Additional Subsequent Responses to Comments submitted to the Council File 15-0719

The following are additional responses that DCP staff has prepared that address the comments submitted that relate to analysis of the Mobility Plan 2035.

Relationship with Land Use

Several comments submitted to Council File 15-0719 suggest that the Mobility Plan 2035 (MP 2035) will up-zone, or lead to density increases in the city. The MP 2035 is not a land use plan and no by-right entitlement or increase in density is provided for by MP 2035. See Master Response 5 of the Final EIR related to growth inducing effects. Confusion over this relationship to land use policy may have its basis in the accessibility evaluation criteria applied to the MP 2035. The tenth enumerated benefit in the Statement of Overriding Considerations (SOC) related to increasing access to the high-quality transit facilities states the following:

> *The MP 2035 would result in more than 80 percent of the City's population and 85 percent of its employment being within one mile of a high-quality transit facility serving an additional 1.1 million residents and 370,000 jobs relative to the Future No Project. Accessibility to high-quality transit facilities within a quarter mile would increase more than three-fold for population and would more than double for employment between the Future No Project and Project conditions.*

The high-quality transit facilities as stated in the SOC refers to the MP 0235 Transit Enhanced Network (TEN), and does not equate with Transit Priority Areas (TPAs) and High Quality Transit Areas (HQTAs), as defined by Senate Bill (SB) 743 or the frequency or establish the location of Transit Stops, as defined by Section LAMC 12.22 A.25 (e). Some members of the public may inaccurately conclude that the TEN could increase the allotment of density bonus incentives pursuant to LAMC Section 12.22 A.25 (f), or any development incentive related to CEQA streamlining inferred by Senate Bill (SB) 743. The development of the TEN in the MP 2035 used as a basis the network of existing major bus routes (usually defined by 15-minute peak headway), and major bus routes that were already planned by the transit operator. The TEN only proposes operational improvements, and does not in itself create new Transit Stops or Major Transit Stops. As stated in responses A21 from the Addition to Final EIR submitted on June 17, 2015, the programming of Transit Stops or Major Transit Stops are at the sole discretion of the transit operator, and could proceed without the designation along the TEN. The TEN seeks to increase transit performance of services that are typically meeting the minimum 15-minute peak headway criteria through a combination of technological advances and facility treatments. See Section 2.5 on page 74 of the Draft MP 2035, and page 3-8 of the Recirculated Draft EIR (RDEIR) for the types of treatments that constitute the TEN. Also see responses A11 and A21 from the Addition to Final EIR submitted on June 17, 2015.

Accessibility Metrics

Another comment contends that there is no factual support for the conclusion that the MP 2035 will increase population and jobs within a quarter mile from high-quality transit facilities, also known as the TEN. Page 4.1-27 through 4.1-28 of the RDEIR defines these accessibility metrics under which the MP 2035 is evaluated, in addition to traditional delay metrics and vehicle miles travelled (VMT). Table 4.1-34 and the analysis on page 4.1-60 through 4.1-65 of the RDEIR supports the SOC conclusion about increased accessibility as defined above by evaluating the area of the city that would receive transit enhancements as prescribed by the TEN, and forecasting the population that would be within on-quarter mile of such facilities. This analysis does not assume any changes to the existing land use designations or zoning.

A comment also alleges evidence from a 2015 Mineta Institute Report that LRT will have low utilization by people residing beyond ½ mile of the facility.[1] This study supports the finding that households living in close proximity to LRT reduce their VMT by almost 10 miles per day relative to control households, but that households living near bus stops that were eliminated as part of service changes increased their VMT by almost 5 miles per day. As stated above, the MP 2035 expands overall access to transit enhanced corridors, and should result in corresponding decrease in VMT. There is a preponderance of evidence that living close to transit will increase transit usage, and lower VMT. A meta-analysis showed relatively high increase in transit utilization as distance to transit decreased, outperforming other land use strategies.[2] We also submit the following sources into the record that support the conclusion that decreased distance of residents and employers to transit increases transit ridership.

Cervero, R., and G.B. Arrington.2008. Vehicle Trip Reduction Impacts of Transit-Oriented Housing. Journal of Public Transportation, Vol. 11, No. 3, 2008

Evans, J., et al. 2007. Transit Cooperative Research Programs (TCRP) Report 95, Chapter 17, Transit Oriented Development. Transportation Research Board

Lund, H., et al. 2004. *Travel Characteristics of Transit-Oriented Development in California.*

Safety Evidence of Complete Streets

In addition to all other evidence in the record, including but not limited to the DEIR, FEIR, all technical appendices to the EIR, written and oral testimony by City staff and the City's consultants, the Findings are supported with the research on bicycle safety with the following resources:

FHWA. 2015. Bicycle Safety Guide and Countermeasure Selection System.

Jacobsen. 2012. Safety in numbers: more walkers and bicyclists, safer walking and bicycling. Injury Prevention

Teschke, Kay et al. 2012 Route Infrastructure and the Risk of Injuries to Bicyclists: A Case-Crossover Study. American Journal of Public Health, December 2012, Vol 102, No. 12

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

NCHRP Report 622: Effectiveness of Behavioral Highway Safety Countermeasures

FHWA. 1999. A Comparative Analysis of Bicycle Lanes Versus Wide Curb Lanes: Final Report. PUBLICATION NO. FHWA-RD-99-034.

Transportation Research Board. 2012. TCRP Report 95, Chapter 16. Pedestrian and Bicycle Facilities Traveler Response to Transportation System Changes

Other sources are countermeasure case studies[3] on the Federal Highway Administration (FHWA) website, and a research library[4] hosted by People for BIkes, a non-profit organization.

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[1] Nixon, N., et al. 2015. *Changes in Transit Use and Service and Associated Changes in Driving near a New Light Rail Transit Line*. Mineta Transportation Institute Report 12-44.

[2] Ewing , Reid and Robert Cervero. 2010. *Travel and the Built Environment: A Meta-Analysis.* Journal of the American Planning Association, Summer 2010, Vol. 76, No. 3

[3] http://pedbikesafe.org/BIKESAFE/casestudies.cfm?op=C&subop=b&CM_NUM=11

[4] http://www.peopleforbikes.org/statistics/category/safety-statistics