



losangeleswalks.org

hello@losangeleswalks.org
213-219-2483
800 Wilshire Blvd., Suite 200
Los Angeles, CA 90017

October 13, 2020

Los Angeles County Metropolitan Transportation Authority
Elizabeth Carvajal, Senior Director
Countywide Planning & Development
One Gateway Plaza, Mail Stop 99-23-4
Los Angeles, CA 90012-2952

Subject: SC# 2016121064 Los Angeles Union Station Forecourt & Alameda Esplanade Improvements Project, EIR Addendum #2 (Addendum #2)

Dear Ms. Carvajal,

In our April 26, 2019 Letter of Support for changes requested by Metro last year to the Alameda Esplanade/LA Union Station Forecourt/Los Angeles Crossing project (The Project), Los Angeles Walks made clear that while we supported the project overall, we had substantial concerns about certain design decisions which had been determined, most specifically the narrowing of the proposed sidewalk on the west side of Alameda and the inclusion of a protected right-turn lane from northbound Alameda into Union Station. While we understood the decision to narrow the west Alameda sidewalk was made due to substantial cost considerations, we still asked that scope changes service the goals of the project, and frankly, we simply chose to tolerate a protected right-turn from northbound Alameda into Union Station (and a right-turn lane for northbound Alameda onto Cesar Chavez) as a final good-faith compromise with vehicular access to Union Station based on the rest of the project as presented.

As reiterated in Addendum #2, Section 4.1.2, The Project seeks to provide improved pedestrian and bicycle mobility options at a location that links Los Angeles' central transit hub with one of its key cultural resources. The project is a key component of the Union Station Master Plan and the Connect US Action Plan to improve local and regional travel within Southern California. Union Station currently sits as a transit "island", isolated from El Pueblo, Chinatown, and Downtown Los Angeles by unsafe roadways. The Project was initiated to correct this inequitable and unsustainable condition by transforming Union Station's immediate surroundings to empower vulnerable road users and non-vehicular access.



Unfortunately, despite the years of engagement between Metro and community members, further changes included in The Project as shown in Addendum #2, Figure 3 (but in some cases not fully documented) have eroded and subverted the core Project Objectives (Addendum #2, Section 4.1.2) to the point where we cannot support the Project as presented. Key among these deleterious changes are 1) the reduction in quality of the pedestrian experience, 2) the prioritization of vehicular convenience and capacity over pedestrian convenience and capacity, and 3) the compromise of features aimed at improving accessibility.

Sadly, while none of the “requisite objectives” for the Project mentioned in Section 4.1.2 have any mention of encouraging vehicular throughput or tolerating or accommodating bad driving behaviors, the modifications included in Addendum #2 do exactly that.

As such, Metro should fully document any proposed modifications and study their impact in relation to CEQA, and also, almost more importantly, to the stated Project Objectives.

- Modification #1: Incorporation of vehicular left turns across “Los Angeles Crossing” and related changes to pedestrian signal timing (Not fully documented in Addendum #2)
- Modification #2: Reduced raised crossing height from flush to non-flush at “Los Angeles Crossing” (Not documented in Addendum #2)
- Modification #3: Reduced width of “Los Angeles Crossing” and elimination of direct accessible path between Union Station and El Pueblo (Not documented in Addendum #2)
- Modification #4: Reduction of shade trees along “Alameda Esplanade” (Not documented in Addendum #2)

Los Angeles Walks objects to these modifications for the following reasons among others:

- Modification #1: The ostensible reason given by Metro on the advice of the Los Angeles Department of Transportation (LADOT) to include a left-turn lane from eastbound Los Angeles St to Alameda St is that they are worried about driver non-compliance with the left-turn prohibition and that drivers will take illegal left-turns. Besides being presented



without evidence or findings to support the claim, we are frustrated and saddened by the “solution” to introduce an exclusive left-turn phase which will eat into the pedestrian and bicycle phase crossing Alameda Street at Los Angeles Crossing. If non-compliance is anticipated, there are other ways to seek to counter such behavior including, but not limited to: more signage including advance warnings south on Los Angeles St; non-ticketing education operations; and working with state legislative leaders for an automatic-enforcement solution at the intersection. Introducing the left-turn lane to “protect” people walking and biking is an Orwellian cutting of the Project’s nose to spite its face. Why design *for* scofflaw drivers?;

- Modification #2: Throughout the Active Transportation Program application process and afterwards, the central component of Los Angeles Crossing, the raised crosswalk, was presented as something feasible by the traffic consultants and LADOT. If there is a specific engineering reason to reduce the height of the raised crossing from a flush-with-the-sidewalk 8” to the proposed 3”, we can’t seem to find it but would assume that it has to do with anticipated prevailing speeds on Alameda. This Project was presented as transformative; a project that would drastically alter the unsafe and forbidding status quo at Los Angeles Crossing and directly connect El Pueblo to Union Station and unify the twain. If it is indeed the case that the anticipated speed of Alameda or some other factor is leading the team to propose a lower height, we ask that Metro work with relevant City agencies to *change the factors that would lead to such a conflict*. In other words, if people drive too fast on Alameda St, then Metro should work with the City to *calm the street appropriately* in the expanded project area;
- Modification #3: The reduced width of Los Angeles Crossing from 50’ to 37’ is unacceptable and needs to be restored. The reduction in width eliminates the direct accessible path-of-travel between Union Station’s accessible entrance and the proposed accessible ramp for El Pueblo and, rather than provide a wide ample space for crossing by people walking, biking, scooting, and rolling, would restrict that space. Without documentation, we cannot determine exactly why this recommendation is being made by Metro and LADOT, and must assume that, similar to the reduction in the height of the raised crossing, it derives from an outside “constraint” that is an indication of unsafe driving that the City and Metro should seek to address rather than compromise the Project or an engineering consideration such as vehicular capacity that is not being



described;

- Modification #4: We write this letter during a two-week heatwave in Southern California. Shade is not only an “enjoyable” benefit, it is now crucial in all public and private open space design. Removal of the “double line” of trees would dramatically reduce the shade cover for people walking, biking, or resting--crucially, people not in air-conditioned vehicles. While shade structures may also be a possibility here (and one that we urge Metro to consider if they choose to maintain the reduction in shade trees) there are also attendant benefits to trees specifically, most notably air quality improvements.

At this important location, Metro should be prioritizing improvements that improve access for all, regardless of abilities, age, or access to a car.

Overall, this process is indicative of a few issues that rear their ugly heads over and over again in the City of Los Angeles. Stated City plans and guidelines that seek to prioritize and protect vulnerable road users are not followed, and therefore project goals that usually share those same guiding principles are eroded or disregarded. In this case, there are numerous modifications shown in Addendum #2, Figure 3, but not included in Addendum #2 but not included in the summary itself that have subverted the stated Project Objectives.

The result? This project is fundamentally inconsistent with the adopted Mobility Plan 2035, the Connect US Plan, the ATP applications for both projects, and the wide community input that developed all of these plans and projects.

Sincerely,



John Yi
Executive Director
Los Angeles Walks

