

July 26 2012



David Somers, Citywide Section
Department of City Planning
200 N. Spring Street, Room 667
Los Angeles, CA 90012

**Re: Case Number ENV-2012-1470-EIR
Comments re Notice of Preparation and Scoping for Bike Plan EIR
Colorado Boulevard**

Dear Mr. Somers:

Take Back the Boulevard (TBTB) submits the following comments regard the Notice of Preparation of an Environmental Impact Report (EIR) for the 2010 Bicycle Plan. Our comments focus on Colorado Boulevard.

Take Back the Boulevard is a community-driven initiative to make Colorado Boulevard more of a "main street" for Eagle Rock. TBTB's steering committee includes representatives from the Eagle Rock Neighborhood Council (ERNC); The Eagle Rock Association (TERA); the Eagle Rock Chamber of Commerce; Eagle Rock Community Preservation and Revitalization Corporation (ERCPR); Collaborative Eagle Rock Beautiful (CERB); and Occidental College. Our goals include: providing safety for all ages and various modes of transportation; stimulating economic growth through greater pedestrian activity and reduced automobile speeds; and increasing community health through reducing automobile emissions and encouraging alternative forms of transportation.

Over the past year, TBTB has used broad community involvement and feedback to develop plans to make Colorado Boulevard a safe, sustainable and vibrant street. We have conducted three community meetings, attended by more than 200 people; held more than a dozen smaller meetings with key stakeholders, including local schools, churches and businesses; and obtained more than 270 responses to a survey.

Our planning efforts have demonstrated wide community support for Class II bicycle lanes on Colorado Boulevard—buffered where feasible—between the Glendale City limit (near the 2 Freeway) to the Pasadena City Limit (near Avenue 64). On Colorado Boulevard, bicycle lanes would serve multiple purposes:

- (a) making the street safer for bicyclists, including by reducing automobile-bike conflicts that occur when modes that travel at markedly different speeds share lanes. This is particularly important on Colorado Boulevard, where many motorists are transitioning on or off the Glendale and Ventura Freeways;
- (b) making the street safer for pedestrians. On much of Colorado’s length, the street is nearly 100 feet wide, with three automobile travel lanes in each direction. The roadway width and number of lanes make it uncomfortable and unsafe for pedestrians to cross Colorado. Replacing an automobile lane with a bicycle lane can effectively reduce pedestrian crossing distance and crossing time.
- (c) making the street safer for motorists. Colorado Boulevard through Eagle Rock has a significantly higher traffic fatality rate than Colorado Boulevard through Glendale or Pasadena. With six travel lanes and fairly low levels of traffic at most times of day, Colorado Boulevard has significant excess capacity, which facilitates speeding. Converting an automobile lane to a bicycle lane allows law-abiding drivers, rather than speeders, to set the effective speed on the street.
- (d) enhancing the economic vibrancy of Colorado Boulevard businesses by creating a more pleasant environment for their customers.

Some Eagle Rockers have reserved judgment about bicycle lanes on Colorado Boulevard until this EIR analyzes the potential environmental effects. Based on input from the Eagle Rock community, Take Back the Boulevard requests that the EIR analyze the following topics and issues:

1. The EIR Should Be Specific About Potential Traffic Congestion Impacts

Along the 3-mile length of Colorado Boulevard through Eagle Rock, different segments have very different traffic volumes, roadway widths, and other characteristics. The EIR should be precise about the segments where traffic congestion might occur; and it should be precise about the time periods when those impacts are projected to occur. Our preliminary analysis, and observations as long-time Eagle Rockers, suggests that any increased traffic congestion is likely to occur only at a small number of intersections for short periods of time. If the EIR identifies bottlenecks, that information provides an opportunity to design bike facilities that address those specific locations.

2. The EIR Should Not Assume That Traffic Congestion Is An Inherently Adverse Impact.

Today, Colorado Boulevard is designed primarily for moving motor vehicles rapidly through Eagle Rock. Colorado Boulevard is not designed for bicyclists or pedestrians. While automobiles are and likely will remain the dominant mode on Colorado Boulevard, the EIR should not focus solely on

automobile Level of Service (LOS). The EIR should use a multi-modal LOS to better evaluate whether any increase in automobile congestion is offset by improvements to the manner in which Colorado Boulevard serves bicyclists, pedestrians and transit users.

The primary concern raised by Eagle Rockers in our meetings and surveys was excessive traffic speeds on Colorado Boulevard. Speeding traffic has several negative effects. It creates a perception that it is unsafe to cross Colorado, which in turn discourages walking and bicycling. Pedestrians' inability to easily cross Colorado makes it difficult to fully utilize on-street parking; people won't park on the other side of the street to patronize local businesses. Although Colorado Boulevard has some cafes and restaurants with sidewalk dining, speeding traffic creates a less comfortable environment.

Eagle Rock also has several schools on or near Colorado Boulevard, including Eagle Rock Elementary, Dahlia Heights Elementary, St. Dominic's Catholic School, Renaissance Arts Academy (RenArts), and a Montessori School. Speeding traffic discourages walking and biking to school, and makes student drop-off and pick-up more difficult.

To the extent that increased traffic congestion primarily reduces speeding rather than significantly delays those driving at the posted speed limit, that is a beneficial impact that ameliorates existing health and safety issues, and not an adverse impact.

3. The EIR Should Discuss the Angled Parking Alternative

As with most successful commercial districts in older parts of Los Angeles, there is some community concern about whether the amount of on-street parking is sufficient. Among Eagle Rockers, removal of on-street parking, particularly between El Rio and Dahlia, is likely to be viewed as a more significant impact than removal of a travel lane.

There is some community support for adding angled parking along Colorado Boulevard, and concern that bike lanes would preclude this alternative. TBTB understands that LADOT has undertaken previous analyses showing that: (a) on segments with an existing median (from Eagle Rock Boulevard to Townsend), angled parking cannot be installed that meets LADOT standards for the "E" dimension (the backup zone) without reconstructing the median; and (b) on other segments, angled parking would gain only a small number of on-street spaces. Discussion of angled parking in the EIR as an alternative would "foster informed decision-making and public participation" in Eagle Rock. If angled parking is infeasible with or without bike lanes, the bike lanes themselves have no impact on parking. Conversely, if there is a choice between bike lanes and angled parking, the community is entitled to that information and analysis.

4. The EIR Should Analyze Bike Lanes on La Loma as an Alternative to Mitigate Potential Impacts

The segment of Colorado Boulevard between Figueroa Street and La Loma Road/Monte Bonito Drive is relatively narrow; it is currently configured with two travel lanes in each direction and no curb parking. Class II bike lanes would likely require removal of at least one travel lane. If it is determined that this would create a significant environmental effect, the EIR should analyze the alternative of installing bike lanes on La Loma Road between Colorado and Figueroa. The businesses on this very short stretch of roadway are a CVS Pharmacy, McDonald's restaurant and Von's grocery store, all of which have ample off-street parking. Here, loss of on-street parking here likely would not have a significant adverse effect.

5. The EIR Should Address Safety Issues Relating to the 134 Freeway Ramp

The current design and signal timing of the 134 Ventura Freeway off-ramp onto westbound Colorado Boulevard allows vehicles to exit the freeway at high speeds. This physical condition creates an existing safety hazard for bicyclists, pedestrians and motorists. The EIR should evaluate whether installation of bike lanes would provide a safety benefit by reducing the length of the nearly ¼ mile merge lane. The EIR should also address whether other design or operational changes (such as changing traffic signal timing for vehicles exiting the freeway) could provide a safety benefit. TBTB's community outreach revealed that, regardless of how people felt about bike lanes, there was near-universal support for making it more difficult for vehicles to exit the 134 Ventura Freeway at high speeds onto Colorado Boulevard.

6. The EIR Should Focus on Key Segments Where Impacts Road Configuration Makes Traffic Impacts More Likely.

Along most of Colorado Boulevard in Eagle Rock, the right of way is 100-120 feet, making it relatively easy to design Class II bike lanes and predict any traffic impacts. However, some portions of Colorado Boulevard are relatively narrow, which presents design challenges and increases the likelihood that bike lanes will present adverse impacts. The EIR should more analyze specific design alternatives to maximize bicyclist safety and minimize traffic impacts at the following specific locations:

(a) westbound Colorado between Sierra Villa and the Colorado-Broadway split, to determine whether the existing four-lane configuration is necessary and, in any event, how to permit bicyclists proceeding along Colorado Boulevard to safely cross the significant volumes of traffic turning right onto Broadway;

(b) both sides of Colorado from Monte Bonito/La Loma to Wiota Street (near the 134 on- and off-ramp).

(c) eastbound Colorado at Sierra Villa, where there are large volumes of right-turning traffic into Eagle Rock Plaza

(d) eastbound Colorado at Eagle Rock Boulevard, where there are large volumes of right-turning traffic.

7. The EIR Should Analyze The Importance of a Connected Bicycle Network

Bicycle lanes offer the greatest benefit when they are part of a connected network of bicycle facilities. Along Colorado Boulevard, that means connecting not only to the City of Los Angeles' bicycle network—including existing bike lanes on Eagle Rock Boulevard and potential bike lanes on Figueroa—but also the bicycle facilities in Pasadena to the east and Glendale to the west. Pasadena's 2011 Bicycle Transportation Plan calls for Class II bicycle lanes along Colorado Boulevard, with a Class III bike route on the narrower roadway just east of the Pasadena-Los Angeles city limit. Glendale has an existing Class III bike route on Lincoln Avenue, which intersects with Colorado Boulevard just west of the Los Angeles-Glendale city limit; Glendale's May 2012 Final Draft Bicycle Transportation Plan calls for a Class III bike route, with sharrows, on Broadway. The EIR should analyze whether a failure to connecting to these other cities' networks—maintenance of the status quo—creates adverse impacts.

Take Back the Boulevard appreciates this opportunity to provide input regarding the EIR. We offer our assistance to the Planning Department and the Department of Transportation in conducting outreach regarding this or future phases of the EIR process. If you have any questions, please contact either Bob Gotham of The Eagle Rock Association at president@TERA90041.org; or Jeff Jacobberger of Civic Enterprise Associates, at jeff@civicerprise.com or 323.646.3308.

Very truly yours,



Bob Gotham, Chair
Steering Committee, Take Back the Boulevard

cc: Jeff Jacobberger, Civic Enterprise Associates (by email)
Office of Councilmember José Huizar (by email)