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March 3, 2009

Mr. Richard D. Thorpe
Chief Executive Officer
Exposition Construction Authority
707 Wilshire Boulevard, 34th Floor
Los Angeles, CA 90017

**RE: COMMENTS ON GRADE CROSSING ANALYSIS FOR THE EXPOSITION
CORRIDOR PROJECT PHASE 2**

Dear Mr. Thorpe:

First of all, let me clearly state that LADOT is committed to working with you and your staff, as well as our leaders and stakeholders, to make Exposition Corridor Project Phase 2 safe and effective to meet the transportation demands of today and tomorrow. Our additional analyses of the modeling methodology and findings continue to pose challenges regarding several key intersections. These results indicate significant, however not insurmountable, operational, safety, and parking problems that will require our collective expertise to solve as we move forward.

During the last few months, LADOT has objectively attempted to assess the impacts of an at-grade alignment for the Exposition Corridor Project, Phase 2. Accordingly, we have modeled the proposed at-grade crossings at Overland Avenue, Westwood Boulevard, Sepulveda Boulevard, Barrington Avenue and Centinela Avenue. We performed simulations of the mitigation measures proposed by the Authority and used the most recent traffic and pedestrian count data provided by the Authority's consultants for comparison consistency. In addition, LADOT staff has field checked the affected locations during AM and PM peak periods to ensure that no obstructions or other problems were present that are not reflected in the model. We have shared our findings with you in our letter of June 2, 2008 and in meetings on November 20, 2008 and February 17, 2009.

In these meetings, we discussed your consultant's modeling methodology and assumptions at some length. One of the major issues in our discussions is the method that your staff uses to determine peak period volumes and queue lengths, thereby enabling an assessment of the frequency of stopped vehicles queuing over the tracks. For this assessment, we believe that the Synchro simulation model, which examines the 95% traffic queue length based on the nationally recognized Highway Capacity Manual, should be used for evaluation since the risk of queuing on the tracks should occur no

more than five percent of the time. Your staff agrees with this in concept. However, your staff uses a standard peaking factor of 1.5, which tends to represent a queue length that is exceeded far more than five percent of the time. Your staff could elect to use a higher peaking factor for assessing critical queue lengths, which is allowed in the MTA's Grade Crossing Policy, but chooses not to do so. Accordingly, we believe that the impacts that you show under-represent the associated safety risk of traffic queuing across the tracks.

Another major issue in our discussions is the negative impacts that proposed queue-cutter signals can have at nearby signalized intersections upstream and downstream. While they undoubtedly can mitigate the safety risk associated with queuing across the tracks, they can adversely impact operations at nearby adjacent signals due to the resultant short signal spacing. Our detailed analyses demonstrate that, in some cases, motor vehicle traffic would extend upstream of the tracks into the adjacent signalized intersection, thus creating intersection gridlock. In other cases, motor vehicle traffic extending sufficiently downstream of the tracks would need to override the synchronized signal timing so as to reduce the queue length, thereby negatively impacting the signal timing for east-west traffic. Finally, queue-cutter signals frequently would need to operate in red (due to long queues) even without trains approaching, thus disrupting progressive traffic flow for north-south vehicular traffic.

The third major issue is the belief by your staff that parking can be prohibited for extended hours adjacent to fronting homes. We have tried to communicate to your staff the infeasibility of this concept, since it would deny direct access to residences for visitors, deliveries, and service calls.

Our findings for each of the crossings follow.

Overland Avenue

LADOT modeled the crossing at Overland Avenue and the adjacent signalized intersection at Ashby Avenue, with an additional northbound and southbound lane. Even with these additional lanes, stopped traffic would exceed the storage between Ashby Avenue and the tracks (based on 95th percentile queues) northbound during the AM and PM peak periods, thus creating conflicts. Although your staff recently proposed a queue-cutter signal, it would be in the preemption mode regularly even when trains are not approaching. As a result, northbound traffic flow on Overland Avenue would be significantly impacted with long delays at the queue-cutter signal. In addition, traffic progression along Overland Avenue would be greatly diminished due to the extensive activation of the queue-cutter signal, with and without approaching trains. Our simulations indicate that northbound traffic would still queue to Coventry Place and block the intersection.

The at-grade proposal would deny daytime parking access to fronting residences along Overland Avenue in order to provide three lanes in each direction near the tracks. This would make it virtually impossible for residents to receive deliveries, visitors, and service calls, thus constituting a severe inconvenience.

Key Issue: Operational, safety, and parking problems for traffic, residents, and light rail trains.

Westwood Boulevard

As with Overland Avenue, the at-grade proposal would deny daytime parking access to fronting residences along Westwood Boulevard. This would deny residents the ability to receive deliveries, visits, and service calls, thus constituting a severe inconvenience. We do not believe that the proposed mitigation measures for the all-day removal of on-street parking along Westwood Boulevard adequately address these problems, due to the extensive walking distances involved.

Key Issue: Infeasibility of creating additional travel lanes on Westwood Boulevard without creating unmitigatable impacts to fronting residences.

Sepulveda Boulevard

You have proposed that Sepulveda Boulevard be widened to an 80-foot roadway (seven lane cross section) between Richland Avenue and Tennessee Avenue. However, you have not yet determined the feasibility of such a widening.

Even with an additional northbound and southbound lane, there still would be significant peak period queuing for northbound (AM and PM peak periods) and southbound (PM peak period) traffic between the rail crossing and Pico Boulevard. The southbound traffic approaching the track, during the PM peak period and the northbound traffic approaching Pico Boulevard during the AM peak period would adversely impact the operation at Pico Boulevard, since southbound queues would virtually extend to Pico Boulevard and northbound queues would disrupt the north-south signal timing.

It must be recognized that Sepulveda Boulevard serves as an alternate route to the Interstate 405 Freeway when incidents occur and the traffic volumes used for analysis do not consider these occurrences.

Key Issue: Traffic volumes on Sepulveda Boulevard and inadequate storage lengths between Pico Boulevard and the rail crossing.

Barrington Avenue

Our modeling analysis shows significant southbound queues between the tracks and the adjacent intersection at Olympic Boulevard during the PM peak period. In addition, the modeling shows significant queuing for both northbound (AM peak period) and southbound (PM peak period) traffic between the tracks and Pico Boulevard, which would greatly exceed the storage available to these critical intersections. Although a queue-cutter signal would tend to manage queue lengths from extending over the tracks for southbound traffic during the PM peak period, the intersections at Olympic Boulevard and at Pico Boulevard would be negatively impacted. The queues would extend northerly of Olympic Boulevard and east-west synchronized signal timing at Pico Boulevard would be compromised by frequent preemptions.

Key Issue: Serious operational and safety problems for both vehicular traffic and light rail trains.


Centinela Avenue

As proposed, a northbound turning lane was added on Centinela Avenue to eliminate potential safety risks from traffic queuing onto the rail crossing. Our modeling, however, continues to show significant queuing and interlock problems for all turning moves at the intersection of Centinela Avenue and Olympic Boulevard even with the addition of the northbound turning lane. This would exacerbate existing poor traffic conditions on Olympic Boulevard and could result in conflicts at the tracks due to excessive vehicular queuing between Olympic Boulevard and Pico Boulevard. In addition, the curved alignment on Centinela Avenue between Pico Boulevard and the rail crossing results in restricted visibility, which could result in increased rear-end collision potential for northbound vehicles queued upstream from the proposed at-grade crossing. More importantly, the intersection interlock at Olympic Boulevard would severely compromise the ability of northbound vehicles to clear the tracks and require that this signal be preempted for each and every approaching train.

Key Issue: Serious operational and safety problems for both vehicular traffic and light rail trains.

We will be submitting further comments about the project after our review of the Draft Environmental Impact Report. We look forward to continue working with you and your staff in the upcoming design and implementation phases of this important project.

Sincerely,


Rita L. Robinson
General Manager

JEF:jsi

c: Monica Born, Exposition Construction Authority
Honorable Jack Weiss, Council District 5
Honorable Bill Rosendahl, Council District 11
Jamie de la Vega, Mayor's Office