



SOUTH BAY CITIES
COUNCIL OF GOVERNMENTS

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May 26, 2022

Zoe Unruh
I-405 CMCP Project Manager
LA County Metropolitan Transportation Authority
One Gateway Plaza, MS99-13-1
Los Angeles, CA 90012

Re: SBCCOG Comments on Draft I-405 Comprehensive Multi-Modal Corridor Plan

Dear Ms. Unruh:

The South Bay Cities Council of Governments (SBCCOG) appreciates the opportunity to provide comments on Metro's draft I-405 Comprehensive Multi-Modal Corridor Plan (CMCP). SBCCOG staff have been engaged throughout the process and multiple CMCP stakeholder workshops and direct meetings with the CMCP team.

Since most South Bay trips are local, all local mobility options should be encouraged. The draft CMCP highlights that of the 7.2 million trips that start and end within the I-405 corridor and 80% are less than 5 miles. This data is consistent with travel patterns in the South Bay.

The CMCP also notes that bicycle and pedestrian safety is a critical issue in the corridor and how auto-oriented streets, a lack of connected and protected infrastructure, and high vehicle speeds are main reasons people are not safe when using those modes. In addition to increasing safety through protected lanes, the SBCCOG believes the CMCP should also encourage slower travel modes to use slower neighborhood and collector streets and not necessarily share the road with cars on busy arterials.

South Bay Local Travel Network. The SBCCOG and our local jurisdictions are addressing the hyper-local mobility challenge with the South Bay Local Travel Network (SBLTN). The project will create a more than 200-mile cross-jurisdictional network of low-speed local streets designated for slow speed micro-mobility vehicles that allow individuals a safe route from their neighborhoods to destinations. This project also aims to reduce arterial congestion by converting vehicular traffic on major arterials to local-use vehicles on local streets to link a new network of neighborhood activity centers.

Our SBLTN project includes a wide range of battery-powered micro-mobility devices from e-scooters to e-bikes and ever-emerging neighborhood electric vehicles that could not only meet those same travel needs but also would provide mobility to those who may not be able to walk or bike. The SBLTN also assumes personal mobility devices are personally owned in addition to being available through bike/scooter share services. As a comprehensive multi-modal plan, the CMCP should include the SBLTN in the project list.

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The LTN is listed as a Tier 2B project on the CMPC project list, we feel the project should be a Tier 2A project. We recommend the LTN project should be scored higher in all shovel worthiness categories particularly as it increases mobility & accessibility, increases safety, and facilitates a sustainable mode of travel. The project is also likely replicable through many other areas of the corridor.

CMCP Project List. The SBCCOG appreciates the extensive work done to evaluate the 400+ projects in the CMCP's Appendix B and the subsequent tiering of those projects, particularly in relation to the high bar set in order to be competitive for funding. However, accessing capital to build the projects is only one part of the equation. The SBCCOG has concerns that many Tier 1 transit projects do not account for Metro's current financial constraints, particularly when evaluating for ongoing operations and maintenance costs. If transit service is not both fast and reliable, people travelling the corridor are not likely to use it and therefore make no improvement to the congestion on the I-405. The CMCP tiering process should include an evaluation of the fiscal sustainability of each project's operations and maintenance.

In regard to some specific South Bay projects identified on the project list, the SBCCOG agrees that the Centinela Grade Separation Project, and Inglewood Transit Connector Project should be included as Tier 1 projects as they demonstrate high merits and deliverability. We also recommend that a Green Line Operational Improvements Project be added to Tier 1. This project would bring four South Bay Stations into compliance with Metro design standards by extending Green Line stations to accommodate three-car trains and upgrading traction power stations on the Green and Crenshaw / LAX lines to power three-car trains at six-minute headways.

We encourage Metro staff to make the I-405 CMCP truly comprehensive and multi-modal, while also assessing projects for potential grant applications through real-world operational constraints. The SBCCOG thanks Metro staff for initiating the I-405 CMCP development and for including the multitude of stakeholders in the process. We also appreciate that the I-405 CMCP is considered a living document and we look forward to being part of that process.

Should you have any questions, please feel free to contact SBCCOG Executive Director, Jacki Bacharach, at (310) 371-7222.

Sincerely,

Drew Boyles, SBCCOG Chair
Mayor, City of El Segundo