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August 11, 2022

Zoe Unruh
I-405 CMCP Project Manager
LA County Metropolitan Transportation Authority

Via email to: 405CMCP@Metro.net

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

Dear Ms. Unruh:

The South Bay Cities Council of Governments (SBCCOG) submitted an initial comment letter in May 2022 as Metro was initiating its stakeholder outreach and public comment process for the draft I-405 Comprehensive Multi-Modal Corridor Plan (CMCP). Now that the outreach process is closing, SBCCOG has additional comments on the draft CMCP.

The introductory section should describe in greater detail the different characteristics of the various segments of the I-405 corridor. For example, the South Bay is probably the only segment that has no continuous parallel streets to the freeway.

The SBCCOG is discouraged that the draft continues to be narrowly focused only on bicycles, pedestrians and transit. We are dismayed that Strategy 4 only includes human-powered mobility options with no mention of the South Bay's Local Travel Network. In addition to increasing safety through protected lanes, the CMCP should encourage zero emission slower travel modes (e.g.: electric scooters, electric bikes, and other neighborhood electric vehicle technologies) that in the South Bay will use a network of designated slower neighborhood and collector streets rather than sharing the road with cars on busy arterials. Since 80% of trips in the I-405 Corridor are less than 5 miles, we have embraced slow-speed electric vehicles for those that need to travel between one and five miles within the corridor. We believe it is insufficient to only include human-powered bicycle and pedestrian modes especially since the SBCCOG Board of Directors has officially endorsed the implementation of the South Bay Local Travel Network. As mentioned in the CMCP, active transportation skyrocketed during the pandemic. However, e-powered devices make up a significant share of that growth. According to the NY Times, e-bike sales jumped 145% from 2019 to 2020, more than double the rate of regular bikes. We believe that trend will continue as new forms of micro-mobility vehicles are introduced to the marketplace.

The SBCCOG would like the CMCP policies and strategies to include the South Bay Local Travel Network (SBLTN). The project will create a 242-mile cross-jurisdictional network of low-speed local streets designated for active transportation modes and slow speed micro-mobility vehicles that allow individuals a safe route from their neighborhoods to destinations. There is no mention of the LTN or the South Bay Bicycle Master Plan even though there are statements in Section 4.11 about working with Corridor COGs and the Westside Bike Plan and Gateway Bike Plan.

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Besides being overlooked as being worthy of a regional strategy, the LTN is listed as a Tier 2B project on the CMCP project list. We feel the project should be a Tier 2A project. We continue to 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 reducing greenhouse gas emissions while having a great potential to relieve congestion on the major arterials. The project is also replicable through many other areas.

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 station platforms 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.

The SBCCOG also requests that the South Bay Fiber Network Phase 2 software applications and neighborhood connections be included in the Tier 2A list of projects. Now that the South Bay local jurisdictions have nearly completed the physical subregional network, we need to develop the local connections and software applications that will ensure that the SBFN supports advanced transportation applications and monitoring and the digital neighborhood work centers which will significantly reduce vehicle miles travelled.

Beyond ensuring that these major initiatives are included appropriately in the CMCP, we have the following comments:

- In Section 1.3 near term, there needs to be clarification that all new ExpressLanes would be 2 lanes in each direction. We also believe this number of lanes should have funding priority over the direct connectors called for in Section 1.9 which would be expensive and would require significant rights of way to be acquired.
- Strategy 4.8 refers to the I-710 improvements yet there is no mention of needed improvements in the parallel I-110 route from the San Pedro ports to warehouses and transloading facilities. We believe that the I-110 will experience growing congestion as the Gateway COG and Metro shift their attention from congestion reduction to truck emissions reduction in the corridor. Both corridors should be addressed.
- Strategy 5.7 calls for fare-free transit. This operating policy does not belong in a capital project plan.
- Strategy 6 should include a discussion of zero emission micro-mobility strategies to reduce emissions and improve neighborhood mobility.
- Strategy 7 – Goods movement. The section only mentions the I-405 and the I-710. It should also address goods movement strategies on the other connecting freeways and state routes including the I-105, I-110, SR 1, SR 42, SR 91, SR 107, and SR 213 in the South Bay.
- Strategy 8.2 –The Plan should distinguish between congestion pricing and Express Lanes. Although ExpressLanes typically include congestion pricing, there are other types of congestion pricing strategies that do not rely on corridors.
- Strategy 9 – 9.3 –This section should be expanded to discuss neighborhood digital centers and other capital projects and policies to facilitate telecommuting, e-business, and virtual meetings that reduce VMT.

We appreciate that the I-405 CMCP is to be considered a living document but believe that our comments should be included now. We do look forward to being part of the process as refinements are made in the future.

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

Sincerely,

John Cruikshank
SBCCOG Chair
Councilmember, City of Rancho Palos Verdes