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May 24, 2015

City Planning Commission

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Re: The Mobility Plan 2035 Update to the 1999 City of Los Angeles  
Transportation Element of the General Plan

Case No.: CPC-2013-0910-GPA-SP-CA-MSA and  
CEQA No.: ENV 2013-0911-EIR

City Planning Commission Hearing

Thursday May 28, 2015 8:30 a.m.

Van Nuys City Hall, Council Chambers 2<sup>nd</sup> Floor

Van Nuys, California

Dear Gentilepersons:

Hollywoodians Encouraging Logical Planning [HELP] and Citizens Coalition Los Angeles [CCLA] submit their comments on the Final Environmental Impact Report for the above referenced project and case. Please add these comments to the Administrative Record and distribute them to the members of the City Planning Commission well before the hearing,

## **1. The Entire Mobility Plan 2035 Is Based on Fatally Flawed Data**

The Mobility Plan 2035, as well as Mayor Garcetti's Sustainability pLAn, are based on false population projections. When the premise of the size of the population in 2035 is materially wrong, then the conclusions based on that false assumption deprive the entire Plan of legitimacy.

The Sustainability pLAn is relevant to the Mobility Plan 2035 because its data for the 2035 population is materially different from the population projection under the Mobility Plan 2035. When the City issues two major Planning documents for year 2035 within a couple months of each other, their population projections should be in the same ball park. When there is a huge discrepancy, then no one may rely on either Plan.

Sustainability Plan says at least 500,000 more people by 2035, but the Mobility Plan 2035 says 318,500 by 2035. That is a difference of 181,500 ppl. The discrepancy is about 50%, depending on which number one selects as the base number. Both Plans need to address this significant problem, and since Mobility Plan 2035's FEIR issued after Sustainability pLAn, Mobility Plan 2035 had a duty under CEQA to address this matter.

The problem, however, is far more serious.

## **2. Both Plans' Population Estimates are Fatally Flawed**

When one looks closer that population trends based upon reliable data from the US government, the state of California and impartial demographers, one see that population projects in both The Sustainability pLAn and the Mobility Plan 2035 are materially wrong. The following table shows the reason both Plans are based on fatally flawed data. 1990 to 2010, L.A. had the following population increase:

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Concerned Citizens Los Angeles [CCLA] - Joint Comments on The Mobility Plan 2035  
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Data from the US Census shows how Los Angeles has grown since 1890.

Year	Population	Ten (10) Year Population Increase
1890	50,395	
1900	102,479	52,084
1910	319,198	257,475
1920	576,673	257,475
1930	1,238,048	661,375
1940	1,504,277	266,229
1950	1,970,358	466,081
1960	2,479,015	508,657
1970	2,816,061	487,835
1980	2,966,850	150,789
1990	3,485,398	518,548
2000	3,694,820	209,422
2010	3,792,621	97,801

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In the last decade, Los Angeles had the smallest population increase of any decade since 1890 to 1900. In the decade between 1890-1900, we added only 52,084 people. However, that increase more than doubled the size of LA.

Thus, the US Census shows that the rate of LA's population increase is drastically slowing. In the prior decade, LA grew by less than 100,000 ppl.

The Mobility Plan 2035 then invents a population increase, while ignoring the demographic evidence, that LA will not experience an increase in its rate of growth and it more likely to grow at a slower rate and it could begin to loose population.

According to the Sol Price School of Public Policy, there are many reasons that the growth will be very slow for the next several decades.

1. Low Birth Rates: In 2011, the birth rate in Los Angeles county was fully 35% lower than in their peak year of 1990.

2. The Annual In-Flux of New Immigrants is Decreasing: This drop-off has been much steeper in Los Angeles than in the state as a whole.

3. The Percentage of Foreign Born is Declining: The total foreign-born share of the Los Angeles population peaked at 36.2% in 2000 and is expected to remain stabilized at that level or slightly lower through 2030.

4. A Soaring Senior Ratio: With the ranks of young adults depleted by shrinking numbers of grown children, the ratio between seniors ages 65 and older and adults in prime working ages between 25 and 64 is expected to rise dramatically.

Likewise, The Manhattan Institute in 2012 explained the factors which showed that it was unlikely that Los Angeles's rate of growth would increase. *Manhattan Institute Civic Report, No. 71 September 2012, THE GREAT CALIFORNIA EXODUS: A Closer Look, by Tom Gray & Robert Scardamalia* The City has to take many factors into account. For example,

Time will tell if the century's second decade continues the migration [downward] trend of the previous ten years. What seems unlikely to change, though, is California's poor position relative to other states in the competition for jobs and business expansion. The Tax Foundation's latest (2012) State Business Tax Climate Index ranks California less favorably than 47 other states. In 2011, the Milken Institute ranked 200 U.S metropolitan areas according to

their growth in jobs and wages, and only one California metro area, Bakersfield, made the top 50 (at 46th). The Milken survey also suggests that the past decade's destination states haven't lost their appeal. Of the 50 highest-ranked metro areas, 22 were in the top ten destination states, with 11 in Texas alone. Only eight of the top 50 areas were in the top ten sender states. The two biggest senders of migrants to California—New York and Illinois—had no high-growth cities at all. *Page 21 of 23*

While Los Angeles is the nation's second largest city, it does not break into the top 50 for growth in jobs and wages. A city is way down the ladder for increases jobs is not going to have significant growth.

The USC School Sol Price 2013 Generational Future of Los Angeles also found that we are having a “pervasive slowdown in population growth.”

The review of past and future trends offered in these pages identifies 10 major findings, as summarized in the Executive Summary. But all these can be described as elements of the growing demographic maturity of Los Angeles, **characterized by a pervasive slowdown in population growth** and ethnic change. Three specific, major transformations are reshaping the population for the future. **First** is the surprising downturn in immigration toward many fewer new arrivals and a steady upturn in the foreign-born presence made up of long-settled residents. **Second** is a multifaceted generational transformation, including changes among both young and old. And **third** is a homegrown revolution that increases urgency and the sense of responsibility and dependence. [bold added] *Sol Price 2013 Generational Future of LA page 1*

The other two largest cities, Los Angeles and Chicago also had

larger domestic migration losses (61,000 66,000 respectively) than the other cities. Washington had by far the largest reversal, experiencing a domestic migration loss of 25,000, down from a plus 43,000 between 2012 and 2013. *March 27, 2015, Still Moving to Texas: The 2014 Metropolitan Population Estimates, by Wendell Cox*

In face of governments' and private foundations' demographic analyses finding that both the State's and the City' population growth is decreasing, Mobility Plan 2035 posits a dramatic population increase. According to the US Census, in year 2010 we had 3,792,621 ppl. According to The Mobility Plan 2035, the City astoundingly had increase pf 211,779 ppl in the next two years. That is an increase of about 105,890 pp per year. *Table 4.1-15, page 4.1-21, The Mobility Plan 2035 Transportation Section*

The City expects us to believe that in one year, Los Angeles's population zoomed up more than it had in the prior ten (10) years! There is no rational basis for the claim. To the contrary, the facts show that the claim is materially false.

## **5. How Does the City Manufacture its False Data?**

In some cases, the City just makes a number which will help it reach its goal. No one can never find the factual support. Other times is use materially misleading data from which to extrapolate to absurd conclusions.

For example, many of the units in over-built Hollywood cannot attract renters or buyers. A new business has arisen AirBnB.com where condos and single family homes are used as hotel rooms. If the city counts these hotel rooms as occupied residences, then it hypes the number of people who live in an area.

Such fudging of the numbers conceals the fact that the part of town,

particularly Hollywood, is over built for the current residents and for people who would want to settle down in Hollywood. Instead it reflects a transitory population, which is not properly counted as residents.

Other times, the City alludes to Southern California Association of Government [SCAG]. Mobility Plan 2035 does that, but there is no data to back up that reference to SCAG. As HELP discovered during the Hollywood Community Plan, t times SCAG will make private calculations for the City which are not published. The City then takes this secret data but does not place the data into the Administrative Record. In the Hollywood Community Plan litigation after SCAG dramatically reduced its population estimate for Hollywood by 24,000 ppl, the city concealed that from the public and from the Court.

Thus, the public is now faced with bogus population projections by a City which the courts have consistently found uses fatally flawed data.

## **6. The Most Bed Rock Decision Is Taken Away from the Public**

When data is distorted in this manner, the public is deprived of the opportunity to make the most important decision – What type of City should LA be? A very important paper to read in thinking about this question is What is a City For? By Joel Kotin (This document has been added to the Administrative Record)

By omitting this type of fundamental consideration, the public is deprived for the opportunity to make the most bed rock decision about the nature and quality of the City. Instead, the public is misled to believe that LA is facing a horrendous population increase and we must prepare for it without contemplating any significant Alternative.

## **7. Lack of Proper Range of Alternatives**

The Mobility Plan 2035 lists a variety of CEQA Alternatives, but they are merely variations on the same theme, i.e. a large population increase requires more mass transit and more bicycles.

The reality is far different. Los Angeles is highly unlikely to have a significant population increase and concentrating population in Transit Oriented Districts make population congestion worse. *A New Planning Template for Transit Oriented Development, Mineta Transportation Institute, 2001*

In fact, fixed-rail transit in a huge urban area becomes The Problem and it is not a solution. *1915 Study of Street Traffic Conditions in the City of Los Angeles*

The purpose of TODs is not to make the City more livable but to maximize the property values of a few land to the detriment of everyone else. *1915 Study of Street Traffic Conditions in the City of Los Angeles page 38*

## **8. Other Vital Factors That Are Not Properly Considered**

### **A Traffic Studies Are Deficient**

Where the traffic affects State roadways, CalTrans is the responsible agency and the City is not free to use its own methodology rather than its following the methods, procedures and standards set by CalTrans. *Pub Res Code, § 21080.4(a), CEQA Guidelines § 15096(e)*

### **B Impact of Partial Construction of Bicycle Lanes**

There is inadequate data to assess the impact of partial bicycle BENs. To the extent that BENs may attract more cyclists, there is not adequate data on the impact when the BENs end. The FEIR correctly assesses that the streets in

Hollywood are too narrow from the constitution of Protected Bicycle Lanes (a concert with is not adequately defined in the EIR or the FEIR), but the EIR and FEIR do not analyze the impact of BENs ending at Hollywood's western border.

**C Inadequacy of Protected Bicycle Lanes**

There is insufficient data to know whether Protected Bicycle Lanes are actually safer when all the factors are assessed. Parking cars several feet from the curb can have unintended consequences. The alleged solution for people to exit from the passenger side of their cars is nice is one lives in 1955 when cars had large bench seats which one could easily slide across. In today's cars, it is close to impossible to climb over the console in order to exit on the passenger side.

**D Air Quality for Bicyclists**

While it is anticipated that within a few decades most cars will be electric with the generating stations far away from urban areas, until that day causing people, especially children to ride in the heavy air pollution of major thoroughfares, is dangerous to health.

According to the American Lung Association, Los Angeles-Long Beach area ranks as the #1 (worse) in Ozone, #3 in Year round Particle Pollution, and #4 Short Term Particle Pollution. <http://bit.ly/QYrea0> American Lung Association, State of the Air, website

**D Population Density Cause Traffic Congestion and Air Pollution**

Population Density is perhaps the single greatest cause of Los Angeles ills. It causes traffic congestion. The more people per square mile, the more cars per square mile. People who live in TODs use cars. Their work destinations, even

when they are within ½ miles of a subway station, often do not control the decision whether to drive or take mass transit.

E. Experience Is Showing That Bike Lanes Are Harmful to the Quality of Life

The May 21, 2015, The Eastsider, *Is Silver Lake's Rowena road diet a disaster?* reports how the Bike Lanes on Rowena in Silver Lake had made the traffic situation worse. The City, however, keeps this material out of the Administrative Record.

**9. The CEQA Duty To Include All Alternatives:**

The Mobility Plan's 2035's Exclusion of the Alternative Form of Transportation, Virtual Presence, is a Fatal Flaw under CEQA.

An Environmental Impact Report [EIR] has the duty to set forth and examine all reasonable alternatives. The DEIR and FEIR exclude a known, reasonable alternative which has official documentation going back to 1993. The Alternative has different names just as some people call The Subway "The Underground" or "The Tube." For some, this alternative mode of transportation is called Tele-commuting, for others it is Telepresence (Cisco), the federal government uses Telework, but for these comments, the term is **Virtual Presence**.

**10. The Need For Mobility Plan 2035 to Include Virtual Presence Into the CEQA Alternative**

It is not the duty of the citizens to conduct the study into this mode of transportation and how it interacts with other modes of transportation and to

assess how it is likely to change living and transportation decisions over the next couple decades. It is sufficient for the public to bring The City's attention its failure to study this alternative.

**Virtual Presence** (VP) is a form of Transportation which has been officially recognized both by the federal government and Los Angeles County. VP is the marriage of Telecommuting and Social Networking made possible by the technological advances in the last two decades. The improved technology allows for two-way visual and oral communication on life size monitors. With the 3-D monitors along with the ability for multi-way televised communication between people miles apart, Virtual Presence is a form of transportation which the EIR may not legally ignore.

The 1993 City of Los Angeles Telecommuting Project (copy submitted herewith) identified and discussed in detail the transportation alternative of Telecommuting. Mayor Bradley commissioned the study in 1989 and the project was run during 1992 and the Study was published in 1993. Thus, the drafters of the DEIR had to be aware of the efficacy of this form of transportation, yet the DEIR fails to consider it. Furthermore, the federal government has published since 2002 (Annual Status of Telework in the Federal Government).

Because Virtual Presence is not confined to the workplace, but is becoming part of social networking, VP will be used for a significantly larger share of transportation in the upcoming years. The vastly enhanced technology makes extended family interactions over a few miles or over thousands of miles far more feasible than a few years ago.

While a lot of VP will be used for national and international socialization, it works just as well within an urban area. The speed of VP is one feature that is making it the preferred mode of transportation.

Right now all the studies show that productivity goes up with more telework. To what extent that is due to being out from beneath the boss' thumb is not known. Nonetheless, VP does allow the manager to confer one employee or simultaneously with several employees in different departments in different locations for 5 or 10 minutes and then everyone goes back to their projects.

The efficacy of VP as a form of transportation will only increase with technological improvements. No other form of transportation allows people to be in Westwood as quickly they are in Singapore or to be in both Singapore and Westwood simultaneously.

Because the Telecommuting is a viable Alternative form of transportation, **Virtual Presence** in 2015 is a viable Alternative Transportation which may not be excluded from the CEQA Range of Reasonable Alternatives. As the 1993 Study noted, traffic congestion and need for office space was reduced by 30% – based on 1992 technology.

As will be seen, Virtual Presence satisfies many of the transportation goals of The Mobility Plan 2035 with no adverse environmental impact and with no drain on tax dollars and without the eminent domaining of a single piece of property. VP requires no underground easements beneath private property, nor does it require higher housing density to be cost-effective. It does not cause pollution or bring people into more contact with polluted air as do VENs and BENs.

## **11. The Purpose of The Mobility Plan 2035**

The so-called Blue Print for the Transportation of the City of Los Angeles omits the most prevalent new form of transportation. Transportation is not limited to people's physical presence in a specific location. Nonetheless, the Mobility Plan 2035 is stuck back in 1935.

The MP 2035 (formerly the Transportation Element) is the

transportation blueprint for the City of Los Angeles. Last updated in 1999, the MP 2035 is being revamped to reflect the policies and programs that will give Angelenos a full range of options to meet their mobility needs, including bicycling, car pooling, driving, transit, and walking. The MP 2035 will lay the policy foundation for safe, accessible and enjoyable streets for pedestrians, bicyclists, transit users, and vehicles alike. *DEIR Section 3. Project p 3-1*

Virtual Presence is as effective to shop in Tokyo as it is to shop in Hollywood – the whole world Fed Ex’s packages. Virtual Presence is as effective to commute to a meeting in West Hollywood as it is to commute to a meeting in Moscow. VP allows four members of a rock band to synchronize their playing no matter where they are located: Long Beach, Woodland Hills, Covina, and West Hollywood are all one location in Virtual Presence. (*See Time-Warner TV advertisement*)

Virtual Presence has a feature which no subway or bicycle or car can match. It travels at 186,000 miles per hour. Why would a businessman waste a hour traveling from Santa Monica to Glendale to meet with his lawyers, when he can be there in a blink of any eye?

Why would an entrepreneur from Newport Beach drive to L.A. for a conference when most the other attendees will be there via VP?

Who wants to pay their lawyer \$500/hr to drive downtown for a five minute hearing, when the lawyer can attend via VP and reduce his bill by \$450?

Why would anyone want to walk or take a bus to a subway station, walk down into the earthquake prone Underground and then ride a noisy, dirty, dangerous subway only to have to emerge from the depths and walk another 5 or 6 blocks to reach his/her destination when he/she can be there in less than one second?

## **12. Virtual Presence Accomplishes the Goals Transportation When Actual Physical Presence is not Required**

As will be seen, the 1993 Telecommuting Study made clear that Virtual Presence satisfies the purpose and need for the Subway.

*Improve Study Area mobility and travel reliability:*

Not only does Virtual Presence improve mobility within the travel Study area, it improves it worldwide. In order for a subway to cover the very limited area of Los Angeles County will require a \$2 Trillion Dollar investment – and you are still stuck in L.A. VP takes you worldwide.

*VP Would Improve transportation services*

Virtual Presence will also improve the surface physical transportation by the dramatic reduction in the use of physical transportation. The transit times on buses and cars from downtown to the sea will be significantly reduced due to the 30% (or more) demand for physical transportation. The DEIR admits that it will decrease traffic congestion by no more than 1%. 1% is not an improvement. The transportation modality that reduces congestion by 30% (or more) is clearly superior to the system that may reduce traffic congestion by 1%.

*Improve access to major activity and employment  
centers in the Study Area;*

Virtual Presence which moves at 186,000 mph provides much faster access to businesses and homes within the Study area than any subway, while at the same time it also provides instant access to the entire globe.

*Improve opportunities for transit supportive*

*land use policies and conditions;*

These are code words for **mega-density**. Population density is causing people to depart from Los Angeles. For two decades, excessive density has Los Angeles County to experience an exodus of the middle class to less dense countries, e.g. Riverside, and to less dense states. Cramming more and more people into less and less space is a hideous condition to be avoided. As the words imply, these “*transit support land use policies*” are caused by the Subways. More recently, The City thinks that bicycles will make their mega-dense projects profitable, when density itself of the problem. In brief, this goal means billions of dollars for land developers in an area filled with some of Los Angeles most significant R-1 neighborhoods. See following articles

<http://bit.ly/1FVZtEp> March 25, 2015, JWalshConfidential, *Power Corrupts; Corruption Destroys* – by Scott Zwartz

<http://bit.ly/1J9SAiO> April 29, 2015 JWalshConfidential, *Garcetti’s Sustainability pLAN is Based Fatally Flawed Data* – By Scott Zwartz

To the extent the CRA/LA was involved and now the City is simply giving away hundreds of millions of tax breaks mean that LA will see an additional erosion of the City’s tax base, making it impossible for the city to provide basic services to anyone.

The EIR needs to take account of the fact that population density is likely to become a huge liability with the advent of VP. The dense housing which the DEIR contemplates cannot compel people to live in high rise tenements. If this were Siberia and not Southern California, the population might like the idea of huge dense population centers all under a huge dome to protect them from the terrible weather. People, however, do not come to Los Angeles to lives as if they

were in the frozen tundra.

### 13. Legal Duty to Consider Reasonable Alternatives:

- Each project needs to be evaluated on the basis of the reasonable alternatives to that particular project. Citizens of Goleta Valley v. Board of Supervisors, (1990) 52 Cal.3d 553, 566, 276 Cal.Rptr, 410

The DEIR cannot deny that Virtual Presence in the form of Telecommuting was a reasonable alternative mode of transportation which it had to consider. Based on 1992 technology, the 1993 LA Study found a 30% decrease in congestion and a 30% decrease in the need for office space. That study alone rebutted the population premises of the DEIR and showed that another form of transportation was far more efficacious.

- The DEIR had the duty to formulate the reasonable alternatives. Citizens of Goleta Valley v. Board of Supervisors, (1990) 52 Cal.3d 553, 568, 276 Cal.Rptr, 410

As remarked above, the duty to study alternatives and to include them into the CEQA analysis rests with the City and not with the public. HELP and CCLA have already provides more than sufficient information for the FEIR to be re-done due to significant new information which has been excluded from the EIR.

- The Alternative need only be “potentially feasible.” CEQA Guidelines, § 15125.6 (a),

While older people may be so accustomed to older ways and fail to grasp the implications of newer technologies, that is not a basis to exclude a reasonable alternative from the DEIR. Although Virtual Presence has in essence arrived, its habitual application has not. Nonetheless, the DEIR had a duty to make an exhaustive study of the **potential feasibility** of this technology. Mira Mar Mobile Community v. City of Oceanside (4<sup>th</sup> dist. 2004) 119 Cal.App. 4<sup>th</sup> 477, 489, 14 Cal.Rptr 3d 308

When the EIR fails to include a complete analysis of all reasonable, known, and potentially feasible Alternatives, it destroys the factual basis for approval of the EIR. For that reason, omitting Virtual Presence will make the EIR subject to de novo review.

● Unless rectified, the DEIR's and FEIR's procedural failure merits review de novo. California Native Plant Society v. City of Santa Cruz (2009) 177 Cal. App.4th 957, 981, 984.

Courts must "scrupulously enforce all legislatively mandated CEQA requirements." (Goleta II, *supra*, 52 Cal.3d at p. 564.) To do so, "we determine **de novo** whether the agency has employed the correct procedures" in taking the challenged action. [Cite omitted] California Native Plant Society v. City of Santa Cruz (2009) 177 Cal.App.4th 957, 984.

There is no legitimate reason for the City to have ignored VP. As HELp, CCLA and other have shown, The Mobility Plan 2035 is designed to support increased future population density, which is largely illusory. Artificially increasing population density is contrary to L.A.'s General Plan. Going back to 1915, the City acknowledged that attempts to create pockets of super-density would serve only to make a few people wealthy to the harm of everyone else. The exclusion of Virtual Presence's impact on Los Angeles' future will not be given deference by the courts.

Because VP will result in people wanting larger homes, the vertical pigeon coops that the City is attempting to construct will become even more financially infeasible. The principle is simple – the more time people spend at home the more space people will want at home.

Thus, VP will make mega-density more undesirable for the vast majority of the population than present. The City knows that with the advent of the Hollywood subway and the CRA projects, thousands of people fled Los Angeles, the socio-economic status of the Flats [CD #13] decreased. CD#13 lost so many people between 2001 and 2010, that it ceased to qualify as a legitimate council district.

CEQA requires that the City study the interrelationship between increased population density and Virtual Presence. The studies to date indicate that VP will hasten the exodus from the dense areas, leaving a heavier concentration of the poor in the denser population centers.

#### **14. In Los Angeles, Distance is Measured in Time**

As everyone knows, distance is measured in time. When VP removes 30% of the traffic from the streets and freeways, every where in Los Angeles will be much closer.

We are proposing to spend billions of dollars on concrete and other 19<sup>th</sup> century “solutions” like subways, when we should be investing the money in 21<sup>st</sup> century technology. The City had an affirmative obligation to study Alternatives which incorporate Virtual Presence as a component. None of The Mobility Plan 2035's alternatives include VP. That is a fatal flaw under CEQA.

Unless there is a full analysis of Virtual Presence and its potential place in society within ten years, the FEIR will have made a procedural violation subject to de novo review. CEQA Guideline, § 15126.6(a), (f)

#### **15. Summary of The Need To Have Included Virtual Presence**

Mobility Plan 2035 will impact the City far past 2035. While VP may not realize it potential for 5 to 10 years, that does not remove the CEQA requirement to study is benefits and detriments. The City needs to study how VP will help the

City and how it will make other plans, e.g. projects like The Millennium Towers even more harmful to the City.

Yet, The Mobility Plan 2035 was silent on VP and thereby making itself fatally flawed under CEQA.

Virtual Presence, called TelePresence © by Cisco, is a mod eof transportation and there is no excuse of the City to have omitted it from Mobility Plan 2035. In 2001, Mineta Transportation Institute was urging cities to incorporate this type of transportation into its planning, *A New Planning Template for Transit Oriented Development, Mineta Transportation Institute, 2001*. HELP has given the City multiple copies of the 2001 Study and HELP and CCLA have again provided another copy with respect to The Mobility Plan 2035.

- Comes to grips with the emergence of the Internet economy, widely deployed microcomputers, ubiquitous personal communications, and other likely technology expansions over the next five years, and the decades beyond. The rise of the network economy is already a distinctive feature of the present era. **The ubiquitous presence and use of computers and telecommunications is not yet mentioned in very many Metropolitan Transportation Plans, yet already is producing impacts on transportation.** The routine use of cellular phones in cars is increasing the value of time alone in a moving automobile, for example. The continuing growth in small package delivery services in urban areas is another example, along with the announcement of billions of dollars in warehouse construction by firms selling goods on the Internet. The growing impacts from online selling on particular categories of retail businesses — bookstores, automobile dealers, and travel agencies—is a third illustration. *Mineta Page 76*

Technology has progressed greatly since 2001 and it is imperative that The Mobility Plan 2035 study the impact of Virtual Presence.

## **16. Overall Summary**

The data on which The Mobility Plan 2035 rests is fatally flawed and almost all the ideas for Bike Lanes are wishful thinking with no consideration of the likely “unforeseen complications.” In reality, many “unforeseen consequences” are not seen because planners close their eyes to the obvious. The Mobility Plan 2035 is guilty of this myopia in the extreme and now is the time for The City to stop moving in this direction and to send back the Mobility Plan 2035 to begin from scratch. Ironically, this is the exact advice which HELP gave the City with respect to the Hollywood Community Plan and which CCLA gave to the City with respect to The Target Project at Sunset and Western.

Respectfully submits

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Citizens Coalition Los Angeles [CCLA]  
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