

## Appendix A: Comments that are summarized by Master Comments

### Comments Summarized by Master Comment 2:

- Homeowners/landowners don't seem to know about project, bike supporters do but not others. Who received notice of webinar?
- Have not solicited enough community input.
- Legal requirement to adequately involve the public.
- Notice did not provide e-mail or physical address to send comments.
- Notice to a complete set of stakeholders in the impacted area.
- Should have had posting in areas where disruption of traffic or parking could occur.
- Circulation period poorly publicized. Comment period should be extended.
- Forward comments to Mayor and Council.
- Several times during the City staff presentation, reference was made to input that had been received from the "Bicycle Coalition". However, there was no reference to or evidence of input that had been received from the several homeowners associations in the area or from the many business owners/operators. A greater effort to incorporate information from those sources should be made as the consideration of the feasibility of the proposed bicycle lanes progresses.
- How are parkers notified that their spaces may be going away?
- No hearing in South LA.
- Adequate notice should include flyers posted in affected areas and on windshields of areas that would lose parking. Hand flyers to people at red lights.
- Public hearings should use procedures equivalent to or more inclusive as those required of state agencies under the state Administrative Procedures Act.
- Bike lanes require community input and analysis to provide the best design options and solutions to address impacts.

### Comments Summarized by Master Comment 3:

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

- From the Streets and Highway Code 891.2. A city or county may prepare a bicycle transportation plan, which shall include, but not be limited to, the following elements:

(a) The estimated number of existing bicycle commuters in the plan area and the estimated increase in the number of bicycle commuters resulting from implementation of the plan.

(b) A map and description of existing and proposed land use and settlement patterns which shall include, but not be limited to, locations of residential neighborhoods, schools, shopping centers, public buildings, and major employment centers.

There were no maps as described. Not showing residential communities or commercial districts does not show the full impact of Bike lanes on the surrounding communities. 20 of the 35 Community plans are impacted by the Bike Plan. Maps that show existing and proposed Land user and settlement patterns can be found in Bicycle plans of other California Cities and are necessary to evaluate impacts that the loss of parking and motorized travel lanes would have on businesses and adjacent Residential communities. This is a serious issue.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

#### **Comments Summarized by Master Comment 5:**

- The Framework Element was last updated in 2002 filed a statement of overriding considerations for the Bicycle plan which this DEIR and the Bicycle Plan do not address.
- In addition to the Framework Element, other mitigation measures recommended by the Final EIR include:
  - Ensure that all City Streets have a curb lane wide enough to accommodate bicycle traffic; and
  - Require that all new developments install in all garages electric plugs that can recharge electric vehicles. Pursuant to Section 21081 of the Public Resources Code, the City finds the first mitigation measure to be physically and economically infeasible without extensive condemnation of private property or purchase of right-of-way. A “built out” city cannot ensure that all the streets will be rebuilt with the required width for bicycle routes. Also, there are streets where any kind of bicycling would be unsafe. Therefore, the City will not adopt this mitigation measure and will adopt a substitute measure as follows: "Ensure that all City streets designated in the Bicycle Plan as bicycle routes have a curb lane wide enough to accommodate bicycle traffic .
- Curb lane wide enough. Wide curb lane - A 14 foot (or greater) wide outside lane adjacent to the curb of a roadway, that provides space for bicyclists to ride next to (to the right of) motor vehicles. Also referred to as a “wide outside lane”. If adjacent to parking, 22 feet in width may also be considered a wide curb lane.
- DEIR picks and chooses from many objectives and policies of the Framework Element and misses important ones critical to an objective EIR. The comment refers to Policy 5.3.4 – Streets. Identify commuter and recreational bicycle routes that link major destinations within the City, and establish and implement standards to maintain their safety and security. The comment also includes Program 3 and Program 4. Program 3 directs the City to formulate and periodically update a citywide Transportation Element that address multiple measures that include VMT reduction measures, access to employment centers and non-motorized transportation systems, and a host of other transportation related measures in the context of the regional transportation system. Program 4 directs the City to develop Transportation Improvement and Mitigation Plans (TIMPs) that will expedite approvals of new development applications and streamline traffic mitigation procedures. The program mentions vehicle, transit and bicycle access plans, and neighborhood traffic management as an example of a number of measures to be included in TIMPs.

#### **Comments Summarized by Master Comment 6:**

- Out of the 20 Community plans the 2010 Bike Plan will impact, only two (Hollywood and Boyle Heights) have a policy listed. The rest make do with Objectives which are much easier to manipulate rather than Policies which Implement the Community Plans. Community plans do a whole lot more than provide the necessary focus on bicyclists at the Community level. Pick any Community plan (below we quote from the West LA Community plan) and look at what it says about the Purpose of the Community plan.
- Role of the Community Plan. The Community Plans are intended to promote an arrangement of land uses, streets and services which will encourage and contribute to the economic, social and physical health, safety, welfare and convenience of the people who live and work in the community.
- The 2010 Bicycle Plan lays out the process for implementing the Bike Plan by updating the Community Plans when it states the following: The City is currently in the process of updating all 35 Community Plans that together comprise the Land Use Element of the General Plan. As each Community Plan is updated future bicycle lanes in that planning area will be analyzed with regard to potential

environmental impacts. Currently future bicycle lanes are being analyzed for the Sylmar, Granada Hills, Southeast, South, San Pedro, and West Adams/Leimert Park Community Plans. That is not being done and as a result: This Bicycle plan is inconsistent with the Community Plans.

**Comments Summarized by Master Comment 7:**

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

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

Much of the 2010 plan deals with Recreational use, fitness, and sport use. The Plan states that in 2000, 0.61% of commuters used a bicycle to commute to work each day and by 2008 that number had risen to 0.90%. That still means that less than 1% of Angelinos use a bicycle to commute to work on a daily basis. While that number may be laudable it shows that the vast majority of those who will use the Class 2 routes in the plan will not be using it as intended for “the functional commuting needs of the employee, student, business person, and shopper” and as such different criteria must be used as the foremost consideration in route selection. That can only be achieved through a full EIR which takes into consideration the full impact of this plan. A Final EIR would give the community the ability to challenge the assertions in the DEIR and 2010 Plan. It would also give the City time to provide evidence that such programs exist and will have sufficient funding.

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

**Comments Summarized by Master Comment 8:**

- The standard practice should be to construct complete streets while prioritizing project selection and project funding so that jurisdictions accelerate development of a balanced, multimodal transportation network.
- In Los Angeles the Transportation Element is the Circulation Element. The 1996 Framework Element stated that the Transportation Element supersedes the Circulation Element. That means that the 2010 Bicycle Plan which proposes to make changes to 20 of the 35 Community plans must conform to the Complete Streets Act instead of just planning for Bike Lanes.
- It should be clear that the City of Los Angeles is merely giving lip service to Complete Streets in this update to the Bicycle Plan. At the minimum they must complete a FEIR and show how this plan complies with AB 1358.
- Use Complete Streets Act bicycle lane construction opportunities to push innovative design/experimental design (like green lane on 6<sup>th</sup> St.) and best practices in South Los Angeles.

**Comment Summarized by Master Comment 9:**

- The 2010 Bike Plan which is a major update of the Circulation Element discriminates against persons with Disabilities. Recent litigation (CALIF v. City of Los Angeles) against the City of Los Angeles showed that there are over 800,000 persons with Disabilities living within the City of Los Angeles. The 2010 Bike Plan does not address their needs and discriminates against them in favor of persons who can ride Bicycles.
- The 2010 plan makes 2 passing references to persons with disabilities. One was about children (K8) and the other with ADA compliance but there were no programs to help either in this Bicycle Plan. That’s unfortunate but the DEIR for the Plan is even worse stating the plan would encourage children, including those with disabilities, to walk and bicycle to school. I suppose those children as well as adults who cannot ride a bicycle or walk have no place in this plan.

**Comments Summarized by Master Comment 10:**

- Why not have bicycle lanes next to the curb rather than next to the parked cars?
- Look to the past. Elevated California Cycleway was proposed in 1900 from Pasadena to Los Angeles, over a mile was built including night illumination. Attractive alternative to driving. Propose this method for encouraging and promoting bike use not taking auto lanes or parking spaces.
- The report should have proposed alternatives to have less impacts on the regional roadway system in the area of S. Figueroa Street and in concurrence with CEQA/NEPA guidelines. Other alternatives may have less impact on motorist and regional; traffic operation in the area.
- Car pooling and ride share should be rewarded.
- More buses per stop should be planned.
- Using sidewalks for bicyclists could be an option.
- Bike buffers as in Santa Monica.
- If the City is serious about creating SAFE bike lanes it needs to identify funding mechanisms to do so.
- See the City of Davis, California for a way to create bike lanes which do not impact the flow of traffic or negotiation of businesses and still keep bicyclists safe.
- Request an Alternative to My Figueroa that provides two vehicular northbound and southbound lanes (not including turn pockets) on Figueroa between Venice and MLK, and maintains all on-street parking in areas critical to businesses.
- Figueroa Street should be enhanced without making congestion worse and maintain the current number of through and peak-period lanes along the corridor. Bicycle lanes can be added without removing travel lanes by modifying the proposal to maintain peak period travel in parking lanes between 21<sup>st</sup> Street and Exposition Boulevard. The revised proposed cross section shows two travel lanes in each direction, a two-way center median, one full time parking lane and one buffered bicycle lane in each direction. This is an improvement over what is shown in the EIR (one southbound and two northbound lanes), it still eliminates the existing third peak hour travel lane in each direction (now used for parking in the non-peak period). Unacceptable. Looking for analysis of new configuration.
- Oppose any bike plan that limits the number of vehicular lanes to one north and one south.

**Comments Summarized by Master Comment 16:**

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

**Comments Summarized by Master Comment 21:**

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

- The EIR identifies no mitigation for transit impacts.
- DEIR failed to analyze the bike lanes based on multi-modal transportation objectives and incorporate best practices design standards to mitigate adverse impacts.
- Figueroa Street: This street currently experiences high volumes of transit bus service and passengers along the proposed project location. Proposed project improvements along this segment of Figueroa Street will adversely impact bus operations. In an effort to mitigate these impacts, Metro will relocate southbound express bus services from Figueroa Street to parallel segments of Flower Street, and municipal bus operators may also move lines. Several bus stops on southbound Flower Street are in poor condition in terms of sidewalk quality and have inadequate lighting. In the event that service is relocated to southbound Flower Street, the project sponsor should consider lighting upgrades and/or new shelters at these stops to help ensure sufficient accommodation of increased bus service and bus stop passenger boardings/alightings.
- Furthermore, to help prevent sidewalk damage, the project sponsor should consider replacing existing ficus trees on Flower Street with a tree species that has a less destructive root system.
- Among the stops on southbound Flower Street most in need of improvements are the following:
  - a) Southbound Flower Street & Olympic Boulevard
  - b) Southbound Flower Street & Pico Boulevard
  - c) Southbound Flower Street & Washington Boulevard
- Lane configuration diagrams contained in the Draft EIR show that existing bus stops along Figueroa Street would be located in dedicated right turn pockets, which would create a potentially unsafe conflict in which cars could turn right in front of buses. Metro prefers farside stops and has worked with LADOT to avoid placing stops in right turn pockets when possible. To avoid this conflict, the following stops should be considered for relocation from nearside intersection locations to farside locations:
  - a) Northbound Figueroa Street & Venice Boulevard
  - b) Southbound Figueroa Street & Washington Boulevard
  - c) Northbound Figueroa Street & Jefferson Street
  - d) Figueroa Street & Adams Boulevard (both directions)
  - e) Figueroa Street & Martin Luther King Jr. Boulevard (both directions)
- Coliseum Commission concern for a more focused LADOT-organized vehicular traffic plan for special event-attendees unable to walk or unable to utilize Expo line light-rail system now available.

#### **Comments Summarized by Master Comment 22:**

Traffic exiting the new I-110 Metro Express Lanes will increase congestion. To address a freeway bottleneck where the express lanes end, metro and Caltrans are encouraging more traffic heading downtown to exit the freeway before Adams Boulevard and continue on Figueroa and other north south streets. Analysis of these impacts needs to be taken in to consideration.

#### **Comments Summarized by Master Comment 25:**

- The reduction of traffic capacity on Figueroa Street has a significant and material impact on overall traffic congestion facing attendees traveling for periodic special events at the Coliseum, LA Sports Arena.
- Impact to attendees at periodic special events at the Coliseum/Sports Arena. Associated extended congestion would impact local residents and businesses.
- Reduction in width of Bill Robertson Lane could restrict access/egress for Exposition Park parking lots (1, 2 and 3) west of the Coliseum.
- Coliseum Commission concern for a more focused LADOT-organized vehicular traffic plan for special event-attendees unable to walk or unable to utilize Expo line light-rail system now available.

- Letter attached to Goodmon e-mail – 2007 letter from Gloria Jeff re: Exposition Park Event Management Plan with Exposition Metro Line Operation.

#### **Comments Summarized by Master Comment 28:**

Reduction in width of Bill Robertson Lane could restrict access/egress for Exposition Park parking lots (1, 2 and 3) west of the Coliseum and lead to indirect impacts to nearby streets from ingress and egress impacts.

#### **Comments Summarized by Master Comment 31:**

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

#### **Comments Summarized by Master Comment 33:**

- The loss of on street parking in many built out communities would deprive those businesses of the only parking they have in close proximity to their businesses and could lead to conditions of BLIGHT on certain boulevards. Residential communities will suffer the intrusion of motorists looking for a parking space close to their parking destination and increase GREEN HOUSE gasses as motorists circle endlessly looking for a coveted parking spot. This situation is much worse than it should have been due to the flagrant “escheatment” of City special parking funds to fill the coffers of the City general fund.
- The parking impacts are significant too. These streets have significant amounts of commercial activity including many small stores and businesses. Most of these places do not have significant amounts of parking and parking in adjacent neighborhoods is heavily restricted particularly with permit only parking. This will hurt local commerce particularly the small retail businesses who are already struggling. This in turn will hurt the City’s coffers since so much of the City’s income is from sales tax. It will also result in the removal of lots of parking meters which the City’s depends on for income too.
- Loss of 92 on-street parking spaces within a BID district.
- Level of Service F indicated at all intersections within BID district during AM/PM peak periods. (See Master Comment 42)
- Impacts to businesses on Figueroa. Car dealerships (Shammas Group owns eight dealerships – six on Figueroa Boulevard including Felix Chevrolet the oldest dealership in LA – generated \$22 million in sales tax revenue in 2012, Jobs for nearly 1,000 employees. 500 customers per day to repair department). Car dealers rely on pass-by trips. Long delays at stop lights leading to a situation where customers will decide to go elsewhere. One approved \$20 million car dealership project will go on hold until the dealership knows what will happen to Figueroa Street.
- Reduction in width of Bill Robertson Lane could restrict access/egress for Exposition Park parking lots (1, 2 and 3) west of the Coliseum. Would lead to indirect impacts on local residents and businesses.
- Coliseum Commission concern for a more focused LADOT-organized vehicular traffic plan for special event-attendees unable to walk or unable to utilize Expo line light-rail system now available.

#### **Comments Summarized by Master Comment 34:**

- MTA has operational concerns regarding the removal of any travel lane where bus service operates. The prior removal of a travel lane on Main Street south of Pico Boulevard to install a bike lane has caused PM rush hour backups from Pico Boulevard to 17th Street. This in turn has resulted in bus delays and has increased Metro’s operating cost.

- Removal of travel lanes and turning movements will significantly slow bus travel. Quantitative Analysis was not conducted. Cost of bus: \$130 per bus per hour to operate. Slowing buses will increase costs. Metro has no additional money for operations. Bus service could be reduced.
- New bicycle lane has caused significant bus queuing on Main Street between 12<sup>th</sup> and 16<sup>th</sup> Streets increasing costs and making it harder for Metro to maintain on-time service. Impacts will be worse where travel lanes are reduced to one per direction.
- Several transit corridors with Metro bus service could be impacted by construction of the proposed project. Municipal bus service operators including LADOT, Foothill Transit, and City of Santa Clarita Transit may also be impacted and therefore should be included in construction outreach efforts.
- Description of Metro services contained in Section 4.5, Page 10 of the Draft EIR should include the following corrections:
  1. Metro light rail lines include the Blue, Exposition, Green and Gold Lines. Subway lines consist of the Red and Purple Lines (heavy rail, not light rail). The Orange and Silver Lines operate as Bus Rapid Transit (BRT).
- In the Downtown Los Angeles area, where the removal of travel lanes is proposed, Metro will when possible remove transit service from that affected street and move it to an adjacent street so that bus speeds and safety are not compromised by the bike lane.
- Figueroa Street: This street currently experiences high volumes of transit bus service and passengers along the proposed project location. Proposed project improvements along this segment of Figueroa Street will adversely impact bus operations. In an effort to mitigate these impacts, Metro will relocate southbound express bus services from Figueroa Street to parallel segments of Flower Street, and municipal bus operators may also move lines. Several bus stops on southbound Flower Street are in poor condition in terms of sidewalk quality and have inadequate lighting. In the event that service is relocated to southbound Flower Street, the project sponsor should consider lighting upgrades and/or new shelters at these stops to help ensure sufficient accommodation of increased bus service and bus stop passenger boardings/alightings.
- Furthermore, to help prevent sidewalk damage, the project sponsor should consider replacing existing ficus trees on Flower Street with a tree species that has a less destructive root system.
- Among the stops on southbound Flower Street most in need of improvements are the following:
  - a) Southbound Flower Street & Olympic Boulevard
  - b) Southbound Flower Street & Pico Boulevard
  - c) Southbound Flower Street & Washington Boulevard

#### **Comments Summarized by Master Comment 35:**

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



**Comments Summarized by Master Comment 36:**

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

**Comment Summarized by Master Comment 38:**

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

**Comment Included as Master Comment 40:**

- Do skaters and skate boarders count as bike lane users?

**Comments Summarized by Master Comment 41:**

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

**Comment Summarized by Master Comment 42:**

- Streets are currently over extended, removal of auto lanes will considerably slow traffic and bike lanes will do little to mitigate impacts.
- Level of Service F indicated at all intersections within BID district during AM/PM peak periods.