians (especially for vulnerable users such as children, seniors and the disabled), bicyclists and transit riders. See **Master Response 24** regarding safety for pedestrians and other vulnerable populations. See **Response R200-1** related to analysis and existing deficiencies.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-26

No analysis has been conducted of the emergency access impacts of narrowing traffic and parking lanes. The EIR fails to analyze the impacts of bike lanes on pedestrian safety, handicapped bus rider on- and off-loading, and adverse impacts on bus service efficiency due to added signalization phases at intersections to accommodate bikers.

The Westwood Boulevard bike lane/path does not address the safety impacts of substandard sidewalks along Westwood Boulevard nor the violation of ADA requirements for off-loading handicapped passengers, as shown in the attached photo.

The significance of the photograph to the left is that the sidewalks within Westwood Village are above- standard width and therefore allow for off-loading handicapped passenger.

However, south of Wilshire Boulevard, the sidewalks are substandard (often between four and five feet wide, with no parkway strip). Thus the space mandated by the Americans with Disability Act to off-load and on-load handicapped bus and auto passengers along Westwood Boulevard is not available. This is compounded by proposed bike paths and lanes, which shrink the space available to safely offload handicapped passengers. Thus far, proposals for bike lanes on Westwood Boulevard fail to analyze the handicap access requirements, pedestrian safety, and impacts on emergency response vehicles, and bus-riders.

Indeed, pedestrian safety has been compromised by bike riders who use sidewalks, as shown in the photo at right (photo courtesy of Debbie Nussbaum).

Westwood Boulevard, south of Wilshire lacks:

- *space for bike racks,*
- *proposals have illustrations of a bike lane with a tree-lined median in the middle of a left-turn pocket with no regard to the impacts on emergency response time and pedestrian safety.*
- *for off-loading handicapped passengers, there must be a raised curb. Thus a bike lane against the curb, or a bike lane with a painted buffer, impede handicap bus passengers by denying them access to the curb for on and off loading, an ADA requirement..*
- *The “Remove Nothing” bike lane proposal of Ryan Snyder would not provide the federally mandated disabled off-loading space.*
- *At some bus stops along Westwood Boulevard there is hardly room for pedestriansto pass a bus stop (e.g., in front of Ross Dress for Less) at Rochester and Westwood Boulevard.*

Response R205-26

In addition, the EIR identifies a potentially significant and unavoidable impact to emergency services and a Statement of Overriding Considerations will be prepared in conjunction with the required Findings of Fact for the proposed project. See **Master Response 24** regarding safety for pedestrians and other vulnerable populations. See **Master Response 14** for the EIR analysis and conclusion regarding impacts to emergency response. The implementation of the MP 2035 would be consistent with the design treatments in the City’s Complete Streets Design Guide: Great Streets for Los Angeles. The guide contains roadway design features, such as sidewalk dimensions, for each roadway designation. The commenters concern regarding substandard sidewalks is related to existing deficiencies and not to the proposed project. See **Response R200-1** related to existing deficiencies and analysis. See **Master Response 22** discussing the EIR scope/level of review. See **Response R200-6** for additional information on the City’s Complete Streets Design Guide and **Response R200-11** for information on the City’s agreement to fix existing sidewalk deficiencies. See **Reponse R200-17** for information on Complete Streets and their goal of providing safe and efficient transportation for pedestrians (especially for vulnerable users such as children, seniors and the disabled), bicyclists and transit riders. The MP 2035 is not proposing to implement the “Remove Nothing” bike lane proposal from Ryan Snyder.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R205-27

The EIR must provide substantial evidence that bike paths and bike lanes are safer than existing conditions. There is no evidence in this EIR to support this conclusion.

Response R205-27

At the program level, proposed networks do not have specific design details available at this time. In addition, the EIR does not identify a potentially significant impact on safety as a result of bicycle lanes. **Master Response 13** provides information for the EIR analysis and conclusion on bicycle safety and references to studies that demonstrated improved safety. In addition, the EIR does not have to prove that something is “safer” or better than existing conditions, just that it does not create a potential significant environmental impact. The implementation of bicycle facilities associated with the MP 2035 is anticipated to improve safety and health outcomes for bicyclists and other road users.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. R205A

Laura
Save Westwood Village
Fix the City

Comment R205A-1

I wish to supplement the comments filed earlier today, by adding a statement that VMT does not have any relationship with air quality impacts. Only LOS provides that measure. Thus reliance on VMT does not yield improvements in air quality. Los Angeles is a nonattainment area. It makes no sense to utilize a measure that does not improve air quality.

Response R205A-1

See **Master Response 4** for the EIR analysis and conclusion regarding potential air quality effects of the project. CARB has designated the South Coast Air Basin as a nonattainment area for O₃, PM_{2.5}, and PM₁₀. SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards in the district. The SCAQMD is responsible for preparing the regional Air Quality Management Plan (AQMP). The AQMP is the SCAQMD plan for improving regional air quality. It addresses State and federal Clean Air Act requirements and demonstrates attainment with State and federal ambient air quality standards. The AQMP provides policies and control measures that reduce emissions to attain both State and federal ambient air quality standards by their applicable deadlines.

Information necessary to produce the emission inventory for the AQMP is obtained from the SCAQMD and other governmental agencies, including CARB, Caltrans, and the SCAG. Each of these agencies is responsible for collecting data (e.g., industry growth factors, socio-economic projections, travel activity levels, emission factors, emission speciation profile, and emissions) and developing methodologies (e.g., model and demographic forecast improvements) required to generate a comprehensive emissions inventory. Caltrans provides SCAG with information regarding highway projects. SCAG incorporates these data into their Travel Demand Model for estimating/projecting VMT and speeds. SCAG's socioeconomic and transportation activities projections in their RTP are applied in the AQMP. On-road emissions are derived from the emission factors in CARB's EMFAC model and transportation activities and speed distribution from SCAG's Travel Demand Model.

This methodology is similar to the methodology used to estimate regional criteria pollutant and greenhouse gas emissions for the proposed project. As stated on page 4.3-16 of the Draft EIR, the traffic model developed for the MP 2035 is based on the Transportation Specific Plan (TSP) model, which utilizes the TransCAD Version 4.8 Build 500 modeling software and has been calibrated and validated for current conditions. The model-estimated changes in circulation system conditions are conservative, vehicle-centric estimates based on historical travel behavior patterns and do not account for changes in demographics, vehicle ownership patterns, energy prices, and migration to alternate modes (pedestrian, bicycle and transit) that would lead to decreasing vehicular volumes. Transportation demand models are largely dependent on historical travel patterns and mode choices when forecasting future traffic projections. Recent research in this area suggests that factors correlated with annual VMT over the last 60 years include the economy, demographics, technology, and the urban form of the built environment. Specifically, this research shows both cyclical recession effects and a structural leveling of the economy and travel. However, the conservative traffic model does not recognize these factors. Refer to **Section 4.1 Transportation, Parking and Safety** for a detailed discussion related to the methodology for estimating VMT.

Regarding the scientific reason for using VMT to estimate emissions, the amount of pollution that cars generate depends on various factors, such as vehicle model year, engine size, fuel type, engine and after-treatment technology. For air quality studies, the emissions are typically estimated using emission factors in grams per

mile obtained from the EMFAC model and multiplied by the miles traveled per day. The emission factors developed by CARB in the EMFAC model are based on vehicle testing at a range of speeds. Emissions for the proposed project were estimated using EMFAC2014 emissions factors in five mile per hour increments from 0 to 65+ miles per hour.

Intersection LOS is typically used to assess the potential for pollutant hot-spots as opposed to regional emissions. The potential for localized hot-spots is discussed in detail on page 4.3-25 of the Draft EIR. Project-related changes in emission levels would not be high enough to cause an exceedance of air quality standards. This conclusion was demonstrated through a localized pollutant concentration analysis for a City street with a volume approaching 35,000 vehicles per day (La Brea Avenue between Beverly Boulevard and 6th Street). The analysis was completed using the CARB CALINE4 model and assuming that peak hour traffic is commonly ten percent of average daily traffic. The highest hourly delay at this intersection was assumed to be 215 seconds per vehicle during the AM peak hour (based on modeling performed for a bicycle lane). It was assumed that these vehicles would travel five miles per hour during the delay period creating a constant 0.3-mile emissions source. The analysis demonstrated that the significantly increased delay at already congested intersections would not cause an exceedance of the applicable standards.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. R206

Dr. Jerry Brown
Westwood Neighborhood Council

Comment R206-1

It is inconceivable that a horde of planners should not, at some point in a document hundreds of pages in length, have given some indication of having used common sense in planning for the future.

A plan which, if implemented, is anticipated to worsen the flow of traffic unless hundreds of thousands of persons convert to using bicycles to commute to work, get kids to school, shop, and traverse this great, vast city, should be dismissed as foolishness.

Oft repeated is the mandated need to look for something to replace LOS as the measure of traffic flow status! A rose by any name would smell as sweet, and the corpse flower by any name would smell as bad.

It is abundantly clear that the Plan as proposed is misnamed, and should, in reality, be called the Immobility Plan 2035.

Response R206-1

See **Master Response 1** for the traffic impact analysis methodology and regarding the conservative vehicle-centric assumptions included in the analysis of the project. The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. **Master Response 15** provides a discussion for the EIR analysis and conclusion on the legislative changes that have resulted in changes to the City's vision for transportation and mobility for current and future generations. **Master Response 1** provides additional information regarding the traffic impact analysis conducted for the MP 2035.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. R207

Barbara Broide
Westwood South of Santa Monica Blvd Homeowner's Association

Comment R207-1

When it comes to planning, despite the outreach that was done on this Mobility DEIR draft, our community still does not feel that it has been engaged on the “nitty gritty” level of contributing to the Plan. There is a low level of awareness on the part of most constituents and this is likely because a citywide document is not something people readily relate to. We cannot help but feel that in its rush to complete the 2035 Mobility Study, the City has attempted to create a regional plan, yet inadequate attention has been devoted to the unique qualities of our Westside neighborhood. Perhaps this has happened elsewhere but at the very least, we need a team of planners to consult with the homeowners associations and neighborhood councils in the Westside at a far greater level of collaboration than has been evident here. The ill-conceived nature of the plans for the Westside are vivid evidence of the inability of the Planning Department to adequately negotiate with residents of the region and to build consensus for a plan that truly recognizes the diverse needs of residents, businesses, homeowners, and institutions who depend on an effective and reliable transportation and circulation system. We lament that this environmental impact report only serves to memorialize the inadequacy of the City's mobility planning effort.

Response R207-1

See **Master Response 6** for the EIR analysis and conclusion regarding public participation. DCP continues to be receptive to comments on the proposed plan through the hearing and adoption process. See **Master Response 19** for the EIR analysis and conclusion of the implementation of the enhanced networks.

Comment R207-2

How are we to comprehend how a document called a “Mobility Plan” can actually make numerous recommendations that will result in “significant and unavoidable” impacts associated with “increased congestion”. Los Angeles does not need to be developing projects that will create more congestion. These changes do not pass any “cost benefit” analysis evaluations. When one looks at the specific changes outlined for our area, it appears that the proposals once made for Westwood Blvd have been shifted onto other area streets. Like Westwood Blvd, these other streets are not meant to handle the capacity being planned. We are therefore opposed to the recommendations made thus far (although a number of them are sufficiently vague so that it is difficult to know what the exact impacts will be). Just because bicycle facilities are exempt from CEQA review, it does not mean that the City should not go forward with doing meaningful due diligence to understand the tradeoffs of various options and to best quantify impacts and plan for mitigations as needed. We concur with the observations made in the correspondence from the West of Westwood Homeowners Association and wish to add the following comments:

Response R207-2

See **Master Response 1** regarding the traffic impact analysis methodology and **Master Response 11** for the EIR analysis and conclusion regarding the development of the MP 2035, **Master Response 15** for the EIR analysis and conclusion regarding transportation performance metrics, and **Master Response 19** for the EIR analysis and conclusion of the implementation of the enhanced networks and **Master Response 22** for an explanation of why the scope/level of analysis in the EIR is appropriate. .

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-3

Inappropriate dedication of named residential streets to bicycle traffic:

Veteran, Tennessee and Manning Avenues are unsuited to bicycle dedication because, as noted by the West of Westwood Homeowners Association, none has either the width or the intersection controls to permit safe bicycle travel on them. There is no sensible way to provide safe bicycle travel on Veteran Avenue when there is barely room for two active traffic lanes with a permanent parking prohibition on one side of the street. Moreover the alignment of the street is short, extending only from Pico Boulevard to Sunset Boulevard, neither of which is suitable for safe bicycle travel. As you may know, Veteran is a key route for vehicles accessing Sunset Blvd. as few other north-south streets provide such a link. (Nearby Westwood Blvd. is not accessible to vehicles through campus (although a bicycle could access Sunset going through campus).)

Response R207-3

As part of the Final EIR, the following changes were made in the Westside area: Veteran and Tennessee Avenues were removed from the priority NEN; Santa Monica Boulevard west of Westwood Boulevard was removed from the BEN. Veteran in particular, due to its hilly condition north of Santa Monica Boulevard does not provide the most comfortable bicycling experience; and therefore, it was determined that Prosser to the west would better serve the bicycling community with a quality north-south bicycle facility. The east-west segments on Tennessee Avenue and Santa Monica Boulevard were then subsequently removed due to lack of a north-south corridor to then connect to. **Master Response 20** provides additional information on the types of treatments that would be implemented as part of the NEN. The implementation of the Enhanced Networks (e.g., NEN) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

Comment R207-4

A bicycle lane on Tennessee Avenue, another narrow street, will likely result in a demand for a signal at Westwood Boulevard, enhancing this small street for automobile traffic as an east-west alternative to Olympic Boulevard and Pico Boulevard: a terrible planning decision that would divide a quiet neighborhood with enhanced vehicular traffic. It is unacceptable to have a traffic signal at Tennessee and Westwood that would permit for vehicle traffic to cross from one side of Westwood to the other on Tennessee. Moreover, the Tennessee crossing at Overland Avenue has been a fraught intersection for many years, resulting in more than one pedestrian death nearby. Since Overland Avenue is a main artery from Century City to the I-10 Freeway, the already-undersized street is burdened with excessive traffic as we speak. Adding a bicycle component to this intersection will only exacerbate its danger to vehicles, bicyclists, pedestrians and the general public.

Response R207-4

As part of the Final EIR, Tennessee Avenue was removed from the priority NEN. The MP 2035 EIR is a programmatic document that addresses impacts at an Area Planning Commission level based on preliminary conceptual level information. The traffic analysis for the project did not perform an intersection-level of analysis, and the project is not proposing a traffic signal at the intersection of Tennessee and Westwood. As projects are designed more detailed analysis will be undertaken, but such analysis is not possible at this time since design details are not available. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-5

Additional intersection protections for all modes of transport would be needed. It should be noted, however, that in no case is a traffic signal acceptable at Overland and Olympic. That scenario was evaluated at one point in the past and the neighborhood did not support it as it would have resulted in added cut-through traffic in the area.

As noted by the West of Westwood Homeowners Association, Manning Avenue has no signal at Olympic Boulevard and adding one at that location will vastly impede ingress and egress from Century City in the AM and PM peak hours. It will also open up that street and the adjoining streets to significant cut-through traffic which is unacceptable. We therefore object to bike lanes on Manning and all of the above streets.

Response R207-5

The intersection of Overland and Olympic already has a traffic signal. The intersection of Overland and Manning is not signalized and the MP 2035 is not proposing the installation of a new traffic signal at this location. As projects are designed more detailed analysis will be undertaken, but such analysis is not possible at this time since design details are not available. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-6

It is unfortunate that a process could not have been implemented that involved the community in identifying alternative routes. We understand the importance of establishing safe passage for bicycles to get to and from major destinations. We also know that our constituents do not feel safe riding a bike on busy streets such as Westwood or Pico Blvds. Much additional work is needed with the community to identify alternatives that will provide safe passage for bike commuters as well as local residents who wish to leave their cars behind when possible.

Response R207-6

See **Master Response 6** for the EIR analysis and conclusion regarding public participation, **Master Response 10** for the EIR analysis and conclusion regarding Westwood Boulevard, **Master Response 17** for the EIR analysis and conclusion regarding Olympic Boulevard, **Master Response 19** for the EIR analysis and conclusion regarding the implementation of the enhanced networks, and **Master Response 12** for the EIR analysis and conclusion regarding project alternatives.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-7

We suggested an analysis of the Elevated Veloway that was proposed many years ago by some members of the UCLA community. Was that project evaluated and reviewed for its potential? Again, we seek to stress the need for safe bicycle facilities. What is the data that has been compiled on existing bike lanes (and for the northern areas of the Westwood Blvd. lane)?

Response R207-7

The elevated Veloway was not evaluated as part of the MP 2035; the Veloway is not currently foreseeable as reasonably feasible. The EIR is a programmatic-level document. Data on existing bicycle lanes for individual roadway segments was not collected as part of the project. As individual projects are considered, additional data will be provided and project-level impacts will be addressed at that time under a separate undertaking. The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

The implementation of bicycle facilities associated with the MP 2035 is anticipated to improve safety and health outcomes for bicyclists and other road users. **Master Response 13** provides information for the EIR analysis and conclusion on bicycle safety.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-8

We remain concerned that even if Los Angeles were to have an increase in bicyclists to Portland Oregon figures, it would still be a difficult case to be able to rationalize the removal of traffic lanes in settings where there are few vehicular alternatives.

Response R207-8

See **Master Response 1** regarding the traffic impact methodology, and **Master Response 19** for the EIR analysis and conclusion on the development and implementation of the MP 2035. **Master Response 15** provides information for the EIR analysis and conclusion on legislative changes under SB 743 and transportation performance metrics. See **Master Response 22** for an explanation of why the scope/level of analysis in the EIR is appropriate. When proposed project-specific details come forward, a more detailed specific intersection analysis would be conducted. See **Master Response 19** for a discussion of future projects and the requirements for environmental review.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-9

Our main concern has to do with the Mobility Plan's recommendation that a traffic lane in each direction on Sepulveda be removed to accommodate for a bus lane. Having recently observed a bus stuck behind a bike in a shared lane (and the bike rider did not defer or pull over to allow the full bus with two bikes mounted in front to pass). Further, our community members have clearly stated that they do not feel safe riding with buses on the City streets. We do not recollect seeing any mention of the fact that Sepulveda is a designated 405 freeway alternate route. What freeway? At the current time, vehicular traffic on the 405 and Sepulveda migrate from one to the other depending on roadway conditions on those arterials. To restrict traffic volumes on either of those roadways would send traffic onto already overcrowded and winding canyon roads in residential areas. That would not bode well for the City's goal of reduce traffic fatalities and injuries. Sepulveda is a street crying out for improvements. It is the street where the City should begin the community's involvement in the re-write of the

community plan. Such an exercise would provide all stakeholders with the opportunity to become familiar with the tasks involved with the creation of a new neighborhood plan and would begin the WLA process in earnest. All are aware that Sepulveda (like Lincoln Blvd. in the Venice area) has much unrealized potential that has not been explored adequately to date.

Response R207-9

As stated in **Chapter 1.0 Introduction** and **Section 4.1 Transportation, Parking and Safety** of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles' Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions. See **Master Response 1** regarding the traffic impact analysis methodology. The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-10

We continue to be troubled by the “wishful thinking” demonstrated in this document. The eMobility Element is meant to be an objective analysis of alternatives – not an advocacy tool. There is a need to dig deeper and perform the types of analysis that acknowledge the current weaknesses in infrastructure, the City's ability to address those issues and the impacts of the proposed scenarios. While some planners suggest that planning be done to model what we want to see, one must understand the current situation and build a tangible set of strategies – a BRIDGE- to go from point A (where we are now) to the next point down the road.

Response R207-10

See **Master Response 1** regarding the traffic impact methodology. The City is required to undertake long-term planning in accordance with applicable legislation and reasonably foreseeable conditions. The City must address various requirements to reduce VMT, GHGs and accommodate population growth. Business as usual is not an option. The MP 2035 is an effort to address the constraints that are reasonably foreseeable over the timeframe of the plan. The Department of City Planning undertook extensive public outreach during the formulation of MP 2035 (see **Master Response 6**). The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership. See **Master Response 19** for the EIR analysis and conclusion regarding implementation of the Enhanced Networks. See also **Response R200-1** for the EIR analysis and conclusion of analysis and infrastructure.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-11

For each of the streets above, a doubling of bus services is being put forward. We take issue with the fact that a one-size fits all approach of doubling bus services has been applied to every street on the TEN list for our area. Once again, this points to a lack of study and planning as to what the needs of the area actually are. It seems it is in the realm of possibility that more, less or no change to bus services will be necessary, but plans seem to have been devised without actual facts or projections on the ridership associated with each street. Table 4.1-26 covers ridership for the entire West LA area. It sites an increase in riders from a current 19,100/day to 50,900/day. We have questions on the specific modeling techniques performed to achieve such a projection. Moreover, the DEIR says the model-estimated changes “do not account for additional changes in demographics, vehicle ownership patterns, energy prices, and migration to walkable and transit-served locations.” These factors may be difficult to quantify, but can totally change ridership projections. At the least, further study and planning should be done incorporating such factors into the ridership data. Multiple models should be evaluated and compared (rather than just using one) so changes under different conditions can be looked at given estimations can be unpredictable over a twenty year period. Referring to our earlier comment, this discussion highlights the perils of attempting to plan ahead to the year 2035 based upon our current knowledge and the many unknown variables associated with the buildouts of major transit facilities.

Response R207-11

See **Response 207-10** regarding need for the MP 2035. The MP 2035 EIR is a programmatic document that addresses impacts at an area level based on preliminary conceptual level information. As stated in **Chapter 1.0 Introduction** and **Section 4.1 Transportation, Parking and Safety** of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles’ Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions. Consequently, certain assumptions such as the frequency of transit service with the implementation of the TEN needed to be estimated at a Citywide scale. As projects are designed more detailed analysis will be undertaken, but such analysis is not possible at this time since design details are not available. See **Master Response 1** regarding the traffic impact analysis methodology. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-12

The TEN proposals to eliminate vehicular travel lanes and replace them with bus only lanes do not make sense for the streets identified. Pico is bumper to bumper during rush hour. It is also a major route taking Century City traffic to the I-10 and 405 freeways. If a vehicle lane is removed, then worse traffic flow will ensue. Sepulveda is two lanes, so if a traffic lane is removed, that means there will be only one lane for vehicles on this major thoroughfare. Sepulveda is the alternative to the 405 Freeway and we do not believe it makes sense to reduce it to a single lane. Santa Monica Blvd was designed as a high speed funnel for cars whisking to the Century City area. On Santa Monica, bottleneck occurs the closer you get to the 405. It is not clear the reason a bus only lane is being put forward for the street and we request the City provide justification for its proposal. A GREAT deal of planning went into the Santa Monica Blvd. Multi Modal project that was completed not long ago. If a bus only lane was to be implemented, the time to have done it was when the physical alterations were being done to the roadway. (Just as transit should have been incorporated into the 405 project in the Sepulveda Pass. But, we digress.)

Response R207-12

As stated in **Chapter 1.0 Introduction** and **Section 4.1 Transportation, Parking, and Safety** of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles' Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions. See **Master Response 1** regarding the traffic impact analysis methodology. The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-13

Removal of all parking will bring traffic to the curb and since there is a very very small parkway on Olympic, it will place pedestrians in extremely close proximity to the speeding cars. We work hard to encourage parents and their children to walk or bike to the local elementary school – Westwood Charter

Response R207-13

Master Response 3 has additional information for the EIR analysis and conclusion regarding the loss of parking. **Master Response 17** has information for the EIR analysis and conclusion on the enhanced network treatments on Pico and Olympic Boulevards. See **Master Responses 19** and **22** regarding project implementation and EIR scope/level of review. See **Master Response 24** regarding safety for pedestrians and other vulnerable populations.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-14

*The City's policy of requiring street widening as a part of a project's entitlement process **WHETHER OR NOT SUCH IMPROVEMENTS COULD EVER BE CONTINUED DOWN THE BLOCK** is another policy that degrades the pedestrian experience. Improving infrastructure is supported, but only when it is understood that "improvements" are not another way of rationalizing the removal of parkways, mature trees, etc. If anything, the City must pursue more active tree planting activities on all streets and should recognize its responsibility not only to plant trees, but to maintain them as well.*

Response R207-14

The project includes limiting future roadway dedications to existing widths, with the exception of potential expansions for pedestrian facilities (see **Table 3-3** in **Chapter 3.0 Project Description** for the new street designations). To accommodate street widening that could potentially encroach on existing private parcels, roadway dedications would be required upon redevelopment of each parcel. Because of the uncertainty of timing for redevelopment, it is anticipated that the widening would occur on a block by block basis over substantially extended timeframes, likely beyond the horizon year of the plan to implement all the widenings identified in the plan. Aesthetic improvements to maintain pedestrian character would also occur on a block

by block basis in tandem with the proposed widenings. Roadway dedications would, at a minimum, maintain existing sidewalk dimensions, and in many cases increase sidewalk dimensions based on the volumes of pedestrians. The specific sidewalk dimensions and aesthetic treatments would undergo additional environmental review when detailed geometric designs, traffic volumes, pedestrian volumes become available. See also **Response 200-11** regarding the recent lawsuit settlement requiring the City of Los Angeles to spend more than \$1.3 billion over the next three decades to fix the backlog of broken sidewalks.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-15

The fact that the DEIR is called a mobility plan, but proposes changes that increase congestion and decrease mobility is curiously mind boggling.

Response R207-15

See **Master Response 1** regarding the traffic impact methodology being vehicle-centric and conservative and **Master Response 11** for the EIR analysis and conclusion regarding the development of the MP 2035, **Master Response 15** for the EIR analysis and conclusion regarding transportation performance metrics, and **Master Response 19** for the EIR analysis and conclusion on the implementation of the enhanced networks.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-16

Additionally, it is confusing that the City is proposing to create streets that knowingly impede emergency access. Police and Fire already have issues with reaching their destinations during peak hours. Roads should be designed to improve access, not purposely curtail it.

Response R207-16

See **Master Response 1** regarding the traffic impact methodology being vehicle-centric and conservative and **Master Response 14** for the EIR analysis and conclusion regarding emergency access and response times. The EIR determined that a potentially significant and unavoidable impact would result to emergency access and response times.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-17

As to the bus service increases, the City needs to take steps for better mitigations to protect the quality of life for people in the area. It is likely that peak hour speeds will decrease with vehicular lane removals, thus increasing greenhouse gas emissions of all vehicular types.

Response R207-17

See **Response R200-7** regarding GHG emissions. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-18

We believe the DEIR is wrong to state that it is not anticipated the proposed project would change truck speeds to the extent that associated emissions would result in substantial additional exposures of sensitive receptors. We think that the proposed plans will precisely reduce mobility to a standstill, increasing exposures.

Response R207-18

See **Response R201-5** regarding exposure to air pollutants. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-19

The DEIR says mitigations are not required, but that does not mean that they should not occur. We maintain mitigations are warranted and necessary. With regard to impacts on special-status species and protected habitat, more need to be done. More study needs to take place as to which species may be impacted, specifically keeping in mind migratory bird patterns, which are not always predictable.

Response R207-19

Under CEQA, mitigation measures are required to reduce significant impacts below a level of significance or if that is not possible to the greatest extent feasible. Where no significant impacts occur, no mitigation measures are required. Design features and best management practices, which typically reduce potential effects can be implemented at the discretion of the lead agency. The plan is programmatic in nature and the EIR analyzes impacts at a very broad level, without the benefit of detailed design for specific improvements. See **Master Response 22** related to the scope/level of analysis. The specific issue of special species and protected habitat is site specific and project specific in nature. As projects are implemented with specific geometric designs, traffic volumes, pedestrian volumes, biological considerations will be definitively implemented as part of subsequent environmental review. At this stage in the planning process, it is appropriate for this program EIR to identify the potential for significant impacts to biological resources to ensure that further environmental review is required when the necessary design and operation details are available.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-20

Due consideration for construction impacts also need to be given greater attention. Additional impacts of concern include noise, slowed traffic delays, air quality issues and parking problems. More details are also

needed on how TENs, PENs, NENs, VENs and BENs might have cumulative impacts on one another, as well as how other projects in the area (planned and unplanned) may have cumulative effects with this project. There has been a historic lack of strategic planning in the city as one development project after the next appeals to the City Council for zoning variances. The result is a hodgepodge of clashing projects with reduced quality of life for Angelenos. This ad hoc approach leaves questions as to how future commercial developments will impact the currently proposed project.

Response R207-20

Section 4.1 Transportation, Parking and Safety of the EIR discusses the potential construction-related impacts of the MP 2035. As stated, construction-related impacts generally would not be considered significant due to their temporary and limited duration. Implementation of on-street improvements related to the enhanced networks would mostly consist of roadway restriping and limited changes to the physical configuration of curbs, and thus, would likely be short in duration lasting up to a few weeks. Therefore, temporary and short-term construction related impacts would occur; however, these impacts would be less than significant. Mitigation Measure **T6** was provided to effectively manage the construction activities on the MP 2035.

The effects of the components of the MP 2035 have been addressed through use of a comprehensive City-wide travel demand model. For additional information on the model, see **Master Response 1** and **Appendix C** for additional information on model growth and networks. One of the major benefits of the model is that it is able to quantify changes to all of the enhanced networks, when one of the enhanced networks is changed or modified. The use of the transportation model has enabled the mobility plan to optimize the regional transportation network (while at the same time being vehicle-centric and conservative) with the least disruption to the existing vehicular network. Without this tool, it would be difficult, if not impossible, to validate whether changes to the networks would have a greater or lesser cumulative effect. The model has also been varied to account for various combinations of the various MP 2035 components in the assessment of alternatives. As such, on a programmatic basis, the interaction and interrelationship between the plan components has been addressed.

The right to appeal project approvals and environmental decisions is part of the City's process. Approval decisions and weighing environmental impacts against project benefits is the responsibility of the elected officials (City Council). See **Master Responses 1, 2, 4, 11, and 22** discussing analysis of traffic impacts, air quality and noise from the project, including the identification of significant and unavoidable impacts to transportation and noise and the need for a statement of overriding considerations.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-21

The alternatives presented in the DEIR are limited in scope and consideration. The alternatives the City is contemplating can be reduced and surmised as the addition of fewer bike lanes and/or transit only lanes. The limited depth associated with considering alternatives really needs to be highlighted because increasing mobility in Los Angeles is going to require a larger range of considerations given we have the worst traffic in the country. There needs to be a more robust conversation about the full range of plausible alternatives for enhancing mobility.

Response R207-21

See **Master Response 12** for the EIR analysis and conclusion regarding project alternatives. The comments will be provided to the decision-maker regarding the need for a more "robust conversation." The commenter

provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR, or the City's alternative analysis. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-22

It is our understanding that the EIR must provide substantial evidence that, for example, bike paths and bike lanes are safer than existing conditions. The EIR does not provide evidence that justifies such a conclusion so far as we can see. We have already advocated for taking an approach that promotes quality bike installations, not quantity. Quality lanes are protected lanes.

Response R207-22

The EIR does not identify a potentially significant impact on safety as a result of bicycle lanes. The EIR does not have to prove that something is "safer" or better than existing conditions, just that it does not create a potential significant environmental impact. The implementation of bicycle facilities associated with the MP 2035 is anticipated to improve safety and health outcomes for bicyclists and other road users. **Master Response 13** provides information for the EIR analysis and conclusion on bicycle safety.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-23

(A) Safety First, (B) World Class Infrastructure, (C) Access for all Angelenos, (D) Collaboration, Communication & Informed Choices, and (E) Clean Environment and Healthy Communities. We would like to put forward that the proposed project fails with respect to most of these goals. We feel that safety is being compromised by additional congestion. The quantity instead of quality approach does not point to world class infrastructure and limits access for Angelenos. Finally, more congestion means a less clean environment and less healthy community.

Response R207-23

See **Master Response 11** regarding development of the project and the goals and objectives and **Master Response 15** for the EIR analysis and conclusion regarding transportation performance metrics. Safety is addressed in **Section 4.1 Transportation, Parking and Safety**. See also **Master Response 1** regarding the traffic impact assessment methodology.

The proposed project would have a significant impact if it would substantially change transportation safety. CEQA guidelines broadly define a safety impact threshold as "substantially increase hazards due to a design feature (sharp curves or dangerous intersections) or incompatible land uses (farm equipment). The MP 2035 does not include specific design features or modify land uses that are expected to be incompatible with safe transportation operations. See **Master Response 4** for the EIR analysis and conclusion regarding potential air quality effects and **Master Response 2** for the EIR analysis and conclusion regarding effects to quality of life.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-24

For these reasons, we oppose this project as proposed and request that the City work directly with the community to develop a plan that enhances mobility for Angelenos, as opposed to attempting to engineer a social revolution. Changes in culture are best made through an evolutionary process, not a revolutionary one. Already, we have seen much too much of an “us vs. them” mindset take hold. The Planning Dept. should be encouraging an all inclusive “win-win” philosophy that seeks to empower community members and reward them for working together. While the models we see in our state and federal legislatures suggest that grandstanding and opposing compromise are the “flavors of the day,” we can and must do better in our local communities. We must demonstrate that local government can be and is responsive to its constituents in a responsible and respectful manner. When it comes to the Mobility Element, it is incumbent upon the City and its departments to demonstrate that they are truly trying to address the challenges faced by all Angelenos. I fear, instead, that the message being sent is that the City will engineer these plans however possible to rationalize new construction and the upzoning of all parts of the City in a wholesale campaign not unlike the old urban renewal initiatives.

Response R207-24

The 2008 Complete Streets Act is a legal requirement which mandates that the circulation element of the General Plan be modified to plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban, or urban context of the general plan. See **Master Response 6** for the EIR analysis and conclusion regarding public participation. **Master Response 19** for a discussion of future projects and the requirements for environmental review. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-25

The adoption of a Scenic Roadway plan for Santa Monica Blvd. This is extremely important so that the roadway can have protections above typical roadways. This historic Route 66 roadway needs protections from any attempt to locate additional billboards (traditional or digital/electronic). These signs are extremely distracting and diminish both the safety of those using the street (ped, bikes, drivers, passengers), but they also change the nature of the street and the character of the neighborhood. We seek attention paid to the need to adopt standards to promote beautification of Santa Monica Blvd. and to protect it from blight and protect drivers/all users from the dangers of accidents caused by distraction.

It would be very important to have this Mobility Plan adopt a policy that would keep digital billboards and digital changing onsite signage off of streets and arterials that have high volume traffic. While these are exactly the types of streets that the outdoor advertising industry covets for their signage, those are the crowded streets where a split section of distraction can result in an accident.

Response R207-25

The EIR does not identify a potential significant impact with respect to blight given the available conceptual information. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-26

Because safety is a key concern for all of us, it is important for us to understand the results of an analysis of current data and cumulative projected data related to emergency response times for changes in street configurations. While we have been told by planning staff that public safety will improve as a result of the purposeful slowing of traffic on our major arterials (because a person or bicycle or victim in an accident is less likely to be killed at slower speeds), we cannot help but wonder if one unevaluated impact of slowing traffic will result in the failure of first responders to get to accident victims and those in need of medical attention. There has already been documentation about LAFD's challenges in meeting acceptable response times. What happens when the streets are further (and intentionally) slowed?

Response R207-26

The EIR evaluated potential impacts to emergency access vehicles and determined that a potentially significant and unavoidable impact would result. See **Master Response 1** regarding the traffic impact assessment methodology and **Master Response 14** for the EIR analysis and conclusion regarding emergency vehicle access and response times.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-27

On another important matter: Now that the State no longer mandates the reporting of LOS as part of environmental review and instead seeks to rely upon VMT with the goal to reduce VMT, we would like to strongly suggest that the City continue to require traffic studies to include assessments of BOTH LOS and VMT - at least for an introductory three to five year period while the initial data measuring VMT can be compiled and a reliable methodology adopted. While reduction in VMT is important and one of the keys to reducing greenhouse gases, it is conceivable to actually reduce VMT but increase congestion at key intersections and, in doing so, cancel out any advantage/gain in reduced greenhouse gases in the ensuing congestion created (but not acknowledged if LOS studies go away). We have years of solid data on LOS that has been helpful in assessing project impacts and in designing mitigations. That history and that tool should not be lost especially when the new measure is one that is untested.

Response R207-27

The requirement to address LOS as part of environmental documents has not been removed to date, although that is the direction that the Guidelines are headed. Even if CEQA Guidelines remove the requirement to address vehicle delay as part of the CEQA process, communities may choose to consider delay impacts as part of the planning process. See also **Master Response 15** provides the EIR analysis and conclusion on the legislative changes discussed in the above comment. MP 2035 is not proposing any changes to the methodology used to analyze project impacts as part of traffic impact studies.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R207-28

There is an article that was sent to me by Bill Pope and in it there is a good discussion about the importance of reducing congestion. That topic was not adequately addressed in the Mobility Plan.

I am submitting portions of that article to you as follows for the file/record and for your attention to the points raised:

Response R207-28

See **Master Response 1** regarding traffic methodology and congestion. The environmental effects of increased vehicular congestion were analyzed throughout the EIR (**Sections 4.1 Transportation, Parking and Safety, 4.2 Land Use and Development, 4.3 Air Quality, and 4.5 Noise and Vibration**).

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. R208

Marilyn Tusher
Westwood Gardens Civic Association

Comment R208-1

Transit Enhanced Network (TEN) – We oppose the TEN changes that have been put forward for our community and are completely against the conversion of vehicle travel lanes to bus only lanes for the streets suggested. The DEIR outlined the following changes:

- *Westwood Blvd – Moderate (all): Double frequency of bus service.*
- *Pico – Moderate Plus (all): Convert one vehicular travel lane per direction to a bus only lane during peak periods; Double frequency of bus service.*
- *Sepulveda – Comprehensive (all): Convert one vehicular travel lane per direction to a bus only lane for the full day; Double frequency of bus service.*
- *Santa Monica – Comprehensive (405 to passed Beverly Glen): Convert one vehicular travel lane per direction to a bus only lane for the full day; Double frequency of bus service.*

On behalf of our Board of Directors we are completely opposed to any increase of the bus service on Westwood Blvd. This narrow street from Pico to the 10 Freeway is fronted entirely with single family homes, and runs through the heart of our residential community. At present there are already 3 separate bus lines servicing this area, with adequate schedules to accommodate the public. Our homeowners along this portion are already subject to the noise, pollution, frequency and heavy vibration from these buses that are in service. In some portions these homeowners have already lost any buffer and protection that they may have had from these buses due to the construction of the Expo II line and the removal of parkway, parking and trees. We are totally opposed to any increase in their numbers or frequency. Our homeowners do not need any more such intrusion into the peaceful enjoyment of their homes, or to any further detriment of their quality of life.

Response R208-1

The potential air quality, noise and vibration effects from the implementation of increased bus frequency are analyzed in the EIR. See also **Master Response 4** regarding air quality effect for the proposed project. The EIR determined that no significant effects to air quality and vibration would result from the doubling of bus frequency on the TEN. Depending on project specifics, a bus only lane could increase transit-related noise levels by more than 3 dBA at sensitive land uses. This would result in a substantial permanent increase in ambient noise level in the project vicinity above levels existing without the project. Therefore, the EIR determined that a significant noise impact related to bus frequency would occur with implementation of the proposed project. See **Master Response 2** for the EIR analysis and conclusion regarding additional effects to quality of life.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R208-2

For each of the other streets above, we understand that a doubling of bus services is being put forward. However, we take issue with the fact that a one-size fits all approach of doubling bus services has been applied to every street in the TEN area. Once again, this points to a lack of study and planning as to what the needs of the area actually are. It seems it is in the realm of possibility that more, less or no change to bus services will be

necessary, but plans seem to have been devised without actual facts or projections. Further study and planning are needed, which the DEIR did not include.

Response R208-2

See **Master Response 1** regarding the traffic impact assessment methodology. The MP 2035 EIR is a programmatic document that addresses impacts at an area level based on preliminary conceptual level information. As stated in **Chapter 1.0 Introduction** and **Section 4.1 Transportation, Parking and Safety** of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles' Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions. Consequently, certain assumptions such as the frequency of transit service with the implementation of the TEN needed to be estimated at a Citywide scale. As projects are designed more detailed analysis will be undertaken, but such analysis is not possible at this time since design details are not available. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. R209

Aaron Rosenfield
West of Westwood Homeowners Association

Comment R209-1

Please accept the following comments as part of the record for ENV 2013-0911-EIR concerning the 2035 Mobility Plan for the City of Los Angeles. These comments are being submitted by the West of Westwood Homeowners Association (HOA) Board of Directors on behalf of approximately 1,200 households in the Rancho Park area. These comments are in addition to the comments we sent to you on April 29, 2013.

While we appreciate the City listening to our comments and removing Westwood Blvd from the Bicycle Enhanced Network list, the current plan being circulated has met our community with a great deal of opposition. The DEIR is called a Mobility Plan, yet the report openly states that the project will result in “significant and unavoidable” impacts associated with “increased congestion”. Los Angeles does not need to be paying for projects that will create more congestion. It simply makes no sense. Looking specifically at the changes slated for our neighborhood, it seems the proposals once made for Westwood Blvd have been shifted onto other area streets. Like Westwood Blvd, these other streets are not meant to handle the capacity being planned and our continued opposition to the changes stems from identical reasoning to which we have stated previously. In many cases, the DEIR plans are broad and non-specific, leaving questions as to whether proper due diligence has been utilized in the formation of an adequate plan for improvements. The following are our specific remarks pertaining to changes proposed for our neighborhood.

Response R209-1

The comments are part of the record. See **Master Response 1** regarding the traffic impact assessment methodology, **Master Response 11** regarding the development of the MP 2035, **Master Response 15** for the EIR analysis and conclusion regarding transportation performance metrics, and **Master Response 19** for the EIR analysis and conclusion regarding the implementation of the enhanced networks. The plan is programmatic in nature and addresses change issues at a very broad level, without the benefit of detailed design for specific improvements. The focus of the plan is on changes to street function and capacity to accommodate and balance all modes. As projects are implemented with specific geometric designs, traffic volumes, pedestrian volumes, additional considerations will be addressed as information becomes available. At this stage in the planning process, it is appropriate for this program EIR to identify that impacts to congestion will be significant and will be further addressed when the necessary design and operation details are available. See **Master Response 22** discussing the scope/level of project review.

The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-2

(1) *Bicycle Enhanced Network (BEN) - The proposal includes bicycle enhancements for the following streets:*

- *Veteran (Expo to Santa Monica).*
- *Manning (Santa Monica to almost Pico).*
- *Tennessee (Veteran to Manning).*

We object to bike lanes on all of the streets above on several grounds. First, we understand that adding bike lanes will often require the removal of parking or vehicle travel lanes, which we do not support. The aforementioned streets already have limited parking and vehicular flow. Using Veteran as an example, parking is limited to one side of the street already and there is only a single travel lane in each direction. In our view, there is simply no room for a bike lane. Residents in our community would be majorly impacted by

such a change in terms of a loss of parking and increased traffic. Second, several of the streets do not allow for continuous and unimpeded flow of bike traffic. For example, Manning does not have a signal at Olympic Blvd and Tennessee does not have a signal at Westwood Blvd. It is unclear how bike traffic is going to get across these intersections and we are concerned for the safety of both motorists and bikers. Third, creating miles of bike lane quantity is not what the city needs.

Response R209-2

As part of the Final EIR, Veteran and Tennessee Avenues were removed from the priority NEN. **Master Response 20** provides additional information on the types of treatments that would be implemented as part of the NEN. The implementation of the Enhanced Networks would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership. The MP 2035 EIR is a programmatic document that addresses impacts at an APC level based on preliminary conceptual level information. The traffic analysis for the project did not perform an intersection-level of analysis, and the project is not proposing a traffic signal at the intersections mentioned in the comment. As projects are designed more detailed analysis will be undertaken, but such analysis is not possible at this time since design details are not available. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035 and **Master Response 22** on the scope/level of EIR analysis. The commenter's opinions on the needs of the city will be forwarded to decision-makers for their consideration in taking action on the project.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-3

We need quality bicycle infrastructure that is not only a complete network, but is safe for your average Angelino to traverse. Your average Angelino will not make the decision to exchange a bike for a car if the discussion continues to be a dichotomy between the two. One or the other should not be the option, as most people would like the choice of which method of transport best suits their specific needs. If the City seriously wants to encourage biking, it has to give people the choice not by making cars less attractive via the removal of vehicular lanes and increased congestion, but by making bikes a more attractive means of safe and easy transport. This is best done by the complete redesign of key streets that includes the addition of protected lanes for bikers to use.

Response R209-3

The implementation of the MP 2035 would be consistent with the design treatments in the City's Complete Streets Design Guide: Great Streets for Los Angeles. The guide contains roadway design features, such as sidewalk dimensions, for each roadway designation. See **Master Response 1** regarding the traffic impact assessment methodology. See **Response R200-17** for information on Complete Streets and their goal of providing safe and efficient transportation for pedestrians (especially for vulnerable users such as children, seniors and the disabled), bicyclists and transit riders.

The implementation of bicycle facilities associated with the MP 2035 is anticipated to improve safety and health outcomes for bicyclists and other road users. **Master Response 13** provides information for the EIR analysis and conclusion on bicycle safety.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-4

The 2010 City of LA Bike Plan proposes a bike lane for Sepulveda. In our scoping comments, we put forward Sepulveda Blvd as the best candidate for north/south bicycle flow. Completing a bicycle network on Sepulveda between Venice Blvd and Santa Monica Blvd would result in a route that connects Palms with Rancho Park, UCLA (via Westwood Blvd north of Santa Monica Blvd) and Century City (via Santa Monica Blvd). Further, Sepulveda is one of the only plausible routes that bikers could use to go from the Westside to the Valley, a key connection that makes sense. Sepulveda does not have to cross the light rail line at grade, yet it still connects with the rail station (at Sepulveda) and the east/west Phase II bikeway that is being built. We support building protected bike lanes on Sepulveda and would like to see it done without the removal of vehicle lanes.

Response R209-4

Sepulveda Boulevard is designated as part of the TEN and also has a planned bicycle lane per the 2010 Bicycle Plan as noted in the comment. The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-5

We also support protected bike lanes on Santa Monica Blvd because of the huge width of the street and the fact that bike lanes already exist on much of the boulevard. We think making protected lanes and extending the network to Wilshire Blvd (the Beverly Hills border) would only help to increase ridership as it would create a safe network for area riders.

Response R209-5

Santa Monica Boulevard is designated as part of the BEN between Westwood Boulevard and the City border with Beverly Hills.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-6

(2) *Transit Enhanced Network (TEN) – We oppose the TEN changes that have been put forward for our community and are completely against the conversion of vehicle travel lanes to bus only lanes. The following streets were proposed for changes in the DEIR:*

- *Westwood Blvd – Moderate (all): Double frequency of bus service.*
- *Pico – Moderate Plus (all): Convert one vehicular travel lane per direction to a bus only lane during peak periods; Double frequency of bus service.*
- *Sepulveda – Comprehensive (all): Convert one vehicular travel lane per direction to a bus only lane for the full day; Double frequency of bus service.*

- *Santa Monica – Comprehensive (405 to passed Beverly Glen): Convert one vehicular travel lane per direction to a bus only lane for the full day; Double frequency of bus service.*

For each of the streets above, a doubling of bus services is being put forward. We take issue with the fact that a one-size fits all approach of doubling bus services has been applied to every street on the TEN list for our area. Once again, this points to a lack of study and planning as to what the needs of the area actually are.

Response R209-6

Refer to **Response R207-11** for the EIR analysis and conclusion on the traffic analysis methodology and analysis inputs. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-7

It seems it is in the realm of possibility that more, less or no change to bus services will be necessary, but plans seem to have been devised without actual facts or projections on the ridership associated with each street. Table 4.1-26 covers ridership for the entire West LA area. It sites an increase in riders from a current 19,100/day to 50,900/day. We have questions on the specific modeling techniques performed to achieve such a projection. Moreover, the DEIR says the model-estimated changes “do not account for additional changes in demographics, vehicle ownership patterns, energy prices, and migration to walkable and transit-served locations.” These factors may be difficult to quantify, but can totally change ridership projections. At the least, further study and planning should be done incorporating such factors into the ridership data. Multiple models should be evaluated and compared (rather than just using one) so changes under different conditions can be looked at given estimations can be unpredictable over a twenty year period.

Response R209-7

The updated City of Los Angeles TDF model was used to generate the baseline and future conditions data for MP 2035. Given the programmatic nature of the impact analysis and large study area, the City’s TDF model reflects the most recent and applicable data at a Citywide level to report baseline and future transportation characteristics, including transit ridership projections. Through the model updates outline above, the City’s TDF model is consistent with the growth and transportation improvements in the adopted 2012-2035 RTP/SCS, which reflects both the City of Los Angeles and SCAG region. Potential changes in demographics, vehicle ownership patterns, energy prices and migration to walkable and transit-served locations cannot be quantitatively modeled without making a variety of assumptions about the future state of the City and region, which are too speculative to be modeled at this time. The future forecasting assumptions reflect a worst case analysis of potential levels of congestion for vehicles with the implementation of the MP 2035. No other model has been identified by the City and its traffic consultants that would provide more reliable analysis or conclusions. See **Master Response 1** regarding the traffic impact assessment methodology, and **Response R207-11** for the EIR analysis and conclusion on the traffic analysis methodology and analysis inputs. See **Master Response 19** for the EIR analysis and conclusions regarding the implementation of the enhanced networks and future modeling/analysis of projects as part of the MP 2035.

The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR, including as to the need to use different models. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-8

The TEN proposals to eliminate vehicular travel lanes to put in bus only lanes do not make sense for the streets above. Pico is bumper to bumper during rush hour. If a vehicle lane is removed, then worse traffic flow will

ensue. Sepulveda is two lanes, so if a traffic lane is removed, that means there will be only one lane for vehicles on this major thoroughfare. Sepulveda is the alternative to the 405 Freeway and we do not believe it makes sense to reduce it to a single lane. Santa Monica Blvd was designed as a high speed funnel for cars whisking to the Century City area. On Santa Monica, bottleneck occurs the closer you get to the 405. It is not clear the reason a bus only lane is being put forward for the street and we request the City provide justification for its proposal.

Response R209-8

See **Master Response 1** regarding the traffic impact assessment methodology and the identification of a significant and unavoidable impact related to removal of vehicle lanes and **Response R207-12** for the EIR analysis and conclusion on the traffic impact analysis and implementation of the MP 2035.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-9

(3) *Pedestrian Enhanced Network (PEN) – In our scoping comments, we said that we are “likely to support most Pedestrian enhancements the City puts forward, so long as they don’t result in negative impacts being created.” Given what we feel is a general lack of study regarding changes to the area, we are skeptical about what the City would like to do in this respect. The following streets have been put forward as PENs for the area, but once again specific proposals for these streets were not outlined in the DEIR for which we can directly comment on:*

- *Westwood Blvd (all).*
- *Olympic (most).*
- *Pico (Overland to Sepulveda).*
- *Overland (patches Santa Monica to National).*
- *Veteran (just south of Santa Monica).*
- *Sepulveda (patches Santa Monica to National).*
- *Manning (patches between Santa Monica and Pico).*

Our sidewalks are in horrible condition. Improving infrastructure is supported, but we are concerned improvements will mean the elimination of vehicle lanes, parking, trees, etc. We would like to see improvements, but not at the expense of losing other amenities. We support the idea of way-finding and greening of the community through the addition of trees.

Response R209-9

See **Response R209-1** regarding details for site specific effects. Improvements to the Pedestrian Enhanced Districts would not result in the elimination of vehicle lanes or parking. The exact nature of improvements and amenities will be defined and analyzed as detailed design becomes available, but will be developed to improve the overall pedestrian experience. See also **Response 200-11** for information on the City’s agreement to fix existing sidewalk deficiencies. See **Master Response 22** discussing the scope/level of analysis in the EIR.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-10

(4) *Neighborhood Enhanced Network – NENs are proposed for the following streets:*

- *Olympic (405 to Manning).*
- *Constellation (405 to past Manning).*
- *Veteran – Priority (all).*
- *Manning – Priority (all).*
- *Tennessee (405 to passed Beverly Glen).*

The exact reasoning for the inclusion of the streets above in the NEN was not stated in the DEIR. We understand the NEN is linked to the BEN, and presume it to be the reason Veteran, Manning and Tennessee are proposed as NENs. However, we should not have to presume why any streets are included or not, it should be spelled out so that the public has an opportunity to fully review the proposed plans. We are being deprived of this privilege. For such a reason, we oppose any changes to the above until we have more information as to what the City would like to do on each street.

We are concerned that Veteran, Manning and Tennessee are being slated for major development. It is hard to accept that the City may want to install things like mini traffic circles, neckdowns, chicanes, speed tables and diagonal diverters on these tiny streets. It is problematic that the Traffic Study in Appendix C did not cover the streets above with regard to all the intersections included in the project. We could not find traffic counts for Tennessee at all. We urge the City to please remove these streets from its plan and work to maintain their integrity as a local road network. These streets were not designed as boulevards and we do not want to see them converted into large thoroughfares. As said previously, we do not advocate for the planned changes if they result in a loss of parking or vehicle travel lanes.

Response R209-10

As part of the Final EIR, the following changes were made in the Westside area: Veteran and Tennessee Avenues were removed from the priority NEN; Santa Monica Boulevard west of Westwood Boulevard was removed from the BEN. Veteran in particular, due to its hilly condition north of Santa Monica Boulevard does not provide the most comfortable bicycling experience; and therefore, it was determined that Prosser to the west would better serve the bicycling community with a quality north-south bicycle facility. The east-west segments on Tennessee Avenue and Santa Monica Boulevard were then subsequently removed due to lack of a north-south corridor to then connect to.

See **Master Response 20** regarding the NEN. See **Master Response 1** related to methodology of transportation impacts and see **Master Response 22** for the level of analysis presented in the EIR and the conclusion that impacts to specific streets are at best speculative at this time.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-11

(5) *Vehicle Enhanced Network (VEN) – The following street is proposed as part of the VEN:*

- *Olympic – Comprehensive (all): Increase vehicle travel speeds by 10%; Add one vehicular travel lane per direction by conversion of on-street parking to vehicle travel lanes during peak periods.*

Most of Olympic Blvd is already vehicular travel lanes during peak periods, so we are unclear as to what is being proposed by this change. Given the proposal already seems to be the current state of the street, it leaves questions once again as to whether the City has properly studied the proposals it has put forward.

Response R209-11

Master Response 3 has additional information for the EIR analysis and conclusion regarding the loss of parking. **Master Response 17** has information for the EIR analysis and conclusion on the enhanced network treatments on Pico and Olympic Boulevards.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-12

The DEIR says “the proposed project would create significant and unavoidable impacts related to 1) transportation, parking and safety – increased congestion along certain routes, freeways/Congestion Management Program, neighborhood intrusion and emergency response access, 2) noise and vibration – increased ambient noise levels from increased bus frequency along certain transit routes, and 3) biological resources – potentially significant impacts related to special-status species, protected habitat, and wetlands in areas requiring acquisition outside the existing street right-of-ways due to unknown project-specific details.”

The three impacts above are of great concern to this community. The fact that the DEIR is called a mobility plan, but proposes changes that increase congestion and decrease mobility is curiously mind boggling.

Response R209-12

See **Master Response 1** regarding the vehicle-centric nature of the traffic analysis and **Master Response 11** for the EIR analysis and conclusion regarding the development of the MP 2035, **Master Response 15** for the EIR analysis and conclusion regarding transportation performance metrics, and **Master Response 19** for the EIR analysis and conclusion for the implementation of the enhanced networks.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-13

Additionally, it is confusing that the City is proposing to create streets that knowingly impede emergency access. Police and Fire already have issues with reaching their destinations during peak hours. Roads should be designed to improve access, not purposely curtail it.

Response R209-13

See **Master Response 14** for the EIR analysis and conclusion regarding emergency access and response times. The EIR determined that a potentially significant and unavoidable impact would occur to emergency access and response times. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-14

As to the bus service increases, the City needs to take steps for better mitigations to protect the quality of life for people in the area. It is likely that peak hour speeds will decrease with vehicular lane removals, thus increasing greenhouse gas emissions of all vehicular types.

Response R209-14

See **Response R200-7** for the EIR analysis and conclusion of GHG and bus movement. The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-15

We believe the DEIR is wrong to state that it is not anticipated the proposed project would change truck speeds to the extent that associated emissions would result in substantial additional exposures of sensitive receptors. We think that the proposed plans will precisely reduce mobility to a standstill, increasing exposures.

Response R209-15

As stated on page 4.3-26 of the Draft EIR, the greatest exposure concern to toxic air contaminants is associated with diesel emissions. The majority of buses operating within the City of Los Angeles are powered by alternative fuels. For example, the entire bus fleet operated by the Metro, and other bus operators, are powered by compressed natural gas. It is not anticipated that increased bus service would substantially increase diesel particulate emissions. In addition, the proposed mobility enhancements are designed to improve the flow of passenger vehicles along heavily trafficked roadways. It is not anticipated that lane conversions would change diesel-emitting truck travel patterns substantially and, therefore, the project would not significantly increase associated exposure to emissions.

CARB has published guidance related to the location of sensitive receptors near high volume roadways.⁵² The guidance states that sensitive land uses should not be located within 500 feet of urban roads with 100,000 vehicles per day. None of the surface streets associated with the proposed project have either existing volumes greater than 100,000 vehicles per day or future volumes with the lane conversion greater than 100,000 vehicles per day. Based on the CARB guidance, the traffic volumes on surface streets within the City are not high enough to result in significant exposure.

Regarding idling trucks, some intersections may experience increased delay during peak periods. The truck volumes on surface streets are relatively low compared to the volumes considered to be potentially significant by the USEPA. Westwood Boulevard, with two to three through lanes in each direction and left-turn channelization, currently carries approximately 31,000 vehicles per day north of Santa Monica Boulevard, and approximately 26,350 vehicles per day between Santa Monica Boulevard and National Boulevard (2010 Los Angeles Department of Transportation). Truck volumes are 1.3 percent of this total, equal to 350 truck trips. The U.S. Environmental Protection Agency has indicated that a Project of Air Quality Concern requires at least 10,000 diesel trucks per day.⁵³ Therefore, truck volumes along this segment would be much lower than this threshold and no significant diesel emissions would result as a result of the MP 2035. See **Master Response 4** for the EIR analysis and conclusion regarding the potential air quality effects of the project. See **Master Response 8** for additional information regarding Goods Movement.

⁵²CARB, *Air Quality and Land Use Handbook: A Community Health Perspective*, April 2005.

⁵³U.S. Environmental Protection Agency, Office of Transportation and Air Quality, *PM Hot-Spot Analyses: Frequently Asked Questions*, EPA-420-F-12-08, December 2012. A project on a new highway or expressway that serves a significant volume of diesel truck traffic, such as facilities with greater than 125,000 annual average daily traffic and 8 percent or more is diesel truck traffic.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-16

The DEIR says mitigations are not required, but that does not mean that they should not occur. We maintain mitigations are warranted and necessary.

Response R209-16

See **Response R207-19** regarding the CEQA requirement for mitigation.

Comment R209-17

With regard to impacts on special-status species and protected habitat, more needs to be done. More study needs to take place as to which species may be impacted, specifically keeping in mind migratory bird patterns, which are not always predictable.

Response R209-17

The plan is programmatic in nature and addresses change issues at a very broad level, without the benefit of detailed design for specific improvements. The specific issues of special species, protected habitat, and migratory birds are site specific and project specific in nature. As projects are implemented with specific geometric designs, traffic volumes, pedestrian volumes, biological considerations will be definitively implemented as part of subsequent environmental review. At this stage in the planning process, it is appropriate for this program EIR to identify the potential for significant impacts to biological resources to ensure that further environmental review is required when the necessary design and operation details are available. The EIR imposes mitigation and identifies impacts as significant and unavoidable.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR, including identifying feasible mitigation for the project. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-18

Due consideration for construction impacts also needs to be given greater attention. Additional impacts of concern include noise, slowed traffic delays, air quality issues and parking problems.

Response R209-18

Air quality construction impacts were assessed beginning on page 4.3-18 of the Draft EIR in accordance with guidance established by the SCAQMD. The majority of construction emissions would be related to equipment exhaust, truck trips, and worker commute trips. Detailed construction information was not available for this planning level analysis. Based on emissions estimating experience with similar projects, it was assumed that a maximum construction envelope associated with proposed enhancements could include up to four pieces of heavy-duty construction equipment operating simultaneously for eight hours per day, 25 truck trips, and 15 commute trips. Equipment engine emissions were estimated using the OFFROAD model and on-road emissions were estimated using EMFAC2014. **Table 4.3-10** on Page 4.3-18 shows the maximum estimated daily regional emissions associated with construction activity. Daily construction emissions would not exceed the SCAQMD regional significance threshold for all criteria pollutants. Therefore, the proposed project would result in a less-than-significant impact related to regional construction emissions.

Localized air quality construction impacts were assessed on page 4.3-24 of the Draft EIR. Localized impacts from on-site daily emissions associated with construction activities were evaluated for sensitive receptors

located adjacent to construction activity based on localized significance threshold guidance published by the SCAQMD. Localized significance thresholds are only applicable to NO_x, CO, PM₁₀, and PM_{2.5}. Localized significance thresholds represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or State ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor. Localized on-site emissions were calculated using similar methodology to the regional emission calculations. On-site emissions typically include equipment exhaust and fugitive dust emissions. As shown in **Table 4.3-14** on page 4.3-24 of the Draft EIR, daily construction emissions would not exceed the SCAQMD localized significance thresholds. Therefore, the proposed project would result in a less-than-significant impact related to localized construction emissions.

The greatest potential for toxic air contaminant emissions during construction would be diesel particulate emissions associated with heavy-duty equipment operations. Construction activity would occur throughout the project area and sensitive receptor exposure to construction toxic air contaminants would vary during the process; however, in general it is anticipated that construction activities in the immediate vicinity of any individual sensitive receptor would be relatively brief (in the order of a few days). In addition, the majority of construction activity associated with the proposed project would be low intensity (e.g., would not require heavy-duty equipment). Exposure to diesel particulate matter and related toxic air contaminants are anticipated to be low. Emissions would be typical for urban environments within the region, as demonstrated by the less-than-significant localized PM_{2.5} and PM₁₀ emissions. The proposed project would not generate emissions that exceed the SCAQMD thresholds of 10 in a million for the maximum incremental cancer risk or a 1.0 chronic or acute hazard index. Therefore, the proposed project would result in a less-than-significant impact related to construction TAC emissions.

Noise construction impacts were assessed beginning on page 4.5-8 of the Draft EIR in accordance with guidance established in the City of Los Angeles CEQA Thresholds Guide. Construction activity associated with the MP 2035 Enhanced Networks would mainly include reconfiguration of roadway striping and would not include excavation or construction. Limited heavy-duty equipment is anticipated to construct the proposed enhancements (e.g., small loaders for sidewalk widening or asphalt paving equipment). **Table 4.5-6** on page 4.5-9 of the Draft EIR shows the treatments associated with each enhanced network and associated degree of construction noise. Many of the treatments would have minimal, or no, construction noise. Striping activities could result in infrequent periods of high noise, this noise would not be sustained and would occur only during the temporary construction period. No pile driving or other construction activity that would generate very high noise would occur. Construction activity would comply with Section 41.40 of the LAMC, which regulates the hours of construction activities, and restricts construction activity to between 7:00 a.m. and 9:00 p.m. In addition, construction activities within 500 feet of residential areas would not occur before 8:00 a.m. or after 6:00 p.m., unless otherwise approved by the City.

Treatments would occur within existing right-of-ways and, as discussed above, would not involve intense construction activity. It is anticipated that project-related construction noise would be the same within each APC. It is possible that construction activities lasting more than one day would exceed existing ambient noise levels by 10 dBA or more at any one noise sensitive use as construction proceeds along a transportation corridor; it is not anticipated that construction activities lasting more than ten days in a three-month period would exceed existing ambient noise levels by 5 dBA or more at any one noise sensitive use, and/or it is not anticipated that construction activities would exceed the ambient noise level by 5 dBA at any one noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or anytime on Sunday. Therefore, without mitigation, the proposed project would result in a significant impact related to construction noise. Mitigation Measure **NI** (see below) would reduce construction noise within 500 feet of sensitive land uses to less than a 5 dBA incremental increase from existing noise levels. For example, the Los Angeles CEQA Thresholds Guide states that engine mufflers reduce noise levels by at least 3 dBA. Impacts would be reduced to less than significant.

N1 Construction activity that would last more than a day, that could increase ambient noise by more than 5 dBA, and would be located within 500 feet of a sensitive land use shall incorporate measures to reduce noise levels at sensitive receptors including, but not limited to, sound walls, sound blankets on impact equipment, and engine mufflers to reduce noise levels to acceptable levels. The noise reduction levels achieved by the measures shall limit noise increases to less than 5 dBA over the existing ambient levels.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-19

More details are also needed on how TENs, PENs, NENs, VENs and BENs might have cumulative impacts on one another, as well as how other projects in the area (planned and unplanned) may have cumulative effects with this project. There has been a historic lack of strategic planning in the city as one development project after the next appeals to the City Council for zoning variances. The result is a hodgepodge of clashing projects with reduced quality of life for Angelenos. This ad hoc approach leaves questions as to how future commercial developments will impact the currently proposed project.

Response R209-19

The effects of the components of the MP 2035 have been addressed through use of a comprehensive City-wide travel demand model. See **Master Response 1** regarding the traffic impact assessment methodology and additional information on the model. One of the major benefits of the model is that it is able to quantify changes to all of the enhanced networks, when one of the enhanced networks is changed or modified. The use of the transportation model has enabled the mobility plan to maximize the benefits to the regional transportation network with the least disruption to the existing vehicular network. Without this tool, it would be difficult, if not impossible, to validate whether changes to the networks would have a greater or lesser cumulative effect. The model has also been varied to account for various combinations of the various MP 2035 components in the assessment of alternatives. As such, on a programmatic basis, the interaction and interrelationship between the plan components has been addressed.

The right to appeal project approvals and environmental decisions is part of the City's process. Approval decisions and recognition of the consequences are solely and ultimately determined by the elected officials (City Council).

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-20

The alternatives presented in the DEIR were as follows:

Alternative 1 – No Project.

Alternative 2 – Fewer Comprehensive Enhancements.

Alternative 3 – Project without Bike Lanes and Fewer Miles of Transit Improvements (similar to the original project analyzed in Draft EIR).

Alternative 4 – Project with Priority Bike Lanes Only (in general those bike lanes that have been identified to be implemented in the short-term).

Alternative 5 – Increased Comprehensive Enhancements, Transit Only Lanes.

The alternatives presented in the DEIR are limited in scope and consideration. The alternatives the City is contemplating can be reduced and surmised as the addition of fewer bike lanes and/or transit only lanes. The limited depth associated with considering alternatives really needs to be highlighted because increasing mobility in Los Angeles is going to require a larger range of considerations given we have the worst traffic in the country. There needs to be a more robust conversation about the full range of plausible alternatives for enhancing mobility. We have already put forward the quality not quantity approach of protected bike lanes as a solution. Other ideas, some of which are mentioned in the report as being parts of Federal, State and Local plans, but were not considered as alternatives include promoting ride-sharing services or developing park and rides, reversible lanes during peak hours, grade separations at intersections and active traffic management monitoring systems.

Response R209-20

At the programmatic level, it is infeasible to assess the all potential mobility improvements on every route within the City. The Transportation Demand Model allows the City to evaluate impacts at the Area Planning Commission level. Together with public input, the City prioritized those corridors that provided the greatest potential for mobility benefits while minimizing effects to the environment and existing transportation system. See **Master Response 22** for the EIR analysis and conclusion explaining why the scope/level of analysis is appropriate. **Master Response 12** provides information for the EIR analysis and conclusion regarding project alternatives.

The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR, including the alternative analysis. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-21

Also, signal timing was mentioned as something that would occur after implementation on an “as needed basis” to accommodate traffic volume changes. Given traffic is already at capacity on many streets as demarcated by the LOS, it might make sense not to wait for implementation to occur before providing for optimization. All alternatives need to be devised so they are consistent with local conditions and fall in line with neighborhood plans.

Response R209-21

Traffic signal timings are continually reviewed and refined through LADOTs Automated Traffic Surveillance and Control (ATSAC) System. ATSAC is the centralized traffic control center for the City of Los Angeles. The system provides real-time monitoring and adjustment of signal timing for nearly 4,400 signalized intersections citywide. Citywide there are over 20,000 loop detectors located at signalized intersections. These detectors collect information on vehicles as they pass over them and this information is sent to the LADOT centralized traffic control center. See also **Master Response 1** regarding the traffic impact assessment methodology.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-22

Section 3.2 of the DEIR covers the project goals and objectives. As stated, they are:

(A) Safety First, (B) World Class Infrastructure, (C) Access for all Angelenos, (D) Collaboration, Communication & Informed Choices, and (E) Clean Environment and Healthy Communities. We would like to put forward that the proposed project fails with respect to most of these goals. We feel that safety is being

compromised by additional congestion. The quantity instead of quality approach does not point to world class infrastructure and limits access for Angelinos. Finally, more congestion means a less clean environment and less healthy community.

Response R209-22

See **Master Response 1** regarding the traffic impact assessment methodology and the vehicle-centric nature of the analysis, and **Master Response 11** for the EIR analysis and conclusion regarding development of the project and the goals and objectives and **Master Response 15** for the EIR analysis and conclusion regarding transportation performance metrics. Safety is addressed in **Section 4.1 Transportation, Parking and Safety**.

The proposed project would have a significant impact if it would substantially change transportation safety. CEQA guidelines broadly define a safety impact threshold as “substantially increase hazards due to a design feature (sharp curves or dangerous intersections) or incompatible land uses (farm equipment). The MP 2035 does not include specific design features or modify land uses that are expected to be incompatible with safe transportation operations. See **Master Response 4** for the EIR analysis and conclusion regarding potential air quality effects and **Master Response 2** for the EIR analysis and conclusion regarding effects to quality of life.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R209-23

In conclusion, this project appears to be a compilation of ill-conceived plans that lack sensible proposals for solving mobility problems. The DEIR fails to include reasoned justifications for many of the proposals, making them difficult for this community to accept. For these reasons, we oppose this project as proposed and request that the City work directly with the community to come up with a plan that enhances mobility for Angelenos, as opposed to stymieing it.

Response R209-23

The CEQA process provides information regarding the environmental consequences of a proposed project; it is not intended to provide justification for a project. The MP 2035 has benefited from substantial public input through meetings and workshops. See **Master Response 6** for the EIR analysis and conclusion on public outreach. The project goals and objectives, as well as the identification of priority transportation corridors have been identified and refined through the incorporation of this input received. Given the diverse interests from citizens of such a large City, it is impossible to satisfy all the desires of every citizen. However, through the robust public input process, goals and objectives, and mobility improvements have been identified that maximize the benefit to the public interest, while minimizing the potential harm. The commenter’s opinions will be forwarded to the decision-makers for their consideration in taking action on the project.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. R210

Debbie and Howard Nussbaum
Westwood Hills

Comment R210-1

Implementing Mobility Plan 2035 as addressed in the EIR with an extensive emphasis on incorporating bike lanes (especially in the form of Class IV/cycle tracks) on the major Westside thoroughfares is dangerous especially where current daily traffic counts are greater than 25,000 vehicles per day. Streets with 25K+ vehicles per day will gridlock if any of the existing travel lanes are removed (Westwood Blvd. and Sepulveda Blvd. in particular). To be a Great/Complete Street vehicle traffic must flow! For everyone's safety bike lanes should be on neighborhood streets where speeds are 25mph or less to start with!

Response R210-1

See **Master Response 1** regarding the traffic impact assessment methodology and assumptions. The MP 2035 Enhanced Network treatments includes the NEN, which are focused on improving travel for bicyclists and pedestrians along neighborhood roadways. **Master Response 20** contains additional information for the EIR analysis and conclusion on the NEN. While the NEN focuses on neighborhood streets where speeds are 25mph or less, as requested in the comment, bicyclists are allowed to travel on any roadway per the California Vehicle Code (which preempts City authority). The MP 2035 EIR is a programmatic document that addresses impacts at an area level based on preliminary conceptual level information. As stated in **Chapter 1.0 Introduction** and **Section 4.1 Transportation, Parking and Safety** of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles' Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R210-2

Don't make congestion worse than it currently is. Cars are part of the Los Angeles culture, moving commuters to public transportation is noble, time will be required to change habits and for many local and commuting motorists it will never be practical to make a switch to public transportation: seniors, disabled, or young children unable to walk the first and last mile of a commute, parents ferrying children to schools and activities, carpoolers, hillside residents not served by bus routes, or shopping errands.

Response R210-2

See **Master Response 1** regarding the traffic impact assessment methodology and conservative vehicle-centric assumptions. See **Master Response 11** for the EIR analysis and conclusion regarding the development of the MP 2035, **Master Response 15** for the EIR analysis and conclusion regarding transportation performance metrics, and **Master Response 19** for the EIR analysis and conclusion on the implementation of the enhanced networks.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R210-3

1. *What will the effect of putting Class IV/cycle tracks on Westwood (Wilshire to Le Conte) have on bus traffic? Will the bike lane be between the curb and parking lane? Will the bike lane be between the parking lane and the traffic lane?*

Response R210-3

Cycle tracks are not being proposed on Westwood Boulevard. **Master Response 10** describes the enhanced network treatments proposed along the corridor.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R210-4

5. *Bike lanes or cycle tracks between the curb and a parking lane on Westwood Blvd. need to be very carefully evaluated, please comment on:*
 - a. *Bicyclists getting “doored” when vehicle passengers open a car door? Car side-view mirrors are not set up for passengers exiting vehicles.*
 - b. *Views of bicyclist in a curbside protected bike lane will be masked by parked cars; this will make for dangerous situations at all intersection. Will motorists be able to make right turns?*

Response R210-4

Refer to **Response R210-3** for the proposed MP 2035 treatments for Westwood Boulevard. When design details for the specific treatments and enhancements become available, additional review of these safety concerns will be evaluated. **Master Response 13** also provides the EIR analysis and conclusion on bicycle safety. See **Master Response 24** for the EIR analysis and conclusion regarding pedestrian safety and other vulnerable populations.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R210-5

Motorist will not be able to move close to the curb to queue for a right turn, will they now block traffic lanes?

- c. *Will additional sets of bike only signal timing need to be added to signaled intersections?*
- d. *What effect will additional bike sets of signal timing have at ATSA controlled signals? Can ATSA controlled corridors function when 1 or 2 signals that contain an additional signal phase?*
- e. *Will Wilshire/Westwood traffic signal timing be affected by adding a bike lane along Westwood Blvd?*

Response R210-5

Refer to **Response R210-3** for the proposed MP 2035 treatments for Westwood Boulevard. The types of treatments being considered for Westwood Boulevard would not result in impacts to vehicles turning right at intersections or result in the need to modify traffic signal timings. Additionally, see **Master Responses 1** and **22** on the level and scope of analysis in the EIR being at the programmatic level.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R210-6

Look into safety at driveways and alleys, and excessive bike speed on downhill segments.

Response R210-6

The EIR is a programmatic-level document. See **Master Response 22** discussing the scope/level of analysis of the EIR. As individual projects are considered, additional data will be collected and project-level impacts will be addressed at that time under a separate undertaking. The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. **Master Response 13** provides additional information for the EIR analysis and conclusion on bicycle safety.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).) Commenter's policy questions and issues will be forwarded to the decision-maker for its consideration prior to project approval.

Comment R210-7

7. *The implementation of bike lanes along Westwood Blvd. or Sepulveda Blvd. is targeted at connecting Expo Line riders with jobs in Westwood. How will taking road width from Westwood Blvd. or Sepulveda Blvd. between Santa Monica Blvd. and National Blvd. have on the vehicle commuters traveling up from the South Bay or in from the San Fernando Valley and beyond?*

Response R210-7

Refer to **Response R210-3** for the proposed MP 2035 treatments for Westwood Boulevard. The proposed network treatments would not require the removal of a travel lane on Westwood Boulevard. The MP 2035 EIR is a programmatic document that addresses impacts at an area level based on preliminary conceptual level information. As stated in **Chapter 1.0 Introduction** and **Section 4.1 Transportation, Parking and Safety** of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles' Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions. See **Master Response 1** regarding the traffic impact analysis methodology. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R210-8

8. *Look into the effect that putting bike lanes on Westwood Blvd. and Sepulveda Blvd. will have on disabled persons that need to park along curbs in order to safely get in and out of their vehicles or for parents who need to open car doors completely in order to get children in and out of car seats. Especially true if placing bike lanes between curb and parking.*

Response R210-8

The network treatments along Westwood Boulevard and Sepulveda Boulevard are not anticipated to remove or relocate on-street parking. See **Master Response 24** regarding pedestrian safety and other vulnerable populations. The commenter provides no substantial evidence supporting the need for different analysis or

conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R210-9

9. *Looking into smart use of Westside streets rather than major street arteries like Westwood Blvd. or Sepulveda Blvd. to accommodate all mobility, bike lanes DO NOT need be on major thoroughfares. LADOT acknowledges that bike lanes on streets with vehicle volumes greater than 25,000 vehicles per day would create negative results.*

Response R210-9

The MP 2035 includes the BEN and NEN to provide bicycle facilities throughout the City. **Master Response 20** contains additional information on the NEN treatments. The MP 2035 EIR is a programmatic document that addresses impacts at an area level based on preliminary conceptual level information. As stated in **Chapter 1.0 Introduction** and **Section 4.1 Transportation, Parking, and Safety** of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles' Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions. See **Master Response 1** regarding the traffic impact analysis methodology.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R210-10

25. *Evaluate the congestion along Wilshire Blvd. that is set to worsen with the implementation of the Wilshire – BRT*

Response R210-10

The bus lanes on Wilshire Boulevard are a Metro project that was under design and construction during the preparation of the MP 2035 EIR and the bus lanes were recently opened in April 2015. The bus lanes were included in the transportation analysis for both future no project and plus project conditions. As stated in **Chapter 1.0 Introduction** and **Section 4.1 Transportation, Parking, and Safety** of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles' Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions. See **Master Response 1** regarding the traffic impact analysis methodology.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R210-11

26. *Don't turn Olympic Blvd. into a freeway by eliminating left turns at major intersections. A UCLA study saying this will result in greater cut through traffic on residential streets and longer commutes. Look in to this.*

Response R210-11

Master Response 17 describes the network treatments proposed on Pico and Olympic Boulevards. The elimination of left turns at major intersections along Olympic Boulevard are not being proposed as part of MP 2035. Finally, the commenter provides no substantial evidence supporting the need for different analysis

or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R210-12

27. *Don't remove parking from Westwood Blvd or Sepulveda Blvd. this is very bad for business and area residents.*

Response R210-12

See **Master Response 3** for the EIR analysis and conclusion regarding the loss of parking. The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R210-13

30. *Will additional trees be planted along Sepulveda and Westwood Blvds?*

31. *Evaluate the effect that widening the I-405 and increasing the ramp capacity will have on adding additional vehicles to the streets around Westwood.*

Response R210-13

While additional trees along Sepulveda and Westwood Boulevard could help to improve the pedestrian environment per the goals of MP 2035, the proposed project is not prescribing landscaping treatments to this level of detail. **Master Response 19** discusses the EIR analysis and conclusion for the implementation of the enhanced networks. The widening of I-405 was under construction during the preparation of the MP 2035 EIR and opened in mid-2014. The widening was included in the transportation analysis for both future no project and plus project conditions. As stated in **Chapter 1.0 Introduction** and **Section 4.1 Transportation, Parking, and Safety** of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles' Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions. See **Master Response 1** regarding the traffic impact analysis methodology.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R210-14

32. *Mobility Plan 2035's Transit Enhanced Network map doesn't address types of north/south mass transit. Why? Transit on the I-405 (Pico to Mulholland) greatly effects local street traffic. This is a big piece of the puzzle!*

Response R210-14

The MP 2035 includes numerous north-south transit corridors as part of the TEN including several in the Westside area. The Sepulveda Pass project is part of the TEN and would provide transit service between Westwood Village and the San Fernando Valley. In addition, Sepulveda Boulevard to the south between Wilshire Boulevard and the LAX area is part of the TEN. Lincoln Boulevard between the City limit at Santa Monica and LAX area is also part of the TEN. These north-south transit lines would connect to the east-west lines currently under construction (Expo Line Phase II) and in final design (Westside Subway extension). See **Master Response 11** for the EIR analysis and conclusion as to how the MP 2035 and the enhanced networks were developed.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R210-15

33. *Mobility Plan 2035 will increase vehicle miles traveled on freeway mainline segments, I-405 will experience an increase of 1.5 million VMT (18 percent) over existing conditions. per Table 4.1-30 (Vehicle Miles Traveled on Freeway Mainline Segments in the City of Los Angeles). What is the greenhouse gas increase of an additional 1.5 million VMT of I-405 motorists? Does this balance with what is saved by adding bike lanes?*

Response R210-15

GHG analysis was based on regional vehicle miles traveled (VMT) that included surface streets by APC and the freeway system within the City. According to the Caltrans Standard Environmental Reference, global climate change and GHG emissions are a cumulative impact.⁵⁴ An individual project does not generate enough GHG emissions to significantly influence global climate change. The MP 2035 is designed to improve mobility throughout the City. Therefore, changes in GHG emissions are assessed regionally using VMT by APC and combined for the City. This methodology is consistent with the methodologies used by the CARB to compile to estimate the mobile source GHG emissions inventory and by the SCAG to estimate regional GHG emissions in the RTP/SCS.^{55,56} Similar to the proposed project, these documents assessed mobile source GHG emissions using an estimate of regional VMT. There are specific locations within the City (e.g., Westwood Boulevard) where traffic congestion may increase due to project elements, such as bicycle lanes. However, as global climate change and GHG emissions are a regional issue, emissions associated with the MP 2035 are not addressed on a local scale.

Regional VMT was estimated using an updated version of the City of Los Angeles' Travel Demand Model. The model developed for the MP 2035 is based on the Transportation Specific Plan (TSP) model, which utilizes the TransCAD Version 4.8 Build 500 modeling software and has been calibrated and validated for current conditions. The model-estimated changes in circulation system conditions are conservative, vehicle-centric estimates based on historical travel behavior patterns and do not account for changes in demographics, vehicle ownership patterns, energy prices, and migration to alternate modes (pedestrian, bicycle and transit) that would lead to decreasing vehicular volumes. Transportation demand models are largely dependent on historical travel patterns and mode choices when forecasting future traffic projections. Recent research in this area suggests that factors correlated with annual VMT over the last 60 years include the economy, demographics, technology, and the urban form of the built environment. Specifically, this research shows both cyclical recession effects and a structural leveling of the economy and travel. Refer to **Section 4.1 Transportation, Parking and Safety** for a detailed discussion related to the methodology for estimating VMT.

The results of the GHG analysis are shown in **Table 4-4** on Page 4.4-10 of the Draft EIR. Specific to the freeway system, GHG emissions were estimated to be 10,562,282 metric tons per year in Existing Conditions, 6,669,874 metric tons per year in Future No Project Conditions, and 6,892,287 metric tons per year in Future With Project Conditions. Although it is estimated that regional growth would result in increased regional VMT, the implementation of the GHG engine emission standards known as the Pavley Rules would substantially reduce tailpipe GHG emissions between now and 2035. When freeway emissions are combined with surface street

⁵⁴California Department of Transportation, *Environmental Impact Report/Environmental Impact Statement Annotated Outline*, August 2013.

⁵⁵California Air Resources Board, *First Update to the Climate Change Scoping Plan*, May 2014.

⁵⁶Southern California Association of Governments, *2012-2035 Regional Transportation Plan/Sustainable Communities Strategy*, September 11, 2014.

emissions to represent regional emissions, the analysis indicates that GHG emissions under Future With Project conditions would be 7 million metric tons per year less than under Existing conditions (38 percent reduction). GHG emissions under Future With Project conditions would be reduced by 22 thousand metric tons per year less than under Future No Project conditions (<1 percent reduction). Therefore, the proposed project, including bicycle lanes, is anticipated to decrease GHG emissions.

Comment R210-16

34. What is the plan to deal for “Road Rage” created by increased traffic delays?

Response R210-16

Road rage can become a police matter; it is not an issue addressed in planning documents. The City is not aware of any studies that address the impact of road rage or aware of any evidence that would support the claim of road rage as a foreseeable impact. See **Master Response 1** regarding the traffic impact assessment methodology and vehicle-centric assumptions. The MP 2035 has been developed to respond to changing the changing regulatory environment (Complete Streets Act, SB 743 among others) and the changing population of the City of Los Angeles. The intent is for the Los Angeles street system to provide for all segments of the population with the resources available. See also **Master Response 11** for the EIR analysis and conclusion regarding development of MP 2035.

The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR, including as to evidence to support impacts from road rage. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R210-17

Baby steps are needed with implementing the 2035 Mobility Plan. Every business streets does not need a bike lane if it comes at the expense of parking lanes or anti gridlock lanes, there are side streets for safe bicycles routes. Westwood residents have been more vocal against bike lanes than in other areas primarily because congestion is worse here and cars are here to stay because large numbers of commuters will not be served by public transportation because the South Bay and the San Fernando Valley are not being connected to the Westside via public transportation other than rapid buses.

Response R210-17

See **Master Response 1** regarding the traffic impact assessment methodology and vehicle-centric assumptions. The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City’s leadership. See **Master Response 10** for the EIR analysis and conclusion regarding Westwood Boulevard, **Master Response 2** for the EIR analysis and conclusion regarding the conversion of vehicular travel lanes to transit or bike lanes, **Master Response 3** for the EIR analysis and conclusion regarding parking, **Master Response 11** for the EIR analysis and conclusion regarding the development of the MP 2035, **Master Response 15** for the EIR analysis and conclusion regarding transportation performance metrics, and **Master Response 19** for the EIR analysis and conclusion on the implementation of the enhanced networks.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. R211

Aaron Rosenfield
Westside Neighborhood Council

Comment R211-1

The Westside Neighborhood Council has voted to support the comments that were submitted to your department on March 6, 2015 by the West of Westwood Homeowners Association (WOWHOA) concerning the 2035 Mobility Plan DEIR (ENV 2013-0911-EIR). The comments are enclosed again for your review.

Response R211-1

The commenter's support for the comments submitted by the West of Westwood Homeowners Association is acknowledged. For responses to these comments refer to **Responses R209-1** through **R209-23**.

LETTER NO. R212

Fran Reichenbach
Beachwood Canyon Neighborhood Association

Comment R212-1

We request that the Neighborhood Enhanced Network route from Franklin Avenue and Vista Del Mar Avenue to the northern end of Beachwood Drive be removed from the 2035 Mobility Plan. We oppose the reduction in traffic speed to 15 MPH or even the amended 20 MPH and the possible inclusion of this route in any future effort to reduce the vehicle traffic lanes for cycle tracks or any other alleged “traffic calming” proposals.

Due to the lack of sidewalks and vehicle turn-arounds, and the many blind curves and steep inclines on these narrow sub-standard roads, there is no and has never been any significant bicycle traffic on this route and there is no way that it could be made safe.

This is not a request for a realignment of the route. The entire area has the same conditions and is not suited for bicycle or pedestrian traffic. The streets leading away from the hillside homes are important safety and emergency egresses. For the sake of the lives and welfare of the residents, these roads should not be compromised in any way. We cannot afford any loss of traffic lanes.

Designation of this route as part of the 2035 Mobility Plan only serves to legitimize it as an official guide to the Hollywood Sign. Doing this exacerbates an already unsafe condition.

There is no space available for developing amenities as called for in your plan. Furthermore, the residents on this route have been suffering for over a decade from major traffic congestion caused by social media and GPS navigation systems guiding people to the nearest place to view the Hollywood Sign or hike to it. This increase in vehicles and pedestrians on our small sub-standard streets have already caused a public safety crisis when emergency services need access to the area. This situation is a daily problem and will not be corrected while there is a Hollywood Sign attracting people to our neighborhood.

Response R212-1

See **Master Response 21** regarding the Neighborhood Enhanced Network from Franklin Avenue and Vista Del Mar Avenue to the northern end of Beachwood Drive.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. R213

Sarajane Schwartz
United Homeowners on Beachwood Drive

Comment R213-1

I am writing to you representing Homeowners on Beachwood Drive United, an organization that was formed by the residents of Beachwood Drive in Hollywoodland because of the dangerous conditions on our street. We demand that that you remove the Franklin Ave/Vista Del Mar/upper Beachwood Drive route from the Neighborhood Enhanced Network of the 2035 Mobility Plan.

1)Streets are substandard, narrow, winding without sidewalks.

2)There is high density daily pedestrian and vehicular traffic (in the thousands) all literally in the streets with no sidewalks because of the proximity to the Hollywood Sign.

3)A resident died in house fire because emergency vehicles could not navigate our narrow streets (which at the time were empty of heavy traffic)which became the impetus for the Red Flag Program throughout Los Angeles.

4)A recent LAFD study called current conditions here unsafe.

5)A recently passed City Council motion plans to shut down the street on at least 90 days of the years if not more to all outside traffic with only residents allowed in because of the current dangerous conditions that have overwhelmed our infrastructure.

6)Adding and encouraging and formally designating this route for bicycles adding more chaos to this mix of pedestrians and cars is nothing short of insanity and would certainly open the City to huge liability.

7)There is no way to mitigate these problems caused by the extremely limited infrastructure here short of bulldozing our houses.

8)You have picked the worst street for this route. If you want a route in this area that leads to the park there are many other better streets, for example, Bronson and Canyon. It is a straight, wide street, with sidewalks that leads to the park where there are parking lots, bathrooms and water. It has everything we do not.

Response R213-1

See **Master Response 21** regarding the Neighborhood Enhanced Network from Franklin Avenue and Vista Del Mar Avenue to the northern end of Beachwood Drive.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER R300 FORM LETTER FROM SPAULDING SQUARE

Sunset and Spaulding Squares: Aaron Jackson; Adriana Mardirosian; Alan Poul; Alla & Michael Olshansky; Andrew Carrollman; Andy Gould; April Blair; Arash Yaghoobian MD; Barbara Bagley; Benjamin Kushner; Brooke Senior; Bruce Remick; Caryn Jackson; Catherine Olim; Charlie Mcbrearty; Cherilyn Smith; Cheryl Holl&; Chip Sullivan; Claire Guy; Chris Alex&er; Courtney Small; Darren Higman; David Bonicatto; David Nicksay; Deborah Rosenthal; Denise Foley; Donald Wasson; Ellen & Todd Cheney; Ellen Pittleman; Erik Mcdowell; George Underwood; Adilman, Glenn; Gwen Hitchcock; Halsted Sullivan; Helen Berman; Helen Klein & Elie Daher; Ida Spencer; Jason Reilly; Jeanine Tasudis; Jeffrey Hersh; Robin & Jeffrey Smalley; Jenifer Barkon; Jim Mckenzie; Joan Foley Mann & Stanley Mann; Joel Alaniz; Julie Breaux; Karen Kondazian; Kathyne Dora Brown; Kevin Batten; Kitty Wise; Kyrstin Munson; Lara Cody Curci; Larry A Hoffman; Lily Mariye; Marc Fogel; Martin & Mary Samuel; Michael Janofsky; Michael B. Levine; Michael Mendelsohn; Michael Moran; Tamara Bergman & Michael Schwartz; Michael Tredo; Michelle Pollack; Nathalie Samanon; Neal Avron; Pam Griffiths; Pamela & Bill Bothwell; Robert Mott & Thai Lam; Robert Smith; Robyn Weisman; Robyn Westcott; Ronald & Constance Spriestersbach; Sally Struthers; Sarah Boyer & Adam Leber; Susan Pintar; Susan Davis & Lloyd Taylor; Tamara Bergman & Michael Schwartz; Theresa Laughlin; Tilton Terri; Timothy K. Brock; Todd Romanick; Wendy Kneedler, Stephen Steelman

Comment R300-1

We are residents of Sunset and Spaulding Squares, two historic neighborhoods along Sunset Blvd between Hollywood Blvd and Fountain Avenue. We are extremely concerned about the negative impact that the changes proposed by the Mobility Plan and VEN would have on this primarily residential neighborhood flanking Sunset Blvd, west of La Brea to the West Hollywood border. We also have a small commercial zone containing local businesses in this area of Sunset Blvd as well--businesses which serve our residents. THIS IS A RESIDENTIAL NEIGHBORHOOD, NOT A FREEWAY. We need traffic calming, not additional dangerous speeds or widening.

Thank you for the opportunity to comment on the Mobility Plan 2035 Recirculated Draft EIR.

Reference City Case No. ENV-2013-0911-EIR - Related Case NO. CPC-2013-0910-GPA-SP-CA-MS-C - State Clearinghouse No. 2013041012

Please address the below concerns and provide detail on implementation, mitigations and impacts to Hollywood Blvd, Sunset Blvd, Fairfax Ave (west of La Brea) as part of the Mobility Plan 2035 - recirculated Draft EIR.

Thank you for your time reviewing the following comments as part of the Draft EIR for Mobility Plan 2035.

Opposed: Fairfax Ave - Proposed Street Designation Change to "Boulevard I"

Do not increase speed on Fairfax Ave north of Fountain Ave to target speed of 40 mi per hour. Maintain or reduce speed on Fairfax Ave.

Fairfax Ave north of Fountain Ave to Hollywood is residential, with homes on the east side of Fairfax, just north of Sunset part of Sunset Square HPOZ neighborhood. There is a narrow bike lane, current posted speed limit is 35. Increasing speed on Fairfax Ave would increase safety hazards for pedestrians and bike riders and more noise for the residents.

Opposed: Proposed Vehicle Enhanced Network [VEN] on Sunset Blvd west of La Brea—We are a residential neighborhood!! We cannot be a freeway.

Please remove Sunset Blvd west of La Brea to the City of West Hollywood boundary from the proposed VEN - Mobility Plan 2035.

Sunset Blvd west of La Brea is primarily residential anchored by two historic single family neighborhoods Spaulding Square HPOZ and Sunset Square HPOZ and multi family neighborhoods. The

neighborhoods, north and south of Sunset Blvd are unique residential with many families with small children and seniors who walk on and cross Sunset Blvd regularly. Gardner Elementary School is located on Gardner Street at Hawthorne just north of Sunset. Residential use starts just fifty to one hundred feet from Sunset with minimal to no buffer between residential and commercial uses on Sunset Blvd west of La Brea to the City of West Hollywood border. The narrow commercial strip that lines Sunset Blvd west of La Brea is older, historic character, mostly low rise one and two story structures with lower intensity earlier closing uses. Local residential streets cannot support or accommodate additional parking for employees, patrons, delivery trucks, valet parking set up. The proposed VEN for Sunset Blvd west of La Brea will encourage more traffic and increased speed greatly diminishing the quality of life for the surrounding neighborhoods, single family and all residential neighborhoods.

Opposed: removal of street parking on Sunset west of La Brea. We have small residential businesses

Removing parking from Sunset Blvd, west of La Brea would put our local businesses out of business. The majority of the commercial structures along Sunset are, older "grandfathered" historic structures. Many are local mom & pop businesses that share often little to zero on-site parking for their employees and patrons. A few establishments use valet with set up on Sunset.

The removal parking and and stopping for our small businesses on Sunset Blvd would cause great harm to the small local businesses and effectively eliminate businesses from taking delivery of goods and services. Deliveries should continue to take place on Sunset Blvd west of La Brea and Not on residential streets.

Residential streets along Sunset Blvd in no way can accommodate more employee and patron parking or valet set up, drop off and pick up or commercial delivery trucks on the narrow street and in front of private residence.

Prohibiting parking, valet and delivery trucks from Sunset Blvd would force all these uses to stage in front of residential homes, on residential streets 24/7. This intrusion would not be protecting neighborhoods, not in line with the general plan framework elements, or the Hollywood community plan.

The residential streets off Sunset Blvd currently are too narrow to accommodate garbage trucks and pass through vehicles at the same time. If the garbage truck is on the street, vehicles must back out off the street, or wait a long while to pass through.

Added Note: All and any Valet set up operation is to take place on Sunset Blvd and not in the middle of the residential streets. This is a hazard. There have been several accidents on residential streets when Valets are stopped and people turning on to the streets from Sunset do not expect a car to be stopped in the middle of the road. The Valets are too close to the corner on the residential streets because the commercial zone there is very narrow.

Opposed: prohibition on Delivery Trucks and Vehicles

Removing parking and prohibiting stopping on Sunset Blvd for loading and unloading would force all delivery trucks and vehicles on to narrow residential street where parking is already over burdened. The neighborhoods along Sunset west of La Brea are one hundred year old, with narrow local streets. There is hardly any to zero buffer between commercial and residential use. The local streets can't accommodate truck weight or size. See photo

Traffic Study is out of Date:

Traffic studies for the Mobility Plan 2035 seven years old and outdated, particularly for the Hollywood area. The traffic studies do not take in to account the numerous street and sidewalk closures which have tremendous impact on surrounding streets, such as Hollywood blvd, Sunset Blvd, La Brea, Highland Ave and Cahuenga Blvd. Updated 2015 traffic studies should be included in the Draft EIR.

Additionally, traffic studies do not include the volume of new construction in the Hollywood area and close by City of West Hollywood La Brea and Sunset Blvd. Updated 2015 traffic studies must be conducted to include street closures, recently completed (last 3 years) and future construction should be included in the Draft EIR.

Opposed: Increased street speeds on Sunset west of La Brea. We walk on our streets!

The proposed VEN for Sunset Blvd west of La Brea will bring more traffic, greatly diminish the quality of life for neighborhoods, single family and all residential neighborhoods.

Sidewalks are narrow and don't have any buffer between vehicle and trucks other than the parked cars. Children are crossing Sunset at various corners to go to Gardner St Elementary School. Any increased speed on Sunset would make further unsafe conditions for all pedestrians.

Increased vehicles speed will increase noise on and From Sunset Blvd. Residential uses are 50 feet off Sunset and will be negatively impacted by increased noise.

Current posted speed on Sunset Blvd is 35 mph and should not be increase. If any changes decrease speed.

Opposed: to limiting of construction & filming to night time.

The historic single family neighborhood and businesses along Sunset Blvd are often used for filming. Prohibiting day time filming would be would have a great negative financial impact. Restricting construction and utility work to night time only would have severe negative impact on the health, welfare and safety to the residential neighborhoods along Sunset Blvd. Night time construction noise in or next to residential neighborhood is "nusaince noise" and against the law. Also not in line with the Noise Element in the General Plan Framework for the City of Los Angeles

Residential uses are 50 feet off Sunset and will be negatively impacted by increased noise.

Opposed: Narrowing of Pedestrian Sidewalks. This is a neighborhood. We need safe & wide sidewalks.

Fast moving vehicles in the curb lane (suicide lane) are very dangerous for pedestrians. Sidewalks are narrow, and with added dining on the public right of way, it pushes pedestrians even closer to vehicle traffic. Parked vehicles are often the only buffer between pedestrians and vehicles. Do No increase speed or remover parking

Opposed: Street Widening

Sunset Blvd, Hollywood Blvd, Fountain Ave and residential streets can not support further widening. Current street width should be maintained. The widening of any streets west of La Brea would further reduce already narrow sidewalks, This would create unsafe conditions for all pedestrians. No street widening west of La Brea to the City of West Hollywood boundary.

Response R300-1

See **Master Response 21** for details regarding the network designations in the Hollywood area. See **Master Response 22** related to EIR scope/level of analysis being at the programmatic level. See **Master Responses 1, 2, and 3** on EIR analysis and identified impacts related to transportation and noise, and removal of parking.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

LETTER NO. R301

Wendy Ellis

Comment R301-1

Please extend the deadline for comments on Mobility 2035 ENV-2013-0911-EIR. You have not given the residents enough time to review and understand it. More time is needed PLEASE.

Response R301-1

See **Master Response 6** for the EIR analysis and conclusion regarding public participation. The proposed MP 2035 and Draft EIR were both released in February 2014 for a 90-day public comment period. The RDEIR included an updated project description based on continued agency coordination and public comments received on the Draft MP 2035 and Draft EIR, additional model analysis that considers a more comprehensive analysis of installing bicycle lanes, additional miles on the TEN, and three additional alternatives. The RDEIR was made available for the required 45-day public review period. DCP continues to consider comments received on the plan through the public hearing and adoption process. No extension of the public review period is appropriate given the extensive review process and public input to date. An additional public hearing will be held before adoption of the project and certification of the EIR, where the City Council will receive additional public input.

Letter No. R302

Catherine Des Lauriers
Spaulding Square
1325 N. Genesee Avenue
Los Angeles, CA 90046

Comment R302-1

We need to have the streets calmed with smaller widths and lower speeds for the safety of pedestrians and bicyclists and to make our homes a nicer place to live. I am 100% in favor of the plan, including more high-density housing, more walking space, and more protected bicycle lanes. I bike to work but it is a scary prospect right now, even though I stay on back streets as much as possible and use streets that have bike lanes. I also walk and run in Hollywood and it is an achievement to get across the street safely!

Response R302-1

The proposed enhancements include the development of bicycle and transit lanes and other street improvements to address pedestrian needs and safety and improve the through movement of vehicular traffic. The MP 2035 is intended to facilitate circulation throughout the region and encourage multi-modal travel. This facilitation of movement occurs by establishing different modal networks that are sited in locations with compatible land use. One of the fundamental goals of the MP 2035 is Safety First.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R302-2

The older crowd at the meeting is not getting all the facts, probably because they are not that proficient with the internet. I think if they knew of some alternatives to driving, they would be more receptive. And they are getting to the age when they may not be able to drive much longer. It is somewhat ironic that none of them will be around in 2035 and yet they have a huge influence now.

I would like to see more of an effort to reach out to this group with more traditional methods of communication. Claire Bowin made an heroic effort to get a lot of information out there in a short period of time, but I don't think they were listening after they found out parking spaces would be removed and such.

Response R302-2

See **Master Response 6** for the EIR analysis and conclusion regarding public outreach and different media types of communication.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R303

Bill Kearney
blindenken@earthlink.net

Comment R303-1

I enjoyed the presentation of the Mobility Plan 2035 given at Bonham's Auction establishment.

I live on Gardner St just north of Fountain Ave. I am requesting that the street not be widened as the properties near Sunset Blvd. and Gardner St. and nearer Fountain St. do not have adequate frontage on Gardner St. to absorb the loss. The planning representative talked about "Traffic Calming". She informed me that "Traffic Calming" would include adding trees to the parkways and adding road bumps to slow the traffic. Adding trees to the parkways on Gardner St. would be beneficial for the neighborhood. Many of the trees have died and have been removed, but not replaced. This creates a barren landscape on Gardner St. Adding road bumps to slow the traffic on Gardner St. may help mitigate drivers speeding south on Gardner St. to beat the stoplight on Fountain Ave. The speeding of drivers has resulted in many accidents at the corner of Gardner St. and Fountain Ave.

Response R303-1

See **Master Response 20** for the EIR analysis and conclusion regarding mobility improvements to the NEN to increase safety. No roadway widening would be required for improvements on the NEN. Aesthetic enhancements included with mobility improvements would comply with the streetscape design guidelines that ensure visual compatibility which take into account the street designation and surrounding land uses.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R304

Dietrich Nelson
Dietrich Nelson & Associates, Inc.
510 W. Sunset Blvd, #1415
Los Angeles, CA 90046

Comment R304-1

Hollywood Boulevard between Highland and Orange

I have concerns about upgrading Hollywood Blvd., between Highland and La Brea to a VEN or BEN due to the increased number of street closures for events and film premieres. Bicyclists would be at great risk due to these events. Here is a list of closures thus far in 2015 that we know of that have happened or are scheduled:

- *Feb. 15 – 25: all lanes of Hollywood Blvd., between Orange and Highland closed for the Academy Awards.*
- *March 12 – 13: same street closure for film premiere*
- *March 17 – 20: same street closures for film premieres*
- *March 25 – 26: same street closure for film premiere*
- *March 26 – 27: same street closure for event*
- *March 29 – 31: same street closure for Van Halen outdoor concert at Jimmy Kimmel Show*
- *April 1 – 2: same street closure for film premiere*
- *April 11: multiple street closures including Hollywood for Hollywood Half Marathon*
- *April 13: Hollywood between Orange and Highland closure for event*
- *April 17 – 20: same street closure for film premiere*
- *April 28 – 29: same street closure for film premiere*
- *May 8 – 9: same street closure for film premiere*
- *May 21 – 22: same street closure for film premiere*

Hollywood as a PEN: The sidewalks on both the north and south side of Hollywood between Highland and Sycamore are overwhelmed with tourist and costumed characters making it difficult for additional pedestrian traffic. Many times the only option is to walk in the gutter in order to get through the crowds.

Hollywood Boulevard between La Brea Avenue and Laurel Canyon

I recommend Hollywood Blvd. between La Brea and Laurel Canyon not be considered for upgrading to a BEN or VEN for the following reasons:

- *Hollywood Blvd. narrows tremendously through this residential neighborhood. Between 9 am and 4 pm (and after 7 pm) there is only one lane in each direction with the curb side lanes used by apartment dwellers. Many of the older apartment buildings do not have parking.*
- *Hollywood Blvd. is a narrow street and creating a protected bicycle lane would have a tremendous impact on traffic.*
- *The residents in the Hollywood Hills in the area will not be abandoning their cars to ride bicycles due to the distance from their homes to Hollywood Blvd. and the steep roads as well as the aging of the community.*
- *Garbage and recycle trucks use the curb lanes to pick up the large dumpsters from all the apartment buildings each week rendering the curb lane impassible for bicyclists.*
- *Hundreds of vehicles exiting the feeder streets and apartments/homes throughout the day between La Brea and Laurel Canyon have blind spots due to the line of palm trees on Hollywood Blvd. and cannot see if traffic is clear of bikes and vehicle traffic without pulling into the intersection. This would be extremely dangerous for bicyclists on Hollywood Blvd.*

- *The majority of cars and bicyclists traveling west on Hollywood Blvd. use the left hand turn lane at Fairfax. Increasing bicycle traffic by making Hollywood a BEN has the potential of being a death trap as cyclists needing to go from a protected right lane to the left turn lane.*
- *Moving trucks at apartment building are constantly using the curb lane of Hollywood and have no other option since the driveways of these buildings are too small for their vehicles.*
- *Mothers in their vehicles line up on Hollywood Boulevard west of Fuller every afternoon to pick up their children attending the school at Temple Israel.*

Sunset Boulevard between La Brea and Hayvenhurst

- *Creating a BEN on Sunset would be easier than Hollywood Blvd., however, the businesses depend on street parking for patrons and for delivery trucks (commercial, USPS, FedEx, etc.) and creating a protected bicycle lane will create a hardship on these businesses.*
- *There are major in-fill high rise buildings planned on Sunset Blvd. (7500 W. Sunset and 8150 W. Sunset) which will increase traffic, whether it's vehicle, motorcycle or bicycle. Additional construction is planned but has yet to be filed with Planning.*
- *Sunset Boulevard becomes the default for traffic when film premieres and events occur and closes Hollywood Boulevard between La Brea and Hollywood. During every closure, east bound traffic backs up from Highland to La Cienega and it can take 30 minutes or longer to travel that distance.*

Response R304-1

See **Master Response 21** regarding designations along Hollywood and Sunset Boulevards. See **Master Response 22** on the EIR's scope/level of analysis at the programmatic level. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R304-2

Gardner Street between Hollywood Boulevard and Fountain Avenue

- *Gardner is not very wide between Hollywood and Fountain and there is no space to widen the street.*
- *Gardner Elementary School is located at Gardner and Hawthorn, a block south of Hollywood Blvd. and, like Temple Israel's school, parents line up in the morning and evening to deliver and pick up their kids who attend the school.*
- *LAFD Station 41 is located on Gardner just south of Sunset and is the primary responder to most of Hollywood including many areas of the Hollywood Hills.*
- *The school and fire station will make it difficult for Gardner to become a BEN.*
- *Every weekday evening, northbound traffic on Gardner is like a parking lot between Santa Monica and Sunset Blvd. There is no left turn lane at Sunset creating further back up.*

Fairfax Avenue between Hollywood and Sunset

- *This area is R-1 with home located on either side of Fairfax and street parking is essential.*
- *Northbound rush hour traffic planning on turning right on Hollywood Blvd. begins queuing in the right lane near Fountain Avenue due to the number of vehicles planning to turn right.*

I live on Nichols Canyon a mile north of Hollywood Boulevard with no access to public transportation and due to spinal issues I'm unable to ride a bike or walk any great distance. Also, Nichols Canyon's topography is extremely steep making it a strenuous bike ride or walk for me.

Response R304-2

See **Response R303-1** for details regarding Gardner Street and **Master Response 21** for details regarding Fairfax Avenue. Access is the service name of the ADA Complementary Paratransit service for functionally disabled individuals in Los Angeles County. Access transportation service is available for any ADA paratransit eligible individual to any location within $\frac{3}{4}$ of a mile of any fixed bus operated by the Los Angeles County public fixed route bus operators and within $\frac{3}{4}$ of a mile around Metro rail stations during the hours that the systems are operational.

See **Master Response 22** on the EIR's scope/level of analysis at the programmatic level. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R305

Fran Offenhauser
8630 Hillside Ave
Los Angeles, 90069
Offenhauser@oma-la.com

Comment R305-1

Thank you for the opportunity to comment on the Mobility Plan 2035 Recirculated Draft EIR. I request that you keep the comment period open for another 2 weeks. This is a very important plan with significant consequences for neighborhoods and historic preservation in Hollywood. I apologize for not having reviewed this plan in detail.

Response R305-1

See **Response R301-1** regarding the public review period.

Comment R305-2

As an overall comment, I see the laudable thought and care that went into a City-wide task of refocusing Los Angeles streets from pure auto corridors to humane city streets. Because of the limited time for review, however, the reality of this plan's effects on existing built-out neighborhoods and historic commercial corridors isn't possible to gauge. Only if these proposed standards are overlain on the existing conditions can the real effect be known, and the reality of the standards tweaked so as to avoid future conflict with existing infrastructure (as an example, the Walk of Fame in Hollywood).

If there isn't a requirement in the DEIR to conduct this overlay, I believe that in the FEIR it should be done. Alternatively, the FEIR could state that implementation will be delayed until this is done.

Response R305-2

See **Master Response 1** regarding the traffic impact analysis methodology and conservative vehicle-centric assumptions. See **Response R301-1** regarding the public review period. The MP 2035 is a programmatic EIR and since the exact details of the individual designs for mobility improvements have not been developed at this time, an overlay is not possible. The EIR analyzes the proposed project with respect to the impact compared to existing conditions (see **Response 305-3** regarding the updated existing conditions in the Final EIR).

See **Master Response 22** on the EIR's scope/level of analysis at the programmatic level. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R305-3

The data which appears to be utilized for traffic studies in Hollywood appears outdated, as it is from 2008 and there has been significant new construction and entitlement in this area since then. Multiple traffic studies have been issued by the Planning Department, modeling Hollywood's new large scale developments, with traffic mitigations, intersection failures, etc etc. At least for Hollywood, where the infrastructure is critically strained, accuracy before adoption appears critical.

If there isn't a requirement in the DEIR to update this analysis, I believe in the FEIR it should be done.

Response R305-3

As part of the Final EIR, the traffic operations analysis for City roadways was updated to reflect Year 2014 conditions. The updated LOS did not result in any changes to the impacts related to traffic operations (**Impact 4.1-2**) or corresponding Mitigation Measures **T1** and **T2**. Refer to Corrections and Additions for pages 4.1-14, 4.1-15, and 4.1-32 through 4.1-34.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R305-4

I am concerned that the mobility plan is developed in isolation, without specific neighborhood, parking, and building protection elements. In Hollywood-- with fully developed streets and neighborhoods-- giant construction projects are getting new entitlements. Changing street classifications and design which affects residential and historic areas is cart-before-the-horse, unless the plan is completed with a conscious, stated, fact-based, designed neighborhood protection plan, with mapping of historic buildings and sidewalks, and with a parking replacement plan.

In the past--for example with Hollywood and Highland --City Planning imposed neighborhood protection requirements on major development projects. Right now enormous projects are being approved in Hollywood as if in a vacuum. The effects resulting from them are treated from a traffic perspective, rather than a neighborhood, parking, and historic building protection perspective.

Having the protection elements added now or before adoption of this Plan seems critical to directing decision-makers and Planning personnel in the right direction, when they must decide on mitigations or fees for seemingly unmitigatable traffic impacts.

Response R305-4

The MP 2035 is programmatic in nature and addresses change issues at a very broad level, without the benefit of detailed design for specific improvements. The focus of the plan is on changes to street function and capacity to accommodate and balance all modes. The MP 2035 is designed to serve adopted growth levels and, as such, the plan itself is not the direct or indirect impetus to growth. Demands for other services or infrastructure would occur with or without the MP 2035. See **Master Response 3** for the EIR analysis and conclusion related to parking and **Master Response 1** regarding the traffic impact methodology, **Master Response 15** for the EIR analysis and conclusion regarding transportation performance metrics, and **Master Response 22** for the EIR analysis and conclusion explaining why the scope/level of analysis is appropriate.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R305-5

In specific:

- *Hollywood Boulevard and the Walk of Fame is a highly specialized street section. Going by memory, the Walk of Fame is 14', and planned in this Plan at 15'. Its very likely I am wrong, but I offer it as an example of the need to test the street standards against the actual special conditions. If that testing was done to arrive at the street standards, it would be valuable to include that information.*
- *The proposed BEN should be removed from the Mobility Plan 2035 for Hollywood Blvd west of La Brea Ave (La Brea to Fairfax). This BEN segment would convert one of only two existing lanes on Hollywood Blvd to*

a bike lane/cycle-track and remove residential parking. Hollywood Blvd west of La Brea (between La Brea and Laurel Canyon) is residential only with two (2) vehicle travel lanes during AM and PM peak hours and only one (1) vehicle travel lane during non peak hours.

- *This will cause increased cut-through traffic, negatively impacting the residential neighborhoods North and South of Hollywood Blvd, especially during A.M. and P.M. peak hours and eliminate critically needed residential parking and make unsafe conditions at apartment building driveways on Hollywood Blvd, west of La Brea.*
- *This will cause increased traffic on the business section of Hollywood Boulevard. Because of the heavy tourism and pedestrian crossing times, as well as street closures, this is not a wise move.*
- *Sunset Boulevard, Hollywood Boulevard, Fountain Avenue and other residential streets in this area cannot support further widening. Current street width should be maintained. The widening of any streets west of La Brea would further reduce already narrow sidewalks. This would create unsafe conditions for all pedestrians. No street widening west of La Brea to the City of West Hollywood boundary. Widening streets at the expense of safe sidewalks is putting the needs of commuters at the expense of the residents of this area.*
- *The proposed VEN on Sunset Blvd west of La Brea to the City of West Hollywood boundary should be removed from the proposed Mobility Plan 2035 : The proposed treatments for Vehicle Enhanced Network (VEN) are as follows: Remove parking from Sunset Blvd - Increase vehicle speed - Limit turning movements to residential streets - Prohibit utility work, Construction and Filming during weekdays. Work to be performed at night. Sunset Blvd west of La Brea is primarily residential anchored by two historic single family neighborhoods Spaulding Square HPOZ and Sunset Square HPOZ and multi family neighborhoods, and more housing is being constructed.*
- *Encouraging through traffic is a bad idea. The narrow commercial strip that lines Sunset Blvd west of La Brea is older and of a historic character consisting mostly low rise one and two story structures with lower intensity. The majority of the commercial buildings on Sunset Boulevard have little to no on-site parking for their employees and patrons. Removing parking without a Parking Replacement Plan will force parking on to neighboring side streets, which have permit parking.*
- *Removing vehicle parking and stopping on Sunset Blvd west of La Brea would force valet set-up, drop off-pick up on to the residential streets and in front of private homes and residences. Valet operations on residential streets in front of residential properties would adversely impact the quality of life by creating traffic hazards, loss of peaceful enjoyment, blocking private driveways, create hazardous traffic conditions and unbearable late night noise and headlight glare in the neighborhoods.*
- *I have not had the opportunity to study the proposals for Franklin or Fountain Avenues, but these are highly specialized cases going through significant historic areas with narrow sidewalks. Please overlay your recommendations for these on to mapping of current conditions prior to issuing the FEIR.*

I appreciate your ambitious attempt to wrestle with the current insufficient infrastructure, but in the case of Hollywood it is critical that the cure is not worse than the disease.

Response R305-5

The City received many comments regarding the proposed Enhanced Networks (BEN, VEN, NEN) in the Hollywood area. A majority of the commenters believed that implementing the network treatments would create detrimental traffic impacts for the neighborhood and local businesses. **Master Response 21** describes the changes made to the MP 2035 Enhanced Networks in Hollywood.

See **Master Response 22** on the EIR's scope/level of analysis at the programmatic level. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R306

Gail Natzler
grinon@earthlink.net

Comment R306-1

The method by which the City is apparently trying to sneak this past stakeholders leads my neighbors and myself to not trust the whole plan. There needs to be a clear and open presentation, and dialog, with much feedback from neighborhoods which would be affected. So far, that has not been done! The main reply has been not to worry about it because it will not be until 2035! This response is a copout!

Response R306-1

See **Master Response 6** for the EIR analysis and conclusion regarding public participation.

Comment R306-2

What little I do understand about this complicated plan is that bicycle lanes would be between parked vehicles and the curb. This would prevent their drivers and bicyclists from seeing each other and lead to a false sense of security for the cyclists, dangerous, especially at all intersections where vehicles may be making turns and need bicycles to be visible.

It seems that the City is not aware that vehicles are here to stay. We need wider streets, not narrower! The closest bus lane to my home is more than half a mile away. So I can not use busses. NEED much more increased METRO PARKING The closest two Metro stations are much farther, and they never have space for me to park my car, So I can not use the Metro. I can not use the Hollywood Freeway to go downtown because it is always obstructed and slows to 5mph. Please make the Hollywood Freeway wider, to accommodate traffic. Placing a park over it, for example, would make future improvements to it difficult. And any additional parks would waste water we do not have in this problematic drought state. Any plans in the status quo need to provide better transit for vehicles, as well as much increased parking in areas where personal vehicles and public transit interface

Please do not add to the population density of Hollywood!

Response R306-2

The implementation of bicycle facilities associated with the MP 2035 is anticipated to improve safety and health outcomes for bicyclists and other road users. **Master Response 1** provides additional information to explain the traffic impact methodology and **Master Response 13** provides information for the EIR analysis and conclusion on bicycle safety. See **Master Response 5** for the EIR analysis and conclusion of growth-inducing effects. The provision of additional parking and a wider Hollywood Freeway are outside the scope and jurisdiction of this project.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR, including supporting the conclusion that there will be additional conflicts between bikes and vehicles. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R307

Jim Geohan
bangzoomer@aol.com

Comment R307-1

I have lived in Whitley Heights for 27 years which is quite near the Hollywood Bowl. Page 82 of the Hollywood Mobility Plan shows the addition of a subway (train) stop at the Hollywood Bowl. There is already a stop just south of there. What this would bring to our neighborhood is an influx of crime, drugs and a homeless population.

Response R307-1

The MP 2035 describes a subway stop at the Hollywood Bowl as a future regional transit connection (to be implemented by Metro, a separate public agency with its own environmental review process) to be consistent with other future regional plans; however, this connection is not identified on the Transit Enhanced Network for the MP 2035 and is not evaluated in the EIR. Separate environmental review addressing specific design considerations, would be required for this connection before such a stop would be approved.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R308

James McFadden
lajmac@aol.com

Comment R308-1

I am concerned about any plan to reduce parking and lanes on Hollywood Blvd. to make room for bike lanes. I have lived on N Ogden Dr 2 houses north of Hollywood Blvd for 27 years. In the morning and evening with 2 lanes open for traffic it is like a small freeway. Most of these people are coming and going from the valley and beyond and speeding. To reduce lanes during peak hours would cause grid lock. Also there is not enough parking in the area for all the people living in all the apartment buildings that don't have enough onsite parking. I ride my bike in the area and the idea that people will ride a bike from the Valley down Cahuenga to Franklin then La Brea and Hollywood Blvd to continue down Fairfax is ridiculous. The distance is too far, too hilly and too dangerous. Even with a bike lane there are still too many bad and distracted drivers on cell phones and not paying attention making bike riding dangerous. As much as I would like to ride my bike more in my neighborhood it would not be for commuting to work. I have done it and often it is too hot. Bike lanes down Hollywood Blvd is a bad idea. Any other east west street would be more suitable. How about the wider Sunset Blvd or Santa Monica Blvd. Or less traveled roads like Willoughby or Fountain. This plan needs more study.

Response R308-1

See **Master Response 21** for details regarding the designation on Hollywood Boulevard. Hollywood Boulevard between Fairfax Avenue and La Brea Boulevard has been removed from the BEN.

See **Master Response 22** on the EIR's scope/level of analysis at the programmatic level. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R309

Jim Stevely
agave8@yahoo.com

Comment R309-1

I do not want to see Venice Blvd in Mar Vista becoming a one lane road. The bike lanes have made traffic even worse. Ocean Park Blvd is a prime example. When people in cars can't drive then they end up cutting thru the neighborhoods. Please do not make Venice Blvd smaller.

Keep two big CAR lanes both ways. How about making bike routes? Many cities have back roads that are for the bikes to safely use. Palm Springs for one.

Response R309-1

Venice Boulevard in the Mar Vista area is designated as part of the TEN and BEN. Under a worst case scenario, the MP 2035 treatments would not result in the removal of more than one travel lane per direction. Therefore, two travel lanes per direction would continue to service vehicles along Venice Boulevard. **Master Response 1** includes additional information on the traffic impact methodology and **Master Response 22** provides detail explaining why the scope/level of analysis is appropriate.

Letter No. R310

John B. Campbell
2424 Castilian Dr
Los Angeles, CA 90068
2013johnncampbell@gmail.com

Comment R310-1

While I have no doubt the plan is well intended but what it lacks is the hands on introduction to the neighborhood. It's one thing for an engineer to look at a map of Hollywood Blvd. and say we can add a bike lane from La Brea to Fairfax or Laurel Canyon and it will increase mobility for non--vehicular traffic. Indeed it would – but the reality of actually walking the street, examining the lack of parking along the stretch of Hollywood Blvd. and the amount of residential occupancy makes it clear that such a bike lane will only contribute to the gridlock that exists during rush hour. Already it is a very real concern about the ability of emergency vehicles to respond during peak traffic hours.

What would happen if there were a brush fire in the Hollywood Hills between Highland and Laurel Canyon at 6PM or 8 AM?

Besides Emergency Response Time another consideration for these proposed changes involves zoning and property values. While there is no direct linkage between the Mobility Plan and future development, there is added benefit to the developers as they continue to expect zoning changes to accomplish their goals. These changes will create justification for the overdevelopment of specifically the corner of La Brea and Hollywood Blvd. where New York developers want to erect 3 buildings, one in excess of 270', where it is now zoned for a maximum height of 45'.

This plan will provide the developer with fuel to push through their plans for the site because of the BEN for Hollywood Blvd. Why else would they now be proposing parking for 400+ bicycles in their development? By adding "public good" details to their design such as affordable housing and bicycle parking to their plans it only allows them to avail themselves of further zoning concessions when presenting their plan.

Singles in the recently completed projects along La Brea are renting for \$2,300 --- \$2,700 a month. How many of the people who can afford to pay this much for a basically one--room apartment will rely solely on bicycle transportation? Their plan at present is to add 410 units to this corner that is already rated "F" in any traffic analysis. "No Significant Change" will be on their DEIR which only means it's horrible now and it will stay horrible.

Sixteen years ago I purchased my property in Outpost Estates with the reasonable expectation that the neighborhood would remain more or less stable in terms of densification and quality of life. These changes will create a land locked neighborhood impeding resident's ability to get to work and run errands throughout the day. This can only hurt our property values. Already I am forced because of the impossible traffic to travel over Mulholland to Studio City or Burbank to perform tasks.

Why do we find ourselves in a position to have to pursue legal options in order to get our elected officials to abide by current zoning in our neighborhood? Why does the City Attorney hire outside counsel with our tax dollars to fight our reasonable expectation that the City abide by it's own zoning?

Thank you for the opportunity to comment on the Mobility Plan 2035 ---Recirculated Draft EIR.

As an overall comment, the data which appears to be utilized for traffic studies in this area would be outdated as they are from 2008 and there has been significant construction in this area since then.

The studies also do not address the numerous times when Hollywood Boulevard is closed and/or when the Hollywood Bowl is holding events at which time traffic is gridlocked and public transportation is rerouted or is inaccessible.

Hollywood Blvd --- West of La Brea --- Proposed Bicycle Enhanced Network (BEN) We are opposed The proposed BEN should be removed from the Mobility Plan 2035 for Hollywood Blvd west of La Brea Ave (La Brea to Fairfax).

This BEN segment would convert one of only two existing lanes on Hollywood Blvd to a bike lane/cycle--- track and remove residential parking. Hollywood Blvd west of La Brea (between La Brea and Laurel Canyon) is residential only with two (2) vehicle travel lanes during AM and PM peak hours and only one (1) vehicle travel lane during non peak hours.

Adding a bike lane--cycle track by converting one vehicle/parking lane would have negative impacts on the area including the following:

- *Further impede already heavy traffic flow on residential Hollywood Blvd.*
- *Cause increased cut--through traffic, negatively impacting the residential neighborhoods North and South of Hollywood Blvd, especially during A.M. and P.M. peak hours. ..*
- *Eliminate needed residential parking on Hollywood Blvd, west of La Brea ..*
- *Reduce vehicle travel to only one lane in each direction, causing extreme back--up in the residential neighborhood from hillside and commuter traffic. ..*
- *Residential Hollywood Blvd is further burdened by frequent street and lane closures on Hollywood Blvd east of La Brea for events, movie premieres, Academy Awards, L.A. Marathon, Christmas Parade, Festivals, Half Marathons, in addition to the Hollywood Bowl season. Events, street and sidewalk closures should be addressed and included as part of the Draft EIR. ..*
- *Converting the curb lane to protected bike lane--cycle tracks on Hollywood Blvd through the residential neighborhood would obstruct safe access for bikes and residents trying to get in and out of their homes. Residential buildings only have ingress and egress to their homes on Hollywood Blvd. ..*
- *Placement of a bike lane on Hollywood Blvd would obstruct and or prevent all trash receptacles and garbage dumpsters from being put out and collected. ..*
- *Bikes on residential Hollywood Blvd would have to merge into vehicle travel lane during times when trash bins and dumpsters are set out waiting to be collected by garbage trucks. ..*
- *Delivery trucks, mail trucks and maintenance service vehicles services the homes on Hollywood Boulevard and would lose access as well as create increased hazards. ..*
- *Obstructing residential access would create unsafe conditions for vehicles and bikes and a potential liability for the City of Los Angeles.*
- *More traffic gridlock and the addition of a bike lane on residential Hollywood Blvd would further reduce emergency response time to the abutting hillsides, a High Fire Hazard Danger Zone.*

Street Widening of Sunset, Hollywood Boulevard, Fountain and any others: Opposed

Sunset Boulevard, Hollywood Boulevard, Fountain Avenue, Franklin Ave. and other residential streets in this area cannot support further widening. Current street width should be maintained. The widening of any streets west of La Brea would further reduce already narrow sidewalks. This would create unsafe conditions for all pedestrians. No street widening west of La Brea to the City of West Hollywood boundary. Widening streets at the expense of safe sidewalks is putting the needs of commuters at the expense of the residents of this area.

Fairfax avenue/Hollywood and Hollywood Boulevard/La Brea are designated as pedestrian enhanced networks. There is no explanation of what this means but both of these intersections, especially Hollywood/La Brea are

already overly congested. Hollywood/La Brea is gridlocked often during both the A.M. and P.M. peak hours and is the end point for traffic when Hollywood Boulevard is closed, as it frequently is.

Fairfax Ave --- Proposed Street Designation Change to: Boulevard l

Do not increase speed on Fairfax Ave north of Fountain Ave to target speed of 40 miles per hour. Maintain or reduce speed on Fairfax Ave. Fairfax Avenue north of Fountain to Hollywood Boulevard is residential and a portion is a part of the Sunset Square HPOZ.

Sunset Blvd --- West of La Brea Proposed Vehicle Enhanced Network (VEN)

Sunset Blvd west of La Brea to the City of West Hollywood boundary should be removed from the proposed VEN --- Mobility Plan 2035

The proposed treatments for Vehicle Enhanced Network (VEN) are as follows: Remove parking from Sunset Blvd --- Increase vehicle speed --- Limit turning movements to residential streets --- Prohibit utility work, Construction and Filming during weekdays. Work to be performed at night.

Sunset Blvd west of La Brea is primarily residential anchored by two historic single--family neighborhoods Spaulding Square HPOZ and Sunset Square HPOZ and multi family neighborhoods.

The neighborhoods, north and south of Sunset Blvd are unique residential with many families with small children and seniors who walk on and cross Sunset Blvd regularly. Gardner Elementary School is located on Gardner Street at Hawthorne just north of Sunset.

Residential use starts just fifty to one hundred feet from Sunset with minimal to no buffer between residential and commercial uses on Sunset Blvd west of La Brea to the City of West Hollywood border. The narrow commercial strip that lines Sunset Blvd west of La Brea is older and of a historic character consisting mostly low rise one and two story structures with lower intensity earlier closing uses. The majority of the commercial buildings on Sunset Boulevard have little to no on--site parking for their employees and patrons.

Local residential streets cannot support or accommodate additional parking for employees, patrons, delivery trucks, valet parking set up if parking is eliminated on Sunset Boulevard.

The proposed VEN for Sunset Blvd west of La Brea will encourage more traffic and increased speed greatly diminishing the quality of life for the neighborhood as well as impacting the small commercial establishments currently on Sunset Boulevard whose patrons will have no parking.

Parking: Do not remove parking form Sunset Blvd west of La Brea. ..

- *Removing parking from Sunset Blvd, west of La Brea would put our local businesses out of business. The majority of the commercial structures along Sunset are, older "grandfathered" historic structures. Many are local mom & pop businesses that share often little to zero on--site parking for their employees and patrons.*
- *The removal of parking and as well as "stopping" for our small businesses on Sunset Blvd would cause great harm to the small local businesses and effectively eliminate businesses from taking delivery of goods and services. Deliveries should continue to take place on Sunset Blvd west of La Brea and Not on residential streets. ..*
- *Residential streets along Sunset Blvd in no way can accommodate more employee and patron parking or valet set up, drop off and pick up or commercial delivery trucks on the narrow street and in front of private residence. ..*

- *Prohibiting parking, valet and delivery trucks from Sunset Blvd would force all these uses to stage in front of residential homes, on residential streets 24/7. This intrusion would not be protecting neighborhoods or conform to the elements of the General Plan or either version of the Hollywood Community Plan. ..*
- *The residential streets off Sunset Blvd currently are too narrow to accommodate garbage trucks and pass through vehicles at the same time. If the garbage truck is on the street, vehicles must back out off the street, or wait a long while to pass through. ..*
- *Removing vehicle parking and stopping from Sunset Blvd west of La Brea would force valet set--up, drop off--pick up on to the residential streets and in front of private homes and residence. Valet operations on residential streets in front of residential properties would adversely impact the quality of life by creating traffic hazards, loss of peaceful enjoyment, blocking private driveways, create hazardous traffic conditions and unbearable late night noise and headlight glare in the neighborhoods.*

Limited and Restricted Turning Movements: The Draft EIR fails to provide detail and or any specific information as to exact streets and intersections where, how and when turns would be restricted for the proposed VEN designation on Sunset Blvd west of La Brea.

Increased Speed Proposed--Sunset Blvd: Do not increase speed on Sunset Blvd west of La Brea. ..

- *The proposed VEN for Sunset Blvd west of La Brea will result in increased traffic and congestion and adversely impact the quality of life in surrounding neighborhoods that are residential. ..*
- *Sidewalks along Sunset Boulevard are narrow and don't have any buffer between vehicles other than the parked cars. Children are crossing Sunset at Gardner Street going to school. ..*
- *Any increased speed on Sunset increase dangerous conditions for all pedestrians. ..*
- *Increased vehicles speed will increase noise on and from Sunset Blvd. Residential uses are 50 feet off Sunset and will be negatively impacted by increased noise. ..*
- *Current posted speed on Sunset Blvd is 35 mph and should not be increased. If any changes are contemplated to improve the quality of life in the neighborhood, the speed should be decreased.*

Response R310-1

Master Response 14 provides information for the EIR analysis and conclusion on emergency vehicle access and response times. The EIR determined that a potentially significant and unavoidable impact would occur to emergency access and response times. The MP 2035 is not proposing any land use changes in the City. In accordance with Section 15125.2(d) of the CEQA Guidelines, the growth-inducing impacts of the MP 2035 are considered in EIR **Section 6.3 Other CEQA Considerations**. The MP 2035 is designed to serve adopted growth levels and, as such, the plan itself is not the direct or indirect impetus to growth. Demands for other services or infrastructure would occur with or without the MP 2035. See **Master Response 21** for the EIR analysis and conclusion regarding the designation on Hollywood Boulevard and age of traffic study, which was updated to reflect 2014 conditions (see **Section 3 Corrections and Additions** on pages 4.1-15, 4.1-15 and 4.1-32 through 4.1-24).

See **Master Response 22** on the EIR's scope/level of analysis at the programmatic level. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R311

Joyce Dillard
dillardjoyce@yahoo.com

Comment R311-1

The REQUIREMENTS and the GOALS AND OBJECTIVES do not match.

OPR UPDATE TO THE GENERAL PLAN GUIDELINES: COMPLETE STREETS AND THE CIRCULATION ELEMENT states:

The circulation element is not limited to transportation network issues. For the purpose of the circulation element, circulation includes all systems that move people, goods, energy, water, sewage, storm drainage, and communications. As a result, the circulation element should contain objectives, policies, and standards for transportation systems, including multimodal transportation networks, airports and ports, military facilities and operations, and utilities.

By statute, the circulation element must correlate directly with the land use element

And

Jurisdictions should also consider the housing, open space, noise, conservation, and safety elements.

And

A key factor in creating a successful multimodal transportation network is making sure the planning objectives, policies, and standards reflect the rural, suburban, and/or urban context of a community within the planning area. Rural, suburban, and urban areas have different growth and development patterns and therefore face different opportunities and challenges when designing a multimodal transportation network.

This report concentrates on only one aspect of the CIRCULATION ELEMENT and bypasses the intent of the legislation. This report reflects LOS ANGELES COUNTY transportation information and not information related to the COMMUNITY PLANS AKA THE LAND USE ELEMENT.

In fact, other than some percentage statistics thrown in, we see no relationship at all to correlate directly with the land use element. There is no consistency.

The Metro's Union Station Master Plan is not in the COMMUNITY PLANS, yet it is flagged as a key addition.

Response R311-1

See **Master Response 7** for the EIR analysis and conclusion regarding the General Plan Framework and **Master Response 16** for the EIR analysis and conclusion regarding the Circulation Element. See also **Master Response 1** regarding the traffic impact analysis methodology and conservative vehicle-centric assumptions. It is anticipated that both transportation infrastructure planning (as presented in the MP 2035) as well as future land use planning efforts (community plans, specific plans and occasionally individual projects), will be undertaken in an iterative manner. The MP 2035 will provide the framework for future community plans and specific plans that will take a closer look at the MP 2035 VEN, BEN, TEN and PED networks in specific areas of the City and may recommend more-detailed implementation strategies to realize the MP 2035. More detailed land use planning may reveal the need for changes to the networks, which will be undertaken as needed to reflect these more detailed planning efforts. See **Master Response 5** discussing the EIR analysis of growth inducing effects of the project.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the

RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R311-2

You weakly mention or fail to address many issues including:

- *Americans with Disabilities Act*
- *ATBCB Architectural and Transportation Barriers Board*
- *Equestrian Trails (historic, mapped and emergency-related)*
- *Movement of Tourists*
- *Purple Pipe Installation*
- *Oil Pipelines*
- *Natural Gas Pipelines*
- *Digester Gas Pipelines*
- *Pipeline Hazards*
- *Methane Seepage Hazards*
- *Fiber Optic Networks*
- *Stormwater Capture Devices*
- *MS4 Compliance including Water Quality Monitoring*
- *Emergency Travel Contingencies including Response and Recovery from Declared Disasters*
- *Military Routes*
- *Google Cars (Tech LA)*
- *Drones*
- *Pipeline Breakage due to Vibrations and Noise*
- *Sidewalks and Sidewalk Replacements including Trees*
- *Age and Replacement Costs*
- *Maintenance and Operational Costs*
- *Earthquake Readiness and Resiliency*

Coordination with the MPO Metropolitan Planning Organization SCAG Southern California Association of Governments is not evident. Their role may include:

- *conducting vulnerability analyses on regional transportation facilities*
- *analyzing transportation networks for redundancies in moving large numbers of people*
- *analyzing transportation networks for emergency route planning, including strategic gaps in the network and services*
- *ensuring that emergency transportation services are available to populations with special needs, such as the elderly, or those with disabilities; residents of institutionalized settings; children; those from diverse cultures, including individuals who have limited English proficiency or are non-English-speaking; or those who are transportation disadvantaged.*

Response R311-2

See **Master Response 1** regarding the traffic impact analysis methodology and conservative vehicle-centric assumptions. See **Master Response 5** for the EIR analysis and conclusion regarding growth-inducing effects and associated demand for infrastructure, **Master Responses 7 and 16** for the EIR analysis and conclusion regarding the relationship of the Circulation Element to other requirements of the General Plan. Interagency coordination with multiple agencies has occurred and will continue to occur throughout project development, including but not limited to, Big Blue Bus, California Department of Transportation, Culver City Transit, Foothill Transit, Metro, SCAQMD, and Metrolink. For modeling the transportation improvements, the City

of Los Angeles is divided into 1,411 Transportation Analysis Zones, each with corresponding socioeconomic data obtained through coordination with SCAG and connections to the roadway and transit networks. No land use changes or projects are being proposed as part of MP 2035, rather it is a conceptual plan for the City as a whole.

Finally, the commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. The commenter fails to explain how the analysis in the CEQA is inadequate by failure to discuss the listed items. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R311-3

This report is chatty, but does not reflect any of the true issues in Los Angeles such as the congestion, air quality, water quality and bicycle safety that now inhibits any safe and convenient travel throughout the city. Lack of proper congestion management increases delays in arrival times that effects economic growth.

Economic Feasibility Studies are needed.

The original STATE CLEARINGHOUSE NUMBER is 2012061092 under the title:

2012 Bicycle Plan's First Year of the First Five-Year Implementation Strategy and Figueroa Streetscape Project Mitigation and Monitoring Plan is not posted.

This plan is now being presented under STATE CLEARINGHOUSE NUMBER 2013041012 and under the title:

Mobility Plan 2035 (Alternative Title-Mobility Element Update)

We do not understand why the CIRCULATION ELEMENT is being piecemealed.

Response R311-3

The 2012 Bicycle Plan First Year of Five-Year Implementation Strategy and Figueroa Streetscape project and the MP 2035 are separate projects with different goals and objectives, each with independent utility from each other and were reviewed under separate EIR's with separate State Clearinghouse numbers.

See **Master Response 9** for the EIR analysis and conclusion on funding and implementation of the MP 2035. CEQA does not require that socioeconomic effects be addressed unless the socio-economic effect could lead to direct physical impacts. The CEQA analysis focuses on the physical environmental impacts of a project and not socioeconomic or monetary impacts. In making a decision as to whether to approve a project, decision-makers weigh a number of factors including the physical environmental impacts and other issues including socio-economic factors. See **Master Response 16** for the EIR analysis and conclusion regarding the requirements of the Circulation Element.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R311-4

Policies and conceptual-level improvements would not warrant an environmental document. You are not COMMUNITY PLAN, GENERAL PLAN and FRAMEWORK ELEMENT specific.

Response R311-4

See **Master Responses 7 and 16** for the EIR analysis and conclusion regarding the relationship of the Circulation Element to other requirements of the General Plan, including the Framework Element. The MP 2035 is programmatic in nature and addresses change issues at a very broad level, without the benefit of detailed design for specific improvements. The focus of the plan is on changes to street function and capacity to accommodate and balance all modes and the EIR characterizes the environmental effects of these proposed classifications of mobility improvements. Since MP 205 is a project under CEQA, environmental review is required.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R311-5

We disagree. The FRAMEWORK ELEMENT needs to be recognized and this plan incorporated to all aspects of MITIGATION AND MONITORING including INFRASTRUCTURE REPORT CARDS.

Response R311-5

See **Response R311-4**. See **Master Response 1** regarding the traffic impact analysis methodology and conservative vehicle-centric assumptions. The commenter seeks to link infrastructure and related services to the proposed MP 2035. The MP 2035 aims to create a programmatic approach to the function of city streets and to improve travel efficiency for a variety of modes for years into the future. The MP 2035 is designed to serve adopted growth levels and, as such, the plan itself is not the direct or indirect impetus to growth. Demands for other services or infrastructure would occur with or without the MP 2035.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R311-6

We disagree. You have failed to include the following:

- *Americans with Disabilities Act*
- *ATBCB Architectural and Transportation Barriers Board*
- *Equestrian Trails (historic, mapped and emergency-related)*
- *Movement of Tourists*
- *Purple Pipe Installation*
- *Oil Pipelines*
- *Natural Gas Pipelines*
- *Digester Gas Pipelines*
- *Pipeline Hazards*
- *Methane Seepage Hazards*
- *Fiber Optic Networks*
- *Stormwater Capture Devices*
- *MS4 Compliance including Water Quality Monitoring*
- *Emergency Travel Contingencies including Response and Recovery from Declared Disasters*
- *Military Routes*
- *Google Cars (Tech LA)*

- *Drones*
- *Pipeline Breakage due to Vibrations and Noise*
- *Sidewalks and Sidewalk Replacements including Trees*
- *Age and Replacement Costs*
- *Maintenance and Operational Costs*
- *Earthquake Readiness and Resiliency*

We do not see the incorporation of Watershed Plans, MS4 Permits and Water Quality Monitoring into Total Daily Maximum Load reductions and compliance. ALL watersheds are affected, not just the Ballona Wetlands.

Response R311-6

See **Response R311-2**. The Ballona Wetlands was identified as one of three significant ecological areas located in proximity (200 feet) to the enhanced networks. As site-specific details for individual mobility improvements become available, additional environmental review will be undertaken that addresses the issues raised by the commenter (Compliance with Plans, Permits, and Monitoring) as appropriate.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R311-7

Alternatives are related only to those changes and not to the CIRCULATION ELEMENT necessary. No alternatives presented reflect a true picture of the compliance required by Government Code Section 65302 (b).

Response R311-7

See **Response R311-1** regarding the Circulation Element and required components. See **Master Response 12** for the EIR analysis and conclusion regarding project alternatives.

The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R312

John Coghlan
coghlanjohn@yahoo.com

Comment R312-1

We are advocating that the bike lanes be installed in the north side of the river so that the south side bank can retain its more natural surface and be safe for kids and dogs.

Response R312-1

Design characteristics of the Woodman to Hazeltine River/Nature Walk are not known at this time. The commenter's concerns/opinions regarding the BEN will be forwarded to the decision-maker for consideration in taking action on the proposed project. The additional policy ideas raised in this comment will be forwarded to the decision-maker for its consideration.

Letter No. R313

Joyce and Stanley Dyrector
jdyrector@aol.com

Comment R313-1

Cahuenga Blvd West traveling south into Highland Ave should definitely NOT have a bike lane. It is too dangerous. There is the Hollywood Bowl season where 18,000 additional people converge on our streets. There is also the Ford Theatre on Cahuenga Blvd east. The cars, the Buses, the Limousines need to use all the lanes.

Response R313-1

The City received many comments regarding the proposed Enhanced Networks (BEN, VEN, NEN) in the Hollywood area. A majority of the commenters believed that implementing the network treatments would create detrimental traffic impacts for the neighborhood and local businesses. **Master Response 21** describes the changes made to the MP 2035 Enhanced Networks in Hollywood.

Comment R313-2

The constant closures on Hollywood Blvd (The Oscars, the Premieres, the Marathon, the Half Marathon, the Demonstrations, the Jimmy Kimmel live events, etc.) affect our traffic negatively. We are already a Level F regarding traffic. The addition of bicycle lanes will just make the situation worse. This is very dangerous and will wind up causing many accidents, deaths, etc.

Response R313-2

The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

See **Master Response 22** on the EIR's scope/level of analysis at the programmatic level. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R313-2

Cahuenga Blvd East is not wide enough for bicycles to share the space with cars. And definitely there should be NO bike lanes on Franklin Avenue.

Response R313-2

The City received many comments regarding the proposed Enhanced Networks (BEN, VEN, NEN) in the Hollywood area. A majority of the commenters believed that implementing the network treatments would create detrimental traffic impacts for the neighborhood and local businesses. **Master Response 21** describes the changes made to the MP 2035 Enhanced Networks in Hollywood.

See **Master Response 22** on the EIR's scope/level of analysis at the programmatic level. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R313-3

Years ago I remember writing a letter against bike lanes on Highland Ave/Cahuenga Blvd from the Barham Bridge past the Hollywood Bowl. I see those letters were not taken into account.

Response R313-3

While public comments received are incorporated into the environmental record for projects, they are not carried forward for all future related projects. Please continue to resubmit comments specific to individual projects as future projects continue to develop.

Comment R313-4

Again, please allow more time for comments by the people who actually live in the areas and understand the traffic flow more than the people who put this plan together and do not drive our streets on a daily basis.

Response R313-4

See **Response R301-1** regarding the public review period.

Letter No. R314

Ken Koonce
kkoonce@roadrunner.com

Comment R314-1

After attending the meeting tonight at Bonham's, I left confused about the exact plan and impact of the proposed bicycle lane on Hollywood Blvd between LaBrea and Fairfax. The details of the bike lane were very lacking. Will this bike lane mean the elimination of parking on Hollywood Blvd? If so, that would be absolutely ludicrous. Parking in the area is already impossible, and to lose parking on a major thoroughfare like Hollywood Blvd would make a bad situation worse.

If there is a bike lane, where are residents to place their trashcans on pickup days? Where are their guests supposed to park? Where are the thousands of people who live in apartment buildings going to have visitors park? Where are renters in old apartment buildings with limited parking garages supposed to put their extra vehicles? Where are members and visitors to St. Thomas Episcopal Church, Temple Israel, and the thousands of hikers who visit Runyon Canyon supposed to park now that other streets in the area are restricted to residents only? How are bicyclists and buses going to share the same curb space at bus stops?

Hollywood Blvd is a major east-west route and is already congested enough. To make it narrower for a few bicycles will only create more congestion. Los Angeles is not a compact European or East Coast city where bicycling is practical. We are a spread out, car oriented city. Please take this unworkable and impractical idea off the table.

Response R314-1

See **Master Response 21** regarding the designation on Hollywood Boulevard.

See **Master Response 22_** on the EIR's scope/level of analysis at the programmatic level. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R315

Kennon B. Raines
kraines@sbcgobal.net

Comment R315-1

As a resident of Hollywood for over twenty years and a member of the Hollywood Heights Association, I write out of concern regarding "Mobility 2035 ENV-2013-0911-EIR."

You have given us only 12 days to respond! WE NEED MORE TIME!

My recommendation is to EXTEND THE DEADLINE FOR OUR COMMENTS.

We are the people who engineers and urban planners are supposed to be serving. We need to be informed in a timely manner, so we can have meaningful input. Please give us more time and come back with a presentation that is clear, with power point projection and slides that we can see and follow. Please allow our voices to be heard.

Response R315-1

See **Response R301-1** regarding the public review period. A Notice of Availability for the RDEIR was filed with the State Clearinghouse, published in the newspaper, mailed to relevant agencies, and to persons submitting comments on the previous Draft EIR. The Draft EIR was circulated to the public for a 45-day public review period (February 19, 2015 to April 6, 2015).

Letter No. R316

Nazo L. Koulloukian, Esq.
Joseph Farzam Law Firm
7135 Hollywood Blvd., Unit 1108
Los Angeles, CA 90046

Comment R316-1

As an overall comment, the data which appears to be utilized for traffic studies in this area would be outdated as they are from 2008 and there has been significant construction in this area since then.

These studies do not address the numerous times when Hollywood Boulevard is closed and/or when the Hollywood Bowl is holding events at which time traffic is gridlocked and public transportation is rerouted or is inaccessible. I am personally grid locked in traffic 9 out of the 10 times I going to and coming from work every morning. This Mobility Plan will only take the current conditions into a tailspin and make it worse.

Response R316-1

See **Master Response 21** for details regarding the designation on Hollywood Boulevard and the age of the traffic studies, which were updated to 2014 conditions (see **Chapter 3.0 Corrections and Additions** on pages 4.1-15, 4.1-15 and 4.1-32 through 4.1-24).

Comment R316-2

This BEN segment would convert one of only two existing lanes on Hollywood Blvd to a bike lane/cycle-track and remove residential parking. Hollywood Blvd west of La Brea (between La Brea and Laurel Canyon) is residential only with two (2) vehicle travel lanes during AM and PM peak hours and only one (1) vehicle travel lane during non peak hours.

Adding a bike lane-cycle track, by converting one vehicle/parking lane would have negative impacts on the area including the following:

- 1. Further impede already heavy traffic flow on residential Hollywood Blvd.*
- 2. Cause increased cut-through traffic, negatively impacting the residential neighborhoods North and South of Hollywood Blvd, especially during A.M. and P.M. peak hours.*
- 3. Eliminate needed residential parking on Hollywood Blvd, west of La Brea*
- 4. Reduce vehicle travel to only one lane in each direction, causing extreme back-up in the residential neighborhood from hillside and commuter traffic.*
- 5. Residential Hollywood Blvd is further burdened by frequent street and lane closures on Hollywood Blvd east of La Brea for events, movie premieres, Academy Awards, L.A. Marathon, Christmas Parade, Festivals, Half Marathons, in addition to the Hollywood Bowl season. Events, street and sidewalk closures should be addressed and included as part of the Draft EIR.*
- 6. Converting the curb lane to protected bike lane-cycletracks on Hollywood Blvd through the residential neighborhood would obstruct safe access for bikes and residents trying to get in and out of their homes. Residential buildings only have ingress and egress to their homes on Hollywood Blvd.*
- 7. Placement of a bike lane on Hollywood Blvd would obstruct and or prevent all trash receptacles and garbage dumpsters from being put out and collected.*
- 8. Bikes on residential Hollywood Blvd would have to merge into vehicle travel lane during times when trash bins and dumpsters are set out waiting to be collected by garbage trucks.*

9. *Delivery trucks, mail trucks and maintenance service vehicles services the homes on Hollywood Boulevard and would lose access as well as create increased hazards.*
10. *Obstructing residential access would create unsafe conditions for vehicles and bikes and a potential liability for the City of Los Angeles.*
11. *More traffic gridlock and the addition of a bike lane on residential Hollywood Blvd would further reduce emergency response time to the abutting hillsides, a High Fire Hazard Danger Zone.*
12. *Make life difficult for all the residents who just want to live in a peaceful area.*
13. *Increase more chances of accidents and potential injury to cyclists, pedestrians, and drivers.*
14. *Kill any small amount of residential peace left in this area.*

***STREET WIDENINGS OF SUNSET, HOLLYWOOD BOULEVARD, FOUNTAIN AND ANY OTHERS:
OPPOSED***

These streets CANNOT support any more widening. Sunset Boulevard, Hollywood Boulevard, Fountain Avenue and other residential streets in this area cannot support further widening. Current street width should be maintained. The widening of any streets west of La Brea would further reduce already narrow sidewalks. This would create unsafe conditions for all pedestrians. No street widening west of La Brea to the City of West Hollywood boundary. Widening streets at the expense of safe sidewalks is putting the needs of commuters at the expense of the residents of this area.

FAIRFAX AVENUE/HOLLYWOOD AND HOLLYWOOD BOULEVARD/LA BREA are designated as pedestrian enhanced networks. There is no explanation of what this means but both of these intersections, especially Hollywood/La Brea are already overly congested. Hollywood/La Brea is gridlocked often during both the A.M. and P.M. peak hours and is the end point for traffic when Hollywood Boulevard is closed, as it frequently is.

FAIRFAX AVE - PROPOSED STREET DESIGNATION CHANGE TO: BOULEVARD L

Do not increase speed on Fairfax Ave north of Fountain Ave to target speed of 40 miles per hour. Maintain or reduce speed on Fairfax Ave. Fairfax Avenue north of Fountain to Hollywood Boulevard is residential and a portion is a part of the Sunset Square HPOZ.

SUNSET BLVD - WEST OF LA BREA PROPOSED VEHICLE ENHANCED NETWORK (VEN)

Sunset Blvd west of La Brea to the City of West Hollywood boundary should be removed from the proposed VEN - Mobility Plan 2035

The proposed treatments for Vehicle Enhanced Network (VEN) are as follows: Remove parking from Sunset Blvd - Increase vehicle speed - Limit turning movements to residential streets - Prohibit utility work, Construction and Filming during weekdays. Work to be performed at night.

Sunset Blvd west of La Brea is primarily residential anchored by two historic single family neighborhoods Spaulding Square HPOZ and Sunset Square HPOZ and multi-family neighborhoods.

The neighborhoods, north and south of Sunset Blvd are unique residential with many families with small children and seniors who walk on and cross Sunset Blvd regularly. Gardner Elementary School is located on Gardner Street at Hawthorne just north of Sunset.

Residential use starts just fifty to one hundred feet from Sunset with minimal to no buffer between residential and commercial uses on Sunset Blvd west of La Brea to the City of West Hollywood border.

The narrow commercial strip that lines Sunset Blvd west of La Brea is older and of a historic character consisting mostly low rise one and two story structures with lower intensity earlier closing uses. The majority of the commercial buildings on Sunset Boulevard have little to no on-site parking for their employees and patrons.

Local residential streets cannot support or accommodate additional parking for employees, patrons, delivery trucks, valet parking set up if parking is eliminated on Sunset Boulevard.

The proposed VEN for Sunset Blvd west of La Brea will encourage more traffic and increased speed greatly diminishing the quality of life for the neighborhood as well as impacting the small commercial establishments currently on Sunset Boulevard whose patrons will have no parking.

Parking: Do not remove parking from Sunset Blvd west of La Brea.

- 1. Removing parking from Sunset Blvd, west of La Brea would put our local businesses out of business. The majority of the commercial structures along Sunset are, older "grandfathered" historic structures. Many are local mom & pop businesses that share often little to zero on-site parking for their employees and patrons.*
- 2. The removal of parking and as well as "stopping" for our small businesses on Sunset Blvd would cause great harm to the small local businesses and effectively eliminate businesses from taking delivery of goods and services. Deliveries should continue to take place on Sunset Blvd west of La Brea and Not on residential streets.*
- 3. Residential streets along Sunset Blvd in no way can accommodate more employee and patron parking or valet set up, drop off and pick up or commercial delivery trucks on the narrow street and in front of private residence.*
- 4. Prohibiting parking, valet and delivery trucks from Sunset Blvd would force all these uses to stage in front of residential homes, on residential streets 2417. This intrusion would not be protecting neighborhoods or conform to the elements of the General Plan or either version of the Hollywood Community Plan.*
- 5. The residential streets off Sunset Blvd currently are too narrow to accommodate garbage trucks and pass through vehicles at the same time. If the garbage truck is on the street, vehicles must back out off the street, or wait a long while to pass through.*
- 6. Removing vehicle parking and stopping from Sunset Blvd west of La Brea would force valet set-up, drop off-pick up on to the residential streets and in front of private homes and residence. Valet operations on residential streets in front of residential properties would adversely impact the quality of life by creating traffic hazards, loss of peaceful enjoyment, blocking private driveways, create hazardous traffic conditions and unbearable late night noise and headlight glare in the neighborhoods.*

Limited and Restricted Turning Movements: The Draft EIR fails to provide detail and or any specific information as to exact streets and intersections where, how and when turns turns would be restricted for the proposed VEN designation on Sunset Blvd west of La Brea.

Increased Speed Proposed-Sunset Blvd: Do not increase speed on Sunset Blvd west of La Brea.

- 1. The proposed VEN for Sunset Blvd west of La Brea will result in increased traffic and congestion and adversely impact the quality of life in surrounding neighborhoods that are residential.*
- 2. Sidewalks along Sunset Boulevard are narrow and don't have any buffer between vehicles other than the parked cars. Children are crossing Sunset at Gardner Street going to school.*
- 3. Any increased speed on Sunset increase dangerous conditions for all pedestrians.*

4. *Increased vehicles speed will increase noise on and from Sunset Blvd. Residential uses are 50 feet off Sunset and will be negatively impacted by increased noise.*
5. *Current posted speed on Sunset Blvd is 35 mph and should not be increased. If any changes are contemplated to improve the quality of life in the neighborhood, the speed should be decreased.*

Please, if anyone at the City cares for the well-being and the future of this area, put a STOP to this. I moved here after I got married with my wife, and we expect to have children within the next year or two. If these proposed changes occur, any sign of raising my family in this area will be gone. These proposed changes are ludicrous and will be a detriment to any comfortable level of living left in this town. I beg you to please take my suggestions seriously.

Response R316-2

See **Master Response 21** for details regarding the designation on Hollywood and Sunset Boulevards and Fairfax and Fountain Avenues.

See **Master Response 22** on the EIR's scope/level of analysis at the programmatic level. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R317

Liza Marie Milat
7135 Hollywood Blvd., Apt. 410
Los Angeles, CA 90046
milatisamarie@gmail.com

Comment R317-1

- *Highway Designations – Both Franklin Avenue and Hollywood Boulevard in this area serve a primary function as collector streets for hillside dwellers. They along with La Brea and Fairfax Avenues should all be downgraded to Avenue III designations. All arterial traffic should be discouraged on this path to ensure emergency responsiveness to hillside residents.*
- *TEN Designations – Hollywood Boulevard west of La Brea is solely residential in character. Despite having major transportation hubs to the east, the public ROW cross-section dimensions of Hollywood Boulevard to the west are much smaller and essentially, this is a road to nowhere. However, since the next closest east/west street proposed as providing transit is Santa Monica Boulevard, I can understand how this section of Hollywood Boulevard is being designated as a Moderate Transit Enhanced Street. Perhaps the use of smaller buses and allowing only a single lane of traffic each way (for both bus and automobile traffic with automobiles stopping for the loading and unloading of bus passengers) would be appropriate for the scale and residential quality of this area.*
- *PED Designations – Because of the borderline collector / arterial street designations of these roads and because this is an area solely residential in character, any PED designations should be downgraded to NEN designations. Because of the topography in this area, walking and biking to a PED is unrealistic for a majority of local residents and therefore, the success of these intersections becoming vibrant centers is doubtful. The one mixed-use project in the neighborhood, The Avenue Hollywood, has yet to attract a single commercial tenant in the three years since its completion.*

Response R317-1

Master Response 18 contains a discussion of the EIR analysis and conclusion of the diversion of vehicles due to travel lane conversions and the potential for cut-through traffic. **Master Response 14** provides information for the EIR analysis and conclusion on emergency vehicle access and response times. The EIR determined that a potentially significant and unavoidable impact would occur to emergency access and response times. See **Master Response 21** for details regarding the designation on Hollywood Boulevard and Fairfax Avenue. It is anticipated that the City will respond to the various plans, programs and pressures to change development patterns and types and modes of transportation -- to reduce VMT and GHGs -- over the next 20 years. As development patterns and types continue to comply with new regulations and development pressures, and transportation options expand, it is anticipated that these changes will accelerate and will facilitate further changes.

See **Master Response 22** on the EIR's scope/level of analysis at the programmatic level. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R318

Mary Helen Berg
mhberg@sbcglobal.net

Comment R318-1

After attending a community meeting in Hollywood, it appears to me that this plan ignores the existence of thousands of residents in the Hollywood Hills. The area that hosts the symbol of Hollywood, the iconic sign, is ill-served by a plan that would basically--and dangerously--trap residents on their hillsides due to traffic congestion and force-feed an overwhelming number of cars down narrow hillside streets.

I would urge reconsideration before endangering lives and ruining quality of life in one of the city's most beautiful and symbolic neighborhoods.

Response R318-1

See **Master Response 21** for details regarding the designation on Hollywood and Sunset Boulevards and Fairfax and Fountain Avenues. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R319

Melissa Card
mcard89@yahoo.com

Comment R319-1

Please extend the deadline for the residents of this neighborhood to review and comment on the plan as we were only given 12 days to respond and this plan will have a significant impact on our community.

Response R319-1

See **Response R301-1** regarding the public review period. A Notice of Availability for the RDEIR was filed with the State Clearinghouse, published in the newspaper, mailed to relevant agencies, and to persons submitting comments on the previous Draft EIR. The Draft EIR was circulated to the public for a 45-day public review period (February 19, 2015 to April 6, 2015).

Letter No. R320

Patrick Micallef
tiquetloisir@icloud.com

Comment R320-1

I am a resident of the Hollywood Hills and I strongly support the bicycle enhanced alternatives. I do suggest that you keep an eye on the added vehicles coming through our residential streets to access the 101 freeway on Highland. I've had a car collide with mine backing out of my driveway. All cars speed through our streets. A solution is greatly welcomed.

Response R320-1

See **Master Response 18** for the EIR analysis and conclusion regarding cut through traffic. The commenter's concerns regarding vehicle speeds in the area have been forwarded to the decision-makers.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R321

Richard Barrow
rihcardbarrow1@yahoo.com

Comment R321-1

1. *Consider Sunset Blvd. rather than Hollywood Blvd. for bike path use.-Wider street with less traffic. Alternate traffic flow to Sunset rather than Hollywood down La Brea during certain hours and as that traffic goes on to Fairfax. This would take pressure off of the left hand turn on Hollywood turning south down Fairfax.*

Response R321-1

See **Master Response 21** for details regarding the designation on Hollywood and Sunset Boulevards.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R321-2

2. *Do not allow any additional traffic to enter from La Brea via Franklin going west from that intersection.*
 - A. *Area over used by those wanting to go to Runyon Park- both car traffic and pedestrians.*
 - b. *Maintain residential nature of the area.- no additional traffic or buses. Maintain slower speeds thru area.*

Response R321-2

The MP 2035 does not include potential access changes to residential communities in the City. **Master Response 18** contains information related to the diversion of vehicles due to travel lane conversions and the potential for cut-through traffic.

The City received many comments regarding the proposed Enhanced Networks (BEN, VEN, NEN) in the Hollywood area. A majority of the commenters believed that implementing the network treatments would create detrimental traffic impacts for the neighborhood and local businesses. **Master Response 21** describes the changes made to the MP 2035 Enhanced Networks in Hollywood.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R321-3

3. *MOST IMPORTANT---make infrastructure repairs (repair broken curbs, sidewalks, and streets) prior to any street changes for bike traffic. As mentioned at the Hollywood Hills West meeting on 3/24/15 - Europe has bike and pedestrian systems in place – however streets, subways and bus systems were already in place and in good repair - ours are not. Stripping for bikes will not change the car culture of Southern California. The associated funding this proposed project would require should be re-directed to the above mentioned repairs.*

Response R321-3

The commenter's concerns regarding localized infrastructure repairs in the area have been forwarded to the decision-makers. The MP 2035 is programmatic in nature and addresses change issues at a very broad level, without the benefit of detailed design for specific improvements. The focus of the plan is on changes to street function and capacity to accommodate and balance all modes. The specific issues of broken curbs, etc is site specific and not addressed in the EIR. See **Master Response 9** for the EIR analysis and conclusion regarding the funding and implementation of the MP 2035. See Response R200-1 related to impacts and existing infrastructure deficiencies to streets and sidewalks.

See **Master Response 22** on the EIR's scope/level of analysis at the programmatic level. The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R321-4

4. *The only streets that should be considered for bike traffic and the associated stripping are those designated as boulevards that are wide enough to safely allow bikes.*

Response R321-4

See **Master Response 13** for the EIR analysis and conclusion regarding bicycle safety and **Master Response 19** for the EIR analysis and conclusion regarding the implementation of the enhanced networks.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R322

Ron and Ronni Scardera
rrscar@pacbell.net

Comment R322-1

How can you possibly give yourselves an email address of "my.la" when you don't begin to, or even try to, act like my LA?

I have just learned there is something huge called Mobility 2035 Plan that discusses major changes in our city. No one I know has heard of this let alone seen it, much less had time to study it and comment on it.

My city would not make secret plans to alter (maybe even ruin) the livability of my neighborhoods and/or my ability to commute to and from work without publicizing every step of the way, without giving me the accessibility and time to digest it all, and without giving me a chance to comment or dialogue with it.

You have no right to call yourselves my LA without including me and all the rest of us who live in LA, with clear presentations, with time to study and understand it, with discussions and Q&A sessions, and with a little respect for the folks you claim to be representing. Please take a step back and a deep breath, and make a fresh start of this.

Response R322-1

My La is a planner with the City of Los Angeles responsible for receiving public comments and has the standard city email address (first name.last name@lacity.org): my.la@lacity.org.

The comments regarding the project are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R323

Rino Romano
rinovoice@gmail.com

Comment R323-1

- It would be fantastic if you guys extended your deadline, and presented the local housing associations (like ours in Hollywood Heights), with a simpler, easier to understand visual presentation -- and THEN asked for our input.

- We live in these neighborhoods - I myself have owned my home and been here for over 20 years, and have two neighbors on the cul de sac who've been here over 35 years each. We could really help you out with real world, ACCURATE feedback.

Response R323-1

See **Response R301-1** regarding the public review period.

Comment R323-2

I personally would LOVE to see more bike lanes and dedicated / protected bicycle lanes BUT, traffic is already incredibly challenging around here (I like at Hollywood and Highland). ..even our secret ways in and out of our neighborhood are being foiled and infiltrated by WAZE and the sheer explosion of new development in the environs as well as pass through daily traffic. It really is already stiffling and AT MAX.

Response R323-2

See **Master Response 1** regarding the traffic impact assessment methodology and vehicle-centric assumptions. See **Master Response 21** for details regarding the designation on Hollywood and Sunset Boulevards and Fairfax and Fountain Avenues.

Comment R323-3

*- ***Could you possible use the smaller streets such as FOUNTAIN for example or other more modest tributaries to create these bike lanes?? Please do not take a lane away from Hollywood Blvd (especially west of La Brea); and, despite protestations to the contrary, please PLEASE do maintain the current density maximums / development caps for this neighborhood. Its already out of hand and many of the new developments haven't even been populated with residents yet!*

Response R323-3

See **Master Response 21** for details regarding the designation on Hollywood and Sunset Boulevards and Fairfax and Fountain Avenues. MP 2035 does not address land use.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R323-4

- please do not confuse "THEORETICAL" traffic movement by city buses or even the subway for actual, realistic typical daily traffic movement and congestion. Even if we would occasionally choose to use a bike, or walk - living in the hills and working ALL OVER the city means that no matter how many choices are offered, we'll have to use our cars. ie. Please don't let developers make silly calculations based on mythical traffic and parking figures. Deal in reality, and realistic numbers please.

Response R323-4

See **Master Response 1** regarding traffic methodology.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R324

Sandro Reinhardt
dtown1000@yahoo.com

Comment R324-1

VEHICLE ENHANCED NETWORK (VEN) SUNSET BLVD, WEST OF LA BREA: OPPOSED

1. Prohibit and remove all parking or stopping on sunset blvd including valet and delivery trucks: OPPOSED.

i am requesting that Sunset blvd west of La Brea to the City of west Hollywood border be removed from the Mobility Plan 2035.

this would simply further stress already stressed local residential streets and add to the already difficult but necessary coexistence of residential and business stake holders

2. Limited and restricted turning movements: OPPOSED

3. Increased speed and Increase vehicle and truck volume: OPPOSED

this is not only unnecessary but exponentially increases the risk of a fatal accident on a Blvd that is already fraught with danger; indeed a taxi has already, under current restrictions, crashed into my restaurant, the only saving grace being that it was after business hours, therefore no one was hurt.

4. street widening: OPPOSED

5. prohibit filming during weekdays - night only: OPPOSED

BICYCLE ENHANCE NETWORK HOLLYWOOD BLVD - WEST OF LA BREA: OPPOSED

remove from mobility plan 2035

not only is there no room for this given the amount of traffic already moving through this area now, let alone in 2035, am keenly aware that the speed with which vehicles travel along this section of Hollywood Blvd, would result in a heightened risk to the safety of cyclists thinking they are safe in a bike lane.

Response R324-1

See **Master Response 21** for details regarding the designation on Hollywood Boulevard.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R324-2

FAIRFAX AVE - DESIGNATION CHANGE TO BLVD 1

do not increase speed on Fairfax. increasing speed in highly populated areas is an absurd notion at best. a 40 mile hour limit would mean that cars drive way faster as we know that young drivers push every limit.

Response R324-2

The MP 2035 is not proposing changes to the target speeds or speed limits on Fairfax Avenue. Fairfax is designated as a Moderate Transit Enhanced street as part of the TEN. The changes being proposed as part of the Enhanced Networks are intended to improve safety within the City.

Comment R324-3

i am all for change as long as it is constructive. i understand that the studies used in formulating the mobility plan of 2035 are seven years old as of today. given the exponential speed with which our society is progressing, it is disappointing that an outdated study is used to propose a a mobility plan to b used in 20 years.

Response R324-3

The traffic operations analysis for City roadways was updated to reflect Year 2014 conditions. The updated LOS did not result in any changes to the impacts related to traffic operations (**Impact 4.1-2**) or corresponding Mitigation Measures (**T1** and **T2**). Refer to Corrections and Additions for pages 4.1-14, 4.1-15, and 4.1-32 through 4.1-34.

The EIR was conducted in accordance with the City's CEQA threshold guide as outlined in the "Thresholds of Significance" section in each of the EIR technical chapters.

See **Master Response 13** regarding accident data and the EIR analysis and conclusion of bicycle safety. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R325

Shelley Mitchell
shellmit@gmail.com

Comment R325-1

Please extend the April 6 deadline and give our neighborhood leaders more time to give you meaningful input on these dramatic changes for the streets around our neighborhood.

Response R325-1

See **Response R301-1** regarding the public review period.

Letter No. R326

Sylvia J. Morales
sylviam@williamsworldwidetv.com

Comment R326-1

In regards to Mobility 2035, my husband and I are home owners in the affected area. We understand the city is planning to re-designate streets in and around Hollywood. This will affect the area we live in we are requesting you to extend the deadline for response.

If the city is genuinely interested in our feedback and partnership more time is needed for the communities comments. Please consider this request, I am sure many more will agree accordingly.

Response R326-1

See **Response R301-1** regarding the public review period.

Letter No. R327

Terry Tegnazian
10850 Wilshire Blvd., Suite 300
Los Angeles, CA 90024

Comment R327-1

Implementing Mobility Plan 2035 as addressed in the EIR with an extensive emphasis on incorporating bike lanes (especially in the form of Class IV/cycle tracks) on the major Westside thoroughfares is dangerous both for bikers and drivers, and will have a negative impact on business as well as personal travel—especially where current daily traffic counts are greater than 25,000 vehicles per day. Streets with more than 25,000 vehicles per day will gridlock if any of the existing travel lanes on the Westside are removed (Westwood Blvd. and Sepulveda Blvd. in particular). To be a “Great/Complete Street” vehicle traffic of all types must flow! For everyone’s safety, bike lanes should be on inner, less-traveled neighborhood streets, where speeds are 25mph or less to start with—rather than on major arteries!

Response R327-1

See **Master Response 1** regarding the traffic impact analysis methodology. The MP 2035 Enhanced Network treatments includes the NEN, which are focused on improving travel for bicyclists and pedestrians along neighborhood roadways. **Master Response 20** contains the EIR analysis and conclusion on the NEN. The MP 2035 EIR is a programmatic document that addresses impacts at an area level based on preliminary conceptual level information. As stated in **Chapter 1.0 Introduction** and **Section 4.1 Transportation, Parking and Safety** of the EIR, potential impacts on the vehicular circulation network are evaluated at a programmatic level using the City of Los Angeles’ Travel Demand Model, which includes assumptions about the expected level of land development between existing conditions and future horizon year (2035) conditions. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

See **Master Response 22** on the EIR’s scope/level of analysis at the programmatic level. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R327-2

1. *What effect will putting Class IV/cycle tracks on Westwood (Wilshire to Le Conte) have on bus traffic? Will the bike lane be between the curb and parking lane? Will the bike lane be between the parking lane and the traffic lane?*

Response R327-2

See **Response R210-3** for the EIR analysis and conclusion on bicycle facilities on Westwood.

Comment R327-3

3. *How will the proposals for Westwood Blvd. and other surrounding streets impact emergency vehicle access to Ronald Reagan UCLA Medical Center? How will such proposals impact fire department response time from the Fire Station on Veteran to its surrounding service area?*

Response R327-3

The EIR is a programmatic-level document. See **Master Response 22** discussing the scope/level of analysis of the EIR. As individual projects are considered, additional analysis and project-level impacts will be

addressed at that time under a separate undertaking. The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. See **Master Response 14** for the EIR analysis and conclusion on emergency access and response times. The EIR determined that a potentially significant and unavoidable impact would occur to emergency access and response times.

Comment R327-4

6. *Bike lanes or cycle tracks between the curb and a parking lane on Westwood Blvd. need to be very carefully evaluated; please analyze the following issues:*
 - a. *Bicyclists getting “doored” when vehicle passengers open a car door. Car side-view mirrors are not set up for passengers exiting vehicles.*

Response R327-4

See **Response R210-3** for the EIR analysis and conclusion on bicycle facilities on Westwood and bicycle safety. **Master Response 13** also provides the EIR analysis and conclusion on bicycle safety.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R327-5

- b. *Views of bicyclist in a curbside protected bike lane will be masked by parked cars—what are the potential dangers of this configuration? Will motorists be able to make right turns? If motorist will not be able to move close to the curb to queue for a right turn, will they then block traffic lanes?*
- c. *Will additional sets of bike-only signal timing need to be added to signaled intersections?*
- d. *What effect will additional bike sets of signal timing have at ATISAC-controlled signals? Can ATISAC-controlled corridors function when 1 or 2 signals contain an additional signal phase?*
- e. *Will Wilshire/Westwood traffic signal timing be affected by adding a bike lane along Westwood Blvd?*

Response R327-5

See **Response R210-5** regarding the proposed treatments on Westwood Boulevard and potential impacts to turning vehicles and traffic signal timings.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R327-6

10. *Bicycle accidents happen more frequently in sections of road that intersect with driveways and alleys, and where cyclists can build up speed on downhill segments. This is true even where bike lanes exist, as was brought to light in the “Proposed Westwood Blvd. Bikeways Remove Nothing Plan” where the plan showed that 1/3 of all bike accidents on Westwood Blvd. occurred along a segment that currently has striped bike lanes. Provide an analysis of and solutions for safety at driveways and alleys, and excessive bike speed on downhill segments.*

Response R327-6

See **Response R210-6** regarding bicyclists' safety.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R327-7

13. *Figure 3-4a shows BEN low-stress separated bikeways (class IV/cycle tracks) for Ohio Ave. (Barrington to Westwood)—will this require removing vehicle parking or travel lanes? If so, what impacts will this have?*

Response R327-7

The BEN designation on Ohio Avenue is expected to utilize the right-of-way available for the existing on-street bicycle lane and path on the north side of the roadway. Therefore, impacts to vehicular travel lanes and on-street parking are not anticipated. The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

Comment R327-8

17. *What impact will the Mobility Plan 2035 have on traffic-calming measures currently in place, such as speed bumps, bulb-outs and traffic circles? Will they be replaced or removed in order to accommodate proposed bike lanes, and if so, please specify along what portions of which streets that will occur.*

Response R327-8

Existing traffic calming measures are not proposed to be removed with the MP 2035. Rather, additional traffic calming measures are expected to be added to neighborhood streets as part of the NEN. **Master Response 20** contains additional information on the NEN.

Comment R327-9

18. *The implementation of bike lanes along Westwood Blvd. or Sepulveda Blvd. is targeted at connecting Expo Line riders (essentially east-west commuters) with jobs in Westwood. What impact will taking road width from Westwood Blvd. or Sepulveda Blvd. between Santa Monica Blvd. and National Blvd. have on the north-south vehicle commuters, e.g., traveling up from the South Bay or in from the San Fernando Valley and beyond?*

Response R327-9

See **Response R210-7** for a discussion on Westwood and Sepulveda Boulevards.

Comment R327-10

19. *Does the Mobility Plan 2035 contemplate limiting travel or parking lanes on the streets of West LA before adequate mass transit connecting the San Fernando Valley to the Westside and the South Bay to the Westside is built, or before adequate amounts of free (or inexpensive) parking is provided where people originate their public transit commute to West LA? If so, please provide specifics. How will this impact mobility throughout the Westside?*

Response R327-10

The phasing of the MP 2035 enhanced networks is not known at this time. See **Master Response 9** for the EIR analysis and conclusion regarding the funding and implementation of MP 2035. See **Master Response 19** for the EIR analysis and conclusion regarding the implementation of the enhanced networks.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R327-11

20. *What effect will putting bike lanes on Westwood Blvd. and Sepulveda Blvd. have on disabled persons that need to park along curbs in order to safely get in and out of their vehicles, or on parents who need to open car doors completely in order to get children in and out of car seats. Please analyze both for bike lanes placed between curb and parking, and for those placed between parking and traffic lanes.*

Response R327-11

See **Response R210-8** regarding the network treatments along Westwood Boulevard and Sepulveda Boulevard.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R327-12

Even in bicycle-friendly Portland, Oregon, bikers represent only about 6% of those who commute to work or school. What justification is there for negatively impacting the vast majority of the Los Angeles population in order to try to accommodate a miniscule minority, especially when this minority can be accommodated via safer alternate routes?

Response R327-12

Master Response 15 provides a discussion of the EIR analysis and conclusion on the legislative changes that have resulted in changes to the City's vision for transportation and mobility for current and future generations. The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. **Master Response 1** provides additional information on the traffic impact analysis conducted for the MP 2035.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R327-13

Evaluate the impacts for those who access Westwood Blvd. by car, carpool/vanpool, or bus.

Response R327-13

See **Master Response 1** regarding the traffic impact analysis methodology. The EIR is a programmatic-level document. Individual corridors were not analyzed as part of the proposed project. As individual projects are considered, additional data will be collected and project-level impacts will be addressed at that time under a separate undertaking. The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035.

See **Master Response 22** on the EIR's scope/level of analysis at the programmatic level. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R327-14

Evaluate the impacts on access by ambulances or other emergency vehicles to Ronald Reagan UCLA Medical Center.

Response R327-14

See **Response R327-3** regarding emergency vehicle access. The EIR determined that a potentially significant and unavoidable impact would occur to emergency access and response times. The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R327-15

28. *Evaluate the impacts of the Plan proposals on congestion along Wilshire Blvd. between Beverly Hills and Santa Monica, which is already set to worsen with the implementation of the Wilshire-BRT this month.*

Response R327-15

See **Response R210-10** regarding the Wilshire bus lanes.

Comment R327-16

29. *What are the impacts on businesses and nearby residents of turning Olympic Blvd. into a freeway by eliminating left turns at major intersections? A UCLA study says this will result in greater cut-through traffic on residential streets and longer commutes. What justification is there for imposing these impacts on businesses and residents in that area?*

Response R327-16

See **Response R210-11** regarding the treatments along Olympic Boulevard. The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R327-17

30. *What are impacts of removing parking from Westwood Blvd. or Sepulveda Blvd.—on the businesses along those streets, on surrounding residential streets where customers look for parking, on the environment from more cars circling for parking?*

Response R327-17

Master Response 10 describes the enhanced network treatments for Westwood Boulevard, which do not propose any parking removal along the corridor. For Sepulveda Boulevard, the TEN designation was analyzed assuming that a vehicle travel lane would be converted and not on-street parking. **Master Response 3** provides for the EIR analysis and conclusion regarding the potential loss of on-street parking and impacts to businesses.

The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R327-18

35. *Mobility Plan 2035's Transit Enhanced Network map doesn't address types of north/south mass transit. Why not? Transit on the I-405 (Pico to Mulholland) greatly affects local street traffic. This is a big piece of the puzzle!*

Response R327-18

See **Response R210-14** regarding north/south transit.

Comment R327-19

36. *Mobility Plan 2035 will increase vehicle miles traveled on freeway mainline segments, I-405 will experience an increase of 1.5 million VMT (18 percent) over existing conditions. per Table 4.1-30 (Vehicle Miles Traveled on Freeway Mainline Segments in the City of Los Angeles). What is the greenhouse gas increase of an additional 1.5 million VMT of I-405 motorists? How does this balance with what is saved by adding bike lanes?*

Response R327-19

See **Response R210-15** regarding VMT and GHG analysis contained in the EIR.

The commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R327-20

37. *How does Mobility Plan 2035 deal with increased incidents of "road rage" created by the increased traffic delays and obstacles imposed by loss of traffic lanes or parking?*

Response R327-20

See **Response R210-16** regarding road rage.

Comment R327-21

38. *How many bike accidents have there been in the city of Los Angeles each year over the past 20 years? What are the health impacts for bikers traveling on major thoroughfares breathing in car/bus/truck exhaust and outgassing of pavement, and being subjected close up to the noise of cars/buses/trucks and the seemingly endless street repairs?*

Response R327-21

See **Master Response 13** regarding accident data and for the EIR analysis and conclusion of bicycle safety. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. See **Master Response 4** for the EIR analysis and conclusion related to air quality impacts on bicyclists.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R327-22

39. *Why are bikes allowed to travel in bus-only lanes? What impact do bikers in bus-only lanes have on the speed of the buses in those lanes? What are the impacts on safety and health for bikers in the bus-only lanes?*

Response R327-22

State law allows bicyclists to ride on City streets whether or not the roadway is designated as a bicycle facility. See **Response R100-3** for additional information on these facilities. **Master Response 13** provides the EIR analysis and conclusion on bicycle safety.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R327-23

Creating and implementing a mobility plan for 2035 should be done with small steps. Every major thoroughfare does not need a bike lane if it comes at the expense of parking or traffic lanes—inner, less-traveled neighborhood streets are both safer for bikers, and will have less negative impact on the vast majority of the population who for one reason or another either cannot or prefer not to bike.

Westwood has been more concerned about implementation of bike lanes on major thoroughfares than other areas primarily because congestion is worse here than almost anywhere else in town—Westwood is among the most densely populated (if not the most densely populated) area of town with the proliferation of high-rise condo and apartment buildings along Wilshire Blvd., with UCLA, with the high-rise businesses buildings in Wilshire Corridor, and in serving as one of the principal routes between various major Westside work hubs (e.g., Beverly Hills, Century City) and the I-405 Freeway.

Response R327-23

The implementation of the Enhanced Networks (TEN, BEN, VEN, PED) would not automatically occur as a result of adoption of the MP 2035. Further design development and specific right-of-way treatments would be determined only after further study and discussion with the community and the City's leadership. See **Master Response 19** for the EIR analysis and conclusion on the implementation of the MP 2035. See also **Master Response 1** regarding the traffic impact analysis methodology.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R328

Theresa Laughlin
terry.laughlin@sbcglobal.net

Comment R328-1

Thank you for taking my comments.

Environment –maintain the quality of living that makes off limits any buildings that dwarf and destroys Residential Hollywood.

Transportation – I live in a 122 unit building and two bike and 3 people use the metro at Highland and Sunset. Distance is a problem and safety, too. This town had decent transportation but the car companies destroyed them. We are now a car town..let’s work on that ... more buildings more cars...more Greenhouse Gas.

Air Quality....looking for a good day to breathe is rare....

Water – We can’t supply our daily needs....why bring in more projects that will demand more water. With the limited water we have now the pipes are bursting all over Hollywood and the West Side (UCLA

Using a metaphorFix the roof before you paint the house.

Response R328-1

See **Master Response 1** regarding the traffic impact analysis methodology. See **Master Response 2** for the EIR analysis and conclusion regarding potential changes to quality of life and **Master Response 5** for the EIR analysis and conclusion regarding potential growth-inducing effects, and **Master Response 13** for the EIR analysis and conclusion regarding bicycle safety. Additional safety analysis is included in **Section 4.1 Transportation, Parking and Safety** of the EIR. Potential effects to air quality and greenhouse gases are analyzed in **Sections 4.3 Air Quality** and **4.4 Greenhouse Gases** of the EIR. The EIR determined that the proposed project would not result in significant impacts to safety, air quality or greenhouse gases.

See **Master Response 22** on the EIR’s scope/level of analysis at the programmatic level. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R329

Thomas Watson
thomasbwatson@gmail.com

Comment R329-1

1. *Congestion getting from the Hollywood Hills to Downtown and from Downtown to the Hollywood Hills needs to be addressed better. The commute is often now as long as an hour to go just 10 miles, wasting gas and creating pollution. Some ideas to alleviate this:*
 - A. *Add subway stops for the Hollywood Bowl and Dodger Stadium;*
 - B. *Create a toll zone for the Hollywood area when there's too much congestion*
 - C. *Add a FastTrak lane on the 101*

Response R329-1

See **Master Response 1** regarding the traffic impact analysis methodology. Potential effects to air quality and greenhouse gases are analyzed in **Sections 4.3 Air Quality** and **4.4 Greenhouse Gases** of the EIR. The EIR determined that the proposed project would not result in significant impacts to air quality or greenhouse gases. The commenter's ideas to alleviate congestion have been forwarded to the decision-makers. Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R329-2

2. *Congestion is causing too many people to commute via smaller roads in the Hollywood Hills such as Outpost, Multiview, Wrightwood and, most importantly, Mulholland Drive: A specific goal of the plan should be to keep commuters off these local, neighborhood roads especially Mulholland Drive (which already has lots of issues with tour buses) onto larger roads better equipped for the traffic.*

Response R329-2

See **Master Response 1** regarding the traffic impact analysis methodology. See **Master Response 18** for the EIR analysis and conclusion regarding potential traffic diversion and cut-through traffic.

See **Master Response 22** on the EIR's scope/level of analysis at the programmatic level. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R330

Tom Engfer
tomengfer@gmail.com

Comment R330-1

I am a resident of Hollywood. I was very recently notified LA has plans to reroute streets and such in my neighborhood.

I hereby request that an extension of the public comments period be made so as to ensure that everyone has time to read, reflect and create an informed opinion on this topic.

Response R330-1

The proposed MP 2035 would not result in the rerouting of any streets, but would reclassify some of them according to the City's new Complete Street Standards. See **Response R301-1** regarding the public review period.

Letter No. R331

Tom Williams

Comment R331-1

I hope the LADOT is involved in this as they were supposed to be in the original But the original needs MAJOR additions of LAX and POLA and their transportation issues...furthermore previous edition did not incorporate the SCAG's programs. I also hope it will have incorporated the SR-710...

Port and Airport now included and even SCAG but not the SR-710 or I-710 and a new section for "Goods Movements" rather than freight.

Looking for model...

OBTW remember that the SR-710 DEIR/DEIS will be circullated soon – ??in the next 3 weeks and will be comparing such along with the Calif.Frieght Master Plan.

Response R331-1

Interagency coordination with multiple agencies has occurred and will continue to occur throughout project development, including but not limited to, LADOT, Big Blue Bus, Caltrans, Culver City Transit, Foothill Transit, Metro, SCAQMD, and Metrolink. For modeling the transportation improvements, the City of Los Angeles is divided into 1,411 Transportation Analysis Zones, each with corresponding socioeconomic data obtained through coordination with SCAG and connections to the roadway and transit networks. See **Master Response 8** for the EIR analysis and conclusion related to goods movement and the implementation of plans related to Goods Movement. Major goods movement generators, such as the Port of Los Angeles and LAX, were included in the land use forecasts contained in the travel demand forecasting model applied to the MP 2035. See **Master Response 1** regarding traffic methodology and the model used.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R331-2

But only two small meetings for this new draft REIR "talked about" in PC Mtg .and then to final for the PC mtg. Have at least one REIR Public Evening meeting – workshop 6-8, then Q&A&Cmts 8-9pm PLEASE...

Response R331-2

See **Response R301-1** regarding the public review period.

Letter No. R332

Carolyn Thomas
carolyn.thomas@me.com

Comment R332-1

My neighbor, Eugene Gordon, shared that you are considering adding a bicycle lane to our narrow, sidewalk-less street. With this message, I join him in voicing my strong opposition to this unsafe plan. N. Beachwood Drive is so congested with traffic up to the Hollywood sign that it is unsafe for pedestrians, let alone cycling!

Many of the motorists are lost, unfamiliar with canyon streets and/or looking for parking where there is none. In their haste to depart, they often make unsafe and illegal U-turns which puts everyone at risk, most especially people on bicycles. Additionally, there is often little to no adherence to our stop signs.

Griffith Park has so many safe, beautiful and accessible bike paths, please remove the Enhanced Network route from Franklin Avenue through Vista Del Mar and ending at the terminus of Beachwood Drive from the 2035 Mobility Plan.

Response R332-1

Franklin Avenue is designated on the PEDs and not on the BEN. Pedestrian enhancements along would primarily consist of infrastructure improvements within the sidewalk and street right-of-way, as well as pedestrian signal timing infrastructure improvements. These enhancements would reduce risks to pedestrian safety. Typical pedestrian enhancements include way-finding, street trees, pedestrian-scaled street lighting, enhanced crosswalks at all legs of the intersection, automatic pedestrian signals, reduced crossing length (e.g., bulb-outs, median pedestrian refuges), wider sidewalks (greater than 15 feet where feasible), and specialty paving and seating areas where special maintenance funding exists. See **Master Response 20** for the EIR analysis and conclusion regarding the Neighborhood Enhanced Districts and **Master Response 21** regarding the designation of Beachwood Avenue.

The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R333

Christine Mills O'Brien
2811 Westshire Drive
Los Angeles, CA 90068

Comment R333-1

Thank you for the opportunity to discuss the Mobility Plan 2035 and to respond to its RDEIR. Below are my comments and concerns.

2.4 Neighborhood Enhanced Network, Primrose, Vista delMar, Beachwood Drives.

Please remove this area from the NEN. The Primrose, Vista DelMar, Beachwood NEN does not meet the primary goal of your plan: SAFETY.

These are narrow, winding, hillside streets, (some without sidewalks) and some with steep vertical grades. Visibility for vehicle, pedestrian and bike traffic is poor and would not support a safe bike user environment.

Evidence of this unsafe criteria is supported by your own Table 3-3 that discusses the street width. Primrose, Vista Del Mar and sections of Beachwood do not meet the most restrictive, limited definition of this table, with some street widths of less than 20 feet and limited sidewalks.

The recommendation to extend NEN from Beachwood Drive into a section of the Hollywoodland Gifted Park Land (a portion of Griffith Park donated to the city in 1944) raises environmental concerns relative to the conservation element, endangered species habitat and open space. As you know, this is area of the park is an Eco-sensitive area hosting mountain lion P-22, bobcats, raccoon, and significant bird species. It also has a unique micro climate.

Response R333-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the Neighborhood Enhanced Network.

See **Master Response 22** on the EIR's scope/level of analysis at the programmatic level. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R334

Donald Riedel
Skiierdon@aol.com

Comment R334-1

I am requesting that the Neighborhood Enhanced Network route from Franklin Ave. through Vista Del Mar and ending at the terminus of Beachwood Drive be removed from the 2035 Mobility Plan.

City Case No. ENV-2013-0911-EIR

File No. CPC-2013-0910-GPA-SP-CA-MS

State Clearinghouse No. 2013041012

My home is located at 3056 N. Beachwood Drive and I truly worry for the safety of everyone walking and riding up Beachwood Drive. I am always courteous to anyone that stops to ask directions to the sign and know they are guests in my neighborhood.

Adding another plan that encourages even more people riding on this street only presents an unsafe situation to an already overburdened street.

Please do the right thing for everyone's safety.

Response R334-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the NEN.

Letter No. R335

Edward Sheftel
EdSheftel@iheartmedia.com

Comment R335-1

My neighbor, Eugene Gordon, shared that you are considering adding a bicycle lane to our narrow, sidewalk-less street. With this message, I join him in voicing my strong opposition to this unsafe plan. N. Beachwood Drive is so congested with traffic up to the Hollywood sign that it is unsafe for cycling (and pedestrians.)

Many of the motorists are lost, unfamiliar with canyon streets and/or looking for parking where there is none. In their haste to depart, they often make unsafe and illegal U-turns which puts everyone at risk, most especially people on bicycles.

Griffith Park has so many safe, beautiful and accessible bike paths, please remove the Enhanced Network route from Franklin Avenue through Vista Del Mar and ending at the terminus of Beachwood Drive from the 2035 Mobility Plan.

Response R335-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the NEN.

Letter No. R336

Eugene Gordon
eugene@nostaticav.com

Comment R336-1

I would like to express my extreme opposition the the part of this plan whereby bicycle traffic will be routed onto our already congested section of Beachwood Canyon drive between Franklin Blvd and ending at the Sunset Stable at the north end of Beachwood.

The already unsafe conditions due to the amount of traffic and pedestrians we already have will be exacerbated by the addition of a bicycle lane and bicycle traffic and will make an already unsafe condition much worse.

I request that the Neighborhood Enhanced Network route from Franklin Ave. through Vista Del Mar and ending at the terminus of Beachwood Drive be removed from the 2035 Mobility Plan.

Response R336-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the NEN.

Letter No. R337

Hope Anderson
hopeanderson09@gmail.com

Comment R337-1

I am a resident of Beachwood Drive in Hollywoodland who has just heard of the proposed plan to put a bike lane on our street. This is a dangerous and poorly conceived plan that will put bicyclists, motorists and pedestrians at great risk. As anyone who has been to Hollywoodland can attest, Beachwood Drive is a narrow, winding two-lane road with no sidewalks beyond the three blocks north of the Village.

As it is, cars can barely negotiate the road, particularly if the drivers are unfamiliar with the neighborhood. Because there is no room for a bike lane, I can only imagine such a plan would encroach on the vehicular part of the road, making it even narrower. This is a disaster in the making.

With all of this in mind, I hope you will make the right choice by removing the Enhanced Network route from Franklin Avenue through Vista Del Mar and ending at the terminus of Beachwood Drive from the 2035 Mobility Plan.

Response R337-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the NEN.

Letter No. R338

Jonny MF Ernst
pnoboy@aol.com

Comment R338-1

Have you even been up Beachwood Drive recently to witness the constant harrowing situations we deal with every day between the hundreds of pedestrians and cars already? And now you want to promote bikes up here to boot? This is a horrible idea.

Take this off the 2035 Mobility plan please.

Response R338-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the NEN.

Letter No. R339

Jamie Rubin
jamierubin@gmail.com

Comment R339-1

Some of my neighbors shared that you are considering adding a bicycle lane to our narrow, sidewalk-less street. With this letter, I join my neighbors in voicing my strong opposition to this unsafe plan. N. Beachwood Drive is so congested with traffic up to the Hollywood sign that it is unsafe for cycling (and pedestrians.)

Many of the motorists are lost, unfamiliar with canyon streets and/or looking for parking where there is none. In their haste to depart, they often make unsafe and illegal U-turns which puts everyone at risk, most especially people on bicycles.

I have young children and I am already concerned about their safety when they get too close to the street on our driveway. Adding bicyclists to this already busy street would be a disaster.

Griffith Park has so many safe, beautiful and accessible bike paths, please remove the Enhanced Network route from Franklin Avenue through Vista Del Mar and ending at the terminus of Beachwood Drive from the 2035 Mobility Plan.

Response R339-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the NEN.

Letter No. R340

Joanne D'Antonio
jodantonio@aol.com

Comment R340-1

The Neighborhood Enhanced Network route from Franklin Ave. through Vista Del Mar and ending at the terminus of Beachwood Drive is unbelievably unsafe, too narrow for bicycles and should be removed from 2035 Mobility Plan. As former Safety Chair for Hollywoodland, I can assure this is very dangerous and someone on a bicycle will get killed. If you pass this, you will share in the responsibility when it happens.

These roads can barely handle cars, and some have no sidewalks . . . so bicycles and pedestrians will vie for the same inches. Truly a nightmare. Please, please reconsider. You may save a life.

Response R340-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the NEN.

Letter No. R341

Jonathan Gordin
jonathan.gordin@gmail.com

Comment R341-1

Some of my neighbors shared that you are considering adding a bicycle lane to our narrow, sidewalk-less street. With this letter, I join my neighbors in voicing my strong opposition to this unsafe plan. N. Beachwood Drive is so congested with traffic up to the Hollywood sign that it is unsafe for cycling (and pedestrians.)

Many of the motorists are lost, unfamiliar with canyon streets and/or looking for parking where there is none. In their haste to depart, they often make unsafe and illegal U-turns which puts everyone at risk, most especially people on bicycles.

I have young children and I am already concerned about their safety when they get too close to the street on our driveway. Adding bicyclists to this already busy street would be a disaster.

Griffith Park has so many safe, beautiful and accessible bike paths, please remove the Enhanced Network route from Franklin Avenue through Vista Del Mar and ending at the terminus of Beachwood Drive from the 2035 Mobility Plan.

Response R341-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the NEN.

Letter No. R342

Phil Friedman
kneedlersr@gmail.com

Comment R342-1

We are residents of Sunset and Spaulding Squares, two historic neighborhoods along Sunset Blvd between Hollywood Blvd and Fountain Avenue. We are extremely concerned about the negative impact that the changes proposed by the Mobility Plan and VEN would have on this primarily residential neighborhood flanking Sunset Blvd, west of La Brea to the West Hollywood border. We also have a small commercial zone containing local businesses in this area of Sunset Blvd as well--businesses which serve our residents. THIS IS A RESIDENTIAL NEIGHBORHOOD, NOT A FREEWAY. We need traffic calming, not additional dangerous speeds or widening.

Thank you for the opportunity to comment on the Mobility Plan 2035 Recirculated Draft EIR.

Reference City Case No. ENV-2013-0911-EIR - Related Case NO. CPC-2013-0910-GPA-SP-CA-MS - State Clearinghouse No. 2013041012

Please address the below concerns and provide detail on implementation, mitigations and impacts to Hollywood Blvd, Sunset Blvd, Fairfax Ave (west of La Brea) as part of the Mobility Plan 2035 - recirculated Draft EIR.

Thank you for your time reviewing the following comments as part of the Draft EIR for Mobility Plan 2035.

Response R342-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the NEN.

Letter No. R343

Jack and Michelle Conrad
Kcaj Benhadden
phatjaxx@gmail.com

Comment R343-1

What the hell are you guys smoking down there?

Beachwood Drive is already a calamity in waiting...somebody is going to get killed or seriously injured in the mess you guys have already created.

NO to a bicycle lane on our already overburdened street!

Response R343-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the NEN.

Letter No. R344

Laura Davis
laura@lauradavisproductions.com

Comment R344-1

My neighbor, Eugene Gordon, shared that you are considering adding a bicycle lane to our narrow, sidewalk-less street. With this message, I join him in voicing my strong opposition to this unsafe plan. N. Beachwood Drive is so congested with traffic up to the Hollywood sign that it is unsafe for cycling (and pedestrians.)

Many of the motorists are lost, unfamiliar with canyon streets and/or looking for parking where there is none. In their haste to depart, they often make unsafe and illegal U-turns which puts everyone at risk, most especially people on bicycles.

Griffith Park has so many safe, beautiful and accessible bike paths, please remove the Enhanced Network route from Franklin Avenue through Vista Del Mar and ending at the terminus of Beachwood Drive from the 2035 Mobility Plan.

Response R344-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the NEN.

Letter No. R345

Maureen Tabor
maurentabor@maurentabor.com

Comment R345-1

It is wrong to recommend that Beachwood be considered to be given a bike lane.

It would NOT be used by bicycling commuters. Bicycle lanes in the City are to encourage bicycle commuting.

A Beachwood bike lane would be used, instead, by enjoyment-seeking bicyclists for the 2 mile downhill coast.

With the past for years heightened traffic in the Hollywoodland area, encouraged by an ad hoc trail opening and by GPS services that drive thousands here every month, a bicycle lane would ONLY add to the chaos, confusion, and danger now here. Tourist hikers do not know how to drive or walk these streets and it would only be a matter of a time before there would be some horrific accident – and it would be a very short time before tempers would flare and the residents would have to endure more abuse of their neighborhood by the city encouragement of the use of this neighborhood as a recreation center.

PLEASE REMOVE this street as a candidate for a bicycle lane.

Response R345-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the NEN.

Letter No. R346

Paula Escott
paulasaker@me.com

Comment R346-1

I am asking that the Neighborhood Enhancement route from Franklin Ave to Primrose, Vista Del Mar ending on Beachwood Dr be removed from 2035 Mobility Plan..

It would seem that no one involved in the routing of this plan has actually biked it! IT IS ALL HILLS WITH BLIND CURVES. It is not even safe for walkers at this point!!! I have seen lost cars at the top of Primrose afraid to drive down it!!!

People that are unfamiliar with these hills have no idea how dangerous they are! We take our lives in our hands whenever we walk outside...there are Skate Borders, and Road Bikers, Bumper to bumper cars at times, all through these hills. Where is there room for residents trying to even get to our mailboxes...let alone Fire Trucks, Ambulances, Police cars.

If this goes forward it will be one more disaster for our residents.

Response R346-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the NEN.

Letter No. R347

Rio Phior
rio.phior@sagon-phior.com

Comment R347-1

I request that the Neighborhood Enhanced Network route from Franklin Ave. through Vista Del Mar and ending at the terminus of Beachwood Drive be removed from the 2035 Mobility Plan.

The roads in this area are not wide enough and I almost kill someone every time I drive this route, and that's without bikers on the road. As it is, current foot traffic, car and illegal overweight tour van traffic place residents and walkers in jeopardy since emergency services (fire & ambulance) cannot get through, especially on weekends. If Barham gets closed even more people from Lake Hollywood will be forced to use this route. This area is already too congested.

There are not enough rangers or police to manage the situation as it is. Either an infrastructure moron is proposing this, or if given the benefit of the doubt, it has to be someone with absolutely no working knowledge of the area.

You're setting up plans for a bowling alley. Only cars will be the bowling balls and bicyclists, the pins. This area needs to be removed immediately from the plan.

Response R347-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the NEN.

Letter No. R348

Scott Freeburg
scottfreeburg@gmail.com

Comment R348-1

As a resident of Beachwood dr I ask that the Neighborhood Enhanced Network route from Franklin Ave. through Vista Del Mar and ending at the terminus of Beachwood Drive be removed from the 2035 Mobility Plan.

The neighborhood is already facing record numbers of cars and pedestrians. It is frightening that this neighborhood as one of the few in the hills. Only adding to the problem are the number of blind curves. To add biking to the mix could be deadly. Please remove Beachwood from the plan.

I am troubled by the lack of transparency of this project and not including or educating the neighborhoods that will be impacted by this program.

Response R348-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the NEN.

Letter No. R349

Scott Thaler
scottthaler@mac.com

Comment R349-1

A Bike Lane on Upper N Beachwood??

Why not just Cobblestone the entire street?

Permits of the 1960s did not mandate off street parking at each home so we dont all have garage space. Homes have 2+ cars and why not? We own our homes!!

The Bike Lane takes one side of this street away from 50% of the home owners!

This is a marchiavellian plan at getting a walking-up tourist path which was overturned years ago!

Homes were \$18,000 dollars..they are now worths hundreds of thousands!

Residents were railroaded in to a PPD after decades of peaceful enjoyment in their own homes! Now WE pay fines for parking at our own homes!!!

Buy us all out! Turn this tiny residential neighborhood in to Disneyland-HollywoodLand Campus.

Make me an offer! I wont be the first to give up my land for the right offer..nor the last im sure!

But Nooo Bike Path!!!

Response R349-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the NEN.

Letter No. R350

Tony Clark
clarkarts@aol.com

Comment R350-1

In regards to your plans for 2035 I understand that this plan includes bringing a bicycle route up to the end of Beachwood Drive. At this time this neighborhood has been bombarded with hikers and tourists alike. The road is too narrow and there are few sidewalk. We have a gridlock here already. Fire trucks nor ambulances cannot navigate under current conditions.

Please divert this plan to larger streets with sidewalks. This plan will only make a dangerous situation worse.

Response R350-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the NEN.

Letter No. R351

Yvonne Westbrook
yvonne@westbrooktherapy.com

Comment R351-1

our neighbor, Laura Davis, stated you are considering adding a bicycle lane to N. Beachwood Dr.? If that is correct, we would like to say as a 41-year resident of 2815 N. Beachwood Dr (one block north of the village) that a bicycle lane will put bicyclists, pedestrians and driver's at great risk of physical injury. N. Beachwood Dr. does not have enough room to accommodate parked cars, pedestrians and traffic—we don't even have sidewalks north of Ledgewood Dr. I am joining my neighbors by voicing my very strong opposition to this unsafe plan.

Today is Easter weekend and we have had the usual motorists unfamiliar with canyon streets looking for parking where there is none, stopping and causing traffic problems, getting out of their cars and standing in the middle of the street, etc. When leaving, if a turn around is necessary, they often make unsafe and illegal U-turns which puts everyone at risk and bicyclists would be at even great risk...the amount of opening cars doors on the already congested street side should give you, at very least, a real pause. If you are at all concerned about public safety, you will realize that this is a very poorly thought out plan.

Griffith Park already has many safe, beautiful and accessible bike paths, please remove the Enhanced Network route from Franklin Avenue through Vista Del Mar and ending at the terminus of Beachwood Drive from the 2035 Mobility Plan.

Response R351-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the Neighborhood Enhanced Network.

Letter No. R352

Tim Armitage
timarmitage@gmail.com

Comment R352-1

On March 23rd, I attended a Q&A for the Mobility Plan 2035, attended by Hollywood Hills West Neighborhood Association and area residents. I agree with much of what was brought up at the meeting including:

- Residents should be given a more formal (less casual) presentation of the Mobility Plan (using visuals) to describe the plan and its potential impacts on circulation in the Hollywood Hills West area.*
- I would say the entire assembly agreed that the time frame between your current request for feedback and your desired ratification of the plan (June 2105) is far too narrow.*
- There was quite bit of confusion around classification of roads "as is" in their current state and reclassification that would alter current zoning and land use permissions.*
- There was enormous concern and anxiety that the Mobility Plan is being used as a shill, smoothing the way for future construction of high-density, high-rise residential and commercial developments in the area.*
- There is a general lack of trust around whether the City is being transparent about the relationship between the Hollywood Horizon EIR, the Mobility Plan 2035 and private developers who are applying for zoning reclassification in our area from Residential (R3-1) to Commercial (C4-2).*
- In direct response to the Mobility Plan 2035, many felt that the plan works in broad strokes and does not take into consideration nuances unique to our neighborhood including:*

The current F rating of the intersections at: La Brea Ave/Hollywood Blvd and La Brea Ave/Franklin Ave

Frequent street closures due to Hollywood Blvd events

Traffic congestion caused by the Hollywood Bowl

Rush hour congestion at: La Brea Ave/Hollywood Blvd, La Brea Ave/Franklin Ave, Franklin Ave/Highland Ave

The vast difference between traveling north/south and east/west in our neighborhoods. East/west travel is far more smooth/calm/rapid. North/south travel far slower, stop/go and curvy/hilly/dangerous.

- There is enormous anxiety over the impact to smooth/calm/efficient travel if a bicycle lane were added to Hollywood Blvd (west of La Brea).*

Response R352-1

See **Master Response 6** for the EIR analysis and conclusion regarding public outreach and **Master Response 5** for the EIR analysis and conclusion regarding growth-inducing effects. See **Response R333-1** and **Master Responses 20** and **21** regarding the designations within the Hollywood area. See **Master Response 1** regarding the traffic impact analysis methodology. The commenter's confusion regarding classification of roads is not clear. The objective of the MP 2035 is to optimize use of city streets. Nothing in the MP 2035 would alter current zoning and land use controls.

The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R353

Janet Carper
janet.carper12@gmail.com

Comment R353-1

I met you at the open house for the Mobility Plan 2035 Recirculated Draft EIR. I have checked with many people and no one had heard of this plan or the comment period. In any case, it is alarming that the data for the study seems to be from about 7 years ago. Making plans based on outdated data seems to be a problem with the City of LA (e.g. the Hollywood Community Plan which was thrown out in court) and it is disconcerting and exasperating for a resident, like me. As I mentioned at the Open House, the theories put forth need to be carefully tested with the reality of particular areas of Los Angeles.

Response R353-1

See **Master Response 6** for the EIR analysis and conclusion regarding public participation and **Master Responses 20** and **21** regarding the designations within the Hollywood area. See **Master Response 1** regarding the traffic impact analysis methodology including the updated data.

Finally, the commenter provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Comment R353-2

In Hollywood, for instance, street parking is already a problem for residents if their apartments don't offer them garage parking. With all the--egregiously inappropriate--densification being foisted onto Hollywood, the notion of reducing parking in order to force people to use public transportation is an erroneous theory. People who will be living in new buildings will still own a car even if they happen to be willing--though unlikely--to walk through the crowd of Hollywood Blvd. tourists and street characters to get to the metro, which has a limited number of routes. These new residents will also be having guests over for dinner, etc., and people of that economic level are unlikely to take the subway or bus.

Response R353-2

See **Response R333-1** and **Master Responses 20** and **21** regarding the designations within the Hollywood area.

Comment R353-3

As for everything else, I agree with a letter sent by Save Residential Hollywood, as follows:

It is also alarming that the studies don't take into account the high number of times when Hollywood Boulevard is closed and/or when the Hollywood Bowl is holding events at which time traffic is gridlocked and public transportation is rerouted or is inaccessible.

HOLLYWOOD BLVD -WEST OF LA BREA - PROPOSED BICYCLE ENHANCED NETWORK (BEN) WE ARE OPPOSED

The proposed BEN should be removed from the Mobility Plan 2035 for Hollywood Blvd west of La Brea Ave (La Brea to Fairfax).

This BEN segment would convert one of only two existing lanes on Hollywood Blvd to a bike lane/cycle-track and remove residential parking. Hollywood Blvd west of La Brea (between La Brea and Laurel Canyon) is residential only with two (2) vehicle travel lanes during AM and PM peak hours and only one (1) vehicle travel lane during non peak hours.

Adding a bike lane-cycletrack, by converting one vehicle/parking lane would have negative impacts on the area including the following:

- *Further impede already heavy traffic flow on residential Hollywood Blvd.*
- *Cause increased cut-through traffic, negatively impacting the residential neighborhoods North and South of Hollywood Blvd, especially during A.M. and P.M. peak hours.*
- *Eliminate needed residential parking on Hollywood Blvd, west of La Brea*
- *Reduce vehicle travel to only one lane in each direction, causing extreme back-up in the residential neighborhood from hillside and commuter traffic.*
- *Residential Hollywood Blvd is further burdened by frequent street and lane closures on Hollywood Blvd east of La Brea for events, movie premieres, Academy Awards, L.A. Marathon, Christmas Parade, Festivals, Half Marathons, in addition to the Hollywood Bowl season. Events, street and sidewalk closures should be addressed and included as part of the Draft EIR.*
- *Converting the curb lane to protected bike lane-cycletracks on Hollywood Blvd through the residential neighborhood would obstruct safe access for bikes and residents trying to get in and out of their homes. Residential buildings only have ingress and egress to their homes on Hollywood Blvd.*
- *Placement of a bike lane on Hollywood Blvd would obstruct and or prevent all trash receptacles and garbage dumpsters from being put out and collected.*
- *Bikes on residential Hollywood Blvd would have to merge into vehicle travel lane during times when trash bins and dumpsters are set out waiting to be collected by garbage trucks.*
- *Delivery trucks, mail trucks and maintenance service vehicles services the homes on Hollywood Boulevard and would lose access as well as create increased hazards.*
- *Obstructing residential access would create unsafe conditions for vehicles and bikes and a potential liability for the City of Los Angeles.*
- *More traffic gridlock and the addition of a bike lane on residential Hollywood Blvd would further reduce emergency response time to the abutting hillsides, a High Fire Hazard Danger Zone.*

***STREET WIDENINGS OF SUNSET, HOLLYWOOD BOULEVARD, FOUNTAIN AND ANY OTHERS:
OPPOSED***

Sunset Boulevard, Hollywood Boulevard, Fountain Avenue and other residential streets in this area cannot support further widening. Current street width should be maintained. The widening of any streets west of La Brea would further reduce already narrow sidewalks. This would create unsafe conditions for all pedestrians. No street widening west of La Brea to the City of West Hollywood boundary. Widening streets at the expense of safe sidewalks is putting the needs of commuters at the expense of the residents of this area.

FAIRFAX AVENUE/HOLLYWOOD AND HOLLYWOOD BOULEVARD/LA BREA are designated as pedestrian enhanced networks. There is no explanation of what this means but both of these intersections, especially Hollywood/La Brea are already overly congested. Hollywood/La Brea is gridlocked often during both the A.M. and P.M. peak hours and is the end point for traffic when Hollywood Boulevard is closed, as it frequently is.

FAIRFAX AVE - PROPOSED STREET DESIGNATION CHANGE TO: BOULEVARD L

Do not increase speed on Fairfax Ave north of Fountain Ave to target speed of 40 miles per hour. Maintain or reduce speed on Fairfax Ave. Fairfax Avenue north of Fountain to Hollywood Boulevard is residential and a portion is a part of the Sunset Square HPOZ.

SUNSET BLVD -WEST OF LA BREA PROPOSED VEHICLE ENHANCED NETWORK (VEN)

Sunset Blvd west of La Brea to the City of West Hollywood boundary should be removed from the proposed VEN - Mobility Plan 2035

The proposed treatments for Vehicle Enhanced Network (VEN) are as follows: Remove parking from Sunset Blvd - Increase vehicle speed - Limit turning movements to residential streets - Prohibit utility work, Construction and Filming during weekdays. Work to be performed at night.

Sunset Blvd west of La Brea is primarily residential anchored by two historic single family neighborhoods Spaulding Square HPOZ and Sunset Square HPOZ and multi family neighborhoods.

The neighborhoods, north and south of Sunset Blvd are unique residential with many families with small children and seniors who walk on and cross Sunset Blvd regularly. Gardner Elementary School is located on Gardner Street at Hawthorne just north of Sunset.

Residential use starts just fifty to one hundred feet from Sunset with minimal to no buffer between residential and commercial uses on Sunset Blvd west of La Brea to the City of West Hollywood border.

The narrow commercial strip that lines Sunset Blvd west of La Brea is older and of a historic character consisting mostly low rise one and two story structures with lower intensity earlier closing uses. The majority of the commercial buildings on Sunset Boulevard have little to no on-site parking for their employees and patrons.

Local residential streets cannot support or accommodate additional parking for employees, patrons, delivery trucks, valet parking set up if parking is eliminated on Sunset Boulevard.

The proposed VEN for Sunset Blvd west of La Brea will encourage more traffic and increased speed greatly diminishing the quality of life for the neighborhood as well as impacting the small commercial establishments currently on Sunset Boulevard whose patrons will have no parking.

Parking: Do not remove parking form Sunset Blvd west of La Brea.

- Removing parking from Sunset Blvd, west of La Brea would put our local businesses out of business. The majority of the commercial structures along Sunset are, older "grandfathered" historic structures. Many are local mom & pop businesses that share often little to zero on-site parking for their employees and patrons.*
- The removal of parking and as well as "stopping" for our small businesses on Sunset Blvd would cause great harm to the small local businesses and effectively eliminate businesses from taking delivery of goods and services. Deliveries should continue to take place on Sunset Blvd west of La Brea and Not on residential streets.*

Residential streets along Sunset Blvd in no way can accommodate more employee and patron parking or valet set up, drop off and pick up or commercial delivery trucks on the narrow street and in front of private residence.

- Prohibiting parking, valet and delivery trucks from Sunset Blvd would force all these uses to stage in front of residential homes, on residential streets 24/7. This intrusion would not be protecting neighborhoods or conform to the elements of the General Plan or either version of the Hollywood Community Plan.*

- *The residential streets off Sunset Blvd currently are too narrow to accommodate garbage trucks and pass through vehicles at the same time. If the garbage truck is on the street, vehicles must back out off the street, or wait a long while to pass through.*

- *Removing vehicle parking and stopping from Sunset Blvd west of La Brea would force valet set-up, drop off-pick up on to the residential streets and in front of private homes and residence. Valet operations on residential streets in front of residential properties would adversely impact the quality of life by creating traffic hazards, loss of peaceful enjoyment, blocking private driveways, create hazardous traffic conditions and unbearable late night noise and headlight glare in the neighborhoods.*

Limited and Restricted Turning Movements: The Draft EIR fails to provide detail and or any specific information as to exact streets and intersections where, how and when turns turns would be restricted for the proposed VEN designation on Sunset Blvd west of La Brea.

Increased Speed Proposed-Sunset Blvd: Do not increase speed on Sunset Blvd west of La Brea.

- *The proposed VEN for Sunset Blvd west of La Brea will result in increased traffic and congestion and adversely impact the quality of life in surrounding neighborhoods that are residential.*

- *Sidewalks along Sunset Boulevard are narrow and don't have any buffer between vehicles other than the parked cars. Children are crossing Sunset at Gardner Street going to school.*

- *Any increased speed on Sunset increase dangerous conditions for all pedestrians.*

- *Increased vehicles speed will increase noise on and from Sunset Blvd. Residential uses are 50 feet off Sunset and will be negatively impacted by increased noise.*

- *Current posted speed on Sunset Blvd is 35 mph and should not be increased. If any changes are contemplated to improve the quality of life in the neighborhood, the speed should be decreased.*

Response R353-3

See **Response R333-1** and **Master Responses 20** and **21** regarding the designations within the Hollywood area. See **Master Response 18** discussing EIR analysis related to cut through traffic, transportation and safety and parking related issues.

See **Master Response 22** on the EIR's scope/level of analysis at the programmatic level. The comments are noted and will be provided to the decision-maker prior to project approval for its review and consideration. The commenter provides no specific comment on the environmental conclusions in the RDEIR and provides no substantial evidence supporting the need for different analysis or conclusions from those in the RDEIR. Therefore, there is no basis for additional analysis and no further response is required. (CEQA Guidelines, Sections 15088; 15204(e).)

Letter No. R354

Peggy Webber McClory
cartradiola@yahoo.com

Comment R354-1

I was notified by Neighborhood members to contribute my attitude about bicycle paths in our business area. I have almost never seen anyone riding a bicycle in our business area of Hollywood and Vine and Franklin. It is congested already and I do not think bicycles need the extra space in an area where there is no actual or real need for attention. This is my honest evaluation even though I approve of Bike riding in areas where there is not such heavy traffic.

Thank you, I have lived in the Hollywood area thirty one years this time, and when I was younger, I lived in Hollywood for ten years while being employed at NBC, CBS, ABC and Mutual networks.

Response R354-1

See **Response R333-1** and **Master Responses 20** and **21** regarding the designations within the Hollywood area and **Master Response 13** for the EIR analysis and conclusion regarding bicycle safety.

3.0 CORRECTIONS AND ADDITIONS

As required by Section 15088 of the CEQA Guidelines, this chapter provides corrections or clarifications to the Recirculated Draft Environmental Impact Report (RDEIR). The corrections and additions are provided below in underline or ~~strikeout~~ text as needed to indicate an addition or deletion, respectively. None of the corrections and additions constitutes significant new information or substantial project changes as defined by Section 15088.5 of the California Environmental Quality Act (CEQA) Guidelines.

INTRODUCTION

Page 1-1, the paragraph under the first set of bullets is revised as follows:

Assuming that all bicycle lanes would require the conversion of a vehicular lane of travel in each direction is a worst-case assumption for vehicle impacts, and it is anticipated that some bicycle lanes can be accomplished by removing only one vehicle lane from the roadway or without removing any travel lanes. However, without specific roadway designs, it is not possible to determine at the neighborhood ~~city~~ scale where bicycle lanes can be accommodated and, therefore, in the interests of providing a conservative analysis, all bicycle lanes are assumed to require the conversion of a vehicle travel lane. In addition, the EIR revised the freeway lane capacity from 2,200 vehicles per lane per hour to 2,000 vehicles per lane per hour to provide a more conservative analysis of impacts to freeways.

Page 1-2, last bullet (3rd), 6th sentence, is revised as follows:

~~Remaining portions of Westwood Boulevard would retain their existing bicycle lanes. There is an existing bicycle lane on Westwood Boulevard that extends from Santa Monica Boulevard to Wellworth Avenue. The segment along Westwood Boulevard from Wellworth to LeConte Avenues is on the BEN, but would not require the removal of a travel lane.~~

SUMMARY

Page 2-2, delete second bullet and four sub-bullets and add a new bullet:

- ~~A **Map Atlas** that identifies:~~
 - ~~Enhanced Complete Street System that includes selected roadways for pedestrian, bicycle, transit, or vehicle enhancements and proposed and programmed projects from a variety of sources~~
 - ~~Generalized Circulation System (Highways and Freeways Map)~~
 - ~~Scenic Highways~~
 - ~~Goods Movement System~~
 - Citywide General Plan Circulation System Maps (Highways and Freeways map) including information about Scenic Highways.

Page 2-2, the following sentence is added to the third bullet on the page:

- An **Action Plan** – that identifies programs that support implementation of the Plan’s goals and policies and aids the City in achieving its objectives. The Action Plan includes the Network Concept Maps that identify potential roadways for pedestrian, bicycle, transit, or vehicle enhancements as well as depicts existing freight movement facilities. The Networks take into consideration proposed and programmed projects from a variety of sources.

Page 2-2, the following is added to the last bullet on the page:

A draft of the first Five-Year Implementation Strategy is currently available, it identifies suggested milestones to achieve over the next five years (e.g. number of bicycle corrals and number of miles of NEN roadways to be improved) however, the priority and timing of individual projects is not identified and it provides no additional detail regarding design of individual projects, and therefore additional analysis beyond that included in this FEIR is not feasible at this time. As individual projects move forward and design details become available, they will receive project-specific environmental review as appropriate.

PROJECT DESCRIPTION

Throughout this section and elsewhere in the EIR – references to S-470 are revised to be to S-470-1.

Page 3-1, modify the third bullet as follows:

- Plan for a Healthy Los Angeles (~~adoption pending spring~~ adopted 2015)

Page 3-4, the beginning of the last paragraph is revised as follows:

The arterials included in the MP 2035 as part of the Pedestrian Enhanced Districts (PEDs), BEN, NEN, TEN, and VEN are located within the jurisdictional limits of the City of Los Angeles (**Figure 3-1** illustrates the locations of streets designated as Arterials, **Figure 3-2** through **Figure 3-6** at the end of this chapter, depict the ~~study~~ project area and proposed enhanced corridors). ...

Page 3-6, the second bullet is revised as follows:

- ~~A Map Atlas that identifies:~~
 - ~~Enhanced Complete Street System that includes selected roadways for pedestrian, bicycle, transit, or vehicle enhancements and proposed and programmed projects from a variety of sources~~
 - ~~Generalized Circulation System (Highways and Freeways Map)~~
 - ~~Scenic Highways~~
 - ~~Goods Movement System~~
- Citywide General Plan Circulation System

Page 3-6, the third bullet is revised as follows:

- An **Action Plan** – that identifies programs that support implementation of the Plan’s goals and policies and aids the City in achieving its objectives (implementation of all or a portion of the Action Plan is incumbent upon staffing capacity and future funding). The Action Plan includes the Network Concept Maps that identify potential roadways for pedestrian, bicycle, transit, or vehicle enhancements as well as depicts existing freight movement facilities. The Networks take into consideration proposed and programmed projects from a variety of sources.
 - Enhanced Network Concept
 - Goods Movement

Page 3-6, the following is added to the last bullet on the page:

A draft of the first Five-Year Implementation Strategy is currently available, it identifies suggested milestones to achieve over the next five years (e.g. number of bicycle corrals and number of miles of NEN roadways to be improved) however, the priority and timing of individual projects is not identified and it provides no additional detail regarding design of individual projects, and therefore additional analysis beyond that included in this Final EIR is not feasible at this time. As individual

projects move forward and design details become available, they will receive project-specific environmental review as appropriate.

Page 3-6, under the heading “Mobility Plan 2035 Components,” the sub headings and associated text are being reorganized as follows:

Mobility Plan 2035 Components

- Policies
- Citywide General Plan Circulation System
- Action Plan
 - Enhanced Network Concept
 - Goods Movement

The associated text with the headings remains the same unless otherwise corrected below

Page 3-6, the second to last heading and last heading are revised as follows

MAP-ATLAS CITYWIDE GENERAL PLAN CIRCULATION SYSTEM

Enhanced Complete Street System Network Concept Maps

Move this new heading (Network Concept Maps) and the following text through the middle of page 3-12 (including Table 3-2 which is renumbered to be consecutive, including in the Table of Contents) to the bottom of page 3-15 (Network Concept maps is now a subheading of the Action Plan.

Page 3-6, last paragraph (to be moved as indicated above), the following sentence is added to the beginning of the paragraph:

To guide the City in making future decisions about modal enhancements the MP 2035 Action Plan provides a conceptual series of networks. All city streets must serve the needs of all roadway users by accommodating pedestrians, bicyclists, motorists, movers of commercial goods, and users of public transportation, consistent with the Complete....

Page 3-7 (to be moved as indicated above), the first full paragraph is revised as follows:

The development of a citywide Enhanced ~~Complete Street System~~ Network Concept outlines modal enhancements for particular major streets in mode-specific enhanced networks/districts that together create a system of complete streets that will improve the overall multimodal transportation system. The Enhanced Network Concept ~~Complete Street System~~ comprises four enhanced networks, one each to support pedestrian (neighborhoods), bicycle, transit, and vehicle travel, as well as PEDs. The Backbone Network from the 2010 Bicycle Plan has also been retained but is simply referred to as the Bicycle Lane Network.

Page 3-7 (to be moved as indicated above), the second full paragraph is revised as follows:

While the MP 2035 identifies ~~suggested~~ streets to comprise the networks and/or districts it is important to note that, at the time that funding becomes available to implement network or district improvements within a selected corridor, that land use and/or transportation investments may have altered the landscape in such a way to warrant the consideration of an alternative street than is initially identified in the MP 2035. Should an alternative street be determined to better serve the needs of the individual network (than the street originally identified), it is expected that the alternative would serve users similar to the originally selected street. Changes to the network would not require a General Plan Amendment. The build-out strategy for the networks and districts described below is intended to provide for a flexible and iterative process based upon prioritization criteria, funding, roadway capacity, community support and political interest. It is reasonably expected that future alterations to the enhanced networks would

operate similarly as the enhanced networks for purposes of environmental review and analysis and would have similar impacts at the programmatic City-wide level.

Page 3-8 (to be moved as indicated above), second to last paragraph, the following sentence is added to the end of the paragraph as follows:

...Culver City Bus and Foothill Transit. These transit service operators are responsible for establishing service levels and hours of operation.

Page 3-12, delete the heading, “**Generalized Circulation System**”

Pages 3-12 to 3-14, move the text starting under the old heading “Generalized Circulation Systems” and tables (3-3 and 3-4, to become Tables 3-1 and 3-2; Table of Contents is similarly revised) under the new heading under the new heading “**CITYWIDE GENERAL PLAN CIRCULATION SYSTEM**” on page 3-6.

Page 3-13, Table 3-3 (now **Table 3-1**) is updated to reflect the correct dimension for Hillside limited, as follows:

TABLE 3-1: STREET DESIGNATIONS AND STANDARD ROADWAY DIMENSIONS				
Previous Designation	Previous Designated Dimensions	Example of Previous Built Dimensions	New Designation(s)	New Designated Dimensions right-of-way/ roadway widths, feet
	right-of-way/roadway widths, feet			
Major Highway Class I	126/102	126/102	Boulevard I	136/100
		110/80	Boulevard II	110/80
Major Highway Class II	104/80	104/80	Boulevard II	110/80
		100/70	Avenue I	100/70
		86/56	Avenue II	86/56
Secondary Highway	90/70	90/70	Avenue I	100/70
		86/56	Avenue II	86/56
		72/46	Avenue III	72/46
		66/40	Collector Street	66/40
Collector Street	64/44	64/44	Collector Street	66/40
Industrial Collector Street	64/48	64/48	Industrial Collector Street	68/48
Local Street	60/36	60/36	Local Standard	60/36
		50/30	Local Limited	50/30
Industrial Local	60/44	60/44	Industrial Local	64/44
Standard Walkway	10	10	Pedestrian Walkway	10–25
	(New Designation)		Shared Street	30' / 10'
	(New Designation)		Access Roadway	20 right-of-way
Service Road	20	Various	One-Way Service Road – Adjoining Arterial Streets	28–35/12 or 18
			Bi-Directional Service Road – Adjoining Arterial Streets	33–41/20 or 28
Hillside Collector	50/40	50/40	Hillside Collector	50/40
Hillside Local	44/36	44/36	Hillside Local	44/36
Hillside Limited	36/ 26 28	36/ 26 28	Hillside Standard	36/26
None	26/20	26/20	Hillside Limited	26/20

SOURCE: City of Los Angeles, 2015.

Page 3-15, the heading “Goods Movement” and the two paragraphs under the subheading are moved to become the second main heading under Action Plan (before “SUPPORTING DOCUMENTS.”)

Page 3-16, before the sub-heading “Arterials Streets” the following new paragraphs are added:

Staff have initiated technical corrections to LAMC Section 12.37 to clarify the process whereby city staff (Bureau of Engineering and the Department of City Planning) determine the extent, if any, of a street dedication and to provide a clear process for a project applicant to request a waiver from the required dedication. These corrections were determined to be necessary in order to provide staff and project applicants with a clear process for implementing the City’s revised S-470-1 Street Standard Plans and for requesting a waiver from the dedication.

The development of the revised S-470-1 and the re-assignment of every arterial in the City to one of the new arterial designations is intended to reduce the extent of future street dedications. The technical corrections to 12.37 provide City staff with clear instruction on how the dedication is to be calculated thus ensuring that the overall intent to minimize street dedications is maintained. Under the new S-470-1, dedications may be required to provide a wider sidewalk but in most cases the overall roadway width (curb to curb) will not be expanded.

Today, the process for requesting a waiver from the street dedication is unclear. The current language in 12.37 directs an applicant to Guidelines established by the Street Standard Committee. Most applicants do not realize that these Guidelines outline the waiver process and include a waiver request form. Because of this vagueness applicants often turn to their councilperson for assistance in obtaining a waiver. To provide greater clarity, information about the waiver process is being embedded directly in 12.37 so that an applicant does not need to find the Guidelines and/or obtain a motion through Council to waive their dedication.

Page 3-18, the following is added to the end of the paragraph under the subheading “Five year Implementation Strategy:”

A draft of the first Five-Year Implementation Strategy is currently available, it identifies suggested milestones to achieve over the next five years (e.g. number of bicycle corrals and number of miles of NEN roadways to be improved) however, the priority and timing of individual projects is not identified and it provides no additional detail regarding design of individual projects, and therefore additional analysis beyond that included in this FEIR is not feasible at this time. As individual projects move forward and design details become available, they will receive project-specific environmental review as appropriate.

Page 3-19, 5th bullet is revised as follows:

- Revise the Street Dedication Guidelines/Checklist developed in response to LAMC 12.37 A.5 to reflect the revised S-470 Complete Street Standards. Revisions to LAMC Section 12.37 to clarify the procedures for calculating the extent of a required street dedication and to establish a process for projects to request a waiver from a required dedication.

Figures 3-1, 3-3, 3-4A, 3-4B and 3-6 are replaced (see end of this section).

ENVIRONMENTAL IMPACTS

- Page 4-1, the third bullet is revised as follows:
 - **Thresholds of Significance** - Lists the thresholds used in identifying significant impacts as identified in Appendix G of the State California Environmental Quality Act (CEQA) Guidelines and the thresholds adopted by the City of Los Angeles.

TRANSPORTATION, PARKING, AND SAFETY

Page 4.1-6, the beginning of the first paragraph under the subheadings “Existing Setting” and “Overview” is revised as follows:

The study area is defined by the boundaries of the City of Los Angeles, illustrated in **Figure 4.1-1** by the potential impacts of MP 2035 to transportation, parking and safety. The EIR studied impacts to areas within the City and neighboring jurisdictions and freeways that serve the region. The City of Los Angeles General Plan contains definitions, goals and objectives, and regulatory requirements for a variety of roadway classifications that make up the City’s roadway system. The City has five general categories of roadway classifications, including Major Highway Class I, Major Highway Class II, Secondary Highway, Collector Street, and Local Street. These roadway classifications consider the level of traffic volume, roadway capacity, and its functions:

Page 4.1-8, the following is added to the end of the first paragraph:

.... Local Streets comprise approximately 60 percent of the City’s street system, while Major Highways, Secondary Highways, and Collector Streets, collectively known as “select streets,” comprise approximately 40 percent of the local roadway network.¹ The City’s on-line planning tools, ZIMAS and Navigate LA provide roadway details, also the Travel Demand Forecasting Model includes approximate roadway geometries (number of lanes). Figure 3-1 shows the Highways and Freeways and generalized circulation system in the city of Los Angeles.

Pages 4.1-15 and 4.1-16. The traffic operations analysis for City roadways was updated to reflect Year 2014 conditions. (Existing Conditions for mode split/trips by mode, vehicle trips, CMP freeway peak hour conditions, VMT, VHT and transit boardings were not updated because such updates would not result in changes to the significance of impacts for the following reasons: 1) the updated Year 2014 roadway operations analysis resulted in minor V/C changes and therefore VMT, VHT and CMP results would be expected to be similarly minor and would not affect EIR conclusions; 2) transit data boardings are already for 2013 the year the NOP was issued, and 3) the mode split data reflects the most recent readily available data at a Citywide/regional scale.) Starting at the bottom of page 4.1-15, the end of the last paragraph, and continuing through Table 4.1-12, the existing conditions level of service (LOS) results for roadway operating conditions are updated to reflect Year 2014 conditions as follows:

In the AM peak, ~~over 20~~ approximately 22 percent of Central APC segments operate at LOS E or F, increasing to ~~30~~ 33 percent in the PM peak. Citywide, ~~nearly 13~~ 13.5 percent of street segments operate at LOS E or F in the AM peak, rising to ~~nearly 18~~ 19 percent in the PM peak.

TABLE 4.1-11: SUMMARY OF EXISTING AM PEAK PERIOD ROADWAY SEGMENTS OPERATING CONDITIONS					
Area Planning Commission	Percent of Segments Operating at: /a/				Weighted Average V/C Ratio (all segments) /a/
	LOS D or Better	LOS E	LOS F	Unsatisfactory LOS (E or F)	
1. North Valley	95.70% <u>95.5%</u>	4.60% <u>1.6%</u>	2.60% <u>2.8%</u>	4.30% <u>4.5%</u>	0.583 (LOS A) 0.601 (LOS B)
2. South Valley	95.40% <u>94.7%</u>	2.40% <u>2.3%</u>	2.90% <u>3.1%</u>	4.90% <u>5.3%</u>	0.614 (LOS B) 0.622 (LOS B)
3. Central	78.80% <u>77.6%</u>	8.60% <u>8.7%</u>	12.60% <u>13.7%</u>	21.20% <u>22.4%</u>	0.774 (LOS C) 0.785 (LOS C)
4. East Los Angeles	79.50% <u>79.0%</u>	6.00% <u>6.2%</u>	14.50% <u>14.9%</u>	20.50% <u>21.0%</u>	0.815 (LOS D) 0.819 (LOS D)
5. West Los Angeles	79.60% <u>78.4%</u>	6.70% <u>7.0%</u>	13.80% <u>14.7%</u>	20.40% <u>21.6%</u>	0.791 (LOS C) 0.804 (LOS D)
6. South Los Angeles	87.20% <u>86.4%</u>	5.40% <u>5.7%</u>	7.30% <u>7.8%</u>	12.80% <u>13.6%</u>	0.715 (LOS C) 0.723 (LOS C)

TABLE 4.1-11: SUMMARY OF EXISTING AM PEAK PERIOD ROADWAY SEGMENTS OPERATING CONDITIONS

Area Planning Commission	Percent of Segments Operating at: /a/				Weighted Average V/C Ratio (all segments) /a/
	LOS D or Better	LOS E	LOS F	Unsatisfactory LOS (E or F)	
7. Harbor	94.90% <u>94.5%</u>	2.20% <u>2.3%</u>	2.90% <u>3.2%</u>	5.10% <u>5.5%</u>	0.614 (LOS B) 0.622 (LOS B)
CITY OF LOS ANGELES	87.20%<u>86.5%</u>	4.80%<u>5.0%</u>	8.00%<u>8.6%</u>	12.80%<u>13.5%</u>	0.712 (LOS C) 0.722 (LOS C)

/a/ Segments include major highways, secondary highways, and collector streets within the City of Los Angeles.
LOS updated to reflect Year 2014 Operating Conditions.
SOURCE: Fehr & Peers, 2013 2015.

TABLE 4.1-12: SUMMARY OF EXISTING PM PEAK PERIOD ROADWAY SEGMENTS OPERATING CONDITIONS

Area Planning Commission	Percent of Segments Operating at: /a/				Weighted Average V/C Ratio (all segments) /a/
	LOS D or Better	LOS E	LOS F	Unsatisfactory LOS (E or F)	
1. North Valley	94.80% <u>94.4%</u>	2.10% <u>2.2%</u>	3.10% <u>3.4%</u>	5.20% <u>5.6%</u>	0.599 (LOS A) 0.623 (LOS B)
2. South Valley	92.20% <u>91.8%</u>	3.90% <u>3.9%</u>	3.90% <u>4.3%</u>	7.80% <u>8.2%</u>	0.649 (LOS B) 0.663 (LOS B)
3. Central	70.00% <u>67.4%</u>	11.00% <u>11.4%</u>	19.00% <u>21.1%</u>	30.00% <u>32.6%</u>	0.814 (LOS D) 0.837 (LOS D)
4. East Los Angeles	73.80% <u>71.5%</u>	8.60% <u>8.9%</u>	17.60% <u>19.6%</u>	26.20% <u>28.5%</u>	0.806 (LOS D) 0.837 (LOS D)
5. West Los Angeles	70.90% <u>71.0%</u>	9.30% <u>9.2%</u>	19.80% <u>19.8%</u>	29.10% <u>29.0%</u>	0.828 (LOS D) 0.847 (LOS D)
6. South Los Angeles	81.30% <u>81.2%</u>	7.50% <u>7.6%</u>	11.20% <u>11.2%</u>	18.70% <u>18.8%</u>	0.769 (LOS C) 0.788 (LOS C)
7. Harbor	93.50% <u>93.4%</u>	3.10% <u>3.1%</u>	3.40% <u>3.4%</u>	6.50% <u>6.6%</u>	0.624 (LOS B) 0.644 (LOS B)
CITY OF LOS ANGELES	82.10%<u>81.2%</u>	6.70%<u>6.8%</u>	11.30%<u>12.0%</u>	17.90%<u>18.8%</u>	0.743 (LOS C) 0.764 (LOS C)

/a/ Segments include major highways, secondary highways, and collector streets within the City of Los Angeles.
LOS updated to reflect Year 2014 Operating Conditions.
SOURCE: Fehr & Peers, 2013 2015.

Page 4.1-21, the end of the second paragraph is revised as follows:

More detailed land use planning may reveal the need for changes to the MP 2035, which will be undertaken (~~through a General Plan Amendment process~~) as needed to reflect these more detailed planning efforts. Changes to the network would not require a General Plan Amendment.

Page 4.1-21, the end of the paragraph (last two sentences) under the heading “Study Area and Reporting Framework” is revised as follows:

Finally, because Los Angeles is an important part of the greater Southern California region and many trips that use facilities within Los Angeles originate or are destined for locations beyond the city boundaries, impacts to traffic on roadways in neighboring jurisdictions are also reported in the analysis (see Table 4.1-22, 4.1-23 and 4.1-31). The specific reporting framework for each analyzed threshold is described in more detail below.

Pages 4.1-32, 4.1-33 and 4.1-34, the existing conditions level of service (LOS) results for roadway operating conditions are updated in tables 4.1-19, and 4.1-20. The two paragraphs under Table 4.1-20 are revised as indicated below. The updated LOS did not result in any changes to the impacts related to traffic operations (**Impact 4.1-2**) or corresponding Mitigation Measures (**T1** and **T2**). The updated LOS tables and text are revised as follows:

TABLE 4.1-19: SUMMARY OF AM PEAK PERIOD ROADWAY OPERATING CONDITIONS					
Area Planning Commission	Percent of Segments /a/ Operating at:				Weighted Average V/C Ratio (all segments) /a/
	LOS D or Better	LOS E	LOS F	Unsatisfactory LOS (E or F)	
EXISTING CONDITIONS					
1. North Valley	95.70% <u>95.5%</u>	4.60% <u>1.6%</u>	2.60% <u>2.8%</u>	4.30% <u>4.5%</u>	0.583 (LOS A) 0.601 (LOS B)
2. South Valley	95.10% <u>94.7%</u>	2.10% <u>2.3%</u>	2.90% <u>3.1%</u>	4.90% <u>5.3%</u>	0.614 (LOS B) 0.622 (LOS B)
3. Central	78.80% <u>77.6%</u>	8.60% <u>8.7%</u>	12.60% <u>13.7%</u>	21.20% <u>22.4%</u>	0.774 (LOS C) 0.785 (LOS C)
4. East Los Angeles	79.50% <u>79.0%</u>	6.00% <u>6.2%</u>	14.50% <u>14.9%</u>	20.50% <u>21.0%</u>	0.815 (LOS D) 0.819 (LOS D)
5. West Los Angeles	79.60% <u>78.4%</u>	6.70% <u>7.0%</u>	13.80% <u>14.7%</u>	20.40% <u>21.6%</u>	0.791 (LOS C) 0.804 (LOS D)
6. South Los Angeles	87.20% <u>86.4%</u>	5.40% <u>5.7%</u>	7.30% <u>7.8%</u>	12.80% <u>13.6%</u>	0.715 (LOS C) 0.723 (LOS C)
7. Harbor	94.90% <u>94.5%</u>	2.20% <u>2.3%</u>	2.90% <u>3.2%</u>	5.10% <u>5.5%</u>	0.614 (LOS B) 0.622 (LOS B)
City of Los Angeles	87.20% <u>86.5%</u>	4.80% <u>5.0%</u>	8.00% <u>8.6%</u>	12.80% <u>13.5%</u>	0.712 (LOS C) 0.722 (LOS C)
FUTURE NO PROJECT					
1. North Valley	94.80%	1.70%	3.50%	5.20%	0.664 (LOS B)
2. South Valley	93.10%	3.10%	3.80%	6.90%	0.649 (LOS B)
3. Central	73.30%	9.00%	17.70%	26.70%	0.824 (LOS D)
4. East Los Angeles	77.10%	6.80%	16.10%	22.90%	0.835 (LOS D)
5. West Los Angeles	74.00%	8.10%	17.90%	26.00%	0.849 (LOS D)
6. South Los Angeles	83.80%	6.70%	9.50%	16.20%	0.750 (LOS C)
7. Harbor	93.20%	2.80%	4.10%	6.80%	0.648 (LOS B)
City of Los Angeles	83.90%	5.60%	10.50%	16.10%	0.759 (LOS C)
FUTURE WITH PROJECT					
1. North Valley	87.06%	4.70%	8.24%	12.94%	0.747 (LOS C)
2. South Valley	84.57%	6.57%	8.86%	15.43%	0.738 (LOS C)
3. Central	51.58%	10.76%	37.67%	48.42%	1.063 (LOS F)
4. East Los Angeles	66.71%	7.65%	25.64%	33.29%	0.946 (LOS E)
5. West Los Angeles	64.67%	7.58%	27.75%	35.33%	0.932 (LOS E)
6. South Los Angeles	70.91%	9.79%	19.29%	29.09%	0.855 (LOS D)
7. Harbor	85.17%	4.40%	10.43%	14.83%	0.745 (LOS C)
City of Los Angeles	71.43%	7.78%	20.79%	28.57%	0.886 (LOS D)
/a/ Segments include major highways, secondary highways, and collector streets within the City of Los Angeles. Weighted Average V/C Ratios reflect the average V/C ratio of all segments in a given category, weighted proportionally by the volume of vehicular travel that occurs on each segment. SOURCE: Fehr & Peers, 2014 2015.					

TABLE 4.1-20: SUMMARY OF PM PEAK PERIOD ROADWAY OPERATING CONDITIONS

Area Planning Commission	Percent of Segments /a/ Operating at:				Weighted Average V/C Ratio (all segments) /a/
	LOS D or Better	LOS E	LOS F	Unsatisfactory LOS (E or F)	
EXISTING CONDITIONS					
1. North Valley	94.80% <u>94.4%</u>	2.10% <u>2.2%</u>	3.10% <u>3.4%</u>	5.20% <u>5.6%</u>	0.599 (LOS A) <u>0.623 (LOS B)</u>
2. South Valley	92.20% <u>91.8%</u>	3.90% <u>3.9%</u>	3.90% <u>4.3%</u>	7.80% <u>8.2%</u>	0.649 (LOS B) <u>0.663 (LOS B)</u>
3. Central	70.00% <u>67.4%</u>	41.00% <u>11.4%</u>	49.00% <u>21.1%</u>	30.00% <u>32.6%</u>	0.814 (LOS D) <u>0.837 (LOS D)</u>
4. East Los Angeles	73.80% <u>71.5%</u>	8.60% <u>8.9%</u>	17.60% <u>19.6%</u>	26.20% <u>28.5%</u>	0.806 (LOS D) <u>0.837 (LOS D)</u>
5. West Los Angeles	70.90% <u>71.0%</u>	9.30% <u>9.2%</u>	49.80% <u>19.8%</u>	29.10% <u>29.0%</u>	0.828 (LOS D) <u>0.847 (LOS D)</u>
6. South Los Angeles	81.30% <u>81.2%</u>	7.50% <u>7.6%</u>	41.20% <u>11.2%</u>	48.70% <u>18.8%</u>	0.769 (LOS C) <u>0.788 (LOS C)</u>
7. Harbor	93.50% <u>93.4%</u>	3.10% <u>3.1%</u>	3.40% <u>3.4%</u>	6.50% <u>6.6%</u>	0.624 (LOS B) <u>0.644 (LOS B)</u>
City of Los Angeles	82.10% <u>81.2%</u>	6.70% <u>6.8%</u>	11.30% <u>12.0%</u>	17.90% <u>18.8%</u>	0.743 (LOS C) <u>0.764 (LOS C)</u>
FUTURE NO PROJECT					
1. North Valley	92.90%	2.70%	4.40%	7.10%	0.705 (LOS C)
2. South Valley	90.30%	4.00%	5.80%	9.70%	0.712 (LOS C)
3. Central	58.50%	12.90%	28.60%	41.50%	0.917 (LOS E)
4. East Los Angeles	63.50%	9.80%	26.70%	36.50%	0.944 (LOS E)
5. West Los Angeles	71.40%	8.80%	19.80%	28.60%	0.913 (LOS E)
6. South Los Angeles	81.00%	8.00%	11.00%	19.00%	0.855 (LOS D)
7. Harbor	93.10%	3.30%	3.60%	6.90%	0.712 (LOS C)
City of Los Angeles	78.10%	7.30%	14.60%	21.90%	0.839 (LOS D)
FUTURE WITH PROJECT					
1. North Valley	82.68%	6.42%	10.90%	17.32%	0.791 (LOS C)
2. South Valley	79.18%	7.99%	12.83%	20.82%	0.805 (LOS D)
3. Central	38.77%	11.31%	49.92%	61.23%	1.154 (LOS F)
4. East Los Angeles	52.91%	9.41%	37.68%	47.09%	1.060 (LOS F)
5. West Los Angeles	59.63%	9.52%	30.84%	40.37%	1.003 (LOS F)
6. South Los Angeles	66.00%	11.11%	22.89%	34.00%	0.967 (LOS E)
7. Harbor	84.76%	3.94%	11.30%	15.24%	0.813 (LOS D)
City of Los Angeles	64.26%	9.04%	26.71%	35.74%	0.971 (LOS E)

/a/ Segments include major highways, secondary highways, and collector streets within the City of Los Angeles.
SOURCE: Fehr & Peers, 2014 2015.

Under Existing conditions in both the AM and PM peak periods, the Central APC has the highest share of segments operating at LOS E or F, followed closely by East Los Angeles and West Los Angeles. In the AM peak, ~~over 20~~ approximately 22 percent of Central APC segments operate at LOS E or F, increasing to ~~30~~ 33 percent in the PM peak. Citywide, ~~nearly 13~~ 13.5 percent of street segments operate at LOS E or F in the AM peak, rising to nearly ~~18~~ 19 percent in the PM peak.

Under Future No Project conditions, the percent of segments operating at LOS E or F increases in all APCs during both the AM and PM peak periods, ~~except in the West Los Angeles APC during the PM peak, where the share of segments operating at LOS E or F decreases slightly from 29.1 percent to 28.6~~

~~percent.~~ Citywide, the share of segments operating at LOS E or F increases from ~~12.8~~ 13.5 percent to 16.1 percent in the AM peak and from ~~17.9~~ 18.8 percent to 21.9 percent in the PM peak.

Page 4.1-44, the paragraph under “significance of impacts,” is revised as follows:

LAFD has a mandate to protect public safety and must respond to changing circumstances and therefore would act to maintain response times. The proposed project together with cumulative growth would increase congestion, which could impede emergency access. The steps that LAFD would have to take to maintain public safety are not reasonably foreseeable at this time. Options available to LAFD include expanding the Fire Preemption System, increasing staffing levels and adding new fire stations(s) to underserved areas. The potential for new fire station construction is speculative at the present time and is therefore not analyzed in this document. ~~Any construction impacts associated with new fire protection facilities would be within the impacts discussed in this document.~~ Depending on the location of new fire protection facilities operational impacts (primarily noise) could occur; however, such impacts are unforeseeable at this time. Because CEQA requires comparison to existing conditions, and a number of factors will contribute to the need for new LAFD facilities, including project actions, and because it is not possible to foresee all potential stressors to the fire protection system to which the project would contribute, in the interests of being conservative even with implementation of Mitigation Measure **T5**, impacts are considered potentially significant **and unavoidable**.

Page 4.1-47, the paragraph discussion under Impact 4.1-8 is revised as follows:

Construction-related impacts generally would not be considered significant for the anticipated roadway improvements due to their temporary and limited duration; mitigation identified below would ensure that construction impacts remain less than significant. Implementation of on-street improvements related to the enhanced networks would mostly consist of roadway restriping and limited changes to the physical configuration of curbs, and thus, would likely be short in duration lasting up to a few weeks. Therefore, temporary and short-term construction related impacts would occur; while these impacts have the potential to result in short-term significant impacts, standard construction techniques (preparation of a traffic control plan, flag men etc.) would reduce impacts to less than significance (these standard techniques are identified in the mitigation measure below). ~~however, these impacts would be less than significant.~~

Page 4.1-47 (and in the Summary), Mitigation Measure T6 is revised as follows:

T6 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 ~~MP 2035~~ plan will address construction duration and activities and include measures such as operating a temporary traffic signal or using flagmen adjacent to construction activities, as appropriate.

Page 4.1-48, the second paragraph under the subheading “Parking” is revised as follows:

~~Transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking along study streets and then seek parking farther away if convenient parking is unavailable.~~ The proposed project would result in a loss of parking spaces that could increase VMT if people drive farther to find parking or seek an alternate destination with more convenient parking. However, this increased VMT would typically be off-set by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts which may result from a shortfall in parking are anticipated to be minor and other transportation analyses reasonably address potential secondary impacts. Therefore, the proposed project would result in less-than-significant traffic impacts related to parking.

LAND USE AND PLANNING

As described in **Section 1.3** of the Final EIR (and reflected in the Corrections and Additions above for the Project Description), the Generalized Circulation, NEN, BEN, Bicycle Lane Network, and VEN maps were updated based on comments received and technical corrections. The land uses in the vicinity of these changes would be affected in the same manner as described on page 4.2-28 through 4.2-31 and these changes would not alter the conclusions of the EIR.

AIR QUALITY

Page 4.3-26, first sentence below Table 4.3-15, is revised as follows

The results show that the significantly increased delay at the already congested ~~Westwood/Santa Monica Boulevard~~ intersection would not cause an exceedance of the applicable standards.

GREENHOUSE GAS EMISSIONS

Page 4.4-8, the following is added to the end of the first paragraph:

...For this project, the City determined that GHG emissions resulting from the proposed project would be significant if the Project condition caused an increase over Existing or Future No Project (Business-As-Usual) conditions. These thresholds were selected to 1) coincide with the CEQA requirement to compare impacts to existing conditions and 2) provide a comparison to business as usual. In this case, business-as-usual refers to the future conditions without implementation of the project, or the No Project Alternative. The No Project Alternative includes “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services” (CEQA Section 15126.6 [e][2]).

NOISE AND VIBRATION

Page 4.5-11, last paragraph, third to last sentence is revised as follows

The overall ~~effect~~ effect of bus....

Page 4.5-12, the last sentence of the last paragraph before the heading “Mitigation Measures” is revised as follows:

Similarly, bicycle rider exposure to changed noise levels as a result of the proposed project is also not considered significant as it is not reasonably foreseeable that the types of noises riders would be exposed to (traffic related noises) would be of a level or of a duration to reach deafening or dangerous levels (i.e. the increased noise on roadways would not have a significant impact on bicycle riders).

Page 4.5-14, the following is added to the paragraph under the headings “Significance of Impacts After Mitigation” and “Construction.”

Therefore construction-related vibration impacts would be less than significant after mitigation.

ALTERNATIVES

Page 5-1, the first bullet on the page is revised as follows:

- **Transportation and Traffic (Traffic Congestion, Neighborhood Intrusion, CMP Segments, Emergency Vehicle Access)**. Implementation of Mitigation ...

Page 5-28, last paragraph, the following (including associated footnotes) is added after the third sentence:

For example, the percentage of people traveling by bicycle has grown in the cities that have also invested in low stress bicycle network facilities that are similar in scale to those proposed on the BEN in the MP 2035. An earlier analysis of the 2010 Bicycle Plan found that completion of the 1,684 miles of bikeways proposed in that Bicycle Plan would be projected to achieve 3.6 percent bicycle commute mode share, which was based on a study of 43 large cities across the country that implemented standard bicycle facilities.⁵⁷ However, this projection did not factor in the low stress facilities in the MP 2035, which would attract a much larger demographic than standard bicycle lanes. The experience of other U.S. cities show protected bicycle lanes results in faster adoption of bicycle commuting by a greater portion of the population than standard facilities. Bicycle commuting doubled in just five years (2008-2013) in New York City and Washington D.C., the two cities that first started building modern protected bicycle lanes,⁵⁸ and the average protected bike lane shows bike counts increase by 75 percent in the first year.⁵⁹ A protected bicycle lane in New York City saw 190 percent increase in weekday ridership, and 32 percent of those biking were under 12 years.⁶⁰ In 2012, bicycle trips were 36 percent of commute trips in Copenhagen,⁶¹ a city that has invested in a high-density network of protected bicycle lanes.

OTHER CEQA CONSIDERATIONS

Page 6-7, the first paragraph under the subheading “6.5 Effects Determined to be Less Than Significant” is revised as follows:

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. Such a statement *may* be contained in an attached copy of an Initial Study. For this EIR the City chose not to prepare an Initial Study (as indicated on page 8 of the Notice of Preparation included in Appendix A and as allowed under Guideline Section 15063(a)) and therefore the brief discussions of less than significant impacts are included in this subsection of the RDEIR (and were included in the Draft EIR).

Page 6-13, the last sentence on the page is revised as follows:

~~In addition, these~~ As described in Section 6.4, proposed enhancements would have significant impacts with respect to traffic, noise and biological resources. It would not have other impacts that are individually limited, but cumulatively considerable or that would cause substantial adverse effects on human beings, either directly or indirectly.

⁵⁷Dill, 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

⁵⁸People for Bikes website. <http://www.peopleforbikes.org/blog/entry/nyc-and-dc-protected-lane-pioneers-just-doubled-biking-rates-in-4-years> Accessed May 7, 2015

⁵⁹Monsere, C., et al., 2014. *Lessons from the Green Lanes: Evaluating Protected Bike Lanes in the U.S.*. National Institute for Transportation and Communities. <http://www.peopleforbikes.org/blog/entry/everywhere-they-appear-protected-bike-lanes-seem-to-attract-riders-access-on-May-7-2015>

⁶⁰NYC DOT, 2012. *Prospect Park West: Traffic Calming & Bicycle Path*. http://www.nyc.gov/html/dot/downloads/pdf/2012_ppw_trb2012.pdf accessed on May 7, 2015

⁶¹Copenhagen Bicycle Account 2012, Cycling Embassy of Denmark. <http://www.cycling-embassy.dk/2013/06/03/6995/>, website accessed May 7, 2015

APPENDICES

Appendix C, top of the last page (page 3) the first sentence/paragraph is revised as follows:

The transportation projects improvements included in the model are documented in the attached table. include all transportation improvements that are fully funded as identified in the sources listed above, specifically the following notable improvements are included in the model:

- Wilshire Boulevard Bus Rapid Transit Phases I and II, including peak period bus lanes on portions of Wilshire Boulevard within the City of Los Angeles.
- Expo Phase II, including light rail service from terminus of Expo Phase I in Culver City to Santa Monica at 4th Street & Colorado Avenue.
- Westside Subway Extension, including extension of the Metro Purple Line heavy rail subway from Wilshire & Western Station to Westwood VA Campus.
- Crenshaw Transit Line, including light rail transit line between Exposition line and Metro Green Line via Crenshaw Boulevard, Harbor Subdivision and Aviation Boulevard.
- I-405 Capacity improvements, including new HOV lane on northbound I-405 and interchange improvements (this improvement was completed in 2014; however, additional capacity was not reflected in the existing conditions analysis in the EIR).

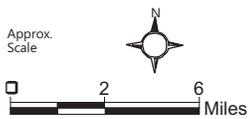
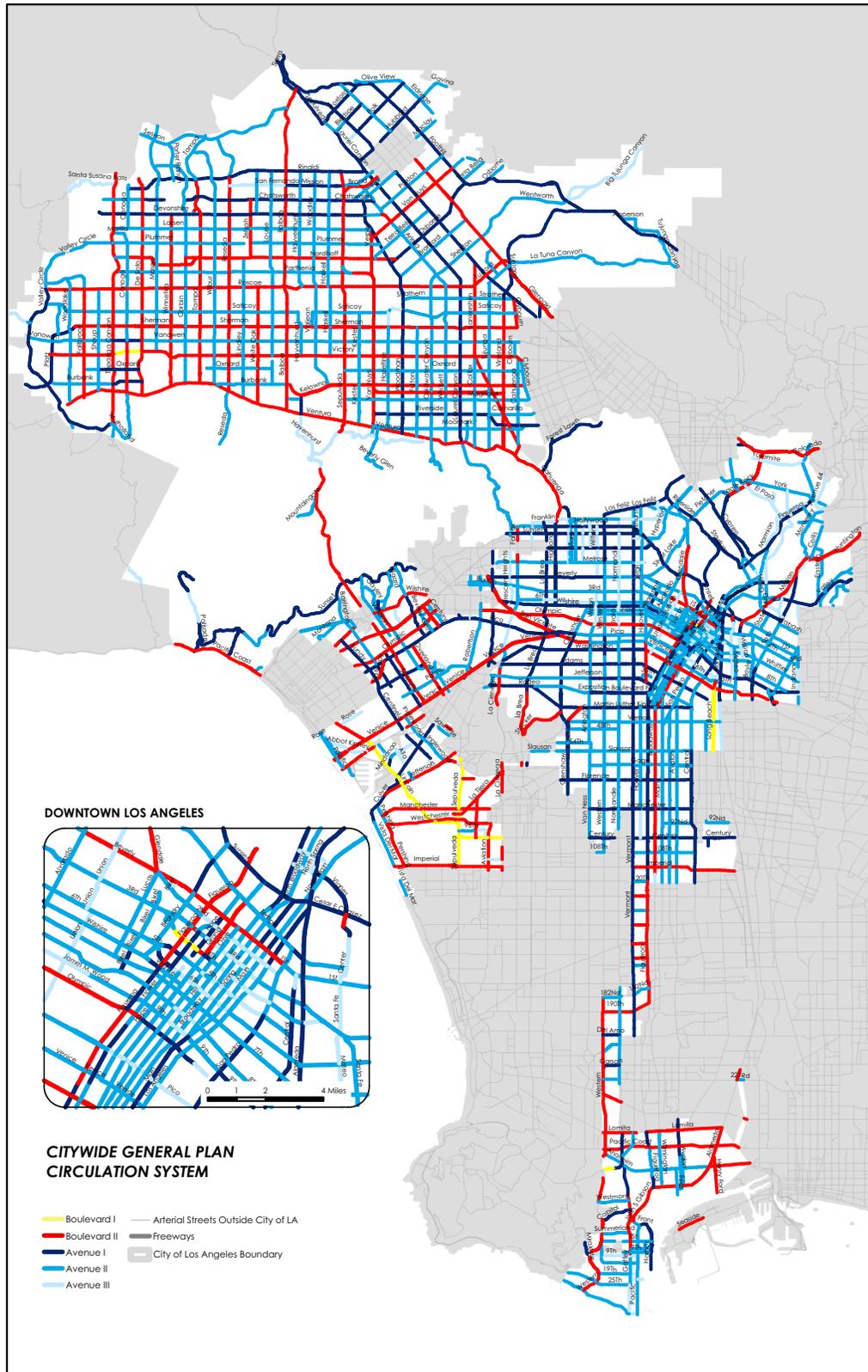


FIGURE 3-1

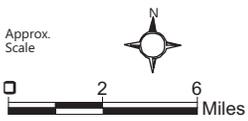
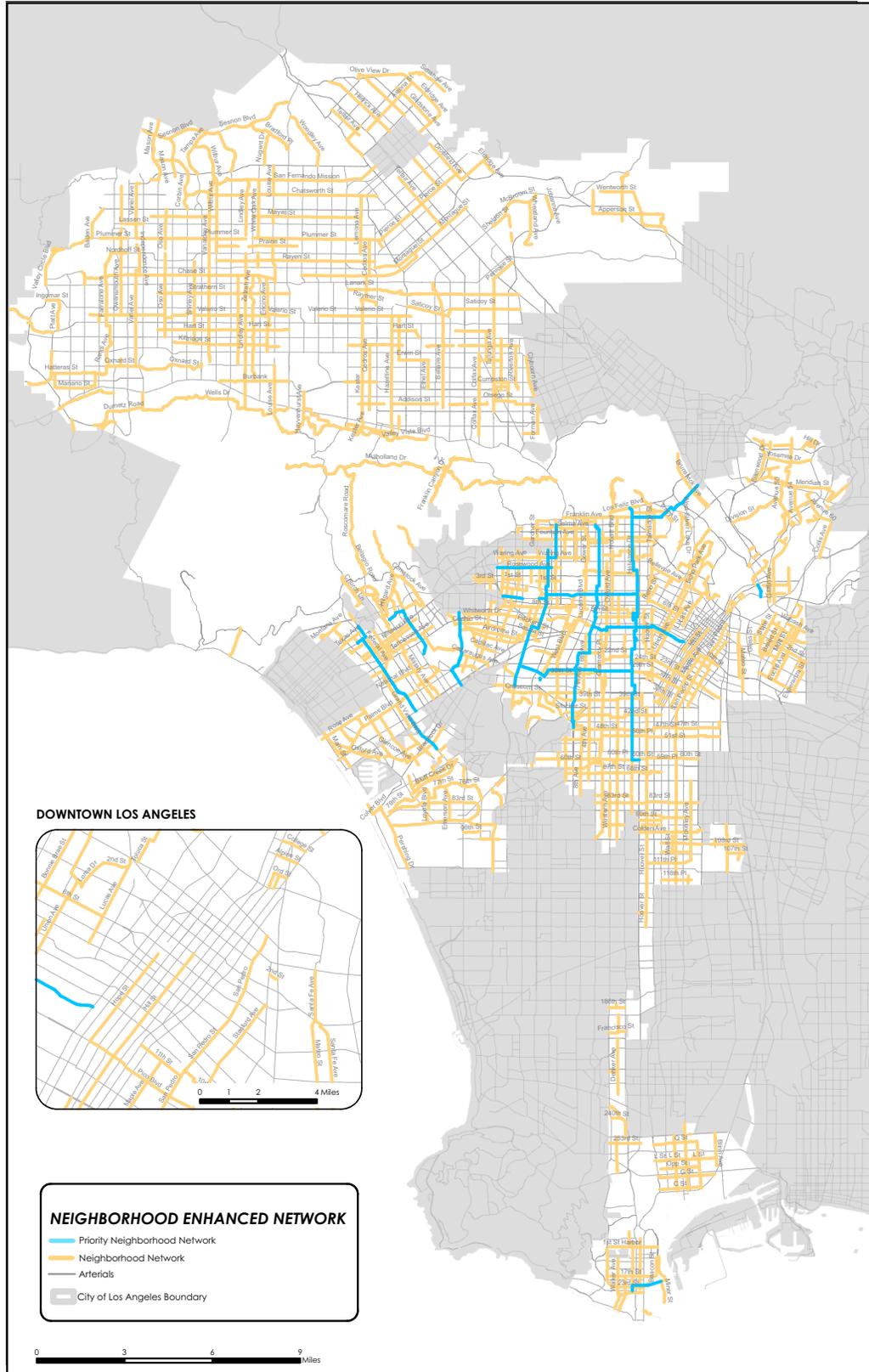


FIGURE 3-3

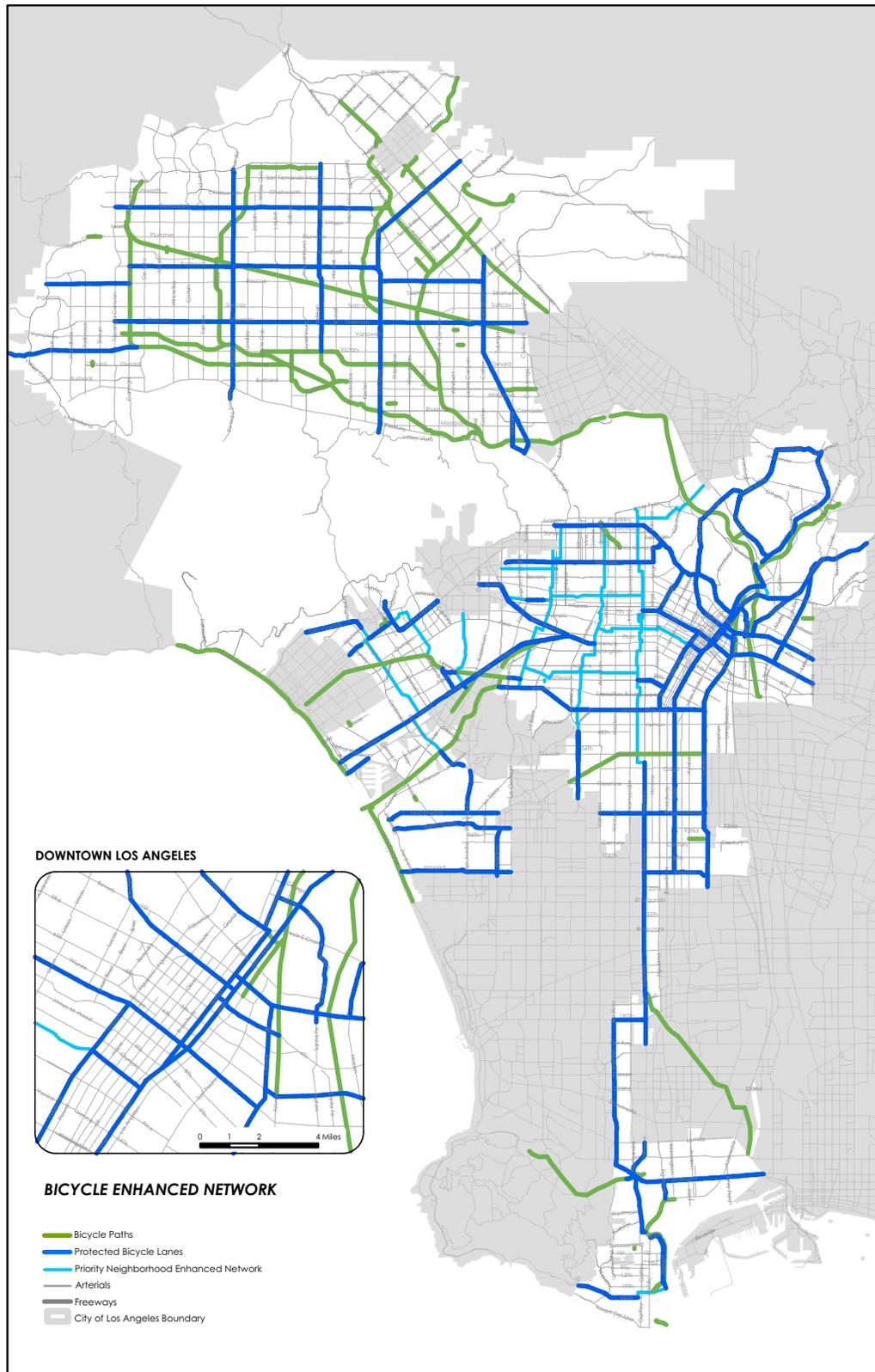


FIGURE 3-4A

Source: City of Los Angeles, 2015.

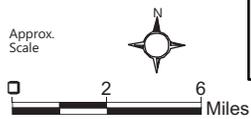
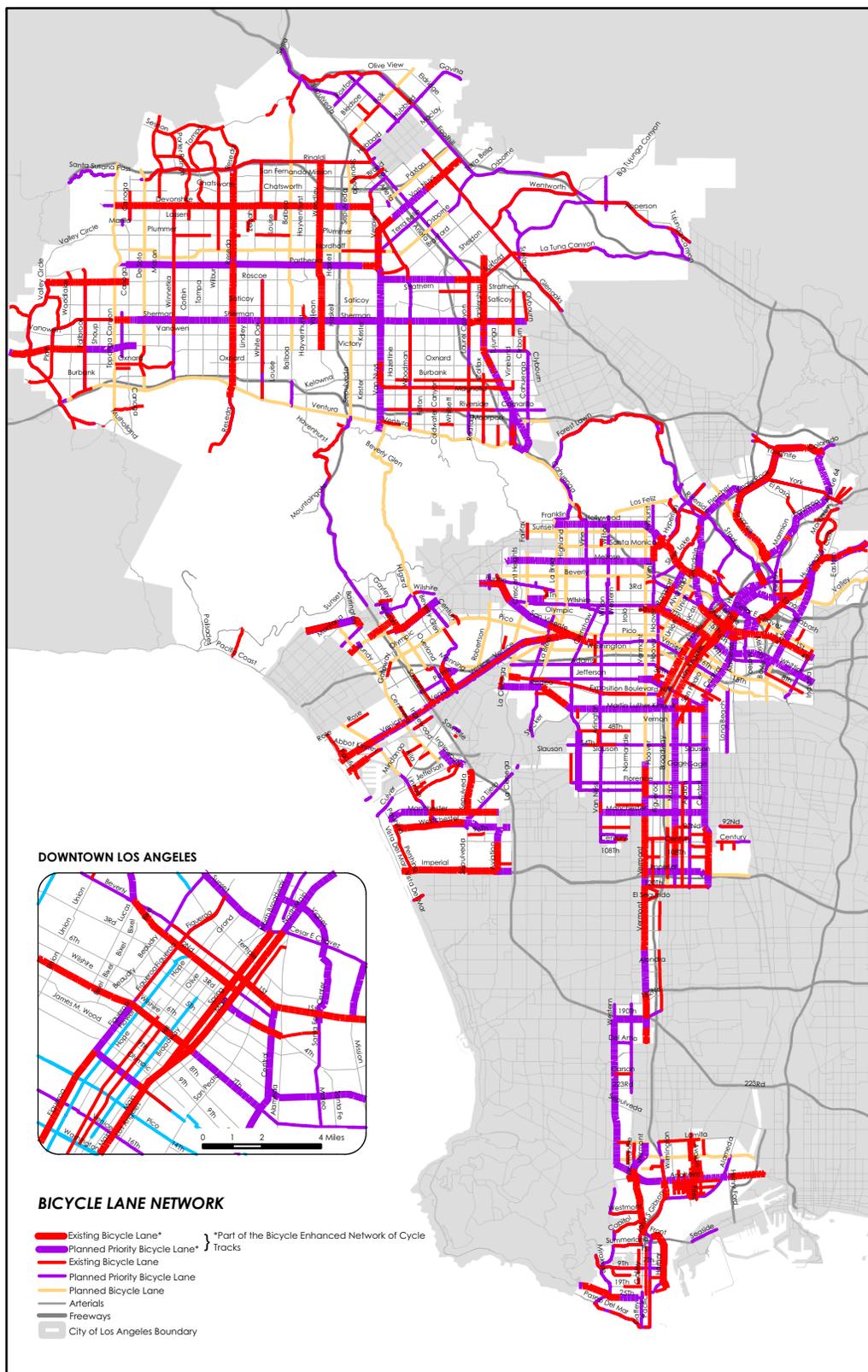


FIGURE 3-4B

Source: City of Los Angeles, 2015.

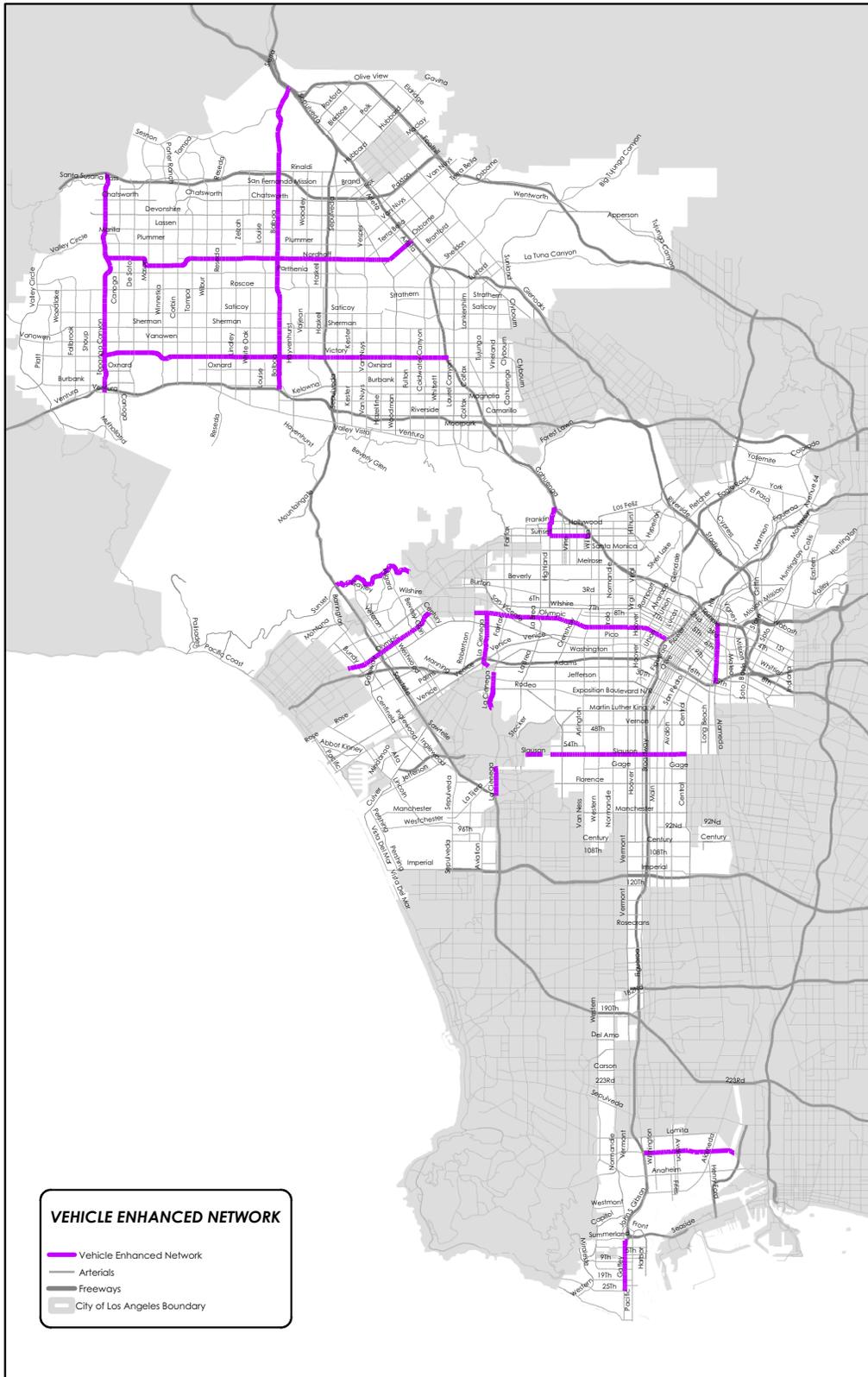


FIGURE 3-6

Source: City of Los Angeles, 2015.

4.0 MITIGATION MONITORING PLAN

Public Resources Code (PRC) Section 21081.6 and California Environmental Quality Act (CEQA) Guidelines Section 15097 require adoption of a Mitigation & Monitoring Plan (MMP) for all projects for which an Environmental Impact Report (EIR) has been prepared. This requirement was originally mandated by Assembly Bill (AB) 3180, which was enacted on January 1, 1989 to ensure the implementation of all mitigation measures adopted through the CEQA process. Specifically, PRC Section 21081.6 states that "...the agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment...[and that the program]...shall be designed to ensure compliance during project implementation."

AB 3180 provided general guidelines for implementing monitoring and reporting programs, which are enumerated in more detail in CEQA Guidelines Section 15097. However, specific reporting and/or monitoring requirements to be enforced during project implementation shall be defined prior to final approval of the City of Los Angeles Mobility Plan 2035 (MP 2035 or proposed project) by the decision-maker. In response to established CEQA requirements, the MMP shall be submitted to the City of Los Angeles (Lead Agency) for consideration prior to certification of the EIR. Although the Lead Agency may delegate monitoring responsibilities to other agencies or entities, the Lead Agency "...remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program."

The MMP describes the procedures for the implementation of the mitigation measures to be adopted for the proposed project as identified in the Draft and Recirculated Draft EIR and identified in the Final EIR. The MMP for the proposed project will be in place through the planning horizon of the Plan (2035) or until the Plan and EIR are updated again. The City of Los Angeles Department of City Planning (DCP) shall be responsible for administering the MMP activities or delegating them to staff, other City departments (e.g., Department of Building and Safety [DBS], Department of Public Works [DPW], etc.), consultants, or contractors. The City will also ensure that monitoring is documented through reports (as required) and that deficiencies are promptly corrected. The City may choose to designate one or more environmental monitor(s) (e.g. City building inspector, project contractor, certified professionals, etc., depending on the provision specified below).

Each mitigation measure is identified in **Table 4-1** and is categorized by environmental topic and corresponding number, with identification of:

- The Implementing Agency;
- The Enforcement Agency and Monitoring Agency – this is the agency or agencies that will monitor the measure and ensure that it is implemented in accordance with this MMP.
- Monitoring Phase and Action – this is the criteria that would determine when the measure has been accomplished and/or the monitoring actions to be undertaken to ensure the measure is implemented.

All agencies and departments are in the City of Los Angeles, unless otherwise noted.

TABLE 4-1: MITIGATION MONITORING PLAN				
No.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase and Action
TRANSPORTATION, PARKING, & SAFETY				
T1	Los Angeles Department of Transportation (LADOT) will adjust traffic signal timing after the implementation of the proposed project (both along project routes and parallel roadways if traffic diversions have occurred as a result of the proposed project). This adjustment would be necessary, especially at the intersections where roadway striping would be modified. 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.)	DCP, LADOT	LADOT,	Pre-construction, Coordination between DCP and LADOT to identify and implement appropriate signal timing based on the characteristics of the mobility improvement.
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.	DCP	DCP, LADOT	As applicable, the City shall require of development projects, prior to construction, preparation of a TDM report describing TDM trip-reducing measures and procedures for implementation.
T3	In areas where implementation of the proposed project could potentially result in diversion of traffic to adjacent residential streets, LADOT shall monitor traffic on identified residential streets, upon request submitted through the Council Office, to determine if traffic diversion occurs. If traffic on residential streets is found to be significantly impacted, in accordance with LADOT’s Traffic Study Policies and procedures, LADOT will work with neighborhood residents to identify and implement appropriate traffic calming measures.	DCP, LADOT	LADOT,	Periodic Monitoring during operation; Conduct traffic counts and assess whether traffic diversion triggered by the proposed mobility improvements requires traffic calming measures to reduce significant impacts into residential neighborhoods.
T4	In areas where the implementation of the proposed project could potentially affect transportation systems managed by other agencies, such as Caltrans or Metro, or neighboring jurisdictions, the City of Los Angeles shall coordinate with these entities to identify transportation improvements in accordance with the goals and policies of Mobility Plan 2035 and seek opportunities to jointly pursue funding. Mobility solutions shall be focused on safety, enhancing mobility options, improving access to active modes, and implementing TDM measures to achieve both local and regional transportation and sustainability goals.	DCP	LADOT	Pre-construction, Coordination and Identification of Improvements that could be implemented through joint funding agreements.
T5	LADOT, Los Angeles Fire Department (LAFD) and Department of City Planning (DCP) shall coordinate and review design plans involving lane reallocation to ensure that emergency response access is adequately maintained (for example by expanding the Fire Preemption System).	DCP	DCP, LADOT, LAFD	Pre-construction; Coordination to implement design plans that maintain emergency access.

TABLE 4-1: MITIGATION MONITORING PLAN				
No.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase and Action
T6	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 address construction duration and activities and include measures such as operating a temporary traffic signal or using flagmen adjacent to construction activities, as appropriate.	DCP	DCP, LADOT	Pre-construction; Preparation of traffic control plan to identify potential construction traffic impacts, and the identification of mitigation measures to minimize construction impacts and ensure the safety of proposed improvements.
LAND USE AND PLANNING				
LU1	Prior to the decision to remove on-street parking, the City of Los Angeles shall meet with the affected business and property owners to discuss the potential for the removal of on-street parking to affect the economic viability of the affected businesses. The City shall identify parking replacement options to businesses that do not have off-street parking and would be substantially affected by the permanent removal of on-street parking.	DCP	DCP	During project construction. City to meet with all affect businesses and property owners who would have parking removed as a result of a mobility enhancement and develop suitable parking replacement options to sustain the economic livelihood of affected businesses and property owners.
NOISE AND VIBRATION				
N1	Construction activity that would last more than a day, that could increase ambient noise by more than 5 dBA, and would be located within 500 feet of a sensitive land use shall incorporate measures to reduce noise levels at sensitive receptors including, but not limited to, sound walls, sound blankets on impact equipment, and engine mufflers to reduce noise levels to acceptable levels. The noise reduction levels achieved by the measures shall limit noise increases to less than 5 dBA over the exiting ambient levels.	DCP	DCP	Construction; Preparation of a Noise Control Plan (prepared to professionally accepted acoustical engineering standards) to identify sensitive receptors within 500 feet of the proposed enhancement, conduct ambient noise measurements, and identify the increases in construction noise based on the required equipment to implement the mobility enhancement. The Noise Control Plan would identify measures to reduce noise increases at sensitive receptors within 500 feet to less than 5 dBA over ambient.
N2	A project-specific vibration analysis shall be completed if the City determines that construction equipment would be located within 11 feet of non-engineered timber and masonry buildings (typical of residential buildings and institutional buildings). Potential vibration impacts shall be mitigated such that vibration levels do not exceed 0.3 inches per second at 11 feet. Methods to reduce vibration include, but are not limited to, choosing to use light weight equipment when an option between equipment types is available and avoiding impact equipment (e.g., jackhammers).	DCP	DCP	Pre-construction; Preparation of a Vibration Control Plan (prepared to professionally accepted acoustical engineering standards) for the operation of construction equipment within close proximity to buildings (11 feet).

TABLE 4-1: MITIGATION MONITORING PLAN				
No.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase and Action
BIOLOGICAL RESOURCES				
B1	<p><i>Special-Status Species and Habitat.</i> For future enhancements occurring within 200 feet of a Significant Ecological Area designated by the County of Los Angeles or within 200 feet of areas containing native vegetation, such as open space and undeveloped areas, a project-specific biological resource survey and assessment shall be conducted and prepared that discloses any potential impacts to special status species and habitats, and mitigates, to the extent feasible, the impacts of the mobility improvements. In addition, prior to implementation of mobility improvements, all required permits must be obtained; permits for work in wetland and riparian habitats frequently require project-specific measures to preserve resources.</p>	DCP	DCP,	During pre construction; Biological Resource Survey, prepared by a qualified biologist, for all enhancements within 200 feet of Significant Ecological areas or areas containing native vegetation, such as open space and undeveloped areas and adherence to mitigation measures identified in survey.
B2	<p><i>Wetland Habitat.</i> For mobility improvements that extend into the Ballona wetlands, all applicable wetland permits shall be acquired. These permits include, but would not be limited to, a Section 404 Wetlands Fill Permit from the United States Army Corps of Engineers, or a Report of Waste Discharge from the Regional Water Quality Control Board (RWQCB), and a Section 401 Water Quality Certification from the RWQCB. Additionally, a Section 1602 Streambed Alteration Agreement from the California Department of Fish and Wildlife (CDFW) would be required for development that would cross or affect any stream course.</p> <p>Where feasible, the maximum amount of existing wetlands shall be preserved and minimum 25- to 50-foot buffers around all sides of these features shall be established. In addition, the final project design shall not cause significant changes to the pre-project hydrology, water quality, or water quantity in the wetland that is to be retained. This shall be accomplished by avoiding or repairing any disturbance to the hydrologic conditions supporting these wetlands, as verified through wetland protection plans.</p> <p>Where avoidance of the Ballona Wetlands is not feasible, then mitigation measures shall be implemented for the project-related loss of any existing wetlands on site, such that there is no net loss of wetland acreage or habitat value. Wetland mitigation shall be developed as a part of the Section 404 Clean Water Act permitting process, or for nonjurisdictional wetlands, during permitting through the RWQCB, CDFW and/or USFWS. Mitigation is to be provided prior to construction related impacts on the existing wetlands. The exact mitigation ratio is variable, based on the type and value of the wetlands affected by the project, but agency standards typically require a minimum of 1:1 for preservation and 1:1 for construction of new wetlands. In addition, a Wetland Mitigation and Monitoring Plan shall be developed that includes the following:</p>	DCP	DCP, CDFW, RWQCB	During preconstruction; Preparation and completion of permitting applications/process.

TABLE 4-1: MITIGATION MONITORING PLAN				
No.	Mitigation Measure	Implementing Agency	Enforcement and Monitoring Agency	Monitoring Phase and Action
	<ul style="list-style-type: none"> • Descriptions of the wetland types, and their expected functions and values. • Performance standards and monitoring protocol to ensure the success of the mitigation wetlands over a period of five to ten years. • Engineering plans showing the location, size and configuration of wetlands to be created or restored. • An implementation schedule showing that construction of mitigation areas shall commence prior to or concurrently with the initiation of construction. • A description of legal protection measures for the preserved wetlands (i.e., dedication of fee title, conservation easement, and/ or an endowment held by an approved conservation organization, government agency or mitigation bank). 			
B3	<p><i>Migratory Birds.</i> To prevent the disturbance of nesting native and/or migratory bird species, the City shall require that clearing of street trees or other vegetation should take place between September 1 and February 14. If construction is scheduled or ongoing during bird nesting season (February 15 to August 31), the City of Los Angeles shall require that a qualified biologists conduct a nesting bird survey within 250 feet of the construction activity, no less than 14 days and no more than 30 days prior to the commencement of construction activities. Surveys shall be conducted in accordance with CDFW protocols, as applicable. If no active nests are identified on or within 250 feet of the construction activity, no further mitigation is necessary. A copy of the pre-construction survey shall be submitted to the Department of City Planning. If an active nest is identified, construction shall be suspended within 100 feet of the nest until the nesting cycle is complete, as determined by a qualified ornithologist or biologist.</p>	DCP	DCP	Pre-construction; biological survey of street trees by qualified biologist for construction during nesting season.
SOURCE: TAHA, 2015.				