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December 15, 2014

The Honorable Herb J. Wesson, President
Los Angeles City Council
200 North Spring Street
Los Angeles, California 90012

**Proposed Applications to Metro 2015 Call for Projects
Lack of Consistency with Los Angeles General Plan
CF# 14-1680**

Dear President Wesson and Council Members,

The Los Angeles County Bicycle Coalition (LACBC) is generally supportive of the list of proposed projects to apply in Metro's 2015 Call for Projects. Overall, the list represents a city that is forward-thinking and developing projects that are consistent with complete streets and LADOT's new Vision Zero goal to eliminate all traffic fatalities in the city by 2025. LACBC particularly appreciates the emphasis on protected and low-stress bikeways, as well as the incorporation of complete streets into the RSTI and Goods Movement projects.

Unfortunately, LACBC must also point out one project that is glaringly inconsistent with the draft Mobility Plan 2035 and adopted 2010 Bicycle Plan, both of which were supposed to be screening criteria for the project list. The "North Figueroa Great Streets Corridor – Phase 1" project (Ped Improvements #1, page 5) is located along the Bicycle Plan's Backbone Network as well as the Mobility Plan's Bicycle Enhanced Network. The Backbone Network is characterized by Class II bike lanes while the Enhanced Network is designated to include protected bike lanes. Neither of these bikeway types is included in the proposed project scope on North Figueroa. These inconsistencies leave the project subject to CEQA challenge, if awarded funding.

Metro's new Complete Streets Policy defines complete streets as those that serve "all categories of users, including pedestrians, users and operators of public transit, bicyclists, persons with disabilities, seniors, children, motorists, users of green modes, and movers of commercial goods...within an integrated transportation network." Metro will evaluate individual projects against those city planning documents that define the layered, multi-modal transportation network—namely the draft Mobility Plan's enhanced networks for transit, bicycles and vehicles. This project, which proposes to reconstruct curbs and pavement without incorporating the bikeway required by the city's transportation plans, is unlikely to comply with this policy.

North Figueroa is the heart of Highland Park's historic business district and also a key facility in the citywide bikeway network, which is only as useful as the sum of its parts. These improvements would be highly complementary—bicycle improvements have been shown in cases from across the country, indeed the world, to promote vibrant local retail districts. The available local data suggests North Figueroa is primed for growth in bicycle ridership. In fact, the street already has



among the highest bicycle use of any street in Northeast Los Angeles—higher even than streets that already have bike lanes. Unfortunately on Figueroa, approximately half of these bicyclists are currently riding on the sidewalk through the business district. This is an unsafe condition for both the people riding and the people walking in and out of the many local shops that line Figueroa, which this project would only exacerbate as it makes an already unsharable street even narrower with diagonal parking.

It would be inappropriate for the city to spend limited resources securing funding for projects that are not consistent with the city's own plans. This project's failure to incorporate planned complete streets elements threatens to undermine the careful compromises at the foundation of the Mobility Plan's multi-modal networks, which tempered the ambitions of the Bicycle Plan by focusing on a much more limited network of higher quality infrastructure. The citywide significance of this issue is made all the more evident by the citywide response from your constituents included in this council file.

Everyone agrees that North Figueroa is in critical need of improvements. LACBC has worked extensively with community stakeholders to advance safety improvements for the entire length of North Figueroa for half a decade, participating in every planning process and project development workshop. LACBC would be proud to support a project in this location that respects the community's vision of a "Figueroa for All" and truly serves all who live, work and visit Highland Park. Until this project is re-scoped to align with this inclusive vision and to be consistent with the City's general plan, LACBC is compelled to register its opposition to the project with both the City and Metro. LACBC encourages the City to remedy these issues by including the missing project elements or removing this project from the Call for Projects application list.

If you have any questions about these concerns, I can be reached at (213) 629-2142, ext. 127. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Bruins", is positioned above the printed name.

Eric Bruins
Planning & Policy Director