



August 19, 2020

Mr. Scott Hartwell
Project Manager
Los Angeles County Metro

via email

Re: North Hollywood to Pasadena Bus Rapid Transit Corridor Project Conditions

Dear Mr. Hartwell,

As the Noho-Pasadena BRT approaches the Draft Environmental Impact Report (DEIR) phase, The Eagle Rock Association (TERA) would like to reiterate the elements that must be accounted for in order for our organization to consider supporting the project. We hope that all options that Metro proposes to the Eagle Rock community will incorporate all these items:

- 1) **Quality Service for Eagle Rock:** A scheme that bypasses Eagle Rock will provide no benefits to residents, employers, or visitors. Therefore, it is essential that all options presented serve the Eagle Rock community.
- 2) **Consistency with Take Back The Boulevard Initiative:** Take Back The Boulevard (TBTB) is arguably TERA's most prominent initiative of the past decade. We spent three years developing a community process that engaged a broad spectrum of residents and businesses that culminated in the TBTB Vision Plan. We do not believe BRT is inherently inconsistent with the Vision Plan, but Metro must make a special effort to respect this vision and components of the plan that have received funding. Any proposal that substantially strays from the TBTB Vision Plan will be met with our opposition.
- 3) **Maintain or Enhance Existing Bicycle Infrastructure:** The first phase of TBTB involved the addition of bike lanes to Colorado Boulevard. We recognize that street space is limited and that the existing Class II bike lanes may need to be

modified. However, we insist any changes imposed by BRT maintain Class II bike lanes or enhance them to Class IV bikeways. Any option that entirely removes bike lanes or requires bikes and buses to share a lane will be met with TERA's opposition.

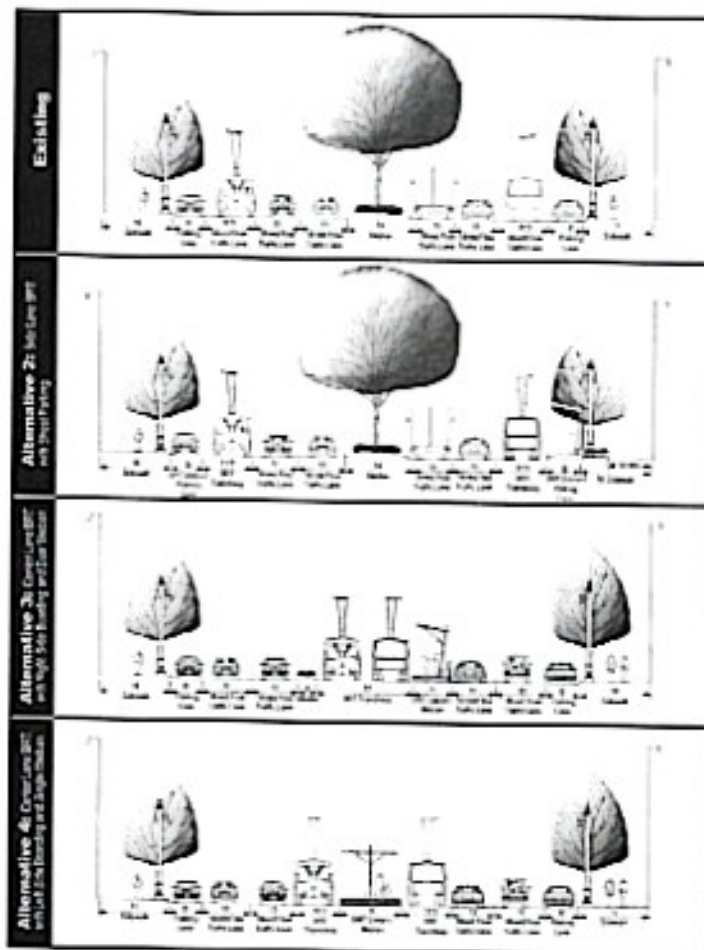
- 4) **Maintain Landscaped Medians:** We recognize the limited right-of-way on Colorado Boulevard creates constrained conditions for BRT implementation. Just as with the bike lanes, we acknowledge that existing medians may need to be narrowed or modified to accommodate BRT. However, simply put, TERA will oppose any proposal that eliminates landscaped medians. Landscaped medians on Colorado Boulevard reduce the scale of a wide public right of way, provide greenery within an urban context, and reduce pedestrian crossing distances. TERA is not opposed to adjusting existing medians to better serve a vibrant, green, and multi-modal boulevard. But TERA considers wholesale removal of medians or a scheme that transforms Colorado Boulevard into a freeway-like street as unacceptable.

- 5) **Maintain Street Parking:** The reason Colorado Boulevard has blossomed into a thriving main street for Eagle Rock is in large part due to the 1992 adoption of the Colorado Boulevard Specific Plan. The Specific Plan empowered small businesses by limiting the requirement to provide off-street parking in the adaptive reuse of existing buildings. As such, our businesses generally have limited on-site parking options outside of those available on public streets. This reduction in required on-site parking has allowed additional businesses to spring up and limited the blight of creating additional surface parking lots or costly parking structures. With this reality, the existing street parking supply is valuable and essential towards sustaining vehicular access to businesses. Understandably, a limited number of parking spaces may need to be re-purposed near potential BRT stations. However, TERA will oppose any proposal to fully remove parking on either side of Colorado Boulevard and which ignores our community's context-sensitive needs.

To help the project team develop viable alternatives within the Eagle Rock portion of the BRT route, we would like to offer the following suggestions and considerations:

- **Look to Other BRT Projects:** While the constraints and infrastructure being considered along Colorado Boulevard might be new to Los Angeles, they are not unique. For example, Van Ness Boulevard in San Francisco has already gone through the California environmental process to add BRT to the corridor. Van

Ness Boulevard is generally 93 feet wide curb-to-curb and therefore makes for an appropriate comparison to Colorado Boulevard (which is generally 94 feet wide between Sierra Villa Drive and Eagle Rock Boulevard and 96 feet wide between Eagle Rock Boulevard and Townsend Avenue). The BRT lanes are proposed to be 10.5ft wide on Van Ness Boulevard and are currently under construction. This project provides an important reference of a people-centered street for how a BRT project could be implemented within Eagle Rock.

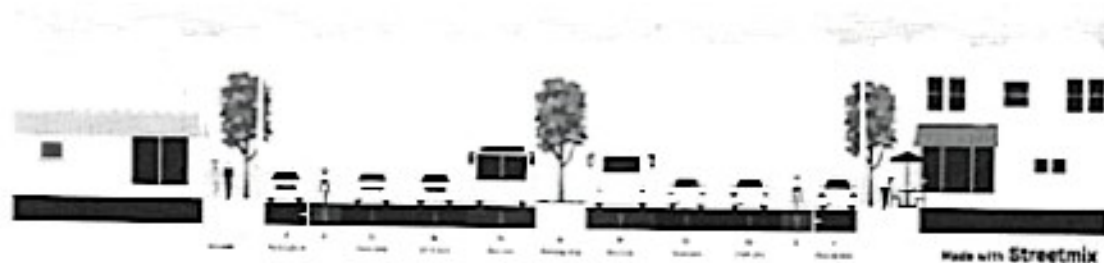


Design alternatives for the Van Ness BRT project in San Francisco. Note the bus lanes are shown as 10.5 foot wide in Alternative 4.

- Use Innovative Design Solutions:** Using StreetMix, TERA has compiled the following example cross-sections that balance the competing needs along Colorado Boulevard. These cross-sections generally conservatively assume a 94ft curb-to-curb width, so these are ideas offered under the more constrained conditions west of Eagle Rock Boulevard, knowing that there are an additional 2 feet available east of Eagle Rock Boulevard. While the below renderings should

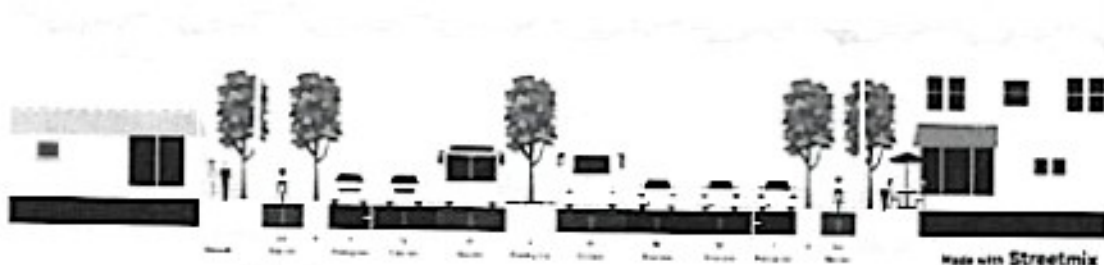
not be read as TERA endorsing any specific cross-section, they highlight how creative and innovative solutions may exist to accommodate dedicated bike infrastructure, medians, and on-street parking all at once. TERA believes that options between being forced to lose parking, medians, or dedicated bike lanes are a false choice. The Eagle Rock community should be granted an opportunity to consider and give feedback on a range of options that maintain all the key elements that make Colorado Boulevard a vibrant street.

Colorado Blvd BRT Concept A



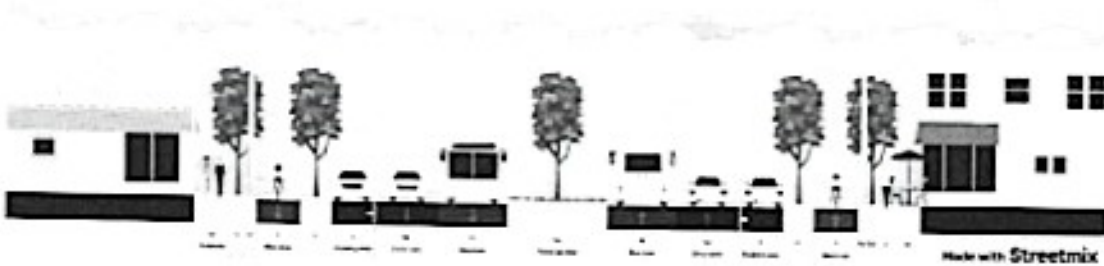
Section shown at narrower area of right-of-way

Colorado Blvd BRT Concept B



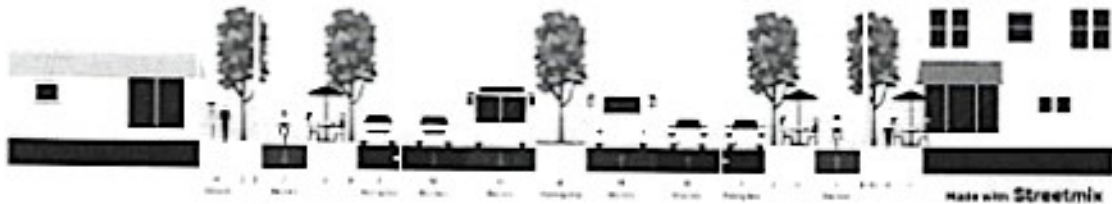
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Colorado Blvd BRT Concept C



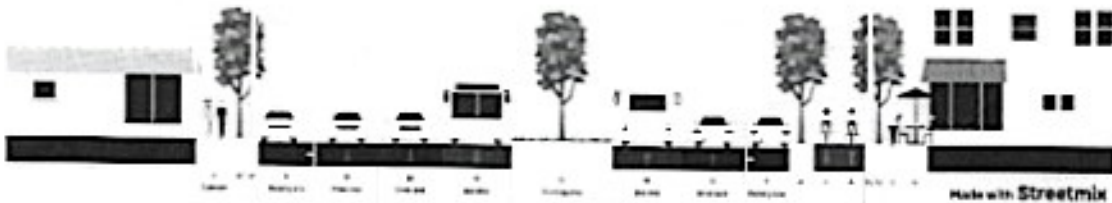
Section shown at location of existing median

Colorado Blvd BRT Concept D



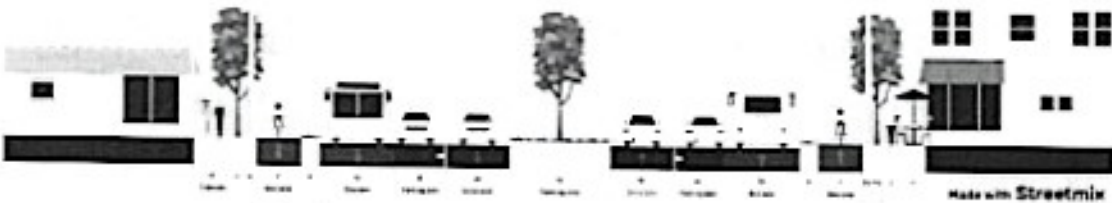
Section shown at narrower area of right-of-way

Colorado Blvd BRT Concept E



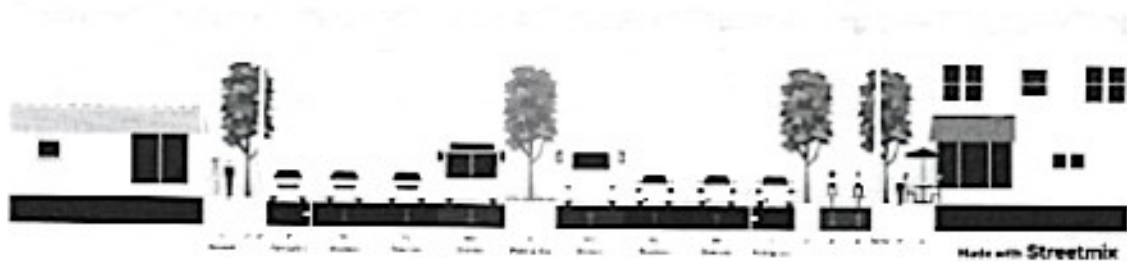
Section shown at location of existing median

Colorado Blvd BRT Concept F



Section shown at location of existing median

Colorado Blvd BRT Concept G



Section shown at narrower area of right-of-way

- Consider Buses that Accommodate Driver-Side Boarding:** BRT systems across the country are increasingly utilizing buses that allow for driver-side boarding to improve the customer experience. Metro must consider incorporation of innovative bus design for the Noho-Pasadena BRT project. Recently implemented examples of buses that provide driver-side boarding in addition to traditional curbside boarding include Oakland AC Transit BRT, Cleveland HealthLine BRT, and Albuquerque Regional Transit (ART).



Source: Oakland AC Transit

- **Use Narrow Vehicular Travel Lane Widths:** Oftentimes there is an impulse at an early stage of design to use wide travel lanes that are 11 to 12 feet wide as a standard that incorporates a conservative margin of error. However, in constrained conditions, it is acceptable to use narrower lane widths. Consider that mere blocks away from the Colorado Boulevard corridor, our community's other major street, Eagle Rock Boulevard between Fair Park Avenue and Westdale Avenue, has travel lanes that are 9.5ft and 10.5ft. These lane widths were introduced in 2013 to accommodate bike lanes on Eagle Rock Boulevard. In the seven years since travel lanes were narrowed on Eagle Rock Boulevard, there has been no noticeable increase in traffic collisions. Therefore, we believe it should be acceptable to consider lane widths that range from 9.5ft to 10.5ft along Colorado Boulevard to accommodate necessary uses and discourage speeding.

We note dozens of streets throughout the City function well with lane widths narrower than 11 feet. In addition to narrow travel lanes, it is common to encounter left and right turn lanes that are as narrow as 9ft wide. If narrower lane widths are sufficient for major streets in other parts of the City, they should be good enough for Eagle Rock.

Sources like the National Association of Transportation Officials (NACTO) state that the minimum lane width for bus lanes may be 11 feet, though the literature on BRT suggests that constrained conditions in urban settings (like Eagle Rock) that lane widths can be 10.5 feet wide. When there are various needs that must be satisfied, it is important to distinguish between a desired lane width to achieve functional and safety goals and the standard to be used as a baseline. For the purpose of achieving a safe, multi-modal condition on Colorado Boulevard, narrower may be better.

In conclusion, TERA believes there is a viable path forward for this project that can benefit the community, but it will require focused attention and collaboration. Offering incomplete design options—or design schemes that ignore the feedback that Eagle Rockers have offered—are not productive or conducive towards achieving widespread community buy-in. TERA is eager to support Metro in its efforts to build a more equitable and efficient transit system. But TERA will not support a project that does not incorporate quality transit service, quality pedestrian infrastructure, quality bicycle infrastructure, plentiful landscaped medians, and street parking to support existing

businesses within Eagle Rock — the central priorities that the Eagle Rock community has consistently communicated for this project.

Sincerely,



Greg Merideth
President

Attachment

cc: Martin Reyes, Office of County Supervisor Hilda Solis
Dan Rodman, Office of Mayor Eric Garcetti
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Jennifer Barraza, Office of Councilmember-elect Kevin de León
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