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September 11, 2014

Tham Nguyen
One Gateway Plaza
Mail Stop 99-22-6
Los Angeles, CA 90012

Re: Comments on Metro's Complete Streets Policy Draft

Dear Ms. Nguyen,

Thank you for the opportunity to comment on the Metro Complete Streets Policy Draft. The SBCCOG strongly agrees with and appreciates Metro's efforts to define a policy that will advance the goal of "complete streets" which serve all users and support environmental sustainability. This is clearly stated in the first sentence of the draft policy which includes this phrase: "Metro has the opportunity to help advance state, regional and local efforts to create a more 'complete' and integrated transportation network that **serves all users and supports environmental sustainability.**" (Emphasis added)

The following comments are offered in order to clarify and complete several elements of the draft.

1. Consistently throughout the draft examples of "users" are limited to bicycle, pedestrian and transit modes. Page 3 names an expanded list that includes public transit users and operators, pedestrians, bicyclists, children, persons with disabilities, seniors, motorists, and movers of commercial goods. Slow speed vehicles (such as Segways, electric bikes, and NEVs) are never mentioned as examples and do not appear anywhere in the draft. Metro's own First/Last Mile Report identifies several slow speed modes, yet so far this awareness is missing from the complete streets draft policy. The SBCCOG believes that streets are not "complete" if slow speed vehicles have not been included in the community of "all users." Additionally, this omission is inconsistent with Metro's own First/Last Mile Report.
2. The draft also frequently refers to "bike lanes." Consistent with our first comment, the SBCCOG requests that the policy document refer to "slow lanes" or "slow speed lanes." A lane devoted entirely to bicycles excludes all other zero emission slow speed options which is inconsistent with both goals of accommodating "all users" and supporting environmental sustainability. Every trip that can be converted from fossil fueled to not fossil fueled, regardless of type of conveyance, should be supported by the complete streets policy. By specifically identifying the slow speed option, Metro will make it possible for cities in the South Bay and elsewhere to obtain funding for building slow lanes.

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2A. Slow speed lane implementation is necessary primarily on streets posted at 40 mph or faster speed limits, since slow speed vehicles are otherwise illegal on these facilities. It can proceed in two stages. The first slow lane on a fast street would accommodate all vehicles subject to a speed limit of 25 mph. Should congestion on that initial slow lane develop, then two slow lanes could be designated – curb lane for speeds 4 mph to 15 mph, and an adjacent lane for speeds 16 mph to 25 mph. The slowest lane could accommodate slow moving pedal bikes and other pedal technologies like tricycles and quad cycles as well as Segways, skate boards and so forth as mentioned in Metro’s First/Last Mile Report. The faster slow speed lane would accommodate fast moving pedal technologies plus neighborhood electric vehicles, electric bikes and potentially an entire family of innovative options whose development would be stimulated by this approach to complete streets. These would be in addition to the sidewalk which is for pedestrians.

3. The draft frequently refers to “active transportation” in several forms including “active transportation programs” and “active transportation agenda”. The SBCCOG supports a healthy life style that includes regular exercise. However we urge Metro to recognize that the top priority of a complete streets policy that supports “environmental sustainability” should be advancing mobility while promoting zero emission modes. Activity in the form of exercise is a co-benefit of walking and pedal technologies, but a co-benefit of any kind should not prioritize investments that will exclude any other zero emission mode.

3A. Implementation requires the most capital in a complete streets program – Item 3.1 in Table 2 Complete Streets Implementation Plan specifically addresses active transportation. This should be broadened to discuss implementation of all zero emission modes. Some estimate of maximum achievable mode share by bicycles should be included in any discussion of active transportation – from an overview of experience in other cities in the United States, we estimate this to be somewhere between 2% and 4% depending on the local conditions.

4. In the discussion of Performance Measures on Page 13, the policy draft essentially asks funding recipients to self-define metrics that address how the complete street project serves each modal category, e.g., walking, cycling and transit. It is essential that Metro specifically add slow speed modes to this section. In addition, SBCCOG urges Metro to propose an overarching set of performance measures (categories of measurement that apply to all recipients regardless of project type) that address the project's contribution to "sustainability." Failing to have a set of sustainability metrics can lead to the following situation: A grantee could satisfy the current requirement by proposing bike counts as a measure of how well the new class II lane serves cyclists. However, if all of the cyclists counted are on a recreational trip, then no internal combustion engine vehicle trips are being replaced. So, in this example, the bike path may be well used without contributing to sustainability. While this is certainly a higher standard to meet, we believe the environmental situation is so critical that every dollar invested by Metro in

making streets complete must result in some reduction of GHG emissions and criteria pollutants and that this must be measured.

5. When discussing SB 743, the draft policy states, “When infill projects are reduced in size, development may be pushed to less transportation-efficient locations, which results in greater total travel” (page 8). While that may be true in some cases, it would not likely be true in the South Bay, and in any case it contradicts the SBCCOG Board adopted land use policy of “Neighborhood Oriented Development” (NOD). Reducing expansion of regional centers and diverting that square footage to neighborhood commercial centers is exactly what is needed in the South Bay. Far from increasing travel demand, NOD has been estimated by consultants in a SCAG Compass project to reduce motor vehicle demand by 30% while increasing walking and access by zero emission slow speed vehicles by the same amount.
6. Item “6.8 in Table 2 Continue Transit Oriented Development Planning Grant to encourage local agencies to accelerate the adoption of local land use regulations that will increase access to transit and improve utilization of public transit by reducing the number of modes of transportation necessary to access regional and local transit” (Page 17). This seems misguided or at least unclear and should be re-stated. Limiting first/last mile options to only transit access is much too narrow a strategic goal. Adding a neighborhood oriented development land use alternative provides a sustainable choice that better serves sub-regional and neighborhood trips, where most of the emissions are occurring. Many of the trips in the South Bay are “too short for transit and too long to walk.” Focusing only on walking and biking ignores the sustainability opportunity provided by smart land use and zero emission neighborhood/slow speed mobility options. One of the goals of complete streets should be to increase the mode options; public transit in particular would benefit from additional first/last mile mode options.

These comments summarize the position of the SBCCOG on complete streets. We believe that it is important that this policy document provide the most comprehensive and inclusive list of options for cities to consider as they adopt their complete streets plans. Implementing local jurisdictions should have the greatest leeway possible under the policy to implement projects, programs and strategies that make sense in their community's context.

Each of these points can be expanded and we will be happy to do so at Metro’s request. Thank you for your consideration.

Sincerely,



James F. Goodhart, SBCCOG Chair
Councilman, Palos Verdes Estates