

Attachment D-2

Public Comment Letters

- Comment Number 14
- Comment Number 15
- Comment Number 28

Comment Number 14

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

BY EMAIL

September 18, 2020

RE: SC# 2016121064 Los Angeles Union Station Forecourt & Esplanade Improvements Project, EIR Addendum #2

Ms. Carvajal,

Thank you and your team for your hard work over the years on the Union Station Forecourt & Esplanade Improvements project, and for your exemplary efforts at community outreach throughout the project and its design process.

I am disappointed that the most recent update, EIR Addendum #2, has provided adjustments to the project that cause it to fail to meet its project goals. After years of supporting this project, I write to note that I cannot support the project as presented in this addendum.

As noted in Metro documents, the adopted FEIR for this project includes the following objectives:

- “Prioritize connectivity, convenience, and safety for the most vulnerable users (pedestrians, bicyclists, transit patrons and community stakeholders) to safely navigate to and from the project site.”
- “Advance desirable and accessible public space at the LAUS forecourt that creates a visually porous and permeable connection between Union Station and the surrounding historic and cultural communities.”
- “Facilitate alternatives to driving by providing infrastructure that enables more walking and bicycling.”
- “Enhance the safety and quality of pedestrian and bicycle connections between the station and El Pueblo Historic Monument, Father Serra Park, Olvera Street, and nearby business and neighborhoods.”
- “Advance sustainability by providing for reduced consumptive water use in a cost-effective manner and improving multi-modal facilities that encourage active transportation and reduction in vehicle miles traveled.”

FEIR Addendum #2 proposes the following changes which would directly impact or negate stated project objectives:

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- Elimination of 28 of 54 mature sidewalk sycamore trees providing shade canopy, and relocation of 17 remaining mature sidewalk sycamore trees from a central sidewalk location providing shade cover for pedestrian and bicycle facilities to a property-line adjacent location that significantly reduces shade provisions for pedestrian facilities, and eliminates shade for bicycle facilities (*not documented* as a proposed modification in FEIR Addendum #2 Section 4.2)
- Addition of provision for driver left turns from Los Angeles Street onto Alameda Street across the enhanced pedestrian/bicycle crossing (“Los Angeles Crossing”) from a shared straight & left turn lane (summarized in FEIR Addendum #2 as “Intersection and Roadway Modifications”)
- Adjustments to signal phasing to accommodate driver left turns from Los Angeles Street onto Alameda Street across the enhanced pedestrian/bicycle crossing (“Los Angeles Crossing”) from a shared straight & left turn lane (summarized in FEIR Addendum #2 as “Intersection and Roadway Modifications”)
- Elimination of a flush enhanced pedestrian/bicycle crossing in favor of a non-flush 3” high raised crosswalk (*not documented* as a proposed modification in FEIR Addendum #2 Section 4.2)
- Elimination of a direct path of travel between Union Station and El Pueblo in favor of a non-aligned 37’ wide raised crosswalk (*not documented* as a proposed modification in FEIR Addendum #2 Section 4.2)

Only two of these modifications are summarized in Addendum #2 Section 4.2, and are attributed to direction imposed by the Los Angeles Department of Transportation (LADOT). The inclusion of these five modifications impacts the achievement of aforementioned project objectives, primarily by negatively impacting the resulting “connectivity,” “convenience,” “quality,” “desirability,” and “accessibility” of pedestrian and bicycle facilities.

Metro should fully document proposed modifications, study their impact not only on environmental impacts but also project objectives upon which previous environmental review is based on, and offer alternatives that meet project objectives concerning quality pedestrian and bicycle access. Below are summaries of some impacts that have not been addressed in Addendum #2.

1. Adjustments to Shade Cover:

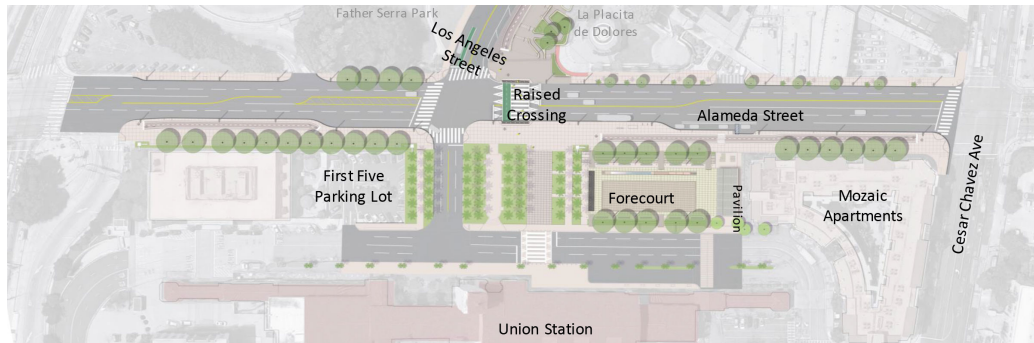
The 2015 Union Station Master Plan (“Transforming Union Station”) presented a vision for the improved pedestrian experience in accessing Union Station from Alameda Street. This plan called for the installation of new double-rows of mature sidewalk trees providing shade cover from midday sun. The plan showed 76 mature sidewalk trees located in double-rows to enhance the pedestrian experience, aesthetics, and usability of these sidewalks on hot days.



Source: *Transforming Union Station, 10/9/2015*

As climate change continues to impact Southern California, Los Angeles residents and visitors are increasingly becoming familiar with 100°+ Fahrenheit days for longer periods and more regularly throughout the year. At these temperatures, it is absolutely critical to provide the relief of shade cover for people not enclosed in air-conditioned vehicles, including pedestrians, bicyclists, and people with disabilities on whom the project is focused.

With adjustments to the proposed roadway configuration of Alameda Street, Metro is now proposing to eliminate 50 of the originally planned 76 Alameda sycamore or similar shade trees (a reduction of 28 from the 54 trees on Alameda referenced in the adopted 2018 FEIR). Additionally, the revised plan shows 17 more trees relocated away from the center of the sidewalk to the edge of the Metro property line. These combined changes in reduction and relocation of shade trees result in a significant reduction in the amount of shade cover provided to pedestrians and bicyclists in accessing Union Station.



Source: *Metro LA Union Station Forecourt and Esplanade Improvements Project Updates, 8/3/2020*

Addendum #2 Section 5.1.1 states, “These elements would not result in any impacts to any trees along Alameda Street that were not already accounted for in the Approved Project. Therefore, the Alameda Esplanade revisions would result in no impacts to aesthetics.” This statement is obviously false in review of Metro’s design presentation, proposal to eliminate double-rows of trees, and provision of only 26 mature shade trees on Alameda in place of 76 as envisioned. Metro must study the aesthetic impact of this large reduction in mature sidewalk trees, study the resulting

changes in temperature along non-shaded areas during heat waves, and provide alternatives to improve aesthetics and sidewalk temperatures for non-vehicular users.

2. Pedestrian Signal Cycle Duration:

Under Addendum #2 Section 4.2.2, Metro states that signal phasing for the intersection would need to be revised to include the new provision for left turns from Los Angeles Street onto Alameda Street at the request of LADOT. LADOT’s explanation – stated as concern over “potential driver non-compliance with the left-turn restriction” – is wholly inadequate, defies logic, and fails to explain what alternatives in the form of signage, physical barriers, or enforcement were considered. Metro should not be designing around the accommodation of illegal driver actions.



Source: Metro LA Union Station Forecourt and Esplanade Improvements Addendum #1, 7/2/2018

Metro does not provide analysis to see what the resulting signal cycles would be. The introduction of a new vehicle phase that accommodates turns from a shared straight & left turn lane across Los Angeles Crossing means that one of two options will be required:

1. The approximately 60 second east/west signal phase will need to be shared by separate vehicle & pedestrian phases; or
2. Turning vehicle drivers will be permitted to conflict with Los Angeles Crossing during a walk/bike phase (not permitted under California code)

In August 2020 community presentations, Metro’s project team has communicated that option #2 will not occur, and that vehicle and pedestrian phases will be separate. Considering that Alameda is a major transportation corridor that is unlikely to be prioritized with less than 60 seconds of an overall 120-second cycle, this will split the

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duration of cross-traffic signals aligned with Los Angeles Street between two separate phases: a vehicle-only phase and a ped/bike phase, where the adopted FEIR design would allow vehicle and pedestrian/bicycle phases to be maximized and run contiguously.

The introduction of conflicting vehicle and pedestrian cycles will cause strain on the signal time provided for each mode. As a result, Metro can expect that LADOT will require the inclusion of pedestrian-activated signals (aka “beg buttons”) and/or ADA minimum crossing durations, which would negatively impact the pedestrian experience in order to minimize vehicle backups in the shared straight/left turn lane. For a location that connects Los Angeles’ primary transit hub with Los Angeles’ original walking street, both of these conditions are wholly unacceptable.

In order to incorporate separate vehicle and pedestrian east/west signals, Metro must provide a study of resulting Los Angeles Street traffic volumes, along according demand for signal duration by vehicles and pedestrians. Any study that shows pedestrian crossing at Los Angeles Crossing as less than 45 seconds, or requiring the use of a push button to activate should be deemed as infeasible and contradictory to the stated objectives of the project.

3. Elimination of Flush Raised Crossing:

Despite not being detailed in Addendum #2, Metro project staff has communicated that the proposed 8” tall flush enhanced sidewalk-like “Los Angeles Crossing” will now be limited to a 3” tall raised crosswalk to abide by standards that LADOT applies to typical projects across the entire city.

The Los Angeles Union Station Forecourt & Alameda Esplanade project was never presented to the public as a typical roadway project, but instead as a forward thinking and innovative approach to meet the unique needs of Los Angeles’ primary transit hub, at a time where determined action is needed to address climate change caused by vehicle uses. The project’s 2017 DEIR acknowledges the need for innovation in this project, stating that, “Achieving [aggressive reductions in greenhouse gas emissions by a] 2050 target will require innovation and unprecedented advancements in energy demand.”

The Los Angeles Union Station Forecourt & Alameda Esplanade project is to be Phase 1 in implementation of the 2015 Connect US Action Plan. This plan provides a rendering of the flush, enhanced pedestrian crossing to be provided at Alameda Street. Metro continuously used this rendering in 2017, 2018, and 2019 outreach efforts to the public.



EXISTING View from Union Station west up Los Angeles St. to El Pueblo



PROPOSED Los Angeles Crossing will have an enlarged/raised crosswalk and direct walk-bike path between Union Station and the Plaza at El Pueblo

Source: *Connect US Action Plan*, 10/5/2015

A 3" tall raised crosswalk does not meet the accessibility, aesthetic, or safety goals that are achieved by an 8" tall flush crossing. This feature represents a key element of the project. To eliminate it is a downgrade that has significant impacts on the achievement of project objectives. If non-innovative standards are to be applied to this feature within an innovative project, Metro must study and propose alternatives that will meet the accessibility, quality of pedestrian experience, desirability, and enhanced safety aspects of the project's stated objectives.

4. Elimination of Direct Path of Travel between Union Station and El Pueblo:

Providing a direct pedestrian connection between Union Station and El Pueblo was a primary goal documented in the Connect US Action Plan, which proposed a "direct walk-bike path between Union Station and the Plaza at El Pueblo." This proposal was incorporated into the Los Angeles Union Station Forecourt & Alameda Esplanade project through its objectives at providing direct pedestrian and visual connections between Union Station and El Pueblo. El Pueblo is one of Los Angeles' most important cultural monuments, and one of few focused on the indigenous and Latinx heritage of Los Angeles.

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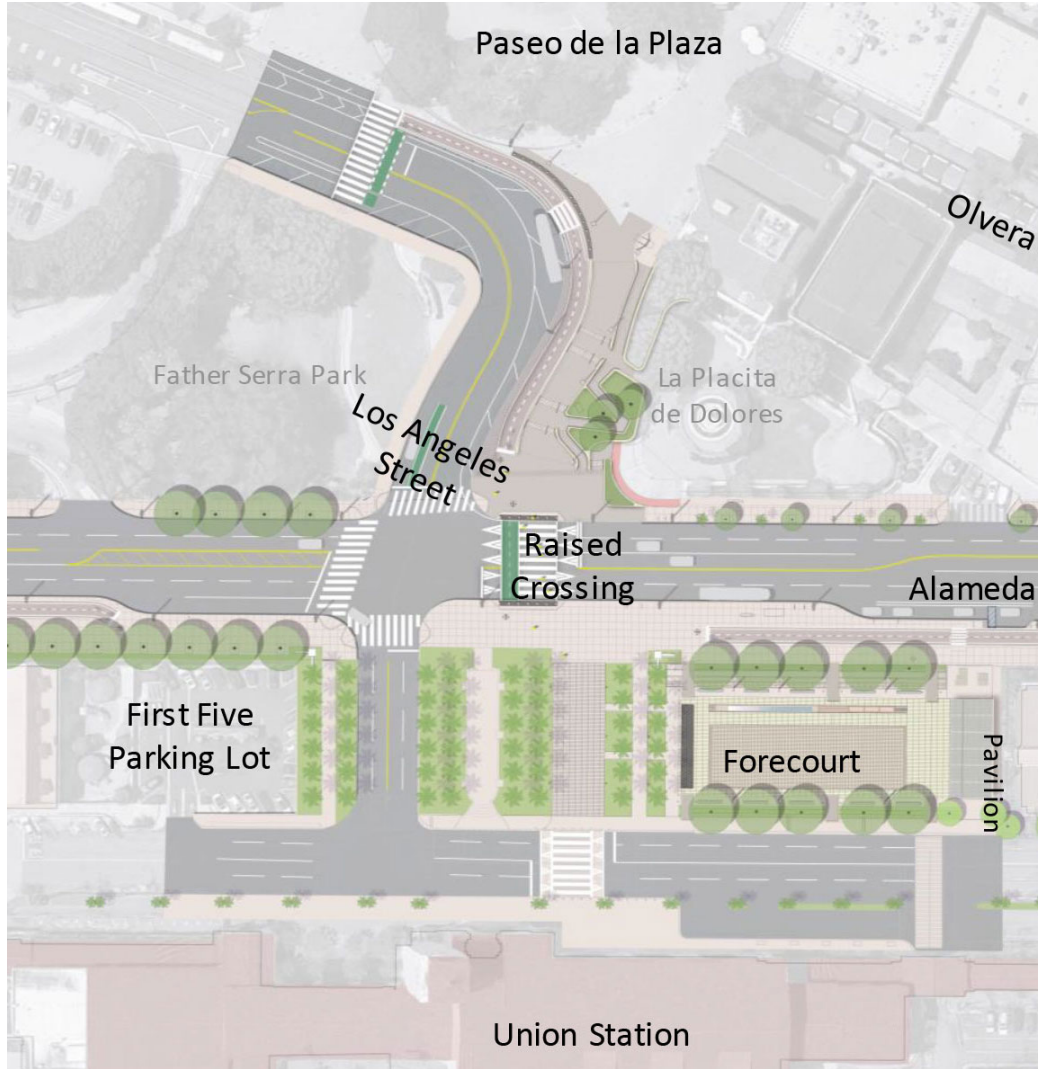


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| <ul style="list-style-type: none"> 1 Close part of Los Angeles St. to create an enlarged walkway to the Plaza 2 Provide wide crosswalk at sidewalk level 3 Retain two-way traffic on Los Angeles St. 4 Provide access to front door of Union Station per the Union Station Master Plan | <ul style="list-style-type: none"> 5 Provide new crosswalk 6 See Alameda Esplanade 7 See Los Angeles Street Esplanade 8 Walk path to Paseo Luis Olivares and Chinatown from El Pueblo 9 See North Main Streetscape 10 Walk path to La Placita, Los Angeles Plaza de Cultura y Artes and Ft. Moore | <ul style="list-style-type: none"> 11 Tour bus parking 12 Paseo Luis Olivares 13 Paseo de La Plaza <p>Note: Dashed purple lines denote paths that will require bicyclists to walk their bike due to a higher level of pedestrian activity.</p> |
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Source: *Connect US Action Plan*, 10/5/2015

Despite not being detailed in Addendum #2, Metro project staff has communicated that the proposed Los Angeles Crossing will be reduced from 50 feet in width to 37 feet in width based on feedback from LADOT. A review of this reduction in pedestrian area is not provided, but it is clear from the revised design plan presented in August 2020 that the result is a misalignment off the intended direct connection. This causes a meandering path of travel for pedestrians, negatively impacting the achievement of objectives concerning accessibility, quality of pedestrian experience, and project aesthetics. The presented plan with a reduced crossing shows that the ADA-accessible ramp does not align with the raised crossing. This non-alignment with the accessible route would treat people with disabilities as separate and secondary; it does not abide by the provisions of Federal ADA or California Accessibility Code.



Source: Metro LA Union Station Forecourt and Esplanade Improvements Project Updates, 8/3/2020

No justification has been provided to merit this unnecessary reduction in quality of pedestrian access and in meeting project objectives for direct connection, but it presumably is being requested to increase vehicular capacity on Alameda Street. While vehicular capacity is not an objective of the project, a direct connection between Union Station and El Pueblo is. Metro should expand the width of the enhanced crossing to align with both the accessible route to El Pueblo and the entrance to Union Station.

5. Stormwater Runoff:

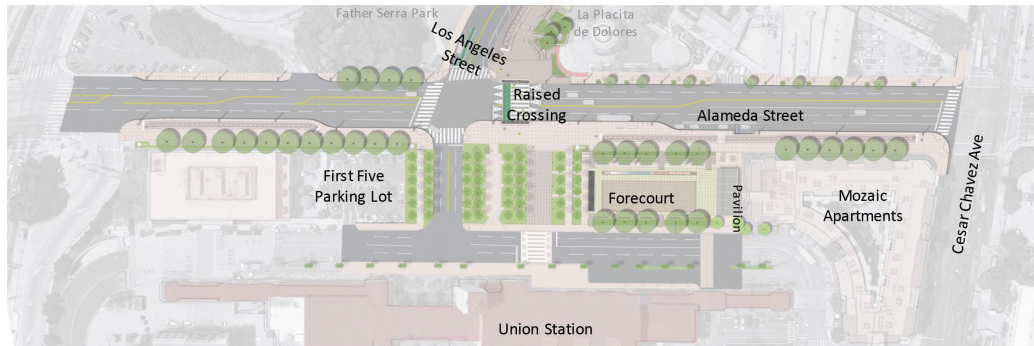
Addendum #2 Section 5.10 "Hydrology and Water Quality" provides no study to support its statement that a reduction in the number of mature trees and permeable surface area of landscaping has "No Impact" to stormwater runoff from the project scope adopted in the 2018 FEIR. If Metro seeks to eliminate 52% of mature sidewalk trees (28 of 54), Metro should provide a stormwater runoff study to justify that the

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elimination of trees from the adopted FEIR has no impact to water systems and/or quantify the adjustment for public review.

6. Discontinuous Alameda Cycle Path:

With the adoption of the FEIR for this project, Metro had accommodated an LADOT request for the addition of a right turn pocket on the east side of Alameda to improve vehicular level of service on Alameda and provide a dedicated turn signal for drivers turning right into Union Station. While it was not clear at that time, it is clear now from updated design documents that this accommodation results in discontinuous strips of bike facilities on Alameda. Without providing connection between these strips and to adjacent bicycle infrastructure, these cycle paths are functionally useless and wholly unattractive to people intending to navigate the area by bicycle. Metro should not prioritize driving access to Union Station over the inclusion of functional bicycle facilities. Now that design documents have shown these cycle paths as unworkable, Metro should provide redesign to meet project goals of improved and prioritized bicycle access and consider engagement with LADOT's Livable Streets team to ensure conformance with bicycle facility design best practices and continuity with a citywide bike network.



Source: Metro LA Union Station Forecourt and Esplanade Improvements Project Updates, 8/3/2020

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Conclusion:

As a user in the area who regularly relies on pedestrian and bicycle travel, I have followed this project closely, offering my formal support for the project to Caltrans Division of Local Assistance and District 7 in 2019. I unfortunately am not able to support the project as presented in Addendum #2 and as communicated by Metro staff in August 2020, and must oppose this addendum.

I thank you in advance for your consideration. I ask that Metro reconvene with city of Los Angeles department leadership and elected representatives of the public to work through concerns, study impacts and alternatives, and work to ensure that the project can be modified to meet its stated goals.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael MacDonald", with a long horizontal flourish extending to the right.

Michael MacDonald
Architect, NCARB, LEED AP BD+C

cc: Sharon Tso, Council District 14 caretaker
Katie Kiefer, Office of Council District 14
Sarah Flaherty, Office of Councilmember-elect Kevin de León
Jennifer Barraza, Office of Councilmember-elect Kevin de León
Dan Rodman, Office of Mayor Eric Garcetti
Julia Salinas, Office of Mayor Eric Garcetti
Nate Hayward, Los Angeles Department of Transportation
Megan Nangle, Metro Transportation Planning Manager



August 20, 2020

Via Email

Re: LA Union Station Forecourt and Esplanade Improvements - FEIR Addendum 2

Dear Chair Garcetti,

Central City Association represents a coalition of businesses, nonprofits and trade associations with a shared commitment to the vibrancy of Downtown Los Angeles (DTLA) and increasing investment in the region more broadly. A key component of this vision is an accessible, walkable and welcoming experience for residents, visitors and workers travelling from near and far.

As defined in the 2018 Final EIR (FEIR), the Metro LA Union Station (LAUS) Forecourt and Esplanade Improvements project will improve the DTLA experience by prioritizing connectivity, convenience and safety; increasing desirable public space; and facilitating alternatives to driving by providing infrastructure that enables more walking and bicycling. The project's identified priorities also advance economic development, public health and sustainability goals in the City of Los Angeles.

While the approved project advances these goals and priorities, we are concerned that certain proposed modifications run counter to the project's stated priorities as well as Metro's Vision 2028 and the City of Los Angeles' Vision Zero policy. We ask you to reconsider the following aspects of Addendum 2 and move forward with the existing provisions outlined in the Board approved 2018 FEIR.

Left-Turn Access to Alameda Street

Addendum 2 proposes keeping the existing eastbound Los Angeles Street left-turn lane to northbound Alameda Street out of concern that drivers would not comply with the no left-turn signaling and make illegal left turns at the intersection. The approved project proposed removing this lane to eliminate a movement that would conflict with the raised crosswalk and would create a traffic queue along Los Angeles Street for those waiting to turn left.

We cannot plan projects nor design streets around the possibility that drivers will not comply with the rules of the road. Drivers, like pedestrians and cyclists, must be responsible for following the City's rules and regulations. Keeping the existing left-turn lane puts people driving and people walking at odds. If this turn lane remains, pedestrians using the raised crossing would have a shortened amount of time to cross Alameda Street while navigating the threat of cars turning left into the crossing. This dynamic creates a dangerous and uncomfortable experience for pedestrians. This pathway is a direct connection between LAUS, the region's transportation hub, and the highly walkable El Pueblo District. Pedestrians should feel safe and welcomed as they move to and from these landmark locations without threat from drivers turning left. **We request that the existing eastbound Los Angeles Street left-turn lane be eliminated as designated in the approved project.**

Pedestrian-Supportive Infrastructure

As defined in the 2018 FEIR, the pedestrian and cyclist crossing on Alameda Street would be a 50-foot-wide raised crossing that connects the LAUS Forecourt and Esplanade to the Los Angeles Street pathway and the El Pueblo District. We are concerned that the modified project reduces the width of the crossing to 37 feet and lowers the platform height to three inches. These design changes again prioritize cars over

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other transportation modes by reducing crossing space for pedestrians and cyclists while expanding street space for cars to queue and move more quickly over the crossing.

Changes to the crossing combined with reduction in the number of mature trees that provide much-needed shade to those on foot, bikes and scooters would again erode the project's intent of providing a great public space and encouraging active transportation alternatives. **We request that the designs to the crossing remain consistent with the approved project and that every effort to provide additional tree canopy be made.**

The LAUS Forecourt and Esplanade Improvements project has undergone extensive study and community outreach. Successful implementation that reflects the priorities of this project will lead to a transformative public space that encourages active transportation and alternatives to single-occupancy vehicles while celebrating Los Angeles' surrounding historical landmarks. We thank you for your consideration and ask you not to accept modifications that fall short of meeting this project's intended outcomes.

Sincerely,

A handwritten signature in blue ink, appearing to read "J Lall".

Jessica Lall
President & CEO
Central City Association of Los Angeles

cc: Councilmember-elect Kevin de León
Supervisor Hilda Solis
Commissioner Teresa Villegas, Board of Public Works



Los Angeles County Bicycle Coalition

213.629.2142
www.la-bike.org

August 25, 2020

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

SUBJECT: Union Station Forecourt and Alameda Esplanade Project Changes

Dear Ms. Carvajal,

The Los Angeles County Bicycle Coalition (LACBC) is concerned by the latest design sketches proposed of the planned changes to the Union Station Forecourt and Alameda Esplanade project. The project itself is a tremendous opportunity for Metro and the City of Los Angeles to partner on their commitment to making a key transportation, cultural, and historical hub for the region more mobility and pedestrian friendly, but the most recent changes seem to be a step backwards from many of the stated goals laid out for the project.

LACBC is excited that a number of proposed changes, such as the dual-direction sidewalk-level bike lane along Los Angeles St, but these elements on their own do not create an inviting enough environment to encourage more people to consider alternative transportation options to and from Union Station. For example, the current design calls for the elevated crosswalk, which would have previously been a 50-foot wide speed mitigating 8-inch elevated table, to be reduced to an insufficient 37-foot wide, 3-inch grading that not only does little for speed reduction and pedestrian visibility, but also creates a nuisance to drivers. This design flaw fails to serve the needs of every modality. If the main interest is in slowing down traffic along Alameda to ensure a safe crossing at this critical intersection, then the original design meets the stated goals of "prioritiz[ing] connectivity, convenience, and safety for the most vulnerable users (pedestrians, bicyclists, transit patrons and community stakeholders) to safely navigate to and from the project site."

Another change in the recent design that is counter to the intent of the project is the reduction in shade trees along Alameda Street. It is our understanding that this decision was made due to cost constraints around reconfigurations to existing pipes. However, the new design does not address the impact that a lack of shade in the area poses to pedestrians and shared-mobility as well as personal mobility users navigating the area. If the city is unable to incorporate additional trees, then additional shade structures should be considered in order to increase the comfort for all community members using the space. The lack of shade in Southern California's average of 284 days of sunshine makes the latest changes less effective at meeting the stated goal of "Facilitat[ing] alternatives to driving by providing infrastructure that enables more walking and bicycling."

Finally, the proposed changes result in a disjointed and potentially unsafe bike path along the Alameda Esplanade that greatly increases the potentially dangerous mixing of pedestrians, cyclists, and cars at the intersection. The current design shows the dedicated bi-directional bike lane on the East side of Alameda St cutting off quite some distance from the intersection in order to accommodate a right turn late for motor vehicle traffic on the South side of the intersection. This design forces cyclists to intermingle with other traffic while still on the sidewalk, creating a dangerous mix of pedestrians and cyclists as well as creating

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opportunities for cars to fail to see cyclists on the sidewalk. This design fails to meet the stated goal of "Prioritiz[ing] connectivity, convenience, and safety for the most vulnerable users (pedestrians, bicyclists, transit patrons and community stakeholders) to safely navigate to and from the project site." We strongly encourage Metro and the City of LA to reexamine the design of this location in order to reduce the potential for dangerous collisions. If this intersection itself cannot be reconfigured, then we ask that right turns on red not be allowed and that the signal timing be adjusted to allow for safe bike/mobility/pedestrian crossing that does not create conflict with motor vehicle traffic.

LACBC raises these issues in an effort to encourage Metro to work with the City of Los Angeles to find more creative and innovative solutions to improve the conditions for walking and biking at the heart of one of the regions most historically and culturally significant sites. We understand that there are many considerations that go into these kinds of projects, but must stand by our conviction that if Metro and the City of Los Angeles prioritized the movement of people over the movement of cars, we could all work together to transform Los Angeles into a region that is celebrated as among the most livable and accessible in the world.

Sincerely,

A handwritten signature in black ink, appearing to read 'E.A. Kaufman', with a long horizontal flourish extending to the right.

Eli Akira Kaufman
Executive Director
Los Angeles County Bicycle Coalition