Contents

Acronyms and Abbreviations

Acronym/Abbreviation	Definition
Bicycle Master Plan	County of Los Angeles Bicycle Master Plan
CEQA	California Environmental Quality Act
County	County of Los Angeles
ESHA	Environmentally Sensitive Habitat Areas
General Plan	County of Los Angeles General Plan
GHG	Greenhouse gas
LACDPW	County of Los Angeles Department of Public Works
LOS	Level of Service
NEPA	National Environmental Policy Act
NOP	Notice of Preparation
PEIR	Program Environmental Impact Report
Plan	County of Los Angeles Bicycle Master Plan
SEA	Significant Ecological Areas
VMT	vehicle miles traveled

Chapter 1 | Introduction and Revisions to the Draft PEIR

1.1 Introduction

The County of Los Angeles Department of Public Works (LACDPW) has prepared this Final Program Environmental Impact Report (Final PEIR) for the *County of Los Angeles Bicycle Master Plan* (also referred to as the "Bicycle Master Plan," the "Plan," or "proposed project") (Alta Planning + Design 2011; herein incorporated by reference). In accordance with Section 15132 of the California Environmental Quality Act (CEQA) Guidelines, this document includes:

- The Draft PEIR, incorporated by reference and revised as discussed in this chapter (Chapter 1).
- Comments received on the Draft PEIR and responses to each comment (Chapter 2).
- Additional information related to the PEIR, included as appendices.

1.1.1 Background

The existing *Plan of Bikeways* for the County of Los Angeles was adopted in 1975 and amended in 1976 (Los Angeles County 1976). It is a component of the Transportation Element of the comprehensive *County of Los Angeles General Plan* (General Plan). The *Plan of Bikeways* consists of goals and policies, design standards, criteria for corridor selection, and implementation measures, along with mapping of bikeway corridor routes. It anticipated that each city within the County would adopt detailed feeder systems to supplement the County-wide network.

Currently, the Los Angeles County bikeway system includes approximately 144 miles of existing Class I bike paths, Class II bike lanes, and Class III bike routes. (For a definition of the bikeway types, see Chapter 2 of the Draft PEIR.)

1.1.2 Project Summary

The proposed Bicycle Master Plan would replace the 1975 *Plan of Bikeways*. The Plan was prepared by Alta Planning + Design for the LACDPW. The Bicycle Master Plan proposes a vision for a diverse regional bicycle system of interconnected bicycle corridors, support facilities, and programs to make bicycling more practical and desirable to a broader range of people in the County. It is intended to guide the development and maintenance of a comprehensive bicycle network and set of programs throughout the County's unincorporated communities for the next 20 years.

The Bicycle Master Plan would be a component of the Transportation Element of the General Plan, which is a long-range policy document that guides growth and development in the unincorporated portion of Los Angeles County. When the 2035 Los Angeles County General Plan Update is approved, the Bicycle Master Plan will be incorporated as a component of the Mobility Element.

The Bicycle Master Plan includes recommendations for an expanded bikeway network in unincorporated communities and along rivers, creeks, and flood control facilities throughout the

County. It outlines a range of recommendations to facilitate accomplishing the regional goals of increasing the number of people who bike and the frequency of bicycle trips; encouraging the development of Complete Streets (see Chapter 2 of the Draft PEIR for a description of the Complete Streets concept); improving safety for bicyclists; and increasing public awareness and support for bicycle-related programs.

The Draft PEIR evaluated the impacts of the Draft Bicycle Master Plan. Based on comments received from interested parties, including during the comment period for the Draft PEIR, the Plan was revised as discussed Section 1.2, "Revisions to the Draft PEIR," below.

1.1.3 Process

CEQA was adopted in 1970 to disclose to decision makers and the public the significant environmental effects of proposed actions. CEQA applies to all discretionary activities proposed to be carried out or approved by California public agencies. The proposed Bicycle Master Plan is a discretionary activity, so CEQA is applicable. Therefore, the County prepared an Initial Study to determine whether an EIR would be required for the proposed project, and if so, which environmental topics needed to be at addressed in the EIR. The Initial Study was distributed with a Notice of Preparation (NOP) on April 4, 2011 (see Section 1.4.1 and Appendix A of the Draft PEIR). Based on the Initial Study, the County determined that the Bicycle Master Plan may have a significant effect on the environment, and an EIR would be required.

A Draft PEIR was prepared to evaluate impacts and circulated for public review between August 9, 2011 and November 10, 2011. The Draft PEIR addressed the impacts of adopting the Bicycle Master Plan. It also identified the types of environmental impacts that would result from the implementation of the individual projects in the Plan. Mitigation measures and strategies were provided when potential significant impacts were identified. The Draft PEIR provided guidance for subsequent analysis of the various components of the Plan as individual projects. These project-level environmental evaluations may use the PEIR to provide general information and may supplement it (or tier off of it) to provide site-specific impact analyses.

The level of significance of impacts from individual projects and the applicability of mitigation strategies identified in the Draft PEIR will be evaluated at the project-level evaluations. For individual projects where no impacts would occur, no further environmental documentation will be required. For projects that would have less-than-significant impacts or where impacts would be reduced to less-than-significant levels through the mitigation provided in this PEIR, no further environmental documentation will be required. Initial Studies will be prepared for individual projects where further analysis is required to determine impacts. If an Initial Study shows that there would be no significant impacts requiring additional mitigation beyond what is included in the PEIR, the County will determine that the project is covered by the PEIR and no further environmental documentation is required. If the Initial Study shows that additional mitigation is required, and that this mitigation would reduce the impacts to a less-than–significant level, a Mitigated Negative Declaration will be prepared For projects that would result in significant environmental impacts, for which mitigation to reduce impacts to a less-than-significant level is unavailable or infeasible, project-level EIRs will be prepared.

During the review period for the Draft PEIR, a public hearing was held on September 15, 2011 at the Los Angeles County Hall of Records. During the review period, comments were accepted via mail and email, and on comment cards and orally at the public hearing. All of the comments received are included in Chapter 2 of this document, and information about the public review process is included in Appendix A.

The County of Los Angeles prepared the PEIR and is the lead agency under CEQA. For the most part, bikeways proposed in the Bicycle Master Plan are located within unincorporated portions of the County, or along rivers, creeks, and flood control facilities throughout the County. However, in order to provide connectivity, bikeways are proposed within other jurisdictions and may require subsequent oversight, approvals, or permits from these cities. These cities are referred to as "responsible agencies" under CEQA because they may also need to take discretionary actions related to Bicycle Master Plan. The responsible agencies can use this PEIR to support their decision-making process. Responsible agencies for this Draft PEIR are shown in Table 1-1.

Table 1-1. Responsible Agencies

Agoura Hills	Glendale	Long Beach	Rosemead
Arcadia	Glendora	Los Angeles	San Dimas
Azusa	Hawthorne	Malibu	San Gabriel
Calabasas	Huntington Park	Monrovia	Santa Clarita
Carson	Industry	Montebello	Santa Fe Springs
Commerce	Inglewood	Monterey Park	Temple City
Compton	Irwindale	Palmdale	Torrance
Covina	La Canada Flintridge	Paramount	Vernon
Culver City	La Mirada	Pasadena	West Covina
El Monte	La Puente	Pomona	Whittier
El Segundo	La Verne	Rancho Palos Verdes	
Gardena	Lancaster	Rolling Hills Estates	

Each of these agencies received notices of the Draft PEIR, and some provided comments during the public review period. Consistent with state law (Public Resources Code 21092.5), responses to agency comments were forwarded to each commenting agency at least 10 days prior to the last public hearing. (See Appendix B.)

1.2 Revisions to the Draft PEIR

1.2.1 Revisions to the Project Description

Revisions were made to the Bicycle Master Plan as a result of comments received from agencies and interested parties since its publication in February 2011. These revisions were to the list of projects in the Bicycle Master Plan, and included deletions, additions, and changes in types of bikeways. Table 1-2 lists the projects included in the Final Bicycle Master Plan, with changes shown in ~~strike-through text~~ for deletions and <u>underlined text</u> for additions. The revised network is displayed on two overview maps: Figure 1-1 displays the western portion of the County, and Figure 1-2 displays the

eastern portion of the County. (Note: Minor changes in the length and description of some bikeways may be made to the Bicycle Master Plan right up until its approval by the County of Los Angeles Board of Supervisors. These minor changes may result in slight differences between lengths and descriptions presented in the Bicycle Master Plan and those analyzed in the Final PEIR. These changes do not change the analysis or findings in this document.)

Table 1-2. Summary of Existing and Proposed Bikeways

Planning Areas	Existing Bikeways			Proposed Bikeways			
	Class I	Class II	Class III	Class I	Class II	Class III	Other
Antelope Valley	3.2	3.8	0.2	--	~~74.2~~ 95.9	~~107.8~~ 134.8	--
East San Gabriel Valley	7.5	7.6	9.4	~~25.1~~ 25.2	~~22.8~~ 31.0	~~25.6~~ 30.6	~~3.0~~ 4.3
Gateway	45.9	1.0	9.7	~~12.1~~ 5.7	~~19.4~~ 23.1	~~10.4~~ 12.0	--
Metro	--	2.3	--	0.6	~~41.4~~ 48.1	~~21.4~~ 26.9	~~12.1~~ 12.0
San Fernando Valley	--	1.5	--	2.2	~~0.9~~ 1.7	~~5.3~~ 7.5	--
Santa Clarita Valley	--	2.4	0.9	~~15.9~~ 16.5	~~29.1~~ 33.4	~~101.4~~ 108.5	--
Santa Monica Mountains	--	0.5	--	--	1.8	~~66.1~~ 93.8	--
South Bay	8.9	1.1	--	~~2.7~~ 9.2	~~12.5~~ 14.8	~~8.3~~ 9.6	~~—~~ 0.9
West San Gabriel Valley	23.3	--	2.6	~~8.0~~ 9.1	~~15.9~~ 17.1	~~28.5~~ 34.3	~~4.9~~ 5.2
Westside	11.5	--	0.7	~~2.5~~ 3.2	6.9	~~5.9~~ 5.6	--
Total Mileage	100.3	20.2	23.5	~~69.1~~ 71.8	~~224.6~~ 273.8	~~380.7~~ 463.6	~~20.0~~ 22.8

Changes in Final Bicycle Master Plan compared to Draft Bicycle Master Plan are shown as follows: ~~strike-though text~~ for deletions and underlined text for additions.

Source: Alta Planning + Design 2011b.

Due to the project changes, the following changes are made to the Draft PEIR's project description:

Section 2.6.2, Proposed Bicycle Network, paragraph 3:

Currently, the County maintains approximately 144 miles of existing Class I, II, and III bikeways. The Plan proposes an interconnected network of bicycle

corridors that adds approximately ~~695~~ 832 miles of new bikeways throughout the County that would enable residents to bicycle with greater safety, directness, and convenience within and between major regional destinations and activity centers. Table 2-2 summarizes the existing and proposed number of miles for each type of bikeway (previously described in Table 2-1) within each planning area in the County, with planning area boundaries defined in Figure 2-1.

1.2.2 Revisions to the Analysis in the Draft EIR

Although there have been numerous changes in the components of the Bicycle Master Plan since the analysis in the Draft EIR, these changes do not represent significant new information in the context of CEQA, specifically Section 15088.5 of the CEQA Guidelines. Under these regulations, a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the EIR for public review. "Significant new information" is defined by CEQA as one of the following:

- A new significant environmental impact that would result from the project or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact that would result unless mitigation measures are adopted that would reduce the impact to a less-than-significant level.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impact of the project, but that the project proponent has declined to adopt.

Recirculation is also required if the Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

For the Bicycle Master Plan Final PEIR, the revisions do not represent significant new information as defined above. No new significant environmental impacts would occur as a result of the project changes and no new mitigation is proposed. The severity of the impacts would also not increase; in fact, the impacts would all be reduced to a less-than-significant level by mitigation as proposed in the Draft PEIR and equally applicable to the project as defined in the Final PEIR. No project alternative or mitigation measure has been proposed that is different from those previously analyzed in the Draft PEIR. Finally, the Draft EIR was not fundamentally or basically inadequate or conclusory. The Draft PEIR and Final PEIR, taken together, address at a program level impacts that would occur due to the adoption of the Bicycle Master Plan and provide guidance for subsequent analysis of the various components of the Plan as individual projects in site-specific impact analyses in project-level CEQA documents, as discussed in Section 1.1.3, above.

The following revisions are made to the Draft PEIR as a result of the changes to the project description and to comments received as part of the public review process. Text added to the Draft PEIR is shown in underline format, and deleted text is shown in ~~strikethrough~~ format.

Section 3.1, Aesthetics/Visual Resources

Section 3.1.4.3, Impacts and Mitigation Measures

Impact 3.1-2: Be substantially visible from or obstruct views from a regional riding or hiking trail, Construction, paragraph 1:

The Plan proposes a total of ~~68.5~~ 71.8 miles of Class I bike paths, ~~183.5~~ 273.8 miles of Class II bike lanes, ~~359.3~~ 463.6 miles of Class III bike routes, and ~~7.9~~ 22.8 miles of bicycle boulevards throughout the Antelope Valley, East San Gabriel Valley, Gateway, Metro, Santa Monica Mountains, Santa Clarita Valley, San Fernando Valley, West San Gabriel Valley, Westside, and South Bay Planning Areas (Note: no off-road bikeways are proposed within the Antelope Valley or Santa Monica Mountains Planning areas, and no bicycle boulevards are proposed within the Antelope Valley, Gateway, San Fernando Valley, Santa Clarita Valley, Santa Monica Mountains, ~~West San Gabriel Valley,~~ or Westside Planning Areas). Construction of on-road bikeways would include minor road widening, pavement striping, painting of sharrows, and signage installation that would require the following temporary facilities: assembly areas, parking areas, and staging and laydown areas. Also, construction may require the use of some heavy equipment such as excavators, pavers, and water trucks. Construction activities and equipment would likely be visible from numerous regional riding and hiking trails throughout the planning areas listed above and would have the potential to obscure or completely block views during the construction period. However, construction would be temporary, would not occur all at once, and would not represent a significant portion of the overall viewshed of each planning area. As such, construction of the on-road bikeways would only temporarily be visible from or obstruct views from regional riding or hiking trails within the planning areas listed above. Impacts would be less than significant.

Section 3.1, Aesthetics/Visual Resources

Section 3.1.4.3, Impacts and Mitigation Measures

Impact 3.1-2: Be substantially visible from or obstruct views from a regional riding or hiking trail, Operation, paragraphs 1–3:

The Plan would include off-road and on-road bikeways within the East San Gabriel Valley, Gateway, Metro, San Fernando Valley, ~~and~~ Santa Clarita Valley, South Bay, West San Gabriel Valley, and Westside Planning Areas, as well as on-road bikeways within the Antelope Valley and Santa Monica Mountains Planning Areas (Note: no off-road bikeways are proposed within the Antelope or Santa Monica Mountains Planning areas, and no bicycle boulevards are proposed within the Antelope, Gateway, San Fernando Valley, Santa Clarita Valley, Santa Monica Mountains, ~~West San Gabriel Valley,~~ or Westside Planning Areas). Operation of these bikeways would

likely be visible from numerous regional riding and hiking trails throughout these planning areas.

Operation of the Plan would ~~also~~ result in the addition of approximately ~~68.5~~ 71.8 miles of Class I bike paths throughout the East San Gabriel Valley, Gateway, Metro, Santa Clarita Valley, San Fernando Valley, West San Gabriel Valley, Westside, and South Bay Planning Areas. Some of these Class I bike paths would be located along creek and river channels and along the beach and, in many cases, would be extensions of existing regional bicycle paths. Visible elements of the Class I bike paths would include additional paving, graded areas, new bridge construction, raised pathways, and signage. Adverse effects on existing views could occur where the Plan would create additional Class I bike paths adjacent to or within viewing distance of existing regional bicycle paths or hiking trails throughout the planning areas listed above if these new bikeways obstructed views or were incompatible with the existing views. Mitigation Measure MM 3.1-3 will require the County to design Class I bike paths in a manner that reduces the visibility and avoids obstruction of views available from regional trails.

Visible elements of the ~~183.5~~ 273.8 miles of Class II bike lanes, ~~359.3~~ 463.6 miles of Class III bike routes, and ~~7.9~~ 22.8 miles of bicycle boulevards would include additional pavement (through widening of existing roadways), striped pavement, sharrows, and signage. All of these bikeways would be installed along existing paved roadways and would be visually compatible with existing transportation infrastructure (i.e., traffic signage, roadway striping). Also, none of the aboveground features would be excessively large, substantially visible, or obstruct existing views available from established regional and hiking trails. Thus, no substantial changes to the existing visual environment would occur. As such, operation of the Class II bike lanes, Class III bike routes, and bicycle boulevards would have less-than-significant impacts on views available from regional riding and hiking trails through the planning areas listed above.

Section 3.1, Aesthetics/Visual Resources, Figures 3.1-1 through 3.1-4

Figures 3.1-1 through 3.1-4, showing the Bicycle Master Plan's relationship to the officially designated and eligible State and County scenic highways, are revised to include the revised Bicycle Master Plan. The new figures are at the end this chapter.

Section 3.2, Biological Resources, Figures 3.2-1 and 3.2-2

Figures 3.2-1 and 3.2-2, showing the Bicycle Master Plan's relationship to Significant Ecological Areas, are revised to include the revised Bicycle Master Plan. The new figures are at the end this chapter.

Section 3.2, Biological Resources

Section 3.2.4.3, Impacts and Mitigation Measures

Impact 3.2-1: Be located within a SEA, SEA Buffer, or coastal ESHA, or is relatively undisturbed and natural. Mitigation Measures, paragraph 1

The following change is made to clarify the introduction to the mitigation measures.

> Detailed analysis will be required prior to implementation of individual Bicycle Master Plan projects located within or adjacent to SEAs, SEA buffers, coastal ESHAs, or other relatively undisturbed or natural areas. If required, this ~~This~~ analysis will include a literature search conducted by a biologist with knowledge of the local biological conditions. Where appropriate in the opinion of the qualified biologist, the literature search will be supplemented with a site visit. Resources and information that will be investigated for each site should include, but not be limited to, the following:

Section 3.3, Hydrology and Water Quality

Section 3.3.4.3, Impacts and Mitigation Measures

Impact 3.2-2: Be located within a floodway, floodplain, or designated flood hazard zone. Mitigation Measures, paragraph 1

The following change is made to clarify the introduction to the mitigation measures.

> Detailed analysis of impacts related to floodways, floodplains, or designated flood hazard zones will be required prior to implementation of individual Bicycle Master Plan projects that include any construction within such areas. If required, this ~~This~~ analysis will include drainage studies that will calculate the additional flows per County hydrology manual standards.

Section 3.4, Cultural Resources, Figures 3.4-1 and 3.4-2

Figures 3.4-1 and 3.4-2, showing the Bicycle Master Plan's relationship to concentrations of California historical buildings, are revised to include the revised Bicycle Master Plan. The new figures are at the end this chapter.

Section 3.4, Cultural Resources

Section 3.4.4.3, Impacts and Mitigation Measures

Impact 3.2-1: Be in or near an area containing known archaeological resources or containing features that indicate potential archaeological sensitivity. Mitigation Measures, paragraph 1

The following change is made to clarify the introduction to the mitigation measures.

> Detailed analysis of impacts related to archaeological resources will be required prior to implementation of individual Bicycle Master Plan projects

that would include earthmoving or other ground disturbance. If necessary, these ~~These~~ project-level analyses will require that a qualified archaeologist conduct a literature and record search and a field survey of the project area. If archaeological resources are discovered, they will be evaluated for significance, through testing excavations if necessary.

Section 3.4, Cultural Resources

Section 3.4.4.3, Impacts and Mitigation Measures

Impact 3.2-2: Contains known historic structures or sites. Mitigation Measures, paragraph 1

The following change is made to clarify the introduction to the mitigation measures.

Detailed analysis of impacts related to historical resources will be required prior to implementation of individual Bicycle Master Plan projects that would be located near historical resources and where these projects would alter these resources or their context (such as for Class I bike paths, street widening, or removal of manmade structures or landscape features). If necessary, these ~~These~~ project-level analyses will require that a qualified architectural historian conduct a literature and records search, analyze appropriate inventories, and conduct a field survey of the project area to determine if significant historic resources are present. Significance would be determined by applying Section 15064.5(a) of the CEQA Guidelines and the California Register criteria.

Section 3.6, Traffic and Transportation

Section 3.6.4.3, Impacts and Mitigation Measures

Impact 3.6-1: Cause an increase in traffic that is substantial in relation to the existing traffic volumes and capacity of the roadway system (e.g., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections) or exceed, either individually or cumulatively, a LOS standard established by the County Congestion Management Agency for designated roadways or highways, Operation, paragraph 2 and Table 3.6-5:

Therefore, in general, the implementation of the Plan would result in reduced vehicular traffic volumes on roadways and improved traffic performances. However, some of the proposed Class II bike lanes would require the removal of one or more travel lanes. According to Table 5-2 of the Plan, ~~44.3~~ 71.3 miles of proposed bikeways may require travel lane removals, or "road diets." A list of potential road diet projects is presented in Table 3.6-5. Of these road diet locations, Firestone Boulevard between Central Avenue and Alameda Street is the only proposed bikeway classified as a CMP principal arterial.

These projects would involve vehicular travel lane reduction to add bike lanes and could potentially affect traffic operations and level of service at these locations. Therefore, the traffic operation impacts at these road diet locations are considered significant.

Table 3.6-5. Potential Road Diet Locations[1]

ID	Planning Area – Street Location	From	To	Miles
Antelope Valley				
11	40th St. West	Ave. K-4	Ave. M	1.7
6	Ave. L-8	65th St. West	60th St. West	0.5
35	Sierra Hwy.	Ave. P-8	E. Ave. Q	0.5
East San Gabriel Valley				
1	N. Sunset Ave.	Amar Rd.	Temple Ave.	0.4
6	Pathfinder Rd.	Paso Real Ave.	Alexdale Ln.	0.4
8	Amar Rd.	Vineland Ave.	N. Puente Ave.	0.4
12	Nogales St.	La Puente Rd.	Hollingsworth St.	0.4
13	Pathfinder Rd.	Fullerton Rd.	Paso Real Ave.	1.6
14	Fullerton Rd.	Colima Rd.	Pathfinder Rd.	1.6
16	Pathfinder Rd.	Alexdale Ln.	Canyon Ridge Rd.	1.9
~~8~~ 22	Glendora Ave.	Arrow Hwy.	Cienega Ave.	0.3
29	Gale Ave.	7th Ave.	Stimson Ave.	2.0
32	Amar Rd.	Willow Ave.	N. Unruh Ave.	1.5
~~41~~ 57	Valley Center Ave.	Arrow Hwy.	Badillo St.	0.6
Gateway				
~~1~~ 3	Mills Ave.	Telegraph Rd.	Lambert Rd.	1.4
~~3~~ 4	Colima Rd.	Poulter Dr.	~~Mulberry Ave.~~ Leffingwell Rd.	0.3
8	E. Victoria St.	S. Santa Fe Ave.	Susana Rd.	0.5
~~2~~ 9	Compton Blvd.	Harris Ave.	LA River Bike Path	0.8
12	1st Ave.	Lambert Ave.	Imperial Hwy.	0.8
~~12~~ 13	Rosecrans Ave.	Butler Ave.	Gibson Ave.	0.5
14	S. Susana Rd.	E. Artesia Blvd.	Del Amo Blvd.	2.0
~~16~~ 23	Lambert Rd.	Mills Ave.	Scott Ave.	1.3
24	Laurel Park Rd.	E. Victoria St.	S. Rancho Way	0.6

[1] Note: Projects within planning areas may be in a different order from those presented in the Draft PEIR due to renumbering of the projects.

ID	Planning Area – Street Location	From	To	Miles
28	S. Rancho Way	Laurel Park Rd.	Del Amo Blvd.	0.7
Metro				
~~1~~ 3	Cesar Chavez Ave.	Mednik Ave.	Vancouver Ave.	~~0.4~~ 0.3
~~3~~ 4	Normandie Ave.	98th St.	El Segundo Blvd.	2.1
7	E. Redondo Beach Blvd.	S. Figueroa St.	Avalon Blvd.	1.0
~~4~~ 8	Florence Ave.	Central Ave.	Mountain View Ave.	2.2
~~10~~ 11	El Segundo Blvd.	Figuroa St.	Central Ave.	1.6
~~16~~ 12	Compton Ave.	Slauson Ave.	92nd St.	2.5
13	Broadway	E. 121st St.	E. Alondra Blvd.	2.5
~~5~~ 14	Firestone Blvd.	Central Ave.	Alameda St.	1.4
~~15~~ 17	Holmes Ave.	Slauson Ave.	Gage Ave.	0.5
18	Rosecrans Ave.	Figueroa St.	Central Ave.	1.7
~~17~~ 23	Nadeau St./ Broadway	Central Ave.	State St.	2.6
25	Seville Ave.	E. Florence Ave.	Broadway	0.5
~~30~~ 32	Imperial Hwy.	Central Ave.	Wilmington Ave.	0.9
~~28~~ 38	120th St./119th St.	Central Ave.	Wilmington Ave.	0.8
~~29~~ 39	Eastern Ave.	0.1 mile ~~south~~ north of Whiteside St.	Olympic Blvd.	3.1
~~24~~ 40	Olympic Blvd.	Indiana St.	Concourse Ave.	3.3
~~35~~ 44	1st Ave.	Indiana St.	Eastern Ave.	1.8
~~42~~ 50	City Terrace Dr.	Hazard Ave.	Eastern Ave.	0.4
~~20~~ 52	Hooper Ave.	Slauson Ave.	~~95th St.~~ Florence Ave.	2.7
~~48~~ 59	120th St.	Western Ave.	Vermont Ave.	1.0
San Fernando Valley				
~~6~~ 11	Ocean View Blvd.	Foothill Blvd.	Honolulu Ave.	0.9
Santa Clarita Valley				
17	Lost Canyon Rd.	Via Princessa Rd.	Canyon Park Blvd.	0.5
22	Canyon Park Blvd.	Sierra Hwy.	Los Canyon Rd.	0.8

ID	Planning Area – Street Location	From	To	Miles
South Bay				
4	Manhattan Beach Blvd.	Prairie Ave.	Crenshaw Blvd.	1.0
7	Normandie Ave.	225th St.	Sepulveda Blvd.	0.6
~~6~~ 12	Aviation Blvd.	Imperial Hwy.	154th St.	~~0.6~~ 0.7
~~15~~ 16	223rd St.	Normandie Ave.	Vermont Ave.	0.5
21	Prairie Ave.	Redondo Beach Blvd.	St. Marine Ave.	1.2
~~18~~ 23	El Segundo Blvd.	Isis Ave.	Inglewood Ave.	0.8
~~22~~	~~Inglewood Ave.~~	~~El Segundo Blvd.~~	~~Rosecrans Ave.~~	~~1.0~~
West San Gabriel Valley				
25	Duarte Rd.	Sultana Ave.	Oak Ave.	0.4
33	Altadena Dr.	Canyon Close Rd.	Washington Blvd.	1.0
~~38~~ 45	Washington Blvd.	Bellford Dr.	Altadena Dr.	0.7
~~40~~ 47	California Blvd.	0.1 mile east of Brightside Ln.	Michillinda Ave.	1.0
~~39~~ 49	Temple City Blvd.	Duarte Rd.	Lemon Ave.	0.5
Westside				
8	Overhill Dr.	Stocker St.	Slauson Ave.	0.7
11	Angeles Vista Blvd.	Slauson Ave.	Vernon Ave.	~~1.7~~ 1.6
Source: Corbett pers. comm.; Garland pers. comm. (b)				

Section 3.6, Traffic and Transportation

Section 3.6.4.3, Impacts and Mitigation Measures

Impact 3.6-1: Cause an increase in traffic that is substantial in relation to the existing traffic volumes and capacity of the roadway system (e.g., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections) or exceed, either individually or cumulatively, a LOS standard established by the County Congestion Management Agency for designated roadways or highways, Mitigation Measures, MM 3.6-2:

The following change is made to the MM 3.6-2 because adopting a statement of overriding considerations is inconsistent with the finding of less than significant after mitigation, and the County does not propose to remove travel lane(s) if the result would be an unacceptable LOS.

MM 3.6-2: Implement site-specific traffic study recommendations.

For individual Bicycle Master Plan projects that would remove travel lane(s), if the site-specific traffic study concludes that the removal of lane(s) would cause a roadway section or intersection to operate at an unacceptable LOS, one of the following will occur:

- The project will be redesigned to maintain an acceptable LOS.
- Appropriate mitigation measures will be implemented to maintain an acceptable LOS.
- ~~A statement of overriding considerations will be adopted by the County.~~
- The project will be dropped.

Section 3.6, Traffic and Transportation

Section 3.6.4.3, Impacts and Mitigation Measures

Impact 3.6-3: Result in Parking Problems with a Subsequent Impact on Traffic Conditions, Operation, Table 3.6-6:

3.6-6. Potential Locations of On-street Parking Removal[2]

ID	Street	From	To	Length (miles)
East San Gabriel Valley				
1	N. Sunset Ave.	Amar Rd.	Temple Ave.	1.5
8	Amar Rd.	Vineland Ave.	N. Puente Ave.	0.4
12	Nogales St.	La Puente Rd.	Hollingworth St.	0.4
~~12~~ 21	Fairway Dr./Brea Canyon Cut Off Rd.	Walnut Rd.	Bickford Dr.	1.0
32	Amar Rd.	Willow Ave.	N. Unruh Ave.	1.5
~~27~~ 34	Camino Del Sur	Vallecito Dr.	Colima Rd.	0.9
~~22~~ 36	Halliburton Rd.	Hacienda Blvd.	Stimson Ave.	0.2
~~42~~ 53	7th Ave.	Clark Ave.	Beech Hill Dr.	1.3
Gateway				
~~1~~ 3	Mills Ave.	Telegraph Rd.	Lambert Rd.	1.4
~~3~~	~~Colima Rd.~~	~~Poulter Dr.~~	~~Leffingwell Rd.~~	~~0.3~~
8	E. Victoria St.	S. Santa Fe Ave.	Susana Rd.	0.5
~~13~~ 12	1st Ave.	Lambert Rd.	Imperial Hwy.	0.8
14	S. Susana Rd.	E. Artesia Blvd.	Del Amo Blvd.	2.0

[2] Note: Projects within planning areas may be in a different order from those presented in the Draft PEIR due to renumbering of the projects.

ID	Street	From	To	Length (miles)
~~20~~	~~Leffingwell Rd.~~	~~Imperial Hwy.~~	~~Scott Ave.~~	~~3~~
Metro				
25	Seville Ave.	E. Florence Ave.	Broadway	0.5
~~23~~ 29	Avalon Blvd.	121st St.	E. Alondra Blvd.	2.5
~~43~~ 54	Central Ave.	121st St.	127th St.	1.0
~~33~~ 60	El Segundo Blvd.	Wilmington Ave.	Alameda St.	0.9
South Bay				
2	Redondo Beach Blvd.	Prairie Ave.	Crenshaw Blvd.	1.2
~~10~~ 6	Marine Ave.	Prairie Ave.	Crenshaw Blvd.	0.9
~~17~~ 25	Vermont Ave.	190th St.	Lomita Blvd.	3.7
West San Gabriel Valley				
10	Huntington Dr.	San Gabriel Blvd.	Michillinda Ave.	1.4
~~9~~ 12	Colorado Blvd.	Kinneola Ave.	Michillinda Ave.	1.1
~~31~~ 25	Duarte Rd.	San Gabriel Blvd.	Sultana Ave.	1.0
28	Glenview Terrace/ Glen Canyon Rd./ Roosevelt Ave.	Allen Ave	Washington Blvd.	1.6
33	Altadena Dr.	Canyon Close Rd.	Washington Blvd.	1.0
39	Casitas Ave.	Ventura St.	W. Altadena Dr.	0.5
~~36~~ 48	Longden Ave.	San Gabriel Blvd.	Rosemead Blvd.	1.0
Westside				
~~12~~ 13	Fairfax Ave.	Stocker St.	W 57th St.	0.6
~~10~~ 14	Centinela Ave.	Green Valley Cir.	La Tijera Blvd.	0.9
Source: Corbett pers. comm.; Garland pers. comm. (a), (b).				

Section 3.7, Air Quality/Greenhouse Gas Emissions

Section 3.7.4.3, Impacts and Mitigation Measures

Impact 3.7-4: Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, paragraphs 1 and 2, and Table 3.7-9:

Construction of the proposed project would generate GHG emissions through the use of onsite construction equipment and offsite vehicle trips generated from construction workers, as well as haul/delivery trucks that travel to and from the project site. Table 3.7-9 presents an estimate of project-related GHG emissions of CO_2, CH_4, and N_2O, expressed in terms of CO_2e.

The proposed project's annual GHG emissions are estimated to be ~~1,223~~ 1,468 metric tons CO_2e. This estimate reflects emissions from all construction activity amortized over 30 years. To put this number into perspective, statewide CO_2e emissions for year 2006 were estimated to be 479.8 million metric tons.

Table 3.7-9. Estimate of Project-Related Greenhouse Gas Emissions

Project Emissions	Annual CO_2e (metric tons)
Class I Bike Path Construction	~~121.6~~ 126.4
Class II Bike Lane Construction	~~395.8~~ 482.5
Class III Bike Route Construction	~~705.2~~ 858.8
Total Project GHG Emissions	~~1,223~~ 1,468
Note: Includes total construction period emissions amortized over 30 years.	

Section 3.8, Mineral Resources, Figures 3.8-1 and 3.8-2

Figures 3.8-1 and 3.8-2, showing the Bicycle Master Plan's relationship to mineral resources and oil fields, are revised to include the revised Bicycle Master Plan. The new figures are at the end this chapter.

Chapter 5, Alternatives

The following text is added to this chapter.

5.5 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires that an environmentally superior alternative be identified among the alternatives considered. The environmentally superior alternative is generally defined as the alternative that would result in the least adverse environmental impacts. If the No Project Alternative is found to be the environmentally superior alternative, the document must identify an environmentally superior alternative among the other alternatives.

For the Bicycle Master Plan project, the environmentally superior alternative is the proposed project, as defined in Chapter 2 of the Draft PEIR. Although impacts would result from this the proposed project, all impacts would be reduced to less-than-significant levels through mitigation that would be incorporated into the project. In addition, the Bicycle Master Plan would result in beneficial impacts to the environment that would not occur with the No Project Alternative or would be less with Alternative 1, No Class I Bike

Paths Plan, or Alternative 2, Reduced Class II Bike Lanes Plan. The beneficial impacts that would result from the Bicycle Master Plan would be primarily improvements to traffic, air quality, and greenhouse gas emissions to the extent that people would use bicycles rather than motor vehicles as transportation. These environmental benefits, combined with the less-than-significant environmental impacts of the Bicycle Master Plan with incorporation of mitigation, result in the determination that the proposed project is the environmentally superior alternative.

Chapter 9, References

The following section is added to this chapter.

9.6 Final PEIR References

9.6.1 Printed References

Alta Planning + Design. 2011b. *County of Los Angeles Bicycle Master Plan.* Final. December 2011. Los Angeles, CA. Prepared for County of Los Angeles Department of Public Works, Alhambra, CA.

9.6.2 Personal Communications

Garland, Andrea (a). Planner. Alta Planning + Design. October 7, 2011—email to Abu Yusuf et al., County of Los Angeles Department of Public Works.

Garland, Andrea (b). Planner. Alta Planning + Design. December 5, 2011—email to Donna McCormick, ICF International.

Chapter 2 | Comments Received and Responses

2.1 Introduction

In accordance with Section 15088 of Title 14 of the California Code of Regulation (the "State CEQA Guidelines"), the County has reviewed and evaluated the comments received on the Draft PEIR for the Bicycle Master Plan and has prepared written responses to comments. This chapter contains copies of the comments received during the public review process and provides an evaluation and written response for each of these comments.

2.2 Comments Received

During the public review period for the Draft PEIR, which occurred between August 9, 2011 and November 10, 2011[1], the County received 10 comments letters and comments from agencies, organizations, and individuals. One verbal comment was received during a public hearing held on September 15, 2011. The verbal comment was the same as a comment card submitted at that hearing, so it is grouped with that comment to avoid redundancy (Commenter J).

The commenting parties are listed below, along with a corresponding letter for organizational purposes of identifying comments and responses, which are provided in this chapter.

Table 2-1. Comments Received

Commenter ID Code	Name/Agency	Correspondence Date
A	City of Pico Rivera, Community and Economic Development Department (Julia Gonzalez, Interim Director)	September 12, 2011
B	City of Glendora (Dianne Walter, Planning Manager)	September 19, 2011
C	City of San Marino, Planning and Building Department (Amanda Merlo, Planning and Building Assistant)	September 6, 2011
D	County of Los Angeles, Department of Parks and Recreation (Joan Rupert, Section Head, Environmental and Regulatory Permitting Section)	September 21, 2011
E	Native American Heritage Commission (Dave Singleton, Program Analyst)	August 30, 2011
F	City of Industry (John Ballas, City Engineer)	August 25, 2011
G	Los Angeles County Bicycle Coalition (Alexis Lantz, Planning and Policy Director)	September 23, 2011
H	Southern California Association of Governments (Jacob Lieb, Manager, Environmental and Assessment Services)	September 21, 2011

[1] The comment period was originally scheduled to end on September 23, 2011. However, due to a procedural error, the Notice of Availability was not correctly posted at the County Clerk's office, so the comment period was extended to November 10, 2011.

Commenter ID Code	Name/Agency	Correspondence Date
I	Jon Nahhas	September 12, 2011
J	City of Pico Rivera (Guille Aguilar) (comment card at public hearing)[1]	September 15, 2011
K	Antelope Valley Air Quality Management District (Bret Banks)	October 17, 2011
L	Latham & Watkins LLP, representing NBCUniversal (Maria Howe)	November 10, 2011
M	County of Los Angeles Sheriff's Department Headquarters (Leroy D. Baca, Sheriff/Gary T. K. Tse, Director, Facilities Planning Bureau)	November 1, 2011
N	Multiple Commenters (see letter)	November 5, 2011

[1] Note: Guille Aguilar also provided the same comment orally at the public hearing. See Appendix A.

2.3 Comments and Responses to Comments

This section presents all written and oral comments (as documented in the public hearing transcript) on the Draft PEIR received by the County and the responses to these comments, in accordance with Section 15088 of the State CEQA Guidelines. In accordance with the CEQA Guidelines, responses are prepared for those comments that address the sufficiency of the environmental document regarding the adequate disclosure of environmental impacts and the methods to avoid or mitigate those impacts. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by the reviewers, as long as a good faith effort at full disclosure was made in the Draft PEIR. The responses contained herein provide the required responses under CEQA and provide explanations if comments are not applicable under CEQA. This allows the decision makers to understand the full context of the comments and consider them in their decision making, even if they are outside the scope of the PEIR.

2.3.1 Commenter A: City of Pico Rivera, Community and Economic Development Department (Gonzales)

Commenter A

City of Pico Rivera
COMMUNITY AND ECONOMIC DEVELOPMENT DEPARTMENT
6615 Passons Boulevard · Pico Rivera, California 90660
(562) 801-4332 Fax (562) 949-0280
Web: www.pico-rivera.org · e-mail: avillanueva@pico-rivera.org

Julia Gonzalez
Interim Director

September 12, 2011

County of Los Angeles Department of Public Works
Programs Development Division, 11th Floor
Attention: Ms. Reyna Soriano
P.O. Box 1460
Alhambra, CA 91802-1460

SUBJECT: PUBLIC COMMENT SUBMITTAL - DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR) FOR THE COUNTY OF LOS ANGELES BICYCLE MASTER PLAN

Dear Ms. Soriano:

On behalf of the City Council and City Manager of the City of Pico Rivera, we would like to submit a formal comment for the County of Los Angeles Bicycle Master Plan – Draft Program Environmental Impact Report. Our formal comment is as follows:

Section 2.6.2 of the PEIR states, "[t]he Plan proposes an expanded bikeway network in unincorporated communities and along rivers, creeks, and flood control facilities within County jurisdiction". Section 2.3 of the PEIR states that the purpose of the Plan is to provide, "direction for expanding the existing bikeway network, connecting gaps, addressing constrained areas, providing for greater local and regional connectivity, and encouraging more residents to bicycle more often". A-1

After reviewing the draft Plan and PEIR, the City believes that an optimal connectivity opportunity was not included or analyzed. This opportunity is the construction of a bicycle path (bridge) over the San Gabriel River connecting the Mines Avenue bicycle route in Pico Rivera to the Dunlap Crossing bicycle route in an unincorporated community near the City of Whittier (see attached map and aerial photograph). The land involved in this proposed bicycle path is within the boundaries of the City of Pico Rivera but, because it is a river and flood control facility, it is under the jurisdiction of the County.

Bridging this gap will provide a more urban connection between the Rio Hondo Bike Path and the San Gabriel River Bikeway; the nearest bikeway connection between these two rivers is several miles north along the Whittier Narrows Recreation Area. The suggested bridge will also result in the connection of the County's major bike systems by linking the Los Angeles River Park Bike Path to the Rio Hondo River Bicycle Path and then to the San Gabriel River Bikeway. This will result in easier access for bicyclists, greater regional connectivity within the bike system and encourage the use of these facilities. A-1

Note that we had previously submitted this comment orally at the public workshop held in the Baldwin Park Library on March 29, 2011. At that time, several members of the audience agreed with and supported the City's comment.

Please keep us apprised of the status of this comment. Any questions or concerns regarding this comment should be directed to Ms. Guille Aguilar, Senior Planner. She can be reached via email at gaguilar@pico-rivera.org or at (562) 801-4332.

We look forward to working with the County on the update of the Bicycle Master Plan.

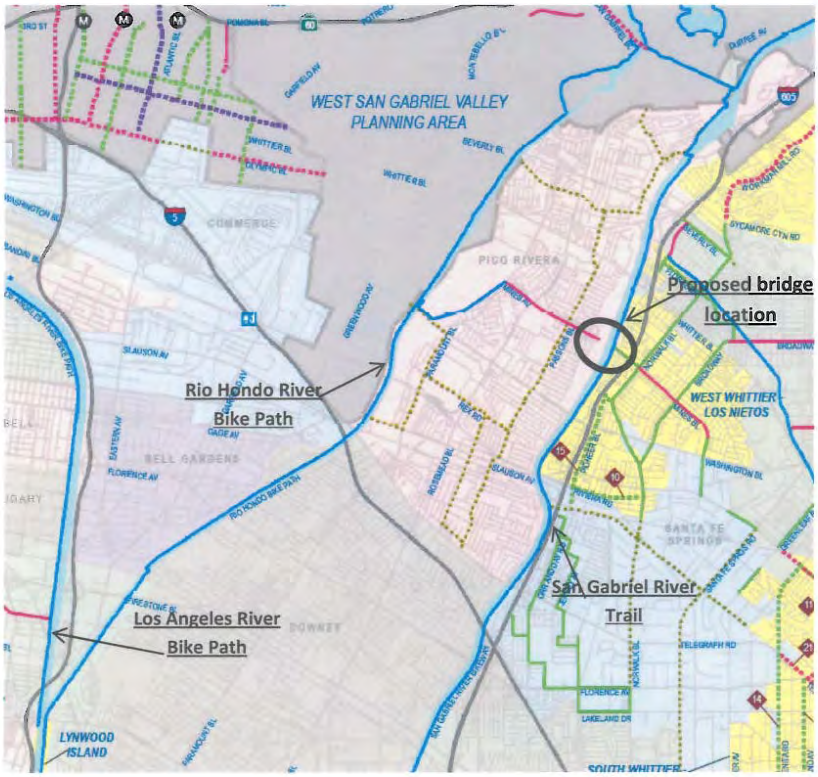
Respectfully,

Julia Gonzalez
Interim Director of Community and Economic Development

CC: Ronald Bates, City Manager
Attachment: Map and aerial photograph

JG: GA

Map:


WEST SAN GABRIEL VALLEY
PLANNING AREA
Proposed bridge
location
Rio Hondo River
Bike Path
WEST WHITTIER-
LOS NIETOS
San Gabriel River
Trail
Los Angeles River
Bike Path
LYNWOOD
ISLAND

Aerial Photograph:

Response to Comment A-1
Requesting additional bikeway be added to the Bicycle Master Plan

This comment requests a change in the project description (the Bicycle Master Plan), but it does not identify any environment impacts that would be avoided by inclusion of this bikeway. In accordance with Section 15132 of the CEQA Guidelines, the Final PEIR need only respond to relevant environmental issues. This comment is outside the scope of the CEQA analysis. However, this comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

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2.3.2 Commenter B: City of Glendora (Walter)

Commenter B

CITY OF GLENDORA CITY HALL (626) 914-8200
116 East Foothill Blvd., Glendora, California 91741
www.ci.glendora.ca.us

September 19, 2011

County of Los Angeles Department of Public Works
Programs Development Division, 11th Floor
Attention Ms. Reyna Soriano
P.O. Box 1460
Alhambra, CA 91802-1460

RE: Notice of Availability - LA County Bicycle Master Plan

Dear Ms Soriano,

Thank you for providing the City of Glendora an opportunity to comment on the Los Angeles County Bicycle Master Plan Draft Environmental Impact Report. The City of Glendora is in strong support of upgrading and expanding the bicycle network throughout the San Gabriel Valley and the County as a whole. B-1

On April 28, 2011, we provided comments as part of the CEQA NOP process. The proposed draft master plan failed to address our comments with the exception of listing the recommended Bike Way along the Dalton Wash which is described as a bikeway "proposed by other jurisdictions". There is no clear explanation of what "proposed by other jurisdictions" means. We would like a clear explanation of the beige colored doted bikeway along Dalton Wash and what that implies for Glendora. B-2

In addition, please address our previous comments as shown below.

1. Provide a connection from the existing Class III Bike Route on Gladstone Street westward to the proposed bike route in Covina.
2. Regarding the proposed route in Covina, it appears to be located along the Dalton Wash which extends through the City of Glendora up into Dalton Canyon. We would like to see the plan provide for the extension of the trail along the Dalton Wash all the way to Dalton Canyon. Also see comment No. 6. B-3
3. Extend the proposed westbound route on Mauna Loa Avenue to connect with the proposed north-south street route in Azusa.
4. Connect the existing bike route on South Glendora Avenue to the proposed Class II bike lane along Arrow Highway.

PRIDE OF THE FOOTHILLS

5. Extend the Class III Bike Route eastward on Foothill Boulevard to connect with the existing bike lane on Foothill Boulevard in San Dimas.
6. One of the Master Plan proposals is to extend the Class III Bike Route on Glendora Mountain Road (GMR) up through the mountains into the National Forest area. You may be aware that Glendora Mountain Road is a very steep, winding road which is popular with advanced cyclists. Indeed, the Tour of California will be including GMR on one of their stages. Unfortunately, the road is also popular with auto traffic and we have had a number of tragic accidents on GMR in the past few months; one occurred last night. We would like to ask the County to explore the feasibility of creating either a Class I bike path or Class II bike lane on GMR to reduce the danger riders are experiencing. The proposed Class III bike route will not provide enough protection for cyclists.

B-3

Please call me at 626-914-8218 or email dwalter@ci.glendora.ca.us if you have any questions.

Sincerely,

Dianne Walter,
Planning Manager

Attachment: NOP Comment letter stated April 28, 2011 from Glendora

Cc: Jerry Burke, City Engineer
Jeff Kugel, Director, Planning and Redevelopment

CITY OF GLENDORA CITY HALL (626) 914-8200
116 East Foothill Blvd., Glendora, California 91741
www.ci.glendora.ca.us

April 28, 2011

County of Los Angeles Department of Public Works
Programs Development Division, 11th Floor
Attention Ms. Reyna Soriano
P.O. Box 1460
Alhambra, CA 91802-1460

RE: Notice of Preparation - LA County Bicycle Master Plan

Dear Ms Soriano,

Thank you for providing the City of Glendora an opportunity to comment on the Los Angeles County Bicycle Master Plan. The City of Glendora is in strong support of upgrading and expanding the bicycle network throughout the San Gabriel Valley and the County as a whole.

We would like to offer the following suggestions for improving the proposed Bicycle Master Plan in the vicinity of Glendora:

1. Provide a connection from the existing Class III Bike Route on Gladstone Street westward to the proposed bike route in Covina.
2. Regarding the proposed route in Covina, it appears to be located along the Dalton Wash which extends through the City of Glendora up into Dalton Canyon. We would like to see the plan provide for the extension of the trail along the Dalton Wash all the way to Dalton Canyon.
3. Extend the proposed westbound route on Mauna Loa Avenue to connect with the proposed north-south street route in Azusa.
4. Connect the existing bike route on South Glendora Avenue to the proposed Class II bike lane along Arrow Highway.
5. Extend the Class III Bike Route eastward on Foothill Boulevard to connect with the existing bike lane on Foothill Boulevard in San Dimas.

B-3 cont.

One of the Master Plan proposals is to extend the Class III Bike Route on Glendora Mountain Road (GMR) up through the mountains into the National Forest area. You may be aware that Glendora Mountain Road is a very steep, winding road which is popular with advanced cyclists. Indeed, the Tour of California will be including GMR on one of their stages. Unfortunately, the

B-4

PRIDE OF THE FOOTHILLS

road is also popular with auto traffic and we have had a number of tragic accidents on GMR in the past few months; one occurred last night. We would like to ask the County to explore the feasibility of creating either a Class I bike path or Class II bike lane on GMR to reduce the danger riders are experiencing. The proposed Class III bike route will not provide enough protection for cyclists.

B-4 cont.

Please call me at 626-914-8218 or email dwalter@ci.glendora.ca.us if you have any questions.

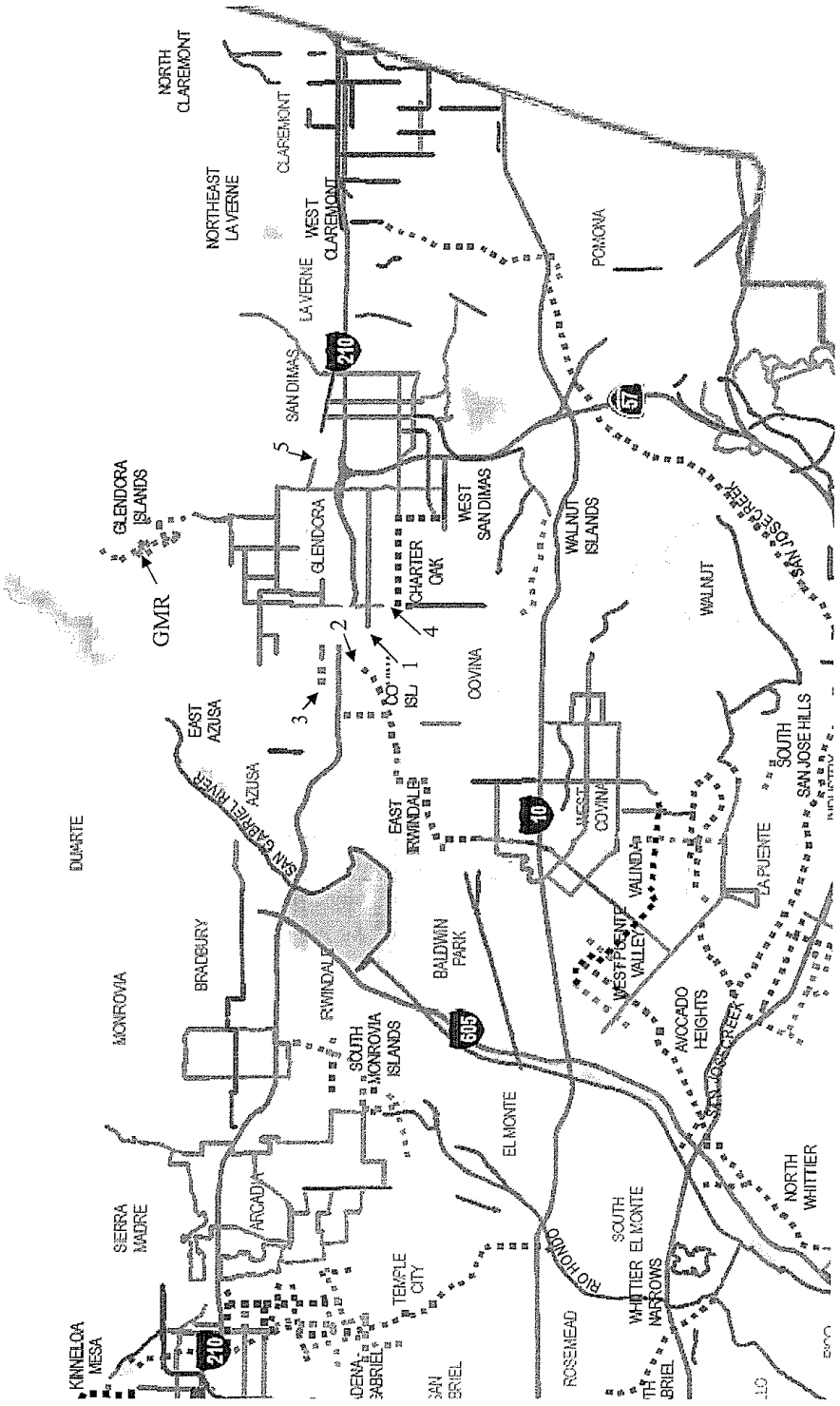
Sincerely,

Dianne Walter

Dianne Walter,
Planning Manager

Attachment: Enlarged Master Plan of Glendora vicinity annotated to correspond to numbered suggestions

Cc: Jerry Burke, City Engineer
Jeff Kugel, Director, Planning and Redevelopment


NORTH CLAREMONT
CLAREMONT
NORTHEAST LA VERNE
WEST CLAREMONT
LA VERNE
SAN DIMAS
POMONA
GLENDORA ISLANDS
GLENDORA
CHARTER OAK
WEST SAN DIMAS
WALNUT ISLANDS
WALNUT
SAN JOSE CREEK
GMR
EAST AZUSA
AZUSA
COVINA
EAST IRWINDALE
WEST COVINA
SOUTH SAN JOSE HILLS
DUARTE
BRADBURY
MONROVIA
IRWINDALE
BALDWIN PARK
VALINDA
LA PUENTE
SOUTH MONROVIA ISLANDS
WEST PUENTE VALLEY
AVOCADO HEIGHTS
SIERRA MADRE
ARCADIA
EL MONTE
TEMPLE CITY
ROSEMEAD
SOUTH EL MONTE
NORTH WHITTIER
WHITTIER NARROWS
KINNELOA MESA
SAN GABRIEL RIVER
210
605
10
57
1
2
3
4
5

Response to Comment B-1
Expressing support for upgrading and expanding the bicycle network

This comment expresses strong support for upgrading and expanding the bicycle network throughout the San Gabriel Valley and the County as a whole, but it does not address environmental issues. In accordance with Section 15132 of the CEQA Guidelines, the Final PEIR need only respond to relevant environmental issues. This comment is outside the scope of the CEQA analysis. However, this comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

Response to Comment B-2
Requesting explanation of symbols and text in the Draft Bicycle Master Plan

The comment provided addresses the Bicycle Master Plan, not the Draft PEIR. This comment is outside the scope of the CEQA analysis. Therefore, no response in the Final PEIR is necessary. However this comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

Response to Comment B-3
Requesting additional bikeways or changes to bikeways in the Bicycle Master Plan

This comment requests a change in the project description (the Bicycle Master Plan), but it does not identify any environment impacts that would be avoided by changes to the Plan. In accordance with Section 15132 of the CEQA Guidelines, the Final PEIR need only respond to relevant environmental issues. This comment is outside the scope of the CEQA analysis. However, this comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

Response to Comment B-4
Requesting change in the Bicycle Master Plan

This comment requests a change in the project description (the Bicycle Master Plan) due to safety concerns, but it does not identify any environment impacts that would be avoided by changes to the Plan. In accordance with Section 15132 of the CEQA Guidelines, the Final PEIR need only respond to relevant environmental issues. This comment is outside the scope of the CEQA analysis. However, this comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

2.3.3 Commenter C: City of San Marino, Planning and Building Department (Merlo)

PDD 605

City of San Marino
Planning & Building Department

Commenter C

September 6, 2011

County of Los Angeles Department of Public Works
Programs Development Division, 11th Floor
Attn: Ms. Reyna Soriano
P.O. Box 1460
Alhambra, CA 91802-1460

SUBJECT: RESPONSE TO THE COUNTY OF LOS ANGELES BICYCLE MASTER PLAN DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

Dear Ms. Soriano:

Thank you for the opportunity to review and comment on the County of Los Angeles Bicycle Master Plan Draft Program Environmental Impact Report. The City of San Marino has no comments regarding the project at this time. However, the City would be interested in receiving further information about the potential traffic impacts to the West San Gabriel Valley area of the project when such information becomes available. C-1

Please update my contact information as follows:

Amanda Merlo, Planning and Building Assistant
City of San Marino
2200 Huntington Drive
San Marino, CA 91108
626-300-0784
amerlo@cityofsanmarino.org

Please feel free to contact me should you have any questions or need additional information.

Sincerely,

Amanda Merlo

AMANDA MERLO
Planning and Building Assistant

2200 Huntington Drive, San Marino, CA 91108-2639 • Phone: (626)300-0711 Fax: (626)300-0716

Response to Comment C-1

Requesting further information about traffic impacts in the West San Gabriel Valley area

The comment states that the City of San Marino has no comments regarding the project at this time but requests additional information about potential traffic impacts when such information is available. As stated in Section 3.6 of the Draft PEIR, "Traffic and Transportation," detailed analysis of traffic impacts will be required prior to implementation of individual Bicycle Master Plan projects as part of the project-level CEQA analysis. For any projects affecting traffic in the San Marino area, the City will be notified during the project-level analysis.

2.3.4 Commenter D: County of Los Angeles, Department of Parks and Recreation (Rupert)

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Creating Community Through People, Parks and Programs"
Russ Guiney, Director

Commenter D

September 21, 2011 sent via email:rsoriano@dpw.lacounty.gov

TO: Reyna Soriano
Department of Public Works

FROM: Jean Rupert, Section Head
Environmental and Regulatory Permitting Section

SUBJECT: **DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR) FOR THE COUNTY OF LOS ANGELES BICYCLE MASTER PLAN**

The Draft PEIR for the above project has been reviewed for potential impacts on the facilities of the Department of Parks and Recreation (DPR). We have determined that the previously submitted comments pertaining to DPR trails were adequately addressed. D-1

Thank you for including this Department in the review of this notice. If you have any trail related questions, please contact Mr. Francis Yee at (213) 639-6058 or email fyee@parks.lacounty.gov. For any other inquires, please contact Ms. Julie Yom at (213) 351-5127 or jyom@parks.lacounty.gov.

JR: JY/ Response to DPW_PEIR for Bicycle Master Plan

c: Parks and Recreation (N. E. Garcia, L. Hensley, F. Moreno, F. Yee, J. Yom)

Planning and Development Agency • 510 South Vermont Ave • Los Angeles, CA 90020-1975 • (213) 351-5099

Response to Comment D-1
Stating previous comments were adequately addressed

The comment states that the County of Los Angeles, Department of Parks and Recreation's previous comments have been adequately addressed. No response is necessary.

2.3.5 Commenter E: Native American Heritage Commission (Singleton)

Commenter E

STATE OF CALIFORNIA Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
ds_nahc@pacbell.net

August 30, 2011

Ms. Reyna Soriano, Environmental Planner
County of Los Angeles Department of Public Works
Programs Development Division, 11th Floor
P.O. Box 1460
Alhambra, CA 91802-1460

Re: SCH#2011041004; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the **"County of Los Angeles Bicycle Master Plan"** located throughout the County of Los Angeles, California.

Dear Ms. Soriano:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604). The NAHC wishes to comment on the proposed project.

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ...objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC Sacred Lands File (SLF) Inventory contains numerous **Native American cultural resources and Burial Grounds.** Contact Native Americans on the attached list for more detailed information and the possible impact of the proposed Bicycle corridors on these resources and burial sites. E-1

The NAHC "Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway.

Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list. to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources. E-1

Furthermore, the NAHC is of the opinion that the current project remains under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq*. and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.' E-2

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity. E-3

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery'. E-4

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects. E-5

2

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,

Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

3

California Native American Contact List
Los Angeles County
August 30, 2011

Charles Cooke
32835 Santiago Road
Acton , CA 93510
suscol@intox.net

(661) 733-1812 - cell
suscol@intox.net

Chumash
Fernandeno
Tataviam
Kitanemuk

Patrick Tumamait
992 El Camino Corto
Ojai , CA 93023
(805) 640-0481
(805) 216-1253 Cell

Chumash

Beverly Salazar Folkes
1931 Shadybrook Drive
Thousand Oaks, CA 91362
folkes@msn.com
805 492-7255
(805) 558-1154 - cell
folkes9@msn.com

Chumash
Tataviam
Ferrnandeño

LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 6th St, Rm. 403
Los Angeles , CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

Fernandeno Tataviam Band of Mission Indians
Ronnie Salas, Cultural Preservation Department
601 South Brand Boulevard, Suite 102
San Fernando CA 91340
rsalas@tataviam-nsn.gov
(818) 837-0794 Office

(818) 837-0796 Fax

Fernandeno
Tataviam

Owl Clan
Qun-tan Shup
48825 Sapaque Road
Bradley , CA 93426
mupaka@gmail.com
(805) 472-9536 phone/fax
(805) 835-2382 - CELL

Chumash

Barbareno/Ventureno Band of Mission Indians
Julie Lynn Tumamait, Chairwoman
365 North Poli Ave
Ojai , CA 93023
jtumamait@sbcglobal.net
(805) 646-6214

Chumash

Ti'At Society/Inter-Tribal Council of Pimu
Cindi M. Alvitre, Chairwoman-Manisar
3098 Mace Avenue, Aapt. D
Costa Mesa, , CA 92626
calvitre@yahoo.com
(714) 504-2468 Cell

Gabrielino

This list is current only as of the date of this document.
Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed sCH#2011041004; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the County of Los Angeles Bicycle Master Plan; also requires a General Plan Amendment; location is throughout the County of Los Angeles, California.

California Native American Contact List
Los Angeles County
August 30, 2011

Tehachapi Indian Tribe
Attn: Charlie Cooke
32835 Santiago Road
Acton , CA 93510
suscol@intox.net
(661) 733-1812
Kawaiisu

Gabrieleno/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693
San Gabriel , CA 91778
GTTribalcouncil@aol.com
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 -FAX
Gabrielino Tongva

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Private Address
,
tattnlaw@gmail.com
310-570-6567
Gabrielino Tongva

Randy Guzman - Folkes
655 Los Angeles Avenue, Unit E
Moorpark , CA 93021
ndnRandy@yahoo.com
(805) 905-1675 - cell
Chumash
Fernandeño
Tataviam
Shoshone Paiute
Yaqui

Kitanemuk & Yowlumne Tejon Indians
Delia Dominguez, Chairperson
981 N. Virginia
Covina , CA 91722
deedominguez@juno.com
(626) 339-6785
Yowlumne
Kitanemuk

Gabrielino Tongva Nation
Sam Dunlap, Chairperson
P.O. Box 86908
Los Angeles , CA 90086
samdunlap@earthlink.net

(909) 262-9351 - cell
Gabrielino Tongva

San Fernando Band of Mission Indians
John Valenzuela, Chairperson
P.O. Box 221838
Newhall , CA 91322
tsen2u@hotmail.com
(661) 753-9833 Office
(760) 885-0955 Cell
(760) 949-1604 Fax
Fernandeño
Tataviam
Serrano
Vanyume
Kitanemuk

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
P.O. Box 490
Bellflower , CA 90707
gtongva@verizon.net
562-761-6417 - voice
562-761-6417- fax
Gabrielino Tongva

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This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed sCH#2011041004; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the County of Los Angeles Bicycle Master Plan; also requires a General Plan Amendment; location is throughout the County of Los Angeles, California.

California Native American Contact List
Los Angeles County
August 30, 2011

Carol A. Pulido
165 Mountainview Street Chumash
Oak View , CA 93022
805-649-2743 (Home)

Gabrielino-Tongva Tribe
Linda Candelaria, Chairwoman
1875 Century Park East, Suite 1500
Los Angeles , CA 90067 Gabrielino
lcandelaria1@gabrielinoTribe.org
626-676-1184- cell
(310) 587-0170 - FAX
760-904-6533-home

Melissa M. Parra-Hernandez
119 North Balsam Street Chumash
Oxnard , CA 93030
envyy36@yahoo.com
805-983-7964

Santa Ynez Tribal Elders Council
Freddie Romero, Cultural Preservation Conslnt
P.O. Box 365 Chumash
Santa Ynez , CA 93460
805-688-7997, Ext 37
freddyromero1959@yahoo.com

Frank Arredondo
PO Box 161 Chumash
Santa Barbara Ca 93102
ksen_sku_mu@yahoo.com
805-617-6884
ksen_sku_mu@yahoo.com

Aylisha Diane Marie Garcia Napoleone
33054 Decker School Road Chumash
Malibu , CA 90265
702-741-6935

Gabrielino-Tongva Tribe
Bernie Acuna
1875 Century Pk East #1500 Gabrielino
Los Angeles , CA 90067
(619) 294-6660-work
(310) 428-5690 - cell
(310) 587-0170 - FAX
bacuna1@gabrieinotribe.org

Gabrieleno Band of Mission Indians
Andrew Salas, Chairperson
P.O. Box 393 Gabirelino Tongva
Covina , CA 91723
(626) 926-4131
gabrielenoindians@yahoo.com

This list is current only as of the date of this document.
Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed sCH#2011041004; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the County of Los Angeles Bicycle Master Plan; also requires a General Plan Amendment; location is throughout the County of Los Angeles, California.

Response to Comment E-1

Requesting analysis of impacts to historical resources, including consultation with Native American tribes, and encouraging avoidance as the primary method for mitigation

The Draft PEIR provided a program-level analysis of the potential for impacts to cultural resources in Section 3.4, "Cultural Resources." The type of analysis requested in this comment is more appropriate at the project level, when further information about actual project footprints will be available.

Section 3.4, "Cultural Resources," states that site-specific analysis of impacts to archaeological resources and historical resources will be required prior to implementation of any Bicycle Master Plan project. These project-level analyses will include literature and record searches and field surveys, and will be carried out by qualified archaeologists, historians, and architectural historians, as appropriate. It is standard procedure to review the Native American Heritage Commissions Sacred Lands Files during these analyses, as well as to consult with Native American tribes.

Mitigation Measures MM 3.4-1 and MM 3.4-2 specifically list avoidance first as the preferred method of mitigating impacts.

Response to Comment E-2

Stating an opinion that the project requires compliance with the National Environmental Policy Act (NEPA)

The comment does not state a reason why NEPA would be triggered by the project. This comment is outside the scope of the CEQA analysis. However, this comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

Response to Comment E-3

Requesting confidentiality of "historic properties of religious and cultural significance"

The comment does not address the Draft PEIR. The confidentiality requirements for historic properties of religious and cultural significance are a standard practice of professional archaeologists and historians and will be observed during project-level CEQA analyses.

Response to Comment E-4

***Requesting compliance with Public Resources Code Section 5097.98, California Government code Section 27491, and Health and Safety Code Section 7050.5 related to accidental discoveries during construction*)**

The comment does not address the Draft PEIR. Compliance with the cited codes is a standard practice for professional archaeologists and historians and will be included in the treatment plans at the project level.

Response to Comment E-5
Requesting consultation with Native American tribes

See response to Comment E-1, above. At the project level, the CEQA process will include appropriate consultation with the affected Native American tribes.

2.3.6 Commenter F: City of Industry (Ballas)

Commenter F

CITY OF INDUSTRY
Incorporated June 18, 1957

August 25, 2011

Ms. Reyna Soriano
County of Los Angeles Department of Public Works
Programs Development Division, 11th Floor
P.O. Box 1460
Alhambra, CA 91802-1460

Mr. Sam Corbett, Project Lead
Alta Planning & Design
453 S. Spring St., Ste 804
Los Angeles, CA 90013

Subject: County of Los Angeles Bicycle Master Plan Draft Program Environmental Impact Report

F-1

Dear Ms. Soriano:

Thank you for the opportunity to review the County of Los Angeles Bicycle Master Plan Draft Program Environmental Impact Report (PEIR). The City of Industry supports bicycle travel within the region, however, it is concerned about the safety of bicyclists along our streets and the preservation of the present level of service "LOS" within its system of roadways. The streets in the City of Industry are unique in that there is no curbside parking. Each street, regardless of classification, is either painted as "red curb" or signed for "no street parking". There are no truck restrictions by size or weight on any streets in the City

In order to support high traffic levels (especially regional traffic on north-south streets) it is common practice in Industry to fully utilize the existing curb to curb width for traffic lanes. As a recent example, a third lane was added along Valley Boulevard in the east-west direction from Azusa Avenue to Grand Avenue which effectively utilized the entire right of way for vehicular travel. Given the 2 foot gutter next to the curb, there is not adequate width remaining to accommodate on-street bicycle travel without forcing cyclists into the vehicular lanes.

The Draft County of Los Angeles Bicycle Master Plan and the PEIR should:

- Remove the designation of Class II bike lanes from the following streets in the City;
  1) Puente Avenue (northerly of Valley Blvd.)
  2) Nogales Street (Valley Blvd. to Gale Ave.)
  3) Gale Avenue (7th Ave. to Stimson Ave.)
  4) Vineland Avenue (Valley Blvd. to Nelson Ave.)
  5) Echelon Avenue

F-2

- Address the feasibility of constructing bicycle paths along the San Jose Creek "SJC" without the use of mid-block crossings, which have been demonstrated to be dangerous by giving the pedestrian or cyclist a "false" sense of security while crossing. In most instances, the San Jose Creek crosses under streets where there is no nearby signalized intersection to protect bicyclists using the SJC bike bath. Alternatively, the use of under crossings (commonly seen along the San Gabriel River and Santa Ana River trails) may be difficult to construct given the close proximity of existing bridge abutments to the vertical concrete wall of the SJC at each street crossing.

P.O. Box 3366, City of Industry, California 91744-0366 • Administrative Offices: 15625 E. Stafford St. • (626) 333-2211 • Fax (626) 961-6795

F-3

- The PEIR should address the potential impacts to adjacent land uses that may be necessary to accommodate the proposed bicycle lanes/routes, especially if widening is required.

F-4

- Address the safety of bicyclists in the bike paths, lanes, and routes in the locations proposed in the City of Industry. Specifically, is it safe to ride bicycles on the streets in the City of Industry given the volume of trucks/vehicles and roadway configurations?

F-5

- Discuss methods for incorporating local preferences.
- Provide alternative bicycle facility types, widths, or configurations.
- Address the provision of flexible designs and alignments that respond to local conditions.

F-6

In regards to the bicycle paths proposed along the San Jose and Puente Creeks, the City has been coordinating closely with the Watershed Conservation Authority, the County of Los Angeles Department of Parks and Recreation, Los Angeles County Flood Control District, local jurisdictions, SGVCOG, and other stakeholders studying an east-west bicycle connector along the two creeks. The City of Industry provided the following feedback in the attached letter dated March 17, 2011 to the coalition so that a bike path can be designed that addresses our unique circumstances:

- The path will remain in the creek channel right-of-way (channel and paralleling maintenance roads) and there will not be mid-block crossings within the City.
- Pocket-parks and rest-stops will not be located within the City.
- The City will not be responsible for the financing, planning, engineering, construction, or maintenance of the bike path.
- Grants and funding sources will not limit or restrict the planning or use of the San Jose Creek Channel for other purposes, such as truck/vehicular transportation.

The Draft County of Los Angeles Bicycle Master Plan and the PEIR should consider these factors in the design and analysis of bike paths in the City of Industry. Specifically, the PEIR should address the potential impact to the level of service on city streets and the safety of bicyclists. In addition, the PEIR should address the land use and security implications of locating a bike path along the back-side of businesses.

Thank you for your consideration and please feel free to contact me should you have any questions or concerns.

Sincerely,

John Ballas
City Engineer

JDB/BJ:mk

Enclosure

Page 2 of 2

CITY OF INDUSTRY

P.O. Box 3366 • 15625 E. Stafford St. • City of Industry, CA 91744-0366 • (626) 333-2211 • FAX (626) 961-6795

MEMORANDUM

To: East-West Trail Technical Advisory Committee March 17, 2011

From: Brian James, Senior Planner

Subject: San Jose Creek Channel Trail Connection

General Comments
In theory, the City of Industry can support a bike path within its boundaries on the San Jose Creek under certain conditions. Due to the function of the City's streets as truck lanes, inadequate outside lane widths to support bike lanes, safety concerns, high traffic levels (especially regional traffic levels on north-south streets), and the need to preserve security on the back-side of businesses within the City, the City can support a bike path in the San Jose Creek channel within its boundaries under the following conditions:

- The bike path stays in the creek channel
- There are no mid-block crossings
- There are no pocket-parks and rest-stops
- The City is not responsible for the financing, planning, engineering, construction, or maintenance of the bike path

Please note that SCAG is also proposing a truck by-pass on the San Jose Creek and the City will not support a bike path wherein the funding or conditions preclude a truck bypass option. We strongly urge that the design for these facilities be coordinated. F-6

Tour Comments

- Point of Interest 2: The City discourages bicycling on its streets due to insufficient outside lane width and safety concerns. In the pending General Plan update, Staff is proposing that the bicycle travel be accommodated on its sidewalks. Any trail connecting to City streets would have to include clear notification and directional signage to this effect.
- Point of Interest 3: There is an approved container storage and logistics development on this site. Due to security concerns, the City will not support a bike path that includes park facilities and rest stops in its boundaries.
- Point of Interest 4: The City discourages bicycling on its streets due to insufficient outside lane width and safety concerns. In the pending General Plan update, Staff is proposing that the bicycle travel be accommodated on its sidewalks. Any trail connecting to City streets would have to include clear notification and directional signage to this effect.
- Stop 1: It is the City's understanding that the Shabarum Trail is abandoned.
- Stop 2: The City's boundary wraps around this intersection. The City of industry can support a bike path in the creek channel as long as it stays in the creek channel and there are no mid-block crossings.
- Stop 3: The City discourages bicycling on its streets due to insufficient outside lane width and safety concerns. In the pending General Plan update, Staff is proposing that the bicycle travel be accommodated on its sidewalks. Any trail connecting to City streets

Page 1 of 2

would have to include clear notification and directional signage to this effect.

Alternative Route
The City suggests that an alternative route along the Puente Creek be explored (see attached map). This route has the following benefits:

- It is routed largely through residential neighborhoods with pedestrian-level commercial and service amenities befitting bicycle travel
- It would connect to the shopping center in and around West Covina's Field of Dreams on Azusa
- It avoids the fractured ownership patterns of the San Jose Creek through the City of Industry
- It may avoid the condition that the trail stay within the creek channel, which may make mid-block crossings feasible on less heavily traveled streets.
- It avoids the "back-of-shop" conditions though the City of Industry and may be more scenic.
- It avoids security concerns of business that store materials and goods along the creek channel.
- The San Jose Creek west of the Puente Creek is wide enough (205'+) to accommodate the truck lanes as well as a bike path. As you head east of Puente Creek the right of way gets much tighter (120' +/-) and it would be a design challenge to have both facilities sharing the flood control right of way.

F-6

Response to Comment F-1
Requesting changes to bikeways in the Bicycle Master Plan

This comment requests changes in the project description (the Bicycle Master Plan), stating that the City of Industry is concerned about safety of bicyclists and preservation of the current level of service (LOS) on the roadways. The comment does not provide any evidence for LOS impacts. As discussed in Section 3.6 of the Draft PEIR, "Traffic and Transportation," detailed analysis of traffic impacts will be required prior to implementation of any of the individual Bicycle Master Plan projects that would require closure of lanes, widening of existing roadways, or other changes to a roadway that would affect traffic. Mitigation Measure MM 3.6-2 requires implementation of traffic study recommendations and requires that LOS be maintained at acceptable levels.

Response to Comment F-2
Providing design recommendations for a project in the Bicycle Master Plan

The comment includes specific design recommendations for the proposed San Jose Creek Bicycle Path. These detailed design recommendations are outside the scope of the PEIR but will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

Response to Comment F-3
Requesting that the PEIR address land use impacts of widening roadways to accommodate bikeways

The Draft PEIR did not address land use issues. During the Initial Study, it was determined that the Bicycle Master Plan would not have the potential to result in significant impacts to land use. No comments were received during the comment period on the Initial Study (scoping period) providing evidence that significant land use impacts may occur as a result of the Bicycle Master Plan. The comment also does not provide evidence that significant land use impacts would occur.

Widening to accommodate bikeways would be minor and would not be expected to result in changes to land use on adjacent properties.

Response to Comment F-4
Requesting that the PEIR address safety of bicyclists in the City of Industry

As stated in the response to Comment F-1, detailed analysis of traffic impacts (including safety) will be required prior to implementation of any of the individual Bicycle Master Plan projects. This analysis is only possible when the specific bikeway designs are available, at the project level.

Response to Comment F-5
Requesting that the PEIR discuss methods for incorporating local preferences, alternative configurations, and flexible designs

The PEIR is not the correct venue for incorporating local preferences, alternative configurations, or flexible designs, except as mitigation for significant impacts. Otherwise, these methods are part of the planning process for the Bicycle Master Plan. The Draft PEIR analyzed the impacts of the

Bicycle Master Plan but is separate from the planning process for the Bicycle Master Plan. Because this comment does not identify any environmental issues, no response is necessary. The comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

Response to Comment F-6

Providing a summary of earlier recommendations on bicycle path designs along the San Jose and Puente creeks and requesting consideration in the PEIR (previous letter to the East-West Technical Advisory Committee attached)

The previous correspondence that is summarized in the comment was part of the planning process for the Bicycle Master Plan, and precedes the environmental process (dated March 17, 2011, with the Notice of Preparation for the PEIR filed April 4, 2011). The summary does not address environmental issues, but rather addresses design and funding issues. Because this comment does not identify any environmental issues, no response is necessary. The comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

2.3.7 Commenter G: Los Angeles County Bicycle Coalition (Lantz)

Commenter G

Los Angeles County Bicycle Coalition
634 S. Spring St. Suite 821
Los Angeles, CA 90014
Phone 213.629.2142
Facsimile 213.629.2259
www.la-bike.org

LACBC

September 23, 2011

Ms. Reyna Soriano
Los Angeles County Department of Public Works
Programs Development Division, 11th Floor
P.O. Box 1460
Alhambra, CA 91802-1460

Re: Comments on Draft Program EIR for Los Angeles County Bicycle Master Plan

Dear Ms. Soriano,

The Los Angeles County Bicycle Coalition (LACBC) appreciates your department's efforts in creating the County of Los Angeles Bicycle Master Plan. We wholeheartedly support the goal of making Los Angeles County bicycle-friendly so that more County residents are able to ride bicycles for both transportation and recreation. Increasing bicycling will simultaneously address the congestion, public health, and environmental challenges facing Los Angeles County. With these goals in mind, LACBC feels strongly that the plan does not go far enough. The plan lacks ambition in its mode share targets and its policies are vague and noncommittal. The plan also does not discuss innovative bicycle facilities that have proven successful in other cities in the United States, or even locally in Long Beach. A 20-year plan that does not account for facility designs likely to be approved in the next few years and will rapidly become out of date. The plan is a step in the right direction, but without more defined policies and firmer commitment to implementation, the plan is at risk of gathering dust as soon as it is passed. In June, LACBC provided both general comments and specific suggestions for improved policy language and map additions. That letter and attachments are hereby incorporated by reference into these comments. G-1

In addition to our June letter, LACBC has reviewed the Draft Program Environmental Impact Report (EIR) and offers the following comments:

Implementation of Bicyde Master Plan will improve safety for all road users

Project benefits described on page 2-3 and again on page 5-1 should include the safety benefits that accrue to all road users from the implementation of well-designed bicycle facilities. For example, adding bike lanes to a street can calm traffic and result in fewer overall collisions for motorists and pedestrians, in addition to bicyclists. Innovative bicycle facilities can further enhance these traffic-calming effects. G-2

Traffic impact guidelines are inappropriately applied to bicyde projects

The transportation impacts section should include a more refined discussion of the County's thresholds of significance and prospective changes to LOS standards in the future. As written, the adopted County guidelines only address "traffic generated by a project" as a potential impact. Bicycle facilities do not add vehicle trips to a roadway. The current guidelines did not contemplate a "road diet" scenario, wherein a travel lane is removed in favor of a bicycle lane, which does not "generate traffic" but may have localized effects on congestion. The broad misapplication of these guidelines will have a substantial effect on implementation of the plan. If nothing G-3

else, the poor wording of the guidelines illustrates just how out of date they are. The EIR should at least acknowledge that it is applying thresholds of significance to projects they were never designed for.

This EIR is being written during a paradigm shift in transportation planning, where people are counted rather than cars. The EIR says as much when listing Draft 2035 General Plan Update policies from the Mobility Element, of which this bike plan will become a part. Policy M 2.6 reads, "Support alternative level of service (LOS) standards that account for a multi-modal transportation system." The EIR should discuss the need for such a change and explain how a multi-modal threshold would treat bicycle projects, particularly road diets. Because this EIR covers a 20-year time horizon, it is reasonable to expect it to anticipate and address changes to how impacts are evaluated during this time period. Without this more detailed discussion, it will be difficult for subsequent environmental review of individual projects to tier off this program EIR once standards are changed in the future. G-3

Additional program-level review warranted for road diets

The EIR should not make a blanket assertion that removing a travel lane constitutes a significant impact. Given the sensitivity of this issue, a more refined analysis is warranted at the program level. The EIR should discuss the conditions under which removal of a travel lane will or will not result in a significant impact. For example, standard 4-to-3 road diets that install a center two-way left turn lane do not necessarily reduce overall vehicle capacity. In fact, the addition of a left turn lane can reduce delays significantly. The EIR should propose thresholds under which removing a travel lane is not considered a significant impact so that those projects can proceed with minimal delay. Including these thresholds at the program level will reduce the need for expensive review for each individual project and be more cost-effective in the long term. G-4

Traffic mitigation measures undermine plan implementation

Mitigation measure MM 2.6-2 threatens the effectiveness of the entire Bicycle Master Plan. It is wholly inappropriate to include "dropping" projects from the master plan as a mitigation measure. In light of the aforementioned problems with current LOS metrics, basing the fate of a substantial number of projects on a flawed measure sets the plan up for failure. Unfortunately, this mitigation measure presents itself as an easy out for the County to abandon critical projects just because they are too challenging. The mitigation measure should be revised to eliminate the fourth bullet point. G-5

Discussion of parking impacts should be more sophisticated

The EIR discusses impacts to parking supply in a simplistic way that does not reflect current best practices in parking management. Per *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco (2002)*, as cited on page 3.6-90, a parking "shortage" is not an impact, but a symptom of mismanaged supply. To that extent, mitigation measure MM 3.6-3 does well to recommend conducting parking studies that can address these issues in a comprehensive way. However, the mitigation measure must clarify that it is only applicable where parking removal is anticipated to affect traffic conditions, not in all cases. Additionally, the mitigation measure should specify that only a Class III bike route demarcated by sharrows would be appropriate in this example. G-6

No Project Alternative needs more elaboration G-7

On page 5-2, the EIR makes an unsupported assertion that certain bikeway projects in the existing *Plan of Bikeways* are either not feasible or no longer "meet the current needs of the biking public." Without a list of such facilities proposed by the existing plan and not carried out, it is impossible for the public to evaluate these claims. At the very least, such a list would provide insight into the County's effectiveness at implementing the previous bicycle plan. G-7

Thank you for your consideration of these comments. If you have any questions, I can be reached at 213.629.2142

Sincerely,

Alexis Lantz
Planning & Policy Director
Los Angeles County Bicycle Coalition

Los Angeles County Bicycle Coalition
634 S. Spring St. Suite 821
Los Angeles, CA 90014
Phone 213.629.2142
Facsimile 213.629.2259
www.la-bike.org

June 3, 2011

Abu Yusaf
LA County Department of Public Works
Fremont Blvd
Alhambra, CA

Re: Comments on Draft County of LA Bike Plan

Dear Mr. Yusaf,

We thank you and the Department of Public Works for your hard work on the 2011 Draft County of Los Angeles Bicycle Plan. We are pleased to see the County move forward with developing a comprehensive bicycle plan for the unincorporated communities of the County. We appreciate the span of this plan and its attempt to provide for each individual community within the unincorporated communities, which differ dramatically in geography, density, and need. We want to ensure this plan is well-constructed in order to create a cohesive, countywide bicycle network, to enrich travel for people who bicycle throughout the Los Angeles area. For this reason we are writing to you to address concerns we have regarding the plan that we feel keep it from achieving this goal.

The Los Angeles County Bicycle Coalition believes this plan should provide more miles of bicycle lanes, bicycle boulevards, and standard treatments such as Sharrows. Additionally, we want to see the DPW work to create safer and more appealing streets for bicycling by outlining a program for piloting innovative bicycle safety design features such as cycle-tracks, bicycle boxes, and better integrating Complete Streets elements into the design guidelines and identified projects.

The design guidelines in the Draft Plan do not provide for safer streets for all users. Rather, they continue to perpetuate the unsafe streets we have today. The Draft Plan should provide a vision for Complete Streets by incorporating policies, programs and design guidelines that prioritize bicycle and pedestrian safety. DPW's usage of the Caltrans Highways Design Manual is problematic because it applies highways standards to local roads. The State of California does not provide a current standard for minimum travel lanes on local roads; travel lane widths are a matter of local preference and practice. Widths should not only be based on sound engineering principles, but also on the adjacent land uses and community needs. For this reason we demand DPW move away from the Highway Design Manual. At a minimum, we request you familiarize yourself with the Chapter 21 of the Caltrans Project Development Procedures Manual that outlines how to document and justify exceptions to the HDM. G-8

We believe DPW can better achieve safety of people on bicycles or walking by revisiting the design guidelines in the Plan and providing for a range of travel lanes widths between 9' to 12' even on arterials and seek to narrow travel lanes wherever possible based on vehicle and transit volumes to accommodate more miles of bicycle lanes and shorten crossing distances for pedestrians. Narrowing travel lanes directly

correlates with managing travel speeds: wider lanes equal faster travel speeds, and narrower travel lanes can encourage motorists to actually drive the posted speed limit. Designing a lanes widths based on highway principles encourages highway speeds. The majority of the roads in the County have speed limits under 40 miles per hour, so DPW should ensure the roads are designed to reflect this.

Reflecting the issue of poor roadway design is the number of collisions involving people who bicycle in the unincorporated communities. Within the unincorporated areas there are many dense urban unincorporated communities with large populations of transit dependent residents who bicycle and walk to access transit and meet their daily needs. These communities also represent the areas with the highest amount of collisions involving people on bicycles. Over 2600 collisions involving people on bicycles took place in the unincorporated communities between 2004 and 2009. 20% were in the Metro Planning area. Of those, 43% were in East LA and 11% were in East San Gabriel Valley area. Based on the density and number of collisions, the projects in these areas should be prioritized for implementation to address this horrific safety issue.

The Plan should outline its strategy for measuring the success of the programs and policies it implements. In the evaluation section of Chapter Three, for example, the Plan should establish goals for mode share increases, annual bikeway mileage increases, decreases in greenhouse gas emissions, and set a goal of zero deaths and annually measure decreases (or increases) in collisions leading to injury or death. Providing transparency on how the County is working to improve the safety of its citizens while bicycling and walking is imperative to build support for the implementation of many of the projects in the Plan. To provide greater transparency DPW should prepare quarterly and yearly progress reports to the County Supervisors, the County BAC, and public on the status of projects, programs, and implementation using the metrics we have outlined. G-8

To ensure that the vision in this plan actually comes to fruition, Chapter Five: Funding and Implementation must be overhauled. There are three main problems with this chapter. First, it makes no plan for actual implementation. When will the county build this bicycle infrastructure? Who within the county will be responsible for its completion? Second, the prioritized lists conflict with one another, calling into question what meaning they will actually have once the plan is passed. We call for a public process to resolve the inherent conflicts between prioritization based on project utility, project costs and difficulty, and geopolitical equity. It is deceptive to combine these three conflicting criteria into a single ranked list. Finally, the metrics that will measure the plan's success are flawed. We call for a revision of these metrics to focus on a) things that the county can actually control and b) metrics that truly indicate an increase in bicycle mobility and safety.

As mentioned previously, we realize much of the implementation depends on grant funding, however Chapter five lacks an implementation timeline, and does not specify that DPW will be responsible for implementing bikeways. LACBC believes the Plan needs to commit to implementing a specified amount of bikeways every year. We are incredibly disappointed to see that 20 miles of Bicycle Boulevards will take 20 years to be implemented. This is entirely unacceptable. Twenty miles should be implemented in five years or less, not 20 years. Bicycle Boulevards are by far some of the easiest projects in this plan to implement. In addition to including more miles of Bicycle Boulevards, their implementation should be expedited. We realize much of the Plan implementation is dependent on grant funding, but these projects offer multiple

benefits and can be funded through multiple sources leading to faster implementation.

Our concern with bikeway implementation resembles our concern with the policies and programs: a plan that does not answer the questions "when?" and "who?" will sit on the shelf and gather dust. Chapter Five should set mileage goals for bikeways per year. It should lay out a detailed implementation plan and require a specific body within the county, DPW or an interdepartmental committee to report annually on how implementation is progressing. Furthermore, the implementation plan should specify a public process similar to the monthly meetings of the Bicycle Plan Implementation Team in the City of Los Angeles. The public must be able to inform both the prioritization of the projects that will next be implemented, as well as the engineering designs. This will allow local community members to participate in the changes that the Bike Plan will bring to their community. It will also bring transparency and democracy to the Bike Plan implementation process.

We reject the prioritization schema in Chapter Five and call for its complete overhaul. First, we reject all one-dimensional rankings of projects. Clearly a bicycle infrastructure project has many aspects, including which supervisorial district it is located in, how much it will cost, what destinations it reaches, the socio-demographics of the neighborhoods through which it passes, and how much community support it has. To facilitate a real discussion of this information, we should not collapse it in to a single figure.

Second, the plan never explains how the prioritization ranking will be used. It is not clear that the prioritized list will ever come to have any meaning in terms of which projects get implemented first, or which projects are included in funding applications.

Third, Chapter Five presents two contradictory prioritization schema: the first relies upon project utility (connectivity, etc) and produces the ranked list in Appendix I, and the second is the "Top 17" list that aims to include an equal number of projects in each of the all five county supervisorial districts. The plan does not admit or address the fact that these two prioritization methods are in conflict. For example, the top four projects on the "Top 17" district-based list are ranked 49, 19, 28, and 23 respectively in Appendix I. The "Top 17" list includes a project ranked as low as 59 in Appendix I. As we pointed out earlier, areas with the greatest density and highest need should be prioritized. We are concerned about the degree to which high-utility projects located in the dense urban areas of the county are being displaced from the "Top 17" list in the name of geopolitical equity. The projects ranked 10-17 in Appendix I are all excluded from the Top 17; all of them serve dense, low-income communities where many people do not have cars and where bicycle infrastructure can do much to improve mobility. If the Top 17 is a template for how the County will be prioritizing projects internally, it does not bode well for urban and low-income communities. We feel this means one of these lists is the real priority list while the other is only included for technical flair.

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To resolve all of these problems, we again call for a public process to shape project prioritization and implementation. The county should invite residents who bicycle, county district representatives, representatives from neighboring jurisdictions, and members of the local communities through which planned bicycle projects run to participate in choosing and implementing projects. This way, the conflicts between jurisdictional equity and project utility can be resolved in a transparent, democratic, and ongoing manner. Moreover, such a committee will be a forum for the kind of cooperation that implementation of

this plan will require, since it spans such odd geographical areas and shares boundaries with so many other jurisdictions.

We agree that it is important to employ measures of effectiveness in order to monitor the County's progress toward becoming a bike-friendly place. However, the measures in Table 5-1 are the wrong metrics. Of the six metrics outlined in the Plan only two should be kept: the number of miles of bikeways, and the proportion of arterial streets with bike lanes. The four remaining metrics need to be either modified or discarded.

While we agree that one of the metrics should capture the levels to which people are actually bicycling, bicycle commute mode share is a very flawed way to measure this. Commutes only account for 16% of all trips, and commutes are often some of the longest trips people have to take, making them more difficult to take by bicycle. Trips to the store, to school, to and from transit, to visit family and friends, and to parks and recreation are all excluded by this measure. The plan should utilize biennial counts as called for in the Plan instead at a variety of locations to capture all manner of bicycle trips. Repeated counts will indicate whether bicycling is going up or down across LA County. Counts also provide an opportunity to examine before and after usage statistics when bicycle infrastructure is built, and to collect information on riding behavior, gender, and age.

Similarly, while we agree that the County should aim to reduce bicycle collisions, it is important that this metric be normalized by usage. Otherwise, this metric will mislead. It is possible to dramatically reduce bicycle collisions simply by reducing the extent to which people choose to ride a bicycle. Some of the most dangerous locations in Los Angeles County have very few bicycle collisions on them because people intentionally avoid bicycling in these places. The ideal metric would be bicycle collisions per mile of bicycle travel, but since this information does not exist, a better metric than just bicycle collisions would be bicycle collisions per bicycle commuter. G-8

LACBC wants to ensure that the 2011 Bicycle Plan maximizes infrastructure as well as education programs to improve the safety and quality of space for bicyclists. Indeed, the Plan should regard safety as the number one priority. For this reason we would like to see a program included under Goal 2, to offer bicycle safety courses for people on bicycles who receive traffic citations (for anything other than DUI) in lieu of paying a fine or other pecuniary penalties. Instead, they could pay a fee to attend a court-required bicycle safety course. As we have folks taking to the streets everyday with no formal training on the rules of the road as they apply to bicycling, a program of this nature will ensure more people receive safety education instead of just fines, and work to lower collisions and increase safe bicycling. We also feel the County needs to hire a Bicycle Plan Coordinator - someone with planning, grant writing, and community organizing experience - to oversee the implementation of all of the Plan's education and encouragement programs, oversee grant applications, and help create a link between Regional Planning and the Department of Public Work's Transportation Engineers. This staffer needs to be well versed in Complete Streets and bicycle and pedestrian innovation.

Essential to implementation is providing more information on the County Department of Public Works website. We are glad to see this called out in the Plan. However, it is misleading to state that the timeline for this program is "ongoing," since DPW does not yet provide bicycle information through its website.

Just to name a few examples, we feel the following elements are greatly needed on the DPW website: a way to request bicycle parking racks through the Request for Service page, Bicycle information through the Resident portal that links County residents to safety information, maps, additional resources, what projects are being worked on, when projects are completed, the time and location of County BAC meetings, closures to any County bicycle facilities. Currently there is not even a link to the Plan update on the front page of the DPW homepage. We also encourage DPW to provide a link to bicycle information on the business portal under transportation and include information on ways to accommodate and encourage bicycle commuters, such as providing short and long term bicycle parking.

Improved communication and coordination among County agencies such as LAC Department of Parks and Recreation, LAC Flood Control, and the neighboring jurisdictions' departments of transportation or public works is needed. This should be accomplished through regularly scheduled meetings, posting project schedules online, and updates from those agencies to the LA County BAC. This should be outlined as a policy in the Plan under Goal 1. Specifically we encourage DPW to work closely with DPR to better publicize and provide maps of existing multiuse paths. It is our understanding that DPR does not currently provide their trails to Google, while your agency does. While many DPR trails are unpaved, DPW should work with them to identify paths that can provide bicycle access opportunities in addition to equestrian and pedestrian access. Additionally, the County Flood Control District controls access to our waterways; DPW should be working with FCD and neighboring jurisdictions to implement bicycle and pedestrian paths along these rights-of-way to provide safe commuting and recreational facilities that connect our communities and provide all LA County residents greater access to open space. While the Plan identifies waterways in the unincorporated communities, it does not outline how DPW will work to create cohesive networks on our waterways by engaging in continued dialogue through monthly, quarterly, yearly, or project-based meetings with Flood Control and neighboring jurisdictions. A template for this kind of engagement is the LA River Committee. We suggest a similar program be established so that DPW and communities with rivers, creeks, and streams that are controlled by DPW Flood Control can start implementing or planning paths. G-8

Attached you will find a list of LACBC's comments on the policies outlined in Chapters 2, 4, and 5 of the Draft Plan. Many of the comments call for further explanation, clarification, and question the time period specified. In general, we feel many of the policies, if implemented, will create a much more bicycle friendly Los Angeles County, however many of these policies need further elaboration. We also question the time periods specified since many of the programs are not currently implemented, so to say a program is "ongoing" is a misnomer. Likewise, no program or policy should be listed as TBD. This is unacceptable. Specify the years a program will begin and end for every program and policy in the plan. We have also attached a list of streets we feel should be included in the plan or upgraded from routes to lanes based on comments we received from LACBC members around the County.

Thank you for your time and consideration. We expect to see our comments integrated in to the final Plan and we look forward to working with the LA County Department of Public Works on implementation of the County of Los Angeles Bicycle Plan. By engaging in an ongoing, constructive dialogue, the County can develop a successful bicycle network that all residents of Los Angeles County can enjoy. We look forward to future communications regarding the Draft Plan and are eager to see a better, bike-able Los Angeles County!

Sincerely,

Alexis Lantz
Planning & Policy Director

LACBC Comments on the 2011 LA County Bicycle Plan Policies

Chapter 1 Page	Section	Draft Text
3		"The implementation of this plan will start in year 2012 after the appropriate environmental review required by the California Environmental Quality Act (CEQA)."
4	1.1	
4	1.1	

Chapter 2 Page	Policy	Draft Text
11-17	Overarching comments regarding all policies	
11-17	Overarching comments regarding all policies	
11-17	Goal 1	

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11-17	Goals 1, 2	
11-17	Goal 6	
11	1.1	"Construct the bikeways proposed in 2012 County of Los Angeles Bicycle Master Plan over the next 20 years."
11	1.1.1	"Propose bikeways that connect to transit stations, commercial centers, schools, libraries, cultural centers, parks and other important activity centers within each unincorporated area and promote bicycling to these destination."
11	1.1.3	"Implement bikeways proposed in this Plan when reconstructing or widening existing streets."
11	1.1.4	"Implement bikeways proposed in this Plan when completing road rehabilitation and street preservation projects, if the proposed bikeway can be added within the existing roadway width without a reduction in vehicular lanes or removal of parking."
11	1.2	"Enact changes in the County Codes and Land Uses that encourage additional bikeways and bicycle support facilities."
12	1.3	"Coordinate with developers to provide bicycle facilities that encourage biking and link to key destinations."

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12	1.4.3	"Encourage end of trip facilities at key destinations."
12	1.5	"Complete regular updates of the Bicycle Master Plan to be current with policies and requirements for grant funding and to improve the network."
12	1.5.1	"Measure the effectiveness of the Bikeway Plan implementation."
12	1.6	"Develop a bicycle parking policy."
13	1.6.3	(proposed new policy)
13	1.6.4	(proposed new policy)
13	1.6.5	(proposed new policy)
13	2.2.2	"Implement the bicycle boulevards proposed by this Plan."

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13	2.3.1	"Encourage enforcement of traffic laws including citing bicyclists, pedestrians and motor vehicle operators consistently for violations to enhance bicyclist and pedestrian safety."
14	2.3.2	"Encourage targeted enforcement activities in areas with high bicycle and pedestrian volumes."
14	2.4	"Evaluate impacts on bicyclists when designing new or reconfiguring streets."
14	2.4.1	"Encourage the development of traffic study criteria that account for bicyclists and pedestrians."
14	2.4.2	"Explore the feasibility of conducting biennial counts of bicyclists on key bikeways to gauge the effectiveness of the County's bicycle facilities in increasing bicycle activity."

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14	2.5, 2.5.2	"Continue to support the County's Suggested Routes to School program."/"Develop incentive programs for students who participate in the Suggested Routes to School Program."
14	2.5.1	"Implement improvements that encourage safe bicycle travel to and from school."
15	3.1/3.1.1	"Provide Bicycle Education"/"Offer bicycle skills, bicycle safety classes, and bicycle repair workshops."
15	3.2	"Consider safety education campaigns aimed at bicyclists and motorists (e.g., public service announcements, brochures, etc.)."
15	3.3.1	"Educate designers on the need of bicyclists."
15	3.3.3	(proposed new policy)

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16	4.2.2	"Investigate options for incentivizing county employees to use bicycles and othe non-auto modes of transportation to commute to work."
16	4.3	"Develop maps and wayfinding signage and striping to assist navigating the regional bikeways."
16	5.1.1	"Establish a community stakeholder group to assist with the implementation of the Bicycle Master Plan."
16	5.2	"Create and online presence to improve visibility of bicycling issues in unincorporated Los Angeles County."
17	6.1.1	"Support innovative funding mechanisms to implement this Bicycle Master Plan."
17	6.1.4	"Consider using bikeways as mitigation for project-related vehicle trips."
17	6.1.5	(proposed new policy)

Chapter 4 Page	Policy	Draft Text
133-140		

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133	4.1.1	"The Los Angeles County Bicycle Coalition (LACBC) currently offers adult League of American Bicyclists (LAB) courses taught by League Certified Instructors. The County can partner with the LACBC and other non-profit organizations to expand course offerings, incorporating them into recreation center programs or other County programs."
134	4.1.2	Youth Bicycle Safety Education
135	4.1.3	Bicycle Rodeos
135	4.1.4	Share the Path Campaign
136	4.1.5	Bicycle Public Awareness Campaign
136	4.2.1	Bicycle Patrol Unit
137	4.2.2	Bicycle Light Enforcement
138	4.3.1	"Maps can be distributed by school officials to parents to encourage their children to walk or bike to school...."

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Recommendation
This language is problematic because it is vague and implies that the County will not implement any part of the plan until all environmental reviews are completed. Depending on the duration of the CEQA review, implementation of the plan could be delayed months or years.

The plan is proposing only 69 miles of bike path (Class 1), 225 miles of bike lanes (Class 2), and 381 miles of bike routes (Class 3), or 675 miles total, for the County's 2,656.6 square miles over 20 years. This total is woefully insufficient, especially considering that the County currently has only 100.3 miles of Class 1 facilities, 20.2 miles of Class 2 facilities, and 23.5 miles of Class 3 facilities.
The plan claims that the 225 miles of bike lanes will cost $95.7M -- more than the Class I and III facilities combined. This sum seems exorbitant for the mileage proposed.

Recommendation
With all of the policies and programs is the lack of explanation on how the County will address and implement these programs and policies. There should be at least a paragraph/3 sentences that describe the policy or program, and how the County will work with other agencies, community, etc. to meet these goals and implement these policies.
No program or policy should its timeframe described as "TBD" or "ongoing," particularly if implementation of the program has not yet begun. The County needs to pick dates that programs/policies will be addressed, provide a start year and through or completed-by year.

Goal 1 - Bikeway System - should include a policy such as, "To accommodate bicycle lanes in more communities the County will document exceptions to 12' and 11' lanes standard indicated in the California Highway Design Manual." The majority of unicorporated communities are built out and roadways cannot be widened in order to accommodate bicycle lanes. To create Complete Streets and safer streets the County will need to narrow vehicle travel lanes to provide bicycle lanes. This will improve the overall safety of the roadway by design lanes that better correspond to posted speed limits. (This should also be shown in the design guidelines, which should provide a range from 10 to 12 feet for inside lanes.)

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The plan should include a policy to "Implement innovative infrastructure treatments that can further increase the safety of people bicycling." The County will develop pilot projects to test the use of protected bicycle lanes on Major Class II or secondary roadways to improve bicycle safety on heavily traveled roadways. The County will apply to the Federal Highways Administration to participate in on-going Federal infrastructure pilot studies and will also seek approvals from the California Traffic Control Devices Committee.

Include a policy for a Yearly Funding and Implementation report to be prepared and presented by DPW staff to the Supervisors at a Board Meeting listing what grants were applied for with which projects, explaining if they received funding, and if not, providing detailed information from the grantors as to why they did not receive funding and how they can improve the grant applications for the next cycles. In addition, DPW staff should be reporting on project implementation including metrics on: collisions compared to ridership, ridership levels, detailed summaries of what programs and policies have been implemented or started, how many people they have reached through education campaigns (e.g., how many kids were given safety training, etc). This will provide the County with an opportunity to promote its successes, provide more transparency, evaluate their progress, and identify where improvement is needed.

The plan should specify mileage targets/goals for each breakdown. (It's acceptable to list that many projects will be dependent on grant funding and reference the relevant funding section of the plan.)

Change "Propose" to "Prioritize."

County should work within existing right of ways and discontinue road widening projects. It should better incorporate Complete Streets throughout the unincorporated areas through the implementation of the bike plan projects.

This policy should also include implementing projects that may result in the removal of a travel lane or parking or just the narrowing of existing travel lanes; new striping plans that include bicycle lanes should be developed in line with street resurfacing and rehabilitation projects, as this will save money.

Please elaborate on the method for fulfilling this policy.

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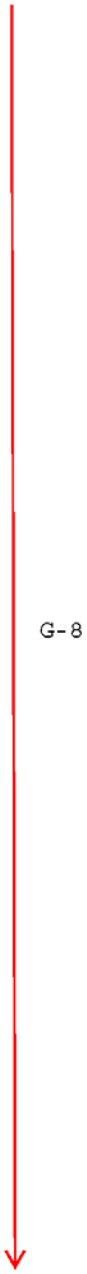

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Please elaborate -- what types of facilities will be encouraged? Bike parking, showers, locker rooms, etc.?

Please elaborate on the method for fulfilling this policy.

Please elaborate. How will the County measure the effectiveness? Also, staff will report to the County Supervisors and the public with a yearly report on the progress of the bicycle plan implementation. (See comment above regarding Goal 6.)

Please elaborate. This policy needs to be expanded into several bicycle parking policy elements, addressing existing buildings, new developments, county inspector education, etc. County will conduct audits of existing county-owned buildings to improve the quality and siting of existing bicycle parking. County will develop a sidewalk parking program that will allow businesses, communities, and constituents to request bicycle parking. County will provide a way to request bicycle parking through the DPW website and provide information to businesses through the Supervisor's email newsletters, various Chambers of Commerce in the unincorporated areas, etc.

"County will work to create bicycle parking standards for developers, the school district, etc. to provide guidance on the proper siting and type of bicycle parking to install. This guide will provide visual guidance as well as siting checklists that can be used by both building inspectors and developers. County will work to educate building and safety inspectors to ensure they understand where and what types of bicycle parking are acceptable as per this plan."

"County will work with the School district to inventory all existing bicycle parking and work with the district to provide better parking to encourage more students to bicycle to school. Where feasible, the County and school district may want to provide a bicycle parking room that can be locked during school hours to ensure bicycles are safe and untampered with during the school day."

"County will work with Parks and Recreation to inventory all existing bicycle parking and provide better parking to encourage more people to bicycle to parks."

There are only 20 miles of bicycle boulevards included in this plan. These should be the easiest projects to implement in the plan; if you cannot implement these in the next 2 years, you have failed this plan and you constituents. Your goal should be to implement all 20 miles by no later than 2014.

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The County needs to provide an education component for people walking and bicycling (e.g., issuing warnings and providing education). It should expand on this goal: "County will work with Sheriff's Dept to provide education materials and/or safety courses for people who walk or bicycle that are found to be conducting unsafe behavior. County and the Sheriff's Dept realize that many people bicycling may not have ever received education on the rules of the road when operating a bicycle."

"Targeted enforcement" of whom? Motorists? Bicycle and pedestrian users? Please define what this policy means. For example: "County will work with Sheriff's Dept to target enforcement of motor vehicle behavior in areas with high bicycle and pedestrian use. Through targeted speed, distracted driver, and dangerous driving enforcement in these areas, the County and Sheriff's Dept's goal is to decrease collisions involving pedestrians and bicycles in these high usage and collision areas."

Please elaborate on the method for fulfilling this policy. For example: "County will work with developers, County engineers, Caltrans, Metro, and other agencies that can effect the roadway to ensure the mobility of people who bicycle (or walk) is improved when designing or reconfiguring a roadway. This includes requiring bicycle and pedestrian counts, adopting better CEQA traffic analysis measurements that look at reducing vehicle trips with new developments through improving connections to transit, walking and bicycling, and adopting new level of service measurements for County Engineering analysis."

Change "Encourage . . ." to "Adopt a Multi-modal level of service traffic analysis criteria. . . ." Also, please elaborate the method for fulfilling this policy. For example: "Currently, the County uses a Level of Service measurement to analysis traffic impacts that does not capture data on bicycle and pedestrian activity. A multi-modal level of service will analysis the impacts of all roadways users and provide the county with a better picture of how different traffic treatments will improve or hinder bicycle and pedestrian mobility, transit mobility, and vehicle mobility."
Change "Explore the feasibility. . ." to "Conduct biennial bicycle (and pedestrian) counts on existing routes, proposed routes, near transit, and key intersections to provide data on ridership (e.g., how bicycle infrastructure is increasing bicycle ridership, where ridership is highest, etc.)."

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Change "Continue to support Suggested Route to School Program" to "Improve and Enhance the Suggested Routes to School Program." Revise and improve maps to be more legible for people under the age of 12. Elaborate on this program and combine with Policy 2.5.2: "County will work with County School District to provide information to parents, faculty, students, and staff on creating Safe Routes to School Encouragement programs such as walking school buses, bike trains, creating Walking Wednesdays or Two-wheel Tuesdays. County will develop an encouragement template for County schools and parents to implement based on national best practices."
Change to: "Prioritize improvements within a 2 miles radius of schools in LA County area to create safer streets for students who bicycle to school."

Please elaborate. Who will the County educate? For example: "County will provide bicycle education for both children and adults through the Department of Recreation and Parks in partnership with Department of Public Works, the School District, and in coordination with local community organizations." Also, combine with policy 3.1.1: "County will work to offer at least four free bicycle commuting safety courses for adults each year. In coordination with County School District the County will provide bicycle safety assemblies and field days in each elementary and middle school in the unincorporated area each year. County will work with Department of Parks and Recreation to provide space of bicycle repair and host bicycle repair workshops (see City of Burbank Plan regarding bicycle education and repair programs)." In addition, pick a start date and run the program through the duration of the plan.

Change "Consider" to "Create" or "Implement." Pick a start date and run the program through the duration of the plan.

Change "designers" to "all roadway engineers." Also, please elaborate. For example: "County will require all roadway engineers to receive Complete Streets and pedestrian and bicycle safety design training by taking advantage of courses offered yearly by the FHWA, Metro, and work-to-host trainings at DPW every year." Also, pick a start date and run through the duration of the plan.

"Educate all County employees who use a County vehicle on how to safely share the road with bicycles and the rules of the road regarding bicycles before a County employee is able to check out a vehicle. Develop a training module that can be completed from any computer but provides information to the County on who has completed the training; employees who have not completed training will be flagged and unable to check out County vehicles until training has been completed." Pick a date to start program and run through the duration of the plan.

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Change to: "County will implement the Federal Bicycle Tax Benefit Program and create encouragement programs geared at county employees to incentive bicycles as transportation for commuting to work."

Outline how you will work with adjacent municipalities to ensure consistency and regional connectivity. For example: "County will work with Metro and Councils of Government to ensure regional connectivity and consistancy between communitites...."

Community stakeholder group should be made up of at least one representative from each unicorporated community included in the plan. County will work to get participation/representation from each of the unicorporated communities included in this plan so they can help with outreach and build community support for implementation of the network in their area.

County will create a website linked from the County's main homepage - http://dpw.lacounty.gov/- providing information on bicycle safety, how to request bicycle parking in the unincorporated areas, bicycle maps, links to other municipalities bicycle sites, advocacy organizations, information on upcoming community bicycle related meetings (BAC, etc.), events, a digital version of the plan, implementation status of current projects, etc. (Policies 5.2.1 and 5.2.2 should also be included on the website.) Is this something the County is currently working on? (It doesn't appear that the County has a website.) If no, then "Ongoing" is not correct, and the policy should include a start date. In addition, this policy should state the year that it will be completed.

County will secure at least 10% of Measure R Local Return dollars for bicycle and pedestrian improvements and for matching funds for future grants.

Change "Consider using" to "Establish."
"Create a Bicycle Trust Fund as a mitigation measure for development projects based on a nexus to proposed bicycle projects in their project area."

Recommendation

An overarching comment regarding all Education, Enforcement, and Encouragement Programs: Chapter 4 includes many definitions of these types of programs but does not explain what programs the County is going to implement and how it plans to do so. The County should amend Chapter 4 to include details concerning the programs it intends to create and their start and completion dates.

While this program is admirable, LACBC does not consistently offer LAB courses, we can organize them, but there are many other LCIs and groups like Sustainable Streets who offer on-going regular LCI courses. The County should also seek to partner with community based organizations and/or supervisor offices to host these trainings.

Sample program proposal: "The County will develop a template to provide information on best practices on educating and encouragement programs to each school principal in the unincorporated area and work with supervisor offices to celebrate Walk October and annual Bike and Walk to School Day."
Please elaborate. How will the County fulfill this policy? With whom will it partner to do so?
Please elaborate. How will the County fulfill this policy? In what time frame will it accomplish its goals? What parties will be responsible for executing this plan?

Please elaborate. How will the County fulfill this policy? In what time frame will it accomplish its goals? What parties will be responsible for executing this plan?

Please elaborate. What will the County do? Will it work with California Highway Patrol/the Sheriff to ensure officers are trained on rules of the road? How will the County partner with law enforcement to provide better enforcement? How will the County provide better Safe Routes to School enforcement around schools?
Please elaborate. How will the County fulfill this policy? In what time frame will it accomplish its goals? What parties will be responsible for executing this plan?
Please elaborate. Change "Maps can be distributed..." to "Maps will be distributed...." The County should also conduct walk audits with parents and school staff to develop maps.

G-8

Antelope Valley (see maps on pp. 41, 43, and 44):

The Draft Plan offers few bike facilities in the eastern Antelope Valley. The Palmdale / Lancaster area has the potential of becoming a bike commuter friendly area, however, the various bike lanes and trails need to have connecting routes that maintain areas for bicycles to ride. Right now that is not the case. Also, there are many roads, which could be useful bike routes however they lack paved shoulders. We recommend the County improve signage, provide paved shoulders and where possible repave the entire road when installing a bike route. Below are some additional suggestions for improving the Draft Plan in the Antelope Valley:

- Bike Lanes on 30th St West should be of the highest priority, shoulders need to be paved
- Class 2 Bike Lanes are needed on: Division Street, Ave H, Pear Blossom Highway, Barrel Springs Rd, 20th St. West, Ave L to eastern planning area boundary, 10th St West between Auto Center Dr. and Elizabeth Lake Rd., and Sierra Hwy wherever possible
- Pave shoulders to include Class 2 Bike lanes on Rancho Vista Blvd/Ave P and Elizabeth Lake Road between Dianron Rd and 10th St West
- Class 3 Bike Routes should be added to: Angeles Forest Hwy, Godde Hill, Ave O-12, Ave O between Ave 30 West and Sierra Hwy
- Shoulders need to be paved to provide Class 3 Bike Routes on: Escondido Canyon Rd, 30th St East, Ave G East of the 14,
- Include east-west bicycle boulevard route to connect Palmdale and Lancaster to the Sierra Hwy bike trail.
- Connect the Palmdale Ave S bike route to the Sierra Hwy bike trail

East San Gabriel Valley (see maps on pp. 53, 55, and 56):

The Draft Plan currently overlooks some connectivity issues in this project area, leading to gaps in the overall network. Below are some suggestions for improving the Draft Plan for this area:

- Class 2 Bikes Lanes are needed on:
  - Amar Rd from Vineland to Valinda in West La Puente
  - Sunset Ave connecting to proposed 7th Ave bike lanes
  - Fullernton Rd. from Colima to Yes Plaza
  - Gale Ave, west from Fullerton Rd
  - Batson Avenue
  - Paso Real Ave in addition to intersection improvements at Paso Real and Colima Rd, where single greatest number of collisions in planning area took place.
- Safe Routes to School opportunities exist on Vineland Avenue (between Rath Street and Nelson Avenue), Pathfinder Road in Rowland Heights (particularly near Blandford Drive), and Killian Avenue. The Draft Plan should extend the proposed bikeways on Pathfinder to cover the entire road and add bikeways to Vineland and Killian.
- Bike facilities would be appropriate for the Nogales Street, Walnut Drive and Gale Avenue intersection and the Colima Road and Batson Avenue intersection, which get very crowded.

G-8

Gateway Cities (see maps on pp. 65 and 67):
Although the Draft Plan acknowledges the high crash rates in the South Whittier/Sunshine Acres area – typically on arterials that cyclists and truck drivers share, such as Atlantic Boulevard and Mills Avenue near Telegraph Road – it fails to prioritize improvements to those roads appropriately. The Draft Plan should ensure that the County implements them as soon as possible. Below are some additional suggestions for improving the Draft Plan in this area:

- The County should also consider separated bikeways in the South Whittier/Sunshine Acres area.
- Class 2 Bike Lanes are needed on: Victoria Street (from Susana to Santa Fe), Laurel Park Road, Rancho Way, and Susana Way

Metro Area (see maps on pp. 75, 77, and 78):
Due to its central location, bikeways in the Metro area are critical to the greater regional area. Countywide connectivity would be greatly improved by the addition of Class II bike lanes to many arterials in the West Rancho Dominguez-Victoria area. In addition, attention to transit connections, including bikeways proposed in the LACBC's Transit Hub Project, could greatly improve bike-transit connectivity in the Metro area. Below are some additional suggestions for improving the Draft Plan in this area:

- Class 2 Bike Lanes are needed on:
  - Figueroa Street (from 120th Street to 149th Street)
  - Broadway
  - Main Street
  - Rosecrans Avenue
  - Redondo Beach Boulevard
  - 135th Street
  - 157th Street
  - Alondra Boulevard
  - San Pedro Street
  - Van Ness Avenue from Century Boulevard to Imperial Highway in West Athens
  - Whitter Blvd connecting east from proposed bike lanes in City of LA
  - Atlantic Boulevard from Pomona Boulevard to Telegraph Road
  - 3rd Street - County should consider pilot project for left side protected bike lanes from Pomona to Indiana (or consider installing sharrows)
- The Draft Plan should include incorporate the following suggestions from the LACBC Transit Hub Project:
  - Sharrows on Compton Avenue (in the Florence/Firestone area)
  - Bicycle facilities in and around the Imperial-Wilmington Metro Station
  - Bike routes on 68th Street (from Central Avenue to Compton Avenue), Crockett (from 74th Street to 83rd Street), 76th Street (from Whitsett Avenue to Lou Dillon Avenue), and Lou Dillon Avenue (from 76th Street to 79th Street, where a school is located).
- Sharrows should be installed on:
  - Beverly Boulevard from Pomona Blvd to Gerhart Avenue
  - 6th Street

G-8

- Floral Drive
- Whitter Blvd from Downey Road to Atlantic Boulevard

South Bay (see maps on pp. 107 and 109):
Because the South Bay cities are currently creating their regional bike plan, the Draft Plan should provide connections to the proposed facilities included in the South Bay Bicycle Master Plan and other such planning documents from surrounding facilities. In addition, Hawthorne, Gardena, and Lawndale, which contain some of the poorest and most densely-populated census tracts in the region, would greatly benefit from an increase in well-planned bicycle facilities. Priorities for this area must also include the LA River path extension on the Universal side and north of Maywood Avenue, as well as the Confluence Arroyo Seco path extension. Below are some additional suggestions for improving the Draft Plan in the South Bay:

- Class 2 Bike Lanes are needed on:
  - Rosecrans Avenue
  - El Segundo Boulevard
  - Hawthorne Boulevard
  - Manhattan Beach Blvd from Crenshaw to Prairie
  - Normandie Ave in West Carson
  - Sepulveda Blvd in West Carson
  - Prairie Avenue between Redondo Beach Boulevard and 154th Street/Marine Avenue
- Bicycle Boulevards are needed on:
  - 104th and 111th Street in Lennox
- Upgrade the northbound connection between Hermosa Beach and Manhattan Beach on the Strand so that cyclists no longer have to leave the Strand or carry their bikes up the stairs. At least add signs warning cyclists about the stairs severing the path.
- Prioritize the extension of the Class III facility along the Dominguez Channel.
- Draft Plan ignores Crenshaw Boulevard in Alondra Park (a dangerous area with high crash rates) and Lennox (which lacks high-quality east-west connections). The County should consider adding more bike facilities to these areas.
- Sharrows should be installed on:
  - Doty Avenue between Marine Avenue and Manhattan Beach Boulevard
  - Lemoli Avenue, from Marine Avenue to Manhattan Beach Boulevard
- Make southernmost portion of La Cienega Boulevard, which runs parallel to the east side of the I-405 freeway and ends at Rosecrans Avenue, an alternate or supplementary route to the proposed bike route on Inglewood Avenue between El Segundo Boulevard and Rosecrans Avenue.

G-8

Santa Monica Mountains (see map on p. 99):
Many cyclists bike in this area regularly, but the Draft Plan overlooks many of the roads that cyclists commonly use. We recommend incorporating these roads into the Draft Plan:

- Bike Routes with additional Share the Road and Watch for Bicycle Signage:
  - Topanga Canyon Boulevard from Old Topanga Road to Mulholland Drive (or to the County border just before Mulholland)

- Fernwood Pacific Drive
- Tuna Canyon Road, Saddle Peak Road
- Piuma Road
- Schueren Road
- Stunt Road
- Cold Canyon Road
- Dry Canyon Cold Creek ("Seven Minute Hill"),
- Lake Vista in the Malibu Lake area
- Latigo Canyon Road
- Route 23 from Mulholland Drive to Westlake Blvd (back of Decker Canyon)
- Corral Canyon Road (coastal access to Malibu Creek State Park).

- Sharrows are needed on:
  - Cornell Road, Mureau Road, Dry Canyon Cold Creek (Seven Minute Hill section)

<u>West San Gabriel Valley (see maps on pp. 117, 119, and 120):</u>
Pasadena recently completed the update to its bike plan, so the Draft Plan should better incorporate projects in East Pasadena and Altadena that will connect to Pasadena's bike network and close gaps in the countywide network. In addition, some bike paths in the project area have gaps that are connected by bike routes only. Below are some suggestions for improving the Draft Plan for this area:

G-8

- Class II Bike Lanes are needed on:
  - San Gabriel Boulevard (from just south of California to Santa Ynez).
  - Del Mar Blvd (upgrade from Class III, street parking could be removed)
  - Lake Ave (upgrade from Class III, street parking could be removed)
  - New York Dr. (upgrade from Class III street parking could be removed)
- Bicycle Boulevards are needed on:
  - Lotus Avenue
  - Glenrose Avenue
- Sharrows are needed on
  - Duarte Road
  - Madre Street
  - Altadena Drive
  - Allen Avenue and similar existing bike routes should be upgraded to sharrows

<u>Westside/Marina del Rey (see maps on pp. 127 and 129):</u>
Many cyclists prefer taking the straight and mostly well-paved Admiralty Road around the Marina instead of the Marvin Braude Bike Path, which twists through the docks and has some damaged, uneven pavement and two dangerous roadway crossings. The southbound outside lane of Admiralty is wide and comfortable to ride, but the northbound outside lane is narrow and invites conflict. We recommend treatment to improve northbound Admiralty, for its length, from Fiji Way to Via Marina.

Response to Comment G-1

Supporting goal of making Los Angeles County bicycle-friendly but expressing option that the plan does not go far enough

This comment expresses opinions about the scope and scale of the Bicycle Master Plan but does not address environmental issues or the Draft PEIR. In accordance with Section 15132 of the CEQA Guidelines, the Final PEIR need only respond to relevant environmental issues. This comment is outside the scope of the CEQA analysis. However, this comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

Response to Comment G-2

Expressing an opinion that implementation of the Bicycle Master Plan will improve safety for all road users

The comment suggests that the project benefits described in Chapter 2, "Project Description" and Chapter 5, "Project Alternatives," should be changed to include safety benefits from the Plan. In these two locations, the Draft PEIR was quoting the benefits as listed in the Bicycle Master Plan. Therefore, the comment is on the Plan, not the Draft EIR, and is outside the scope of the CEQA analysis. No response is necessary. However, the comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

Response to Comment G-3

Expressing an opinion that traffic impact guidelines are inappropriately applied to bicycle projects

The comment suggests that the transportation impacts section should include "a more refined discussion of the County's thresholds of significance." Further, the comment suggests that bicycle facilities do not add vehicle trips to a roadway. The comment states that the PEIR should address "prospective changes to LOS standards in the future." The comment asks that some alternative LOS standard to be applied, suggesting policies in the Los Angeles County Draft 2035 General Plan Update, which is currently being developed and has not yet been approved by the Los Angeles County Board of Supervisors or undergone environmental analysis pursuant to CEQA. Finally, the comment states that the EIR should discuss the need to change thresholds by which projects are evaluated in Los Angeles County.

The analysis in the Draft PEIR was at a program level. It did not state that the project would add vehicle trips to a roadway. It stated that the program would be expected to reduce vehicle miles traveled (VMT) by encouraging the use of bicycles instead of cars, quantifying the amount of VMT reduction at approximately 155,000 program-wide.

However, CEQA requires the analysis of the whole of the action, which in this case would include removal of some travel lanes and replacing them with bicycle lanes. While such "road diets" do not generate traffic, they may result in displacement of vehicular traffic and lead to localized congestion. This is a potential impact of the projects in the Bicycle Master Plan and must be included in the PEIR as an impact.

CEQA requires that changes that would occur with the project (the impacts) be compared to the baseline condition, which is defined as the conditions that were present at the time of the Notice of Preparation for the EIR. Therefore, comparing impacts to some unspecified future LOS standard would be contrary to the requirements of CEQA and speculative in nature since future LOS standards are unknown.

Instead, CEQA recognizes the validity of using existing standards established to avoid or address environmental impacts as the appropriate measures for analyzing impacts. Arbitrarily using different standards for different projects is inappropriate. The suggested use of policies that are not yet approved and that have themselves not yet been analyzed under CEQA is also inappropriate and is not consistent with CEQA.

The PEIR is not an appropriate forum to discuss the need for changes in public policy, such as suggested by the comment. CEQA is an analysis process, not a policy-making process.

Response to Comment G-4
Requesting program-level review for road diets

The comment asserts that there is insufficient review in the Draft PEIR to reach a conclusion that removing travel lanes would constitute a significant impact. The comment requests that the PEIR propose thresholds under which removing a travel lane would be considered a significant impact.

The level of analysis requested, including looking at additions of left-turn lanes, is beyond the scope of the program-level analysis. Such analysis would require bikeway and roadway design that is not yet available. Mitigation in the program document requires analysis of the impacts of individual projects when design-level information is available, as appropriate under CEQA. The Draft PEIR identified the potential for significant impacts where travel lanes are removed, identified the additional analysis that would be required to determine where these impacts would be significant, and provided mitigation to reduce these impacts to a less-than-significant level.

The threshold for determining whether a bikeway, including those incorporating road diets, would be significant is the same as for any on-road project in Los Angeles County—the County threshold for LOS. As discussed above, CEQA does not allow arbitrary criteria for establishing the threshold for an impact.

Response to Comment G-5
Asserting that traffic mitigation measures would undermine plan implementation

The comment claims that Mitigation Measure MM 2.6-2 (actually Mitigation Measure MM 3.6-2 in the Draft PEIR) would threaten the effectiveness of the entire Bicycle Master Plan, saying that it is inappropriate to remove projects from the master plan as a mitigation measure. Actually, MM 3.6-2 provides multiple remedies to avoid significant LOS impacts of projects that include road diets, with dropping an individual project as the last choice if other mitigation methods would not reduce LOS impacts to less-than-significant levels. The mitigation allows redesigning the project or including other measures in the project to maintain acceptable LOS. Even if an individual project is removed, this would not threaten the effectiveness of the entire Bicycle Master Plan because less than 9% of the total miles proposed in the Plan include road diets. (Note: One of the bullets included in the

MM 3.6-2 in the Draft PEIR has been removed in the Final PEIR because making a statement of overriding considerations is not consistent with the finding that the impacts would be reduced to a less-than-significant level. See Chapter 1 of this Final PEIR.)

Eliminating the ability to remove an individual project if it would result in unacceptable LOS would be contrary to Los Angeles County LOS standards. Also, CEQA requires the incorporation of feasible mitigation into the project, and removing an individual project is feasible mitigation.

Response to Comment G-6
Requesting more sophisticated discussion of parking impacts

The comment requests that Mitigation Measure MM 3.6-3 be made applicable only when the parking removal would affect traffic conditions, and not in all cases, and that it be applicable only to projects with Class III bike routes with sharrows.

MM 3.6-3 is designed to address more than one potential impact from the removal of parking. Parking studies would be required at the project level for all projects that would remove parking, including both Class II and Class III bikeways and bike boulevards. (Applying the mitigation only to Class III may result in significant, unmitigated impacts.) The site-specific parking studies will identify whether the removal of parking would result in significant impacts related to traffic or to adjacent land uses dependent on the parking. If either impact would occur at a significant level, a variety of methods for addressing the impact are available, including limiting the impacts, providing alternative parking, or substituting a Class III bike route for of a Class II bike lane.

Response to Comment G-7
Requesting more elaboration of the No Project Alternative

The comment claims that the statement that some of the projects in the 1975/1976 *Plan of Bikeways* are no longer feasible or do not meet the needs of the biking public needs more support. The statement was provided parenthetically to explain why the No Project Alternative is defined as the County's continued maintenance of the existing bikeway network and that no additional bikeway construction is proposed under the No Project Alternative.

CEQA requires that all EIRs contain a no project or no build alternative but allows the lead agency flexibility in defining exactly what that alternative is. The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. It represents what is reasonably expected to occur in the foreseeable future if the project were not approved.

Because the County has not implemented some recommendations in the 36 years since the *Plan of Bikeways* was approved and does not intend to implement them, the No Project Alternative does not include construction of such projects and they would not be reasonably expected. Further explanation is not required by CEQA.

Response to Comment G-8

Including comments provided on the Draft Bicycle Master Plan prior to the publication of the Draft PEIR

This comment includes requests for changes to the Draft Bicycle Master Plan. This comment is outside the scope of the CEQA analysis. However, this comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

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2.3.8 Commenter H: Southern California Association of Governments (Lieb)

Commenter H

SOUTHERN CALIFORNIA
ASSOCIATION of GOVERNMENTS

Main Office
818 West Seventh Street
12th Floor
Los Angeles, California
90017-3435

t (213) 236-1800
f (213) 236-1825

www.scag.ca.gov

September 21, 2011

Ms. Reyna Soriano
P.O. Box 1460
Alhambra, CA 91802-1460
rsoriano@dpw.lacounty.gov

RE: SCAG Comments on the Draft Program Environmental Impact Report for the County of Los Angeles Bicycle Master Plan [SCAG No. I20110086]

Dear Ms. Soriano:

Thank you for submitting the **Draft Environmental Impact Report for the County of Los Angeles Bicycle Master Plan [SCAG No. I20110086]** to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review). Additionally, pursuant to Public Resources Code Section 21083(d) SCAG reviews Environmental Impacts Reports of projects of regional significance for consistency with regional plans per the California Environmental Quality Act (CEQA) Guidelines, Sections 15125(d) and 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Federal Transportation Improvement Program (FTIP) under California Government Code Section 65080 and 65082. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

SCAG staff has reviewed this project and determined that the proposed project is regionally significant per California Environmental Quality Act Guidelines, Sections 15125 and/or 15206. The proposed Water Management Plan Update includes address change in water supply reliability and in the environment for the planning period of 2010 - 2045. The proposed project is a vision for a diverse regional bicycle system of interconnected bicycle corridors, support facilities and programs to make bicycling more practical and desirable to a broad range of people in the County of Los Angeles. It intends to guide the development and maintenance of a comprehensive bicycle network and set of programs throughout the County's unincorporated communities for the next 20 years.

We have evaluated this project based on the policies of SCAG's Regional Transportation Plan (RTP) and Compass Growth Vision Principles that may be applicable to your project. The RTP and Compass Growth Visioning Principles can be found on the SCAG web site at: http://scag.ca.gov/igr. The attached detailed comments are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. We also encourage the use of the SCAG List of Mitigation Measures extracted from the RTP to aid with demonstrating consistency with regional plans and policies. Please send a copy of the Final Environmental Impact Report (FEIR) ONLY to SCAG's main office in Los Angeles for our review. If you have any questions regarding the attached comments, please contact Pamela Lee at (213) 236-1895. Thank you. H-1

Sincerely,

JACOB LIEB, Manager
Environmental and Assessment Services

5.9.11

September 21, 2011 **SCAG No. I20110086**
Ms. Soriano

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE COUNTY OF LOS ANGELES BICYCLE MASTER PLAN [SCAG NO. I20110086]

PROJECT LOCATION

Los Angeles County is geographically one of the largest in the nation. It stretches along 75 miles of the Pacific Coast of Southern California and is bordered to the east by Orange and San Bernardino Counties, to the north by Kern County and to the west by Ventura County. Los Angeles County also includes offshore islands of Santa Catalina and San Clemente.

The unincorporated areas of the County comprise 2,656.6 miles of the County's 4,083.2 square miles, or 65% of the County's total land area. Majority of the incorporated county land is located in the northern part of the county consisting of 124 separate, noncontiguous land areas. Los Angeles County is heavily urbanized, and most of the undeveloped land that remains is within unincorporated areas.

PROJECT DESCRIPTION

The purpose of the Bicycle Master Plan ("Plan") is to guide the development of infrastructure, policies and programs to improve the bicycling environment in Los Angeles County. The Plan coordinates bicycling planning efforts within the county and with other agencies to expand the existing bikeway network, connect gaps, address constrained areas, provide greater local and regional connectivity, and encourage more residents to bicycle more often. The Plan is a supplementary document to the Los Angeles County General Plan ("General Plan"), providing more detailed bicycle planning and policy direction that is currently adopted in the General Plan. The proposed project also aims to replace the 1975 *Plan of Bikeways* and will also become a sub-element to the Transportation Element of the General Plan and eventually become incorporated into the 2035 Los Angeles County General Plan Update. The Plan is organized by planning area boundaries consistent with the Draft 2035 Los Angeles County General Plan Update. H-2

The proposed project's primary objective is to create a more bicycle-friendly environment in Los Angeles County through the implementation of the Bicycle Master Plan, which would benefit County residents and visitors. As a secondary objective, the County proposes to contribute to resolving several complex and interrelated issues, including traffic congestion, air quality, climate change, public health and livability. By guiding unincorporated areas toward bicycle-friendly development, this Plan can affect all of these issue areas, which collectively can have a profound effort on the existing and future quality of life in the County.

The overall vision established in the Plan involves increasing bicycling throughout the County of Los Angeles through the development and implementation of bicycle-friendly policies, programs and infrastructure. The goals and policies necessary to implement the Plan are listed below:

- **Goal 1 – Bikeway System**: Expanded, improved and interconnected system of County bikeways and bikeway support facilities
- **Goal 2 – Safety**: Increased safety of roadways for all users
- **Goal 3 – Education**: Developed education programs that promote safe bicycling
- **Goal 4 – Encouragement Programs**: County residents that are encouraged to walk or ride a bike for transportation and recreation
- **Goal 5 – Community Support**: Community supported bicycle network
- **Goal 6 – Funding**: Funded Bikeway Plan

Currently, the County maintains approximately 144 miles of existing Class I, II, and III bikeways. The Plan proposes an interconnected network of bicycle corridors adding approximately 695 miles of new bikeways enabling residents to bicycle with greater safety, directness and convenience within and between major regional destinations and activity centers.

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CONSISTENCY WITH REGIONAL TRANSPORTATION PLAN

Regional Growth Forecasts

The Draft Environmental Impact Report (DEIR) should reflect the most recently adopted SCAG forecasts, which are the 2008 RTP (May 2008) Population, Household and Employment forecasts. The forecasts for your region, subregion, and city are as follows:

Adopted SCAG Regionwide Forecasts[1]

	2010	2015	2020	2025	2030	2035
Population	19,418,344	20,465,830	21,468,948	22,395,121	23,255,377	24,057,286
Households	6,086,986	6,474,074	6,840,328	7,156,645	7,449,484	7,710,722
Employment	8,349,453	8,811,406	9,183,029	9,546,773	9,913,376	10,287,125

Adopted Los Angeles County Forecasts[1]

	2010	2015	2020	2025	2030	2035
Population	1,188,321	1,282,624	1,378,396	1,471,608	1,561,983	1,648,694
Households	325,615	357,468	391,383	417,848	443,414	464,468
Employment	320,171	336,371	346,717	358,881	371,868	384,300

1. The 2008 RTP growth forecast at the regional, subregional, and city level was adopted by the Regional Council in May 2008.

H-2

SCAG Staff Comments:

Based on the information provided in the DEIR, SCAG staff cannot determine whether the DEIR population, household and employment analyses were based on the 2008 RTP Regional Growth Forecasts.

The **2008 Regional Transportation Plan (RTP)** also has goals and policies that are pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

Regional Transportation Plan Goals:

RTP G1 *Maximize mobility and accessibility for all people and goods in the region.*
RTP G2 *Ensure travel safety and reliability for all people and goods in the region.*
RTP G3 *Preserve and ensure a sustainable regional transportation system.*
RTP G4 *Maximize the productivity of our transportation system.*
RTP G5 *Protect the environment, improve air quality and promote energy efficiency.*
RTP G6 *Encourage land use and growth patterns that complement our transportation investments.*
RTP G7 *Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.*

H-3

SCAG Staff Comments:

Where applicable, SCAG staff finds that the proposed project partially meets consistency with Regional Transportation Plan Goals. RTP G6 and G7 are not applicable to the proposed project.

SCAG staff finds that the proposed project meets consistency with RTP G1. The proposed project will

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supplement the Mobility Element of the Draft 2035 General Plan Update as a sub-element that will improve and assist in creating an efficient multimodal transportation system that serves the needs of all County residents (Page 3.6-83).

SCAG staff finds that the proposed project meets consistency with RTP G2. Per page, 3.6-94, safety is improved with the creation of Class I bike paths due to the effective separation of bicyclists and pedestrians from motorized circulation. Also the proposed project provides the benefit of fewer vehicular trips which reduces traffic congestion and improves reliability of the overall transportation system (Page 2-3).

Per RTP G3, SCAG staff finds the proposed project consistent. The Bicycle Master Plan intends to guide the development and maintenance of a comprehensive bike network which will introduce maintenance costs but also alleviate other roadway costs due to reduced vehicular trips through road diets (ES-8). H-3

Per RTP G4, the proposed project meets consistency. Per page 3.6-93, the proposed project will implement a Traffic Control Plan to avoid creating additional delay at intersection currently operating at congested conditions.

SCAG staff finds that the proposed project partially meets consistency with RTP G5. Generally, the proposed project makes efforts to protect biological, agricultural, and water resources by implementing mitigation measures to avoid potentially significant impacts (Page 3.2-26). However, the project construction has the potential to negatively impact air quality through the use of onsite construction equipment and emissions (Page 3.7-117).

COMPASS GROWTH VISIONING

The fundamental goal of the **Compass Growth Visioning** effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region's mobility, livability and prosperity. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

Principle 1: Improve mobility for all residents.

GV P1.1 *Encourage transportation investments and land use decisions that are mutually supportive.*
GV P1.2 *Locate new housing near existing jobs and new jobs near existing housing.*
GV P1.3 *Encourage transit-oriented development.*
GV P1.4 *Promote a variety of travel choices* H-4

SCAG Staff Comments:

SCAG staff finds that the proposed project partially meets consistency with Principle 1 where applicable. Principle GV P1.2 is not applicable in that the development is a transportation infrastructure project and does not affect the housing/jobs ratio.

SCAG staff finds the proposed project generally meets consistency with GV P1.1. Per page 2-2, proposed project will replace existing transportation infrastructure and further expand local and regional connectivity within the existing network.

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SCAG staff cannot determine consistency with GV P1.3 based on the information provided in the DEIR.

Per GV P1.4, SCAG staff finds the proposed project is consistent. Per page 3.6-90, the proposed project would encourage the use of bicycles instead of cars; therefore reducing the number of automobile vehicle trips and the total vehicle miles traveled in the County achieved through travelers changing transportation modes. The bicycle network can also be used by pedestrians as well as bicyclists. H-4

Principle 2: Foster livability in all communities.

GV P2.1 *Promote infill development and redevelopment to revitalize existing communities.*
GV P2.2 *Promote developments, which provide a mix of uses.*
GV P2.3 *Promote "people scaled," walkable communities.*
GV P2.4 *Support the preservation of stable, single-family neighborhoods.*

SCAG Staff Comments:

SCAG staff finds that the proposed project partially meets consistency with Principle 2.

SCAG staff cannot determine consistency with GV P2.1 and GV P2.2 based on the information provided in the DEIR.

SCAG staff finds the proposed project meets consistency with GV P2.3. The proposed project promotes walkability and development of bicycle and pedestrian improvements throughout the County (Page 3.6-82). H-5

Per GV P2.4, SCAG staff finds the proposed project consistent. The existing neighborhoods will be preserved as the proposed project aims to improve connectivity of bicycle infrastructure between existing neighborhoods (A-45).

Principle 3: Enable prosperity for all people.

GV P3.1 *Provide, in each community, a variety of housing types to meet the housing needs of all income levels.*
GV P3.2 *Support educational opportunities that promote balanced growth.*
GV P3.3 *Ensure environmental justice regardless of race, ethnicity or income class.*
GV P3.4 *Support local and state fiscal policies that encourage balanced growth*
GV P3.5 *Encourage civic engagement.*

SCAG Staff Comments:

SCAG staff finds that the proposed project partially meets consistency with Principle 3 where applicable. Principles GV P3.1 are not applicable in that the proposed project does not include residential development.

Per GV P3.2, SCAG staff finds the proposed project consistent. The Bicycle Master Plan will include education programs that will contribute to enhancing safety by ensuring bicyclists, pedestrians and motorists understand how to travel safely in the roadway environment (Page 3.6-96). H-6

SCAG staff cannot determine consistency with GV P3.3, GV P3.4 and GV P3.5 based on the information provided in the DEIR.

September 21, 2011 **SCAG No. I20110086**
Ms. Soriano

Principle 4: Promote sustainability for future generations.

GV P4.1	*Preserve rural, agricultural, recreational, and environmentally sensitive areas*
GV P4.2	*Focus development in urban centers and existing cities.*
GV P4.3	*Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*
GV P4.4	*Utilize "green" development techniques*

SCAG Staff Comments:

Where applicable, SCAG staff finds that the project is partially consistent with Principle 4.

SCAG staff cannot determine consistency with GV P4.1 based on the information provided in the DEIR. H-7

Per GV P4.2, SCAG staff finds the proposed project consistent with GV P4.2. The proposed project will expand and further connect urban areas and regional destinations through bicycle infrastructure (A-2).

SCAG staff cannot determine consistency with GV P4.3 and GV P4.4 based on the information provided in the DEIR.

CONCLUSION

Where applicable, the proposed project generally meets consistency with SCAG Regional Transportation Plan Goals and also meets consistency with Compass Growth Visioning Principles.

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA. We recommend that you review the SCAG List of Mitigation Measures for additional guidance, and encourage you to follow them, where applicable to your project. The SCAG List of Mitigation Measures may be found here: H-8
http://www.scag.ca.gov/igr/documents/SCAG_IGRMMRP_2008.pdf

When a project is of statewide, regional, or area wide significance, transportation information generated by a required monitoring or reporting program shall be submitted to SCAG as such information becomes reasonably available, in accordance with CEQA, Public Resource Code Section 21081.7, and CEQA Guidelines Section 15097 (g).

Response to Comment H-1

Encouraging the use of the SCAG List of Mitigation Measures, extracted from the Regional Transportation Plan [RTP], to aid with demonstrating consistency with regional plans and policies

Mitigation measures included in the Draft PEIR are consistent with the applicable mitigation measures in the RTP, including the following:

- Draft PEIR MM 3.1-1 through MM 3.1-3 are consistent with RTP MM-AV.1 through MM-AV.10, as applicable.
- Draft PEIR MM 3.2-1 through MM 3.2-7 are consistent with RTP MM-BIO.1 through MM-BIO.45, as applicable.
- Draft PEIR MM 3.3-1 through MM 3.3-5 are consistent with RTP MM-W.1 through MM-W.36.
- Draft PEIR MM 3.4-1 and MM 3.4-2 are consistent with RTP MM-CUL.1 through MM-CUL.17, as applicable.
- Draft PEIR MM 3.5-1 through MM 3.5-3 are consistent with RTP MM-HM.1 through MM-HM.6.
- Draft PEIR MM 3.6-1 through MM 3.6-3 are consistent with RTP MM-TR.1 through MM-TR.6.
- Draft PEIR MM 3.7-1 through MM 3.7-3 are consistent with RTP MM-AQ.1 through MM-AQ.18, as applicable.

Response to Comment H-2

Stating that SCAG staff could not determine whether the Draft PEIR population, household, and employment analyses were based on the 2008 RTP Regional Growth Forecasts

During the Initial Study for the Bicycle Master Plan, the project was found to have less-than-significant impacts related to population, housing, and employment. The Bicycle Master Plan would have minimal effects on population, housing, and employment. Therefore, the Draft PEIR did not cover these topics.

Response to Comment H-3

Stating that SCAG staff finds the proposed project partially consistent with the RTP Goals

The comment states that the project is only partially consistent with RTP G5 because the project construction has the potential to negatively impact air quality through the use of onsite construction equipment and emissions.

During the Initial Study for the Bicycle Master Plan, it was determined that there was a potential for the project to result in cumulatively considerable net increase of criteria pollutants, including ozone precursors. In the Draft PEIR, the air quality analysis determined that construction-related daily emissions would not exceed the regional significance thresholds for either the South Coast Air

Quality Management District or the Antelope Valley Air Quality Management District (see Tables 3.7-6 and 3.7-7 in the Draft PEIR). The analysis also showed that construction would result in less-than-significant localized impacts using the most conservative estimates of onsite mass emissions (see Tables 3.7-6 and 3.7-7). For the potential to generate greenhouse gas (GHG) emissions, the analysis took a conservative approach in the absence of any County-adopted plans or programs requiring GHG emission reductions and found that the project's limited emissions would represent potentially significant contributions to cumulative GHG emissions. Mitigation measures were included in the Draft PEIR to reduce these impacts to a less-than-significant level.

Note that the long-term air quality and GHG emissions impacts (after construction) would be beneficial to the extent that people would be encouraged to use alternative, non-polluting transportation, as discussed in Section 3.7 of the Draft PEIR, "Air Quality/Greenhouse Gas Emissions."

Response to Comment H-4

Stating that SCAG staff finds the proposed project partially consistent with Compass Growth Visioning [GV] Principle 1, "improve mobility for all residents"

The comment states that the project is consistent with the applicable portions of the GV principles, but that SCAG staff cannot determine consistency with GV P1.3, "encourage transit-oriented development," based on the information provided in the Draft PEIR.

The Bicycle Master Plan is not a transit project or a development project. Nothing in the project either encourages or discourages transit-oriented development. Transit-oriented development is outside the scope of the Bicycle Master Plan but will be addressed in the General Plan Update currently being prepared by the County. The policy is therefore not applicable to the Bicycle Master Plan.

Response to Comment H-5

Stating that SCAG staff finds the proposed project partially consistent with GV Principle 2, "foster livability in all communities"

The comment states SCAG staff cannot determine consistency with GV P2.1, "promote infill development and redevelopment to revitalize existing communities," or with GV P2.2, "promote development that provides a mix of uses," based on the information provided in the Draft PEIR.

The Bicycle Master Plan is not an infill, redevelopment, or mixed-use development project. It neither encourages nor discourages such development. The policy is therefore not applicable to the Bicycle Master Plan.

Response to Comment H-6

Stating that SCAG staff finds the proposed project partially consistent with GV Principle 3, "enable prosperity for all people"

The comment states that, based on the information provided in the Draft PEIR, SCAG staff cannot determine consistency with GV P3.3, "ensure environmental justice regardless of race, ethnicity, or income class"; GV P3.4, "support local and state fiscal policies that encourage balanced growth"; or GV P3.5, "encourage civic engagement."

Regarding environmental justice, the project does not favor or disfavor any race or ethnicity. However, by providing the opportunity for people to use a lower-cost form of transportation, it would have a beneficial effect on low-income populations.

Regarding balanced growth, the project is not a development project. As stated in Chapter 6 of the Draft PEIR, "Growth Inducement," approval of the Bicycle Master Plan would not result in significant inducement of economic or population growth.

Regarding civic engagement, the planning efforts associated with the Bicycle Master Plan, as well as the scoping meetings and public hearing for the PEIR, provided opportunities for the citizens of Los Angeles County to engage in the planning and environmental process.

Response to Comment H-7

Stating that SCAG staff finds the proposed project partially consistent with GV Principle 4, "promote sustainability for future generations"

The comment states that, based on the information provided in the Draft PEIR, SCAG staff cannot determine consistency with GV P4.1, "preserve rural, agricultural, recreational, and environmentally sensitive areas."

During the Initial Study for the Bicycle Master Plan, it was determined that there would be less-than-significant impacts to agriculture because the project would not affect agricultural uses. The Initial Study also determined that impacts to recreation would be either less than significant or beneficial, in that the project would provide additional recreational opportunities.

In Section 3.2 of the Draft PEIR, "Biological Resources," the potential for significant impacts to Los Angeles County Significant Ecological Areas (SEAs), SEA buffers, and coastal Environmentally Sensitive Habitat Areas (ESHAs) was identified. Mitigation was included in the Draft PEIR to reduce these impacts to less than significant.

Response to Comment H-8

Requesting that all feasible measures to mitigate negative regional impacts associated with the project be implemented and monitored, as required by CEQA, and encouraging the use of SCAG's List of Mitigation Measures

The Draft PEIR included mitigation measures to reduce all significant impacts to a less-than-significant level. A Mitigation Monitoring and Reporting Program has been prepared for approval by the Los Angeles County Board of Supervisors prior to certification of the PEIR.

See response to Comment H-1 regarding SCAG's List of Mitigation Measures.

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2.3.9 Commenter I: Jon Nahhas

Commenter I

From: Bike Safety [mailto:venicebikepath@gmail.com]
Sent: Monday, September 12, 2011 8:19 AM
To: Yusuf, Abu
Cc: 'Nancy Marino'; nutritwarehouse@yahoo.com
Subject: RE: Public review meeting for the Draft Los Angeles County Bike Plan EIR

Abu,

Thank you for the notice of this meeting. There are still some outstanding questions that should be answered prior to Thursday's meeting. Would you please review the questions and get back to me as soon as you can (prior to Thursday):

1) What are the minimum widths of roadways allowed by the State/County. (Single lane, 2 & 3 lanes – as is the case on Via Marina in Marina del Rey)? I-1
2) What are the minimum width requirements for a Class 1, Class 2, and Class 3 bicycle lane? I-2
3) What are the narrowest and widest points of Via Marina in MdR? I-3
4) Commissioner Rifkin (Small Craft Harbor Commission) had asked about an analyses on reducing traffic in the Marina to accommodate a safer bike path. Was that analyses ever done? If not, could it be done? I-4
5) I had asked about any studies or analyses concerning tourism (helps with hotel vacancies on County land) in relation to established bicycle paths (as seen in the cities of Boulder, Portland, Long Beach, etc.). I was told that it was not done. Wouldn't this be valuable data? I-5

I do have some other concerns but will leave it there for now. Would you please try to get back to me as soon as you can.

Thanks,

Jon Nahhas

Response to Comment I-1
Requesting information about minimum widths of roadways allowed by the state/County

This comment does not identify any environment impacts but asks a question apparently related to bikeway design. In accordance with Section 15132 of the CEQA Guidelines, the Final PEIR need only respond to relevant environmental issues. This comment is outside the scope of the CEQA analysis. However, this comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

Response to Comment I-2
Requesting information about minimum width requirements of Class I, II, and III bikeways

This comment does not identify any environment impacts but asks a question apparently related to bikeway design. In accordance with Section 15132 of the CEQA Guidelines, the Final PEIR need only respond to relevant environmental issues. This comment is outside the scope of the CEQA analysis. However, this comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

Note that Draft Bicycle Master Plan included standard descriptions for Class I, II, and III bikeways, including widths.

Response to Comment I-3
Requesting information about the widths of the Via Marina in Marina del Rey

This comment does not identify any environment impacts but asks a question apparently related to bikeway design. In accordance with Section 15132 of the CEQA Guidelines, the Final PEIR need only respond to relevant environmental issues. This comment is outside the scope of the CEQA analysis. However, this comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

Response to Comment I-4
Requesting information traffic analysis in the Marina del Rey area to accommodate safer bike paths

As discussed in Section 3.6 of the Draft PEIR, "Traffic and Transportation," site-specific traffic analyses will be conducted for individual projects as part of the project-level CEQA documents, once designs are available to allow this type of analysis. Mitigation Measure MM 3.6-2 requires implementation of recommendations from such studies.

Response to Comment I-5
Requesting studies or analyses concerning tourism, including hotel vacancies

In accordance with the CEQA Guidelines, Section 15064, economic and social changes resulting from a project are not subject to environmental analysis without evidence that they would lead to a change in the physical environment that would lead to significant environmental impacts. The

Bicycle Master Plan would not be expected to result in changes in tourism and/or hotel vacancies that would result in significant physical environmental changes. Therefore, this topic is not within the scope of the PEIR.

This comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

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2.3.10 Commenter J: City of Pico Rivera (Aguilar)

County of Los Angeles Bicycle Master Plan Draft Program EIR

Comment Card

Please use this space to comment on the County of Los Angeles Bicycle Master Plan Draft Program EIR.

J-1

- When will the county provide a response to written comments? (comment submitted via mail from the City of Pico Rivera)

Commenter J

Name: Guille Aguilar *E-mail:* gaguilar@pico-rivera.org

Address: 6615 Passons Blvd., Pico Rivera, CA 90660

RENEW LOS ANGELES COUNTY

Made possible by funding from the Department of Health and Human Services through the Los Angeles County Department of Public Health.

Response to Comment J-1

Requesting information about when the City can expect a response to their written comments

As required by CEQA Guidelines Section 15088(b), the County is required to provide a copy of response to any public agency comments at least 10 days prior to certification of the Final PEIR.

2.3.11 Commenter K: Antelope Valley Air Quality Management District (Banks)

Commenter K

Antelope Valley Air Quality Management District
43301 Division St., Suite 206
Lancaster, CA 93535-4649

661.723.8070
Fax 661.723.3450

Eldon Heaston, Executive Director

October 17, 2011

Mr. Abu Yusuf
County Bicycle Coordinator
900 South Fremont Avenue 11th Floor
Alhambra, CA 91803

Project Description: Bicycle Master Plan (Project No. R2011-00874)

Mr. Yusuf,

The Antelope Valley Air Quality Management District (District) has reviewed the draft EIR document proposing the County of Los Angeles Bicycle Master Plan that would be a component of the Transportation Element of the General Plan, which is a long-range policy document that guides growth and development in the unincorporated portion of Los Angeles County. When the 2035 Los Angeles County General Plan Update is approved, the Bicycle Master Plan will be incorporated as a component of the Mobility Element. The Bicycle Master Plan includes recommendations for an expanded bikeway network in unincorporated communities and along rivers, creeks, and flood control facilities throughout the County.

Based on our review of the draft EIR, the District requests that the County of Los Angeles require the project manager/point-of-contact to submit a Fugitive Dust Emission Control Plan and his/her contact information prior to the start of the project. K-1

Thank you for the opportunity to review this planning document. If you have any questions regarding this letter, please contact me at (661) 723-8070 ext. 2 or Julie McKeehan at ext. 8.

Sincerely,

for / **Bret Banks**
Operations Manager

BB/jm

Bicycle Master Plan.doc

Response to Comment K-1

Requesting submission of Fugitive Dust Emission Control Plan prior to start of project.

As discussed in Section 3.7 of the Draft PEIR, "Air Quality/Greenhouse Gas Emissions," during construction the projects proposed under the Bicycle Masters Plan would comply with each air quality management district's fugitive dust control rules. Therefore, impacts related to fugitive dust would be less than significant. (See Impact 3.7-3, Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under applicable federal or state ambient air quality standards [including releasing emissions which exceed quantitative thresholds for ozone precursors].)

2.3.12 Commenter L: Latham & Watkins LLP, Representing NBCUniversal (Howe)

Commenter L

355 South Grand Avenue
Los Angeles, California 90071-1560
Tel +1.213.485.1234 Fax +1.213.891.8763
www.lw.com

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Milan	

LATHAM&WATKINS LLP

November 10, 2011

VIA FEDERAL EXPRESS AND E-MAIL

County of Los Angeles Department of Public Works
Programs Development Division, 11th Floor
Attention: Ms. Reyna Soriano
P.O. Box 1460
Alhambra, CA 91802-1460

Re: Comments on County of Los Angeles Bicycle Master Plan and Draft Program EIR (Project No. R2011-00874; Advance Planning Case No. 201100008; Plan Amendment Case No. 201100005; Environmental Case No. 201100124)

Dear Ms. Soriano:

We are writing on behalf of NBCUniversal to provide comments on the County of Los Angeles' proposed Bicycle Master Plan and the Draft Program Environmental Impact Report prepared for that Plan.

Universal City is located within the proposed Bicycle Master Plan's San Fernando Valley Planning Area. The Bicycle Master Plan's list of proposed bicycle facilities for the San Fernando Valley Planning Area includes the "Los Angeles River Proposed Bicycle Path," a 1.0-mile Class I – Bicycle Path from Lankershim Boulevard to 0.2 miles west of Barham Boulevard. (Bicycle Master Plan, p. 88 & Figure 3-22.) The Bicycle Master Plan includes this proposed Bicycle Path as part of Phase II of three implementation phases, meaning that it is anticipated to be constructed between 2017 and 2027. (Bicycle Master Plan, p. 11; Appendix I, p I-11.) L-1

The Los Angeles River Proposed Bicycle Path appears to run adjacent to the portion of NBCUniversal's northern property boundary within the unincorporated County of Los Angeles. Approximately three-fourths of the northern edge of NBCUniversal's property is adjacent to River Road, a two-lane roadway running along the Los Angeles River Flood Control Channel, the majority of which is within the jurisdiction of the County. The majority of River Road is owned by the Los Angeles River Flood Control District for the purposes of flood control management and maintenance of the channel. NBCUniversal has had use of the County portions of River Road pursuant to a lease agreement with the County.

The River Road right-of-way is critical to NBCUniversal for providing studio access. The northern portion of NBCUniversal's property is the core area for studio production facilities, including sound stages, outdoor facades and set areas, and independent production facilities. The River Road right-of-way serves as a primary vehicular circulation route, which bypasses critical production areas, thereby minimizing interference with production and the Universal Studios

LATHAM & WATKINS LLP

Hollywood tram tour operations and disruption of access and circulation. In some cases, the River Road right-of-way provides the only means of vehicular access to certain buildings, production areas, and associated parking facilities. In addition to serving as a crucial element of the property's internal circulation system, the River Road right-of-way provides critical emergency vehicle access, particularly to structures located along the Los Angeles River Flood Control Channel.

Given the important function the River Road right-of-way provides for on-site circulation and emergency access, if the County requires that NBCUniversal terminate its use of the River Road right-of-way, NBCUniversal would be required to establish a comparable roadway to serve similar functions within its property for studio and emergency vehicle access. Based on existing uses and site topography, however, a comparable roadway would have to travel through the outdoor production areas or along the northern boundary of NBCUniversal's property. Currently, the low volume of internal circulation traffic that travels through the production areas is halted to allow Universal Studios Backlot Tram Tour passage and permit production activities. Increasing the number of traffic trips through the production areas would reduce the number of productions that could use the area, which would result in an overall decrease in annual studio production. It would also decrease the amount of tram tours that could operate daily and would cause delays in internal circulation. Furthermore, in order to provide a replacement roadway parallel to the existing River Road along the northern boundary of the property, existing occupied production office, studio office, warehouse, and tenant uses and major utility substations would have to be removed. L-1

Given the importance of River Road to studio operations, NBCUniversal would like to work with the County and other agencies as necessary to accommodate the future use of a portion of River Road for a bicycle path as contemplated by the proposed Bicycle Master Plan in a manner that provides for continued use of a portion of River Road for studio access. We note that the Draft Environmental Impact Report for the Bicycle Master Plan is a program environmental impact report and contemplates that a project-level environmental evaluation will be performed for individual projects that are components of the Plan. We respectfully request notice of any planning or subsequent environmental evaluation of the Los Angeles River Proposed Bicycle Path.

We appreciate the County's consideration of these comments. Please do not hesitate to contact me at (213) 891-7540 with any questions or if you would like any additional information.

Very truly yours,

Maria Hoye / cad

Maria Hoye
of LATHAM & WATKINS LLP

cc: Mr. Tom Smith, NBC Universal
Mr. Steve Nissen, NBC Universal

LA\2323076

Response to Comment L-1

Requesting coordination with the County to accommodate proposed bike path while providing continued studio access.

The comment requests future coordination in the design of a project within the Bicycle Master Plan and notification of future environmental evaluations, but it does not address environmental issues in the Draft PEIR. In accordance with Section 15132 of the CEQA Guidelines, the Final PEIR need only respond to relevant environmental issues. This comment is outside the scope of the CEQA analysis. However, this comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

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2.3.13 Commenter M: County of Los Angeles Sheriff's Department Headquarters (Baca/Tse)

Commenter M

County of Los Angeles
Sheriff's Department Headquarters
4700 Ramona Boulevard
Monterey Park, California 91754-2169

Leroy D. Baca, Sheriff

November 1, 2011

John Walker, Assistant Deputy Director
Department of Public Works
Programs Development Division
900 South Fremont Avenue, Fifth Floor
Alhambra, California 91803

Attention: Mr. Abu Yusuf, County Bicycle Coordinator

Dear Mr. Yusuf:

REVIEW COMMENTS
DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT
COUNTY OF LOS ANGELES BICYCLE MASTER PLAN
(PROJECT NO. R2011-00874; LASD/FPB PROJECT NO. 11-053)

The Los Angeles County Sheriff's Department (Department) submits the following review comments on the Draft Program Environmental Impact Report (PEIR), dated August 2011, on the County of Los Angeles Bicycle Master Plan (Project). The proposed Project will replace the *Plan of Bikeways* that was adopted in 1975, and provides guidance regarding the development of infrastructure, policies, and programs for expanding the existing bikeway network, connecting gaps, addressing constrained areas, and providing for greater local and regional connectivity. The Draft PEIR identifies significant impacts that may result from implementing the proposed Project. M-1

The proposed Project, as it is described in the Draft PEIR, is not expected to impact the Department's law enforcement resources or operations. The Department has no other comments to submit at this time, but reserves the right to further address this matter in subsequent reviews of the proposed Project.

Thank you for including the Department in the environmental review process. Should you have any questions regarding this matter, please contact Lester Miyoshi, of my staff, at (626) 300-3012, and refer to Facilities Planning Bureau Project No. 11-053. You may also contact Mr. Miyoshi, via e-mail, at Lhmiyosh@lasd.org.

Sincerely,

LEROY D. BACA, SHERIFF

Gary T. K. Tse, Director
Facilities Planning Bureau

A Tradition of Service Since 1850

Response to Comment M-1

Stating that project is not expected to result in impacts on law enforcement resources or operations.

The comment states that the Bicycle Master Plan is not expected to result in impacts on the County Sheriff's Department law enforcement resources or operations and that the department has no other comments at this time. No response is required.

2.3.14 Commenter N: Multiple Commenters (see letter)

Commenter N

05 November 2011

Mr. Abu Yusuf <ayusuf@dpw.lacounty.gov >
County Bicycle Coordinator
900 South Fremont Avenue, 11th floor
Alhambra, CA 91803

Dear Mr. Yusuf,

Re: --Comments on Proposed County of Los Angeles Master Bicycle Plan;
--Comments on Draft EIR; and
--Request to delete from the Plan the Sepulveda Channel segment from Palms Boulevard to Venice Boulevard in Westside Planning Area

We the undersigned residents and stakeholders have only become aware of the new, proposed Master Bicycle Plan for the County of Los Angeles (the "Plan") in the last week—and only because of a chance posting about it by the Los Angeles Conservancy and Hidden Los Angeles on Facebook within the last two weeks. N-1

We believe inadequate public notice was given about the Plan and the upcoming hearing on November 16th. Having heard nothing about this from the County or the City of Los Angeles, we believe inadequate public outreach was attempted. The small attendance at what meetings have been held previously is evidence alone that the outreach and notification process was insufficient.

The proposed Class I bikeway along the Sepulveda Channel, from Palms Boulevard to Venice Boulevard (the "Bikeway") through our Mar Vista neighborhood should be deleted from the Plan.

- The Bikeway would be just 0.6 of a mile long and unnecessarily duplicates the parallel Class 3 bike route along McLaughlin Avenue, generally just ½ a block to the west.
- Since the 1975 County Bikeway Plan, the County has sold excess right-of-way along that reach of the flood control channel. The right-of-way is no longer consistently wide nor adequately wide enough for a Class I bikeway. N-2
- The Plan doesn't specify or include provisions for sanitation, maintenance, fencing, gating, lighting or noise abatement features that would be necessary for both the safety of bicyclists and pedestrians and the privacy and security of adjoining homes and properties .

This reach of the Sepulveda Channel is and has been an ongoing "attractive nuisance" to our neighborhood since the Channel was built in 1952 and has been used as a quick getaway by thieves and muggers from Venice Boulevard as well as gangs. This was only marginally reduced when the County later fenced it in sometime in the early 1970s—which was only after a young woman had been raped along the Channel near the Charnock Road bridge.

Additionally, the EIR doesn't adequately address the impact that daily public use of the Bikeway would have on the ducks that annually nest along that reach of the Channel. The Channel is on the Pacific Flyway and a necessary resource for wildlife. N-3

Please notify those signing below, individually, of all additional and future hearings and notifications.

Cc:

Mark Ridley-Thomas, Los Angeles County Supervisor, 2nd District
<seconddistrict@bos.lacounty.gov>
866 Kenneth Hahn Hall of Administration
500 W. Temple Street,
Los Angeles, CA 90012

Bill Rosendahl, Councilman, City of Los Angeles, 11th District
<councilman.rosendahl@lacity.org>
200 N Spring Street, #415
Los Angeles, CA 90012

Mar Vista Community Council
<info@marvista.org>
PO Box 66871
Los Angeles, CA 90066

Sincerely,

|signature|
Alexander King
|print name|
3716 Coolidge Avenue
|address|
Los Angeles, CA 90066

avking@live.com
|email address|

|signature|
David Bell
|print name|
3733 Coolidge Avenue
|address|
Los Angeles, CA 90066

dbellmoose@ca.rr.com
|email address|

Nancy Lawrence
|signature|
Nancy Lawrence
|print name|
3642 Coolidge Avenue
|address|
Los Angeles, CA 90066

tearmyartout@mac.com
|email address|

|signature|
Steve Lawrence
|print name|
3642 Coolidge Avenue
|address|
Los Angeles, CA 90066

tearmyartout@mac.com
|email address|

[signature]
Mitzi Takamoto Mitzi Takimoto
[print name]
3612 Coolidge Avenue
[address]
Los Angeles, CA 90066

hhtakamoto@aol.com
[email address]

[signature]
Hideyo Takamoto Hideyo Takimoto
[print name]
3612 Coolidge Avenue
[address]
Los Angeles, CA 90066

hhtakamoto@aol.com
[email address]

[signature]
Dorothy Asbury Dorothy Asbury
[print name]
3606 Coolidge Avenue
[address]
Los Angeles, CA 90066

dorothyasbury@verizon.net
[email address]

[signature]
Diane Karp Diane Karp
[print name]
3727 Coolidge Avenue
[address]
Los Angeles, CA 90066

theman11507@verizon.net
[email address]

[signature]
Lynn Gadal
[print name]
3648 Coolidge Avenue
[address]
Los Angeles, CA 90066

lynngadal@hotmail.com
[email address]

[signature]
Louie Gadal Louis Gadal
[print name]
3648 Coolidge Avenue
[address]
Los Angeles, CA 90066

[email address]

[signature]
MARTIN P. BROD
[print name]
3638 COOLIDGE AVE.
[address]
Los Angeles, CA 90066

[email address]

[signature]
Regina Lewis
[print name]
3622 COOLIDGE AVE
[address]
Los Angeles, CA 90066

[email address]

Page 4 of 13 – 05Nov2011; ltr to A.Yusuf, County Bicycle Coordinator

[signature]
John Betts
[print name]
3661 Coolidge Ave
[address]
Los Angeles, CA 90066
[email address]

[signature]
OMAR SOREK
[print name]
11606 REGENT
[address]
Los Angeles, CA 90066
[email address]

[signature]
ROSALEE SASS
[print name]
11606 REGENT ST
[address]
Los Angeles, CA 90066
[email address]

[signature]
Michaela Wong
[print name]
11601 Francis ~~Place~~ Place
[address]
Los Angeles, CA 90066
[email address]

[signature]
Judith K. Wong
[print name]
11601 Francis Pl
[address]
Los Angeles, CA 90066
[email address]

[signature]
Gi-yeon Buehler
[print name]
3625 Berryman Ave
[address]
Los Angeles, CA 90066
[email address]

[signature]
KAI BUEHLER
[print name]
3625 BERRYMAN AVE
[address]
Los Angeles, CA 90066
[email address]

[signature]
Kathleen Escobedo
[print name]
3631 Berryman Ave
[address]
Los Angeles, CA 90066
[email address]

Lois A. Van Harreveld
[signature]
Lois A. Van Harreveld
[print name]
3637 Berryman Ave
[address]
Los Angeles, CA 90066
[email address]

Mary Ikeda
[signature]
MARY IKEDA
[print name]
3655 BERRYMAN AVE
[address]
Los Angeles, CA 90066
[email address]

Mark Massini
[signature]
MARK MASSINI
[print name]
3637 BERRYMAN
[address]
Los Angeles, CA 90066
[email address]

Cary Smith
[signature]
Carey Smith
[print name]
3673 Berryman Ave
[address]
Los Angeles, CA 90066
careysc@imageworks.com
[email address]

Mitsunori Mano
[signature]
Mitsunori Mano
[print name]
3643 Berryman Ave.
[address]
Los Angeles, CA 90066
[email address]

Edwin Rivera
[signature]
Edwin Rivera
[print name]
3673 Berryman Ave LA CA 90066
[address]
Los Angeles, CA 90066
[email address]

Keiko Ikeda
[signature]
KEIKO IKEDA
[print name]
3655 BERRYMAN AVE
[address]
Los Angeles, CA 90066
[email address]

Ruby Lee
[signature]
RUBY LEE
[print name]
3679 Berryman Ave
[address]
Los Angeles, CA 90066
[email address]

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[signature]
ERIC DAVIS
[print name]
3563 Butler Ave
[address]
Los Angeles, CA 90066
eric66davis@gmail.com
[email address]

[signature]
ALEX B WHITE
[print name]
3539 BUTLER AVE
[address]
Los Angeles, CA 90066
AGSULTAN HOTMAIL.COM
[email address]

[signature]
RACHEL LOPEZ
[print name]
3563 Butler Ave.
[address]
Los Angeles, CA 90066
rachelannelopez@gmail.com
[email address]

[signature]
Allison S White
[print name]
3539 Butler Ave
[address]
Los Angeles, CA 90066
abwhite310@yahoo.com
[email address]

[signature]
Jon Beck
[print name]
3563 BUTLER AVE
[address]
Los Angeles, CA 90066
Jon Michael @ YAHOO
[email address]

[signature]
Diane Green
[print name]
3519 Butler Ave
[address]
Los Angeles, CA 90066
[illegible] legacy.org.
[email address]

[signature]
Kenneth Ng
[print name]
3557 BUTLER AV.
[address]
Los Angeles, CA 90066
caide65@aol.com
[email address]

[signature]
ISABEL ROSENTHAL
[print name]
3515 Butler Ave LA
[address]
Los Angeles, CA 90066
isabel.rosenthal@verizon.net
[email address]

[signature]
GWANG-HUEI LEE
[print name]
3679 Berryman Ave.
[address]
Los Angeles, CA 90066
[email address]

[signature]
Petin Ozuludag
[print name]
11448 Victoria Avenue
[address]
Los Angeles, CA 90066
[email address]

[signature]
Mehmet TUNC
[print name]
11448 Victoria Ave.
[address]
Los Angeles, CA 90066
[email address]

Sharon Stewart
[signature]
[print name]
11530 Victoria Ave.
[address]
Los Angeles, CA 90066
[email address]

[signature]
Premesh Puray.
[print name]
11909 Francis Pl.
[address]
Los Angeles, CA 90066
[email address]

[signature]
DAVIS LEE
[print name]
11459 Charnock Rd.
[address]
Los Angeles, CA 90066
[email address]

[signature]
JANE LIU
[print name]
11459 CHARNOCK RD
[address]
Los Angeles, CA 90066
[email address]

[signature]
Jeffrey Levy
[print name]
3622 Coolidge Ave.
[address]
Los Angeles, CA 90066
[email address]
Ralph Levy
3622 Coolidge AVE

[signature]
Gerlinde Friedrich
[print name]
3553 Butler Ave
[address]
Los Angeles, CA 90066
fradinda@aol.com
[email address]

[signature]
[print name]
[address]
Los Angeles, CA 90066
[email address]

[signature]
GLORIA FERRUFINO
[print name]
3535 Butler Ave
[address]
Los Angeles, CA 90066
[email address]

[signature]
[print name] 3535 Butler Av.
[address]
Los Angeles, CA 90066
[email address]

[signature]
Grace Millington
[print name]
11353 Regent St
[address]
Los Angeles, CA 90066
[email address]

[signature] 3526 Butler Ave
[print name] ROLLA WAGNER
[address]
Los Angeles, CA 90066
[email address]

[signature]
Mary Anne Miller
[print name]
3508 Butler Ave
[address]
Los Angeles, CA 90066
[email address]

[signature] 3526 Butler
[print name] Leland B. Wagner
[address]
Los Angeles, CA 90066
[email address]

Annette Kakehashi
[signature]
Annette Kakehashi
[print name]
3632 Coolidge Ave
[address]
Los Angeles, CA 90066
[email address]

[signature]
Grant Kakehashi
[print name]
3632 Coolidge Ave.
[address]
Los Angeles, CA 90066
[email address]

[signature]
BRYAN KAKEHASHI
[print name]
3632 COOLIDGE AVE
[address]
Los Angeles, CA 90066
[email address]

[signature]
Steven Kakehashi
[print name]
3632 Coolidge Ave.
[address]
Los Angeles, CA 90066
[email address]

Gary Mayer
[signature]
GARY Mayer
[print name]
3654 Coolidge Ave
[address]
Los Angeles, CA 90066
[email address]

Helen Mayer
[signature]
Helen Mayer
[print name]
3654 Coolidge Ave.
[address]
Los Angeles, CA 90066
[email address]

[signature]
Ellie & Mark Hrymoc
[print name]
3658 Coolidge Ave
[address]
Los Angeles, CA 90066
hrymoc@gmail.com
[email address]

[signature]
Christina Weisner
[print name]
3707 Coolidge Ave
[address]
Los Angeles, CA 90066
[email address]

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[signature]
HANS G-BRAUER
[print name]
3530 BUTLER AVE.
[address] L.A Ca 90066
[email address]

[signature]
Alma Ferrufino
[print name]
3535 Butler Avenue
[address] Los Angeles, Ca. 90066
[email address]

[signature]
ERIKA BRAUER
[print name]
3530 Butler Ave.
[address]
[email address]

[signature]
KELLI SOWLES
[print name]
3543 BUTLER AVE
[address] Los Angeles Ca 90066
[email address]

[signature]
DANIEL SAZHARNY
[print name]
3543 BUTLER AVE.
[address] Los Angeles, Ca 90066
[email address]

[signature]
Jerry Ferrufino
[print name]
3535 Butler AVE
[address] Los Angeles, Ca 90066
[email address]

[signature]
Peter Friedrich
[print name]
3553 Butler Ave.
[address]
[email address]

[signature]
Kimberly James
[print name]
11526 Victoria Ave
[address] LA CA 90066
[email address]
Kjames3353@gmail.com

[signature]
[print name]
3717 Coolidge
[address]
Los Angeles, CA 90066
[email address]

[signature]
[print name]
3710 McLaughlin Ave
[address]
Los Angeles, CA 90066
[email address]

[signature]
DAN Garcia
[print name]
3736 McLaughlin
[address]
Los Angeles, CA 90066
[email address]

[signature]
Michael Alan Oppenheim
[print name]
3706 Coolidge Ave
[address]
Los Angeles, CA 90066
[email address]

[signature]
Linda Subias
[print name]
3746 McLaughlin Ave
[address]
Los Angeles, CA 90066
[email address]

[signature]
Stephanie Wexler
[print name]
11497 Bionz DR.
[address]
Los Angeles, CA 90066
[email address]

[signature]
MARK HARRIS
[print name]
11491 BIONA Dr.
[address]
Los Angeles, CA 90066
[email address]

[signature]
[print name]
[address]
Los Angeles, CA 90066
[email address]

[signature]
Cathy Engel-Marder
[print name]
3497 Butler Ave.
[address]
Los Angeles, CA 90066
culturelink1@yahoo.com
[email address]

[signature]
[print name]
[address]
Los Angeles, CA 90066
[email address]

[signature]
MICHAEL ANDERSON
[print name]
3491 BUTLER AVE
[address]
Los Angeles, CA 90066
M_ANDERSON55@YAHOO.COM
[email address]

[signature]
[print name]
[address]
Los Angeles, CA 90066
[email address]

[signature]
Anne McDowell
[print name]
3527 Butler Ave
[address]
Los Angeles, CA 90066
abmcdowell@hotmail.com
[email address]

[signature]
[print name]
[address]
Los Angeles, CA 90066
[email address]

[signature]
Mark Beam
[print name]
3529 Butler Avenue
[address]
Los Angeles, CA 90066
[email address]

[signature]
[print name]
[address]
Los Angeles, CA 90066
[email address]

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[signature]

JERRY SMITH

[print name]

11511 MARCO PL

[address]

Los Angeles, CA 90066

JSMITHRE@MSN.COM

[email address]

THIS IS MY FIRST NOTIFICATION OF THE PURPOSED BIKE PATH. THIEVES HAVE USED THE FLOOD CHANNEL 2 TIMES TO BREAK INTO MY HOME.

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[print name]

[address]

Los Angeles, CA 90066

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Los Angeles, CA 90066

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Los Angeles, CA 90066

[email address]

Response to Comment N-1
Stating belief that the public was not provided adequate notice

The comment states the belief that the public did not receive adequate notice from the County and City of Los Angeles of the November 16th Regional Planning Commission meeting and other meetings. The County has used its standard notification process for all meetings related to the Bicycle Master Plan and the PEIR. As it relates to the CEQA process, the notification was consistent with the requirements of CEQA, including publication in at least one newspaper of general circulation and posting in the office of the county clerk. (Note: The City of Los Angeles is not involved in the PEIR, except as a responsible agency, and has no notification responsibilities for this process.) For more information of the public notification process of the PEIR, see Appendix A of the Draft PEIR, "Notice of Preparation and Initial Study"; Appendix B of the Draft PEIR, "Scoping Report"; Section 1.1.3 of this Final PEIR, "Process"; and Appendix A of this Final PEIR, "Record of Public Hearing."

Response to Comment N-2
Requesting changes to bikeways in the Bicycle Master Plan

This comment requests changes in the project description (the Bicycle Master Plan), specifically removal of a Class I bike path along the Sepulveda Channel between Palms Boulevard and Venice Boulevard. The reasons provided relate to the need for the facility, the adequacy of the right-of-way available, and lack of project-level design information. The comment does not address environmental impacts of the Draft PEIR. In accordance with Section 15132 of the CEQA Guidelines, the Final PEIR need only respond to relevant environmental issues. This comment is outside the scope of the CEQA analysis.

Response to Comment N-3
Stating that the Draft PEIR did not adequately address impacts to wildlife

This comment states that the Draft PEIR did not adequately address impacts from daily public use of a Class I bike path along Sepulveda Channel between Palms Boulevard and Venice Boulevard on nesting ducks along the channel. The Draft PEIR addressed biological issues in Section 3.2, "Biological Resources," and included mitigation for such resources, including MM 3.2-3, "Avoid impacts on nesting birds and raptors." At the project level, additional analysis will be required for Bicycle Master Plan projects located along drainage courses, riparian habitats, and other sensitive habitat, and mitigation necessary to avoid significant impacts will be developed and incorporated into these projects, as discussed in the Draft PEIR. It should be noted that bikeway facilities are located along similar channels throughout southern California without significant impacts to the urban-adapted birds commonly nesting in such areas.

Appendix A | Record of Public Hearing

PUBLIC HEARING

FOR THE

COUNTY OF LOS ANGELES BICYCLE MASTER PLAN

DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

320 WEST TEMPLE STREET

LOS ANGELES, CA 90012

THURSDAY, SEPTEMBER 15, 2011

7:00 P.M.

REPORTED BY:
MARCELLA A. SYLVESTER
CSR NO. 12720

PARK AVENUE DEPOSITION SERVICE
740 NORTH GAREY AVENUE
POMONA, CA 91767
(800) 447-3376

I N D E X

LOS ANGELES, CALIFORNIA, THURSDAY, SEPTEMBER 15, 2011, 7:00 P.M.

-oOo-

(Court Reporter services were made available to the public during this meeting.)

MR. MILEWSKI: Hello. Thank you for coming. My name is Steve Milewski. I work for the County of Los Angeles, the Department of Public Works. This is our public hearing for the EIR for the Draft Master Plan, the County of Los Angeles. We are in the process of updating the Master Plan for the entire county, and the Bicycle Master Plan is one of those elements, and Public Works is working along with Regional Planning and Public Health to do that.

We have members of the committee present tonight. We have Mr. Alan Abramson, who is the head of the section doing the master plan. We have Danny Rosenfeld in the back from Public Health, and over here we have Rachel Siemers --

MS. SEIMERS: Gretchen.

MR. MILEWSKI: -- Gretchen Siemers from Regional Planning. So, the plan is going to be adding roughly 700 miles to the existing routes. And the plan itself is pretty close to being final, right, Alan? It's going through the public review process. So, this meeting tonight is to discuss the environmental impacts of the

plan -- not the plan itself -- is what will be discussed tonight.

So, the County has hired ICF International to come up with the Environmental Impact Report for us. Donna McCormick is going to speak about that. So, Donna, if you would.

MS. MC CORMICK: Okay. So, the Environmental Impact Report is following the CEQA process. CEQA is the California Environmental Quality Act, and this is required to inform the decision-makers -- in this case, the Planning Commission, and ultimately the supervisors -- before they actually adopt the plan, so that they understand what the impacts of the plan are. The other purpose of CEQA is to inform the public, let them know what the impacts are, and the purpose of the plan.

This is a Program EIR. And a program document is done to allow the environmental impacts to be considered at the very beginning of the process before they get into doing a lot of design, and to have -- because they are going to adopt a plan in concept, basically, that covers a very large area, and these will be implemented over several years.

A program document is appropriate to look at the impacts of the entire plan, and try to anticipate what potential impacts could occur with each of the individual

projects.

So, this is the Program EIR process. We started with the notice of preparation and initial study, which allows us to focus the document on where there would likely be impacts. During that process, we had a scoping meeting where we asked the public, and the other agencies that would be involved, what they would like to see in the environmental document. And we took those comments, and we drafted the draft EIR, and did the analysis.

Now, we are at the point where we are taking public comments on the Draft EIR. The Draft EIR sounds like a half-done story, but it's really where the bulk of the analysis is done. So, we do the Draft EIR, and we put it out to the public, and they give comments on it.

And then, after we receive their comments, we provide responses to all those comments and additional analysis goes into the Final EIR. The Final EIR then goes to the decision-makers, and they -- to inform them.

They -- assuming that they are happy with the efforts that have gone on, they do something called certifying the document. It says that they certify it, that it represents the impacts accurately, and then they can either approve or deny the original project, that is, the EIR. They may make changes, and that sort of thing. But in the process, they have to do the certification of

the environmental document before they do the final.

So, let me just tell you a little bit about what's in the EIR -- the Draft EIR. Not every single topic is appropriate to be talked about when we are talking about the Master Bicycle Plan. Certain topics just aren't pertinent to it, and especially in some areas in the Draft EIR. It's just to the resources that would be affected. Through that initial screening process, that I mentioned, the notice of preparation setting and in scoping, we identified these areas for future analysis in the Draft EIR. I will just go through with you each one of these topics real quick.

So, the first one is esthetics and visual resources. And the potential impacts that we have identified were potential impacts to scenic highways. So, a few of the bicycle facilities are on scenic highways that overlook and might impact the regional trail system. There's a couple of major trails out there where they would either interface with these trails, or be visible from them.

So, we looked at those impacts, and there was mitigation that basically is called for as the project is implemented that would avoid view obstruction, obstruction either of the scenic bay or regional trails, and to design the bicycle facilities that are in the Master Plan to be

compatible with these types of resources.

The next topic is biological resources. And biological resources looked at potential impacts to significant ecological areas in L.A. County, likely ecological impacts to drainage, riparian habitats, native trees and sensitive species from the bicycle facility master plan and along existing roadways. There are other areas that take advantage of easements along waterways and rivers, and that sort of thing. That's where we would most likely have impacts.

So, the mitigation program, again, would be implemented through the individual projects. It would include compliance with the permits, requirements of the various resource agencies, doing some habitat protections where necessary, timing of construction to avoid impacts such as nesting seasons, monitoring to make sure that any construction is not going to cause impacts, and protect the resources, and other forms of protection, like runoff and dust control, and that sort of thing -- and then tree replacement, if any trees are affected by the building of trails or bike paths, for the most part.

The next topic is hydrology and water quality, which is related to biological resources very closely. It tends to be located in the same -- hydrology and water quality are -- tend to be biological resources. So, some

type of diversion, sometimes to build a -- if we were bridging over water facilities that alter drainage, an increase in impervious surfaces, which is like paving material down in areas that currently don't have any paving, it reduces the area available for groundwater to percolate down through the soil.

And then another issue is trash from bicycle users, or bikeway users -- it's not just bicyclists that would put the trash there, necessarily -- but this can end up in water resources.

So, the mitigation is avoidance, try to avoid, for the most part, the bike -- the waterways. Maintaining flood plain size, that's something that is done by -- the Bicycle Master Plan would reduce the size of the flood plain, prevent erosion during various construction projects, and design and construct appropriate drainage, and trash management.

Then the cultural resources, archaeologic and historic resources. And the potential impacts to archaeologic resources would refer to disturbances of the ground, anytime there's any grading going on. And then for historic resources, the impacts tend to be historic buildings and other types of structures. That happens mostly where any widening would be required, since this tends to be at locations of existing roadways. If there's

widening, there are potential impacts to cultural resources.

The mitigation is avoidance, for the most part. It's not the intention of this plan to destroy any archaeologic resources, and those would be avoided, and, if necessary, treatment plans, which are processes to identify the resources and treat them appropriately. Sometimes it's capping, which is a very common treatment plan for a buried resource. They just cap it, so it won't be disturbed again.

Another topic that was discussed in the environmental document is hazards and hazardous materials, and the potential impact that we have found was exposure to toxic groundwater and existing toxic groundwater resources. Obviously, in very urban areas there are toxins in the groundwater. And to any other hazardous materials often found in any demolition for widening of roadways, you might have hazardous materials such as asbestos, lead-based paint, and that sort of thing within the structure.

So, the mitigation is taking the appropriate action in accordance with Preliminary Environmental Site Screening, or PESS, and the followup study that would be done at the project level once these projects make their way through the process towards construction. And at that point, there are fairly formulated methods to identify the

impacts to potential hazardous materials, and mitigating those either during the project itself, or doing it over several years on the project, or the people that created the hazardous condition being required to mitigate it.

There are several traffic and transportation impact potentials for the project. There is construction impacts during the bicycle lane construction, for instance, or anytime that there's a lane reduction because of construction. In other words, you are putting cones into the construction area and reducing the amount of space for traffic during that time. That's a construction impact. And then the secondary impacts were identified. The removal of -- the actual removal of parking under CEQA is not considered an impact. So, it's not an environmental impact, but it can lead to secondary impacts.

So, for instance, if you reduce the amount of parking available, people spend more time, burning more fuel, creating more pollution, looking for parking someplace else. So, that can also have impacts on land use. If you take away parking necessary for businesses to operate, it would lead to that business not being able to operate, and it could lead to environmental deterioration of the neighborhood. It's called a secondary impact.

The mitigation is, during the construction, the County has a traffic control plan process where traffic is

controlled, to avoid the congestion and to treat it appropriately, making sure there is appropriate signage, signaling, and that sort of site-specific traffic and parking study recommendations. So, if there are parking impacts to be relieved, a study will be done to determine what the impact of that parking removal would be, and how that parking can be replaced, or some other measures can be taken to avoid the secondary impacts.

Finally, the air quality and greenhouse -- well, the second to the final. Air quality and greenhouse gas emissions were discussed. There was no conflict identified with any of the existing air quality plan standards. You can plan -- the bicycle facilities don't typically cause air quality problems. In fact, they have the potential to reduce air quality impacts. So, we don't find any impacts related to that.

But in an abundance of caution, as all environmental documents do these days, we do look at the potential increase of greenhouse emissions. This is just generally related to construction. So, when you do have construction equipment working, it does have some impact, and that construction is, obviously, to global greenhouse gas emission, which is a global issue. So, any construction here, or on the other side of the world is going into the same global environment. So, what we do is

we identify that there's some contribution of greenhouse gases during the construction period, and we call for some measures to reduce that and offset it.

So, we look at energy-efficient construction equipment, and methods that are pretty much becoming standard in most construction projects now to offset greenhouse gas emissions.

Again, the project itself, the operation of the bicycle facility is not likely to result in any contribution of greenhouse gases, and, in fact, would offset impact, the more people you put on bicycles and out of cars.

And, finally, in general, just in an abundance of caution of mineral resource identified, that there's a potential in rural areas of the county, there is existing mining. And that involves existing transportation of the mineral resources in big trucks, which is sometimes not compatible with bicycles, and vice versa.

We basically identified that there would be a potential for impact, and at the design stage when each of the projects get implemented, if there are such conflicts that exist within that area, they would look at ways to protect the access to the mineral resources while including the bicycle lane. So, separation of the truck-and-bicycle traffic, and that sort of thing, would be looked at, again,

at the project level.

So, these are the issues that were identified in the environmental document, all assuming that the mitigations can be implemented as called for in the document. We found that there would be no significant environmental impact and mitigation for any of these resources, that all of the impacts could be reduced to less than significant.

So, we are going through the process again. We are here, as you can see, at the public comment phase. And this is your opportunity to provide comments. And then, at that point in the winter -- sometime during winter, late this year and early next year, the Regional Planning Commission will hold its public hearing on the plan and the environmental document. And in March of 2012, the Plan -- the Board of Supervisors will certify and adopt the Master Plan, if that's what they desire to do.

So, that's the upcoming schedule, and we want to encourage you to provide comments. There's a number of ways you do that. You can tell us now. You can fill out a public speaker card. We will take your card, and we will record your comments. All comments that we receive will be in the final document. It's a requirement of CEQA that we respond to all comments. So, you can -- or if you don't want to speak tonight, you can leave a card. We have

comment cards here.

We also provided a flyer. And on the back of that flyer, there's also another opportunity to provide comments. You can mail that in, or you can E-mail, or write your comments in any other form. But the important thing is these have to be in by September 23rd. That is the last day. We are required to have a 45-day comment period, and that's the 45th day. So, if you could get your comments in between now and September 23rd, we will be including those in the final document and a response to each comment.

So, that comes to -- that's the conclusion of my presentation. We would like you to now, if you'd like, to come forward and provide your comment card so we will have your name. And you can sit down at one of the tables right here where the microphone is, and go ahead and provide your comments. Because of the overwhelming number of people, we want to limit your comments to about five minutes, but we will give you a little leeway since this isn't a terribly big crowd.

So, would anybody like to provide comments? No?

UNIDENTIFIED FEMALE SPEAKER,

UNIDENTIFIED FEMALE SPEAKER: Well, can you explain this secondary impact about the removable parking?

MS. MC CORMICK: Yeah. That is if parking has to be removed, in other words, to provide a bicycle lane in some locations, they may ask you to use what is now being used as parking to provide a bicycle lane. That's a potential impact of the project. If they do that, at that stage where they are ready to start implementing that, they have to do a study to look at what the secondary impacts are of that parking.

So, if -- let's say it's on-street parking for several little shops, or a restaurant, or something like that, does that then make that restaurant not able to stay open, or would there be -- and that's called a secondary land use impact because that land could change the use because they can't -- they don't have sufficient parking for their business.

If the -- the study could also find that because it's an area with a limited amount of parking and a lot of traffic, the people could actually be checking block by block, and that's the cause of secondary impacts for the air quality and traffic impacts. So, those are typical secondary impacts.

The study that would be done -- that's at the project level versus the program level -- but at the project level, it would identify if any of those impacts occur, and come up with solutions. In some cases, it may

be, you know, don't take the parking, and instead maybe use a bicycle route which merges the traffic, which doesn't have a separate lane for the bicycles. It could be that additional parking could be found in another location nearby. That could be determined at the design stage -- what they call the design stage -- when they have to determine exactly how much space they need, and how much parking would be removed.

MR. MILEWSKI: The bicycle master plan is roughly 700 miles of new routes, but it's not 700 miles of parking removal. There's only going to be a few isolated incidences that would call for removal, just to clarify.

GUILLE AGUILAR,

MS. AGUILAR: I have a question, not actually a comment.

MS. MC CORMICK: Can you come forward then, and -- we want to make sure that your comments are reflected in the EIR. You know, we will be glad to answer your question, but if there are things that we need to address in the Final EIR -- and did you fill out a card?

MS. AGUILAR: I can fill it out.

MS. MC CORMICK: That would be great. That way our court reporter --

MS. AGUILAR: I am with the City of Pico Rivera. We

E-mailed in comments, so I just wanted to know how soon do we expect a response, or will we have to wait until the document is prepared and request a copy of it?

MS. MC CORMICK: What CEQA requires is that we respond to that in the Final EIR. But because you are with another agency, we are required to provide that to you at least ten days before the final decision is made. You will get that before then.

MS. AGUILAR: Okay.

MS. MC CORMICK: We will make sure that you get that -- that you are provided with that comment.

MS. AGUILAR: Do you have a timeframe for when the final --

MS. MC CORMICK: We should be able to provide that to you, the responsive time, to the City during -- about the same time as the Planning Commission is going to be here. So, we are looking at, say, the end of this year, the first of next year.

MS. AGUILAR: Okay.

MS. MC CORMICK: I don't anticipate it being much longer.

MS. AGUILAR: Okay. Thank you.

MS. MC CORMICK: Thank you. And if you could just leave your card with --

MS. AGUILAR: With you, or with them, or --

MS. MC CORMICK: You can just leave it with them, actually.

MS. AGUILAR: Okay.

MS. MC CORMICK: Any other comments? Well, we want to thank you for attending, and we have some contact information. It's the same that's on the flyer. For the EIR -- if you have comments on the EIR, again, by the 23rd. And the contact person is Reyna Soriano, who is right there in the front row, and her contact information is there.

For the bicycle plan, you can contact -- that's the actual plan itself, as opposed to the environmental document -- Abu Yousef. And his contact information is there, and you can contact him that way. That's the end of our presentation.

(The public hearing was concluded at 7:36 p.m.)

REPORTER'S CERTIFICATE

I, Marcella A. Sylvester, a Certified Shorthand Reporter within and for the State of California, do hereby certify:

That the said public meeting was taken down by me in shorthand at the time and place herein stated and was thereafter reduced to print by Computer-Aided Transcription under my direction;

I further certify that I am not of counsel or attorney for any of the parties hereto or in any way interested in the event of this cause, and that I am not related to any of the parties thereto.

In witness whereof, I have subscribed my name this 29th Day of September, 2011.

Marcella A. Sylvester

Marcella A. Sylvester, CSR No. 12720

Appendix B | Correspondence with Public Agencies

December 16, 2011

Julia Gonzales, Interim Director
City of Pico Rivera
Community and Economic Development Department
6615 Passons Boulevard
Pico Rivera, CA 90660

Subject: County of Los Angeles Bicycle Master Plan
Final Program Environmental Impact Report (PEIR)
Response to Comments

Dear Ms. Gonzales:

Thank you for your recent comments on the County of Los Angeles Bicycle Master Plan Draft Program Environmental Impact Report (PEIR) (your letter dated September 12, 2011). On behalf of the County of Los Angeles Department of Public Works, ICF is providing your agency with written proposed responses to your comments at least 10 days prior to certification of the PEIR (CEQA Guidelines §15088(b)). Please find attached your comment letter and the proposed responses.

The Regional Planning Commission for the County of Los Angeles is scheduled to take action on the adoption of the Bicycle Master Plan, including a recommendation on the certification of the PEIR, at its regular meeting on January 12, 2012. The Bicycle Master Plan approval and EIR certification will then be considered by the County of Los Angeles Board of Supervisors in March 2012.

Thank you for your interest in the County of Los Angeles Bicycle Master Plan PEIR.

Sincerely,

Donna McCormick, AICP
Project Manager

Attachment
City of Pico Rivera, Community and Economic Development Department Comment Letter and Response to Comments

cc: Reyna Soriano, County of Los Angeles Department of Public Works

1 Ada Parkway, Suite 100 — Irvine, CA 92618 — 949.333.6600 — 949.333.6601 fax — icfi.com

Commenter A

Julia Gonzalez
Interim Director

City of Pico Rivera
COMMUNITY AND ECONOMIC DEVELOPMENT DEPARTMENT
6615 Passons Boulevard · Pico Rivera, California 90660
(562) 801-4332 Fax (562) 949-0280
Web: www.pico-rivera.org · e-mail: avillanueva@pico-rivera.org

September 12, 2011

County of Los Angeles Department of Public Works
Programs Development Division, 11th Floor
Attention: Ms. Reyna Soriano
P.O. Box 1460
Alhambra, CA 91802-1460

SUBJECT: PUBLIC COMMENT SUBMITTAL - DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR) FOR THE COUNTY OF LOS ANGELES BICYCLE MASTER PLAN

Dear Ms. Soriano:

On behalf of the City Council and City Manager of the City of Pico Rivera, we would like to submit a formal comment for the County of Los Angeles Bicycle Master Plan – Draft Program Environmental Impact Report. Our formal comment is as follows:

Section 2.6.2 of the PEIR states, "[t]he Plan proposes an expanded bikeway network in unincorporated communities and along rivers, creeks, and flood control facilities within County jurisdiction". Section 2.3 of the PEIR states that the purpose of the Plan is to provide, "direction for expanding the existing bikeway network, connecting gaps, addressing constrained areas, providing for greater local and regional connectivity, and encouraging more residents to bicycle more often". A-1

After reviewing the draft Plan and PEIR, the City believes that an optimal connectivity opportunity was not included or analyzed. This opportunity is the construction of a bicycle path (bridge) over the San Gabriel River connecting the Mines Avenue bicycle route in Pico Rivera to the Dunlap Crossing bicycle route in an unincorporated community near the City of Whittier (see attached map and aerial photograph). The land involved in this proposed bicycle path is within the boundaries of the City of Pico Rivera but, because it is a river and flood control facility, it is under the jurisdiction of the County.

Bridging this gap will provide a more urban connection between the Rio Hondo Bike Path and the San Gabriel River Bikeway; the nearest bikeway connection between these two rivers is several miles north along the Whittier Narrows Recreation Area. The suggested bridge will also result in the connection of the County's major bike systems by linking the Los Angeles River Park Bike Path to the Rio Hondo River Bicycle Path and then to the San Gabriel River Bikeway. This will result in easier access for bicyclists, greater regional connectivity within the bike system and encourage the use of these facilities. A-1

Note that we had previously submitted this comment orally at the public workshop held in the Baldwin Park Library on March 29, 2011. At that time, several members of the audience agreed with and supported the City's comment.

Please keep us apprised of the status of this comment. Any questions or concerns regarding this comment should be directed to Ms. Guille Aguilar, Senior Planner. She can be reached via email at gaguilar@pico-rivera.org or at (562) 801-4332.

We look forward to working with the County on the update of the Bicycle Master Plan.

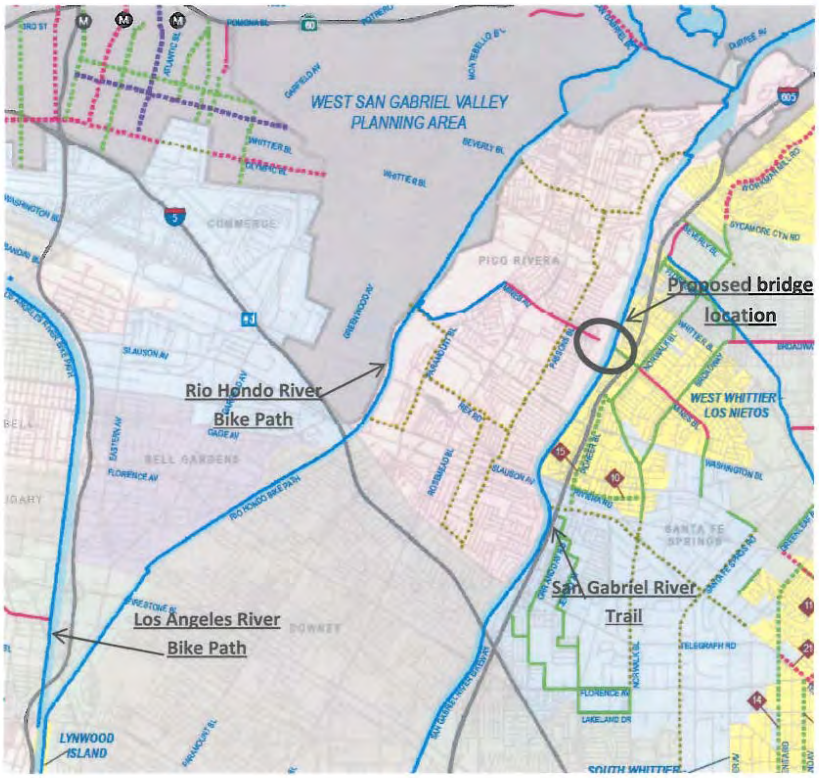
Respectfully,

Julia Gonzalez
Interim Director of Community and Economic Development

CC: Ronald Bates, City Manager
Attachment: Map and aerial photograph

JG: GA

Map:


WEST SAN GABRIEL VALLEY
PLANNING AREA
Proposed bridge
location
Rio Hondo River
Bike Path
WEST WHITTIER
LOS NIETOS
San Gabriel River
Trail
Los Angeles River
Bike Path
LYNWOOD
ISLAND

Aerial Photograph:

Response to Comment A-1

Requesting additional bikeway be added to the Bicycle Master Plan

This comment requests a change in the project description (the Bicycle Master Plan), but it does not identify any environment impacts that would be avoided by inclusion of this bikeway. In accordance with Section 15132 of the CEQA Guidelines, the Final PEIR need only respond to relevant enxvironmental issues. This comment is outside the scope of the CEQA analysis. However, this comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

December 16, 2011

Dianne Walter, Planning Manager
City of Glendora
116 East Foothill Boulevard
Glendora, CA 91741

Subject: County of Los Angeles Bicycle Master Plan
Final Program Environmental Impact Report (PEIR)
Response to Comments

Dear Ms. Walter:

Thank you for your recent comments on the County of Los Angeles Bicycle Master Plan Draft Program Environmental Impact Report (PEIR) (your letter dated September 19, 2011). On behalf of the County of Los Angeles Department of Public Works, ICF is providing your agency with written proposed responses to your comments at least 10 days prior to certification of the PEIR (CEQA Guidelines §15088(b)). Please find attached your comment letter and the proposed responses.

The Regional Planning Commission for the County of Los Angeles is scheduled to take action on the adoption of the Bicycle Master Plan, including a recommendation on the certification of the PEIR, at its regular meeting on January 12, 2012. The Bicycle Master Plan approval and EIR certification will then be considered by the County of Los Angeles Board of Supervisors in March 2012.

Thank you for your interest in the County of Los Angeles Bicycle Master Plan PEIR.

Sincerely,

Donna McCormick, AICP
Project Manager

Attachment
City of Glendora Comment Letter and Response to Comments

cc: Reyna Soriano, County of Los Angeles Department of Public Works

Commenter B

CITY OF GLENDORA CITY HALL (626) 914-8200
116 East Foothill Blvd., Glendora, California 91741
www.ci.glendora.ca.us

September 19, 2011

County of Los Angeles Department of Public Works
Programs Development Division, 11th Floor
Attention Ms. Reyna Soriano
P.O. Box 1460
Alhambra, CA 91802-1460

RE: Notice of Availability - LA County Bicycle Master Plan

Dear Ms Soriano,

Thank you for providing the City of Glendora an opportunity to comment on the Los Angeles County Bicycle Master Plan Draft Environmental Impact Report. The City of Glendora is in strong support of upgrading and expanding the bicycle network throughout the San Gabriel Valley and the County as a whole. B-1

On April 28, 2011, we provided comments as part of the CEQA NOP process. The proposed draft master plan failed to address our comments with the exception of listing the recommended Bike Way along the Dalton Wash which is described as a bikeway "proposed by other jurisdictions". There is no clear explanation of what "proposed by other jurisdictions" means. We would like a clear explanation of the beige colored doted bikeway along Dalton Wash and what that implies for Glendora. B-2

In addition, please address our previous comments as shown below. B-3

1. Provide a connection from the existing Class III Bike Route on Gladstone Street westward to the proposed bike route in Covina.
2. Regarding the proposed route in Covina, it appears to be located along the Dalton Wash which extends through the City of Glendora up into Dalton Canyon. We would like to see the plan provide for the extension of the trail along the Dalton Wash all the way to Dalton Canyon. Also see comment No. 6.
3. Extend the proposed westbound route on Mauna Loa Avenue to connect with the proposed north-south street route in Azusa.
4. Connect the existing bike route on South Glendora Avenue to the proposed Class II bike lane along Arrow Highway.

5. Extend the Class III Bike Route eastward on Foothill Boulevard to connect with the existing bike lane on Foothill Boulevard in San Dimas.
6. One of the Master Plan proposals is to extend the Class III Bike Route on Glendora Mountain Road (GMR) up through the mountains into the National Forest area. You may be aware that Glendora Mountain Road is a very steep, winding road which is popular with advanced cyclists. Indeed, the Tour of California will be including GMR on one of their stages. Unfortunately, the road is also popular with auto traffic and we have had a number of tragic accidents on GMR in the past few months; one occurred last night. We would like to ask the County to explore the feasibility of creating either a Class I bike path or Class II bike lane on GMR to reduce the danger riders are experiencing. The proposed Class III bike route will not provide enough protection for cyclists. B-3

Please call me at 626-914-8218 or email dwalter@ci.glendora.ca.us if you have any questions.

Sincerely,

Dianne Walter,
Planning Manager

Attachment: NOP Comment letter stated April 28, 2011 from Glendora

Cc: Jerry Burke, City Engineer
Jeff Kugel, Director, Planning and Redevelopment

CITY OF GLENDORA CITY HALL (626) 914-8200
116 East Foothill Blvd., Glendora, California 91741
www.ci.glendora.ca.us

April 28, 2011

County of Los Angeles Department of Public Works
Programs Development Division, 11th Floor
Attention Ms. Reyna Soriano
P.O. Box 1460
Alhambra, CA 91802-1460

RE: Notice of Preparation - LA County Bicycle Master Plan

Dear Ms Soriano,

Thank you for providing the City of Glendora an opportunity to comment on the Los Angeles County Bicycle Master Plan. The City of Glendora is in strong support of upgrading and expanding the bicycle network throughout the San Gabriel Valley and the County as a whole.

We would like to offer the following suggestions for improving the proposed Bicycle Master Plan in the vicinity of Glendora:

1. Provide a connection from the existing Class III Bike Route on Gladstone Street westward to the proposed bike route in Covina.
2. Regarding the proposed route in Covina, it appears to be located along the Dalton Wash which extends through the City of Glendora up into Dalton Canyon. We would like to see the plan provide for the extension of the trail along the Dalton Wash all the way to Dalton Canyon.
3. Extend the proposed westbound route on Mauna Loa Avenue to connect with the proposed north-south street route in Azusa.
4. Connect the existing bike route on South Glendora Avenue to the proposed Class II bike lane along Arrow Highway.
5. Extend the Class III Bike Route eastward on Foothill Boulevard to connect with the existing bike lane on Foothill Boulevard in San Dimas.

B-3 cont

One of the Master Plan proposals is to extend the Class III Bike Route on Glendora Mountain Road (GMR) up through the mountains into the National Forest area. You may be aware that Glendora Mountain Road is a very steep, winding road which is popular with advanced cyclists. Indeed, the Tour of California will be including GMR on one of their stages. Unfortunately, the

B-4

road is also popular with auto traffic and we have had a number of tragic accidents on GMR in the past few months; one occurred last night. We would like to ask the County to explore the feasibility of creating either a Class I bike path or Class II bike lane on GMR to reduce the danger riders are experiencing. The proposed Class III bike route will not provide enough protection for cyclists.

B-4 cont

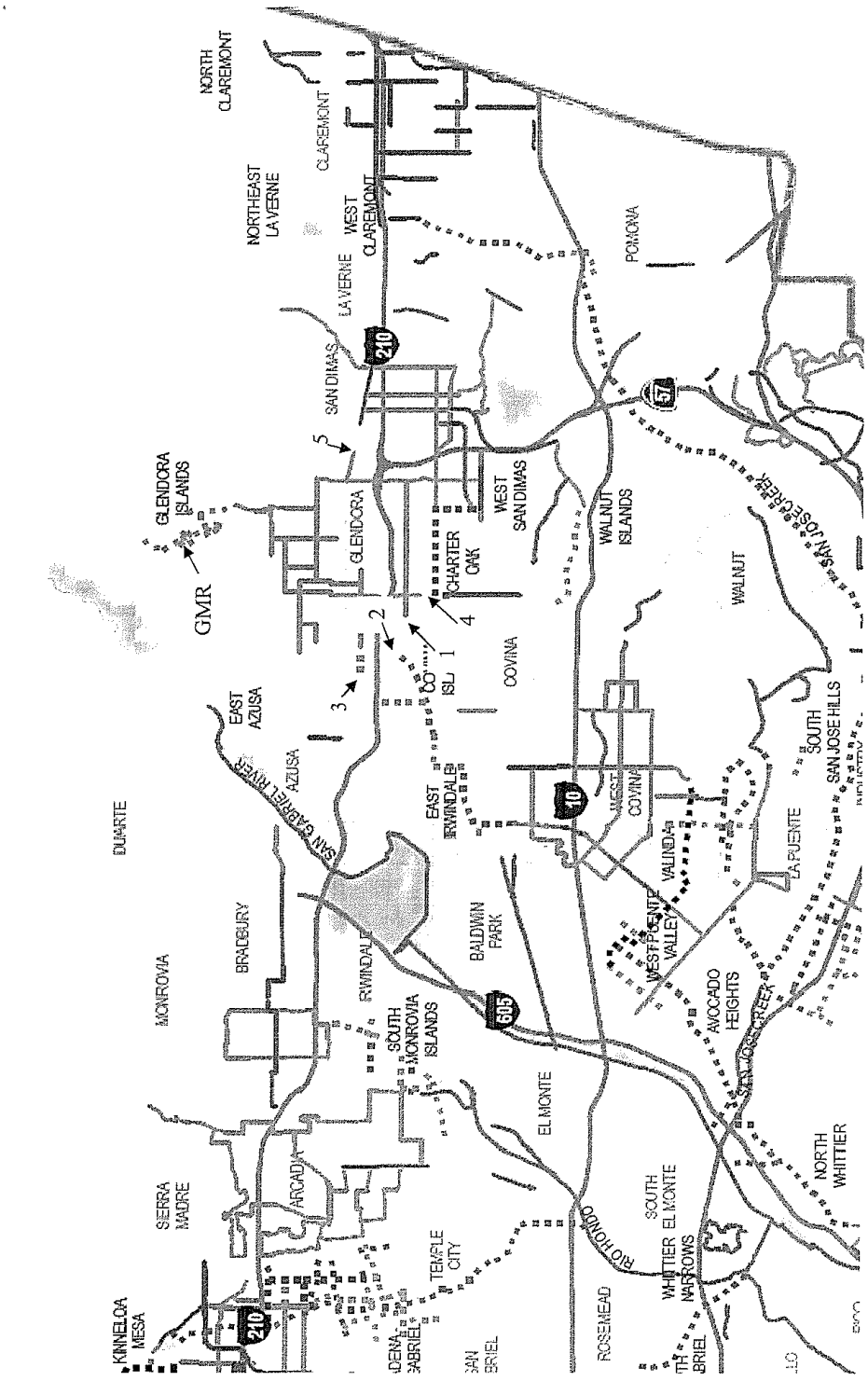
Please call me at 626-914-8218 or email dwalter@ci.glendora.ca.us if you have any questions.

Sincerely,

Dianne Walter,
Planning Manager

Attachment: Enlarged Master Plan of Glendora vicinity annotated to correspond to numbered suggestions

Cc: Jerry Burke, City Engineer
Jeff Kugel, Director, Planning and Redevelopment


NORTH CLAREMONT
CLAREMONT
NORTHEAST LA VERNE
WEST CLAREMONT
LA VERNE
SAN DIMAS
POMONA
GLENDORA ISLANDS
GMR
GLENDORA
CHARTER OAK
WEST SAN DIMAS
WALNUT ISLANDS
WALNUT
SAN JOSE CREEK
EAST AZUSA
AZUSA
SAN GABRIEL RIVER
COVINA ISL
COVINA
EAST IRWINDALE
DUARTE
BRADBURY
MONROVIA
IRWINDALE
BALDWIN PARK
WEST COVINA
VALINDA
WEST PUENTE VALLEY
LA PUENTE
SOUTH SAN JOSE HILLS
SOUTH MONROVIA ISLANDS
AVOCADO HEIGHTS
SIERRA MADRE
ARCADIA
EL MONTE
TEMPLE CITY
ROSEMEAD
SOUTH EL MONTE
WHITTIER NARROWS
NORTH WHITTIER
KINNELOA MESA
210
605
10
57
1
2
3
4
5

Response to Comment B-1
Expressing support for upgrading and expanding the bicycle network

This comment expresses strong support for upgrading and expanding the bicycle network throughout the San Gabriel Valley and the County as a whole, but it does not address environmental issues. In accordance with Section 15132 of the CEQA Guidelines, the Final PEIR need only respond to relevant environmental issues. This comment is outside the scope of the CEQA analysis. However, this comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

Response to Comment B-2
Requesting explanation of symbols and text in the Draft Bicycle Master Plan

The comment provided addresses the Bicycle Master Plan, not the Draft PEIR. This comment is outside the scope of the CEQA analysis. Therefore, no response in the Final PEIR is necessary. However this comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

Response to Comment B-3
Requesting additional bikeways or changes to bikeways in the Bicycle Master Plan

This comment requests a change in the project description (the Bicycle Master Plan), but it does not identify any environment impacts that would be avoided by changes to the Plan. In accordance with Section 15132 of the CEQA Guidelines, the Final PEIR need only respond to relevant environmental issues. This comment is outside the scope of the CEQA analysis. However, this comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

Response to Comment B-4
Requesting change in the Bicycle Master Plan

This comment requests a change in the project description (the Bicycle Master Plan) due to safety concerns, but it does not identify any environment impacts that would be avoided by changes to the Plan. In accordance with Section 15132 of the CEQA Guidelines, the Final PEIR need only respond to relevant environmental issues. This comment is outside the scope of the CEQA analysis. However, this comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

December 16, 2011

Amanda Merlo, Planning and Building Assistant
City of San Marino, Planning and Building Department
2200 Huntington Drive
San Marino, CA 91108-2639

Subject: County of Los Angeles Bicycle Master Plan
Final Program Environmental Impact Report (PEIR)
Response to Comments

Dear Ms. Merlo:

Thank you for your recent comments on the County of Los Angeles Bicycle Master Plan Draft Program Environmental Impact Report (PEIR) (your letter dated September 6, 2011). On behalf of the County of Los Angeles Department of Public Works, ICF is providing your agency with written proposed responses to your comments at least 10 days prior to certification of the PEIR (CEQA Guidelines §15088(b)). Please find attached your comment letter and the proposed responses.

The Regional Planning Commission for the County of Los Angeles is scheduled to take action on the adoption of the Bicycle Master Plan, including a recommendation on the certification of the PEIR, at its regular meeting on January 12, 2012. The Bicycle Master Plan approval and EIR certification will then be considered by the County of Los Angeles Board of Supervisors in March 2012.

Thank you for your interest in the County of Los Angeles Bicycle Master Plan PEIR.

Sincerely,

Donna McCormick, AICP
Project Manager

Attachment

City of San Marino, Planning and Building Department Comment Letter and Response to Comments

cc: Reyna Soriano, County of Los Angeles Department of Public Works

1 Ada Parkway, Suite 100 — Irvine, CA 92618 — 949.333.6600 — 949.333.6601 fax — icfi.com

PDD 605

City of San Marino
Planning & Building Department

Commenter C

September 6, 2011

County of Los Angeles Department of Public Works
Programs Development Division, 11th Floor
Attn: Ms. Reyna Soriano
P.O. Box 1460
Alhambra, CA 91802-1460

SUBJECT: RESPONSE TO THE COUNTY OF LOS ANGELES BICYCLE MASTER PLAN DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

Dear Ms. Soriano:

Thank you for the opportunity to review and comment on the County of Los Angeles Bicycle Master Plan Draft Program Environmental Impact Report. The City of San Marino has no comments regarding the project at this time. However, the City would be interested in receiving further information about the potential traffic impacts to the West San Gabriel Valley area of the project when such information becomes available. C-1

Please update my contact information as follows:

Amanda Merlo, Planning and Building Assistant
City of San Marino
2200 Huntington Drive
San Marino, CA 91108
626-300-0784
amerlo@cityofsanmarino.org

Please feel free to contact me should you have any questions or need additional information.

Sincerely,

AMANDA MERLO
Planning and Building Assistant

Response to Comment C-1

Requesting further information about traffic impacts in the West San Gabriel Valley area

The comment states that the City of San Marino has no comments regarding the project at this time but requests additional information about potential traffic impacts when such information is available. As stated in Section 3.6 of the Draft PEIR, "Traffic and Transportation," detailed analysis of traffic impacts will be required prior to implementation of individual Bicycle Master Plan projects as part of the project-level CEQA analysis. For any projects affecting traffic in the San Marino area, the City will be notified during the project-level analysis.

December 16, 2011

Joan Rupert, Section Head
County of Los Angeles
Department of Parks and Recreation
Environmental and Regulatory Permitting Section
510 South Vermont Avenue
Los Angeles, CA 90020-1975

Subject: County of Los Angeles Bicycle Master Plan
Final Program Environmental Impact Report (PEIR)
Response to Comments

Dear Ms. Rupert:

Thank you for your recent comments on the County of Los Angeles Bicycle Master Plan Draft Program Environmental Impact Report (PEIR) (your letter dated September 21, 2011). On behalf of the County of Los Angeles Department of Public Works, ICF is providing your agency with written proposed responses to your comments at least 10 days prior to certification of the PEIR (CEQA Guidelines §15088(b)). Please find attached your comment letter and the proposed responses.

The Regional Planning Commission for the County of Los Angeles is scheduled to take action on the adoption of the Bicycle Master Plan, including a recommendation on the certification of the PEIR, at its regular meeting on January 12, 2012. The Bicycle Master Plan approval and EIR certification will then be considered by the County of Los Angeles Board of Supervisors in March 2012.

Thank you for your interest in the County of Los Angeles Bicycle Master Plan PEIR.

Sincerely,

Donna McCormick, AICP
Project Manager

Attachment

County of Los Angeles, Department of Parks and Recreation Comment Letter and Response to Comments

cc: Reyna Soriano, County of Los Angeles Department of Public Works

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Creating Community Through People, Parks and Programs"
Russ Guiney, Director

Commenter D

September 21, 2011 sent via email:rsoriano@dpw.lacounty.gov

TO: Reyna Soriano
Department of Public Works

FROM: Joan Rupert, Section Head
Environmental and Regulatory Permitting Section

SUBJECT: **DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR) FOR THE COUNTY OF LOS ANGELES BICYCLE MASTER PLAN**

The Draft PEIR for the above project has been reviewed for potential impacts on the facilities of the Department of Parks and Recreation (DPR). We have determined that the previously submitted comments pertaining to DPR trails were adequately addressed. D-1

Thank you for including this Department in the review of this notice. If you have any trail related questions, please contact Mr. Francis Yee at (213) 639-6058 or email fyee@parks.lacounty.gov. For any other inquires, please contact Ms. Julie Yom at (213) 351-5127 or jyom@parks.lacounty.gov.

JR: JY/ Response to DPW_PEIR for Bicycle Master Plan

c: Parks and Recreation (N. E. Garcia, L. Hensley, F. Moreno, F. Yee, J. Yom)

Response to Comment D-1
Stating previous comments were adequately addressed

The comment states that the County of Los Angeles, Department of Parks and Recreation's previous comments have been adequately addressed. No response is necessary.

December 16, 2011

Dave Singleton, Program Analyst
Native American Heritage Commission
915 Capitol Mall, Room 364
Sacramento, CA 95814

Subject: **County of Los Angeles Bicycle Master Plan**
Final Program Environmental Impact Report (PEIR)
Response to Comments

Dear Mr. Singleton:

Thank you for your recent comments on the County of Los Angeles Bicycle Master Plan Draft Program Environmental Impact Report (PEIR) (your letter dated August 30, 2011). On behalf of the County of Los Angeles Department of Public Works, ICF is providing your agency with written proposed responses to your comments at least 10 days prior to certification of the PEIR (CEQA Guidelines §15088(b)). Please find attached your comment letter and the proposed responses.

The Regional Planning Commission for the County of Los Angeles is scheduled to take action on the adoption of the Bicycle Master Plan, including a recommendation on the certification of the PEIR, at its regular meeting on January 12, 2012. The Bicycle Master Plan approval and EIR certification will then be considered by the County of Los Angeles Board of Supervisors in March 2012.

Thank you for your interest in the County of Los Angeles Bicycle Master Plan PEIR.

Sincerely,

Donna McCormick, AICP
Project Manager

Attachment
Native American Heritage Commission Comment Letter and Response to Comments

cc: Reyna Soriano, County of Los Angeles Department of Public Works

1 Ada Parkway, Suite 100 — Irvine, CA 92618 — 949.333.6600 — 949.333.6601 fax — icfi.com

Commenter E

STATE OF CALIFORNIA — Edmund G. Brown, Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
ds_nahc@pacbell.net

August 30, 2011

Ms. Reyna Soriano, Environmental Planner
County of Los Angeles Department of Public Works
Programs Development Division, 11th Floor
P.O. Box 1460
Alhambra, CA 91802-1460

Re: SCH#2011041004; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the **"County of Los Angeles Bicycle Master Plan"** located throughout the County of Los Angeles, California.

Dear Ms. Soriano:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604). The NAHC wishes to comment on the proposed project.

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9.

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ...objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC Sacred Lands File (SLF) Inventory contains numerous **Native American cultural resources and Burial Grounds.** Contact Native Americans on the attached list for more detailed information and the possible impact of the proposed Bicycle corridors on these resources and burial sites. E-1

The NAHC "Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway.

Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you make contact with the list of Native American Contacts on the attached list. to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources. E-1

Furthermore, the NAHC is of the opinion that the current project remains under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.' E-2

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity. E-3

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery'. E-4

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects. E-5

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,

Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

California Native American Contact List
Los Angeles County
August 30, 2011

Charles Cooke
32835 Santiago Road
Acton , CA 93510
suscol@intox.net

(661) 733-1812 - cell
suscol@intox.net

Chumash
Fernandeno
Tataviam
Kitanemuk

Beverly Salazar Folkes
1931 Shadybrook Drive
Thousand Oaks, CA 91362
folkes@msn.com
805 492-7255
(805) 558-1154 - cell
folkes9@msn.com

Chumash
Tataviam
Ferrnandeño

Fernandeno Tataviam Band of Mission Indians
Ronnie Salas, Cultural Preservation Department
601 South Brand Boulevard, Suite 102
San Fernando CA 91340
rsalas@tataviam-nsn.gov
(818) 837-0794 Office

(818) 837-0796 Fax

Fernandeno
Tataviam

Barbareno/Ventureno Band of Mission Indians
Julie Lynn Tumamait, Chairwoman
365 North Poli Ave
Ojai , CA 93023
jtumamait@sbcglobal.net
(805) 646-6214

Chumash

Patrick Tumamait
992 El Camino Corto
Ojai , CA 93023
(805) 640-0481
(805) 216-1253 Cell

Chumash

LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 6th St, Rm. 403
Los Angeles , CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

Owl Clan
Qun-tan Shup
48825 Sapaque Road
Bradley , CA 93426
mupaka@gmail.com
(805) 472-9536 phone/fax
(805) 835-2382 - CELL

Chumash

Ti'At Society/Inter-Tribal Council of Pimu
Cindi M. Alvitre, Chairwoman-Manisar
3098 Mace Avenue, Aapt. D
Costa Mesa, , CA 92626
calvitre@yahoo.com
(714) 504-2468 Cell

Gabrielino

This list is current only as of the date of this document.
Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed sCH#2011041004; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the County of Los Angeles Bicycle Master Plan; also requires a General Plan Amendment; location is throughout the County of Los Angeles, California.

California Native American Contact List
Los Angeles County
August 30, 2011

Tehachapi Indian Tribe
Attn: Charlie Cooke
32835 Santiago Road
Acton , CA 93510
suscol@intox.net
(661) 733-1812
Kawaiisu

Gabrieleno/Tongva San Gabriel Band of Mission
Anthony Morales, Chairperson
PO Box 693
San Gabriel , CA 91778
GTTribalcouncil@aol.com
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 -FAX
Gabrielino Tongva

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Private Address
,
tattnlaw@gmail.com
310-570-6567
Gabrielino Tongva

Randy Guzman - Folkes
655 Los Angeles Avenue, Unit E
Moorpark , CA 93021
ndnRandy@yahoo.com
(805) 905-1675 - cell
Chumash
Fernandeño
Tataviam
Shoshone Paiute
Yaqui

Kitanemuk & Yowlumne Tejon Indians
Delia Dominguez, Chairperson
981 N. Virginia
Covina , CA 91722
deedominguez@juno.com
(626) 339-6785
Yowlumne
Kitanemuk

Gabrielino Tongva Nation
Sam Dunlap, Chairperson
P.O. Box 86908
Los Angeles , CA 90086
samdunlap@earthlink.net

(909) 262-9351 - cell
Gabrielino Tongva

San Fernando Band of Mission Indians
John Valenzuela, Chairperson
P.O. Box 221838
Newhall , CA 91322
tsen2u@hotmail.com
(661) 753-9833 Office
(760) 885-0955 Cell
(760) 949-1604 Fax
Fernandeño
Tataviam
Serrano
Vanyume
Kitanemuk

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
P.O. Box 490
Bellflower , CA 90707
gtongva@verizon.net
562-761-6417 - voice
562-761-6417- fax
Gabrielino Tongva

This list is current only as of the date of this document.
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This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed sCH#2011041004; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the County of Los Angeles Bicycle Master Plan; also requires a General Plan Amendment; location is throughout the County of Los Angeles, California.

California Native American Contact List
Los Angeles County
August 30, 2011

Carol A. Pulido
165 Mountainview Street Chumash
Oak View , CA 93022
805-649-2743 (Home)

Gabrielino-Tongva Tribe
Linda Candelaria, Chairwoman
1875 Century Park East, Suite 1500
Los Angeles , CA 90067 Gabrielino
lcandelaria1@gabrielinoTribe.org
626-676-1184- cell
(310) 587-0170 - FAX
760-904-6533-home

Melissa M. Parra-Hernandez
119 North Balsam Street Chumash
Oxnard , CA 93030
envyy36@yahoo.com
805-983-7964

Santa Ynez Tribal Elders Council
Freddie Romero, Cultural Preservation Conslnt
P.O. Box 365 Chumash
Santa Ynez , CA 93460
805-688-7997, Ext 37
freddyromero1959@yahoo.com

Frank Arredondo
PO Box 161 Chumash
Santa Barbara Ca 93102
ksen_sku_mu@yahoo.com
805-617-6884
ksen_sku_mu@yahoo.com

Aylisha Diane Marie Garcia Napoleone
33054 Decker School Road Chumash
Malibu , CA 90265
702-741-6935

Gabrielino-Tongva Tribe
Bernie Acuna
1875 Century Pk East #1500 Gabrielino
Los Angeles , CA 90067
(619) 294-6660-work
(310) 428-5690 - cell
(310) 587-0170 - FAX
bacuna1@gabrieinotribe.org

Gabrieleno Band of Mission Indians
Andrew Salas, Chairperson
P.O. Box 393 Gabirelino Tongva
Covina , CA 91723
(626) 926-4131
gabrielenoindians@yahoo.com

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This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed sCH#2011041004; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the County of Los Angeles Bicycle Master Plan; also requires a General Plan Amendment; location is throughout the County of Los Angeles, California.

Response to Comment E-1

Requesting analysis of impacts to historical resources, including consultation with Native American tribes, and encouraging avoidance as the primary method for mitigation

The Draft PEIR provided a program-level analysis of the potential for impacts to cultural resources in Section 3.4, "Cultural Resources." The type of analysis requested in this comment is more appropriate at the project level, when further information about actual project footprints will be available.

Section 3.4, "Cultural Resources," states that site-specific analysis of impacts to archaeological resources and historical resources will be required prior to implementation of any Bicycle Master Plan project. These project-level analyses will include literature and record searches and field surveys, and will be carried out by qualified archaeologists, historians, and architectural historians, as appropriate. It is standard procedure to review the Native American Heritage Commissions Sacred Lands Files during these analyses, as well as to consult with Native American tribes.

Mitigation Measures MM 3.4-1 and MM 3.4-2 specifically list avoidance first as the preferred method of mitigating impacts.

Response to Comment E-2

Stating an opinion that the project requires compliance with the National Environmental Policy Act (NEPA)

The comment does not state a reason why NEPA would be triggered by the project. This comment is outside the scope of the CEQA analysis. However, this comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

Response to Comment E-3

Requesting confidentiality of "historic properties of religious and cultural significance"

The comment does not address the Draft PEIR. The confidentiality requirements for historic properties of religious and cultural significance are a standard practice of professional archaeologists and historians and will be observed during project-level CEQA analyses.

Response to Comment E-4
***Requesting compliance with Public Resources Code Section 5097.98, California Government code Section 27491, and Health and Safety Code Section 7050.5 related to accidental discoveries during construction*)**

The comment does not address the Draft PEIR. Compliance with the cited codes is a standard practice for professional archaeologists and historians and will be included in the treatment plans at the project level.

Response to Comment E-5
Requesting consultation with Native American tribes

See response to Comment E-1, above. At the project level, the CEQA process will include appropriate consultation with the affected Native American tribes.

December 16, 2011

John Ballas, City Engineer
City of Industry
P.O. Box 3366
City of Industry 91744-0366

Subject: County of Los Angeles Bicycle Master Plan
Final Program Environmental Impact Report (PEIR)
Response to Comments

Dear Mr. Ballas:

Thank you for your recent comments on the County of Los Angeles Bicycle Master Plan Draft Program Environmental Impact Report (PEIR) (your letter dated August 25, 2011). On behalf of the County of Los Angeles Department of Public Works, ICF is providing your agency with written proposed responses to your comments at least 10 days prior to certification of the PEIR (CEQA Guidelines §15088(b)). Please find attached your comment letter and the proposed responses.

The Regional Planning Commission for the County of Los Angeles is scheduled to take action on the adoption of the Bicycle Master Plan, including a recommendation on the certification of the PEIR, at its regular meeting on January 12, 2012. The Bicycle Master Plan approval and EIR certification will then be considered by the County of Los Angeles Board of Supervisors in March 2012.

Thank you for your interest in the County of Los Angeles Bicycle Master Plan PEIR.

Sincerely,

Donna McCormick, AICP
Project Manager

Attachment
City of Industry Comment Letter and Response to Comments

cc: Reyna Soriano, County of Los Angeles Department of Public Works

Commenter F

CITY OF INDUSTRY

Incorporated June 18, 1957

August 25, 2011

Ms. Reyna Soriano
County of Los Angeles Department of Public Works
Programs Development Division, 11th Floor
P.O. Box 1460
Alhambra, CA 91802-1460

Mr. Sam Corbett, Project Lead
Alta Planning & Design
453 S. Spring St., Ste 804
Los Angeles, CA 90013

Subject: County of Los Angeles Bicycle Master Plan Draft Program Environmental Impact Report

F-1

Dear Ms. Soriano:

Thank you for the opportunity to review the County of Los Angeles Bicycle Master Plan Draft Program Environmental Impact Report (PEIR). The City of Industry supports bicycle travel within the region, however, it is concerned about the safety of bicyclists along our streets and the preservation of the present level of service "LOS" within its system of roadways. The streets in the City of Industry are unique in that there is no curbside parking. Each street, regardless of classification, is either painted as "red curb" or signed for "no street parking". There are no truck restrictions by size or weight on any streets in the City

In order to support high traffic levels (especially regional traffic on north-south streets) it is common practice in Industry to fully utilize the existing curb to curb width for traffic lanes. As a recent example, a third lane was added along Valley Boulevard in the east-west direction from Azusa Avenue to Grand Avenue which effectively utilized the entire right of way for vehicular travel. Given the 2 foot gutter next to the curb, there is not adequate width remaining to accommodate on-street bicycle travel without forcing cyclists into the vehicular lanes.

The Draft County of Los Angeles Bicycle Master Plan and the PEIR should:

- Remove the designation of Class II bike lanes from the following streets in the City;
  1) Puente Avenue (northerly of Valley Blvd.)
  2) Nogales Street (Valley Blvd. to Gale Ave.)
  3) Gale Avenue (7th Ave. to Stimson Ave.)
  4) Vineland Avenue (Valley Blvd. to Nelson Ave.)
  5) Echelon Avenue

F-2

- Address the feasibility of constructing bicycle paths along the San Jose Creek "SJC" without the use of mid-block crossings, which have been demonstrated to be dangerous by giving the pedestrian or cyclist a "false" sense of security while crossing. In most instances, the San Jose Creek crosses under streets where there is no nearby signalized intersection to protect bicyclists using the SJC bike bath. Alternatively, the use of under crossings (commonly seen along the San Gabriel River and Santa Ana River trails) may be difficult to construct given the close proximity of existing bridge abutments to the vertical concrete wall of the SJC at each street crossing.

P.O. Box 3366, City of Industry, California 91744-0366 • Administrative Offices: 15625 E. Stafford St. • (626) 333-2211 • Fax (626) 961-6795

F-3

- The PEIR should address the potential impacts to adjacent land uses that may be necessary to accommodate the proposed bicycle lanes/routes, especially if widening is required.

F-4

- Address the safety of bicyclists in the bike paths, lanes, and routes in the locations proposed in the City of Industry. Specifically, is it safe to ride bicycles on the streets in the City of Industry given the volume of trucks/vehicles and roadway configurations?

F-5

- Discuss methods for incorporating local preferences.
- Provide alternative bicycle facility types, widths, or configurations.
- Address the provision of flexible designs and alignments that respond to local conditions.

F-6

In regards to the bicycle paths proposed along the San Jose and Puente Creeks, the City has been coordinating closely with the Watershed Conservation Authority, the County of Los Angeles Department of Parks and Recreation, Los Angeles County Flood Control District, local jurisdictions, SGVCOG, and other stakeholders studying an east-west bicycle connector along the two creeks. The City of Industry provided the following feedback in the attached letter dated March 17, 2011 to the coalition so that a bike path can be designed that addresses our unique circumstances:

- The path will remain in the creek channel right-of-way (channel and paralleling maintenance roads) and there will not be mid-block crossings within the City.
- Pocket-parks and rest-stops will not be located within the City.
- The City will not be responsible for the financing, planning, engineering, construction, or maintenance of the bike path.
- Grants and funding sources will not limit or restrict the planning or use of the San Jose Creek Channel for other purposes, such as truck/vehicular transportation.

The Draft County of Los Angeles Bicycle Master Plan and the PEIR should consider these factors in the design and analysis of bike paths in the City of Industry. Specifically, the PEIR should address the potential impact to the level of service on city streets and the safety of bicyclists. In addition, the PEIR should address the land use and security implications of locating a bike path along the back-side of businesses.

Thank you for your consideration and please feel free to contact me should you have any questions or concerns.

Sincerely,

John Ballas
City Engineer

JDB/BJ:mk

Enclosure

CITY OF INDUSTRY

P.O. Box 3366 • 15625 E. Stafford St. • City of Industry, CA 91744-0366 • (626) 333-2211 • FAX (626) 961-6795

MEMORANDUM

To: East-West Trail Technical Advisory Committee

March 17, 2011

From: Brian James, Senior Planner

Subject: San Jose Creek Channel Trail Connection

General Comments
In theory, the City of Industry can support a bike path within its boundaries on the San Jose Creek under certain conditions. Due to the function of the City's streets as truck lanes, inadequate outside lane widths to support bike lanes, safety concerns, high traffic levels (especially regional traffic levels on north-south streets), and the need to preserve security on the back-side of businesses within the City, the City can support a bike path in the San Jose Creek channel within its boundaries under the following conditions:

- The bike path stays in the creek channel
- There are no mid-block crossings
- There are no pocket-parks and rest-stops
- The City is not responsible for the financing, planning, engineering, construction, or maintenance of the bike path

Please note that SCAG is also proposing a truck by-pass on the San Jose Creek and the City will not support a bike path wherein the funding or conditions preclude a truck bypass option. We strongly urge that the design for these facilities be coordinated.

Tour Comments

- Point of Interest 2: The City discourages bicycling on its streets due to insufficient outside lane width and safety concerns. In the pending General Plan update, Staff is proposing that the bicycle travel be accommodated on its sidewalks. Any trail connecting to City streets would have to include clear notification and directional signage to this effect.
- Point of Interest 3: There is an approved container storage and logistics development on this site. Due to security concerns, the City will not support a bike path that includes park facilities and rest stops in its boundaries.
- Point of Interest 4: The City discourages bicycling on its streets due to insufficient outside lane width and safety concerns. In the pending General Plan update, Staff is proposing that the bicycle travel be accommodated on its sidewalks. Any trail connecting to City streets would have to include clear notification and directional signage to this effect.
- Stop 1: It is the City's understanding that the Shabarum Trail is abandoned.
- Stop 2: The City's boundary wraps around this intersection. The City of industry can support a bike path in the creek channel as long as it stays in the creek channel and there are no mid-block crossings.
- Stop 3: The City discourages bicycling on its streets due to insufficient outside lane width and safety concerns. In the pending General Plan update, Staff is proposing that the bicycle travel be accommodated on its sidewalks. Any trail connecting to City streets

F-6

would have to include clear notification and directional signage to this effect.

Alternative Route
The City suggests that an alternative route along the Puente Creek be explored (see attached map). This route has the following benefits:

- It is routed largely through residential neighborhoods with pedestrian-level commercial and service amenities befitting bicycle travel
- It would connect to the shopping center in and around West Covina's Field of Dreams on Azusa
- It avoids the fractured ownership patterns of the San Jose Creek through the City of Industry
- It may avoid the condition that the trail stay within the creek channel, which may make mid-block crossings feasible on less heavily traveled streets.
- It avoids the "back-of-shop" conditions though the City of Industry and may be more scenic.
- It avoids security concerns of business that store materials and goods along the creek channel.
- The San Jose Creek west of the Puente Creek is wide enough (205'+) to accommodate the truck lanes as well as a bike path. As you head east of Puente Creek the right of way gets much tighter (120' +/-) and it would be a design challenge to have both facilities sharing the flood control right of way.

F-6

Response to Comment F-1
Requesting changes to bikeways in the Bicycle Master Plan

This comment requests changes in the project description (the Bicycle Master Plan), stating that the City of Industry is concerned about safety of bicyclists and preservation of the current level of service (LOS) on the roadways. The comment does not provide any evidence for LOS impacts. As discussed in Section 3.6 of the Draft PEIR, "Traffic and Transportation," detailed analysis of traffic impacts will be required prior to implementation of any of the individual Bicycle Master Plan projects that would require closure of lanes, widening of existing roadways, or other changes to a roadway that would affect traffic. Mitigation Measure MM 3.6-2 requires implementation of traffic study recommendations and requires that LOS be maintained at acceptable levels.

Response to Comment F-2
Providing design recommendations for a project in the Bicycle Master Plan

The comment includes specific design recommendations for the proposed San Jose Creek Bicycle Path. These detailed design recommendations are outside the scope of the PEIR but will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

Response to Comment F-3
Requesting that the PEIR address land use impacts of widening roadways to accommodate bikeways

The Draft PEIR did not address land use issues. During the Initial Study, it was determined that the Bicycle Master Plan would not have the potential to result in significant impacts to land use. No comments were received during the comment period on the Initial Study (scoping period) providing evidence that significant land use impacts may occur as a result of the Bicycle Master Plan. The comment also does not provide evidence that significant land use impacts would occur.

Widening to accommodate bikeways would be minor and would not be expected to result in changes to land use on adjacent properties.

Response to Comment F-4
Requesting that the PEIR address safety of bicyclists in the City of Industry

As stated in the response to Comment F-1, detailed analysis of traffic impacts (including safety) will be required prior to implementation of any of the individual Bicycle Master Plan projects. This analysis is only possible when the specific bikeway designs are available, at the project level.

Response to Comment F-5

Requesting that the PEIR discuss methods for incorporating local preferences, alternative configurations, and flexible designs

The PEIR is not the correct venue for incorporating local preferences, alternative configurations, or flexible designs, except as mitigation for significant impacts. Otherwise, these methods are part of the planning process for the Bicycle Master Plan. The Draft PEIR analyzed the impacts of the Bicycle Master Plan but is separate from the planning process for the Bicycle Master Plan. Because this comment does not identify any environmental issues, no response is necessary. The comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

Response to Comment F-6

Providing a summary of earlier recommendations on bicycle path designs along the San Jose and Puente creeks and requesting consideration in the PEIR (previous letter to the East-West Technical Advisory Committee attached)

The previous correspondence that is summarized in the comment was part of the planning process for the Bicycle Master Plan, and precedes the environmental process (dated March 17, 2011, with the Notice of Preparation for the PEIR filed April 4, 2011). The summary does not address environmental issues, but rather addresses design and funding issues. Because this comment does not identify any environmental issues, no response is necessary. The comment will be provided to the decision makers for their consideration during the Bicycle Master Plan approval process.

December 16, 2011

Jacob Lieb, Manager
Southern California Association of Governments
Environmental and Assessment Services
Pico Rivera, CA 90660

Subject: County of Los Angeles Bicycle Master Plan
Final Program Environmental Impact Report (PEIR)
Response to Comments

Dear Mr. Lieb:

Thank you for your recent comments on the County of Los Angeles Bicycle Master Plan Draft Program Environmental Impact Report (PEIR) (your letter dated September 21, 2011). On behalf of the County of Los Angeles Department of Public Works, ICF is providing your agency with written proposed responses to your comments at least 10 days prior to certification of the PEIR (CEQA Guidelines §15088(b)). Please find attached your comment letter and the proposed responses.

The Regional Planning Commission for the County of Los Angeles is scheduled to take action on the adoption of the Bicycle Master Plan, including a recommendation on the certification of the PEIR, at its regular meeting on January 12, 2012. The Bicycle Master Plan approval and EIR certification will then be considered by the County of Los Angeles Board of Supervisors in March 2012.

Thank you for your interest in the County of Los Angeles Bicycle Master Plan PEIR.

Sincerely,

Donna McCormick, AICP
Project Manager

Attachment
Southern California Association of Governments Comment Letter and Response to Comments

cc: Reyna Soriano, County of Los Angeles Department of Public Works

Commenter H

SOUTHERN CALIFORNIA
ASSOCIATION of GOVERNMENTS

Main Office
818 West Seventh Street
12th Floor
Los Angeles, California
90017-3435

t (213) 236-1800
f (213) 236-1825

www.scag.ca.gov

September 21, 2011

Ms. Reyna Soriano
P.O. Box 1460
Alhambra, CA 91802-1460
rsoriano@dpw.lacounty.gov

RE: SCAG Comments on the Draft Program Environmental Impact Report for the County of Los Angeles Bicycle Master Plan [SCAG No. I20110086]

Dear Ms. Soriano:

Thank you for submitting the **Draft Environmental Impact Report for the County of Los Angeles Bicycle Master Plan [SCAG No. I20110086]** to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review). Additionally, pursuant to Public Resources Code Section 21083(d) SCAG reviews Environmental Impacts Reports of projects of regional significance for consistency with regional plans per the California Environmental Quality Act (CEQA) Guidelines, Sections 15125(d) and 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Federal Transportation Improvement Program (FTIP) under California Government Code Section 65080 and 65082. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

SCAG staff has reviewed this project and determined that the proposed project is regionally significant per California Environmental Quality Act Guidelines, Sections 15125 and/or 15206. The proposed Water Management Plan Update includes address change in water supply reliability and in the environment for the planning period of 2010 - 2045. The proposed project is a vision for a diverse regional bicycle system of interconnected bicycle corridors, support facilities and programs to make bicycling more practical and desirable to a broad range of people in the County of Los Angeles. It intends to guide the development and maintenance of a comprehensive bicycle network and set of programs throughout the County's unincorporated communities for the next 20 years.

We have evaluated this project based on the policies of SCAG's Regional Transportation Plan (RTP) and Compass Growth Vision Principles that may be applicable to your project. The RTP and Compass Growth Visioning Principles can be found on the SCAG web site at: http://scag.ca.gov/igr. The attached detailed comments are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. We also encourage the use of the SCAG List of Mitigation Measures extracted from the RTP to aid with demonstrating consistency with regional plans and policies. Please send a copy of the Final Environmental Impact Report (FEIR) ONLY to SCAG's main office in Los Angeles for our review. If you have any questions regarding the attached comments, please contact Pamela Lee at (213) 236-1895. Thank you. H-1

Sincerely,

JACOB LIEB, Manager
Environmental and Assessment Services

September 21, 2011 **SCAG No. I20110086**
Ms. Soriano

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE COUNTY OF LOS ANGELES BICYCLE MASTER PLAN [SCAG NO. I20110086]

PROJECT LOCATION

Los Angeles County is geographically one of the largest in the nation. It stretches along 75 miles of the Pacific Coast of Southern California and is bordered to the east by Orange and San Bernardino Counties, to the north by Kern County and to the west by Ventura County. Los Angeles County also includes offshore islands of Santa Catalina and San Clemente.

The unincorporated areas of the County comprise 2,656.6 miles of the County's 4,083.2 square miles, or 65% of the County's total land area. Majority of the incorporated county land is located in the northern part of the county consisting of 124 separate, noncontiguous land areas. Los Angeles County is heavily urbanized, and most of the undeveloped land that remains is within unincorporated areas.

PROJECT DESCRIPTION

The purpose of the Bicycle Master Plan ("Plan") is to guide the development of infrastructure, policies and programs to improve the bicycling environment in Los Angeles County. The Plan coordinates bicycling planning efforts within the county and with other agencies to expand the existing bikeway network, connect gaps, address constrained areas, provide greater local and regional connectivity, and encourage more residents to bicycle more often. The Plan is a supplementary document to the Los Angeles County General Plan ("General Plan"), providing more detailed bicycle planning and policy direction that is currently adopted in the General Plan. The proposed project also aims to replace the 1975 *Plan of Bikeways* and will also become a sub-element to the Transportation Element of the General Plan and eventually become incorporated into the 2035 Los Angeles County General Plan Update. The Plan is organized by planning area boundaries consistent with the Draft 2035 Los Angeles County General Plan Update. H-2

The proposed project's primary objective is to create a more bicycle-friendly environment in Los Angeles County through the implementation of the Bicycle Master Plan, which would benefit County residents and visitors. As a secondary objective, the County proposes to contribute to resolving several complex and interrelated issues, including traffic congestion, air quality, climate change, public health and livability. By guiding unincorporated areas toward bicycle-friendly development, this Plan can affect all of these issue areas, which collectively can have a profound effort on the existing and future quality of life in the County.

The overall vision established in the Plan involves increasing bicycling throughout the County of Los Angeles through the development and implementation of bicycle-friendly policies, programs and infrastructure. The goals and policies necessary to implement the Plan are listed below:

- **Goal 1 – Bikeway System**: Expanded, improved and interconnected system of County bikeways and bikeway support facilities
- **Goal 2 – Safety**: Increased safety of roadways for all users
- **Goal 3 – Education**: Developed education programs that promote safe bicycling
- **Goal 4 – Encouragement Programs**: County residents that are encouraged to walk or ride a bike for transportation and recreation
- **Goal 5 – Community Support**: Community supported bicycle network
- **Goal 6 – Funding**: Funded Bikeway Plan

Currently, the County maintains approximately 144 miles of existing Class I, II, and III bikeways. The Plan proposes an interconnected network of bicycle corridors adding approximately 695 miles of new bikeways enabling residents to bicycle with greater safety, directness and convenience within and between major regional destinations and activity centers.

September 21, 2011 **SCAG No. I20110086**
Ms. Soriano

CONSISTENCY WITH REGIONAL TRANSPORTATION PLAN

Regional Growth Forecasts

The Draft Environmental Impact Report (DEIR) should reflect the most recently adopted SCAG forecasts, which are the 2008 RTP (May 2008) Population, Household and Employment forecasts. The forecasts for your region, subregion, and city are as follows:

Adopted SCAG Regionwide Forecasts[1]

	2010	2015	2020	2025	2030	2035
Population	19,418,344	20,465,830	21,468,948	22,395,121	23,255,377	24,057,286
Households	6,086,986	6,474,074	6,840,328	7,156,645	7,449,484	7,710,722
Employment	8,349,453	8,811,406	9,183,029	9,546,773	9,913,376	10,287,125

Adopted Los Angeles County Forecasts[1]

	2010	2015	2020	2025	2030	2035
Population	1,188,321	1,282,624	1,378,396	1,471,608	1,561,983	1,648,694
Households	325,615	357,468	391,383	417,848	443,414	464,468
Employment	320,171	336,371	346,717	358,881	371,868	384,300

1. The 2008 RTP growth forecast at the regional, subregional, and city level was adopted by the Regional Council in May 2008.

H-2

SCAG Staff Comments:

Based on the information provided in the DEIR, SCAG staff cannot determine whether the DEIR population, household and employment analyses were based on the 2008 RTP Regional Growth Forecasts.

The **2008 Regional Transportation Plan (RTP)** also has goals and policies that are pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

Regional Transportation Plan Goals:

RTP G1 *Maximize mobility and accessibility for all people and goods in the region.*
RTP G2 *Ensure travel safety and reliability for all people and goods in the region.*
RTP G3 *Preserve and ensure a sustainable regional transportation system.*
RTP G4 *Maximize the productivity of our transportation system.*
RTP G5 *Protect the environment, improve air quality and promote energy efficiency.*
RTP G6 *Encourage land use and growth patterns that complement our transportation investments.*
RTP G7 *Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.*

H-3

SCAG Staff Comments:

Where applicable, SCAG staff finds that the proposed project partially meets consistency with Regional Transportation Plan Goals. RTP G6 and G7 are not applicable to the proposed project.

SCAG staff finds that the proposed project meets consistency with RTP G1. The proposed project will

supplement the Mobility Element of the Draft 2035 General Plan Update as a sub-element that will improve and assist in creating an efficient multimodal transportation system that serves the needs of all County residents (Page 3.6-83).

SCAG staff finds that the proposed project meets consistency with RTP G2. Per page, 3.6-94, safety is improved with the creation of Class I bike paths due to the effective separation of bicyclists and pedestrians from motorized circulation. Also the proposed project provides the benefit of fewer vehicular trips which reduces traffic congestion and improves reliability of the overall transportation system (Page 2-3).

Per RTP G3, SCAG staff finds the proposed project consistent. The Bicycle Master Plan intends to guide the development and maintenance of a comprehensive bike network which will introduce maintenance costs but also alleviate other roadway costs due to reduced vehicular trips through road diets (ES-8). H-3

Per RTP G4, the proposed project meets consistency. Per page 3.6-93, the proposed project will implement a Traffic Control Plan to avoid creating additional delay at intersection currently operating at congested conditions.

SCAG staff finds that the proposed project partially meets consistency with RTP G5. Generally, the proposed project makes efforts to protect biological, agricultural, and water resources by implementing mitigation measures to avoid potentially significant impacts (Page 3.2-26). However, the project construction has the potential to negatively impact air quality through the use of onsite construction equipment and emissions (Page 3.7-117).

COMPASS GROWTH VISIONING

The fundamental goal of the **Compass Growth Visioning** effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region's mobility, livability and prosperity. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

Principle 1: Improve mobility for all residents.

GV P1.1 *Encourage transportation investments and land use decisions that are mutually supportive.*
GV P1.2 *Locate new housing near existing jobs and new jobs near existing housing.*
GV P1.3 *Encourage transit-oriented development.*
GV P1.4 *Promote a variety of travel choices* H-4

SCAG Staff Comments:

SCAG staff finds that the proposed project partially meets consistency with Principle 1 where applicable. Principle GV P1.2 is not applicable in that the development is a transportation infrastructure project and does not affect the housing/jobs ratio.

SCAG staff finds the proposed project generally meets consistency with GV P1.1. Per page 2-2, proposed project will replace existing transportation infrastructure and further expand local and regional connectivity within the existing network.

September 21, 2011 **SCAG No. I20110086**
Ms. Soriano

SCAG staff cannot determine consistency with GV P1.3 based on the information provided in the DEIR.

Per GV P1.4, SCAG staff finds the proposed project is consistent. Per page 3.6-90, the proposed project would encourage the use of bicycles instead of cars; therefore reducing the number of automobile vehicle trips and the total vehicle miles traveled in the County achieved through travelers changing transportation modes. The bicycle network can also be used by pedestrians as well as bicyclists. H-4

Principle 2: Foster livability in all communities.

GV P2.1 *Promote infill development and redevelopment to revitalize existing communities.*
GV P2.2 *Promote developments, which provide a mix of uses.*
GV P2.3 *Promote "people scaled," walkable communities.*
GV P2.4 *Support the preservation of stable, single-family neighborhoods.*

SCAG Staff Comments:

SCAG staff finds that the proposed project partially meets consistency with Principle 2.

SCAG staff cannot determine consistency with GV P2.1 and GV P2.2 based on the information provided in the DEIR.

SCAG staff finds the proposed project meets consistency with GV P2.3. The proposed project promotes walkability and development of bicycle and pedestrian improvements throughout the County (Page 3.6-82). H-5

Per GV P2.4, SCAG staff finds the proposed project consistent. The existing neighborhoods will be preserved as the proposed project aims to improve connectivity of bicycle infrastructure between existing neighborhoods (A-45).

Principle 3: Enable prosperity for all people.

GV P3.1 *Provide, in each community, a variety of housing types to meet the housing needs of all income levels.*
GV P3.2 *Support educational opportunities that promote balanced growth.*
GV P3.3 *Ensure environmental justice regardless of race, ethnicity or income class.*
GV P3.4 *Support local and state fiscal policies that encourage balanced growth*
GV P3.5 *Encourage civic engagement.*

SCAG Staff Comments:

SCAG staff finds that the proposed project partially meets consistency with Principle 3 where applicable. Principles GV P3.1 are not applicable in that the proposed project does not include residential development.

Per GV P3.2, SCAG staff finds the proposed project consistent. The Bicycle Master Plan will include education programs that will contribute to enhancing safety by ensuring bicyclists, pedestrians and motorists understand how to travel safely in the roadway environment (Page 3.6-96). H-6

SCAG staff cannot determine consistency with GV P3.3, GV P3.4 and GV P3.5 based on the information provided in the DEIR.

September 21, 2011 **SCAG No. I20110086**
Ms. Soriano

Principle 4: Promote sustainability for future generations.

GV P4.1	*Preserve rural, agricultural, recreational, and environmentally sensitive areas*
GV P4.2	*Focus development in urban centers and existing cities.*
GV P4.3	*Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*
GV P4.4	*Utilize "green" development techniques*

SCAG Staff Comments:

Where applicable, SCAG staff finds that the project is partially consistent with Principle 4.

SCAG staff cannot determine consistency with GV P4.1 based on the information provided in the DEIR. H-7

Per GV P4.2, SCAG staff finds the proposed project consistent with GV P4.2. The proposed project will expand and further connect urban areas and regional destinations through bicycle infrastructure (A-2).

SCAG staff cannot determine consistency with GV P4.3 and GV P4.4 based on the information provided in the DEIR.

CONCLUSION

Where applicable, the proposed project generally meets consistency with SCAG Regional Transportation Plan Goals and also meets consistency with Compass Growth Visioning Principles.

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA. We recommend that you review the SCAG List of Mitigation Measures for additional guidance, and encourage you to follow them, where applicable to your project. The SCAG List of Mitigation Measures may be found here: H-8
http://www.scag.ca.gov/igr/documents/SCAG_IGRMMRP_2008.pdf

When a project is of statewide, regional, or area wide significance, transportation information generated by a required monitoring or reporting program shall be submitted to SCAG as such information becomes reasonably available, in accordance with CEQA, Public Resource Code Section 21081.7, and CEQA Guidelines Section 15097 (g).

Response to Comment H-1

Encouraging the use of the SCAG List of Mitigation Measures, extracted from the Regional Transportation Plan [RTP], to aid with demonstrating consistency with regional plans and policies

Mitigation measures included in the Draft PEIR are consistent with the applicable mitigation measures in the RTP, including the following:

- Draft PEIR MM 3.1-1 through MM 3.1-3 are consistent with RTP MM-AV.1 through MM-AV.10, as applicable.
- Draft PEIR MM 3.2-1 through MM 3.2-7 are consistent with RTP MM-BIO.1 through MM-BIO.45, as applicable.
- Draft PEIR MM 3.3-1 through MM 3.3-5 are consistent with RTP MM-W.1 through MM-W.36.
- Draft PEIR MM 3.4-1 and MM 3.4-2 are consistent with RTP MM-CUL.1 through MM-CUL.17, as applicable.
- Draft PEIR MM 3.5-1 through MM 3.5-3 are consistent with RTP MM-HM.1 through MM-HM.6.
- Draft PEIR MM 3.6-1 through MM 3.6-3 are consistent with RTP MM-TR.1 through MM-TR.6.
- Draft PEIR MM 3.7-1 through MM 3.7-3 are consistent with RTP MM-AQ.1 through MM-AQ.18, as applicable.

Response to Comment H-2

Stating that SCAG staff could not determine whether the Draft PEIR population, household, and employment analyses were based on the 2008 RTP Regional Growth Forecasts

During the Initial Study for the Bicycle Master Plan, the project was found to have less-than-significant impacts related to population, housing, and employment. The Bicycle Master Plan would have minimal effects on population, housing, and employment. Therefore, the Draft PEIR did not cover these topics.

Response to Comment H-3

Stating that SCAG staff finds the proposed project partially consistent with the RTP Goals

The comment states that the project is only partially consistent with RTP G5 because the project construction has the potential to negatively impact air quality through the use of onsite construction equipment and emissions.

During the Initial Study for the Bicycle Master Plan, it was determined that there was a potential for the project to result in cumulatively considerable net increase of criteria pollutants, including ozone

precursors. In the Draft PEIR, the air quality analysis determined that construction-related daily emissions would not exceed the regional significance thresholds for either the South Coast Air Quality Management District or the Antelope Valley Air Quality Management District (see Tables 3.7-6 and 3.7-7 in the Draft PEIR). The analysis also showed that construction would result in less-than-significant localized impacts using the most conservative estimates of onsite mass emissions (see Tables 3.7-6 and 3.7-7). For the potential to generate greenhouse gas (GHG) emissions, the analysis took a conservative approach in the absence of any County-adopted plans or programs requiring GHG emission reductions and found that the project's limited emissions would represent potentially significant contributions to cumulative GHG emissions. Mitigation measures were included in the Draft PEIR to reduce these impacts to a less-than-significant level.

Note that the long-term air quality and GHG emissions impacts (after construction) would be beneficial to the extent that people would be encouraged to use alternative, non-polluting transportation, as discussed in Section 3.7 of the Draft PEIR, "Air Quality/Greenhouse Gas Emissions."

Response to Comment H-4

Stating that SCAG staff finds the proposed project partially consistent with Compass Growth Visioning [GV] Principle 1, "improve mobility for all residents"

The comment states that the project is consistent with the applicable portions of the GV principles, but that SCAG staff cannot determine consistency with GV P1.3, "encourage transit-oriented development," based on the information provided in the Draft PEIR.

The Bicycle Master Plan is not a transit project or a development project. Nothing in the project either encourages or discourages transit-oriented development. Transit-oriented development is outside the scope of the Bicycle Master Plan but will be addressed in the General Plan Update currently being prepared by the County. The policy is therefore not applicable to the Bicycle Master Plan.

Response to Comment H-5

Stating that SCAG staff finds the proposed project partially consistent with GV Principle 2, "foster livability in all communities"

The comment states SCAG staff cannot determine consistency with GV P2.1, "promote infill development and redevelopment to revitalize existing communities," or with GV P2.2, "promote development that provides a mix of uses," based on the information provided in the Draft PEIR.

The Bicycle Master Plan is not an infill, redevelopment, or mixed-use development project. It neither encourages nor discourages such development. The policy is therefore not applicable to the Bicycle Master Plan.

Response to Comment H-6

Stating that SCAG staff finds the proposed project partially consistent with GV Principle 3, "enable prosperity for all people"

The comment states that, based on the information provided in the Draft PEIR, SCAG staff cannot determine consistency with GV P3.3, "ensure environmental justice regardless of race, ethnicity, or income class"; GV P3.4, "support local and state fiscal policies that encourage balanced growth"; or GV P3.5, "encourage civic engagement."

Regarding environmental justice, the project does not favor or disfavor any race or ethnicity. However, by providing the opportunity for people to use a lower-cost form of transportation, it would have a beneficial effect on low-income populations.

Regarding balanced growth, the project is not a development project. As stated in Chapter 6 of the Draft PEIR, "Growth Inducement," approval of the Bicycle Master Plan would not result in significant inducement of economic or population growth.

Regarding civic engagement, the planning efforts associated with the Bicycle Master Plan, as well as the scoping meetings and public hearing for the PEIR, provided opportunities for the citizens of Los Angeles County to engage in the planning and environmental process.

Response to Comment H-7

Stating that SCAG staff finds the proposed project partially consistent with GV Principle 4, "promote sustainability for future generations"

The comment states that, based on the information provided in the Draft PEIR, SCAG staff cannot determine consistency with GV P4.1, "preserve rural, agricultural, recreational, and environmentally sensitive areas."

During the Initial Study for the Bicycle Master Plan, it was determined that there would be less-than-significant impacts to agriculture because the project would not affect agricultural uses. The Initial Study also determined that impacts to recreation would be either less than significant or beneficial, in that the project would provide additional recreational opportunities.

In Section 3.2 of the Draft PEIR, "Biological Resources," the potential for significant impacts to Los Angeles County Significant Ecological Areas (SEAs), SEA buffers, and coastal Environmentally Sensitive Habitat Areas (ESHAs) was identified. Mitigation was included in the Draft PEIR to reduce these impacts to less than significant.

Response to Comment H-8

Requesting that all feasible measures to mitigate negative regional impacts associated with the project be implemented and monitored, as required by CEQA, and encouraging the use of SCAG's List of Mitigation Measures

The Draft PEIR included mitigation measures to reduce all significant impacts to a less-than-significant level. A Mitigation Monitoring and Reporting Program has been prepared for approval by the Los Angeles County Board of Supervisors prior to certification of the PEIR.

See response to Comment H-1 regarding SCAG's List of Mitigation Measures.

December 16, 2011

Guille Aguilar
City of Pico Rivera
6615 Passons Boulevard
Pico Rivera, CA 90660

Subject: County of Los Angeles Bicycle Master Plan
Final Program Environmental Impact Report (PEIR)
Response to Comments

Dear Ms. Aguilar:

Thank you for your recent comments on the County of Los Angeles Bicycle Master Plan Draft Program Environmental Impact Report (PEIR) (your comment card from the public meeting held on September 15, 2011). On behalf of the County of Los Angeles Department of Public Works, ICF is providing your agency with written proposed responses to your comments at least 10 days prior to certification of the PEIR (CEQA Guidelines §15088(b)). Please find attached your comment letter and the proposed responses.

The Regional Planning Commission for the County of Los Angeles is scheduled to take action on the adoption of the Bicycle Master Plan, including a recommendation on the certification of the PEIR, at its regular meeting on January 12, 2012. The Bicycle Master Plan approval and EIR certification will then be considered by the County of Los Angeles Board of Supervisors in March 2012.

Thank you for your interest in the County of Los Angeles Bicycle Master Plan PEIR.

Sincerely,

Donna McCormick, AICP
Project Manager

Attachment

City of Pico Rivera Comment Letter and Response to Comments

cc: Reyna Soriano, County of Los Angeles Department of Public Works

County of Los Angeles Bicycle Master Plan Draft Program EIR

Comment Card

Please use this space to comment on the County of Los Angeles Bicycle Master Plan Draft Program EIR.

J-1

- when will the county provide a response to written comments? (comment submitted via mail from the City of Pico Rivera)

Commenter J

Name: Guille Aguilar *E-mail:* gaguilar@pico-rivera.org

Address: 6615 Passons Blvd., Pico Rivera, CA 90660

RENEW LOS ANGELES COUNTY
Made possible by funding from the Department of Health and Human Services through the Los Angeles County Department of Public Health.

Response to Comment J-1

Requesting information about when the City can expect a response to their written comments

As required by CEQA Guidelines Section 15088(b), the County is required to provide a copy of response to any public agency comments at least 10 days prior to certification of the Final PEIR.

December 16, 2011

Bret Banks, Operations Manager
Antelope Valley Air Quality Management District
43301 Division Street, Suite 206
Lancaster, CA 93535-4649

Subject: County of Los Angeles Bicycle Master Plan
Final Program Environmental Impact Report (PEIR)
Response to Comments

Dear Mr. Banks:

Thank you for your recent comments on the County of Los Angeles Bicycle Master Plan Draft Program Environmental Impact Report (PEIR) (your letter dated October 17, 2011). On behalf of the County of Los Angeles Department of Public Works, ICF is providing your agency with written proposed responses to your comments at least 10 days prior to certification of the PEIR (CEQA Guidelines §15088(b)). Please find attached your comment letter and the proposed responses.

The Regional Planning Commission for the County of Los Angeles is scheduled to take action on the adoption of the Bicycle Master Plan, including a recommendation on the certification of the PEIR, at its regular meeting on January 12, 2012. The Bicycle Master Plan approval and EIR certification will then be considered by the County of Los Angeles Board of Supervisors in March 2012.

Thank you for your interest in the County of Los Angeles Bicycle Master Plan PEIR.

Sincerely,

Donna McCormick, AICP
Project Manager

Attachment
Antelope Valley Air Quality Management District Comment Letter and Response to Comments

cc: Reyna Soriano, County of Los Angeles Department of Public Works

Commenter K

Antelope Valley Air Quality Management District
43301 Division St., Suite 206
Lancaster, CA 93535-4649

661.723.8070
Fax 661.723.3450

Eldon Heaston, Executive Director

October 17, 2011

Mr. Abu Yusuf
County Bicycle Coordinator
900 South Fremont Avenue 11th Floor
Alhambra, CA 91803

Project Description: Bicycle Master Plan (Project No. R2011-00874)

Mr. Yusuf,

The Antelope Valley Air Quality Management District (District) has reviewed the draft EIR document proposing the County of Los Angeles Bicycle Master Plan that would be a component of the Transportation Element of the General Plan, which is a long-range policy document that guides growth and development in the unincorporated portion of Los Angeles County. When the 2035 Los Angeles County General Plan Update is approved, the Bicycle Master Plan will be incorporated as a component of the Mobility Element. The Bicycle Master Plan includes recommendations for an expanded bikeway network in unincorporated communities and along rivers, creeks, and flood control facilities throughout the County.

Based on our review of the draft EIR, the District requests that the County of Los Angeles require the project manager/point-of-contact to submit a Fugitive Dust Emission Control Plan and his/her contact information prior to the start of the project. K-1

Thank you for the opportunity to review this planning document. If you have any questions regarding this letter, please contact me at (661) 723-8070 ext. 2 or Julie McKeehan at ext. 8.

Sincerely,

for **Bret Banks**
Operations Manager

BB/jm

Bicycle Master Plan.doc

Clean Cities Antelope Valley

Response to Comment K-1

Requesting submission of Fugitive Dust Emission Control Plan prior to start of project.

As discussed in Section 3.7 of the Draft PEIR, "Air Quality/Greenhouse Gas Emissions," during construction the projects proposed under the Bicycle Masters Plan would comply with each air quality management district's fugitive dust control rules. Therefore, impacts related to fugitive dust would be less than significant. (See Impact 3.7-3, Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under applicable federal or state ambient air quality standards [including releasing emissions which exceed quantitative thresholds for ozone precursors].)

December 16, 2011

Leroy D. Baca, Sheriff
Gary T. K. Tse, Director
County of Los Angeles Sheriff's Department Headquarters
Facilities Planning Bureau
Pico Rivera, CA 90660

Subject: County of Los Angeles Bicycle Master Plan
Final Program Environmental Impact Report (PEIR)
Response to Comments

Dear Mr. Baca and Mr. Tse:

Thank you for your recent comments on the County of Los Angeles Bicycle Master Plan Draft Program Environmental Impact Report (PEIR) (your letter dated November 1, 2011). On behalf of the County of Los Angeles Department of Public Works, ICF is providing your agency with written proposed responses to your comments at least 10 days prior to certification of the PEIR (CEQA Guidelines §15088(b)). Please find attached your comment letter and the proposed responses.

The Regional Planning Commission for the County of Los Angeles is scheduled to take action on the adoption of the Bicycle Master Plan, including a recommendation on the certification of the PEIR, at its regular meeting on January 12, 2012. The Bicycle Master Plan approval and EIR certification will then be considered by the County of Los Angeles Board of Supervisors in March 2012.

Thank you for your interest in the County of Los Angeles Bicycle Master Plan PEIR.

Sincerely,

Donna McCormick, AICP
Project Manager

Attachment

County of Los Angeles Sheriff's Department Headquarters Comment Letter and Response to Comments

cc: Reyna Soriano, County of Los Angeles Department of Public Works

Commenter M

County of Los Angeles
Sheriff's Department Headquarters
4700 Ramona Boulevard
Monterey Park, California 91754-2169

Leroy D. Baca, Sheriff

November 1, 2011

John Walker, Assistant Deputy Director
Department of Public Works
Programs Development Division
900 South Fremont Avenue, Fifth Floor
Alhambra, California 91803

Attention: Mr. Abu Yusuf, County Bicycle Coordinator

Dear Mr. Yusuf:

REVIEW COMMENTS
DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT
COUNTY OF LOS ANGELES BICYCLE MASTER PLAN
(PROJECT NO. R2011-00874; LASD/FPB PROJECT NO. 11-053)

The Los Angeles County Sheriff's Department (Department) submits the following review comments on the Draft Program Environmental Impact Report (PEIR), dated August 2011, on the County of Los Angeles Bicycle Master Plan (Project). The proposed Project will replace the *Plan of Bikeways* that was adopted in 1975, and provides guidance regarding the development of infrastructure, policies, and programs for expanding the existing bikeway network, connecting gaps, addressing constrained areas, and providing for greater local and regional connectivity. The Draft PEIR identifies significant impacts that may result from implementing the proposed Project. M-1

The proposed Project, as it is described in the Draft PEIR, is not expected to impact the Department's law enforcement resources or operations. The Department has no other comments to submit at this time, but reserves the right to further address this matter in subsequent reviews of the proposed Project.

Thank you for including the Department in the environmental review process. Should you have any questions regarding this matter, please contact Lester Miyoshi, of my staff, at (626) 300-3012, and refer to Facilities Planning Bureau Project No. 11-053. You may also contact Mr. Miyoshi, via e-mail, at Lhmiyosh@lasd.org.

Sincerely,

LEROY D. BACA, SHERIFF

Gary T. K. Tse, Director
Facilities Planning Bureau

A Tradition of Service Since 1850

Response to Comment M-1

Stating that project is not expected to result in impacts on law enforcement resources or operations.

The comment states that the Bicycle Master Plan is not expected to result in impacts on the County Sheriff's Department law enforcement resources or operations and that the department has no other comments at this time. No response is required.