

January 19, 2016

Claire Bowin, Senior City Planner
Policy Planning and Historic Resources Division
Citywide Section
City Hall, Room 667

Subject: Review of Comment Letters on MP 2035 Amendment

Dear Claire:

We have reviewed the comment letters submitted to the City of Los Angeles regarding the Mobility Plan 2035 (MP 2035), including the letter dated December 17, 2015 that was submitted by Fix the City. We do not believe that the evidence submitted to date provides substantial evidence that would require the preparation of a subsequent environmental document.

Three specific comments were made regarding the CEQA findings of MP 2035:

- 1) A video was submitted showing a pedestrian accident on the portion of Rowena Road that was part of the Rowena Road Diet project. This new evidence does not change the findings of the MP 2035 EIR. MP 2035 is providing the foundation for a network of Complete Streets and establishing new Complete Street standards that will provide safe and efficient transportation for pedestrians (especially for vulnerable users such as children, seniors and the disabled), bicyclists, transit riders, and car and truck drivers. *The Complete Streets Design Guide: Great Streets for Los Angeles* provides a compilation of design concepts and best practices that promote the major tenets of Complete Streets—safety and accessibility. Due to specific site and operational characteristics associated with any given street, any proposed street improvement project must still undergo a detailed technical analysis by the appropriate city departments. Overall, this Guide hopes to indoctrinate the concept of Complete Streets into Los Angeles' present and future street design so that all stakeholders are able to plan for, implement, and maintain safe and accessible streets for everyone.
- 2) A report was submitted that had been published by the Reason Foundation on November 25, 2015 titled *Southern California Mobility Plan*. While the report contains opinions on the state of the current and planned transportation network in Southern California, it does not provide



any new substantial evidence that would change the findings of the MP 2035 EIR. In fact the report makes the following claims that are consistent with MP 2035:

- “The region’s planned transportation approach of investing heavily in fixed-rail transit and land-use changes to reduce the extent of driving can benefit the region but the approach will not significantly reduce traffic congestion...” (Page 2, Paragraph 1 of Executive Summary) The MP 2035 EIR analysis has similar findings regarding the ability for the region to reduce traffic congestion with planned growth.
 - “It is crucial to improve the transit network as well... We also provide details on how to build the success of the region’s express bus network and L.A. Metro’s BRT-lite system.” (Page 2, Paragraph 5 of Executive Summary). The MP 2035 Transit Enhanced Network would provide the infrastructure needed for Metro to further expand their high quality bus service throughout the City.
- 3) Commenters also referenced two articles by Garry M. Galles. The only one specifically cited was, “Traffic Plan May Fuel Health Risks,” **LA Business Journal**, November 30, 2015. We did not find the article attached to the comment letter. We found the article at <http://www.labusinessjournal.com/news/2015/nov/30/traffic-plan-may-fuel-health-risks/>. This article also does not support finding a need for a subsequent environmental document because it provides only unsubstantiated opinions of the relationship between congestion and emergency response times. It refers to studies that show health consequence of traffic calming, but fails to provide evidence or cite specific research or studies that provide a direct link between lives lost due to delay in emergency responders and traffic calming.



There are many opinions on how we will solve mobility issues in our communities and on-going research on the effectiveness of transportation improvements that promote traveling by modes other than single occupant vehicles. We do not believe that the evidence submitted to date provides substantial evidence that changes the conclusions made in the Final EIR regarding significant impacts or would require the preparation of a subsequent environmental document pursuant to the requirements of CEQA.

Sincerely,

A handwritten signature in blue ink that reads "Sarah Brandenburg". The signature is written in a cursive style with a large initial 'S'.

Sarah Brandenburg
Principal