WRITTEN ARGUMENT IN SUPPORT OF HLA ADMINISTRATIVE APPEAL

I. PRELIMINARY STATEMENT AND INTRODUCTION

This Written Argument is submitted by Stephen Resnick, Lead Appellant, on behalf of the Ohio Ave Coalition in support of the formal administrative appeal under Los Angeles Municipal Code (LAMC) Section 85.12. This appeal challenges the Los Angeles Department of Transportation's (LADOT) proposed 90% design layout for the Ohio Ave Safety and Mobility Project (Project ID: DOT-26-00017).

The Ohio Ave Coalition is a unified, cross-jurisdictional alliance of community stakeholders and residents directly impacted by this corridor. The Coalition’s administrative challenge is formally supported by a broad block of thirteen (13) prominent local stakeholder organizations and regional groups. A comprehensive list of these supporting organizations is included in the supporting evidence.

The geographic and operational reality of this appeal spans the critical Interstate 405 freeway corridor, bridging communities across Council District 5 and Council District 11. Because of the massive West LA Veteran Administration campus, Ohio Ave functions as the singular vital collector street crossing under the I-405 freeway between Wilshire and Santa Monica Blvds. By finalizing a configuration that enforces sweeping permanent left-turn bans and severely reduces vehicular capacity, LADOT is not merely modifying a local roadway; it is destabilizing an already-gridlocked regional network that directly impacts residents, commuters, local commerce, and access to medical services.

The Coalition does not challenge or oppose the lawful advancement of regional bicycle infrastructure; rather, the Coalition challenges LADOT's legally and technically deficient

design. As demonstrated by the seventeen (17) explicit procedural, engineering, and statutory counts detailed herein, LADOT has failed to execute mandatory reviews required under Mobility Plan 2035, the Measure HLA Ordinance, and Americans with Disabilities Act (ADA) Title II mandates. Instead, LADOT actively bypassed mandatory public engagement protocols, utilized unscientific and manipulated travel modeling data, and ignored NACTO- and City-approved guidelines. Because the current layout manufactures artificial regional gridlock, cuts off localized medical access, prevents transit riders from accessing the upcoming D Line subway stations, and creates severe mid-block pedestrian hazards, the Lead Appellant respectfully requests that the Board of Public Works sustain this appeal and order an immediate project design reset.

Please note: 1) the supporting documents for each section and count below can be found organized under the respective section's or count's title, and 2) one of our members' requests for LADOT records under the California Public Records Act went unfulfilled, with no response at 10 days nor a request for an additional 14 days.

SECTION II: LEGAL MANDATES & MEASURE HLA VIOLATIONS

COUNT 1: Misleading HLA Exemption Status

Failure: LADOT active transportation planners posted on the HLA Dashboard that the Ohio Ave project was "Exempt" from Measure HLA mandates, creating a false administrative record. ***Remedy Sought***: A formal order striking the "Exempt" status and requiring a retroactive Measure HLA consistency audit. ***Argument***: LADOT has actively misled the public by labeling this project as exempt from Measure HLA on the official HLA Dashboard. This designation was exposed as an administrative untruth via a June

11, 2026 email from LADOT Supervising Transportation Planner Jack Moreau, who explicitly admitted that the project is not exempt from Measure HLA more broadly and must remain consistent with the Mobility Plan because it includes a new bicycle facility. Furthermore, this dashboard label directly contradicts LADOT's own financial records. In an official department memorandum dated October 14, 2020, LADOT explicitly leveraged the corridor's alignment with Mobility Plan 2035 to score, rank, and secure $8,406,583 in subregional grant funding. LADOT cannot selectively apply these mandates; the department cannot treat this project as a core Mobility Plan priority to secure millions in public funds while simultaneously maintaining an "Exempt" label to bypass mandatory compliance and safety reviews under Ordinance #188667. A comprehensive audit is fully warranted to correct this mischaracterization.

COUNT 2: Mandatory HLA Ordinance Consistency Review

Failure: LADOT failed to execute the mandatory safety and scope evaluations required by Measure HLA when it modified the funding and administrative parameters of the Ohio Ave project after the ordinance went into effect. ***Remedy Sought***: Stay all project authorizations until all post-March 2024 funding updates and project modifications are formally evaluated to implement the requirements of Measure HLA. ***Argument***: The City cannot rely on a grandfathered exemption defense based entirely on legacy planning actions. While the project received an initial grant allocation in 2020, construction has not yet commenced on Ohio Ave. Page 2 of Ordinance #188667 explicitly dictates that for any unbuilt Mobility Plan project awarded grant funding prior to the effective date, the city department *shall* determine whether the project meets HLA requirements, and if not, *shall* determine how the project scope can be modified to comply. LADOT actively

bypassed this non-discretionary statutory mandate. On April 7, 2025—well after Measure HLA went into effect—LADOT submitted a formal transmittal to the City Council requesting authorization to accept updated Measure M funding and commit new local West Los Angeles and Coastal Transportation Corridor TIMP matching funds. Because LADOT actively overhauled the project's funding and scope post-passage, it was legally required to trigger the mandatory re-evaluation clause of Ordinance #188667. The City cannot alter a project's parameters in the present day while claiming it remains frozen in time to evade safety compliance.

SECTION III: SYSTEMIC DESIGN & OPERATIONAL FAILURES

A. Single-Mode vs. Complete Streets

LADOT’s proposed design relies on the flawed assertion that they can use the corridor's Bicycle Enhanced Network (BEN) designation to override all competing Complete Streets mandates. By isolating the BEN infrastructure layer, LADOT systematically violates the balancing tests required by Mobility Plan 2035 and Measure HLA to safely accommodate the needs of all roadway users. This singular focus results in a cascading domino effect—where choosing a Class IV protected two-way cycle track width that the constrained right-of-way cannot structurally accommodate forces vehicle lane and turn pocket removal, creates severe ADA barriers, and triggers the arbitrary left-turn restrictions detailed below.

The intersection maps in LADOT's June 5, 2026 Community Presentation slides explicitly demonstrate this profound lack of multimodal balancing between bicycles, pedestrians, and vehicles. To preserve the administrative record for this appeal, the

explicit engineering failures, statutory violations, and remedies sought for this design series are itemized as follows:

COUNT 3: Misapplication of BEN Mandates

Failure: LADOT designed a layout that fails to install the mandatory geometric safety and multi-modal capacity elements required for corridors officially designated as part of Mobility Plan 2035's Bicycle Enhanced Network (BEN). ***Remedy Sought***: Rejection of the 90% blueprint and an order to redesign the corridor to meet full BEN infrastructure mandates. ***Argument***: Ohio Ave is designated as a BEN corridor from Westgate to Westwood. True Complete Streets engineering utilizes flexible lane widths and smart signaling to safely integrate protected bike lanes alongside existing vehicle lanes and turning pockets. Instead, LADOT treated this design as a zero-sum game, insulating the bike path by completely stripping away the street's vehicular capacity and essential turning lanes.

COUNT 4: Neighborhood Enhanced Network (NEN) Violations

Failure: LADOT's design relies on rigid physical barriers and lane stripping that actively conflict with the localized access and slow-speed community protections required under Mobility Plan 2035's Neighborhood Enhanced Network (NEN). ***Remedy Sought***: Redesign the right-of-way to incorporate standard NEN traffic-calming treatments that preserve neighborhood circulation while achieving multi-modal safety. ***Argument***: The dual designation of Ohio Ave as both a BEN and an NEN corridor requires a balanced engineering approach that maximizes safety without cutting off local residential access. By ignoring the NEN criteria and imposing travel lane repurposing and vehicle left-turn

bans at Barrington, Federal, Sawtelle, and Veteran, LADOT has completely disregarded the localized, slow-speed network rules codified within the Mobility Plan 2035.

COUNT 5: Failure to Apply NACTO Constrained Street Guidelines

Failure: LADOT staff claimed they were forced to eliminate vehicular capacity because national NACTO standards strictly mandate a minimum 9-foot width for two-way cycle tracks. ***Remedy Sought***: Restructure the cycle track design to utilize the NACTO standard 8-foot minimum width for constrained rights-of-way to preserve existing vehicle lanes. ***Argument***: LADOT engineers relied on an incomplete reading of the NACTO Urban Bikeway Design Guide. Page 158 (Chapter 3.3.1) explicitly states an absolute 8-foot threshold for two-way protected cycle tracks in constrained conditions. LADOT already uses this 8-foot standard at Sepulveda Blvd., making their refusal to apply it here arbitrary and discriminatory.

COUNT 6: Failure to Utilize BOE Minimum Width Standards

Failure: LADOT relied on an internal handbook (MPP 531) to falsely claim vehicular lanes cannot drop below 10 feet, using a departmental guideline to justify removing essential turning pockets. ***Remedy Sought***: Require LADOT to apply the authorized 9-foot constrained lane standard codified under Bureau of Engineering (BOE) Section E 612.21 to preserve the corridor's turn pockets. ***Argument***: BOE rules govern right-of-way dimensions and explicitly permit 9-foot lanes in highly constrained corridors. Because the City's Vision Zero policy also champions 9-foot lanes as an effective traffic-calming tool, LADOT cannot override city-wide engineering standards and manufacture a false narrative of spatial impossibility.

COUNT 7: Deficient Intersection Engineering at Veteran Ave

Failure: LADOT refused to apply constricted right-of-way measures east of the Veteran Ave intersection where the roadway narrows from 40 to 35 feet, and failed to modify the existing pedestrian bulb-out on the northwest corner to preserve the available footprint west of the intersection. ***Remedy Sought***: An engineering order requiring the application of NACTO and BOE minimum standards for the cycle track and travel lanes to preserve the existing street configuration, through-lanes, and turn pockets. ***Argument***: The current layout reduces vehicular traffic from two dedicated through-lanes and one left-turn pocket to just two shared lanes. LADOT chose to permanently degrade capacity and eliminate critical turn pockets, manufacturing an artificial safety and traffic crisis. Instead, LADOT can safely maintain the existing turn pocket and through-lanes within the restricted 35-foot footprint by using the 8-foot constrained cycle track standard under NACTO with the 9-foot travel lane exceptions under BOE Standards referenced above. LADOT cannot weaponize its desire to avoid construction costs as a valid engineering justification for permanently degrading neighborhood capacity.

COUNT 8: Structural Passenger Entrapment and ADA Violations

Failure: LADOT's layout places a continuous 18-inch concrete Toronto barrier directly between the cycle track and the street in corridor segments without parking, blocking the path of travel for pedestrians, including the elderly and persons with mobility impairments, trying to cross the street mid-block. ***Remedy Sought***: Mandate that LADOT place structural cuts in the 18-inch barrier at regular, standardized intervals to provide pedestrian pass-throughs with a minimum 36-inch unobstructed clear width

paired with dedicated refuge zones. ***Argument***: Under ADA Title II and Public Rights-of-Way Accessibility Guidelines (PROWAG), physical installations cannot create impassable barriers that truncate accessible pedestrian paths. By constructing an unbroken concrete wall along the roadway, LADOT creates an active public safety hazard that textually blocks pedestrian egress and effectively traps vulnerable road users in the path of oncoming traffic during mid-block crossings.

COUNT 9: Civil Rights Non-Compliance at Designated ADA Spaces

Failure: LADOT's most recent drawings show placement of the parking on the north side of Ohio Ave directly against an 18-inch Toronto barrier and adjacent to the two-way cycle track. The design provides a disabled space at the beginning of the block, which fails to address the elderly and disabled who do not have a disabled placard and will be unloading mid-block. ***Remedy Sought***: Order LADOT to restore parking infrastructure to the south side of Ohio Ave along the entire corridor to completely isolate passenger loading from the cycle track infrastructure. ***Argument***: Placing parking in an 8-foot lane flush against an 18-inch concrete barrier makes it physically impossible for passenger-side doors to open safely. This layout creates an active ADA Title II compliance failure; as documented in the FHWA Separated Bike Lane Guide, baseline parking minimums fail to account for un-placarded passenger loading, effectively trapping fragile, elderly, or mobility-impaired individuals in a narrow asphalt channel and forcing them to step directly into the active, two-way cycle track to reach the sidewalk.

COUNT 10: Reliance on Flawed Peak-Hour Data Windows

Failure*:** LADOT justified sweeping right-of-way changes using an artificial 16.2 mph corridor average derived from a truncated afternoon data set, while completely failing to model or mitigate the resulting spillover traffic forced into surrounding residential neighborhoods. **Remedy Sought:** Stay the project until a comprehensive regional diversion analysis is completed in strict compliance with LADOT Transportation Assessment Guidelines using the mandatory 4:00 PM to 7:00 PM peak window to address the timing flaw. ***Argument: The department's claimed "65-second detour" is a mathematical fiction. While standard local traffic engineering mandates tracking the PM peak period until 7:00 PM, LADOT's travel-time diversion models end abruptly at 4:15 PM. This systematic data truncation intentionally masks severe regional gridlock, hiding the true impact of the project: displacing high volumes of frustrated motorists off Ohio Avenue and directly onto quiet local residential side streets.

COUNT 11: Unmitigated Regional Traffic Displacement

Failure: LADOT failed to model or mitigate the spillover traffic forced into surrounding residential neighborhoods by proposed left-turn bans. ***Remedy Sought***: Issue an immediate administrative stay on all project authorizations until LADOT expands its traffic diversion modeling to include a validated, regional network analysis that accounts for actual vehicular displacement from all directions to address the geography flaw. ***Argument***: The "65-second detour" is a mathematical fiction. LADOT scrubbed peak hour gridlock data and selectively defined the segment they used to bypass heavy traffic times, intentionally hiding the true regional impact of shifting vehicles off Ohio Ave.

COUNT 12: Elimination of Existing Left-Turn Infrastructure

Failure: LADOT banned eastbound left turns at Barrington, Federal, Sawtelle and Veteran under the pretext of regulatory compliance with January 2026 updates to the CA MUTCD regarding management of left turns across a two-way cycle track. ***Remedy Sought***: Keep existing eastbound left-turn pockets to preserve corridor capacity, community access, and directional symmetry. ***Argument***: LADOT is misrepresenting the guidance provided in the January 2026 CA Manual on Uniform Traffic Control Devices update and is using it to force sweeping left-turn prohibitions that degrade local circulation, direct left-turning neighborhood traffic onto Santa Monica Blvd, and actively endanger cyclists by forcing frustrated drivers to execute dangerous, unsignalized mid-block left turns across the two-way cycle track.

COUNT 13: Failure to Deploy ATSAC Smart Signal Alternatives

***Failure*:** LADOT bypassed the use of their sophisticated ATSAC smart signal-based traffic control in favor of disruptive street construction and unnecessary right-turn pockets. ***Remedy Sought*:** Implement a 4-phase ATSAC traffic signal programming alternative with dedicated bicycle signal phases for all signalized intersections. ***Argument*:** LADOT is choosing to permanently degrade neighborhood circulation with physical left-turn bans and unneeded dedicated right-turn pockets. Using LADOT's world-class ATSAC smart signal programming is a lower cost alternative that can manage traffic and turning conflicts dynamically today, and can be modified to address traffic turn volume changes in the future. Executing ATSAC's 4-phase programming completely isolates turning movements across the cycle track, protecting cyclists via dedicated, conflict-free signal phases. This software-driven optimization fully eliminates

the shared-lane congestion manufactured by LADOT's proposed design, all while protecting cyclists and eliminating the need to restrict local community access.

B. Geometric Proof of Feasibility Under Constrained Parameters

LADOT's administrative assertion that right-of-way limitations "force" the elimination of turn pockets is mathematically false. At the highly restricted Veteran Ave intersection, Ohio Ave narrows to a constrained ~35-foot curb-to-curb width. By utilizing national and municipal engineering standards for constrained conditions, a compliant multimodal layout is entirely achievable within the existing footprint:

- NACTO Urban Street Design Guide (Ch. 3.3.1): Permits an absolute minimum 8-foot width for a constrained two-way cycle track.
- BOE Standard Plan (S-612.21): Permits an absolute minimum 9-foot width for a constrained vehicular travel lane.

Combining an 8-foot cycle track, a minimal protective buffer, and three 9-foot vehicular lanes utilizes the ~35-foot right-of-way footprint perfectly. Allocating this space into two 9-foot through-travel lanes and a dedicated 9-foot left-turn pocket completely preserves intersection capacity while fully maintaining the protected bike infrastructure, entirely invalidating LADOT's claims of spatial impossibility.

C. Evaluation of Feasible Design Alternatives

To address the geometric constraints and safety failures inherent in LADOT’s 90% blueprint, Appellants submit two viable engineering alternatives, fully detailed with cross-sections in the Supporting Document of the Ohio Ave Coalition Proposed Design Alternatives: *Option 1: Protected Two-Way Cycle Track (Flexible Buffer Configuration)* and *Option 2: Protected One-Way Cycle Tracks (Split Configuration)*.

SECTION IV: INSTITUTIONAL, TRANSIT, & PROCEDURAL DEFICIENCIES

COUNT 14: 2018 West LA VA Master Plan Traffic Impact Analysis

***Failure*:** LADOT's proposed physical barriers and turn restrictions at Barrington, Federal, and Sawtelle directly violate the City's signed 2018 Inter-Departmental Environmental Accord, threatening federal veteran housing mandates. ***Remedy Sought*:** Strike all barrier layouts and turn restrictions that directly conflict with the mitigation requirements established under the 2018 West LA VA Development Review agreement. ***Argument*:** LADOT's current layout stands in direct conflict with Appendix E (LADOT Inter-Departmental Correspondence and Traffic Assessment) of the Final Programmatic Environmental Impact Statement (PEIS) Appendices for the WLA Campus Master Plan. In that signed agreement, the City formally and legally concluded that perimeter traffic impacts were fully mitigated via a 25% Transportation Demand Management (TDM) trip-reduction plan, explicitly ruling out physical entry barriers or turn bans. Unilaterally imposing these restrictions now threatens current Federal court WLA VA housing mandates and forces an un-funded, costly Supplemental Environmental Impact Statement (SEIS). This operational consensus was finalized in LADOT's May 13, 2019 final assessment letter, which explicitly restricted regional mitigation to a TDM plan and internal campus roadway improvements, leaving no legal or environmental basis for unilateral mid-block barriers or turn bans on adjacent municipal segments.

COUNT 15: WLA VA and UCLA Medical Facility Access

***Failure*:** LADOT failed to perform adequate traffic modeling or patient transit assessments for the West Los Angeles VA Medical Center and the UCLA Rehabilitation

Center located at 1000 Veteran Ave. ***Remedy Sought*:** Halt project execution until a comprehensive medical access impact study is completed and signed off by the administrators at the WLA VA Medical Center and UCLA Health. ***Argument:*** The eastbound left-turn into the Ohio Ave gate at Sawtelle Blvd is a critical route used daily by patients, staff, and paratransit providers like Access Services to reach the WLA VA Medical Center. Additionally, the eastbound left-turn at Veteran Ave allows direct access to the UCLA Rehabilitation Center, which is the sole provider in Westwood for UCLA physical and occupational therapy. By completely omitting traffic modeling and access planning for these vital facilities, LADOT has designed a corridor that actively restricts medical transport and patient drop-offs. Forcing fragile patients into long traffic detours creates unnecessary treatment delays and a serious liability for the City. LADOT's total omission of modeling here is indefensible given that its own May 13, 2019 evaluation formally accepted baseline data showing WLA VA campus expansion will inject 3,949 net new daily trips (including 351 AM / 355 PM peak-hour trips) directly into the WLA VA campus' critical medical access points.

COUNT 16: Metro First/Last Mile (FLM) Access

***Failure*:** LADOT's proposed design does not support multi-modal transit access to the new regional rail network because it fails to follow Metro FLM planning guidelines that mandate pedestrian, bike, and vehicle access to the new Metro D-Line stations in Westwood and on the WLA VA campus. ***Remedy Sought*:** Integrate dedicated curb-side loading zones at the Barrington, Federal, and Sawtelle intersections leading to the new WLA VA D-Line Station, and preserve vehicle eastbound left-turns at the Barrington, Federal, Sawtelle and Veteran intersections. ***Argument*:** Ohio Ave is a

designated Metro First/Last Mile (FLM) corridor tied directly to the incoming West LA VA and Westwood D-Line Subway Stations. Metro projections show that the upcoming VA D-Line station opening in 2027 will serve as the terminus of the subway line and will handle 8,000 daily boardings. Despite this massive influx of transit users, LADOT's design completely blocks Ohio Ave from working as a true First/Last Mile connection for people taking rideshares, shuttles, or private vehicles to the station area. By restricting eastbound left-turns along the corridor, vehicles and shuttles cannot easily reach the stations, creating severe regional gridlock instead of appropriately balancing all forms of transit as required under HLA. This design actively defeats the explicit multi-modal conditions laid out in LADOT's May 13, 2019 assessment letter to the WLA VA, which legally required "enhanced shuttle service" and "safe and convenient areas for carpool/vanpool loading" to mitigate regional transit impacts along this exact corridor.

COUNT 17: Public Outreach and Selective Community Engagement

***Failure*:** LADOT failed to provide legally compliant region-wide notifications, violated DONE and ENS protocols for Westwood NC (WWNC), withheld design phase progress from the members of the Westside Regional Alliance of Councils (WRAC) and bypassed outreach to three of the five member Councils affected by the project. ***Remedy Sought*:** An immediate project stay and design reset to the 30% conceptual phase pending a formal, 60-day regional comment period. ***Argument*:** The record refutes LADOT's claim of a collaborative five-year outreach pipeline, revealing a highly selective strategy designed to insulate design review from regional oversight. From 2022 to 2023, LADOT completely failed to agendize the project with any of the five locally impacted Councils and their stakeholders. In 2024, LADOT conducted siloed, selective briefings about the

two-way cycle track design with the West LA Sawtelle NC and North Westwood NC (NWWNC). On December 11, 2025, LADOT shared notice of the critical 60% design phase with NWWNC, but withheld this from WRAC, WWNC, Brentwood and Westwood Community Councils. Then, the official project document FAQs updated in February 2026 stated LADOT reached the 90% phase in January 2026. This impossibly quick timeline proves the project design was entirely pre-determined without public input, and intentionally bypassed the mandatory public discussion of design alternatives. The Spring 2026 Open Houses presented a fraudulent *fait accompli*. Bypassing standard design milestones explicitly violates LADOT's Lane Reconfiguration Guidelines and constitutes a clear abuse of administrative discretion.

SECTION V. CONCLUSION AND REQUEST FOR RELIEF

For the foregoing reasons, Appellant respectfully requests that the Board of Public Works uphold this appeal, find LADOT's current design non-compliant with applicable municipal and administrative standards, and grant the specific items of administrative relief sought herein.

Respectfully submitted,

Stephen Resnick, Lead Appellant, on Behalf of the Ohio Ave Coalition

Pursuant to LAMC Section 85.12, Appellant Steve Resnick appeals the Ohio Avenue Safety and Mobility Project's design for non-compliance with the HLA Ordinance.

Primary Legal and Factual Bases for Appeal:

1. LADOT failed to execute a mandatory HLA compliance review. In April 2025, LADOT requested the City Council accept further Measure M funding for the project (CF 20-1335). Occurring post-HLA, this action triggered a reevaluation of the project's grandfathered status, which was bypassed. **Remedy sought:** Formal compliance reevaluation per the HLA Ordinance.

2. LADOT failed to maintain HLA status consistency. The HLA Dashboard lists the project as "exempt;" an external LADOT email states, “That does not mean the project is exempt from Measure HLA more broadly.” Further, LADOT ignored its October 2020 transmittal (CF 20-1335) stating the project "...advance(s) the City's transportation goals described in the Mobility Plan 2035." **Remedy sought:** A project design reset incorporating standard BEN/NEN network Enhanced Complete Streets treatments.

3. LADOT failed to comply with ADA Title II and CA codes. Placing parking against an 18-inch permanent Toronto barrier reduces clearance for disabled passengers exiting vehicles mid-block next to the protected two-way cycle track. **Remedy sought:** Relocate the parking lane to the opposite side of the street to ensure safe, unobstructed sidewalk access.

4. LADOT’s design fails to incorporate medical facility access, First/Last Mile access and the 2018 WLA VA Traffic Analysis Study. Imposing left-turn bans at Barrington, Federal, Sawtelle (WLA VA Ohio Ave. gate), and Veteran permanently bans eastbound Ohio Ave access to the WLA VA campus, Medical Center, and UCLA Rehabilitation Center. It also blocks access to WLA VA and Westwood D-Line stations. **Remedy sought:** Maintain eastbound left-turns to preserve vital medical, shuttle, paratransit, rideshare, and vehicle access to these facilities and stations.

5. LADOT fails to acknowledge Ohio Ave. is a constricted right-of-way. Refusing to use tools like an 8-foot cycle track, 9-foot travel lanes, and ATSAC signal optimization directly causes the loss of existing left-turn pockets, creating severe traffic diversion and displacement. **Remedy sought:** Treat the corridor as a constricted right-of-way and use design tools to create a project design that balances the needs of all road users.

6. LADOT failed to provide equal outreach to all 5 impacted WRAC-member Councils. The proposed design was shared with two Councils in Winter/Spring 2024; the rest received a briefing in Fall 2025. LADOT then rushed the design from 60% to 90% in 118 days, bypassing the required public design alternative phase. **Remedy**

sought: Comprehensive, city-led consultation and design alternatives with all five impacted WRAC Councils and the public prior to design completion.

Supporting Documents