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FINAL ENVIRONMENTAL IMPACT REPORT

Figueroa Streetscape Project

ENV 2012-1470-EIR
State Clearinghouse No. 2012061092

Project Address: The Figueroa Streetscape Project is located within the public right-of-way through Downtown and South Los Angeles. It specifically includes S. Figueroa Street (from 7th Street to Martin Luther King Jr. Boulevard); 11th Street (from Broadway to Figueroa Street); Martin Luther King Jr. Boulevard (from Figueroa Street to Bill Robertson Lane); and Bill Robertson Lane (from Martin Luther King Jr. Boulevard to Exposition Boulevard).

Project Description: The Figueroa Streetscape Project (Proposed Project) consists of 4.5 miles of new bicycle facilities and streetscape improvements. The new bicycle facilities consists of three miles of a combination of new buffered bicycle lanes and cycle tracks along S. Figueroa Street, from 7th Street to Martin Luther King Jr. Boulevard; a one-way westbound buffered bicycle lane along six blocks of 11th Street, from Broadway to Figueroa Street; and new buffered bicycle lanes along Bill Robertson Lane between Martin Luther King Jr. Boulevard and Exposition Boulevard. The streetscape improvements include pedestrian scale street lighting, new street trees and planting areas, repaired and enhanced sidewalk paving at transit stops, enhanced crosswalk treatments, transit furniture, and public art.

LEAD AGENCY:
City of Los Angeles
Department of Transportation

PREPARED BY:
City of Los Angeles
Department of City Planning

August 2013

FIGUEROA STREETSCAPE PROJECT
FINAL ENVIRONMENTAL IMPACT REPORT

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1.0 INTRODUCTION

Purpose

This document is the Final Environmental Impact Report for the Figueroa Streetscape Project (Proposed Project). A Draft EIR was circulated for both the City of Los Angeles 2010 Bicycle Plan First Year of the First Five-Year Implementation Strategy and the Figueroa Streetscape Project Draft EIR. As discussed in the Draft EIR, AB 2245 (that allows a Statutory Exemption for "striped" bicycle lanes in urban areas, consistent with an adopted bicycle plan) was passed during preparation of the Draft EIR. The First Year of the First Five-Year Implementation Strategy consists of re-striping City streets with paint. However, the Proposed Project includes other streetscape elements, including a protected bicycle lane or cycle track (a protected bicycle lane or cycle track is identified as a bicycle path in the California Municipal Uniform Traffic Control Devices manual), that is demarcated with a rubber (removable) barrier. Because the law was not clear in indicating that such facilities are also covered by AB 2245 (rubber barriers will have the same impacts as paint stripes), this FEIR is being prepared to address comments on the Figueroa Streetscape Project.

Comments on the 2010 Bicycle Plan First Year of the First Five-Year Implementation Strategy are addressed in separate staff reports for each of the four hearing areas (Northeast, Central, Valley and West LA).

This document together with the Draft EIR and its technical appendices comprise the Final EIR for the Figueroa Streetscape Project (Proposed Project). The document has been prepared by the City of Los Angeles pursuant to the California Environmental Quality Act ("CEQA") Guidelines Section 15088 et seq.

A Final EIR is required under Section 15132 of the CEQA Guidelines to include: the Draft EIR or a revised version; 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; the responses of the Lead Agency to significant environmental issues raised by those comments in the review and consultation process; and any other relevant information added by the Lead Agency (including minor changes to the EIR). The Mitigation Monitoring and Reporting Program is a separate document that accompanies the Final EIR.

The evaluation and response to public comments is an important part of the CEQA process as it allows the following: (1) the opportunity to review and comment on the methods of analysis contained within the Draft EIR; (2) the ability to detect any omissions which may have occurred during preparation of the Draft EIR; (3) the ability to check for accuracy of the analysis contained within the Draft EIR; (4) the ability to share expertise; and (5) the ability to discover public concerns.

Process

As defined by Section 15050 of the CEQA Guidelines, the City of Los Angeles Department of Transportation (LADOT) is the Lead Agency. However, the Department of City Planning provided support to LADOT in compliance with CEQA and has prepared both the Draft and Final EIR for this project. A Notice of Preparation (NOP) was prepared and circulated for a period of 30 days starting June 26, 2012.

The Draft EIR was prepared and circulated for a period of 45 days, beginning on January 17, 2013, and ending on March 4, 2013. Comments on the Draft EIR regarding the Proposed Project were received during the comment period, and those comments are set forth and are responded to in this Final EIR.

This Final EIR will be submitted to the LADOT General Manager for action to certify the Final EIR. The General Manager will review the Final EIR, together with the Proposed Project and will decide whether to certify the Final EIR and approve the Proposed Project. The certification of the Final EIR is appealable to the City Council during a 15-day appeal period.

Changes to the Figueroa Streetscape Project Since Publication of the Draft EIR

In response to some of the concerns raised during the comment period, LADOT has revised the Proposed Project since the circulation of the Draft EIR. The Proposed Project, as revised, would continue to reduce traffic lanes in several segments along S. Figueroa Street, though to a lesser degree than originally proposed and evaluated in the Draft EIR. The Proposed Project would eliminate one southbound mixed-flow travel lane and the peak-period northbound lane along Figueroa Street between Martin Luther King Jr. Boulevard and Exposition Boulevard. The revised configuration in this segment would be two north-bound mixed-flow travel lanes, two south-bound mixed-flow travel lanes, a center left-turn lane, and a bicycle lane in each direction.

Between Exposition Boulevard and Adams Boulevard, the Proposed Project would eliminate the peak-period north-bound lane and one full-time north-bound mixed-flow travel lane. Between Exposition Boulevard and 30th Street, the Proposed Project would eliminate the peak-period south-bound lane. The revised configuration between Exposition Boulevard and Adams Boulevard will be two north-bound mixed-flow travel lanes, two south-bound mixed-flow travel lanes, and a center left-turn lane. Cycle tracks are proposed from Exposition Boulevard to 21st Street in each direction.

Between Adams Boulevard and Venice Boulevard, the peak-period southbound lane and one northbound mixed-flow travel lane would be eliminated. The revised configuration in this segment would be two north-bound mixed-flow travel lanes, one north-bound peak-period bus lane (mixed-flow off-peak), and one south-bound mixed-flow travel lane, and a center left-turn lane. Between Venice Boulevard and 8th Street, one northbound mixed-flow travel lane would be eliminated. From Venice Boulevard to Olympic Boulevard, there will be two full-time mixed-flow travel lanes in the southbound direction and two full-time mixed-flow travel lanes, one peak-period bus-only lane (mixed-flow off-peak) in the northbound direction, and a center left-turn lane. Buffered bicycle lanes are currently proposed between 21st Street and 11th Street in each direction.

From Olympic Boulevard to 9th Street there will be a two full-time north-bound mixed-flow travel lanes and a peak-period bus-only lane, and between 8th Street and 9th Street an additional peak-period mixed-flow lane on the west side of the roadway, which becomes a full-time lane just north of 8th Street. A cycle track is proposed from 11th Street to 7th Street in the northbound direction only.

Contents of the Final EIR

As discussed above, the primary intent of the Final EIR is to provide a forum to air and address comments pertaining to the analysis contained within the Draft EIR with respect to the Figueroa Streetscape Project. Pursuant to Section 15088 of the CEQA Guidelines, the City of Los Angeles has reviewed and addressed all comments received on the Draft EIR with respect to the Figueroa Streetscape Project. Included within the Final EIR are written comments that were submitted during the public review period.

In order to adequately address the comments provided by interested agencies and the public in an organized manner, this Final EIR has been prepared in four parts. A description of each part plus the separate Mitigation Monitoring and Reporting Plan is as follows:

- Chapter 1 provides a brief introduction to the Final EIR and its contents.

- Chapter 2 provides a list of commenting agencies, organizations and individuals as well as copies of each comment letter received. A public hearing was held on February 14, 2013. No technical comments on the adequacy of the EIR were raised at that hearing.

- Chapter 3 provides responses to written comments made by both the public agencies and interested parties. Some of the comment letters received on the Draft EIR as well as comments at the public

hearing also provided comments on the project (not the anticipated environmental impacts). These project-related comments, including expressions of support or opposition to the project, require no response in the EIR process, but the opinions expressed by each commenter will be forwarded to the LADOT General Manager for his consideration in making a decision on the project.

- Chapter 4 provides a list of corrections and additions to the Draft EIR (including technical corrections to analyses for both the Figueroa Streetscape Project and projects in the First Year of the First Five-Year Implementation Strategy).

- The Mitigation Monitoring and Reporting Program ("MMRP") prepared in compliance with the requirements of Section 21081.6 of the California Public Resources Code and Section 15091(d) and 15097 of the CEQA Guidelines is prepared as a separate document to accompany the Final EIR.

Review and Certification of the Final SEIR

Consistent with state law (Public Resources Code 21092.5), responses to agency comments are being forwarded to each commenting agency more than 10 days prior to the anticipated certification date. At the same time, responses are being distributed to all commenters who provided an address.

The Final EIR is available for public review at the following locations:

1) Central Library - 630 W. 5th Street
2) Jefferson Branch Library, 2211 W. Jefferson Boulevard

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 Dave Somers at David.Somers@lacity.org to purchase one.

2.0 LIST OF COMMENTERS

List of Commenting Agencies, Organizations and Individuals

Table 2-1 lists all the letters received on the Draft EIR regarding general CEQA topics and the Proposed Figueroa Streetscape Project. Copies of these comment letters can be found in Appendix B. **Table 2-2** lists commenters at the Central Area public meeting (held in Downtown Los Angeles at the Caltrans Building, February 14, 2013).

Section 3 of this EIR summarizes these comments in to 40 topical "Master" Comments that are addressed in Master Responses. In additions examples of specific comments that are addressed by the Master Response are cited and in some cased additional specific responses are presented and included in Appendix A.

TABLE 2-1: COMMENT LETTERS

No.	Organization	Commenter Name	Comment Date
FIGUEROA STREETSCAPE (PROPOSED PROJECT) COMMENTS			
1	Metropolitan Transportation Authority	Scott Hartwell, CEQA Review Coordinator, Long Range Planning	March 4, 2013
2	California Department of Transportation (Caltrans)	George Chammas, Office of Traffic Investigation	February 13, 2013
3	Automobile Club of Southern California	Alice Bisno, Senior Vice President Public Affairs	March 1, 2013
4	Figueroa Corridor Partnership Business Improvement District (BID)	Steve Gibson, Executive Director	February 14, 2013
5a	The Shammas Group	Darryl Holter, CEO	February 14, 2013
5b	The Shammas Group	Darryl Holter, CEO	March 4, 2013
6	Los Angeles Memorial Coliseum Commission	John Sandbrook, Interim General Manager	March 4, 2013
7	Community Health Councils, Inc. (CHC)	Lark Galloway-Gilliam, Executive Director	February 14, 2013
8	T.R.U.S.T. South LA	Tafarai Bayne	February 10, 2013
9	Southeast Asian Community Alliance – Los Angeles	Sissy Trinh, Executive Director	February 5, 2013
10		Niall Huffman	February 21, 2013
11		Marcus Kaye	February 19, 2013
12		Christopher Rallo	February 15, 2013
13		Mike Windisch	March 4, 2013
14		Kevin Wu	February 17, 2013
15		Jeremy Barofsky	March 3, 2013
16		Michael Shifflett	February 28, 2013
GENERAL COMMENTS			
17	State of California Governor's Office of Planning and Research Clearinghouse	Scott Morgan, Director	March 5, 2013
18	Native American Heritage Commission	Dave Singleton, Program Analyst	January 23, 2013
19	Los Angeles County Bicycle Coalition	Eric Bruins, Planning and policy Director	March 4, 2013

TABLE 2-1: COMMENT LETTERS			
No.	**Organization**	**Commenter Name**	**Comment Date**
20		Jeffrey M. Jacobberger	
21	Fix the City, Inc.	James O'Sullivan	March 1, 2013
22		Stewart Chesler	March 2, 2013
23	Los Angeles County Bicycle Coalition	Alexander Friedman	February 23, 2013
24		Darius Azari	March 3, 2013
25	Strumwasser & Woocher LLP	Beverly G. Palmer, Associate	March 15, 2013
26		Nathan Carballo	March 4, 2013
27		Cotty Chubb	February 28, 2013
28		Mark Cosby	February 28, 2013
29		Victor Cuevas	March 4, 2013
30		Bryce Edmonds	February 23, 2013
31		Richard Foos	February 28, 2013
32		Frankie Fridkin	March 1, 2013
33		Melissa Fujimoto	February 28, 2013
34		Ben Grangereau	February 28, 2013
35		Dennis Hindman	February 23, 2013; March 4, 2013
36		Tommy Holcomb	February 27, 2013
37		Matt Irwin	March 4, 2013
38		Joshua Cohen	March 1, 2013
39		Jonathan Fox	March 3, 2013
40		Sue LaVaccare	March 4, 2013
41		Aaron Lawrence	March 1, 2013
42		Susannah Lowber	March 1, 2013
43		Alex MikoLevine	January 22, 2013
44		Matthew Mooney	March 4, 2013
45		Alexei Nowak	March 4, 2013
46		Arsenio Nunez	February 28, 2013
47		Pauline Martinez	March 1, 2013
48		Ricardo Gutierrez	January 18, 2013; January 23, 2013
49		Sarah Evans	February 27, 2013
50		Dan Curnow	March 4, 2013
51		Julia Salinas	February 12, 2013
52		Gwenaëlle Gobé	March 4, 2013
53		Lawrence Sanchez	March 4, 2013
54		Avraham Shamoil	February 27, 2013
55		Aaron Sosnick	March 2, 2013
56		Jennifer Wright	February 22, 2013

TABLE 2-2: FEBRUARY 14, 2013 CENTRAL AREA PUBLIC HEARING COMMENTERS					
No.	**Commenter**	**For Proposal**	**Against Proposal**	**General Comment**	**No Comment**
1	Colin Bobart	X			
2	Alex Bartrosouf	X			
3	Alex Rixey	X			
4	Niall Huffman	X			
5	Edward Belden	X			
6	Carol Feucht	X			
7	Jennifer A. Gill			X	
8	Nathan Holmes	X			
9	Alex T. Campell			X	
10	James Bledsoe			X	
11	Ryan Jones	X			
12	Robin Adams	X			
13	Jonathan Truong	X			
14	Kathleen Smith	X			
15	Michael MacDonald	X			
16	Martin Lopez-Lu	X			
17	Nicolas Bartolone			X	
18	Bradley Cleveland	X			
19	Jeff Jacobberger	X		X	
20	Greg Wittman	X			
21	Shuntain Thomas	X			
22	Susanza Schick			X	
23	Valle Gulyan	X			
23	Tafarai Bayne				X
25	Simon Hartigan	X			
26	Berta Avila	X			
27	Denis Cagna	X		X	
28	Allison Mannos				
29	Reynaldo H. Escobar	X			
30	John Kerr	X			
31	Paul Des Marais	X			
32	Ian Lister	X			
33	Wesley High	X			
34	Katherine McKenny				X
35	Nathan Griffin				X
36	Jennifer Wright	X			
37	Kenny Easwaran	X			
38	Yolanda Davis-Overstreet	X		X	
39	Gilbert Gutierrez Jr.				X
40	Ryan Johnson				X
41	Andy Rodriguez	X			
42	Dana Fisher	X			
43	Ricardo Gutierrez	X			
44	Cullen McCormick	X			
	TOTAL	**33**	**0**	**8**	**5**

Copies of these comment letters can be found in Appendix A. **Table 2-2** lists commenters at the Central Area public meeting (held in Downtown Los Angeles at the Caltrans Building, February 14, 2013).

Section 3 of this EIR summarizes these comments in to 40 topical "Master" Comments that are addressed in Master Responses. In additions examples of specific comments that are addressed by the Master Response are cited and in some cased additional specific responses are presented.

3.0 SUMMARY OF COMMENTS AND RESPONSES

B. SUMMARY OF COMMENTS AND RESPONSES

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

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

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

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

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

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

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

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

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

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

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

Master Response 2: The City complied with notification requirements of Section 21080.20.5 (b)(2) of the Public Resource Code (PRC) through publishing a notice in a newspaper of general circulation. The Notice of Availability and Public Hearing was published in the Los Angeles Times on January 17, 2013. In addition

to the legal requirements of the PRC, notification and outreach process for the Proposed Project also included a variety of lists used to distribute notices of the Hearings and Draft EIR availability. The distribution included neighborhood councils in affected areas, a list of public agencies, email contacts of interested parties whom submitted an inquiry by email on the 2010 Bicycle Plan and implementation process, and organizations that submitted letters during the scoping process.

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

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

In addition, the Proposed Project was part of an extensive public design process formerly led by a project team, working under the direction of the Community Redevelopment Agency of the City of Los Angeles (CRA/LA), that included Troller Mayer Associates, Meléndrez, and Gehl Architects. The outreach included two rounds of formal public meetings, along with numerous smaller meetings with groups of stakeholders.[1] Much of the project design is the direct outcome of this process. LADOT will be incorporating additional suggestions on the Proposed Project, as determined by sound engineering judgment, into the final design on a case by case basis.

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

Master Response 3: This comment applies to the bicycle lanes included in the First Year of the Five Year Implementation Strategy. As stated in the Introduction, bicycle lanes included in the First Year of the Five Year Implementation Strategy that were not part of the Proposed Project are eligible for a Statutory Exemption from CEQA pursuant to PRC Section 21080.20.5, as discussed further below. However, since the Proposed Project includes cycle tracks and other streetscape elements that are beyond the eligibility requirements of restriping as described under Section PRC Section 21080.20.5, a Final EIR is being prepared. The following discussion explains the relationship between Section 891.2 of the Streets and Highways Code, and the 2010 Bicycle Plan implementation process.

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

The comment alleges that the implementation of bicycle lanes identified in the 2010 Bicycle Plan are not eligible for the Exemption under AB 2245 because: implementation of the 2010 Bicycle Plan requires a General Plan Amendment that includes a major revision to the Circulation Element, the eligibility

[1] MyFigueroa Project Website. http://www.myfigueroa.com/history Accessed July 15, 2013

requirements of PRC Section 2180.20.5 were not appropriately satisfied and the 2010 Bicycle Plan itself does not comply with Section 891.2 of the Streets and Highways Code.

The City complied with the provisions of PRC Section 21080.20.5 by assessing the traffic and safety assessments of the proposed bicycle lanes included in the First Year of the Five Year Implementation Strategy, and including the analysis in a Draft EIR. The Draft EIR was made available on January 17, 2013, nearly one month in advance of the Public Hearing of the Proposed Project held on February 13, 2013. See Master Response 2 for notification of availability of Draft EIR and the Public Hearing.

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

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

The commentor states the need to complete a Final EIR for the proposed bicycle lanes included in the First Year of the Five Year Implementation Strategy, but fails to demonstrate why the completion of a Final EIR is necessary.

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

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

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

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

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

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

The Proposed Project includes installing buffered bicycle lanes and cycle tracks that would result in the loss of a number of travel lanes. The loss of travel lanes are necessary to provide a curb lane wide enough to accommodate bicycle traffic along designated bikeways, and for consistency with the policies of the Bicycle Plan and the City's General Plan Framework. The buffered bicycle lanes and cycle tracks are included to provide additional safety for bicyclists and conform to standards in the Technical Design Handbook, as well as the California Manual of Uniform Traffic Control Devices (MUTCD).

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

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

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

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

2245, and can be cleared through subsequent traffic and safety assessments provided they meet the requirements of AB 2245.

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

While the Draft EIR determined that land use impacts would be less than significant, **Mitigation Measure LU1** was identified to address adverse land use impacts resulting from the loss of parking.

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

Master Response 7: The commenter seems to confuse the proposed action under review, which is an administrative action (implementation of the 2010 Bicycle Plan), and not a legislative action (amendment to the 2010 Bicycle Plan). The Proposed Project implements the 2010 Bicycle Plan. The Proposed Project is included in the 2010 Bicycle Plan as part of the Backbone Bikeways Network. The 2010 Bicycle Plan was adopted by the City Council March 1st, 2011 by resolution. Implementation of the 2010 Bicycle Plan is an administrative decision by LADOT, and a revision of the Circulation Element (a legislative action) is not required to implement the 2010 Bicycle Plan. See Master Response 4 for the environmental clearance process of the 2010 Bicycle Plan.

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

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

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

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

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

Bicycle Plan does not make changes to any community plans. However, as the community plans are updated they will incorporate the bikeway system identified in the 2010 Bicycle Plan, including the Proposed Project.

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

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

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

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

Master Comment 10: Prefer alternative that maintains more or all of the existing travel lanes along S. Figueroa Street. Other commenters in the Draft EIR identified a number of alternative streets than those proposed in the Five Year Implementation Strategy and other programs to promote bicycling in the City, in lieu of installing bicycle lanes.

Master Response 10: The California Department of Transportation (Caltrans) Office of Traffic Investigation stated that the Draft EIR failed to include adequate mitigation measures or present feasible alternatives that would reduce impacts on the regional roadway system, however, the comment does not provide specific mitigation measures or alterative that would reduce the impacts.

The Figueroa Corridor Partnership Business Improvement District (BID) suggested an alternative that maintains two northbound and two southbound lanes (not including turn pockets) on S. Figueroa Street, between Martin Luther King Boulevard and Venice Boulevard, and maintains all on-street parking. Another comment opposed any proposal that limits the number of vehicular lanes to just one north- and southbound lane, or that would result in any increase in travel delay. The Proposed Project has been revised since the publication of the Draft EIR in response to the comment. The Proposed Project, as revised, preserves an additional southbound travel lane between Exposition Boulevard and W. Adams Boulevard, and an additional northbound travel lane between W. Adams Boulevard and Venice Boulevard. However, the revisions required the removal of more on-street parking spaces from what was evaluated in the Draft EIR along this segment. The installation of bicycle lanes, while preserving all travel lanes and on-street parking, and thereby avoiding increases in travel delay, as suggested by the comment, is not possible given physical constraints of the road width. See "Changes to the Figueroa Streetscape Project Since Publication of the Draft EIR" in the Introduction for a full description of the Proposed Project as revised. The revised analysis is presented in Corrections and Additions. Impacts are substantially reduced. Also see Specific Response 8.

Comments were submitted on the Draft EIR that requested the proposed bicycle lanes included in the Five Year Implementation Strategy be installed on alternative streets. Some of the streets that were offered as alternatives to the proposed bicycle lanes in the Five Year Implementation Strategy lack feasibility because they do not provide a complete connection along a corridor as compared to those included in the Draft EIR, while other proposed alternatives do not connect bicycle riders to their preferred destinations. Some of the proposed alternative streets also lack the necessary width to install bicycle lanes while also maintaining one travel lane in each direction and on-street parking. Some of the comments suggested programs that promote car-pooling, transit, and greater reliance on sidewalks for bicycling, as a means to fulfill some of the project objectives, instead of installing bicycle lanes. Car pooling and changes to transit are separate projects that are simultaneously being pursued in the City; they are not alternatives to the bicycle lanes proposed. Use of

sidewalks by bicycles - though legal in the City of Los Angeles – is not encouraged; studies show that bicycle riding on sidewalks presents more risks to all users, as compared to riding a bicycle in the street. The City is also encouraging increased pedestrian activity and therefor separating bicycles from pedestrians is beneficial.

Some of the comments sought greater investment in bicycle facilities such as cycle ways and cycle tracks in other parts of the City. Elevated cycleways throughout the system are currently infeasible, in the short-term, due to insufficient funding. An elevated bicycle facility would likely lack the added safety benefits achieved by reducing the number of travel lanes and effectively lowering the design speed. The Department of City Planning is currently undergoing an update to the Mobility Element that includes the identification of a low-stress bicycle network throughout the City. This will likely include the proposal for more cycle tracks as included in the Proposed Project. The Proposed Project will serve as an important demonstration of the increased benefits of cycle tracks, since it is the first example in the City, and should help to encourage broader implementation.

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

Master Response 11: The monetary value of various injuries, by type of collisions, were included as a footnote 28 on Page 4.5-33 of the Draft EIR, The information was included to demonstrate the safety benefits, in monetary terms, in reducing the amount of bicycle and pedestrian related collisions if bicycle lanes were installed. A response to inquiry with the Transportation Injury Mapping System (TIMS) staff verified that the original monetary values were underreported.[2] The follow text corrects what was provided in the Draft EIR.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The comment refers to a Bikes Belong grant supported study conducted by the Los Angeles County Bicycle Coalition (LACBC) that evaluated the economic impacts of a similar installation of bicycle lanes along York Boulevard that required a removal of a travel lane (road-diet).[3] While this type of evaluation was not part of a formal City program, Policy 3.2.6 of the 2010 Bicycle Plan seeks to establish a means to measure the economic impact on commercial corridors resulting in bikeway improvements. However, implementation of

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

this program is contingent on program funding. A part of such program could include collecting data on business taxes and property sales records for the given period to monitor patterns in response to bikeway improvements.

See Master Response 28 related to neighborhood intrusion impacts.

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

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

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

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

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

Street	***Bike/Ped Collision Injuries Total 10 Years (2001-2010)***	***Bike/Ped Collision Fatalities 10 Years (2001-2010)***	***Route Miles***	***Collision Injury/Fatality rate per mile per year***
S. Figueroa St.	*100*	*0*	*3*	*3.33*
11th St.	*1*	*0*	*0.45*	*0.22*
Menlo Ave./Bill Robertson Ln.	*0*	*0*	*0.5*	*0.00*

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

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

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

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

Master Response 20: The Proposed Project is funded by a Proposition 1C grant. Proposition 1C is part of the State's Strategic Growth Plan that invests in housing and infrastructure projects that support infill development. Funding for the proposed bicycle lanes in the Five year Implementation Strategy is funded by Measure R local return.

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

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

Mitigation Measure T3 has been revised to address potential impacts of the Proposed Project related to special event access during games at the Los Angeles Memorial Coliseum and Sports Arena. See Master Response 25 related to Special Events and Master Response 28 related to traffic diversion.

In response to the increase delay as a result of the Proposed Project, Metro will consider relocating southbound express bus services from Figueroa Street to parallel segments of Flower Street, and expresses the necessity of bus stop and streetscape improvement along Flower Street as further mitigation. Bus stop and streetscape improvement along Flower Street is beyond the scope of the Proposed Project, however, this suggestion shall be forwarded to LADOT for consideration for future improvements subject to available funding.

Metro also states concern with placement of bus stops in dedicated right-turn pockets along S. Figueroa Street that would create a potentially unsafe conflict in which cars could turn right in front of buses. Metro states a preference for placing bus stops at the far-side intersection locations. It is unclear where any materials portray bus stop locations in right-turn pockets as part of the Proposed Project. The placement of bus stops in far-side intersection locations is part of the Proposed Project.

Master Comment 22: The cumulative analysis is inadequate. The analysis does not include additional traffic that results from the new I-110 Express Lanes.

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

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

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

A comment indicated that congestion on S. Figueroa Street would be aggravated by northbound drivers exiting the Interstate-110 (I-110) at W. Adams Boulevard to avoid bottlenecks where the express lanes end. LADOT is coordinating the review of the I-110 (Harbor Freeway/Transitway) High-Occupancy Toll (HOT) Lane Project with Caltrans to provide feedback as it relates to the Proposed Project. The I-110 HOT Lanes is currently under evaluation in the demonstration stage, which will expire with one year of the project

initiation date. The demonstration was initiated on November 10, 2012. The Draft EIR/Environmental Assessment (EA) prepared for the demonstration phase did not describe any additional congestion on S. Figueroa Street due to traffic diverting from the I-110 as a result of the demonstration program. As stated on Page 32 of the EIR/EA, Metro shall prepare a report to the California state legislature at the end of the demonstration program, and will have to consider potential impacts on City streets including S. Figueroa Street.

In addition, the probability of drivers choosing S. Figueroa Street as an alternative route is influenced by the level of congestion relative to the I-110. The Proposed Project will be reducing the capacity of S. Figueroa Street to continue to facilitate regional traffic flow, as shown by the predicted significant travel delay at 9 intersections, for the purposes of facilitating a greater amount of pedestrian and bicycle trips, as well as offering an important regional bicycle connection between USC and Downtown. There is a low probability of northbound I-110 traffic to divert to S. Figueroa Street, if the future travel delay is realized as is predicted in this EIR. This is especially true given the level of access that commuters have to real time traffic data. The comment does not provide facts, or evidence based on facts that the I-110 HOT Lane Project would substantially increase travel delay over what was evaluated in the EIR.

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

Master Response 23: Performing a one-day count conforms to the LADOT Traffic Study Policies and Procedures and is representative of a typical day. The LADOT Traffic Study Policies and Procedures establish that all traffic counts should generally be taken on Tuesdays through Thursdays during non-Summer months, when local schools are in session, on days of good weather, and should avoid being taken on weeks with a holiday.[4] Minor fluctuations occur from day to day and over seasons. One day counts are adequate for the analysis.

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

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

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

Master Response 25: Background traffic during special events, etc. is typically lower than the background traffic during the peak period, and past traffic counts at these locations have confirmed this. Even with event traffic, overall maximum intersection delay occurs during the peak period (3-6 PM). Traffic in the immediate vicinity of special events may be worse outside peak hours, but is not easily captured because of inherent variability in types of events. As stated on Page 4.5-27 of the Draft EIR, the Proposed Project would aggravate traffic congestion before and after games and events held at the Los Angeles Convention Center, and games at the Los Angeles Memorial Coliseum and Sports Arena. The Los Angeles Memorial Coliseum Commission stated a concern that the reduction in travel capacity of Bill Robertson Lane would restrict access to Exposition Park parking lots during special events and games. The Proposed Project would continue to maintain one travel lane in each reduction, as well as the existing on-street parking on the west

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

side of Bill Robertson. However, **Mitigation Measure T3** has been revised so that the Special Event Section of LADOT shall revise the traffic management program during special events and games accordingly to maintain adequate access to parking lots along Bill Robertson Lane.

In addition, alternative transportation services will continue to be provided to reduce game day traffic, such as the Expo Line, and USC's free shuttle services.

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

Master Response 26: Emergency vehicles are able to use sirens to move traffic out of the path of travel. Buffered bicycle lanes, and the peak-period bus lane, could also provide sufficient space for cars to pull over into in order to yield right of way to emergency response vehicles. In general, emergency vehicles are also able to use center left turn lanes. The cycle track includes a new curb adjacent to the parking lane that is fully mountable and traversable for emergency vehicles to cross if necessary. Emergency vehicles will continue to have access along the portions of the Proposed Project, as revised, that include a cycle track (between Exposition Boulevard to 21st Street, and 11th Street and 7th Street). Substantial impacts to emergency services are not anticipated. However, **Mitigation Measure T6** Los Angeles Fire Department (LAFD) shall review final design of the Proposed Project to ensure emergency response access is adequately maintained along S. Figueroa Street.

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

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

The Proposed Project is not expected to increase left turn movement above current conditions.

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

Master Response 28: Comments were submitted on the Draft EIR that raised concerns over diversion of traffic to parallel residential streets. However, these comments related to other proposed bicycle lanes in the Five Year Implementation Strategy where diversion to residential streets, as a result of increased congestion, was seen as a potential impact. For the Proposed Project, higher peak-period traffic volumes could divert to the I-110, or one of the parallel arterial streets. Trip diversion was addressed on Page 4.5-26 of the Draft EIR. The Draft EIR stated that some trip diversion could occur to avoid increased travel delays along S. Figueroa Street, potentially resulting in significant impacts along parallel streets. However, since there are several streets that can serve the same trip purpose as S. Figueroa Street, a more precise impact evaluation of trip diversion is speculative.

Streets that parallel S. Figueroa Street are major arterials dominantly comprised of urban commercial and institutional uses. Given the urban character of the project area, there are no adjacent residential streets that would experience higher traffic volumes. While some degree of trip diversion may occur, this is not expected to result in a significant impact to neighborhood streets. As such, the traffic calming measures proposed in the Draft EIR as **Mitigation Measure T3** would not apply to the Proposed Project. See Corrections and Additions.

In addition, the analysis of traffic impacts along S. Figueroa Street conservatively assumes that all existing traffic would remain along S. Figueroa Street after the street striping reconfiguration. Some trip diversion

along parallel streets would reduce the travel delay increases along S. Figueroa Street from what was reported in the Draft EIR.

Furthermore, in response to some of the concerns regarding travel delay, LADOT has revised the Proposed Project since the circulation of the Draft EIR. The Proposed Project, as revised, would continue to reduce traffic lanes in several segments along S. Figueroa Street, though to a lesser degree than originally proposed and evaluated in the Draft EIR. As such, impacts from trip diversion would be less as a result, as compared to the Proposed Project as evaluated in the Draft EIR.

The Los Angeles Memorial Coliseum Commission stated a concern that the reduction in travel capacity of Bill Robertson Lane would restrict access to Exposition Park parking lots during USC games, and potentially lead to indirect impacts to nearby streets. **Mitigation Measure T3** has been revised so that the Special Event Section of LADOT shall revise the traffic management program during special events and games accordingly to maintain adequate access to parking lots along Bill Robertson Lane. This would reduce trip diversion during special events. See Master Response 25.

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

Master Response 29: Protected bicycle lanes, or cycle tracks, is one method of striping roadways to indicate where bicycles are allowed. Nonetheless, in part to address the lack of clarity in the regulation, a Final EIR is being prepared for the Proposed Project.

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

Master Response 30: The use of bicycle lanes is anticipated to increase as greater connectivity is achieved. The utility of any one bicycle segment is directly related to how it connects to a greater system, how it facilitates trip to desired destinations, and the level of comfort experienced along the entire trip length. As the bicycle network is expanded, to connect people to desired destinations and increase overall perceptions of bicycle safety and comfort, it is anticipated that bicycle use will grow substantially. According to SCAG estimates, bicycling could amount to as much as 16 percent of all trips throughout the region by 2035 based on current increases in projected ridership trends.[5] However, SCAG anticipates conservatively that even if bicycle ridership is not sustained at the current levels of growth, bicycle trips could still represent at least 8 percent of all trips throughout the region in 2035.[6] The percentage could exceed 8 percent contingent on the comprehensiveness of the bicycle network, services and facilities, and the opportunity cost to other travel modes such as gas prices.

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

Master Response 31: For purposes of identifying a conservative estimate of vehicle travel delay, the Draft EIR assumes that vehicle traffic volumes on the various affected roadway segments will remain unchanged even where there would be a reduction in travel lanes and roadway to accommodate bicycle lanes. The pollutant most affected by traffic delay is carbon monoxide (CO). Typically, CO emissions rate increase as vehicle speed decreases between the range of 10 miles per hour (mph) and 25 mph, and increases further as vehicle speed decreases to 2.5 mph idling speed. CO emissions rates increase as vehicle speed increase above 25 miles per hour.[7] Where capacity is reduced there could be an incremental reduction in vehicle speeds along the affected street segments and there could be a localized incremental increase in CO emissions. In

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

some cases, where capacity is reduced, the number of vehicles passing through an intersection during the peak hour could decrease, which could lead to the peak period being extended, as well as modest increases in CO emissions. Localized concentrations of CO could occur where large amounts of traffic operate under heavily congested conditions if vehicles are left idling for a substantial period of time. South Figueroa Street is already congested and operates at or near capacity during peak hour periods, and any incremental change in traffic volumes or vehicle idling emissions would not be significant.

Other factors taken into account in the analysis are as follows: 1) the Proposed Project would affect capacity of approximately 0.08 percent of the roadway miles in the City of Los Angeles (5.2 miles out of 6,500), and 2) the existing ambient CO levels are extremely low within the Los Angeles Air Basin. The one-hour concentration is typically 3 ppm and the 8-hour concentration is typically 2 ppm according to monitoring data for the SCAQMD monitoring station located in downtown Los Angeles. The Air Basin is designated a maintenance area for CO which means that both State and federal air quality standards are satisfied. There are no air quality CO hot spots within the basin as a whole, or the City of Los Angeles in particular.

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 over an 8-hour period. Because of the low ambient CO condition, even where average street segment speeds could be reduced to almost zero, the resulting CO emissions would only increase by two times. Under the most extreme 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.

The Proposed Project would result in a net decrease in a maximum of 160 parking spaces. It is speculative to conclude about the degree of excess motor vehicle circulation that could occur due to the loss of these spaces. In general, as people become accustomed to available levels of parking drivers plan in advance where to park. In the impacted areas there are generally convenient parking alternatives, and it is anticipated that drivers would park on nearby streets, in off-street lots/parking structures, or slightly further away from their destination and walk. As a result, substantial circling for parking is not anticipated and the loss of parking associated with the proposed project would not result in a significant increase in vehicle miles traveled and associated increase in emissions (including greenhouse gases). In addition, potential increases in emissions (including greenhouse gases) would be partially offset by increased bicycle ridership that would reduce regional vehicle miles traveled and associated emissions. See Master Response 33 for a more detailed discussion on parking impacts.

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

Master Response 32: The impacts of converting vehicle trips to bicycle trips is not fully taken in to account in the traffic modeling. The SCAG modeling projections use conservative (i.e. low) assumptions regarding the number of trips anticipated to occur via bicycle (an average of 8% region-wide in 2035[8], with an upper limit of 2/3 of all trips under 3 miles and ½ of all trips under 5 miles occurring by bicycle).[9] Similarly, changes in behavior that are anticipated to occur over time (e.g. increased telecommuting, people living closer to their jobs, changing routes due to congestion) are not fully taken in to account in the SCAG future year modeling. Because changes in mode share and behaviors are uncertain, LADOT takes a conservative approach to modeling. The analysis is considered conservative (worst case) because it does not assume that changes that have occurred in other cities will happen in Los Angeles. The City is currently evaluating different methods for measuring impacts to all modes of travel as a part of the Mobility Element Update.

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

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

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

While the Draft EIR evaluated the impact of delays in the context of traffic, the Draft EIR did not analyze the impact of delays on retail sales and property values. As described on page 4.5-27 of the Draft EIR, parking deficits are considered to be social effects unless they lead to blight and physical impacts. In accordance with CEQA Guidelines Section 15131, economic effects of a project need not be included in an EIR, and the economic effects of a project should not be treated as a significant effect on the environment. For this reason, an analysis of the economic effects of the proposed project was not included in the Draft EIR.

The Proposed Project would result in a net decrease in a maximum of 160 parking spaces. This is an additional reduction of 30 spaces than were evaluated in the Draft EIR as a result of modifications made to the Proposed Project. It is speculative to conclude about the impacts to businesses along S. Figueroa Street that could occur due to the loss of these spaces. The removal of on-street parking tends to have greater impacts to businesses reliant on pass-by trips. The retail businesses that would likely be more reliant on pass by trips are located on the southern end of the project area, and have high access to pedestrian foot traffic due to the close proximity to USC. They are also located within newer constructed buildings that provide on-site parking, as opposed to older buildings that pre-date the City's off-street parking requirements. The inclusion of cycle tracks and buffered bicycle lanes also provides a greater degree of non-motorized access in proximity to a large student population, which would further off-set decreased availability of on-street parking. Conversely, the elimination of on-street parking would likely not deter many potential customers of some regional attracting businesses along the corridor, considering the continued availability of a mix of off-street parking supply and nearby on-street parking sufficient to compensate for the spaces reduced due to the Proposed Project. However, The Draft EIR identifies **Mitigation Measure LU1** that encourages that the City identify feasible parking strategies in locations where parking supply for commercial uses consists only of on-street parking that would be removed by the Proposed Project.

The Proposed Project is intended to facilitate increased bicycle trips as a percentage of total trips and encourage multi-modal travel. With implementation of the Proposed Project, bicycle trips are anticipated to increase as a percentage of total trips resulting in a reduction in vehicle trips, a stated objective of the Proposed Project. This encouragement in multi-modal travel along the corridor would also increase pedestrian and bicycle access to the businesses.

The Los Angeles Memorial Coliseum Commission stated a concern that the reduction in width of Bill Robertson Lane would lead to an indirect travel delay to adjacent local streets. The Proposed Project would continue to maintain one travel lane in each reduction, as well as the existing on-street parking on the west side of Bill Robertson. **Mitigation Measure T3** has been revised. The Special Event Section of LADOT shall revise the traffic management program during USC games accordingly to maintain adequate access to the Exposition Park parking lots along Bill Robertson Lane.

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

Master Response 34: On a few of the streets in the First Year of the Five Year Implementation Strategy that include bicycle lanes with heavy bus volumes, LADOT is evaluating or proceeding with bicycle-transit-

only lanes, which should improve bus performance along those corridors. In their comment letter, Metro expresses concern that the Proposed Project would result in increased transit delay, and in response would shift operations of southbound express bus services onto S. Flower Street. The Proposed Project has been revised, since the publication of the Draft EIR, to preserve an additional southbound travel lane between Exposition Boulevard and W. Adams Boulevard. Potential travel delay has been reduced substantially as compared to the travel delay impacts shown in Table 4.5-5 of the Draft EIR. See Changes Since Publication of the Draft EIR in the Introduction, and Corrections and Additions for revisions to Table 4.5-5. The decision to shift operations to parallel streets to gain operational efficiencies in timing is at the discretion of bus operators. LADOT shall continue to work with Metro on routes where bus performance may be potentially impacted.

As stated on Page 4.5-31 of the Draft EIR, the Proposed Project would maintain the northbound peak-period bus-only lane along S. Figueroa Street, which would help to avoid potential increase in transit delay for north-bound services during peak-travel times. **Mitigation Measure T1**, the adjustment to signal timing would also help to reduce transit delay in addition to general traffic delay. **Mitigation Measure T1** has been revised to provide preferential signal timing for transit vehicles through the transit priority system (TPS). See Master Response 21 related to Metro's preference for bus boarding locations. No other mitigation measures identified by the comments that would further reduce impacts to transit delay. In order to foster coordination to respond to potential short and long-term impacts to transit service, Metro Bus Operations Control Special Events Coordinator and Metro Service Planning & Scheduling shall be contacted in advance of installation of bicycle lanes and cycle tracks.

Socio-economic issues such as impacts to the costs of bus operations are not addressed by PRC Section 21080.20.5, or CEQA unless they lead to physical environmental impacts. See also Master Response 33.

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

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

See Corrections and Additions.

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

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

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

The perception of safety is one of the most important factors in choosing bicycle as a travel mode. In 2001, bicyclists in the United States had 12 times more fatalities than drivers per mile traveled.[10] The addition of bicycle lanes on arterial streets is shown to reduce the risk of serious injuries by about 30 percent, while the

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

upgrade to fully protected bicycle lanes or cycle tracks reduce the risk of injury by 90 percent.[11] Of 68 cities across California with the highest per capita pedestrian and bicycle collisions, per capita injury rates to pedestrians and bicyclists are shown to fall precipitously revealing a non-linear relationship of bicycle safety as the level of bicycling increases.[12] This study showed as much as an eightfold variation of collisions (expressed as a percentage of those that bike or walk to work) in comparing low and high bicycling cities. [13]

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

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

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

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

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

Master Comment 37: How can slowing traffic be beneficial?

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

Congestion is mostly experienced at peak travel times where roadway reaches its capacity to move traffic in a free-flowing manner. However, substantial safety risks are posed, especially during the off-peak period where driving above the speed limit is more common. Driving behavior is largely influenced by roadway design, and poses disproportionate risks to more vulnerable road users such as pedestrians and bicyclists. The

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

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

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

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

[15] Ibid.

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

[17] Ibid.

City lacks the ability to lower speed-limits in commercial arterials, which are determined by Section 2B.13 of the California Manual of Uniform Traffic Control Devices (MUTCD) based on the 85th-percentile speed that statistically represents one standard deviation above the average speed. Therefore, traffic calming measures such as narrowing lane widths, reducing travel lanes and introducing elements such as speed bumps and landscape medians is often used to reduce vehicle travel speed.

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

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

Master Response 38: Comments were submitted on the Draft EIR that raised concerns over diversion of traffic to parallel residential streets. However, these comments related to other proposed bicycle lanes in the Five Year Implementation Strategy where diversion to residential streets, as a result of increased congestion, was seen as a potential impact. For the Proposed Project, higher peak-period traffic volumes could divert to the I-110, or one of the parallel arterial streets. Streets that parallel S. Figueroa Street are major arterials dominantly comprised of urban commercial and institutional uses. As such, there would be no trip diversion along residential streets as a result of the Proposed Project. See Master Response 28.

However, in general, trip diversion to adjacent streets would not result in a significant noise impact. A doubling of traffic volumes would be required to increase noise levels by an audible 3 dBA. The Draft EIR presents a conservative analysis (in terms of identifying total delay) that assumes all cars will stay on the street with the bike lane. There could be some diversion to parallel streets. In general, traffic diversion is not anticipated to result in a doubling of traffic volumes on adjacent parallel routes. On streets where existing volumes are very low, should traffic volumes double, the resulting noise level would still be within the acceptable range for sensitive uses. For these reasons, the Draft EIR concludes that the proposed project would result in a less-than-significant impact related to mobile noise due to traffic diversion.

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

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

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

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

Master Comment 40: Increased bicycle trips should be quantified.

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

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

Skate boarders do not count as bicycle lane users.

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

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

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

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

Master Response 42: The traffic and safety analysis in the Draft EIR anticipated that the implementation of the Proposed Project would result in significant adverse traffic impacts at ten intersections along S. Figueroa Street during both the AM and PM peak periods. The Proposed Project has been revised in response to comments received during the comment period. The Proposed Project, as revised, would result in significant adverse traffic impacts at nine intersections along S. Figueroa Street during the AM and PM peak periods.

The specific additional delay (and total delay) in seconds at the following impacted intersections for the respective peak period along S. Figueroa Street are:

Olympic Boulevard: 47.4 (74.4) AM peak period and 35.3 (56.6) PM peak period
Pico Boulevard: 34.9 (52.4) AM peak period and 6.2 (25) PM peak period
Venice Boulevard: 47.7 (72.4) AM peak period and 75.5 (113.9) PM peak period
Washington Boulevard: 109.3 (251.8) AM peak period and 47.1 (113.2) PM peak period
23rd Street: 72 (86.2) AM peak period and 33.4 (54.1) PM peak period
Adams Boulevard: 123.1 (155.5) AM peak period and 33.4 (72.0) PM peak period
Jefferson Boulevard: 77 (120.7) AM peak period and 61.6 (100.5) PM peak period
Exposition Boulevard: 92 (122.1) AM peak period and 6.6 (45.4) PM peak period
Martin Luther King Jr Boulevard: 106.6 (185.1) AM peak period and 39.1 (132.3) PM peak period

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

Figueroa Streetscape (Proposed Project) Specific Comments and Responses

1. **The Proposed Project is in conflict with the Proposed Streetcar project from 7th Street to Olympic Boulevard.**

   LADOT is collaborating with Metro to ensure there is no conflict between bicycle lanes and the Proposed Streetcar. Where service overlaps with S. Figueroa Street, between 7th Street and 11th Street, the Proposed Streetcar will be designed to operate in the mixed-flow travel lanes that will remain upon completion of the Proposed Project.

2. **Please provide more specifics regarding the two southbound travel lanes on S. Figueroa Street.**

   Specific lane configurations for each segment of the Proposed Project, as revised, are described above in Changes Since Publication of the Draft EIR in the Introduction.

3. **Bike lanes should be protected with bike boxes at intersections.**

   Bike boxes are not yet approved according to the California Manual on Uniform Traffic Control Devices (CA MUTCD). However, the Suggestion shall be forwarded to LADOT for further considerations.

4. **On Figueroa, bus platforms in the parking lanes after intersections will make congestion worse by forcing buses to stop in the number two travel lane to pick up and drop off passengers effectively blocking traffic in these lanes, resulting in only one functional travel lane in each direction.**

   The comment is correct that buses will block the travel lane while loading and unloading passengers. However, bus loading areas will be on the far side of the intersection which better facilitates right turn

movements, and efficient flow of through traffic. In addition, passing traffic will still be able to merge in the right mixed-flow travel lane in front of bus platform areas, further minimizing additional congestion.

5. **Bus Platforms in these locations would force bus riders to step in to and cross bicycle lanes which would be hazardous.**

   The Proposed Project shall incorporate appropriate pavement marking and signs to highlight potential conflict zones into the design, and indicate to bicyclists to yield the right-of-way to pedestrians walking to and from transit platforms. See Corrections and Additions for revisions to **Mitigation Measure T6**.

6. **The project would result in impacts during construction. The City must commit to managing construction so as to minimize construction-related impacts and to not approve any traffic restrictions on cross and parallel streets that would make mobility along the Figueroa Corridor worse.**

   As stated in **Mitigation Measure T5**, LADOT shall manage construction activities to minimize traffic impact, and coordinate review of construction activities along cross and parallel streets accordingly. Future projects that have the potential to reduce capacity of cross and parallel streets will have to be evaluated with the context of the prevailing operational capacity of S. Figueroa Street. Construction traffic management is a committed part of LADOT responsibilities in undertaking any project. **Mitigation Measure T5** has been revised. See Corrections and Additions.

7. **Other universities in California, like UC Davis, Santa Barbara, and Berkeley have high bicycle ridership. Do the neighborhoods near those campuses have bicycle lanes? Do you anticipate that bike lanes near UCLA and USC, on Figueroa and Westwood corridors could have similar impacts on bicycle ridership?**

   Davis, Santa Barbara, and Berkeley all have an integrated network of bicycle lanes around their respective campuses, which contributes to their strong bicycle ridership. Increasing bicycle lanes is anticipated to increase bicycle ridership in general, particularly on routes used to access universities. See pages 3-2 through 3-5 regarding evidence that supports bicycle ridership in response to investments in infrastructure and demographic trends that support increasing bicycle demand.

8. **The intersection capacity/delay calculations for the revised S. Figueroa proposal would still show significant increases in intersection delays and congestion levels if the number of peak-period travel lanes is reduced.**

   The traffic analysis in the Draft EIR found that the Proposed Project would result in significant travel delay at ten intersections along S. Figueroa Street during both the AM and PM peak period. The average additional intersection delay studied in the Draft EIR included 177.4 seconds in the AM peak period, and 117.2 seconds in the PM peak period. The highest impacted intersections of those studied in the Draft EIR included 18th Street, projected to have an additional delay of 332.7 seconds during the AM peak period, and Washington Boulevard, projected to have an additional delay of 267.9 seconds during the PM peak period.

   In response to some of the concerns regarding travel delay, LADOT has revised the Proposed Project since the circulation of the Draft EIR. The Proposed Project, as revised, would continue to reduce traffic lanes in several segments along S. Figueroa Street, though to a lesser degree than originally proposed and evaluated in the Draft EIR. The Proposed Project would maintain: two northbound mixed-flow travel lanes, two southbound mixed-flow travel lanes, and a center left-turn lane from Martin Luther King Jr. Boulevard to Adams Boulevard; two northbound mixed-flow travel lanes, one northbound peak-period bus-only lane, and one southbound mixed-flow travel lane, and a center left-turn lane from Adams Boulevard to Venice Boulevard; two full-time mixed-flow travel

lanes in the southbound direction, two full-time northbound mixed-flow travel lanes and one northbound peak-period bus-only lane, and a center left-turn lane from Venice Boulevard to Olympic Boulevard; two full-time northbound mixed-flow travel lanes and a northbound peak-period bus-only lane from Olympic Boulevard to 9th Street; and two full-time northbound mixed-flow travel lanes, a northbound peak-period bus-only lane, and an additional peak-period mixed-flow lane on the west side of the roadway from 9th Street to 8th Street. The northbound peak-period mixed-flow lane becomes a full-time mixed flow travel lane just north of 8th Street. The northbound peak-period bus-only lane is a mixed-flow travel lane during the off-peak period.

The Proposed Project, as revised, would result in significant travel delay at nine intersections along S. Figueroa Street during both the AM and PM peak period. The average additional intersection delay would amount to 64.6 seconds in the AM peak period, and 28.0 seconds in the PM peak period. The highest reported additional travel delay is now projected to be 123.1 seconds during the AM peak period at Adams Boulevard, and 75.5 seconds during the PM peak period at Venice Boulevard, which constitutes a substantial reduction in both average and maximum travel delay as compared to the Proposed Project as evaluated in the Draft EIR.

See Corrections and Additions for revised impact analysis for the Proposed Project. Page 4.5-21 (Table 4.5-5).

9. Do not delay bicycle lanes along S. Figueroa St. Grand Ave., Martin Luther king Jr. Blvd., Venice Blvd., 7th St., and Venice Blvd.

Proposed Project includes a combination of buffered bicycle lanes and cycle-tracks along S. Figueroa Street. Bicycle lanes proposed for some portions of Grand Avenue, Martin Luther King Jr. Boulevard., Venice Boulevard., and 7th Street are included in the DCP Staff Recommendation Report for the First Year of the Five Year Implementation Strategy in the Central Area, released on June 20th, 2013, and were approved in the General Manager of LADOT Determination letter dated June 27th, 2013. LADOT shall be making a determination on whether to proceed with the Proposed Project once the DCP Staff Recommendation Reports have been transmitted to the General Manager.

10. How are impacts on the motion picture industry (and TV filming) being addressed? Cycle tracks and other visible changes would affect the usefulness of places in the City as filming locations.

Another comment raised concern that new bicycle facilities such as cycle tracks and buffered bicycle lanes would impact the motion picture industry, further limiting areas in the City that could be used as film locations. The potential conflict with film locations is not considered to impact traffic or safety. However, bicycle infrastructure is becoming a standard component of the transportation system in major cities through-out the country and the world, including those cities that are used for film locations. The installation of facilities such as cycle-tracks is not likely to make Los Angeles less competitive for filming. LADOT shall continue to work with Film LA to integrate features that are less visually intrusive and easily removable to continue to adapt the street for the purposes of filming.

Webinar General Comments and Responses

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

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

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

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

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

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

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

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

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

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

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

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

4.0 CORRECTIONS AND ADDITIONS

The following presents Corrections and Additions to the EIR that relate to the analysis of the Figueroa Streetscape Project (Proposed Project). The Corrections to the analysis of the remaining analysis in the Draft EIR on the First Year of the First Five Year Implementation Strategy that do not include the Proposed Project will be addressed in subsequent DCP staff recommendation reports to LADOT. In general new text is underlined and deleted text is in strike-through font.

Revised Proposed Project

In response to some of the concerns raised during the comment period, LADOT has revised the Proposed Project since the circulation of the Draft EIR. The Proposed Project, as revised, would continue to reduce traffic lanes in several segments along S. Figueroa Street, though to a lesser degree as originally proposed and evaluated in the Draft EIR. The last paragraph on Page 3-35 is revised as follows: The ~~MyFig~~ Proposed Project includes a combination of one-way separated bike lanes (in the direction of adjacent traffic) within the existing roadbed and between the curb and on-street parking, and standard bike lanes with painted buffers.

Page 3-34, the description of the Figueroa Streetscape Project under loss of travel lanes and parking lanes is revised to include the following:

> *South Figueroa Street (Martin Luther King Jr. Boulevard to 7th Street) and 11th Street (Figueroa Street to Broadway) - My Figueroa Streetscape Project*
>
> The Proposed Project would feature a combination of buffered bike lanes and cycle tracks along the corridor. Cycle tracks are dedicated bicycle lanes with additional separation form the adjacent travel lane. They are typically installed within the existing roadbed in the direction of adjacent traffic, either between the curb and on-street parking, or separated from vehicular traffic lanes by physical barriers. ~~from Martin Luther King Jr. Boulevard to Exposition Boulevard, a separated (protected) northbound bike lane from Exposition Boulevard to Venice Boulevard, a buffered northbound bike lane from Venice Boulevard to 11th Street, and a separated northbound bike lane from 11th Street to 7th Street. A southbound buffered bike lane would be installed from 11th Street to Washington Boulevard and a separated (protected) southbound bike lane would be installed from Washington Boulevard to Exposition Boulevard. Motor vehicle lanes would be reduced throughout the corridor: from Martin Luther King Jr. Boulevard to Exposition Boulevard, one southbound lane and the peak-period northbound lane would be eliminated. Parking would also be eliminated on the east side of the street. From Exposition Boulevard to 30th Street, peak period lanes in each direction would be eliminated, in addition to the elimination of one full-time lane in each direction. Parking would be converted from off-peak to full-time.~~
>
> ~~From 30th Street to Figueroa Way, the same conditions would apply, except the two (remaining) northbound mixed-flow travel lanes would merge into a single northbound auto travel lane at Figueroa Way to make way for the peak-period bus-only lane. Full-time parking on the west side of the street would be retained. From Figueroa Way to Venice Boulevard, the peak-period southbound lane and two northbound lanes would be eliminated. Off-peak parking would also be eliminated on the west side of the street.~~
>
> ~~From Venice Boulevard to 11th Street northbound and from 11th Street to Washington Boulevard southbound, buffered bike lanes would be installed; one northbound lane would be eliminated and one southbound lane would be eliminated south of Venice Boulevard. From 11th Street to 7th Street, only a northbound bike lane would be installed and it would be separated; one northbound lane would be eliminated. Where applicable, a center turn lane would be retained.~~

The Proposed Project, as revised, would eliminate one southbound mixed-flow travel lane and the peak-period northbound lane along Figueroa Street between Martin Luther King Jr. Boulevard and Exposition Boulevard. The revised configuration in this segment would be two north-bound mixed-flow travel lanes, two south-bound mixed-flow travel lanes, a center left-turn lane, and a standard bicycle lane in each direction. Approximately 23 off-peak period parking would be eliminated on the east side of the street from Martin Luther King Jr. Boulevard to Exposition Boulevard.

Between Exposition Boulevard and Adams Boulevard, the Proposed Project would eliminate the peak-period north-bound lane and one full-time north-bound mixed-flow travel lane. Between Exposition Boulevard and 30th Street, the Proposed Project would eliminate the peak-period south-bound lane. The revised configuration between Exposition Boulevard and Adams Boulevard will be two north-bound mixed-flow travel lanes, and two south-bound mixed-flow travel lanes, and a center left-turn lane. Cycle tracks are proposed from Exposition Boulevard to 21st Street in each direction. Approximately 38 off-peak period parking spaces would be eliminated on both sides of the street between Jefferson Boulevard and Adams Boulevard.

Between Adams Boulevard and Venice Boulevard, the peak-period southbound lane and one northbound mixed-flow travel lane would be eliminated. The revised configuration in this segment would be two north-bound mixed-flow travel lanes, one north-bound peak-period bus lane (mixed-flow off-peak), one south-bound mixed-flow travel lane, and a center left-turn lane. Approximately 61 off-peak period parking spaces would be eliminated on both sides of the street between 23rd Street and 17th Street.

Between Venice Boulevard and 8th Street, one northbound mixed-flow travel lane would be eliminated. From Venice Boulevard to Olympic Boulevard, there will be two full time mixed-flow travel lanes in the southbound direction and two full-time mixed-flow travel lanes one peak-period bus-only lane (mixed-flow off-peak) in the northbound direction, and a center left-turn lane. Buffered bicycle lanes are currently proposed between 21st Street and 11th Street in each direction. Ten off-peak period parking spaces would be eliminated from Venice Boulevard to Pico Boulevard on the east side of the street.

From Olympic Boulevard to 9th Street there will be a two full-time north-bound mixed-flow travel lanes and a peak-period bus-only lane, and a between 8th Street and 9th Street an additional peak-period mixed-flow lane on the west side of the roadway, which becomes a full time lane just north of 8th Street. A cycle track is proposed from 11th to 7th Street in the northbound direction only. 28 parking spaces would be eliminated on both side of the street between 8th Street and 7th Street.

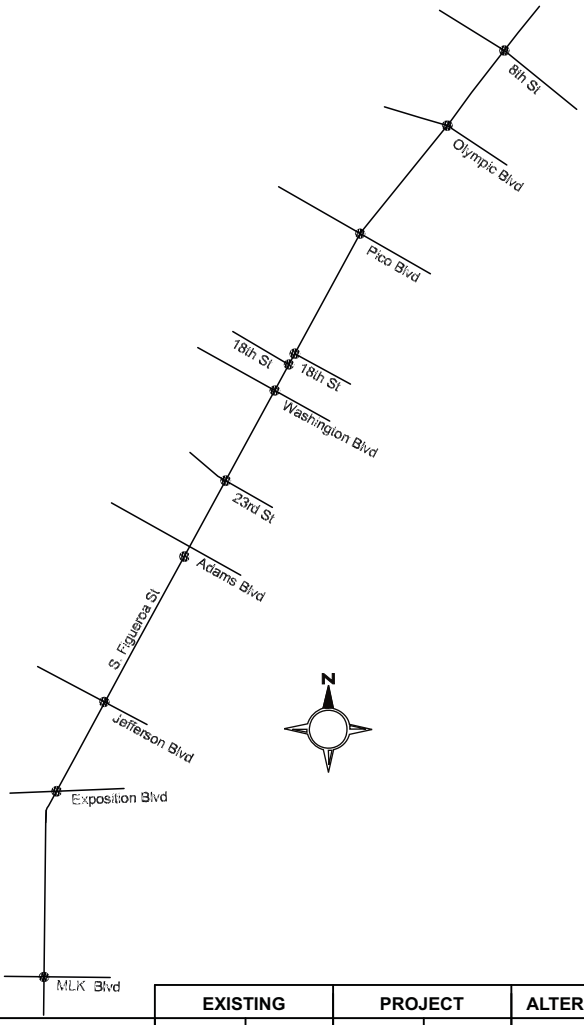
The Proposed Project would eliminate one eastbound travel lane on 11th Street between Figueroa Street and Broadway, and would install an eastbound buffered bicycle lane and maintain one eastbound travel lane between Figueroa Street and Broadway.

All signalized right-turn movements across the ~~separated bike lane~~ cycle tracks will be protected and right-turn pockets will be provided where applicable and where space allows. Where right-turn pockets cannot be accommodated, right-turns will not be protected and the ~~bike lane~~ cycle track will transition from protected to standard bicycle lane through the intersection. The peak-period bus-only lane would be retained throughout the corridor where it currently exists.

- Page 3-21 (Figure 3-12), Project Description, Labeling of Figures. Figure 3-12, (S. Figueroa Street) has been revised to show the new configuration and to clarify the labeling of project alternatives. In the Draft EIR, they show lane configurations as "Alternative 1" and "Alternative 2". In the following what is labeled as Alternative 1 is EIR Alternative 2A, and what is labeled as Alternative 2 is Alternative 2B:

  See revised figures.

	EXISTING	PROJECT	ALTERNATIVE 2A
N/S: S. Figueroa St E/W: 18th St	LOS: B / A Delay: 11.2 / 9.5	LOS: B / A Delay: 17.0 / 9.8	LOS: C / B Delay: 23.8 / 12.0
N/S: S. Figueroa St E/W: Washington Blvd	LOS: F / E Delay: 142.5 / 66.1	LOS: F / F Delay: 251.8 / 113.2	LOS: F / F Delay: 310.1 / 170.2
N/S: S. Figueroa St E/W: 23rd St	LOS: B / B Delay: 14.2 / 15.6	LOS: F / D Delay: 86.2 / 54.1	LOS: B / E Delay: 13.0 / 59.4
N/S: S. Figueroa St E/W: Adams Blvd	LOS: C / D Delay: 32.4 / 38.6	LOS: F / E Delay: 155.5 / 72.0	LOS: E / E Delay: 79.3 / 76.5
N/S: S. Figueroa St E/W: Jefferson Blvd	LOS: D / D Delay: 43.7 / 38.9	LOS: F / F Delay: 120.7 / 100.5	LOS: E / F Delay: 79.5 / 117.9
N/S: S. Figueroa St E/W: Exposition Blvd	LOS: C / D Delay: 30.2 / 39.5	LOS: F / D Delay: 122.1 / 45.4	LOS: E / D Delay: 70.1 / 48.2
N/S: S. Figueroa St E/W: MLK Blvd	LOS: E / F Delay: 78.5 / 93.2	LOS: F / F Delay: 185.1 / 132.3	LOS: F / F Delay: 185.2 / 132.2



	EXISTING	PROJECT	ALTERNATIVE 2A
N/S: S. Figueroa St E/W: 8th St	LOS: C / F Delay: 25.6 / 135.3	LOS: C / F Delay: 20.9 / 105.2	LOS: D / F Delay: 54.1 / 223.9
N/S: S. Figueroa St E/W: Olympic Blvd	LOS: C / C Delay: 27.0 / 21.3	LOS: E / E Delay: 74.4 / 56.6	LOS: C / B Delay: 27.0 / 19.9
N/S: S. Figueroa St E/W: Pico Blvd	LOS: B / B Delay: 17.5 / 18.8	LOS: D / C Delay: 52.4 / 25.0	LOS: E / C Delay: 60.9 / 28.8
N/S: S. Figueroa St E/W: Venice Blvd	LOS: C / D Delay: 24.7 / 38.4	LOS: E / F Delay: 72.4 / 113.9	LOS: F / F Delay: 80.1 / 116.3

LEGEND:

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

SOURCE: LADOT, 2012.

FIGURE 3-12
SOUTH FIGUEROA STREET - EXISTING AND PROPOSEDLANE INTERSECTION CONFIGURATIONS

- Page 3-39, the following is added to the list of subsequent actions and approvals:

  - Modification of street standard cross sections for Figueroa Street, and 11th Street.
  - Board of Public Works Approval for removal of street trees.

- Page 3-39, the following section 3.0 Project Description:

3.8 Environmental Compliance Conditions

The following mitigation measure is added to ensure impacts to biological resources are less than significant, as found in the Initial Study:

MM BIO1: Any tree removal that occurs under the Proposed Project would be inspected for bird nests prior to removal. Prior to the typical breeding/nesting season for birds (February 1 through September 1) trees to be removed from within the project area would be netted to prevent birds from inhabiting the trees prior to tree removal and construction.

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

TABLE 4.1-5: DAILY CONSTRUCTION EMISSIONS – YEAR 2013

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

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

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

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

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

  Localized. ~~Reconfiguration of roadway striping would potentially remove one or more vehicular travel lanes. Alternatively, existing parking lanes could be removed instead of vehicular travel lanes to incorporate the proposed bicycle lanes. Reducing the number of travel lanes would result in local traffic congestion, resulting in a signalized intersection worsening Level of Service (LOS) E or F. Localized high concentrations of CO concentration could occur where large amounts of traffic operate under heavily congested conditions and if vehicles would be idling for a substantial period of~~

~~time. Many roadway segments affected by the proposed projects already operate at or near capacity during peak hour periods and any incremental change in traffic volumes or vehicle idling emissions would not be significant. In addition, despite the fact the components of the proposed projects in traffic may decrease vehicle speeds and increase idle times at certain intersections, CO concentrations in the Basin have not exceeded State standards since 1992 due to stringent State and federal mandates for lowering vehicle emissions. This is accurate even when considering the most congested City intersections with the highest traffic volumes and largest percentage of vehicle idle time. It is not anticipated that any intersection affected by the proposed projects contains the requisite vehicle volumes and delays to generate a CO hotspot. Therefore, the proposed projects would result in a less-than-significant impact related to localized CO concentrations.~~

Reconfiguration of roadway striping would potentially remove one or more vehicular travel lanes. For purposes of identifying a conservative estimate of delay, the EIR assumes that vehicle traffic volumes on the various affected roadway segments will remain unchanged even where there would be a reduction in travel lanes and roadway to accommodate bicycle lanes. The pollutant most affected by traffic delay is carbon monoxide. Typically, CO emissions rate increase as vehicle speed decreases between the range of 10 miles per hour (mph) and 25 mph, and increases further as vehicle speed decreases to 2.5 mph idling speed. CO emissions rates increase as vehicle speed increase above 25 miles per hour.[23] 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 the peak hour could decrease, which could lead to the peak period being extended. 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. S. Figueroa Street is already congested and operates at or near capacity during peak hour periods and any incremental change in traffic volumes or vehicle idling emissions would not be significant.

Other factors taken in to account in the analysis are as follows: 1) the Proposed Project would affect capacity of approximately 0.08 percent of the roadway miles in the City of Los Angeles (5.2 miles out of 6,500) and 2) the existing ambient carbon monoxide levels are extremely low within the Los Angeles Air Basin. The one-hour concentration is typically 3 ppm and the 8-hour concentration is typically 2 ppm according to monitoring data for the SCAQMD monitoring station located in downtown Los Angeles. The Air Basin, is designated a maintenance area for carbon monoxide which means that that both State and federal air quality standards are satisfied. There are no air quality carbon monoxide hot spots within the basin as a whole or the City of Los Angeles in particular.

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

- Page 4.3-18 The following mitigation measure LU1 is revised as follows::

  MM LU1: The City ~~shall~~should facilitate identification of parking strategies (such as shared parking ~~districts~~) in locations where parking supply for commercial uses are highly utilized and, consists only of on-street parking that would be removed by the projects. The City ~~shall~~should implement feasible options to address any parking shortages.

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

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

[23] Federal Highway Administration (FHWA) website, http://www.fhwa.dot.gov/resourcecenter/teams/airquality/tinja.cfm, accessed on May 15, 2013

- Page 4.5-21 (Table 4.5-5), delay and LOS for intersections along S. Figueroa as follows:

No.	Street	Study Intersection	AM Peak Hour				PM Peak Hour			
			LOS	Delay (sec)	Change in Delay	Sig Impact	LOS	Delay (sec)	Change in Delay	Sig Impact
49	S. Figueroa St.	8th St	C	~~24.9~~ 20.9	~~0.7~~ -4.7	NO	F	~~109.2~~ 105.2	~~-26.1~~ -30.1	NO
50		Olympic Blvd	~~F~~ E	~~287.8~~ 74.4	~~260.8~~ 47.4	YES	~~F~~ E	~~159.2~~ 56.6	~~137.9~~ 35.3	YES
51		Pico Blvd	~~F~~ D	~~260.6~~ 52.4	~~243.1~~ 34.9	YES	~~F~~ C	~~176.2~~ 25.0	~~157.4~~ 6.2	YES
52		Venice Blvd	~~F~~ E	~~332~~ 72.4	~~309.2~~ 47.7	YES	F	~~294~~ 113.9	~~254.4~~ 75.5	YES
53		18th St	~~F~~ B	~~347~~ 17.0	~~335.9~~ 5.8	~~YES~~ NO	~~F~~ A	~~187.5~~ 9.8	~~178.1~~ 0.3	~~YES~~ NO
54		Washington Blvd	F	~~474.9~~ 251.8	~~332.7~~ 109.3	YES	F	~~334.6~~ 113.2	~~267.9~~ 47.1	YES
55		23rd St	F	~~86.5~~ 86.2	~~72.3~~ 72	YES	~~E~~ D	~~76.4~~ 54.1	~~60.8~~ 33.4	YES
56		Adams Blvd	F	~~167.2~~ 155.5	~~134.8~~ 123.1	YES	~~F~~ E	~~96.4~~ 72.0	~~57.8~~ 33.4	YES
57		Jefferson Blvd	F	~~120.5~~ 120.7	~~76.8~~ 77	YES	F	~~131.1~~ 100.5	~~92.2~~ 61.6	YES
58		Exposition Blvd	F	~~109~~ 122.1	~~78.7~~ 92	YES	~~F~~ D	~~108.7~~ 45.4	~~69.9~~ 6.6	YES
59		Martin Luther King Jr Blvd	F	~~185.3~~ 185.1	~~108~~ 106.6	YES	F	~~131.8~~ 132.3	~~38.6~~ 39.1	YES

- Page 4.5-28, in **Table 4.5-6**, South Figueroa Street from 21st Street to Venice Boulevard (adjacent to a number of car dealerships) an additional 20 to 30 spaces could be lost by the Proposed Project, which was revised to decrease delay as compared to the original design evaluated in the Draft EIR (See Changes Since Publication of the Draft EIR in the Introduction). The Draft EIR stated that the Proposed Project would result in a maximum additional loss of 11 spaces from 23rd Street to Washington Boulevard, 8 spaces from Washington Boulevard to 18th Street, 12 spaces from 18th Street to 17th Street for a total of 31 spaces in this stretch of S. Figueroa Street. The Proposed Project, as revised, would result in loss of an additional 20 to 30 spaces, for a total loss of parking on S. Figueroa of 150 to 160 spaces as compared to the total loss of 130 spaces shown in **Table 4.5-6**. **Table 4.5-6** is revised to show this change. Such loss of parking would not substantially add to impacts shown in the Draft EIR.

- Page 4.5-28 is revised to read: S. Figueroa Street, which is a major commercial street, would also have a substantial amount of parking loss (~~130~~160 spaces) due to the project.

TABLE 4.5-6: LOSS OF PARKING SPACES UNDER PROPOSED PROJECT

Study Area		*Parking Spaces Lost*	*Adjacent Land Uses*	*Affected Parking Hours*	
				N/W Side	*S/E Side*
S. Figueroa St.	Martin Luther King Jr. Blvd to Exposition Blvd	-23	Commercial	-	All Day except for AM/PM Peaks(1)
	Jefferson Blvd to Adams Blvd	-38	Commercial	All Day except for PM Peak(1)	All Day except for AM Peak(1)
	23rd St to ~~Washington Blvd~~ 17th St	~~-11~~61	Commercial/No uses between 18th St and 17th St	23rd St to 20th St: All Day except for PM Peak(1); 20th St to ~~Washington Blvd~~17th Street: All Day except	23rd St to 20th St: All Day except for AM Peak(1); 20th St to Washington Blvd: 9AM-3PM;

TABLE 4.5-6: LOSS OF PARKING SPACES UNDER PROPOSED PROJECT

Study Area		***Parking Spaces Lost***	***Adjacent Land Uses***	***Affected Parking Hours***	
				N/W Side	***S/E Side***
				for AM/PM Peaks(1)	Washington Blvd to 17th St: All Day except for AM/PM Peaks(1)
	~~Washington Blvd to 18th St~~	~~-8~~	~~Commercial~~	~~All Day except for AM/PM Peaks(1)~~	~~All Day except for AM/PM Peaks(1)~~
	~~18th St to 17th St~~	~~-12~~	~~None~~	~~All Day except for AM/PM Peaks(1)~~	~~All Day except for AM/PM Peaks(1)~~
	Venice Blvd to Pico Blvd	-10	Commercial	-	All Day except for AM/PM Peaks(1)
	8th St to 7th St	-28	Commercial	All Day	All Day except for AM/PM Peaks(1)
	Aggregate Loss	~~***-130***~~***160[2]***			

Source: LADOT
Note: AM peak period typically lasts from 7:00 AM. to 9:00 PM, and PM peak period lasts from 4:00 PM to 6:00 PM
1) Parking is already restricted in the AM and/or PM peak periods and thus the project would not affect parking where it is already restricted.
2) Represents worst case.

- Page 4.5-30, discussion of transit impacts is revised with the following:

  S. Figueroa Street – There are 20 bus routes operating along S. Figueroa Street in the study area, all of which serve only a portion of the study area. From ~~30th Street~~ Adams Boulevard to ~~Figueroa Way~~7th Street, ~~peak period lanes and a full-time travel lane would be eliminated in each direction to make way for the~~ a northbound peak-period bus lane shall be maintained so as to continue to facilitate transit travel time in the study area.

- Page 4.5-33, Footnote 28 is replaced with the following:

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

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

- Page 4.5-34, Mitigation Measure T1 is revised as follows:

  MM T1: LADOT will adjust traffic signal timing after the implementation of the proposed project (both along project routes and parallel roadways if traffic diversions has occurred as a result of the project). This adjustment would be necessary, especially at the intersections where

roadway striping would be modified. LADOT shall provide preferential signal timing for transit vehicles through the transit priority system (TPS). 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.)

- Page 4.5-34, Mitigation Measure T3 is revised as follows:

MM T3: ~~In areas where implementation of bike lanes could potentially result in diversion of traffic to adjacent residential streets, LADOT shall monitor traffic on identified residential streets to determine if traffic diversion occurs. If traffic on residential streets is found to be significantly impacted, LADOT will work with neighborhood residents to identify and implement appropriate traffic calming measures.~~ The Special Event Section of LADOT shall revise the Traffic Management Program to maintain adequate access to the Exposition Park parking lots along Bill Robertson Lane during special events and games, which may include temporary travel access along bicycle lanes.

- Page 4.5-34, Mitigation Measure T4 is deleted. This mitigation measure was included for other bicycle lanes proposed in the First Five Year Implementation Strategy that had the potential to overlap with other development projects' mitigation measures. This is not considered a potential impact for the Proposed Project.

~~**MM T4**: In cases where project-specific mitigation measures and bicycle lane improvements could overlap and/or be in conflict, LADOT shall assess potential for changes to previously disclosed impacts and shall ensure that any potential for new significant impacts is properly analyzed and addressed and additional mitigation required as appropriate consistent with AB 2245.~~

- Page 4.5-34, Mitigation Measure T5 is revised and remunerated as follows:

MM T~~5~~4: 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. The plan shall also coordinate review of construction activities along cross and parallel streets accordingly.

- Page 4.5-35, The Proposed Project does not include a bicycle-transit-only lane. Mitigation Measure T6 is revised to address potential pedestrian and bicycle conflict areas around the bus loading platforms. Mitigation Measure T6 is revised and remunerated as follows:

MM T~~6~~5: ~~Prior to the implementation of bicycle-transit-only lanes, safety training and information sessions shall be conducted for bus drivers and the members of Los Angeles County Bicycle Coalition. The training information sessions would involve, but not be limited to, educating drivers and bicyclists about giving equal weight and equal responsibility for each others' safety within shared right-of-ways.~~ LADOT shall incorporate appropriate pavement marking and signs to highlight potential conflict zones into the design, and indicate to bicyclists to yield the right-of-way to pedestrians walking to, and from transit platforms.

- Page 4.5-35, Mitigation Measure T6 is added to ensure emergency access is maintained along S. Figueroa Street. Mitigation Measure T6 is included as follows:

MM T6: Los Angeles Fire Department (LAFD) shall review final design of the Proposed Project to ensure that emergency response access is adequately maintained along S. Figueroa Street.

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

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

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

No.	Street	Study Intersection (1)	AM Peak Hour				PM Peak Hour			
			LOS	Delay (sec)	Change in Delay (sec)	Sig Impact	LOS	Delay (sec)	Change in Delay (sec)	Sig Impact
49	S. Figueroa St.	8th St	D	54.1	28.5	YES	F	223.9	88.6	YES
50		Olympic Blvd	C	27	0	NO	B	19.9	-1.4	NO
51		Pico Blvd	E	60.8	43.3	YES	C	28.8	10	YES
52		Venice Blvd	F	76.4	53.6	YES	F	114.9	75.3	YES
53		18th St	C	23.7	12.6	YES	B	12.2	2.8	NO
54		Washington Blvd	F	309.9	167.7	YES	F	170.3	103.6	YES
55		23rd St	B	13.1	-1.1	NO	E	59.4	43.8	YES
56		Adams Blvd	E	79.3	46.9	YES	E	76.5	37.9	YES
57		Jefferson Blvd	E	79.5	35.8	YES	F	117.9	79	YES
58		Exposition Blvd	E	70	39.7	YES	D	48	9.2	YES
59		Martin Luther King Jr. Blvd	F	185.2	107.9	YES	F	132.2	39	YES

SOURCE: LADOT, 2012.

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

Bike Lane Corridors and Segments		No. of Parking Spaces Lost	Adjacent Land Uses	Parking Hours	
				N/W Side	S/E Side
S. Figueroa St.	Martin Luther King Jr Blvd to Exposition Blvd.	-23	Commercial	-	All Day except for AM/PM Peaks
	AGG. LOSS	-23			

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