August 15, 2019

Via Email: Scott Hartwell, Metro Project Manager
& Metro Board Secretary Michele Jackson

Re: North Hollywood to Pasadena Bus Rapid Transit Corridor Project

Dear Mr. Hartwell and the Metro Board of Directors,

Metro is currently in the early stages of the environmental review process to determine the direction for the North Hollywood to Pasadena Bus Rapid Transit Corridor Project (Noho-Pas BRT). This project seeks to provide improved transit service to transit riders and to the communities of North Hollywood, Burbank, Glendale, Northeast Los Angeles, and Pasadena through a new bus rapid transit service linking these areas. Our undersigned groups write to express our support for the goals of this project, and specifically for the Refined Street-Running Alternative (ES Figure 7) presented in Metro’s Alternatives Analysis Report.

Metro’s Refined Street-Running Alternative provides more direct connections to jobs, education, businesses, and destinations for people who ride transit; connections to local bus and regional rail service; and service to the Eagle Rock community by way of stations on Colorado Boulevard. Accordingly, Metro’s analysis shows that a street-running alignment provides 28% higher ridership relative to a Freeway-Running Alternative, and 14% higher ridership relative to a Hybrid Street/Freeway-Running Alternative. Further, Colorado Boulevard in Eagle Rock is designated as a “Comprehensive Transit Enhanced Street” in the City of Los Angeles’ adopted Mobility Plan 2035—an element of the City of Los Angeles’ General Plan—a reorientation of Colorado Boulevard towards a more transit-centered street that the City of Los Angeles can and should work to achieve through this project.

Providing quality transit service that serves jobs and destinations is an issue of equity. As such, we write to express our support for this proposed on-street alignment that promotes the greatest utility for, and use by transit riders. Our organizations support providing BRT service on
dedicated bus lanes, including on Colorado Boulevard in Eagle Rock. People who ride transit should not be forced to take time-consuming detours away from destinations, walk or roll long distances to make transit connections, or to suffer air and noise pollution while waiting for transit on and/or next to freeways. In addition, the Eagle Rock community worked with the City of Los Angeles Planning Department and reduced minimum parking requirements for businesses along Colorado Boulevard, in order to ensure a walkable business district with active business activity. Adding BRT to this corridor is a logical next step to deliver more customers and employees to Colorado Boulevard without increasing car traffic.

Below are the priority issues that we would like to see addressed as the project moves into the Draft Environmental Impact Report phase:

1. Set as a primary goal faster and more efficient transit service for transit users to and from destinations along the route, focusing on travel times along the route (rather than end-to-end service times), service headways, and transfer opportunities for riders to access the greater Metro network.

2. Provide resources and assistance to protect residents and businesses from displacement as a result of the project, and to support vulnerable small businesses through the construction phase. Add the project to Metro’s existing small business interruption fund (BIF) and allocate Transit Oriented Development (TOD) planning resources to leverage BRT investment for equitable community planning.

3. Design for accessible and comfortable transit stops, including shade cover for riders, elevated platforms for quick and efficient boardings for all users inclusive of those with disabilities, strollers, and bikes. Provide safe and comfortable first mile/last mile connections for people on foot, people in wheelchairs, people transferring from other transit lines, and people on bikes, including bike infrastructure improvements, and day-use bike lockers at stations.

4. As was the case with the Wilshire Rapid bus lanes, prioritize funds for curb to curb repaving and ADA accessible sidewalks with two ramps at each corner on Colorado Boulevard to improve safety for all modes, especially for safer bicycle infrastructure on Colorado.

5. Maintain as much of the Colorado Boulevard medians as possible for tree shade and pedestrian safety for a center-running BRT alternative.

6. Study location opportunities for an Eagle Rock Boulevard-area station—including at Caspar Boulevard—that maximize pedestrian access and reduce pedestrian crosswalk distances, provides a comfortable and approachable station atmosphere, opportunities for engaging landscaping with plentiful tree canopy shade cover, reduce conflicts.
between turning vehicles and buses, and efficient transfers to local bus service on both Colorado Boulevard and Eagle Rock Boulevard.

7. Provide a parking study for critical areas such as central Eagle Rock to determine parking need and use, and to use this data to equitably inform decision-making and use of funds towards vehicle parking provisions. Metro should work to avoid undermining project goals of mode shifts towards transit by subsidizing automobile infrastructure.

8. Provide considerations and suggested mitigation measures to address possible cut-through traffic on streets that are adjacent and parallel to the proposed BRT route. Provide guidance to local jurisdictions in suggested improvements to achieve safer first mile/last mile pedestrian and bike connections for people of all abilities and transportation modes to access to transit stations.

9. As an on-street transit enhancement on Colorado Boulevard in Eagle Rock is set forth in the City of Los Angeles’ Mobility Element, any consideration of alternatives without a bus-only lane on this segment must thoroughly study how Metro and the City of Los Angeles would achieve the objectives and targets set in Mobility Plan 2035.

10. As the City of Los Angeles has officially replaced the Level Of Service (LOS) metric with the Vehicle Miles Traveled (VMT) metric, Metro should obtain direction from the City of Los Angeles on which metric is to be utilized relative to project areas within the City of Los Angeles in preparation of a Draft Environmental Impact Report, with emphasis placed on the which metric meets the adopted goals of the City of Los Angeles and Metro.

Thank you for the opportunity to provide comment on this important project, and for your consideration of these issues,

David Diaz  
Executive Director  
Active SGV

Laura Raymond  
Director  
Alliance for Community Transit - Los Angeles

Bryn Lindblad  
Steering Committee Member  
EnviroMetro

Felicia Garcia  
Steering Committee Chair  
Equitable Eagle Rock

Hilary Norton  
Executive Director  
FAST: Fixing Angelenos Stuck in Traffic

Rudy Espinoza  
Executive Director  
Inclusive Action for the City
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