Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

Richard J. Bruckner
Director

January 5, 2012

TO: Curt Pedersen, Chair
David W. Louie, Vice Chair
Esther L. Valadez, Commissioner
Harold V. Helsley, Commissioner
Pat Modugno, Commissioner

FROM: Connie Chung, AICP, Section Head
General Plan Development / Housing

SUBJECT: ITEM #6: BICYCLE MASTER PLAN UPDATE; PROJECT NO. R2011-00874-(1-5)

At your meeting on January 11, 2012, the Department of Public Works will be giving a presentation on the Bicycle Master Plan Update. Attached are public comments received after December 28, 2011.

JS:CC:AR

cc: Richard J. Bruckner

Attachments:
1. Additional Public Comments (received after December 28, 2011)

320 West Temple Street ▪ Los Angeles, CA 90012 ▪ 213-974-6411 ▪ Fax: 213-626-0434 ▪ TDD: 213-617-2292

CITY OF INDUSTRY

Incorporated June 18, 1957

January 3, 2012

Planning Commissioners
Department of Regional Planning
320 West Temple St., 13th Floor
Los Angeles, CA 90012

RECEIVED
JAN - 4 2012

Abu Yusuf
County Bikeway Coordinator
900 S. Fremont Ave., 11th Flr.
Alhambra, CA 91803

Dear Planning Commissioners:

The City of Industry requests that the Commission address our concerns about the Bicycle Master Plan and Los Angeles County Bicycle Master Plan Draft Program Environmental Impact Report (EIR) as expressed in the attached letters. While the City supports bicycle mobility, due to our unique nature we want to make sure the proposed bike routes: 1) are safe, 2) do not reduce traffic capacity, 3) do not interfere with truck traffic, and 4) are feasible. Based upon the details provided in the Master Plan, EIR, and responses to comments, none of these concerns have been addressed.

First, the Planning Commission should be aware the City was not consulted, notified, or invited to participate in project scoping sessions when the master plan was being developed, which should be part of a normal due diligence process. The routes selected in the City of Industry are already at their ultimate widths and cannot accommodate bike lanes without eliminating traffic lanes or expanding the rights-of-way. This is why the City has requested that the selected routes be dropped from the master plan and, if the project description does not change, that the EIR examine the resulting impacts to land use and Level of Service (LOS).

Secondly, the EIR is inadequate in that it fails to analyze these environmental impacts noted above. Of particular concern is Response to Comment # F1, in which the commenter states, "The comment does not provide any evidence for LOS impacts." A similar stance is taken in Response to Comments F-3 and F-6 in which the commenter fails to address environmental issues related to safety, land use, and security.

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It is the obligation of the EIR and project proponent to study the potential impacts of the proposed project (CEQA Guidelines, Section 15088). In addition, in the event that the proposed bike lanes in the City of Industry are not feasible, the EIR fails to analyze the resulting impacts to the countywide bicycle system.

The City of Industry respectfully requests that the Planning Commission ensure that the Bicycle Master Plan and EIR address our concerns as expressed in the attached letters and as raised herein. Thank you for your consideration and please feel free to contact me should you have any questions.

Sincerely,

John Ballas
City Engineer

JDB:BJ/mk

Enclosures

Cc: Ms. Reyna Soriano

DEC 19 2011

ICF INTERNATIONAL

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

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

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.

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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

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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

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.