

Communication from Public

Name: Mary Benson

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Council File No: 23-0722

Comments for Public Posting: Requesting an EIR due to impacts that cannot be mitigated to a level of insignificance and comments on Proposed Mitigated Negative Declaration SCH 2025021226 Phase IV Bike Path. Recommend that the Bureau of Engineering, adopt specifications for Equestrian Recreational Trails published in cooperation by USDA - US Forest Service and USDOT - Federal Highway Administration EQUESTRIAN DESIGN GUIDEBOOK FOR TRAILS, TRAILHEADS AND CAMPGROUNDS DECEMBER 2007 Reprinted August 2009 0723-2816-MTDC
<https://www.fs.usda.gov/t-d/pubs/htmlpubs/htm07232816/toc.htm>

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March 17, 2025

VIA ELECTRONIC MAIL

Christopher Adams
Department of Public Works, Bureau of Engineering
1149 S Broadway, 6th Floor Mail Stop 939
Los Angeles, CA 90015-2213

**COMMENT REGARDING LA RIVERWAY PHASE IV BIKE PATH PROJECT
COUNCIL FILE 23- 0722
PROPOSED MITIGATED NEGATIVE DECLARATION SCH - 2025021226**

Dear Mr. Adams:

The Los Angeles Equine Advisory Committee would like to thank members of the Bureau of Engineering for presenting the proposed plan for the Phase IV Bikeway along the Los Angeles River. At the 2/28/2025 virtual meeting as we'll as prior meetings, public comment focused on the danger to equestrians by bifurcating the existing Equestrian Trail to add a bikeway to the trail alignment and separate it with fencing.

This proposal would impact 100% of the equestrian traffic coming from the north side of the Los Angeles River. It is the finding of the LAEAC that the impact to equestrians cannot be mitigated to a level of insignificance by any type of fence or barrier and an EIR should be required. There is no other access afforded to equestrians between where horses are kept and the historic bridle paths in Griffith Park. Access via the Los Angeles River from decomposed granite equestrian ramps was previously removed. The risk of injury to horses or riders passing each other in opposite directions introduces a new risk because of the reduction in the width from 20 feet (Griffith Park Trail Standard width) to 10 feet.

The volume of equestrian traffic was not taken into account by the Phase IV study. The demographics of which include young children, novice horseback riders and senior citizens. At



the meeting several women commented on the combative attitude and intimidation employed by current bicyclists illegally using equestrian trails in Griffith Park. The volume and frequency of equestrian use must be studied and a plan for user conflict considered.

The LAEAC also questions the jurisdiction of the City in its proposed action. According to maps, the area in question is the jurisdiction of Los Angeles County Flood Control via a flood control easement and the Department of Recreation and Parks over which those easements are granted. The trail alignment has been dedicated and deed recorded as an equestrian trail.

The third issue is cost. The estimated price tag for the one-mile bikeway is now estimated to be \$9 million. Further study should be done to investigate improving the existing bike lane on Zoo Drive to Forest Lawn Drive which would leave the historic equestrian access intact.

In conclusion, the EAC would be pleased to lend its experience and share its comprehensive database of trail documents with all city departments concerning recreational trails. Please feel free to contact me at (818) 720-7062 or Mary.Benson@lacity.org with any additional questions or comments.

Before proceeding with the project, the LAEAC requests a response to the following comments:

Safety and Trail Use

1. Department of Transportation has proposed another bicycle path along the same general route. <https://ladotlivablestreets.org/projects/forest-lawn>. Please provide a statement to justify why this is not a redundancy of providing two bicycle path improvements within 200 feet of one another.
2. Please also describe the signage and any other measures proposed to arbitrate user conflicts and possible aggression by bicyclists.
3. Please include an analysis of the impacts from LAMC 63.44 related to historic bridle paths and equine animals as Amended by Ord. No. 160,401, Eff. 11/1/85.) and Ord. No. 184,021, Eff. 1/27/16.)
4. Bike lane improvements are also planned by the City of Los Angeles, Department of Recreation and Parks along Zoo Drive connecting to Forest Lawn Drive. This will give bicyclists two alternative routes along the same alignment through the area. The Zoo Drive alignment gives bicyclists access to the LA Zoo, Travel Town, and the Autry Museum. Define the overriding consideration logic used to provide two rights-of-way to one group of users while removing 50% of the access and creating a sub-standard bridle path for an existing group of users with no other means of access to the park.
5. Please explain how the proposed bike path is exempt from LAMC 63.44 as Amended by Ord. No. 180,461, Eff. 2/8/09
6. Conversion of bridle trails to multi-use trails has resulted in frequent and major injuries from user conflict and resulting in disenfranchisement of equestrians. How will this additional risk be mitigated?

JURISDICTION

7. Please provide documentation that transfers jurisdiction for the deed-recorded LA COUNTY Bridle Trail easement to the City of Los Angeles.
8. Please provide documentation granting jurisdiction and authority by the City of Burbank to allow bicycle use of the historic Mariposa Equestrian Bridge.
9. When was the conversion of a dedicated bridle trail to multi-use allowing bicycles approved by the County of Los Angeles?

TRAFFIC

10. LADOT Mobility Plan excludes equestrian use from consideration. Please provide an additional equestrian traffic study of the existing use during a time when the trail is not closed. Sections of the trail were closed for maintenance at the time cameras were posted. Please conduct a new traffic survey to assess the current level of equestrian use along the proposed route and the expected bicycle use.
11. Please describe how emergency access to the proposed trail alignment will be affected and the mitigation proposed in case of the need for emergency access
12. When will the project include a signal or RRFB crossing for Forest Lawn Drive?
13. Who will be responsible for maintaining the proposed multi-use trail?
14. Please include provisions for signage prohibiting bicyclists from using historic bridle trails in Griffith Park.
15. Are there any current or future plans to convert equestrian tunnels to multi-use?

HISTORIC RESOURCES

16. Are mapped bridle trails listed as an element of the historic resources of Griffith Park? (HCM942)
17. Please analyze the footing used on the Mariposa Bridge and its suitability for bicycles.
18. Was the conversion of a dedicated bridle trail to multi-use approved by the County of Los Angeles Department of Parks and Recreation?
19. Will any mature trees be removed for the paved bike path?
20. Please analyze the impact of bicycle traffic and its proximity to Martinez Arena

DESIGN GUIDELINES

21. What design standards and specifications does the City have for the construction of bridle trails?
22. What training has the Bureau of Engineering undergone for the design of recreational trails?
23. Has any member of the current City of Los Angeles, Bureau of Engineering staff ever attended the annual State of California Trails and Greenways Conference?
24. What is the proposed surface for the reduced-width bridle trail? Would a surface like wood mulch or sand, interspaced with trail bars, be considered to discourage bicycles from using the equestrian side of the trail?
25. Has there been any study on the increased risk of injury to equestrians, or to their horses for horses passing in opposite directions?
26. What is the standard width of historic bridle trails in Griffith Park?

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27. Has the City of Los Angeles retained any consultant or firm specializing in equestrian trail design?
28. Does the Department of Transportation agree to include detailed planning for equestrian trails in their next Mobility transportation plan?
29. Has the Bureau of Engineering considered including other deed recorded Equestrian trail easements in NavigateLA?

Sincerely,

Mary Benson

Mary Benson, President
Los Angeles Equine Advisory Committee

cc:

City Council

Karen Bass, Mayor

Vincent Bertoni, Planning

Ted Allen, BOE

Osama Younan, DBS

Jimmy Kim, RAP

Joe Salaices, RAP

Stefanie Smith, RAP

LAMC 63.44 (B)(16) No person shall drive or ride any cycle or vehicle, whether powered by a motor or human power, except on paths, roads or drives designed and provided for such purposes

Communication from Public

Name: T. Hagans

Date Submitted: 03/27/2025 12:13 PM

Council File No: 23-0722

Comments for Public Posting: While I support the expansion of active transportation infrastructure across Los Angeles, the proposed Phase IV Bike Path represents a redundant and fiscally questionable investment, particularly given the forthcoming protected bike lanes and connectivity improvements planned just blocks away on Zoo Drive. The Phase IV alignment offers minimal added value while duplicating services and consuming over \$9 million in public funds—at a time of serious fiscal constraint. These resources would have far greater impact if invested in communities that currently lack safe cycling infrastructure. In addition, the proposed design raises significant trail safety concerns for equestrian users. The equestrian trail is confined to a narrow corridor in certain segments (as narrow as 8 feet) and is directly bordered by fencing and built infrastructure. This raises concerns about inadequate shy distance- the lateral space horses instinctively need to sidestep or "shy" away from perceived threats. According to the U.S. Forest Service's Equestrian Design Guidebook, horses often shy 2 to 4 feet away from vertical objects, and trail design must accommodate this behavior for rider safety (USFS, 2007). Without sufficient lateral clearance from fencing and barriers, horses may have no safe space to react, increasing the risk of accidents, especially in constrained segments with limited passing room. Moreover, the project's use of visual screening on fencing further compromises equestrian safety. As stated in the same guidebook: "Horses feel more comfortable when they can see what is around them. Obstructions such as high walls, dense vegetation, or fencing can increase anxiety and the likelihood of spooking-especially when sounds or movement come from behind or beside the barrier." By obstructing views of approaching pedestrians, cyclists, or wildlife, the design increases the unpredictability of the trail environment, making it more likely that horses will startle or react defensively. This not only compromises rider safety but could lead to avoidable conflicts between trail users. Furthermore, the project would remove mature trees along the proposed alignment-trees that are integral to Griffith Park's ecology, identity, and climate resilience. These trees provide cooling shade, habitat, air purification, and carbon sequestration-services that take decades to restore. Replanting cannot fully mitigate these losses. When

assessed cumulatively with other nearby projects (e.g., Zoo Drive), these impacts should be considered significant under CEQA. Given the design deficiencies, environmental consequences, and redundant alignment, the use of a Mitigated Negative Declaration is insufficient. A full Environmental Impact Report is warranted to assess the project's cumulative, ecological, and user-safety impacts. Thank you for the opportunity to comment. I respectfully urge the city to reconsider advancing this project without a comprehensive environmental review that fully addresses its equity, design, and ecological implications. T. Hagans