AAA JUN 10 2001

SCANNED
IN RMC

AUTOMOBILE CLUB OF SOUTHERN CALIFORNIA

June 7, 2001

Mr. David Mieger, Project Manager
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop: 99-22-5
Los Angeles, CA 90012

RE: Mid-City/Westside Transit Corridor Draft EIS/EIR

Dear Mr. Mieger:

Thank you for this opportunity to provide comments on the Mid-City/Westside Transit Corridor Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR). The draft EIS/EIR is a comprehensive document that reflects a considerable amount of high quality staff and consultant work. 1

The Mid-City/Westside area of Los Angeles includes dense population and employment centers, well-known cultural and educational institutions, and a host of shopping and entertainment destinations. The area's demographic and land use make up, relatively high rate of transit usage, and very heavy traffic congestion, all combine to provide the MTA with an ideal setting for improving the transit system and increasing transit ridership. Transit projects in this, and all, areas, however should be developed individually and they should be approved based on their ability to provide mobility benefits in a cost-effective manner and with a minimum amount of negative impacts. Based on these goals, and our analysis of information provided in the draft EIS/EIR, we urge the MTA to: 2

- Separate the Wilshire Bus Rapid Transit (BRT) and Exposition BRT/Light Rail Transit (LRT) alternatives into two separate projects that can be evaluated, refined, and approved or rejected independently. 3

- Select the Transportation System Management (TSM) option, with enhancements to the existing Metro Rapid bus service, as the locally preferred alternative for Wilshire Boulevard at this time. 4

- Select the LRT full-length option as the locally preferred alternative for the Exposition Right-of-Way. 5

Headquarters: LOS ANGELES · Administrative Offices: COSTA MESA
Mailing Address: P.O. BOX 25001, SANTA ANA, CA 92799-5001

The Wilshire Boulevard BRT alternatives do not appear to provide sufficient mobility benefits, transit time savings, or transit ridership increases to warrant the removal of 13.2 miles of traffic lanes, in each direction, and on-street parking at this time. Instead, the MTA should upgrade the successful and popular Metro Rapid service to include other BRT concepts including higher capacity 60-foot articulated buses, multiple-door boarding and alighting, and pre-paid fares. These features, combined with additional TSM improvements along the corridor, will deliver most of the benefits of the proposed Wilshire BRT without the negative traffic and economic impacts of removing traffic lanes and on-street parking. 6

Altering existing traffic lanes can be considered at a later date when the MTA is prepared to introduce higher capacity transit vehicles that are longer than 60 feet. The draft EIS/EIR indicates that the MTA plans to use existing 40-foot Metro Rapid buses and/or 60-foot single-articulated buses on Wilshire Boulevard for the near future. The draft document does not include any specific plans or dates for the MTA to seek approval for, and to begin operation of, 80 foot double-articulated or even higher capacity concept transit vehicles in the corridor. 7

The Exposition Right-of-Way and surrounding communities appear to provide both the adequate space and the needed transit demand for a successful light rail line. The draft document notes that ridership on the proposed LRT line is expected to reach over 51,000 by 2020. The inclusion of a parallel bike path along the corridor would further enhance the project and would provide an additional travel choice for the area's residents and workers. The development of LRT in this corridor, however, must sufficiently mitigate negative impacts, including traffic safety, noise, vibration, pedestrian accidents, traffic intersection impacts, and social equity issues. The final document should include additional analysis and resolution of these impacts. 8

The following sections include additional comments on more specific aspects of the draft EIS/EIR and the proposed alternatives. 9

Wilshire BRT Traffic Impacts

All of the Wilshire BRT alternatives would have significant negative traffic impacts. These traffic impacts stem primarily from the removal of two travel lanes and some vehicle turning movements. In addition, the Wilshire BRT alternatives would negatively impact levels of service (LOS) at 13 to 20 intersections, depending on the specific alternative. Of the three Wilshire BRT alternatives studied, Alternative 1B (curb lane) would appear to have the least negative impacts. In this alternative, existing left and right-turn movements would be retained throughout the corridor. 10

Wilshire BRT Parking Impacts

The draft document indicates that 1,211, or 92%, of existing on-street parking spaces would be removed to make way for a Wilshire BRT project. This would have serious and immediate negative impacts on the businesses located along Wilshire Boulevard. The loss of these spaces, combined with the loss of 70 taxi, shuttle, and valet spaces, would also have a negative impact on customers, hotel guests, and restaurant patrons throughout the route. The final document should include an estimate of the demand for station parking and provide a plan for meeting this need.

Exposition LRT Traffic Impacts and Grade Separations

The draft document indicates that the Exposition full-length LRT option would include 14 grade separations and that a total of 16 traffic intersections would operate at LOS "E" or worse during peak traffic hours. Some of the non-grade-separated intersections would be equipped with four-quadrant gates for increased safety. The final document should include more detailed information on the methodology used for determining which intersections would be grade separated and a cost analysis for additional grade separations. Although additional grade separations would increase the project's cost, the resulting, and lasting, transit service, safety, and traffic flow improvements provided by the grade separations may justify the additional expense.

Exposition LRT Parking Impacts

The proposed Exposition full-length LRT includes park and ride facilities at only eight of the line's 17 stations, with a total of 3,600 parking spaces. This parking plan appears to be inadequate to meet likely parking demand based on ridership estimates. The final document should include parking facilities at more station sites and additional parking spaces at currently planed facilities.

Exposition LRT Noise and Vibration Impacts

According to the draft document, 135 residences are projected to experience negative noise impacts, with 27 reaching the level of severe impacts. Most of the severe impacts are projected to occur along the south side of Exposition Boulevard between Arlington Avenue and Crenshaw Boulevard, where the back yards of residences directly abut the alignment. The final document should provide additional information regarding proposed noise mitigation efforts for these homes, including the plan to construct four to eight-foot sound walls in some sections. In addition, the final document should consider the inclusion of sound walls at all locations immediately adjacent to residences, even if the results of sound studies do not specifically require them. Inclusion of sound walls,

or other noise mitigation, at the time of construction would avoid likely and lengthy disputes with property owners and renters and costly retrofit sound wall projects at a later date. For these same reasons, the final document should include a cost estimate for the inclusion of ballast mats adjacent to all residential areas throughout the route. 14

Again, thank you for the opportunity to provide comments on the draft document for the Mid-City/Westside Transit Corridor. Please call me at 714-885-2307 or John Zeigler at 714-885-2308 if you have any questions or if you need any additional information. 15

Sincerely,

Steve Finnegan

Stephen A. Finnegan
Principal Transportation Policy Specialist

ing Owners
nagers
ciation
eater
ngeles

uth Flower St.
108
geles, CA 90017

-2662
3-624-1031

mmagla.org

BOMA(1)

Chairwoman Yvonne Brathwaite Burke
Supervisor Michael Antonovich
Supervisor Don Knabe
Supervisor Gloria Molina
Supervisor Zev Yaroslavsky
Mayor Richard Riordan, 2nd Vice-Chair
Councilman Hal Bernson
Mr. Jaime de la Vega
Mr. Jose Legaspi
Mayor Frank C. Roberts
Councilman James Cragin, 1st Vice Chair
Councilman John Fasana
Councilwoman Jenny Oropeza
One Gateway Plaza
Los Angeles, California 90012

June 7, 2000

Dear MTA Board Members:

On behalf of the Building Owners and Managers Association of Greater Los Angeles (BOMA), I would like to express our opposition to the proposal to locate a Bus Rapid Transit (BRT) system, or dedicated busway, down Wilshire Boulevard for the Mid-City/Westside Transportation Corridor. The plan proposes a dedicated busway from Western Avenue to the City of Santa Monica, which will negatively impacting many, many communities throughout the Westside. 1

BOMA is an organization that represents commercial office building owners throughout Los Angeles County, including along the Wilshire corridor. Our members are owners and managers whose companies range in size from national corporations to family businesses. 2

As you are aware, the Los Angeles City Council recently voted to oppose the Wilshire dedicated busway as a means of improving east-west movement. We agree. The devastating impact of the proposed busway to a community that only a few years ago endured the MetroRail construction is not assuaged by the supposedly-increased ridership of these buses. 3

Why would the busway harm the Wilshire corridor?

- Wilshire Blvd. cannot be widened to resemble the streets of Curitiba, Brazil, the model for the proposed busway. 4
- With the busway in the center of the street, left turn lanes must be eliminated. 5
- Two additional lanes will be removed, leaving fewer lanes for the same number of cars. 6
- North/south traffic would be affected, as would entrance into businesses. 7
- Elimination of street parking is particularly damaging to the business community. 8
- Local buses would continue to operate on Wilshire, causing further gridlock. 9

Businesses, including office buildings, have worked hard over the last 10 years to upgrade their area, creating a business improvement district to enhance their environment. As the MetroRail construction finished, thousands of volunteers worked hard to the final streetscape would reflect a 8vital neighborhood. To now consider tearing up Wilshire Boulevard again angers the residents and business owners and would frustrate their efforts to upgrade the area. 10

There are other alternatives under consideration, including the Exposition Right-of-Way. We hope the Board focuses staff efforts on more realistic and palatable alternatives that will provide the east/west mobility the MTA seeks. 11

Thank you so much for your consideration of this matter.

Very truly yours,

Geoffrey M. Ely, President

BUS RIDERS UNION Sindicato De Pasajeros
Center•3780 Wilshire Blvd.•Suite 1200•Los Angeles, CA 90010•(213) 387-2800•fax: (213) 387-3500•laborctr@igc.apc.org•www.igc.org/lctr

JUN 18 2001

June 15, 2001

SCANNED
IN RMC

Mr. David Mieger
Los Angeles County Metropolitan
Transportation Authority
One Gateway Plaza
MS 99-22-5
Los Angeles, CA 90012

Dear Mr. Mieger:

We are writing to urge the MTA Board of Directors to reject the Mid-City/ Westside Corridor Draft Environmental Impact Statement and the Environmental Impact Report. The Bus Riders Union opposes the proposed Mid-City/ Westside Corridor project because the project violates the Consent Decree's mandate to 'oritize the improvement and expansion of the existing bus system and because the project does not 'oritize the needs of the transit dependent. The following are specific concerns raised by the Draft SEIS/)R itself: 1

1 **Draft EIS/ EIR includes no alternative to the proposed Bus Rapid Transit or Bus Rapid Transit/ Light Rail Transit Alternatives.** The Draft EIS/ EIR studies only the impact of the Bus Rapid Transit and Light Rail Transit option and includes no study of cheaper, more efficient, alternative options such as the possibility of dramatically increasing bus service in the corridor and region. The Draft EIS/ EIR compares the BRT or BRT/ LRT option only to the no-Build alternative, an option that would mean making no transportation improvements in the corridor and region. There is a need for a new Draft EIS/ EIR that studies low-cost alternatives such as a program that includes the full implementation of Rapid Bus, the introduction of MTA community shuttles and circulators, the creation of a freeway bus network throughout the region, and the purchase of expansion buses to comply with load factor deadlines agreed upon in the Consent Decree. 2

2 **Draft EIS/ EIR is a high-cost, low-benefit fixed guideway project that increases the inequity of subsidies for "new transit riders" over the needs of the transit dependent.** The Draft EIS/ EIR calculates that an important component for building and operating the BRT or BRT/ LRT alternatives is the factor called the Cost per New Transit Rider – which calculates the annualized cost to build and operate the project in comparison to the projected number of new transit riders. The Draft EIS/ EIR defines the new transit rider as a person who is attracted to ride public transit instead of driving a car as a result of the new project. The amount of subsidy for this project for the relatively low ridership expectation is a clear violation of Consent Decree provision that states that MTA will ensure an equal and equitable transit access to the transit dependent . The subsidy costs are alarming for Alternative 1 (Wilshire BRT): the projected cost to attract 12, 200 new daily transit riders will be $9.00 per rider. The figures are much higher for Alternative 3 (Wilshire BRT and Exposition LRT): 3

the projected cost to attract new riders will be at $12.80 per rider. If we were to compare the amount of these proposed subsidy per new riders to the amount of subsidies a passenger receives on the Vermont bus lines which ranges between .33 cents and $1.39 per passenger, we see the clear inequity. 3

3 **Draft EIS/ EIR demonstrates the low ridership numbers that will be generated by the BRT or BRT/ LRT in comparison to less costly options, such as Rapid Bus.** The Draft EIS/ EIR predicts a ridership between 39, 600 to 83, 900 (former for only Wilshire BRT option and latter for Wilshire BRT/ Expo LRT full length), predicting only 12, 200 to 27, 200 new daily rides. Such numbers can not possible justify the exuberant cost of $304 million for Wilshire BRT only or the extremely high cost of $ 858 million for the Wilshire BRT/ Expo LRT, when this is compared to the first two Rapid Bus Lines that have generated 20, 000 new daily passenger trips (roughly 10, 000 new daily riders) at a fraction of the cost of the BRT or BRT/ LRT. 4

4 **Draft EIS/ EIR does not genuinely address questions transportation equity and compliance with Title VI.** In its section "Mobility of Transit Dependents", the Draft EIS/ EIR suggests that because the eastern portion of both the Wilshire BRT route and Exposition routes pass through areas of Mid City and South Los Angeles, communities that are predominantly of color with a high percentage of auto-less households, the BRT or BRT/ LRT would increase the level of transit service by reducing travel time and increase greater accessibility for the transit dependent. Given that the BRT or BRT/ LRT projects goes through minority communities, it follows that those who will use it will be largely minorities and transit dependent. However, that does not mean that the BRT or BRT/ LRT will be an overall transportation improvement for minority communities, rather it means that transit dependent passengers in a region as undeserved as the studied corridor will use whatever form of transportation is available to them. The Draft EIS/ EIR should include a study that compares the increased service rendered to minority communities through much less costly increased Rapid Bus and other bus service improvements, not offered by the high cost fixed transit ways proposed by BRT or BRT/ LRT. Further, the Draft EIS/ EIR omits that the MTA is obligated by a signed consent decree to bring about transit equity through the meeting of bus overcrowding reduction deadlines and through expansion of county-wide bus service, a process that will be undermined if its necessary funds are used to build the proposed BRT or BRT/ LRT. 5

5 **Draft EIS/ EIR shows that BRT/ LRT will not significantly reduce traffic and circulation travel time.** In its section "Traffic and Circulation", the Draft EIS/ EIR show relatively insignificant travel time reductions that would result in Highway Performance for vehicle speed trips throughout LA County, even though the logic for the construction of the BRT and BRT/ LRT is to attract new transit riders who will leave their cars at home – ostensibly less cars, more speed. All options either show a very slight decrease or increase of .01 mph due to reduced number of cars on the highway. 6

For these reasons, we urge the board to reject the proposed Mid-City/ Westside Corridor Draft EIS/ EIR and send its contents back to MTA staff until the above concerns can be addressed in the document. 7

Sincerely,

Eric Mann,
Bus Riders Union Planning Committee

Manuel Criollo
Bus Riders Union Planning Committee

cc: MTA Board Members

CCALA (1)

OFFICERS
Dr. Thomas Morse, Chair, University of Southern California
John Whitaker, First Vice Chair, Pillsbury Winthrop LLP
George L. Mister, Second Vice Chair, Greer/Dailey/Mister
Diane Cameron, Treasurer, System Property Development
Lora Watts, Secretary, Pacific Bell
Lucinda Starrett, Immediate Past Chair, Latham & Watkins
Carol E. Schatz, President & CEO, Central City Association

CCA
THE VOICE FOR DOWNTOWN

VICECHAIRS
AC Martin Partners
Alameda Produce Market
Arthur Andersen, LLP
AT&T Wireless
Bank of America
bp Amoco
The Capital Group Companies, Inc.
Catellus Development
Center Trust
Cushman Realty Corp.
Department of Water & Power
Downtown News
Downtown Properties
FIDM
Feldmann-Hillard, Inc.
Forest City Developments
The Gas Company
Gibson, Dunn & Crutcher LLP
Horn Investment Group
IBM
IKON Office Solutions
Jones Wingfield
Illig Construction
Kiewit Company of America
L.A. Convention & Visitors Bureau
Lend Lease Real Estate Investments
Lennar Communities
Los Angeles Athletic Club
Los Angeles Center Studios
Los Dodgers
Los Angeles Times
MAS Asset Management
Maguire Partners
Majestic Realty
Manatt, Phelps, & Phillips
Marion, Brown & Plass
Metropolitan Water District
Motion Picture Association of America
Munger, Tolles & Olson
O'Melveny & Myers
Orrick, Herrington & Sutcliffe
Parsons Brinckerhoff/P&C
Paul, Hastings, Janofsky, & Walker
RCN Telecom Services
Riordan & McKinzie
SRO Housing Corporation
Sanwa Bank
Shoenberg Group
Sheppard, Mullin, Richter & Hampton
Shorenstein Investments
Sidley & Austin
The Sierra Group
Staples Center/LA Arena Company
Transwell Crow Company
Transamerica
TriamHahn
UNS Corp.
U. S. Trust Company
University of Southern California
Urban Partners
Walt Disney Company
Wells Fargo
Zurich Bank
Westin Bonaventure Hotel & Suites
Weston, Benshoof, Rochefort, Rubalcava, MacCuish, LLP
Wilshire Grand Hotel & Centre

Supervisor Yvonne Brathwaite Burke
Chair
Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, California 90012

CENTRAL CITY ASSOCIATION *of* Los Angeles

Dear Supervisor Burke:

The Central City Association, which represents 300 businesses employing over 250,000 workers in Los Angeles County has reviewed the Mid-City Westside Transit Corridor Draft EIS/EIR. While CCA supports the Transit Corridor and applaudes MTA's efforts to improve public transportation between Downtown and West Los Angeles, we respectfully request significant changes to the current draft. 1 2

When the MTA board authorized preparation of the draft EIS/EIR, they directed that a subway tunnel design option be considered along Exposition Boulevard between the 110 Freeway and Vermont Avenue. The direction to consider a tunnel was provided at the request of the University of Southern California and the Exposition Park entities. The draft EIS/EIR includes reference to the tunnel design option only to the extent that it indicates that it was determined that at-grade alignment would not result in impacts requiring tunneling. The tunnel design option was not included as an alternative in the draft EIS/EIR. 3

CCA believes that the tunnel design option is most appropriate for the sensitive adjacent land uses, including school, park, university, and cultural and educational facilities. Therefore, we request the following: 4

- That the MTA Board direct a complete study of the tunnel design option and inclusion of the tunnel option as an alternative in the final EIS/EIR.
- That the MTA not consider the use of Exposition Boulevard and Figueroa Street as a primary route of Bus Rapid Transit (BRT)
- That MTA study Martin Luther King Boulevard and Hill Street as a primary BRT route.

Thank you for your consideration of this matter. If you have any questions, please feel free to call CCA's Director of Legislative Affairs, Hilary Norton Orozco at (213) 624-1213 ext. 217. 5

Sincerely,

Carol

Carol E. Schatz
President and CEO

TEL: (213) 624-1213 FAX: (213) 624-0858
606 South Olive Street, Suite 1000, Los Angeles, California 90014

CEN(1)

NEIGHBORS FOR AN IMPROVED COMMUNITY
458 East 32nd Street
Los Angeles, CA 90011
323/231-4532

June 26, 2001

TO LACMTA BOARD MEMBERS:

Neighbors For an Improved Community ("Neighbors") was formed in June of 2000 by residents, parents, block clubs, and churches in response to the increasing development by the Fashion District, Los Angeles Unified School District ("LAUSD"), University of Southern California ("USC"), the Staples Center, and Los Angeles County Metropolitan Transportation Authority ("MTA") in our community. 1

All of these entities are undergoing some form of growth and expansion and do so without taking into account the residents who have lived in this community for many, many years. The need for representation, preservation of housing, and participation in OUR DESTINY as a community was and is the basis for forming *Neighbors*.

OUTLINED BELOW ARE OUR CONCERNS REGARDING MTA'S PLANS FOR THE EXPOSITION LINE, INCLUDING: (1) THE NON-REVENUE CONNECTOR LINE BETWEEN MAIN STREET AND LONG BEACH BOULEVARD; (2) LACK OF NOTIFICATION IN OUR COMMUNITY; AND (3) INADEQUACY OF THE ENVIRONMENTAL IMPACT REVIEW PROCESS. THESE ARE DETAILED BELOW.

PROBLEMS WITH THE CONNECTOR LINE

Our PRINCIPAL concern with the Los Angeles County Metropolitan Transportation Authority's ("MTA") PLANS FOR THE EXPOSITION LIGHT RAIL TRANSIT is the addition of the non-revenue connector line, which will ultimately become a revenue, passenger train to connect to the Blue Line east of Main Street to Long Beach Boulevard. OUR ALTERNATE PROPOSAL IS OUTLINED BELOW. 2 3

The present proposal of using the old right-of-way from Main Street to Long Beach Boulevard is inappropriate because: 4

- it disrupts the community;
- runs behind hundreds of homes;
- is less than half a block from 28th Street Elementary School;
- will cause the closure of vital streets in our community;

- will prove hazardous to the many, many adults, elderly, and children who daily walk across these rails and streets; and

- will NOT serve the greater population nor will it meet the transportation needs of this community.

LACK OF NOTIFICATION

ADDITIONALLY, WE ARE CONCERNED THAT Our community was totally ignored by THE MTA DURING A CRITICAL STAGE OF THIS PROCESS. Absolutely no notification, involvement, or outreach was undertaken by MTA to contact residents living east of La Brea to Long Beach Boulevard. As a group of concerned residents, we have been alarmed about the proposed connector track since we first learned of it months ago when we tried to obtain the MTA right-of-way property for neighborhood park space. Our community was denied participation in the decision-making process totally ignoring all federal laws mandating that minority, low-income communities be notified from the very inception of a project such as this. 5

INADEQUACY OF THE ENVIRONMENTAL IMPACT

Complete and thorough environmental studies have not been made with regard to our community regarding the effects of noise and vibration impacts, the disruption of the quality of life, the safety hazards of light rail in a densely populated community nor has the MTA thoroughly studied the environmental impact the maintenance yard will have on the surrounding residential community. 6

It has become extremely obvious that South Central and East Los Angeles were not part of the concerns for developing this planned Exposition Line. The same importance in environmental studies, involvement of communities, safety, quality of life, or transportation needs were never a consideration of the MTA for our low-income, minority community. 7 8

There are **two** trains running east to west -- one on Washington Boulevard and the other on Imperial Highway. The proposed non-revenue connector train, which will ultimately become a revenue, passenger train, will run parallel to the Washington Boulevard Blue Line only a mile away, and we believe that this is not a valuable use of the MTA's resources nor will it fulfill the transportation needs of this community. 9

We propose a light rail train coming off Exposition Boulevard on Jefferson and Broadway, turning south on Broadway to either Slauson or Florence, turning east on either Slauson or Florence to connect to the Blue Line on Long Beach Boulevard. 10

MTA will be making an investment in our community. This investment should in no way harm the community but should make it better. In order for the investment to reap benefits for both the MTA and the community, we ask that MTA commit to: 11

- no homes will be destroyed until replacement homes have been built – a house for a house; 12

- local hiring and training for community residents;

- area around tracks, train stations to be landscaped – neighborhood should look better;

- create economic development;

WE HOPE THAT YOU WILL TAKE SERIOUSLY OUR COMMENTS, AND CONSIDER THIS REVISED ROUTE, WHICH WOULD BETTER serve the transportation needs of the community and promote economic development in an area so desperately in need of economic development. 13

Very truly yours,

NEIGHBORS FOR AN IMPROVED COMMUNITY

Cecilia Nunez

Cecilia Nunez

California Science Center

700 State Drive, Los Angeles, CA 90037
Telephone 323.SCIENCE (724.3623)
Fax 213.744.2034

April 25, 2001

MEMO TO: Board of Directors

FROM: Jeffrey N. Rudolph

Shirley Kelley

SUBJECT: Draft Environmental Impact Statement/Environmental Impact Report (DEIS/EIR) on the Mid-City/Westside Transit Corridor

The Metropolitan Transportation Authority has released a Draft Environmental Impact Statement/Environmental Impact Report (DEIS/EIR) on the Mid-City/Westside Transit Corridor. 1

Comments may be provided at public hearings on: May 7, May 9 or May 15. Written comments may be submitted through June 15. 2

The DESI/EIR considers the following project alternatives:

- No project
- Transportation System Management
- Wilshire Boulevard Bus Rapid Transit
- Wilshire Bus Rapid Transit and Exposition Bus Rapid Transit
- Wilshire Bus Rapid Transit and Exposition Light Rail Transit

3

When the MTA Board authorized preparation of the DEIS/EIR, they directed that a subway tunnel design option be considered along Exposition Boulevard between Figueroa Street and Vermont Avenue. The direction to consider a tunnel was provided at the request of the University of Southern California and the Exposition Park entities. The DEIS/EIR includes reference to the tunnel design option only to the extent that it indicates that it was determined that at-grade alignment would not result in impacts requiring tunneling. The tunnel design option was not included as an alternative in the DEIS/EIR. 4

The DESI/EIR indicates that sound walls and fencing would be installed along segments of the Bus Rail or Light Rail project along Exposition Boulevard. The report does not specify the design or location of such sound walls or fences. However, it does suggest that the noise impact of bus transit vehicles would require construction of sound walls in 5

segments of the route adjacent to sensitive land uses, such as schools and parks. The report noted that due to the location of exhaust pipes on buses, the sound walls may need to be up to 12 feet in height. Sound walls of 4' to 8' may be necessary for light rail. In addition, the study noted that concern with hazards to pedestrians or motorists may require installation of crossing gates where bus or rail transit operates at over 35 mph. It specifically notes that pedestrian crossing gates will be installed near schools and possibly at parks. 5

Recommendation:

We recommend that the Board:

- adopt a position requesting the MTA Board to direct a complete study of the tunnel design option and inclusion of the tunnel design option as an alternative in the EIS/EIR; 6
- go on record in support of the tunnel design option as the most appropriate for the sensitive adjacent land uses (school, park, university, and cultural and educational facilities); 7
- oppose construction of any sound walls, crossing gates or other barriers that would create significant visual barriers to Exposition Park and to the University of Southern California. 8

We do not recommend that the Board adopt a position opposing at-grade light rail as we believe that transit service to Exposition Park and the entities in the Park is important to solving our traffic, parking, and circulation concerns. A position in opposition to the project may result in a MTA decision to only proceed with the Wilshire Bus Rapid Transit project and provide no transit service to Exposition Park. 9

CWTS (-)

CTS CON-WAY TRANSPORTATION SERVICES
A CNF COMPANY

RODERICK J. FRACASSI
Counsel

June 14, 2001

Mr. Ervin Poka
Federal Transit Administration
Metropolitan Office
201 N. Figueroa Street, Suite 1460
Los Angeles, CA 90012

Mr. David Mieger
Los Angeles County Metropolitan
Transportation Authority
One Gateway Plaza
MS 99-22-5
Los Angeles, CA 90012

Mr. Raymond Sukys
Federal Transit Administration
201 Mission Street, Room 2210
San Francisco, CA 94105

Re: Draft Environmental Impact Statement (DEIS)
Draft Environmental Impact Report (DEIR)
Mid-City/Westside Transit Corridor Improvements

Dear Mr. Messrs:

With regard to the above caption matter, I am in receipt of the MTA's combined DEIS and DEIR, which discusses the impact of possible site locations currently being considered by the MTA. This report identifies nine properties as alternative locations for a new bus maintenance and storage facility. One of these sites, located in the City of Vernon, on the Northeast corner of Alameda and Washington, identified in your report as location #6, is owned by Con-Way Transportation Services, Inc., and operated by its subsidiary Con-Way Western Express, collectively referred hereinafter referred to as "Con-Way". Please allow this letter to serve as Con-Way's public comment in our

110 PARKLAND PLAZA, ANN ARBOR, MI 48103
(734)769-0203 (734)214-5651 FAX www.con-way.com

strenuous opposition to the possible selection of our service center as the location selected for the proposed MTA facility.

Con-Way Western Express (CWX) is headquartered at 6301 Beach Boulevard in Buena Park, and is a major operating component of Con-Way Transportation Services, Inc., which is located at 110 Parkland Plaza, in Ann Arbor, Michigan. CWX is a business-to-business regional less-than-truckload motor carrier specializing in next and second-day services in the western United States for commercial and industrial less-than-truckload (LTL) freight. CWX operates 83 service centers with direct service to more than 15,000 cities and communities throughout California, Nevada, Arizona, New Mexico, Montana, Colorado, Utah, Idaho, Oregon, Washington, Wyoming, Hawaii, Alaska, as well as Mexico. CWX also provides extensive inter-regional and transcontinental service throughout North America in a fully integrated national network with Con-Way Central Express, Con-Way Southern Express and Con-Way Canada Express. CWX has approximately 2,900 employees, of which over 1900 of them are employed in the State of California, with the Vernon service center employing 83 CWX employees. 2

The Vernon service center, which is being considered by the MTA is a critical terminal within Con-Way's overall transportation network, and given its strategic location, the improvements to the facility and other economic consideration, cannot be easily replaced under any circumstances. The site houses over 100 pieces of equipment, utilized to transport approximately 600,000 pounds of freight **per day,** much of it critical to local businesses. The service center is responsible for pick-ups and deliveries throughout the Los Angeles area, as well as all of California. The site was purchased in 1997 and Con-Way has expensed substantial dollars in the restoration and maintenance of this service center. 3

In reference to the submitted report, Con-Way is not prepared to debate the specific conclusions presented by the MTA, as they go beyond the scope of our current 4

involvement. However, Con-Way wants to assure the Authority that this site is a necessary part of our business operations, and the loss of the site would have a significant adverse effect on our current level of service and productivity. Therefore, Con-Way shall continue to participate in the selection process to oppose any consideration by the MTA for the taking of this location. 4

Thank you for your attention to this matter. All future correspondences should be directed to my attention at the address and telephone number shown below. 5

Sincerely,

Roderick J. Fracassi

cc: John Labrie, Vice President of Operations – CWX
William Taylor, Esq., Hanson Bridgett

JUN 18 2001

SCANNED
IN RMC

D. A. R. A.
Downtown Area Residents' Association

14 June, 2001

Mr. David Mieger, Project Manager
Los Angeles County MTA
One Gateway Plaza
Mail Stop 99-22-5
Los Angeles, CA 90012

Re: Draft EIS/EIR for Mid-City/Westside Transit Corridor Study

Dear Sir:

1. Our organization shares a concern that is widespread in the City of Santa Monica that removal of on-street parking along Wilshire Boulevard in our City as part of this project would be extremely negative for the economic health of our City and for the daily activities of our residents, visitors and business. 1

2. The possible addition of Light Rail along the Exposition Corridor is interesting and could be attractive. However, the notoriously dismal past record of MTA that led to voter defunding of the conceptually attractive subway project makes us hesitant to give outright endorsement to any large (and expensive) program under MTA. 2

3. It is notable that the "No Project" alternative was essentially eliminated from discussion in the Executive Summary of the Draft EIS/EIR that was provided to us--and presumably to others. While there may be adequate reasons for proceeding with a Mid-City/Westside Transit project, this omission detracts from the credibility of MTA's analysis and presentation--and MTA's credibility, as demonstrated by Proposition A's passage in 1998, is virtually nil. Moreover, many critical statements in this presentation are virtually unsupported assertions. 3

4. Therefore, to our regret, we cannot fully endorse any alternative presented in the Draft EIS/EIR, but we repeat our concern that whatever project is eventually decided upon should not remove on-street parking along Wilshire Boulevard, which is vital to the daily life and economic health of much of Santa Monica. 4

Sincerely,

Arthur Harris, Chairman (and for the Board)
The Downtown Area Residents' Association

1431 Ocean Avenue #309 Santa Monica, CA 90401

FCP(1)

Figueroa Corridor Partnership

April 27, 2001

The Honorable Yvonne Brathwaite Burke
Chairperson
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

RE: Mid-City Westside Transit Corridor Draft EIS/EIR

Dear Madame Chair:

The Figueroa Corridor Partnership, a business improvement district comprised of 107 property owners in the Figueroa Street, Flower Street, and Exposition Boulevard corridors, including major public and private museums, colleges and universities, and religious organizations, has reviewed the Mid-City Westside Transit Corridor Draft EIS/EIR, specifically the sections dealing with the utilization of Exposition Boulevard and the Figueroa Corridor. After considerable discussion, the Board of Directors voted to oppose proposed alternatives 2, 2A, 3 and 3A, presented in the draft EIS/EIR. 1 2

The Figueroa Corridor Partnership recognizes the need to improve transit in our region and encourage continued efforts towards that goal. However, the Figueroa corridor and Exposition corridor have historically shouldered more transportation impacts than probably any region in the county of Los Angeles. These include the construction of the Harbor Freeway in the 1940s and 1950s, the construction of the Santa Monica Freeway in the 1960s, and the development of the 110 Transitway in the 1990s. All of these developments, while worthwhile and important transportation improvements, nonetheless have had a negative impact on businesses, property owners, institutions and residents in our neighborhoods. The alternatives suggested in the DRAFT EIS/ERA for both Exposition Boulevard and Figueroa Street would represent still more negative aspects, which in the view of the Figueroa Corridor Partnership, are unacceptable. 3

Of particular concern, the Draft EIS/EIR did not seriously consider a below grade option along Exposition Boulevard between Vermont Avenue and the 110 Freeway as was suggested by several major stakeholders. For safety reasons (two deaths alone at Figueroa and Exposition in 2000), it would be important to review present and future traffic impacts at Exposition Boulevard and Figueroa Street, and Exposition and Vermont Avenue. We cite these intersections as the EIS/EIR failed to recognize the following: 4

--the pending construction of a LAUSD K-5 school to be built in Exposition Park at the corner of Figueroa and Exposition. 5

3982 South Figueroa Street,
Suite 207
Los Angeles, California 90037
tel 213.746.9577
fax 213.746.7876

The Figueroa Corridor Partnership is responsible for the daily management and promotion of the Figueroa/Flower Corridor, linking downtown Los Angeles to Expositions Park. The Partnership is committed to its' development as a safe, clean, economically vibrant and aesthetically pleasing environment in which to conduct business, continue an education, visit a museum, attend a sporting event, worship or reside.

–the AM Peak Level of Service (LOS) rating of "F"("Failure-Tremendous delays with continuously increasing queue lengths") for Figueroa at Exposition (also cited in the October 1992 EIR of the Proposed Exposition Park Branch Line–Table 5.3-4: No Project AM and PM Levels of Service). 6

–the USC Federal Credit Union will build a major facility at Flower and 37th Streets, just south of Exposition. 7

–the existing Los Angeles Child Guidance Clinic on Vermont just south of Exposition. 8

–the soon to be dedicated 130,000 square foot Los Angeles County Public Social Services Building at Vermont and 39th Street just south of Exposition. 9

–the soon to be developed 140 senior citizen units, also on Vermont just south of Exposition. 10

Stakeholders in Exposition Park and at USC cite the importance of not separating the park from the campus with a forbidding transit program. Present and future faculty-museum appointments and other collaborations for the free-flow of programs, classes, student interaction, security, infrastructure, parking, etc., would be hampered by expanded transit on Exposition Boulevard. Furthermore, the connection of Exposition Park and University Park represents one of the few accessible and open green spaces in the central city. 11

Also of concern, utilizing Figueroa Street for use of a proposed Bus Rapid Transit line would hinder any thought of new development along the Figueroa Corridor (Figueroa was widened as part of the 110 Transitway to become a freeway alternate and was never returned to normal street width). By default, Figueroa Street continues to be viewed as an alternate freeway by the Los Angeles Department of Transportation and Caltrans. In fact, signs are posted "Freeway Alternate" in several locations near USC and Exposition Park. The suggestion to increase traffic with the addition of articulated buses that might arrive every one and one half minutes in each direction in rush hour as represented by MTA consultants would overburden this already heavily used street. 12

For these reasons, the Figueroa Corridor Partnership rejects alternatives 2, 2A, 3, and 3A in the Mid-City/Westside Transit Corridor Draft EIS/EIR. We encourage you to reconsider the below grade option rail alternative near Exposition/USC. We also encourage you to review and reconsider the Martin Luther King Boulevard Bus Rapid Transit option previously recommended by stakeholders and studied by MTA 13

staff which would accomplish all that is suggested by Alternative 2 (and 2A), but would also serve Exposition Park/USC while not negatively impacting the Exposition and Figueroa corridors. We also suggest utilizing Hill Street as the north/south connection to the MLK route.

Sincerely,

Darryl Holter
Chairman
Figueroa Corridor Partnership

A. Bingham Cherrie
Vice Chairman
Figueroa Corridor Partnership

cc: MTA Board Members:
Michael Antonovich
Hal Bernson
John Fasano
Don Knabe
Jose' Legaspi
Gloria Molina
Beatrice Proo
Richard Riordan
Frank C. Roberts
Jeffrey Walden
Zev Yaroslavsky

Councilpersons:
Mark Ridley-Thomas, Eighth District
Rita Walters, Ninth District

Assemblyman Roderick Wright

State Senator Kevin Murray

FET (1)

Response to MTA Mid-City/Westside Draft EIS/EIR

Darrell Clarke
Co-Chair

Friends 4 Expo Transit
P.O. Box 64943, Los Angeles, CA 90064
310-393-9025 fax 310-393-9810
friends4expo@aol.com
www.friends4expo.org

June 15, 2001

Summary

Ridership and Speed

	Weekday Boardings	*Ocean Ave. – Flower St. – p.m.*
Expo Light Rail	51,400	:42
Expo BRT	~20,000*	~:60*
Metro Rapid 720 (April 2001)	28,200	1:24
Wilshire BRT (with Expo LRT)	32,500	:58-:60

Source: DEIS/EIR; BRT corrected*; Long Beach Blue Line = 62,850 (April 2001)

Dense Corridor Population, Employment, and Recreation – denser even than the Long Beach Blue Line corridor (most successful light rail line in U.S.); over twice other successful light rail systems (2000 U.S. Census)

2000 Population/Square Mile	*Within ½ mile*	*Within 2 miles*	*Minority 2 miles*
Exposition	12,200	13,300	75%
Long Beach Blue Line	12,000	12,600	92%
San Diego	6,800	6,100	61%
Portland	5,300	4,800	23%

Capacity – three times Metro Rapid 720 buses

	Seats/hour
Light Rail – 2-car trains @ 5 minutes	1,824
Light Rail – 3-car trains	2,736
Metro Rapid 720 @ 4 minutes	600
Metro Rapid with 60-foot articulated buses	900

Lower Operating Cost

MTA FY 2001	*Operating Cost per Passenger Mile*
Light Rail	$ .33
Bus	$ .51

Broad and growing popular support for light rail, not busways

Westside connection to emerging L.A. rail network — Valley, Long Beach, Pasadena, Eastside

Quality of life – better communities and alternative to traffic gridlock

* A basic flaw in the Draft EIS/EIR for Exposition BRT distorts the projected ridership and costs. Estimates of 47-minute travel time (39 skip-stop) assume signal priority that is not possible with planned bus frequency, and 55 mph speed not compatible with grade crossing safety. Projected ridership (29,000) is therefore overstated and costs per passenger understated.

Detailed Comments

Alternative 3/3A – Exposition Light Rail (LRT)

Speed

The 42-minute projected running time from Santa Monica to downtown Los Angeles is consistent with current Long Beach Blue Line schedule speeds. (Table 5-6, page 5-12) Following is a breakdown by section; note this includes an added station at 14th Street:

Expo LRT	Miles	Max MPH	Stops	Avg. MPH	Minutes
Flower & 7th			1		
Flower & Washington	1.4	35	2	17	4.9
Flower & Expo	1.5	35	1	22	4.2
Expo & Arlington	2.2	35	2	22	5.9
Expo & Crenshaw	1.0	55	1	30	2.0
Expo & La Brea	1.2	55	1	30	2.4
Expo & La Cienega	1.0	55	1	30	2.0
Expo & Venice	1.0	55	1	30	2.1
Venice & Sepulveda	1.9	35	2	22	5.1
Expo & Sepulveda	1.9	35	1	22	5.2
Olympic & Cloverfield	2.2	55	3	30	4.5
Olympic & 11th	1.0	35	1	22	2.7
Ocean	0.7	55	1	30	1.4
Total	**17.1**		18	24.1	**42.4**

Notes: Reducing speed between Crenshaw and La Brea to 35 mph would add about one minute (0.9). And total time would be about five minutes faster (one mile shorter) without the Venice-Sepulveda detour:

Expo LRT - no detour	Miles	Max MPH	Stops	Avg. MPH	Minutes
Flower & 7th			1		
Flower & Washington	1.4	35	2	17	4.9
Flower & Expo	1.5	35	1	22	4.2
Expo & Arlington	2.2	35	2	22	5.9
Expo & Crenshaw	1.0	55	1	30	2.0
Expo & La Brea	1.2	55	1	30	2.4
Expo & La Cienega	1.0	55	1	30	2.0
Expo & Venice	1.0	55	1	30	2.1
Expo & Motor	1.2	55	1	30	2.4
Expo & Sepulveda	1.5	35	0	30	3.1
Olympic & Cloverfield	2.2	55	3	30	4.5
Olympic & 11th	1.0	35	1	22	2.7
Ocean	0.7	55	1	30	1.4
Total	**16.0**		16	25.6	**37.6**

Ridership

The projected 51,400 weekday boardings is consistent with current (April 2001) ridership of 63,000 on the longer (22 vs. 17-mile) Long Beach Blue Line. (Table 5-5, page 5-11) 10

Two other light rail comparables are Portland at 71,100 and San Diego at 82,600 (totals of two lines each; APTA 4Q 2000). Both cities have less than half the population density of the Exposition corridor (13,300 people / square mile within 2 miles – 2000 Census). 11

Capital Cost

The projected $650 million cost – $41 million per mile – is consistent with other recent light rail construction (Table 5-1F, page 5-5): 12

Pasadena Blue Line	$50 million/mile
San Diego Mission Valley West	$37 million/mile
San Jose Tasman West	$43 million/mile
Salt Lake City	$21 million/mile
Denver	$20 million/mile

Operating Cost

The projected $0.32 per passenger mile system operating cost is consistent with current MTA light rail operating costs. (Table 5-13, page 5-16) 13

Light rail's lower operating costs – 2/3 that of buses – can make a significant contribution to reducing overall operating costs. 14

MTA FY 2001	*Operating Cost per Passenger Mile*
Light Rail	$ .33
Bus	$ .51

Capacity

Light rail has three times the capacity of Metro Rapid 720 buses: 15

	Seats/hour
Light Rail – 2-car trains @ 5 minutes	1824
Light Rail – 3-car trains	2736
Metro Rapid 720 @ 4 minutes	600
Metro Rapid with 60-foot articulated buses	900

Environmental Benefits

LRT is better than BRT in all but one criterion, where it still equals a busway (PM10 comes from diesel engines, and none are involved here). (pages 3.8B-21 and 24)

	Alt. 2 BRT	Alt. 3 LRT	
VMT	- 0.03%	- 0.04%	(33% better)
CO	- 0.03%	- 0.04%	(33% better)
NOx	- 0.004%	- 0.05%	(1100% better)
ROG	+ 0.02%	- 0.04%	(better vs. worse)
PM10	- 0.03%	- 0.03%	(same)

Key: Vehicle Miles Traveled; Carbon Monoxide; Nitrogen Oxides; Reactive Organic Gasses; Particulates 10 Microns. 16

Air pollution benefits are shown as a percentage of the entire air basin. One would expect the benefits within the transit corridor to be much more pronounced, and that this should be documented in the DEIS. 17

Neighborhood Considerations –Traffic, Noise, Safety

In general the DEIS/EIR has provided appropriate consideration for the neighborhoods LRT would pass through. The grade separations proposed are all necessary.

Following are some additional neighborhood-specific recommendations from our contacts with people and community groups along the route, providing additional detail to what is presented in pages 3.2-59 – 62, 3.9-17 – 19, and 3.14-10 – 12. 18

Exposition Boulevard west of Crenshaw Boulevard

Parents at Dorsey High School emphasized to us that they drive south along Farmdale Avenue to drop off children in the morning and pick them up in the afternoon. Cars are backed up as far north as Jefferson Boulevard. A grade crossing at Farmdale would obviously present a problem. And of course there is heavy pedestrian activity on Farmdale at these times. 19

The orientation of homes facing the right-of-way across Exposition Boulevard allows no feasible noise mitigation for the train horns and crossing bells that would be required for 55 mph grade crossings at Buckingham and Farmdale Avenues. 20

Further study with this neighborhood is necessary. Thirty-five mph operation without horns or grade separation are preferable for handling these street crossings. 21

National Boulevard at Hayden Avenue

A 35 mph median alignment on National Boulevard would present less sound and vibration to houses on the north side of National Boulevard, as well as open up the park and bikeway and ease pedestrian crossings. It would also facilitate a station at Hayden Avenue. 22 23

However, the Culver City General Plan calls for no light rail grade crossings in Culver City, which would require the DEIS/EIR alignment on the north side of National Boulevard. 24

Venice and Sepulveda Boulevards

The DEIS/EIR suggests removing one of three traffic lanes in each direction along Venice Boulevard (page 2-37). It should be possible to retain all three lanes by narrowing the very wide parkways (typically 20 feet total of sidewalk + parkway). The section from Robertson Boulevard to west of Culver Boulevard has a narrower right-of-way, however, and may not be possible to keep all traffic lanes. But removal of a traffic lane here would exacerbate already heavy traffic and many left turns. 25

It is possible to run light rail tracks while retaining the two traffic lanes in each direction and 70% of the 526 street parking spaces on Sepulveda Boulevard (page 3.3-11), but this would be a tight squeeze on the 100-foot-wide right of way. Sidewalk + parkway width would be reduced from 13 feet to 8 feet. All of the existing mature street trees (magnolias) along the UCLA housing and north of the Santa Monica Freeway (palms and jacarandas) would be cut down (this does not appear to be noted in the DEIS/EIR). Traffic at Venice, Palms, National, and Pico Boulevards – all p.m. LOS F – would be impacted (Table 3.2-32, page 3.2-94). 26

Culver City, Westside Village, and other communities have requested that the MTA also study a direct route along the right-of-way in this DEIS/EIR. Substantial mitigation could be provided from Overland Avenue to Sepulveda Boulevard for less than the detour would cost. 27

Santa Monica

An LRT station should be added at about 14th Street and Olympic Boulevard, to serve Santa Monica College, UCLA/Santa Monica Hospital, and the many other business destinations and multifamily housing in this part of Santa Monica. Not only is this particular station location very justified, the 1.5-mile distance from Cloverfield to Ocean Avenue is greater than typical station spacing. 28

The success of Bergamot Station as an arts center in Santa Monica necessitates an alternative to the large surface parking lot described in the DEIS/EIR. The land values that justify multi-level subterranean parking structures in this district demonstrate that parking for this station should also be structured. They also show a need to control potential use of this light rail parking by people driving to local businesses seeking cheaper parking. 29

A potential alternative to the elevated structure from 11th Street to Main Street could pass *under* the Lincoln Boulevard bridge over the Santa Monica Freeway. There is enough unused space on the north side of the freeway (provided for a widening that will not occur) for a double track to fit. This could both save money and avoid the visual impact of LRT bridging over Lincoln Boulevard. 30

Alternative 2/2A – Exposition Busway (BRT)

Speed

The 47-minute and 39 minute skip-stop projected running times for Exposition BRT are unattainable. A more likely time would be around an hour. 31

- This travel time model assumes a speed of 45 mph between Vermont and Western for regular BRT (Technical Appendix Figure 2) and 55 mph for skip-stop (Figure 3). Neither are safe or possible in this 35 mph boulevard median. 32

- It assumes 55 mph operation on the exclusive right-of-way sections. Yet the DEIS seriously questions whether this is possible: 33

  > The use of gates at BRT crossings has not been attempted to date, and may require special legislation. If a practicable solution for the detection of buses and the use of automatic gates at BRT grade crossings cannot be developed, the maximum operating speed through an un-gated intersection is based on the current California regulations governing highway-LRT at grade crossings. (page 2-28) 34

  > The use of gates at BRT crossings has not been attempted in the U.S. and would require special legislation in order to install such devices at locations where gates do not exist. In addition, because of the relatively short headways between buses, the use of gates may not be an appropriate solution. Current rail standards require a minimum of 20 seconds between the time flashing lights / gates is activated, and the time the train reaches the crossing. With short headways as the rapid bus approach downtown Los Angeles, the gate down time may cause high levels of delay for cross street traffic. (page 3.2-59) 35

  In other words, we should assume that buses will be limited to 35 mph on the entire route. 36

- It assumes BRT dedicated lanes with no delay time from Jefferson & Flower to Vermont & Expo (Table 2). This contradicts page 2-26 that states it would operate in mixed flow on Exposition Boulevard. 37

- It assumes full signal priority for buses in most intersections, despite bus headways less than two minutes apart in both directions. DEIS Table 2-6 (page 2-32) shows an average peak headway of just 1.6 minutes: 38

Expo BRT Line	Headways (minutes) Peak	Base	Vehicles/hour Peak	Base
BRT-1	5	10	12	6
BRT-2	10	0	6	
436	10	20	6	3
438	20	0	3	
439	30	60	2	1
342	30	60	2	1
340	10	30	6	2
Total	**1.6**	4.6	37	13

Such bus headways with signal preemption would severely block cross traffic. In reality, buses would inevitably be stopping at red lights – as the Wilshire Metro Rapid buses do now – resulting in slower speeds. These limitations are documented in the DEIS: 39

> For transportation model purposes, signal priority or preemption assumed in busway (Exposition ROW); partial signal preemption assumed at major intersections and full preemption assumed at minor intersections for on-street BRT on Venice and Sepulveda; partial signal priority in street running sections outside the busway (in Santa Monica and downtown Los Angeles). (Table 2-7, page 2-33) 40

> The proper placement of advance detection devices will avoid abrupt changes in a signal cycle, (e.g. the green phase not truncated prior to a minimum specified time). ... However, it may not be feasible in every instance to provide the same level of priority treatment for buses traveling in both directions, especially if bus headways become too short. 41

> The effects of preferential bus signal on cross traffic movement / existing traffic signal system have been considered. Priority treatment of buses at intersections holds the potential to reduce a significant source of delay in bus operations. ... However, such an operational mechanism may adversely affect cross traffic movement. Also, today's traffic signal control systems are tightly inter-connected in order to provide progression of general traffic through the urban grid system. Thus, bus signal priority treatments would have to be constrained to achieve modest variations within the context of maintaining a viable synchronization program. 42

> For the alternatives that include an Exposition BRT, the BRT proposal calls for signal priority for the busway (Exposition ROW) and signal priority - but no preemption - in the street running section outside the busway (in Santa Monica and downtown Los Angeles). The partial signal prioritization that is proposed for the transit corridor may possibly increase delay for motorists crossing the corridor on the cross streets. (pages 3.2-66 – 67) 43

> Another factor that must be addressed with the use of gates at grade crossings is the frequency at which the bus arrives at the crossing. It can take from 40-60 seconds for a bus to clear a grade crossing, including the time required to call and lower the gates, pass through the crossing, and raise the gates after the bus has passed. As such, if the headway for the BRT is too small, the cross street traffic could be adversely affected, resulting in potentially significant impacts. A possible solution for this is to platoon the buses through the grade crossings that are gate controlled, so that the total delay for the cross street is minimized. (page 3.14-9) 44

But bus platoons are not possible because the stations are only one bus long. And multiple buses arriving at the same time create delays from too many people attempting to board the lead bus. 45

- It assumes skip-stop buses can pass other buses without provision for any passing lanes. Imagine buses traveling less than two minutes apart in both directions attempting to pass each other on a narrow two-lane road while negotiating intersections and bus stops. Can the MTA accept the danger of head-on collisions on the busway? 46

A more realistic BRT travel time model is:

Expo BRT	Miles	Max MPH	Stops	Avg. MPH	Minutes
Flower/Figueroa & 7th			1		
Flower/Figueroa & Expo	2.5	35	4	13	11.6
Expo & Vermont	0.6	35	1	15	2.5
Expo & Arlington	1.5	35	1	18	5.0
Expo & Crenshaw	1.0	35	1	21	2.9
Expo & La Brea	1.2	35	1	21	3.4
Expo & La Cienega	1.0	35	1	21	2.8
Expo & Venice	1.0	35	1	21	3.0
Venice & Sepulveda	1.9	35	3	18	6.3
Expo & Sepulveda	1.9	35	1	18	6.4
Olympic & Cloverfield	2.2	35	3	21	6.4
Colorado & 17th	0.5	35	0	15	2.1
Ocean & Broadway	1.5	35	2	13	6.8
Total to 7th Street	**16.9**		**20**	17.1	**59.2**
BRT Miles	12.3				

46

In fact, the LRT MOS (3A) with connecting Rapid bus service would be competitive in time with the busway. For the same capital cost it would provide the same travel time, superior service, and begin the light rail investment needed for the Westside.

Expo LRT + Rapid Bus	Miles	Max MPH	Stops	Avg. MPH	Minutes
Flower & 7th			1		
Flower & Washington	1.4	35	2	17	4.9
Flower & Expo	1.5	35	1	22	4.2
Expo & Arlington	2.2	35	2	22	5.9
Expo & Crenshaw	1.0	55	1	30	2.0
Expo & La Brea	1.2	55	1	30	2.4
Expo & La Cienega	1.0	55	1	30	2.0
Expo & Venice	1.0	55	1	30	2.1
(average transfer)					3.0
Venice & Sepulveda	1.9	35	2	15	7.6
Olympic & Sepulveda	2.2	35	2	18	7.4
Olympic & Cloverfield	2.2	35	2	18	7.3
Olympic & 14th	0.7	35	1	18	2.4
Ocean	1.5	35	1	13	6.9
Total to 7th Street	**17.9**		18	18.4	**58.1**

47

Ridership

Projected ridership of 29,000 was based on a travel-time model that assumed 47 minute and 39 minute travel times. The actual average travel time is 30% slower, which would result in ridership probably closer to 20,000. This will also significantly reduce New Transit Riders. The MTA should re-model ridership with an accurate travel time. To base a mode decision for BRT on such flawed data would be a grievous lapse of the environmental review process and the public trust.

48

Capital Cost

Capital cost per mile is $24.4 million per mile ($300 million / 12.3 miles, before adding the cost of buses). This is over half the $41.4 million per mile for Exposition LRT, and much greater than the $10-20 million per mile range often stated by BRT proponents. 49

The Expo BRT capital cost gives a seat-for-seat credit – 49 single-articulated buses offset by a reduction of 73 standard buses (net for Expo BRT – Tables 5-1D and 5-1E, page 5-4) – that new articulated buses would displace an equal number of seats of existing buses, which would be diverted to other service. 50

But this credit implies no additional bus capacity in this corridor. By contrast, Expo LRT only gave a net credit for 48 standard buses. An accurate BRT capital cost would be higher by some $25 million (73 standard buses at 3 per $1 million). In addition, because running time was understated by 30% (above), required equipment will increase 30% to around $32 million. 51

Operating Cost and Cost per New Transit Rider

Projected operating cost and cost per new Expo BRT rider is understated for four reasons:

- Running time was understated by 30% (above); therefore it will take 30% additional equipment to operate the same headways and passenger capacity. 52
- Ridership was overstated (above); therefore operating and capital cost per passenger mile will increase. 53
- No capital cost for buses was included (see above), understating total capital cost by 10% (not to mention future bus replacement cost). 54
- The MTA's current LRT operating costs include a large security cost – averaging $0.07 per passenger mile. MTA's current bus costs have a much lower security cost – averaging $0.01 per passenger mile. For an accurate comparison, this difference must be added into BRT operating costs. 55

Annualized cost per new daily transit trip for Option 2 BRT is given as $12.40. Corrected for the additional $32 million in bus costs, greater operating cost per passenger mile, and lower ridership, annualized cost per new daily transit trip for Option 2 Expo BRT would be significantly more than for Option 3 LRT. 56

A major shortcoming in the Draft EIS/EIR is the lack of supporting documentation to allow a reader to validate the operating cost and cost per new daily transit trip (incremental passenger) results. Neither the document nor Technical Appendix provides the necessary cost detail breakdown. 57

Noise

The DEIS documents well the greater noise of buses over light rail, and the exhaust-pipe noise source at the top of the buses which requires 12-foot sound walls. 58

> Comparing the projections for the LRT alternative with the projections for the BRT under similar conditions, it is clear that greater noise exposure is projected for the BRT alternative than for the LRT alternative. This occurs because (1) the buses are noisier than trains on an individual basis, particularly at lower speeds, and (2) more buses than trains are required for comparable passenger capacity. (page 3.0-10) 59

> The results in Table 3.9-6 indicate that without mitigation, 681 residential noise impacts are anticipated for the Exposition BRT, including 597 with moderate impact and 84 with severe impact. (page 3.9-12) 60

> As shown in [Table 3.9-8], a total of 21,750 lineal feet (4.1 miles) of 12-ft high sound wall would be required. (page 3.9-16) 61

Quieter LRT would impact many fewer homes than BRT, and can be mitigated with fewer and shorter sound walls. 62

> The results in Table 3.9-9 indicate that without mitigation, 135 residential noise impacts are anticipated for the Exposition LRT, including 108 with moderate impact and 27 with severe impact. (page 3.9-17) 63

> As shown in [Table 3.9-11], a total of 12,750 feet (2.4 miles) of 4-ft to 8-ft high sound wall would be required.... (page 3.9-20) 64

Safety

Serious BRT safety issues are unanswered. Gated grade crossings are problematic for BRT, unlike LRT:

> Also, in order to detect the bus to allow for full preemption of the traffic signal and to lower the automatic gates, BRT detection must be used. Trains have this detection feature built into the tracks, but buses do not have that option. Inductive loops may be the favorable solution, but they must have a built in redundant system to provide a fail-safe grade crossing. As such, if the loops malfunction, the gates lower, not allowing motorist or pedestrians to enter the crossing. A fail-safe design is necessary with using the gates, because the BRT operator is not expecting to stop at the crossing. (page 3.14-9) 65

Other serious safety issues for BRT are not considered in the Draft EIS/EIR:

- Buses lack the safety of the audible warning devices (horns) that are required of trains at grade crossings. 66
- Skip-stop bus service is proposed, that some buses would not stop at some stations. Such service would require skip-stop buses to pass other buses that have stopped at stations. But no passing lanes are provided. 67

  The result could be calamitous. A skip-stop bus approaching a stopped bus must veer in the other lane to pass – at 55 mph, at times while crossing an intersection, and with visibility of oncoming buses blocked by the stopped bus. 68 In addition, there's the risk of pedestrians on the busway at the station. High speeds on two-lane roads – especially with passing – are rightly considered very dangerous. Given this danger, how can this be considered for a busway? 69
- Stations on bridges propose that the bus lanes would cross over to the left side in order for right-side bus doors to line up with a center platform. But unlike the Harbor Transitway Green Line station were buses run on 15-minute headways, these buses would be less than 2 minutes apart. And visibility of on-coming buses would be blocked by being at the top of a hill. The effect of this would be delays and possibly even head-on collisions. 70

- Although the proposed lane widths match recommended FTA standards, the busway design lacks a safety median between directions. The National Urban Transit Institute ("At-Grade Busway Planning Guide, December 1998) recommends a three foot median. 71

Surprisingly, the San Fernando Valley East-West Transit Corridor DEIS/EIR proposed an entirely different – but no more reassuring – control for BRT grade crossings:

> Before reaching the intersection, drivers would be warned by "pre-signals" that they are approaching an intersection that crosses the corridor. 72
>
> The intersections will operate as an at-grade street crossing, and will not require the installation of gates, bells or whistles associated with rail crossings. Busway drivers will have direct control over their vehicles and will be able to brake quickly or move out of the way to avoid incidents. (SFV page 4-266)

This is frightening. No gates, just warning "pre-signals" for 55-mph grade crossings. And the buses are expected to swerve out of the way of danger within a 13-foot wide lane? 73

As documented in these reports, there is no safe way for BRT grade crossings to exceed 35 mph. 74

CIVIS Bus ≠ LRT Capacity or Speed

The DEIS/EIR shows illustrations of the new CIVIS bus on a potential busway in Eugene, Oregon (Executive Summary page 13). Some BRT proponents claim these new buses are comparable to light rail at lower cost. This is wrong for the following reasons: 75

- Lengths are 12, 18, or 24 meters (40, 60, or 80 feet). A 60-foot CIVIS bus has the same capacity limitations as a conventional articulated bus. With part of Exposition BRT on city streets, 80-foot buses would not be possible (illegal under California Motor Vehicle Code, not to mention unsafe in traffic). Claimed capacity of 150 passengers per 80-foot vehicle includes many more standees than MTA standards allow for regular buses. Reasonable capacity would be perhaps 75 with standees on a 60-foot articulated bus. Delay would still come from stopping at intersections due to close headways. 76

- CIVIS power is by overhead wires (as an electric trolley bus) or on-board engine-generator. As trolley wires are not being considered, the noise, vibration, and exhaust of an on-board engine remains a shortcoming of the CIVIS bus. 77

- Maximum CIVIS bus speed is advertised as 70 km/hr – about 43 mph. Average speed is stated as 22 km/hr – 14 mph. These are far short of Exposition LRT's 55 mph maximum, 24 mph average. (Press release, May 2001) 78

Some BRT advocates have argued that an initial BRT line would demonstrate whether there is sufficient ridership for later LRT. Quite the contrary. To spend $300 million on a busway that is too slow to attract much ridership would waste this unique Westside right-of-way and $300 million on a neighborhood-impacting, unpopular failure – not unlike the Harbor Freeway Transitway – which would only appear to show Westside people won't ride transit. This would be a tragic waste of money and opportunity. 79

All Alternatives – Wilshire BRT

Operating Cost

Table 5-9 (page 5-14) indicates Annual O & M Cost for Alternative 1 (Wilshire BRT) as $6.89 million. For Alternative 2 (Wilshire + Exposition BRT) Annual O & M Cost is $19.42 million. Thus Expo BRT alone is the difference, $12.53 million. Why would Wilshire BRT Annual O & M Cost be half that of Expo BRT? 80

Unacceptable Effects of Removing Traffic Lanes

The DEIS documents in general the effects of diverting the traffic of one Wilshire Boulevard lane in each direction onto surrounding streets: 81

> The corridor analyses indicates that the loss of one lane in each direction on Wilshire Boulevard, as a result of the proposed Wilshire BRT (Alternatives 1, 1A and 1B), is expected to have a significant effect on diverting traffic from Wilshire Boulevard to the broader east-west corridor area. (page 3.2-45) 82
>
> The diversion of traffic is spread out over a large area because many east-west streets north of Washington Boulevard are at capacity before the lane on Wilshire Boulevard is dropped. (page 3.2-46) 83

It misses some specific points, however:

- There are only a limited number of passages under the San Diego Freeway (405) in West Los Angeles – Sunset, Wilshire, Ohio Avenue, Santa Monica, Olympic, and Pico Boulevards (Screenline 4N, page 3.2-29). Especially during afternoon rush hour, they are all backed up for blocks. Even two-lane Ohio Avenue has long lines of cars seeking to avoid Wilshire and Santa Monica. Sunset backs up from the west past Bundy. Wilshire backs up to Federal on the west and close to Beverly Glen on the east. 84

  All of these alternates are already projected to be at LOS E or F (Figure 3.2-12, page 3.2-48). 85
- How would curb lane BRT lanes pass the Wilshire interchange with the 405 freeway? 86 Weaving of traffic onto and off of these ramps is already very difficult; which lanes would be taken for BRT, and how would freeway traffic cross them? 87
- In Beverly Hills, eastbound Wilshire backs up from Santa Monica Boulevard to the west side of the Los Angeles Country Club and westbound much of the way across Beverly Hills. 88
- Conversely, from Highland Avenue to Wilton Place – past Hancock Park – traffic is generally free-flowing all day and dedicated bus lanes would provide little or no benefit. 89
- Issues of removing the landscaped medians in the Miracle Mile are well known. A rush-hour-only curb bus lane has been proposed as an alternative for this section. 90
- The City of Santa Monica is on record opposing the irreplaceable loss of on-street parking for businesses along Wilshire Boulevard in Santa Monica. Santa Monica has a chronic parking shortage already, and there is no land available to develop replacement parking. (City Council resolution, June 12, 2001) 91

- The bi-articulated buses proposed for Wilshire appear to be illegal under the California Vehicle Code. In addition, Wilshire BRT buses would operate in mixed-flow traffic both east of Western Avenue and within the City of Santa Monica, and the length of the line if the bus lanes are peak-hour only. Can such 80-foot buses safely mix with traffic? 92

The DEIS/EIR, although giving traffic volume increases, stops short of stating how much slower automobile travel would become after removing 1/3 of the lanes on Wilshire in each direction (1/4 in Westwood Village). One need only recall what happened in the 1970s when the Santa Monica Freeway converted one lane to HOV-3, to anticipate drivers' reaction to construction and removal of traffic lanes on Wilshire. 93

Minimal Benefit at Great Cost

The Metro Rapid bus line 720 already carries 28,200 passengers per day on Wilshire and Whittier Boulevards (April 2001). It's not stated how many trips begin and end on the Eastside, but a large majority must involve the Westside. 94

Projected Wilshire BRT ridership is 39,600 – and only 32,500 combined with Exposition light rail. If 20,000 Metro Rapid trips include the Westside, that's only 12,500 additional boardings for Wilshire BRT at the cost of $363 million. The DEIS/EIR's figure of 11,100 Incremental Linked Trips is out-of-date and should be updated. (Table 5-5, page 5-11) 95

Upgrade of the existing Wilshire Metro Rapid service with larger buses, prepaid fares, and queue-jumper lanes where feasible would provide most of BRT benefits at much less cost and without major traffic disruption. 96

THE GRAND Olympic AUDITORIUM

April 19, 2001

MTA
David Mieger, Project Manager
99 – 22 - 5
1 Gateway Plaza
Los Angeles, CA 90012 - 2952

Dear Mr. Mieger:

I have carefully reviewed all the correspondence regarding the proposed Light Rail Project and I am in full support. However, I would like to address certain points of concern. The first being the potential disruption of traffic on Washington Blvd. and the closing of Grand Ave. during our events which would greatly affect our business. I am concerned that traffic on Washington Blvd. will be diverted north of Washington causing disruption to our events and business. I would also like to address the statement in which you mention that there presently were not any special property taxes associated with the MTA rail projects except at the Red Line Station in Downtown Los Angeles . I would like to know for certain that our property taxes will not be affected by this as we were previously charged for other mass transit systems in the Downtown Los Angeles area that our company certainly did not benefit from.

If you have any questions regarding this letter please do not hesitate to call me.

Sincerely,

Steve Needleman, President
Grand Olympic Auditorium

SN/gd

cc: Daniel Walker

1801 South Grand Ave. • Los Angeles, CA 90015 • Fax: (213) 622-1939 • Tel: (213) RI 9 - 5171
Mailing Address: P.O. Box 55047 • Los Angeles, California 90055

June 15, 2001

Mr. David Mieger
Transportation Planning Manager $
Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, Ca., 90012

Via Fax: 213-922-3060

Dear Mr. Mieger:

I am resubmitting this letter faxed to you earlier today to correct type errors and qualify some meaning. 1

I am unable to access the computer in my Westwood office, which contains the written response we intended to forward today regarding the draft environmental document concerning proposed public transit options for Wilshire and various route and mode options for the Exposition Blvd. corridor. I do not have the correct title of the draft document out for public comment because the document is also in my Westwood office. This letter therefore should not be considered defective for failure to correctly identify the title of the environmental draft document. My comments are made as if I had properly identified the title of the draft document. 2

The geographical area served by the Holmby-Westwood Property Owners Association is impacted by the Wilshire Blvd. busway proposal since Wilshire Blvd defines the southern boundary of the association service area. 3

Holmby-Westwood Property Owners Association is not identified as a participant in the draft preparation process, in spite of the fact we did participate. Perhaps there is confusion with the name of Westwood Homeowners Association, which also participated in the scoping process, but serves the community south of Wilshire Blvd. 4

The association represents the 1100 home single family community, in particular in land use, traffic and transportation matters. The boundaries as shown in Exhibit 1 are Hilgard on the west, adjacent to the UCLA campus, the Los Angeles Country Club on the east, Wilshire Blvd. on the south and Sunset Blvd. on the north. Exhibit 1 identifies the Holmby-Westwood community in relation to UCLA, Westwood Village and the LA Country Club to give geographical perspective to our service area 5

The community has poor access to the current Wilshire busway system unless within walking distance to Wilshire. There is no MTA public auto parking adjacent the Wilshire bus route at major commercial hubs of Westwood Village on the west, and the Santa Monica Blvd. Beverly Hills and Century City commercial hubs immediately to the east. The lack of MTA public parking at these commercial hubs discourages diversion from auto to public transit by residents of community's north and south of Wilshire, adjacent and between these east west hubs for greater length trips east and west of those hubs. An increased reduction of daily auto trips along the Wilshire corridor is the best environmental benefit from an improved busway system along Wilshire. 6

The draft fails to develop workable MTA public parking options for these residents that will divert them from autos to public transit. The lack of MTA public parking for the project exists for most adjacent communities for most of the length of the project. Auto access to street parking on streets adjacent to Wilshire is generally time restricted because of the already existing impacts from intense development 7

The draft document was reviewed and discussed at the May 8, 2001 meeting of the Board of the association. The Board with one abstention, voted to oppose the 3 Wilshire Blvd. busway options discussed in the draft, and to take no position on the route and mode options of the Exposition Blvd. transit proposals discussed in the draft document. On instruction from the Board, I testified against the 3 BRT options at the West Los Angeles public hearing on May 15, 2001 and those comments are part of the public record. 8

The association objects to the Wilshire BRT busway alternatives because they do not improve, either access to the existing Wilshire Blvd. Red bus transportation, or improve access to other existing Wilshire bus routes and generates major traffic flow problems. 9

A major failure of the draft document was to first acknowledge, then fail to discuss, workable mitigation to major traffic impact problems including, but not limited to left turn problems, loss of street parking, and loss of auto traffic lanes along one of the busiest, if not the busiest auto transportation corridors in the City of Los Angeles. 10

To suggest such impacts maybe mitigated by later engineering study fails the most important burden of proof requirement for this project, and that is, that those undefined engineering work options must mitigate to a level of environmental insignificance, the impacts you have identified as significant. Until you can make such a showing, you have not demonstrated the project will not impact access to the heavily developed high rise Wilshsire Blvd. condo community and transfer substantial auto impact traffic onto adjacent residential streets. This failure to disclose and discuss mitigation solutions is the death sentence for this project as proposed. 11

The association urges you abandon these BRT options and rely on a citizen participation program, involving the stakeholders along the Wilshire corridor. The citizen participants should be charged with the responsibility to develop a workable TSM (Transportation System Management) alternative that will deliver improved public transit along this corridor, improve access for westside auto dependent residents to the transit corridor, and avoid the additional delays to improved westside public transportation by avoiding litigation of over the project as proposed. 12

The value of the impacted communities stakeholder participation to develop the appropriate project has been demonstrated by the fact such process delivered a superior and successful subway system between downtown LA and North Hollywood. It's time to start thinking beyond the MTA box, by opening the box to participation in the planning of public transportation, by the people whom use public transit, want to use public transit and are impacted by public transit. Stakeholders, by consensus planning, will deliver superior public transportation by creating the solution to better public transit, rather than being left to just pick over the flaws and failures of an exclusionary planning process. 13

Since the record will be filled with detail from other commentaries, I will mention by reference rather than discussion, some major concerns to the findings of the draft. 14

> The draft fails to develop a plan for auto drivers to access the corridor. The minimal incremental ridership increase of the 3 RT proposals is the consequence of the inability of the busway to accommodate potential users who need to park someplace adjacent to Wilshire to access the busway. 15

> We urge you consider joint venture parking development, such as joint development of UCLA lot 32 at Veteran and Wilshire, to both encourage and accommodate people who can only access Wilshire buses by auto. 16

Federal and state funds are to be used to develop this project. These funds cannot be used in a discriminatory manner or to promote discriminatory results. The draft Wilshire busway options discriminate against a vast westside population of potential transit users and only will deliver a system of transit that already exists, serviced by existing feeder north-south bus routes, and used almost exclusively by a low income transit dependent population. 17

As a senior low income, transit dependent transit user, I am familiar with the makeup of the current bus rider population since I occasionally use Wilshire buses to access my office via the Red line from my Valley Village residence in the San Fernando Valley. Since federal and state funding is required, the service must not only be available, but also accessible to the largest population demographic of the westside, the auto driver, not just low income transit dependent. 18

The draft fails its burden of proof to support the Wilshire BTR options by failing to meet what should be its most primary objective, the reduction of daily westside auto trips and traffic by diversion of auto riders to improved and accessible public transit along the Wilshire corridor 19

Abandon this Wilshire corridor BRT folly and turn the opportunity to develop a better alternative for improving Wilshire corridor public transit to the Wilshire corridor stakeholders under the TSM process. 20

Yours truly

Tom Paterson

Tom Paterson
Office Manager
Holmby-Westwood Property Owners kAssociation
1081 Westwood Blvd. Suite 225
Los Angeles, Ca., 90024
310-824-0101

CC: Board
Sandy Brown, President
Members MTA Board
Area Community Associations
Mayor James Hahn

EXHIBIT 1

LEGEND

- Signal
- Signal w/ left-turn phase
- Stop sign
- Turn restriction

Figure I–7
EXISTING TRAFFIC CONTROLS

JUN 18 2001

SCANNED IN RMC

JA 1

Jack Allen

Attorney at Law

15015 Bestor Boulevard,
Pacific Palisades, California 90272

(310) 454-2062
Fax (310) 454-8037

June 13, 2001

David Mieger,
Project Manager,
Los Angeles County MTA,
One Gateway Plaza Mail Stop 99-22-5,
Los Angeles, CA 90012

Re: MID-CITY/WESTSIDE TRANSIT CORRIDOR DRAFT EIS/EIR

Dear Mr. Mieger:

On behalf of Palisades Preservation Association (PPA), the following comments are submitted concerning the subject EIS/EIR.[1] First, our Association has long been an advocate of a mass transit system connecting the Westside to downtown Los Angeles and to Hollywood to serve the needs of both the Westside, Hollywood, and downtown Los Angeles. We have always wanted such a system to serve the Wilshire Corridor where many of our residents work. 1

In general PPA opposes all alternatives presented in the EIS/EIR, either the Wilshire BRT or the Exposition LRT. Both will cause more problems than they solve, primarily because both are at-grade projects, and both will seriously interfere with other vehicular traffic. As a result either will create more traffic congestion and seriously clog surface traffic that intersects with the routes. The Wilshire BRT, by taking out of use traffic lanes on Wilshire further cause congestion in the Wilshire Corridor. Moreover, either will result in an increase in accidents on their routes. 2 3 4

The proposed alternatives also will be ineffective solutions because neither really addresses the basic problems plaguing the Westside relating to transportation. The Westside has two problems. The first is serving the Wilshire Corridor including Century City. The second is providing a rapid mode of transportation between downtown Los Angeles and Santa 5

---

[1] The author is very familiar with the transportation demands between downtown Los Angeles and the Westside. As City Attorney and as Senior Assistant City Attorney of Beverly Hills between 1973 and 1987, the author was heavily involved in land use and transportation issues in the Wilshire Corridor and involving Century City, as well as a commuter. After 1987, the author commuted between his office in downtown Los Angeles and his home in the Pacific Palisades. The author was responsible for raising many of the issues concerning transportation in the General Plan Framework for the City of Los Angeles that resulted in an appellate court overturning the General Plan Framework in 2000. 6

Monica. None of the alternatives solves both problems, or either of the problems.

The Wilshire BRT is a Washout and No Alternative is Preferable. 7

In our opinion, the Wilshire BRT will still be too slow for most commuters and it is impractical. To be effective, busses must make frequent stops in order to first, pick up riders at points that are convenient for them to walk to; and second, to drop off commuters reasonably close to their destinations. Otherwise, commuters will not abandon their cars. Where a BRT might work in Brazil or other cities in the world, Los Angeles is not really conducive to BRT operations because of length of the Wilshire Corridor and the nature of the communities it serves. The projected 14 stops is far too few to be effective because too many commuters will either have to exit or enter at points too remote from their homes or offices or destinations for it to be convenient to use BRT. 8

For example, having bus stops only at La Cienega, Robertson, Beverly, and Santa Monica Blvds. in Beverly Hills will not serve riders in Beverly Hills. There should be additional stops at Doheny, Rexford, and Bedford. It also makes far too few stops in Santa Monica to be convenient for users. If there are not stops at Centinela, Yale, 26th Street (major north-south arterial), 20th Street, Lincoln Blvd. (another major north-south arterial), it will fail to serve Santa Monica. Yet that points up a major problem. Without adequate stops, the rider base is decreased significantly. On the other hand, adding stops means longer trips, which will also reduce ridership. In the end, the Wilshire BRT washes out so that a "No Alternative" is the preferable Alternative. 9

Exposition Blvd. LRT, the USC Trolley.

The real beneficiary of the Exposition Blvd. BRT or LRT is USC. It does not serve any major commercial, residential, or manufacturing center between Santa Monica and USC. For that reason, it will be referred to further herein as the "USC Trolley." 10

The problem with the USC Trolley is that there are two alternatives, the Full Length and the short length or MOS (Alternative 3A). If the Trolley is not full length, it will not serve the Westside at all. Yet because of financial considerations, many feel that only the Shortline Trolley will be built. It would be better not to waste money to build a short line. 11 12

Table 2-8 states that the running time will be 42 minutes between Santa Monica and 7th and Flower Streets in downtown Los Angeles for both the USC Trolley and the Wilshire BRT.[2] The EIS/EIR does not state how the running times were calculated so that it is not possible to determine from the materials provided whether or not this is a fictional figure. 13

---

[2] Copying any information from the Acrobat Reader was impossible, even when it was imported into Acrobat 5.0. The information became gibberish when copied into either a WordPerfect or Word document even though the Document Security for the Acrobat version was set to allow copying. Thus if a reader wanted to copy out one set of data and put it on a page with other data for the purpose of comparison, it could not be done. Nor could a reader print out the pages to compare two charts unless the printer supports Postscript. 14

Some are mislead by this figure. They use the 42 minute figure in comparison with the drive time on the Santa Monica Freeway at present or in the future. Presently, a person can drive from Pacific Palisades to the Civic Center during peak hours between 45 to 55 minutes. While there are projections that this will get worse, there are proposals to increase surface street capacity which will reduce travel times so the travel times will not increase significantly. For a commuter from the Pacific Palisades, it would take approximately 15 to 25 minutes to get to a parking area. Then the commuter would have to wait up to five minutes to catch a bus or train. After leaving the bus or train, the commuter would have from five to twenty minutes to get to his or her destination. That amounts to between 62 minutes and 87 minutes, not much an incentive to ride a bus or train. 15

That is true to a great extent for other commuters who must drive to a parking area, catch a bus or train, and then travel to their destination after they debark from the bus or train. Unless a commuter lives within a five minute walking distance of the bus or train stop and within five minute walking distance from the bus or train stop and the commuter's destination, there is little incentive for commuters to abandon their cars. 16

Traffic Conflicts.

One of the biggest concerns that many have with surface transit is the conflicts with other traffic. It will be significant if grade crossings are not elevated. The author rode the old Red Lines in the 1940's and in 1950 and his father in law was a motorman on the Red Lines. By 1949 no one was riding the Red Lines. The author often was the only person in the car and his father in law said he made many empty trips. After World War II everyone used motor vehicles. With far more vehicles on the streets, the conflicts between rail transit and motor vehicles became much more frequent, especially at grade crossings. It was a combination of accidents at grade crossings and low ridership on the rail lines that doomed rail transit in Los Angeles, not the tire and bus companies as is often suggested. 17

The alternatives reintroduces the same problems. The Blue Line has proven that surface rail is an invitation to accidents. Surface trains create such delays that both drivers and pedestrian will seek to make dangerous crossings. It is human nature and it is unavoidable. 18

Therefore, unless above grade crossings are provided for both the Wilshire BRT and the USC Trolley (particularly for the Trolley), accidents will be common, interfering with the operations of the busses and trains. One accident is one accident too many.

But a more serious problem will result and that is severe interference with rush hour traffic which must cross either Wilshire or Exposition Blvd. Table 2-8 states that there will be a 2.5 minute combined time frequency during peak hours. That means that every two and a half minutes, a train will cross an intersection on Exposition Boulevard. That means that for each signal and gates to fall and then rise again and for the signal to recycle will take two minutes leaving only 30 seconds for traffic to cross the intersection. Many of the intersections that the busses and trains will cross are already in an F condition during peak hours. The delays caused by the busses and trains will only exacerbate the congestion. The EIS/EIR 19

minimizes the impacts that this will have and it is inaccurate for the EIS/EIR to minimize the impact that such congestion will have on adjacent neighborhoods as drivers seek alternate routes to avoid the worse intersections such as La Cienega, Pico, etc. 20

While it is suggested in Alternative 3 that some grade crossings be converted to overhead crossings as an alternative, it is imperative that all grade crossings be overhead. 21

We object to the use of the Underground Subway from USC to Flower Street. Experience has shown that subways are extraordinarily expensive. We suggest that overhead transit be used instead. It is proposed to be used in the downtown area of Santa Monica and there is no reason it cannot be used from USC to Flower Street. 22

Failure to Discuss Better Alternatives.

The preferable alternative would to avoid both Wilshire Blvd. and Exposition. The use of overhead monorail would have been preferable to any subway or surface rail, with the exception of the Green Line. Overhead rail on the Santa Monica Boulevard starting at Lincoln Blvd. in Santa Monica to Sepulveda Blvd., then north to Wilshire, east to Westwood Blvd., south to Santa Monica Blvd., east to 3rd Street in Beverly Hills, east on 3rd Street to San Vicente Blvd., then south to 6th Street and down 6th street to downtown LA would be preferable. The overhead should continue from the intersection of Santa Monica Blvd. and 6th Street up Santa Monica Blvd. until it connects with the Red Line in Hollywood. 23

Then there would be a transit system that really serves the Westside. Our concern is that the proposed Mid-City/Wilshire Corridor will not only fail to solve the problems of this area, but use up funds that could be used to build an effective transit corridor as well as any incentive to develop a viable transit system. 24

Sincerely yours,

JACK ALLEN

JACLA(S)

SCANNED
IN RMC

JACL

WEST LOS ANGELES
AUXILIARY

April 26, 2001

David Mieger, Project Manager
Los Angeles County MTA, One Gateway Plaza
Mail Stop 99-22-5, Los Angeles, CA 90012

In re: Draft EIS/R-- MID-CITY/WESTSIDE TRANSIT CORRIDOR

Dear Mr. Mieger:

On behalf of the West Los Angeles Japanese American Citizens League Auxiliary, I reviewed the Executive Summary for the subject project as it pertains to Alternative 3 - Wilshire BRT and Exposition LRT, since this is the Alternative which we have consistently voiced our concerns over and opposed. 1

The concerns and opposition are listed below as they appeared on the report:

Pg. 14: "Elevated grade separations would be constructed at La Cienega/Jefferson, Pico/Sawtelle and Bundy" (emphasis added), due to high traffic volumes on these cross streets." 2

It is assumed that this/these elevated grade separations will also include Pico/ Barrington, which is between Sawtelle and Bundy Avenues and has just as much traffic.

Pg. 15: "Alternatives Considered" - Illustrations show that a support bar and overhead wires will be required to provide power to the trains on this Light Rail System. 3

This will add to the clutter and sight obstruction on all streets involved, which is exactly what was being combatted by the Utilities Undergrounding Districts.

Pg. 24: Issue 9: Equity of At-grade Alignment. Comment is made that concerns have been raised in "South Los Angeles, Baldwin Hills and East Culver City Neighborhoods...regarding the potentital proximity effects of bus or light rail operations at-grade in residential areas." 4

Similar concerns have been expressed from the very inception of these plans from West Los Angeles residents but are not mentioned.

Pg 24: Issue 10: Pedestrian and Vehicular Safety: "At vehicular intersections, crossing gates would be utilized where trnasit speeds are greater than 35 mph. Such gates may not be possible in certain areas due to noise or traffic concerns, and in such cases, transit speeds would be slowed to less than 35 mph."

If the Elevated Grade Separations are not provided, slowing of the trains at heavy traffic intersections will result in even more traffic congestion and tieups. Pico Boulevard has been designated as a Pedestrian-Oriented area and this plan would conflict with that designation. 5

Pg. 39: Land Use/Neighborhoods - Accessibility and Community Cohesion: "Increased access to existing activity centers. Increased transit service on Wilshire Blvd or along the Exposition ROW, Venice or Sepulveda would not affect physical connections between neighborhoods."

The confluence of these transit routes in addition to the 405 Freeway on/off ramps will destroy any 'neighborhood', as well as the Day Labor Site recently established in this location. 6

Pg. 45: Visual Quality - Privacy: "At Pico/Sawtelle and Bundy where the route would be located on aerial structures, bus riders would have access to views into residences or the yards of residences at those locations. Similarly, LRT patrons waiting at these elevated stations could have views that result in loss of privacy for residential uses located near stations."

The Mitigation simply says to "provide landscaping or other screening structures to obstruct views into private residences...." People who are familar with elevated train routes know that such screening does not endure and is not maintained, leaving the residents to fend for themselves in maintaining their privacy. 7

Pg. 46: Noise and Vibration - Noise: "Exposition LRT would result in 135 residential noise impacts.... 108 residences would exceed FTA moderate impact criteria and 27 would exceed FTA severe impact criteria." Conclusion: "For the Expo LRT Alternative, residual impacts remain at 15 residences following the consturction of soundwalls." 8

Pg. 47: Noise and Vibration - Vibration: "Impacts at 138 residences, 22 multi-family bldgs, 1 hospital and 1 school." "Significant. Impact (after Mitigation) would remain at 31 single-family residences and 3 multi-family bldgs." 9

Geology/Soils/Seismicity: "Exposition route would construct elevated structures in faul zones and in liquefaction areas." "Significant on Exposition route." 10

Pg. 50: Safety: "Exposition LRT route passes adjacent to schools and parks where pedestrian activity is high. Pedestrians will be required to cross LRT lanes only at signalized intersections." Mitigation: "Fencing shall be installed in all segments with LRT speeds greater than 35 mph; school and community safety education/information programs shall be implemented." 11

Any LRT route near schools should be fenced for the entire area, not just where speeds are greater than 35 mph. Children are notoriously attracted to trains and accidents will occur.

Pg. 53: Hazards: "Prior environmental studies reveal that there are areas of contamination along the Exposition Route including both sites and buildings." Degree: "Significant for contaminated replacement parking sites and for Exposition ROW areas." 12

These comments are based only on the Executive Summary. Prior comments have stressed the opposition to Light Rail along the route specified. Why should this area be the only one subject to rail transit instead of BRT? 13

Other questions might be: Why are there two massive rapid transit route needed and planned to go to downtown Santa Monica? With all the construction and 'in-building' in the Marina Del Rey area, with Playa Vista rapidly approaching, why doesn't one of the lines go toward that area in anticipation of the need? Is this plan going to interface with feeder routes to the LAX Airport to cut down on the increased transportation and parking needs in the future? 14

I will be unable to represent our group at the public hearings scheduled in May. Please accept this written comment instead. 15

Sincerely,

WEST LA JAPANESE AMERICAN CITIZENS
LEAGUE AUXILIARY

BY: Jean Ushijima, Chair

3719 Butler Avenue
Los Angeles, CA 90066
(310)390-6914

cc: The Hon. Cindy Miscikowski, LA City Councilwoman
WLA JACL: Pres. Jean Shigematsu
Westside Residents Assn. (Pres. Sylvia Nickel; Board Members Tom Donovan, Al Casas)

MTA

From: Mid-City WestSide
Sent: Tuesday, June 19, 2001 10:26 AM
To: 'Juliamaher@aol.com'
Subject: RE: Expo LRT support letter

Ms. Maher:

Thank you for your comment on the Mid-City/Westside DEIS/EIR.

We have logged your comment into the record.

We are scheduled to go before the MTA Board on June 28, 2001. The DEIS and a summary of the comments received will be presented. At that time a locally preferred alternative will be selected.

Sincerely,

Mid-City/Westside Project Team

-----Original Message-----
From: Juliamaher@aol.com [mailto:Juliamaher@aol.com]
Sent: Thursday, June 14, 2001 3:28 PM
To: MidCityWestside@mta.net
Cc: Friends4Expo@aol.com
Subject: Expo LRT support letter

JUM(1)

David Mieger, Project Manager
MTA
One Gateway Plaza, Mail Stop 99-22-5
L.A. CA 90012

We, the board of directors of the Castle Heights Neighborhood Association, are writing to voice our support for a light rail line along the Exposition corridor from downtown Los Angeles to Santa Monica. Such a line would help relieve the ever-increasing traffic congestion on the Westside and would connect our community to the rest of Los Angeles' emerging rapid transit network. 1 2

Compared to buses, light rail has no exhaust, carries more passengers at a lower operating cost, and attracts higher ridership. 3

A great city deserves a great public transit system! 4

Sincerely yours,

Julia Maher
President

Los Angeles County Metropolitan Transportation Authority
Mid- City/Westside Transit Corridor
Draft Environmental Impact Statement/Report

U.S. Department of Transportation
Federal Transit Administration

KA(1)

COMMENTS

Please use this page to submit your comments about the Draft Environmental Impact Statement/Report (DEIS/EIR) on the Mid-City/Westside Transit Corridor. You may discuss any aspect of the project in which you are interested.

I am a resident of the West of Westwood HOA and I support Alt. 1. 1

Buses are more flexible. Rail is fixed. Buses can deviate from the line to avoid sensitive areas such as schools and homes rail cannot. 2

There is a proven ridership on Wilshire. The Wilshire Rapid Bus can not keep up with the demand. [redacted] 3

It travels through activity centers that service the people of Los Angeles and tourist. 4

Exposition Blvd. does not do that.

The Expo ROW goes through neighborhoods. The detour on Expo proved that going through Commercial Zones and **not neighborhoods** increases the ridership. 5

Until Expo ROW's detour travels through more commercial than residential areas it should not be developed. 6

The Wilshire Rapid Bus and Expo ROW parallel each other in Santa Monica. If you develop Expo ROW Santa Monica will have **two** rapid lines to it and Venice none. 7

Mitigating the negative impact Expo ROW will have on residential neighborhoods will be too costly. Money can better be used on Wilshire. 8

Develop the route that services more people. 9

(If necessary, please continue your comments on the reverse side of this paper.)

To receive information regarding the Mid-City/Westside Transit Corridor DEIS/EIR, please complete the information below.

Name KARIN CROPPER Phone/Fax 310-475-1548

Address 2936 MILITARY AV

City/State/Zip LOS ANGELES, CA 90064

Mail sheet by Friday, June 15, 2001 to:
MTA, ATTN. David Mieger, One Gateway Plaza, Mail Stop 99-22-5, Los Angeles, CA 90012
(310) 366-8443 Fax: (213) 922-3060 E-Mail: MidCityWestside@mta.net

KR(1)

SCANNED IN RMC

KILROY REALTY CORPORATION

213-922-3060 FAX

June 14, 2001

Mr. David Mieger
MTA
One Gateway Plaza
Mail Stop 99-22-5
Los Angeles CA 90012

Re: **Mid-City/Westside Transit Corridor Draft EIR/EIS**

Dear Mr. Mieger:

In connection with the Mid-City/Westside Transit Corridor Draft EIR/EIS, Kilroy Realty, a property owner and manager of several million square feet of office in the Los Angeles area, including office locations immediately adjacent to proposed project routes, stops and stations, supports Alternative 1 – Wilshire Bus Rapid Transit. 1

From a review of the Draft EIR/EIS documentation, and our representative's attendance in May 2001 of the public hearing held at the Veteran's Administration Hospital, we would like to provide the following comments and observations: 2

- Ridership of Alternative 1, Wilshire Bus Rapid Transit, will be greater than Alternatives 2 or 3. The Wilshire route traverses more intensely developed commercial corridors and employment centers. There is existing, proven demand along this route. Further, Alternative 1 is more feasible than Alternatives 2 or 3 from the standpoint of (1) engineering, (2) costs, and (3) timing/implementation. 3

- Alternatives 2 and 3, which we do not support, would provide environmental impacts that will be difficult if not impossible to mitigate to a less than significant level, including: 4
  - **Traffic impacts** - as area intersections along Alternatives 2 and 3 route will be further degraded to unacceptable levels of service; 5
  - **Noise impacts** - as area businesses and residents will be subjected to operational noise from the Exposition LRT/BRT 20 hours a day, 7 days a week, from 5:00 AM to 1:00 AM daily; and 6

Suite 501 • 501 Santa Monica Boulevard • Santa Monica • California • 90401 • Fax (310) 434-1583 • Tel. (310) 899-3200

- **Land use impacts** - from (1) the elimination of existing land uses and structures to accommodate new park-and-ride lots, and (2) the significant disruption of existing residential neighborhoods. 7

We urge the MTA to adopt Alternative 1 – Wilshire Bus Rapid Transit, as the Preferred Alternative. 8

Very truly yours,

Campbell Hugh Greenup
Executive Vice President

Justin Smart
Senior Vice President

c: Yvonne Burke, Los Angeles County Supervisor, 500 W. Temple, Room 866, L.A. CA 90012
Zev Yaroslavsky, Los Angeles County Supervisor, 500 W. Temple, Room 821, L.A. CA 90012
James Hahn, City of Los Angeles Mayor-Elect, 200 N. Main St., Ste. 800, L.A. CA 90012
West of Westwood HOA, POB 64496, L.A. CA 90064

Los Angeles County Bicycle Coalition
LACBC
Improving The Bicycling Environment & The Quality Of Life

634 S. Spring Street
Suite 820
Los Angeles, CA 90014
Tel 213.629.2142
Fax 213.629.2259
www.labikecoalition.org
rpm@labikecoalition.org

June 15, 2001

David Meiger
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
MS 99-22-5
Los Angeles, CA 90012
VIA FAX: 213-922-3060

Re: Comments on Westside Transit Corridor Draft EIS/EIR

Dear Mr. Meiger:

Thank you for this opportunity to comment on the Westside Transit Corridor Draft EIS/EIR. This voluminous document obviously represents a lot of work that was expended to cover the myriad aspects of the project. We wish to express our appreciation for the effort that went into it. 1

We have reviewed this document from the point of view of MTA customers who use cycling as transportation. Better integration of cyclists and bicycles into your design will enhance mobility and cost-effectiveness for all your customers on the Westside. We believe there is enormous potential for cycling to reduce traffic, enhance the environment and improve livability in the area. 2

Our comments will largely focus on the bicycle element of the Exposition transit corridor. We understand that specific details about the bikeway design are not included in the EIR/EIS but will be developed if and when the project receives approval. Nonetheless, there are a number of points we would like to make to assure that bikeway-related issues are thoroughly considered at the earliest appropriate design stages. 3

Creating a Model Corridor

The Exposition corridor presents a unique transportation opportunity for our region. It has one of the highest population densities, greatest volumes of travel and greatest demographic diversity of any MTA travel corridor. This makes it one of the biggest transportation/land use challenges facing the agency. And with this comes the opportunity to create solutions and innovations that can make it a model for your agency's approach to other corridors. 4

Fundamental to the success of any Exposition transit system will be its integration with the communities it serves and its potential customers. More than just the location of stations and the amount of parking provided, the project must address the diverse ways that the community will utilize the transit elements. As well, the developed corridor may help people gain access to destinations without having to board a train or bus. Land use planning and ancillary transportation enhancements (for bicycles and pedestrians in particular) could provide invaluable community resources not generally associated with a transit project, but which are still appropriate goals. The success of MTA's investments can be measured by the extent that they provide customers with access to destinations of their choosing via transportation modes of their own choice. 5

The ability of a fixed transit system to stimulate transit-oriented development is well documented. Merging these development opportunities with the surrounding communities through diverse access routes requires careful consideration in project planning. 6

Documentation of Bikeway Element in the EIR/EIS

Despite the fact that the bikeway may be exempt from needing environmental clearance, this should not preclude including sufficient detail to describe how it will be integrated into the final design and the role it will play in meeting the project's goals. 7

We realize that most bikeway design details are not available at this point in the process. Nonetheless the bikeway should have its own section or subsection in the EIR. Not only is this a practical concern – it is important to group the relevant discussions together to get a better picture of what is planned and the design rationale – but also, scattered placement of bikeway information gives the impression of disregard and a lack of concern. We feel very strongly that the bikeway must be included as an integral part of the Exposition transit corridor, not treated as a side issue. We suggest that the discussion of the bikeway be noted in the Table of Contents. 8

The illustration on page 2-31 (Fig. 2-16) shows the bikeway following the Venice Blvd. / Sepulveda alignment. In fact, the bikeway will follow the original right of way, whether or not the detour becomes a reality. We suggest that these distinctions be made in order to avoid confusion. 9

In addition, the computerized photograph on page 13 of the Executive Summary (also utilized in other related documents) shows a light rail train and a bike path within a few feet of each other with no safety barriers between the two. Since this illustration depicts such a hazardous and unlikely condition, it should either be modified, not used at all or an explanation should be added to acknowledge that the design it depicts is unworkable. 10

Provide Background and Goals

We suggest that the bikeway discussion itself include:

- a brief history of the past decade of Exposition Bikeway planning;
- brief comparisons to similar transit-with-trail projects in the U.S. to place the bikeway concept in a larger context; and
- general goals for the integration of the bikeway with the transit line, connectivity with other L.A. bikeways, and ancillary benefits (green space, recreation, etc.) to the communities it will serve.

11

We would be happy to work with you in researching and writing this discussion.

12

The Importance of Preserving Bike Lanes on Venice Boulevard

While it is planned that the Exposition Corridor Bikeway will follow the original ROW between Robertson and Sepulveda, it is nonetheless critical that the existing bike lanes on Venice Blvd. be preserved even if a transit system is developed there. Venice Blvd. is one of the longest and most heavily-use class-two bike lanes in our region.

13

Extension of the Bikeway

We suggest consideration of extending the bikeway through the non-revenue portion of the ROW

east of Figueroa, in order to connect it to the Los Angeles River Bikeway in the future.

14

Bikeway and Transit System Integration

Bicycles must be approached as a fully-functional part of our transportation system. This goal requires attention to details. A convenient, direct and safe bikeway will attract numerous bicycle commuters as well as enhance access to the transit system.

15

Inclusion of Bike Stations

Bike Stations, similar to the one near the western terminus of the Blue Line in Long Beach, should be included in the Exposition Corridor transit system wherever warranted. The resources they can provide, such as secure parking, bicycle rental, repair, travel information and other related services, will further enhance the utility and viability of the bikeway element of the project. For information about bike stations, see http://www.bikestation.org.

16

Design and Planning Recommendations for Bicycle Facilities

1. Crossings

Roadway crossings are a big challenge for cyclists using separated bike paths. Whenever bicycles enter or cross a roadway after being separated from the motorist's normal area of attention, the potential for unexpected and hazardous conflicts is great. Safe and convenient crossings are essential to cyclist safety. Visibility is a critical factor: motorists must be able to easily see bicyclists that are near to crossings at all times. 17

1.1. Bicyclists should be able to stay seated in the saddle and peddling whenever possible. They should not be required to dismount and walk bikes through crosswalks or conduct portages. Crossings should not impede convenient use. 18

1.2. Avoid large signs, fences, equipment enclosures, landscaping or buildings that could restrict motorists or bicyclists views of each other. 19

1.3. Protect bicyclists by signal phases at intersections with large roads. Consider using bicycle-level signals that give bikes a head start crossing intersections before motor vehicles. See Caltrans-approved bicycle signals in operation in Davis, CA as an example. 20

1.4. Utilize state-of-the-art detectors to sense bicyclists well in advance of an intersection — not just at the intersection itself — to allow the traffic control device to predict bike traffic and accommodate it. 21

1.5. Special attention should be paid to situations where right and left-turning motorists cross the bikeway. It is advisable to lay out the intersection so that motorists complete their turns and are fully facing the bikeway before crossing it (i.e. crossing at 90°'s to the path of bicycles). Avoid conventional crosswalk configurations where the bicycle crossing would be immediately adjacent to the corner where cars turn, creating blind-sight situations. 22

1.6. Utilize attention-getting signs and possibly rumble strip techniques to alert bicyclists to slow down and use caution at all crossings (rumble-strip techniques, if chosen, should be carefully tested by bicyclists before installation). 23.

1.7. At smaller, un-signaled crossings, identify bikeways with bold roadbed markings and other alerts to motorists, such as flashing lights, signs and raised speed tables. (Consider the use of the new, flashing LED roadbed lights as installed on Pico Blvd. in Santa Monica). 24

1.8. Streets with "residential" volumes of car traffic should yield to the bikeway at all times. 25

1.9. Bikeways crossing the transit line should incorporate appropriate caution alerts and protection systems. 26

1.10 Every effort should be made to avoid car traffic turning across the bikeway. 27

2. Bike Path and Lane Transitions

Multiple transitions between Class I to Class II will be detrimental to swift bike transit. Every effort should be made to create a continuous Class I bike path through as much of the corridor as possible. Nonetheless, due to space restrictions in some parts of the ROW, it is likely that sections of the bikeway in these areas will have to follow routing as on-road bike lanes. 28

2.1. Transitions to and from on-road lanes should be designed so bicyclists can negotiate them conveniently and safely. They should not impede swift and convenient use. 29

2.2. When called for, it may be desirable to allow bicycles to merge with traffic and be directed to a specified waiting zone at the head of a left turn lane. With proper signal phasing, 30

this could allow bicyclists to enter a bikeway in the median without having to portage multiple crosswalks.

3. Bikeway Design and Alignment

3.1. Bikeways should be as straight as possible. Designs must avoid the intentional meandering of recreational paths that can slow riders and add unnecessary effort and hazards.

3.2. Maintenance of the bikeway system is crucial to avoid hazardous conditions. Periodic sweeping and other surface maintenance is a necessity.

3.3. Because current transit system alignment plans call for avoiding the Cheviot Hills area, it is logical to allow the bikeway to follow this alignment. This would give bicyclists a more direct route. However, even with this routing, the existing class-two bike lanes on Venice Boulevard should remain intact, as they are well used and enhance mobility in the corridor.

3.4. Provide adequate separation between pedestrians and bicyclists. Experience has shown that it is nearly impossible to discourage pedestrians from bike paths. Adequate width to accommodate faster traffic is essential to the success of this project as a commuter facility.

4. Transit System Access

Multi-modal travel with a bicycle requires that cyclists have safe and convenient access to the transit system at both ends of the trip.

4.1. Access to Stations. Bicycle riders should have safe convenient routes to station facilities from nearby roads. This should avoid routing bicycles through automobile parking lots.

4.2. Bicycle Parking

4.2.1. Stations must have adequate space dedicated to bicycle parking and allow for expansion if heavy use dictates.

4.2.2. Bicycle parking should be provided in the form of both racks and lockers.

4.2.3. Bicycle parking locations must discourage theft:

4.2.3.1. Site bike parking near areas with heavy pedestrian presence or where an attendant who is always present has clear view of the lock-up site.

4.2.3.2. Locate bicycle parking as far from roads and driveways as possible. Bike thieves often use enclosed vehicles to facilitate their work. The closer a vehicle can get to bikes, the more at risk they are.

4.2.3.3. Avoid siting bike parking in out-of-the way, less-visible locations, or where a motor vehicle can block the view of it.

5. Transit Vehicle Access

Allowing bicycle riders to bring their bikes with them enhances multi-modal transit system use and cost effectiveness. This allows bicyclists to use the bikeway for as much of their journey as possible, and access the transit system for the remainder.

5.1. All-hours access is imperative. Without this, transit access is of limited utility. The system must attract cyclists especially during peak hours.

5.2. When bikes are brought on board, adequate, easy-to-access space should be available. The Caltrain between San Francisco and San Jose is a good example of rail that provides set-aside space for bikes. They have 24-bike capacity on each train, and sometimes 48.

It functions very successfully. Not having designated space for bikes is asking for conflicts with other riders. The BART system is an example of this. There is no designated space for bikes, so other passengers get annoyed when they are leaned against seats, etc.

5.3. For bus systems with raised-platform, prepaid boarding, allowing bikes to be brought on board is preferable to exterior racks. 47

5.4. Bicycles brought on board transit vehicles should not required to have special permits and fees. 48

5.5 Consider providing ramps that would allow cyclists direct access to platforms from the bikeway. 49

LACBC is Ready and Willing to Help Create the Expo Bikeway

The bikeway element exists as part of the conceptual study for the Exposition Corridor to a great extent because LACBC, as an organization, pushed so hard for it. Originally planned as a bikeway only, we believe that the Transit-With-Trail configuration has even greater potential to change the way Los Angeles feels about biking, and about transportation. Our membership has proven itself to be experienced, creative, and hard-working in support of bicycling in Los Angeles. We look forward to working with you in the creation of this unique and valuable corridor. 50

Sincerely,

Kent Strumpell
Co-Chair, Technical Advisory Committee
LACBC

Ron Milam
Executive Director, LACBC

LACGC (1)

Los Angeles Child Guidance Clinic

A Non-Profit Community Based Agency Serving Children and Families Since 1924

www.lachild.org

MAIN OFFICE
3787 S. Vermont Avenue
Los Angeles, CA 90007
ADMINISTRATION
(323) 766-2360
Fax (323) 766-2370
OUTPATIENT
(323) 766-2345
Fax (323) 766-3636
NORTON GRIFFIN SCHOOL
(323) 766-2340
Fax (323) 766-2350

ADAMS OFFICE
1115 W. Adams Bl. #201
Los Angeles, CA 90007
(213) 765-9388
Fax (213) 765-0670
BROADWAY OFFICE
Families In Touch
7410 S. Broadway
Los Angeles, CA 90003
(323) 789-4949
Fax (323) 789-4952
CRENSHAW OFFICE
4401 Crenshaw Bl. #300
Los Angeles, CA 90043
(323) 290-8360
Fax (323) 290-8366

BOARD OF DIRECTORS
John R. Liebman, Esq.
Chairperson
Stephen D. Royer
Chairperson-Elect
Quinton C. James, M.D.*
Vice Chairperson and Immediate Past Chairperson
Edgar H. Twine, Esq.
Secretary
Michael W. Stoddard
Treasurer
Elaine Carey
Nominating Committee Chairperson
Sandra Berg
Robert S. Brachman
Rolland E. Cooper
Betty J. Friedlander
Eugene Friedlander
David L. Hirsch*
Mark S. Louchheim*
Robin L. Moody
Cynthia A. Telles, Ph.D.
Thomas E. Trott, M.D., Ph.D.
Samuel M. Victor
Gary Williams, Esq.
Virginia M. Wilson*

HONORARY DIRECTORS
Lucille G. Boswell*
Gloria Caesar
Mrs. Charles Luckman*
Ruth Shelby
* *Chairperson Emeritus*

Elizabeth W. Pfromm, M.S., M.P.A.
Executive Director

June 11, 2001

The Honorable Yvonne Brathwaite Burke
Chairperson - Los Angeles County
Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, California 90012

RE: MID-CITY/WESTSIDE TRANSIT CORRIDOR - Draft EIS/EIR

Dear Madame Chair:

The Los Angeles Child Guidance Clinic is a member of the Exposition Park Stakeholders Ad Hoc Committee on Traffic, Circulation and Parking. We support the stakeholders' position conveyed in its June 1, 2001 letter. I wanted to take this opportunity to amplify two particular points. 1

An at-grade transit system along Exposition Boulevard between Figueroa Street and Vermont Avenue would truly create a physical and psychological divide between the areas to the north and south. The Clinic endorses a below-grade tunnel in the area while also seeking assurances that such a system would continue a sufficient distance west of the Vermont/Exposition intersection. As you know, the Clinic operates a well-attended children's mental health center at this intersection, inclusive of a non-public school. With the recent construction of the DPSS building just south of the Clinic, there will be a very high concentration of visitors and employees at and near the Vermont/Exposition intersection. 2

Second, the greening of the dedicated median along Exposition Boulevard, between Figueroa and Vermont, has added a much desired asset to the community. One has only to cast their eyes on the unimproved section of Exposition Boulevard, just west of Vermont, to appreciate the value of the Exposition Park beautification project. A below-grade system preserves this desirable community asset. 3

Thank you for this opportunity to expound on the previously expressed Exposition Park Stakeholders' positions. 4

Sincerely,

Elizabeth W. Pfromm, M.P.A., M.S.
Executive Director

cc: Exposition Park Stakeholders
MTA Board Members

* Accredited by the Commission on Accreditation of Rehabilitation Facilities
* A Charter Agency of the United Way of Greater Los Angeles
* A Short Doyle Contractor of the County of Los Angeles
* Affiliate of USC Keck School of Medicine, Division of Child and Adolescent Psychiatry
* A Non-Public School Contractor of the Los Angeles Unified School District

Los Angeles County Metropolitan Transportation Authority
Mid- City/Westside Transit Corridor
Draft Environmental Impact Statement/Report

U.S. Department of Transportation
Federal Transit Administration

LC(1)

COMMENTS

Please use this page to submit your comments about the Draft Environmental Impact Statement/Report (DEIS/EIR) on the Mid-City/Westside Transit Corridor. You may discuss any aspect of the project in which you are interested.

5/7/2001

Just reiterating—

We (The Miracle Mile Civic Coalition and the Wilshire Advocates Coalition) continue to oppose the BRT dedicated Busway on Wilshire Blvd. and Favor the BRT on the Expo. Line. 1 2

We are learning recently more and more about the considerable support for the Exposition Line. 2

Our letter to you will follow, regarding our desire to cooperate with elected officials on a Fiscally sound Final choice.

(If necessary, please continue your comments on the reverse side of this paper.)

To receive information regarding the Mid-City/Westside Transit Corridor DEIS/EIR, please complete the information below

Name Lyn MacEwen Cohen Phone/Fax (323) 937-6574
Founder, Miracle Mile Civic Coalition
Address 201 N. Rossmore Avenue
City/State/Zip L.A., Ca. 90004

and Wally Marks III, President

Mail sheet by Friday, June 15, 2001 to:
MTA, ATTN: David Mieger, One Gateway Plaza, Mail Stop 99-22-5, Los Angeles, CA 90012
(310) 366-6443 Fax: (213) 922-3060 E-Mail: MidCityWestside@mta.net

LUF 03

LATINO URBAN FORUM

improving the quality of life in latino communities

June 13, 2001

Los Angeles County
Metropolitan Transportation Authority
One Gateway Plaza
MS 99-22-5
Los Angeles, CA 90012
Attn: David Meiger

RE: Mid/City Westside Transit Corridor EIS/EIR

Dear David Mieger,

The Latino Urban Forum (LUF) supports Alternative Three of the Mid/City Westside Transit Corridor EIS/EIR Study. Alternative Three, which is a dedicated bus lane along Wilshire Boulevard and a light rail line along Exposition Boulevard, would greatly improve mobility in the region especially for working and middle class Latinos who work in the job-rich Westside. 1

Thousands of Latinos pour into the Westside daily from all over LA. The Westside is the only region not served by effective rapid transit. Latinos rely heavily on public transportation and the strategic link with LA's other rail lines will allow commuters a predictable and rapid connection to job opportunities instead of battling the 1-10 freeway, congested boulevards and overcrowded buses. 2

LUF is dedicated to improving the quality of life in Latino communities' through the built environment. We believe that these transit projects stated in Alternative Three will improve the quality of life for all residents. 3

Sincerely,

Dr. Ramon Garcia
Latino Urban Forum

www.latinourbanforum.org
725 S. Spring Street, Los Angeles, CA 90014 213.629.9122 LUF00@hotmail.com

MUSIC·CENTER
PERFORMING ARTS CENTER
OF LOS ANGELES COUNTY

June 4, 2001

The Honorable Richard Riordan
Office Of The Mayor
200 North Main Street, Suite 800
Los Angeles, CA 90012

Dear Mayor Riordan:

I am writing on behalf of the Music Center in support of light rail in the Exposition Corridor. We believe this transit alternative provides a desirable way to alleviate traffic congestion and improve access to the cultural destinations in downtown Los Angeles. 1

Approximately 1.6 million guests attend performances at the Music Center each year. The Cathedral of Our Lady of the Angels will be completed in 2002, and the Frank O.Gehry-designed Walt Disney Concert Hall will open its doors to the public in 2003. Each venue will attract an estimated 1 million visitors in its first years. In addition, many more visitors enjoy the Colburn School, MOCA, and Public Library, all located within a few blocks in the Grand Avenue cultural corridor. The Music Center favors public transit options that will allow the broadest possible audiences to attend events at these cultural institutions easily, without the current disincentives of traffic congestion and parking costs. 2

Sincerely,

Patti Gagan
Director
Government Relations and Planning

135 NORTH GRAND AVENUE · LOS ANGELES CALIFORNIA 90012 · WWW.MUSICCENTER.ORG

OMAR IBN AL KHATTAB FOUNDATION

Dr. Mahmoud M. Fakhal
President
E-MAIL [illegible]@aol.com

June 12, 2001

The Honorable Yvonne Brathwaite Burke
Chairperson,
The Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

RE: Mid-City Westside Transit Corridor Draft EIS/EIR

Dear Supervisor Burke:

On behalf of the Board of Trustees and the community of Omar Ibn Al Khattab Foundation and Masjid Omar Ibn Al Khattab I am writing to provide our input on the proposed **Mid-City Westside Transit Corridor Draft EIS/EIR**. Dating back to 1990, while Masjid Omar was still under construction, the Foundation has been engaged in discussions, with other Exposition Park stakeholders, and actively supportive of developing a quality transportation system the that would connect and provide communities from other parts of Los Angeles access to the educational, historic, scientific, cultural and religious institutions in the USC/Exposition Park neighborhood and the surrounding community. 1

We believe that this can be achieved without negatively impacting or undermining the partnerships, collaborations and programs that have developed amongst the neighboring institutions and the outreach programs that serve our neighboring communities. Over the years your personal support and leadership have contributed to the success of many of these projects. There are currently several community related projects in University and Exposition Parks in various stages of development. We are fearful that the momentum that has been fueling the resurgence of the neighborhood might be brought to an abrupt halt if the MTA Board approves the proposed surface level bus link with the Westside. 2

We are concerned that the proposed Mid-City Westside Transit Corridor Draft EIS/EIR did not take into consideration the positive changes and revitalization that have taken place in the in the neighborhood, the resurgence of Exposition Park over the last ten years or the collective efforts of our elected officials, private, public and non profit institutions or the business, educational and business communities that has resulted in a renaissance in Exposition Park and the neighboring community. 3

The proposed plan has not taken into account the vision or future plans of stakeholders to further elevate conditions and improve the quality of life in the neighborhood. Last November the Omar Ibn Al Khattab Foundation purchased the property on the north/west 4

Web Site: www.omarfoundation.org
1025 W. Exposition Blvd., Los Angeles, California 90007 USA - Phone: (323) 733-9938 Fax: (323) 733-4807

OMAR IBN AL KHATTAB FOUNDATION

corner of Exposition /Vermont for the purpose of constructing the multistory Omar Learning Center for the Arts, Science and Technology

The Learning Center will house an Islamic library, an exhibit hall that would have permanent and visiting exhibit from the Islamic world, a lecture hall, gift/book store and as part of the Foundation' outreach programs a skills upgrading program for adults and a tutoring and enrichment program to be offered free of charge to adults in the daytime and neighborhood schools students in the afternoon. A below-ground tunnel to accommodate LRT would enable neighborhood school children, USC students and faculty members, members of the community and the general public easy and safe access to the learning center. 5

An over-ground bus or line will jeopardize existing and future partnerships amongst the stakeholders and would isolate the institutions from each other and from the neighboring families. The safety and well being of neighboring children and pedestrians would be at risk if they have to navigate their way across a busy transit corridor. The safety of the three thousand families who worship at Masjid Omar and attend Friday and Ramadan services on a regular basis would also be put at risk. 6

Omar Ibn Al Khattab Foundation and Masjid Omar Ibn Al Khattab are in favor of light rail tunnel that would that would not disrupt life or threaten the safety of those who live, work, attend school, worship in the USC/Exposition Park neighborhood. This alternative solution provides increased safety to the neighborhood children, who have to cross Exposition and Vermont to attend school and to enjoy the educational, cultural, scientific and recreational programs provided at Exposition Park and the neighboring institutions and to members of Masjid Omar's congregation, many of who walk from USC and the neighboring communities. 7

We are hopeful that with your leadership the Los Angeles County Metropolitan Transportation Authority would consider the alternatives submitted by Foundations and other stakeholders, who are committed to an efficient, quality, pollution free transportation system as well as insuring that renaissance at Exposition Park continues to prosper and serve the neighboring communities 8

The Omar Ibn Al Khattab Foundation is committed to working with the MTA find an option that serve the commuters and the USC/Exposition Park community. 9

Sincerely,

Dafer M.Dakhil, Director,
Community Development & External Affairs

OMAR IBN AL KHATTAB FOUNDATION

cc: MTA Board Members

Michael Antonovich
Hal Bernson
John Fasana
Don Knabe
Jose Lagaspi
Gloria Molina
Beatrice Proo
Richard Riordan
Frank C. Roberts
Jeffrey Walden
Zev Yaroslavsky

Councilpersons
Mark Ridley-Thomas
Rita Walters

State Senator Kevin Murray
Assemblyman Roderick Wright
LAUSD Board Member Genethia Hudley Hayes

Exposition Park Stakeholders
Ted Alexandra, Los Angeles Unified School District
John C. Argue, University of Southern California
John Black, Hoover Project Area Committee
A.Bingham Cherrie, University of Southern California
Mahmoud M. Dakhil, Omar Ibn Al Khattab Foundation
Margaret Farnum, Coliseum Commission
Elizabeth Fromm, Child Guidance Clinic
Genethia Hayes, LAUSD Board Member
Jamesina Henderson, California African American Museum
Darryl Holter, Figueroa Corridor Partnership
Shelby Jordan, Community Resource Talent Development
Shirley Kelley, Exposition Park Manager
Levi Kingston, Community Consortium
Patrick Lynch, Coliseum and Sports Arena
Thomas H. Moran, University of Southern California
Ellen Oppenheim, Department of Recreation and Parks
Jane G. Pisano, University of Southern California
James Powell, Natural History Museum
David Roberts, Offices of Councilman Mark Ridley-Thomas
Jeffery Rudolph, California Science Center
Steven B. Sample, University of Southern California

PW HA(1)

SCANNED IN RMC

PARK WILSHIRE

June 5, 2001

Mr. David Mieger, Project Manager
Los Angeles County MTA, One Gateway Plaza
Mail Stop 99-2-5, Los Angeles, CA 90012

Dear Mr. Mieger:

On behalf of the approximately 370 residents and employees of the Park Wilshire, we strongly oppose the proposed installation of the Wilshire Bus Rapid Transit (BRT) by the MTA. 1

The Wilshire Boulevard Corridor (between Comstock and Westwood Boulevards) is already adversely impacted by the combination of high volume, excessive speed, dangerous turn conditions, frequency of collisions, accidents, and traffic noise. Speeding buses in exclusive lanes will only add to the congestion woes of this heavily traveled Boulevard. 2

Our elderly can no longer cross the Boulevard safely now at the intersections in the time allotted! Vehicles can be observed daily passing through red lights or cheating on the yellow light as they speed on the Boulevard. Cars exiting from the buildings on the Corridor are only managing to do so because of the jut-outs protecting them from oncoming traffic. Eliminating the center turn lanes will only further prohibit homeowners and residents from entering their buildings safely and conveniently. One can envision more accidents and fatalities as people stand indefensible on center islands from "run away" vehicles or try to "run" across Wilshire to catch a bus. 3

In the afternoon/early evening period, in the westerly direction, there are daily traffic backups from the 405 Freeway back through the Corridor because of Freeway congestion. Cars are barely moving, bumper-to-bumper, suddenly changing lanes, going into side streets and coming out on Wilshire again, with frustrated drivers trying to gain some advantage to reach the Freeway. The amount of air and noise pollution emanating from this stagnant mass of cars and buses is horrendous. 4

Any new lanes for express buses would quickly see themselves filled up with these same frustrated drivers and their vehicles to no advantage to the proposed lanes! Policing might help in the first few days but afterwards there will be no advantage to the bus rider. These buses will just be spewing out their emissions to the high-rise residents as they idle and fight for position in this section of the Boulevard. It is a dream to believe that this proposal will be a solution to population growth. The EIR is astonishingly biased and 5

PARK WILSHIRE HOMEOWNERS ASSOCIATION, Inc.
10724 Wilshire Boulevard Los Angeles, California 90024
Fax 310-441-3576
Tel. 310-441-3500

misleading in its view of the environmental and safety impact on the residents and employees of the Corridor.

The potential decrease in vehicle lanes to accommodate the bus lanes will breed an increase in CO emissions as traffic moves slower on balance through the area. Your EIR is negligent in not assuming an increase in pollution in certain pockets of Wilshire Boulevard such as would occur on the Corridor. Your statistics may hold up on average for the entire length of Wilshire Boulevard, but you would certainly adversely impact the pollution circumstances on the Corridor! 6

We contend that the Wilshire Corridor is one of the highlight residential areas of Los Angeles and should not be disturbed. One obvious suggestion to improve bus schedules on the Boulevard is to move ALL bus stops to the post-crossing position after intersections, not before intersections as many are situated now. New York City experience has seen sharp improvement in transportation cycles by moving all bus stops to after the intersection. 7

In section 3.13, the assumption that there will be a reduction of fuel consumption is questionable when one considers the increased slowdown of vehicles idling in the Corridor because of the Freeway congestion. 8 In section 3.14, making people walk a number of blocks at night from new off-Wilshire parking locations from a side street location makes security a significant consideration as opposed to the EIR's "less than significant" conclusion. 9 Why would you want to destroy the beautiful makeup of this quiet side street community to introduce parking lots? 10

To make the Wilshire Corridor into a bus speedway (or a rail speedway) is one of the most ridiculous ideas ever proposed. The time saved by these speeding buses can only be considered minimal when one factors in the potential new hazard to the health and safety of the community. There will be insurmountable massive resistance because of the safety considerations, the noise, traffic upheaval, the impossible deliveries conditions, the inconvenience of a 24-32 month construction upset, and adverse impact on property values that your proposal risks for the community. 11

We encourage you to consider the light rail alternative along Exposition as being more sensible than "damaging" this outstanding residential area of the city. Thank you for your consideration. 12

Sincerely,

Park Wilshire Board of Directors

SCANNED
IN RMC

R-1

UNIVERSITY OF CALIFORNIA, LOS ANGELES

UCLA

BERKELEY · DAVIS · IRVINE · LOS ANGELES · RIVERSIDE · SAN DIEGO · SAN FRANCISCO · SANTA BARBARA · SANTA CRUZ

JUL 27 2001

July 24, 2001

DEPARTMENT OF HEALTH SERVICES
SCHOOL OF PUBLIC HEALTH
LOS ANGELES, CALIFORNIA 90095-1772

Mr. David Mieger, Project Manager
Los Angeles County MTA, One Gateway Plaza
Mail Stop 99-2-5, Los Angeles, CA 90012

Dear Mr. Mieger:

On behalf of the approximately 370 residents and employees of the Park Wilshire, we strongly oppose the proposed installation of the Wilshire Bus Rapid Transit (BRT) by the MTA. 1

The Wilshire Boulevard Corridor (between Comstock and Westwood Boulevards) is already adversely impacted by the combination of high volume, excessive speed, dangerous turn conditions, frequency of collisions, accidents, and traffic noise. Speeding buses in exclusive lanes will only add to the congestion woes of this heavily traveled Boulevard. 2

Our elderly can no longer cross the Boulevard safely now at the intersections in the time allotted! Vehicles can be observed daily passing through red lights or cheating on the yellow light as they speed on the Boulevard. Cars exiting from the buildings on the Corridor are only managing to do so because of the jut-outs protecting them from oncoming traffic. Eliminating the center turn lanes will only further prohibit homeowners and residents from entering their buildings safely and conveniently. One can envision more accidents and fatalities as people stand indefensible on center islands from "run away" vehicles or try to "run" across Wilshire to catch a bus. 3

In the afternoon/early evening period, in the westerly direction, there are daily traffic backups from the 405 Freeway back through the Corridor because of Freeway congestion. Cars are barely moving, bumper-to-bumper, suddenly changing lanes, going into side streets and coming out on Wilshire again, with frustrated drivers trying to gain some advantage to reach the Freeway. The amount of air and noise pollution emanating from this stagnant mass of cars and buses is horrendous. 4

Any new lanes for express buses would quickly see themselves filled up with these same frustrated drivers and their vehicles to no advantage to the proposed lanes! Policing might help in the first few days but afterwards there will be no advantage to the bus rider. These buses will just be spewing out their emissions to the high-rise residents as they idle and fight for position in this section of the Boulevard. It is a dream to believe that this proposal will be a solution to population growth. The EIR is astonishingly biased and 5

ASSOC

RA

misleading in its view of the environmental and safety impact on the residents and employees of the Corridor. 6

The potential decrease in vehicle lanes to accommodate the bus lanes will breed an increase in CO emissions as traffic moves slower on balance through the area. Your EIR is negligent in not assuming an increase in pollution in certain pockets of Wilshire Boulevard such as would occur on the Corridor. Your statistics may hold up on average for the entire length of Wilshire Boulevard, but you would certainly adversely impact the pollution circumstances on the Corridor! 7

We contend that the Wilshire Corridor is one of the highlight residential areas of Los Angeles and should not be disturbed. One obvious suggestion to improve bus schedules on the Boulevard is to move ALL bus stops to the post-crossing position after intersections, not before intersections as many are situated now. New York City experience has seen sharp improvement in transportation cycles by moving all bus stops to after the intersection. 8

In section 3.13, the assumption that there will be a reduction of fuel consumption is questionable when one considers the increased slowdown of vehicles idling in the Corridor because of the Freeway congestion. In section 3.14, making people walk a number of blocks at night from new off-Wilshire parking locations from a side street location makes security a significant consideration as opposed to the EIR's "less than significant" conclusion. Why would you want to destroy the beautiful makeup of this quiet side street community to introduce parking lots? 9 9

To make the Wilshire Corridor into a bus speedway (or a rail speedway) is one of the most ridiculous ideas ever proposed. The time saved by these speeding buses can only be considered minimal when one factors in the potential new hazard to the health and safety of the community. There will be insurmountable massive resistance because of the safety considerations, the noise, traffic upheaval, the impossible deliveries conditions, the inconvenience of a 24-32 month construction upset, and adverse impact on property values that your proposal risks for the community. 10

We encourage you to consider the light rail alternative along Exposition as being more sensible than "damaging" this outstanding residential area of the city. Thank you for your consideration. 11

Ronald Anderson
Diane Anderson
312

AMITAUR CONSTRUCTS
8559 HIGUERA STREET CULVER CITY, CALIFORNIA 90232 T(310)204-4464 F(310)204-4465
EMAIL: samitaur@SAMITAURCONSTRUCTS.com
T(310)838-4969

Los Angeles County Metropolitan Transportation Authority
Attn: Mr. David Mieger
One Gateway Plaza
MS 99-22-5
Los Angeles, CA 90012

June 11, 2001

Dear MTA Members and Staff:

We are submitting the following general and specific comments regarding the Mid-City/Westside Transit Corridor Draft EIR/EIS (the "EIR") on behalf of ourselves and the Hayden Tract property owners and tenants. 1

General Comments:

The Hayden Tract property owners have always worked with the surrounding neighborhoods. When the MTA fails to listen to them, they are failing to listen to us as well. 2

The speed of the trains and buses that were proposed for the Jefferson and National Boulevard corridor seemed high. Your analysis of safety, traffic, noise, and vibration seemed to be lacking. Therefore, this left us frightened that the Impact Report was faulted. Your report has left us with more questions than answers. 3

Specific Comments:

We had been told that the buses or trains would be submerged, meaning that any sound impacts would be minimal. Now we learn that that they will run on the surface. That is a big change. One that is not good. 4

The traffic in the area at rush hour is already congested. Adding to the confusion with traditionally conceived surface transportation would be a disaster. A new format is required to make transportation here a success. 5

We have parking lots in the MTA median on National Boulevard. If they are lost, some of that parking will be switched to the surrounding neighborhoods. We could not protect the residential areas from that impact. 6

The enormous wall that the MTA is proposing between the residential neighborhood and the Hayden Tract would separate the two communities. Many of the residents in the area work in the Tract, and several of them walk to work from their homes. These people would no longer be able to get to work as easily as before, severely impacting the very reason that some of them moved to that residential area in the first place. 7

Historically, the housing tract in part grew up around the Hayden Tract because people who worked there wanted to live near their place of employment. This situation has not changed: Today there is more demand from people working in the Tract to find housing in the residential area than that area can provide; for this reason, when homes come on the market, they are snapped-up within a few days. This raises another item that is missing from your Impact Report: What about the additional traffic and lack 8

of parking that will be created by those residents who for the first time have to drive to work in the Hayden Tract?

Another adverse impact on our neighborhood would be the visual quality of this twelve-foot-high wall. We, as well as other property owners in the Hayden Tract, have spent millions of dollars creating buildings of strong design merit, in an effort to improve the look of the area. As a matter of fact, almost all of our buildings have won local, State, and National design awards, as well as national and international press coverage for their exceptional architecture. The residents north of National Blvd. have come to enjoy their direct views of many of these buildings; in addition, those views, compared to what was there before, have increased their property values. The proposed prison-like wall would bring all of that to an end. 9

It would also severely impact the long-standing beneficial relationship between the residents and the Hayden Tract that we have commented on above. The neighborhoods presently compliment each other. Their security is intertwined. The "neighborhood watch" helps watch the businesses in the Tract; the participants in the businesses, and our security guards, watch the residential community. Therefore, crime is low. If the wall is implemented, crime in the area might increase. 10

For all the above reasons, the sound mitigation you are proposing - the wall - would eliminate the interaction and interdependence of our business and residential communities. This would be a major mistake. 11

Most importantly – and contrary to your report - any significant increase in sound in the area, along with the addition of vibrations where currently there are none, would adversely impact business in the Hayden Tract. Through fifteen years of hard work and large investment this old industrial zone has been redeveloped to now include sound stages and sound studios (including those of America On Line), high-profile motion picture and internet production companies (such as Viant, HIS, SONY Pictures, Anonymous Content, HBO, and 20th Century Fox), internationally renowned advertising and marketing firms (such as the West Coast Headquarters for Ogilvy & Mather), Academy Award-winning "special effects" companies (like Mannix), and several dot-com and high-tech companies (Kodak, Be Free, Luna, and HPG Holdings, to name a few) who depend on the present quiet and stable environment for their many computers to function properly. 12

These companies, and a long list of other businesses, would find the increase in disruptive sound-levels, as well as continual periodic vibrations, extremely detrimental to their ability to conduct business. An economic down-turn would occur if these environmental impacts were not controlled. Many businesses might be forced to leave in order to survive.

The Hayden Tract also has arguably the most famous dance studio in the L.A. Basin: *The Conjunctive Points Dance Center*, where recently the Broadway and T.V. star Debbie Allen has established the first professional dance academy in the history of Los Angeles. Dancing on trembling floors, and struggling to hear the music over the sound of the passing light-rail or buses, will add unnecessary impediments to these children's ability to learn their chosen profession. Debbie Allen sought out the peaceful atmosphere of the Hayden Tract, as opposed to a main thoroughfare, in which to establish her business. The Willows Community School and another private 13

SAMITAUR CONSTRUCTS

school, Turning Point, undoubtedly came here for similar reasons. Is any of this information in your EIR?

And of course, the infamous Alquist-Priolo earthquake fault zone runs right through the area. You seem to have missed that point in your Environmental Impact Report. This fact alone should be reason enough to conclude that your analysis of our neighborhood is severely lacking. 14

We in the Hayden Tract do not oppose improved public transportation; we favor it. It would benefit us all. As a matter of record, we at Samitaur Constructs have made a financial commitment to the City of Culver City to participate in the implementation of a bike path along the Exposition Right-of-Way. We have also proposed for many years to do a joint-venture with the MTA to create a precedent-setting new type of public transportation depot, with environmentally-sound transportation vehicles, and high-level architecture and landscape design. Our reputation for excellence in urban development is well known, and that proposal remains on the table. But that should not be the focus of this letter. 15

Our strong concern is that all the critical issues surrounding the MTA's current proposal have not been adequately analyzed or addressed. The future of the life of an entire neighborhood - both commercial, new industrial, and residential - is at stake here. Precipitous action could provoke another Hollywood fiasco. We, the property owners of the Hayden Tract, want to work with you to help prevent negative impact before it occurs. Please give us this opportunity. 16

Yours truly,

Frederick Samitaur Smith
Laurie Samitaur Smith
Frederick and Laurie Samitaur Smith

cc: The Culver City Council and Redevelopment Agency

SAMITAUR CONSTRUCTS

SCANNED
IN RMC

JUN 08 2001

SANTA MONICA
CHAMBER OF COMMERCE
BUILDING A THRIVING COMMUNITY SINCE 1925

June 6, 2001

Mr. David Meiger, Project Manager
Los Angeles County MTA
One Gateway Plaza
Mail Stop 99-22-5
Los Angeles, CA 90012

BUSINESSES

Re: Proposed Light Rail System

Dear Mr. Meiger:

This communication is to confirm Santa Monica Chamber of Commerce support for a Light Rail System along the Exposition Right of Way that would end in Santa Monica and result in the eventual goal of serving Santa Monica residents. 1

This statement was at the heart of the motion that was unanimously approved by the Chamber's Board of Directors over a year ago and remains our conviction to this day. Prior to that decision, our Government Affairs and Parking and Traffic Committees studied this issue and recommended approval of the motion to support a Light Rail System. 2

We firmly believe that such a system will, in the long run, be the most productive and best serve Santa Monica residents, visitors and businesses, alike. While we recognize the enormous challenges, both in time and money, of implementing such a system, we also recognize that this is the best transportation option we have. Your leadership and the decision to approve the Light Rail System will be greatly appreciated. 3

Very sincerely,

Daniel L. Ehrler
Executive Vice President

501 Colorado Avenue, Suite 150 | Santa Monica, California 90401-2430 | 310-393-9825 | Fax 310-394-1868 | www.smchamber.com

St. Paul's Presbyterian Church (USA)

Men's Council
5100 Coliseum Street
Los Angeles, California 90016
(323) 292-0471

February 23, 2001

Councilman Mark Ridley-Thomas
Council District 8
200 North Main Street, Room 501
Los Angeles, Ca. 90012

Dear Councilman Ridley-Thomas

Please support construction of a light rail line on Exposition right-of-way. 1

As you are well aware, traffic in Los Angeles, especially on the 10 freeway, is becoming increasingly congested. We can ease this problem by building a light rail line from downtown to Santa Monica on land that is already owned by the MTA. 2

This project would provide enormous benefits to our congregation. By connecting communities along the Exposition corridor to the rest of the Los Angeles region's emerging rail network, this light rail line would ease our traffic problems and allow many more members easy access to our church, also increase significantly our members' work, shopping, and cultural opportunities. 3

With local population expected to increase by the size of two Chicago's in the next 20 years, we need light rail to attract people to public transit – a goal which bus ways cannot accomplish. 4

Popular and proven in an increasing number of American cities, light rail is less polluting than buses and carries more passengers while operating at lower costs. An Exposition rail lien would connect Angelinos of all ethnicities and classes, and open educational, recreational and job opportunities especially to youth, the poor, and the elderly who depend on mass transit. 5

The time to act is now. We heartily endorse this project, and urge you to do all within your power to make a light rail line on Exposition a reality. 6

Sincerely,

DeVaughn Lee
President

IN RMC
MAY 18 2001

TRACT NO. 7260 SSOCIATION, INC.

2005 Kerwood Avenue, Los Angeles, CA 90025-6006 Fax or Phone: (310) 277-6505

President
Diane Wick

Vice-President
Mike Eveloff

Secretary
Richard S Harmetz

Treasurer
Mark Robbins

Board of Directors
Clyde Augustson
Marie Epstein
Michael Eveloff
E. L. Garrison
Richard S Harmetz
Kurt Herrmann
Irving Hirschfield
ty Hoffen
rley Kiley
Mark Robbins
Richard Smith
Sue Sokol
Hannah K. Solomon
Edward Wahl
C. Z. Wick
Diane Witz

May 15, 2001

Mr. David Meiger
Metropolitan Transportation Authority
One Gateway Plaza, MS-22-5
Los Angeles, CA 90012

Dear Mr. Meiger:

The Tract No. 7260 Association, Inc., is an organization that serves homeowners located between Fox Hills Drive and Beverly Glen Boulevard and between Pico and Santa Monica Boulevards. 1

At its monthly meeting last night, the Board of Directors of the Tract No. 7260 Association voted to support the proposal to construct a light rail line on the proposed Exposition Boulevard route. 2

The consensus of the Board was that light rail would serve more people than busses and do less injury to the environment. 3

Furthermore, it was felt that the proposed line would be an efficient means of transporting people to and from their jobs and the beach. 4

The Tract No. 7260 Association urges the Metropolitan Transportation Authority to favor light rail on the Exposition Boulevard route over the alternatives. 5

Sincerely,

Richard S Harmetz

Richard S Harmetz, Secretary
Tract No. 7260 Association, Inc.

Copies: Supervisor Yaroslavsky, Councilman Feuer, Diane Witz

SCANNED
IN RMC
JUN 15 2001

TURNINGPOINT

The Perfect Balance

Deborah Richman
Head of School

David Mieger, Project Manager
Los Angeles County MTA
One Gateway Plaza
Mail Stop 99-22-5
Los Angeles, CA 90012

June 12, 2001

Dear Mr. Mieger,

I would like to express my disappointment regarding the inadequacy of the Environmental Impact Report for the Exposition Right of Way. The use of the Exposition Right of Way will have a very negative impact on the neighborhood surrounding TURNINGPOINT School, a Pre-, Elementary, and Middle School on National Boulevard along the route of the Right of Way.

I certainly agree with the local residents of Culver City when they say that this EIR is inadequate and incomplete. It fails to identify several elementary schools, pre-schools, sound studios and other sensitive environments in our neighborhood. It does not analyze or address the project's impacts on these uses or on the City's General Plan. It completely ignores the residential neighborhood south of the ROW in Culver City: our neighborhood.

It proposes unreasonable and unacceptable "mitigation measures" (like 12ft sound walls) and does not study the impacts of those measures. It does not address traffic impacts on congested intersections near the ROW (like Washington and La Cienega, just around the corner from our school). It does not adequately address the privacy impacts of elevated rail adjacent to single family residences. It does not address the impacts of pedestrian access from our neighborhood to restaurants and other amenities to the south of the ROW or from the areas south of the ROW to the park north of the ROW. It notes the earthquake special study zone and potential for liquefaction in our neighborhood, but does not analyze the impact with respect to vibration, safety, etc.

I encourage you to take another look at this EIR and the vital information that has not been considered in the study or presented in the report.

Sincerely,

Deborah Richman

Deborah Richman
Head of School

DR/ajs

8780 National Boulevard, Culver City, California 90232 • (310) 841-2505 / (310) 841-5420 Fax • www.[illegible]

CERTIFIED
The Best New Cars Make The Best Used Cars
www.toyota.com • 1-800-Go-Toyota

126 letters

West Of Westwood HOA
POB 64496
Los Angeles, CA 90064

June 10, 2001

Mr. David Meiger
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
MS-99-22-5
Los Angeles, CA 90012

RE: Mid City/Westside Transit DEIS/DEIR

Dear Mr. Meiger:

I am writing on behalf of the **members** of West of Westwood HOA, representing approximately 1000 households in Rancho Park, encompassing both sides of the Exposition ROW between Kelton and Sepulveda Blvd. and south of the ROW between Sepulveda and Sawtelle. 1

We recently explained the alternatives to our members and asked them to respond back to us with their views. All responses (except one renter) were in support of Alternative 1. 2

The Exposition ROW has no current proven ridership. It has been decades since the ROW was used as a transit line. The deviation travelling through commercial activity centers and not through residential areas increased the ridership on the ROW. When the line was built 50 years ago there were few homes facing the ROW and the only activity center was Downtown Los Angeles. 3

The huge success of the Rapid Bus on Wilshire proves that people **will ride a bus** if it moves them faster. The Wilshire line runs from Santa Monica beach to Downtown Los Angeles passing through several activity centers: mid-Wilshire, Miracle Mile, Museum Row and UCLA to name a few. The Wilshire Corridor attracts residents of Los Angels as well as tourists. The Exposition ROW does not have activity centers needed to attract ridership. 4

Alternative 3 would have a negative impact on schools, residents and displace businesses along the ROW. It is too costly to build, maintain and properly mitigate. There are many homes 50' from the ROW either facing it or backyards opens to it. How can you possible mitigate the negative impact the LRT would have on them? 5 6

A LRT on Sepulveda will have a negative impact on our members who will hear the bells and horn and feel the vibration. Elevating the LRT at both Sawtelle and Bundy will create an adverse visual impact. Park and Ride Lots will increase traffic at already "F" level intersections. Unattended parking lots will be a magnet for crime, which will filter into the neighborhood. 7 8 9 10

We supported a bus that remained on Venice Blvd. where there is more activity centers during the last study. If Alt. 2 remained on Sawtelle to Olympic, traveled west until it intersected with the ROW at the Santa Monica border it would have increased both the ridership and support. A bus can go off and on the ROW avoiding sensitive areas such as schools and homes. If there is a problem on the ROW a LRT is stopped until it is cleared. A bus can go around it. A rail line is fixed. A bus can be rerouted to meet public transit demands. 11

Alternative 1 has a proven ridership. Put our limited resources where the ridership is proven. 12

Thank you for your think and consideration in this matter. 13

Sincerely,

Terri Tippit

Terri Tippit, President
West of Westwood HOA

cc: US Senator Diane Feinstein
US Senator Barbara Boxer
Congresswoman Diane Watson
Congressman Henry Waxman
State Senator Shiela Kuehl
State Senate Kevin Murray
State Assemblyman Paul Koretz
State Assemblyman Herb Wesson
Supervisor Yvonne Burke
Supervisor Zev Yarolsavsky
Mayor-elect James Hahn
Concilwoman Ruth Galanter
Councilwoman Cindy Miscikowski
Councilman-elect Jack Weiss

WAC(1)

WAC
Wilshire Advocates Coalition

3600 Wilshire Blvd., Ste. 1032
Los Angeles, CA 90010
213.383.1891 phone
213.386.5853 fax
www.wilshirecenter.com

May 5, 2001

Wilshire Center Business Improvement Corp.

Wilshire Center Chamber of Commerce

Wilshire Center & Koreatown Community Advisory Committee

Miracle Mile Apartment and Commercial Owners Association

Wilshire American Coalition

Country Club Park Neighborhood Association

Wilshire-Kingsley Neighborhood Association

Miracle Mile Association

Wilshire Park Association

Miracle Mile Chamber of Commerce

Miracle Mile Civic Coalition

Miracle Mile Residential Association

Mr. David Mieger
MTA
One Gateway Plaza, Mail Stop 99-22-5
Los Angeles, CA 90012-2952

Re: Mid-City/Westside Transit Corridor
Draft EIS/EIR

Dear Mr. Mieger,

The Wilshire Advocates Coalition (WAC), a broad based coalition of established business and residential organizations between Beverly Hills and Downtown Los Angeles, was formed in 1999 in response to the Los Angeles County Metropolitan Transportation Authority's ("MTA") study of Westside Transit Alternatives and specifically a proposed "fixed guideway or dedicated busway" along Wilshire Boulevard from the City of Santa Monica to Wilshire & Western (the terminus of the Metro Rail Red Line). 1

In 1999 we participated in the MTA's Community Outreach meetings and during the year 2000 and into early 2001, we met directly with Mayor Riordan, Supervisor Yaroslavsky and Supervisor Burke as well as with MTA staff and consultants in connection with the Environmental Impact Report ("EIR") process. Our original position is and remains that we do not support the Wilshire BRT transit system as described as either fully dedicated or peak hour traffic lanes as a logical and financially viable transportation system. Since the results of the EIR have been made public, we have reviewed the findings and would like to state the following additions: 2 3

1. We prefer and support the route of Bus Rapid Transit or Light Rail Transit on Exposition Boulevard. It is our understanding that there is considerable and growing support for this route. 4

2. We believe that the current Wilshire Metro Rapid Bus system is extremely successful. Expansion of this service would be a fiscally responsible solution to our transportation needs. 5

3. The EIR does not include, but should include the reference to the Wilshire Advocates Position (September 26, 2000) or the letter from the City of Los Angeles Department of Transportation (dated June 22, 2000 - attached), nor does it include any letters from city, state and federal agencies (Beverly Hills, Santa Monica, LADOT, Federal Transit Administration - attached). 6

The Wilshire Advocates Coalition understands the need for enhanced services and increased ridership. We would like to continue to work cooperatively with the Board, the MTA staff and our elected officials to find a fiscally responsible and mutually satisfying resolution to our transportation needs for the Wilshire Boulevard community and greater Los Angeles community. 7

Gary Russell
President
Wilshire Center
Chamber of Commerce

Stephen Kramer
President
Miracle Mile
Chamber of Commerce

Andrew Militois
President
Wilshire Center
Business Improvement District

Wally Marks
President
Miracle Mile
Civic Coalition

cc/WAC Members
Attachments

IMPORTANT NOTICE TO WILSHIRE COMMUNITY BUSINESSES, RESIDENTS, ORGANIZATIONS AND INTERESTED INDIVIDUALS

The Los Angeles County Metropolitan Transportation Authority (MTA) is studying one transportation alternative for the Mid-City/Westside Transit Corridor. The MTA Board has made its final decision as to what will be the preferred route and transportation system for this Westside Transit Corridor and it is the Wilshire BRT as of February 24, 2000, a very sad day for the City of Los Angeles and the Wilshire Community.

The MTA Board is seriously considering building dedicated/exclusive bus lane system (Wilshire BRT) that will significantly impact traffic on Wilshire Boulevard, on adjacent streets, and will remove the new landscaped medians. **In MTA's own words: loss of two lanes, significant loss of left-turn lanes, loss of on-street parking, impact to North/South traffic, and impaired access to local businesses.** This they say is a good solution!

Parking will be gone--people will no longer be able to pull up in front of retail businesses and stop in. Car and local bus traffic will now be crammed into two lanes, causing back-ups all along Wilshire and adjoining streets, no left-turning off of Wilshire Blvd., and traffic backing up for blocks on the North/South direction on each side of Wilshire.

The BRT is an unimaginative and unattractive high-speed, grade-level fixed lanes down the middle of the boulevard that will endanger cars, pedestrians and the well being of our community. **The BRT is to be built along Wilshire Boulevard starting at Vermont/Wilshire and ending at San Vicente/Wilshire east of Beverly Hills.** Those of us who have invested millions of dollars and countless volunteer hours revitalizing our communities and beautifying our streets, medians and storefronts cannot stand idly by and watch the BRT destroy what we have worked so hard to build.

The Wilshire Advocates Coalition opposes the Wilshire BRT. The Coalition consists of Wilshire Center Business Improvement Corp., Wilshire Center Chamber of Commerce, Wilshire Center & Koreatown Community Advisory Committee, Korean-American Coalition, Country Club Park Neighborhood Association, Beverly-Kingsley Neighborhood Association, Park Mile Association, Miracle Mile Apartment and Commercial Owners Association, Miracle Mile Chamber of Commerce, Miracle Mile Civic Coalition, and Miracle Mile Residential Association and growing. Our two local City Councilmen, Councilman Nate Holden and Councilman John Ferraro, also, oppose the BRT. If your group opposes the BRT please email us at glra@pacbell.net.

Make your opinion known to the MTA Board, to the City Councilmen, the Mayor, the Assemblymen, the Congressmen, the Governor, the President, the candidates running for office and inform your neighbors to help protect Wilshire Boulevard's resources, vitality and history. **The people who live here and the local small businesses need your HELP. MTA is at it again.**

STOP THE WILSHIRE BRT
STOP THE WILSHIRE BRT

For more information log on to www.wilshirecenter.com.

THE WESTFORD CONDOMINIUM ASSOCIATION
10750 Wilshire Boulevard
Los Angeles, California 90024
(310) 470–3646 FAX (310) 470-3649

SCANNED IN RMC

May 25, 2001

Mr. David Mieger, Project Manager
Los Angeles County MTA, One Gateway Plaza
Mail Stop 99-2-5, Los Angeles, CA 90012

Dear Mr. Mieger,

On behalf of the app. 250 residents and employees of The Westford, we strongly oppose the proposed installation of the Wilshire Bus Rapid Transit (BRT) by the MTA. 1

The Wilshire Blvd. Corridor (between Comstock and Westwood Blvds.) is already adversely impacted by the combination of high volume, excessive speed, dangerous turn conditions, frequency of collisions, accidents, and traffic noise, without making it more convenient for these circumstances to multiply. Speeding buses in exclusive lanes will only add to the congestion woes of this heavily traveled Boulevard. 2

Our elderly can't cross the Boulevard safely now at the intersections in the time allotted! Vehicles can be observed daily passing through the red lights or cheating on the yellow light as they speed on the Boulevard. Cars exiting from the buildings on the Corridor are only managing to do so because of the jut-outs protecting them from oncoming traffic. Eliminating the center turn lanes will only further prohibit homeowners and residents from entering their buildings safely and conveniently. One can envision more accidents and fatalities as people stand indefensible on center islands from "run away" vehicles or try to "run" across Wilshire to catch a bus. 3

In the afternoon/early evening period, in the westerly direction, there are daily traffic backups from the 405 Freeway back through the Corridor because of Freeway congestion. Cars are barely moving, bumper-to-bumper, suddenly changing lanes, going into the side streets and coming out on Wilshire again, with frustrated drivers trying to gain some advantage to reach the Freeway. The amount of air and noise pollution emanating from this stagnant mass of cars and buses is horrendous. 4

Any new lanes for express buses would quickly see themselves filled up with these same frustrated drivers and their vehicles to no advantage to the proposed lanes! Policing might help in the first few days but afterwards there will be no advantage to the bus rider. These buses will just be spewing out their emissions to the high-rise residents as they idle and fight for position in this section of the Boulevard. It is a 5

dream to believe that this proposal will be a solution to population growth. The EIR is astonishingly biased and misleading in its view of the environmental and safety impact on the residents and employees of the Corridor.

The potential decrease in vehicle lanes to accommodate the bus lanes will breed a further decrease in vehicle speeds and therefore greater retention time for an increase in CO emissions as traffic moves slower on balance through the area. Your EIR is negligent in not assuming an increase in pollution in certain pockets of Wilshire Boulevard such as would occur on the Corridor. Your statistics may hold up on average for the entire length of Wilshire Boulevard, but you would certainly adversely impact the pollution circumstances on the Corridor! 6

We contend that this Wilshire Corridor is one of the highlight residential areas of Los Angeles and should not be disturbed. One obvious suggestion to improve bus schedules on the Boulevard is to move ALL the bus stops to the post-crossing position after intersections, not before intersections as many are situated now. New York City experience has seen a sharp improvement in transportation cycles by moving all bus stops to after the intersection. 7

In section 3.13, the assumption that there will be a reduction of fuel consumption is questionable when one considers the increased slowdown of vehicles idling in the Corridor because of the Freeway congestion. 8 In section 3.14, making people walk a number of blocks at night from new off-Wilshire parking locations from a side street location makes security a significant consideration as opposed to the EIR's "less than significant" conclusion. 9 Why would you want to destroy the beautiful makeup of this quiet side street community to introduce parking lots? 10

To make the Wilshire Corridor into a bus speedway (or a rail speedway) is one of the most ridiculous ideas ever proposed. The time saved by these speeding buses can only be considered minimal when one factors in the potential new hazard to the health and safety of the community. There will be insurmountable massive resistance because of the safety considerations, the noise, traffic upheaval, the impossible deliveries conditions, the inconvenience of a 24-32 month construction upset, and adverse impact on property values that your proposal risks for the community. 11

We encourage you to consider a Santa Monica Boulevard alternative "paralleling" the Corridor as being more sensible than "damaging" this outstanding residential area of the city. Thank you for your consideration. 12

Sincerely,

Westford Board of Directors

SCANNED IN RMC

Westwood Homeowners Association

% Richard D. Agay, 16661 Ventura Blvd., Penthouse, Encino, CA 91436-1914
• Telephone: (818) 986-2569 • Fax: (818) 783-9638

June 14, 2001

IN REPLY PLEASE REFER TO:
Transmit

BY FAX - (213) 922-3060

Mr. David Mieger, Project Manager
Mid-City/Westside Transit Corridor Study
One Gateway Plaza
Los Angeles, California 90012-2952

Re: Draft EIR
Mid-City/Westside Transit Corridor

Dear Mr. Mieger:

We support the concept of improved transportation in the Westside. Nonetheless, a dedicated bus lane between Beverly Hills and the San Diego Freeway is not an improvement, and we are opposed to it. We are Wilshire Corridor adjacent residents and are frightened at the prospect of even greater imprisonment through creation of bottlenecks at the westerly and easterly boundaries of Westwood through the reduction to only two lanes of automobile travel. 1

The first negative impact of the dedicated bus lane is on the flow of automobile traffic on Wilshire Boulevard from reduced lanes. The second negative impact is the rippling impact on the residential and business streets which are adjacent to Wilshire Boulevard in these areas of lane reduction. 2

The reduction at Westwood Boulevard from four lanes at present to three, and from Veteran to the 405 Freeway from three lanes to two is likely to affect seriously the traffic to and from UCLA for intersections which have already earned the title of most heavily traveled. 3

Your plans call for widening the section of Wilshire Boulevard West of Comstock Avenue to continue to provide three traffic lanes in each direction, in addition to the designated busway, while the section East of Comstock shows two traffic lanes in each direction plus the busway. Our concern is that this creates a bottleneck for Eastbound traffic at Comstock where the available number of traffic lanes will be reduced from three to two. A driver who encounters this bottleneck will be tempted to avoid the congestion by turning South on Comstock and proceeding through the single family residential area to Santa Monica Boulevard and then East to Beverly Hills. If the backup is severe, the diversion of traffic through residential areas could occur on streets significantly West of Comstock including Beverly Glen, Holmby, Westholme, etc. 4

This neighborhood is immediately adjacent to Century City and already suffers from Century City cut-through traffic, which the MTA EIR recommendations for the Santa 5

President: Richard Agay
Vice-President: Bill Wagner
Secretary: Neil Jacoby, Jr. • Treasurer: Arnold Anisgarten
Directors: Richard Agay, Arnold Anisgarten, Jan Beumer, Ben Campisi, Charles Edelsohn, Ivan Finkle, Neil Jacoby, Jr., Mike Metcalfe, Nancy Myers, Howard Singer, Jan Sobieski, Bill Wagner

Monica Transit Parkway acknowledges. Increased cut-through traffic caused by Bus Rapid Transit changes would seem to place a doubly unfair burden on this part of Westwood.

Furthermore, east-west improvement is not an advantage without improvements on north-south traffic. Improved flow on Wilshire Boulevard and on the Santa Monica Transit Parkway may act as a magnet to draw more San Fernando Valley commuter traffic on to Sepulveda Boulevard, the 405 Freeway, Roscomare Road, Beverly Glen Boulevard, Benedict Canyon Boulevard, etc. 6

The problem is especially exacerbated during the next several years while there is so much traffic between the 405 and Westwood Boulevard for dirt hauling for, and construction of, the new UCLA hospital. 7

Given that the current plan appears to benefit solely those who have long journeys or Wilshire walking distance departure and destination points that would make the busses a reasonable mode of transportation, the plan appears to have very limited potential use for Wilshire adjacent residents. Only those with a Wilshire destination would convert from car to bus. Given this likely little benefit of the bus to Wilshire adjacent residents, such as Westwood Wilshire adjacent residents, the entire, significant burden of the plan should not fall on us who must continue to use our cars. 8

By contrast, the Exposition Boulevard concept seems to have significant natural advantages. It makes use of an existing, MTA owned but unused, right-of-way which parallels the proposed Wilshire BRT. It can provide at least equal benefits to the long journey commuters that the Wilshire BRT would provide. With the diversion away from Cheviot Hills, you seem to have solved the problem for Exposition adjacent residents which seem to be unsolvable for Wilshire adjacent residents. Finally, if the Exposition Boulevard route used light rail, that would adds transit capacity without reducing already strained automobile capacity. 9

For these reasons, the Westwood Homeowner's Association opposes the Wilshire BRT and advocates the Exposition approach be it bus or light rail. 10

Yours very truly,

RICHARD D. AGAY
President,
Westwood Homeowners Association

RDA:vrm

cc: WHA Requesting Board Members

President: Richard Agay
Vice-President: Bill Wagner
Secretary: Neil Jacoby, Jr. • **Treasurer:** Arnold Anisgarten
Directors: Richard Agay, Arnold Anisgarten, Jan Beumer, Ben Campisi, Charles Edelsohn, Ivan Finkle, Neil Jacoby, Jr., Mike Metcalfe, Nancy Myers, Howard Singer, Jan Sobieski, Bill Wagner

This letter mailed because fax number did not answer.

President: Richard Agay
Vice-President: Bill Wagner
Secretary: Neil Jacoby, Jr. • **Treasurer:** Arnold Anisgarten
Directors: Richard Agay, Arnold Anisgarten, Jan Beumer, Ben Campisi, Charles Edelsohn, Ivan Finkle, Neil Jacoby, Jr., Mike Metcalfe, Nancy Myers, Howard Singer, Jan Sobieski, Bill Wagner

JUN 27 2001
SCANNED
IN RMC

WILSHIRE TERRACE

Mr. David Mieger, Project Manager
Los Angeles County MTA
One Gateway Plaza
Mail Stop 99-2-5
Los Angeles, CA 90012

June 25, 2001

Dear Mr. Mieger

The Board of Directors of Wilshire Terrace, representing 135 "Tenant Owners," have voted unanimously to oppose the Wilshire Bus Rapid Transit (BRT). 1

The "Wilshire Corridor" is a residential street on which the present buses have only a minor impact on traffic, whereas the BRT plan will cause serious congestion. Because of the age and infirmities of many of the residents the time necessary for them to get to the center of Wilshire Blvd. will be at best a traffic stopping event and at worst a major cause of personal injuries. 2

In addition to the above it is likely that the slowing of traffic caused by fewer lanes for automobiles will create many more traffic jams thereby causing increased emissions along the corridor, once again to the detriment of the primary age group. 3

For these, as well as many other reasons, related to you from individuals as well as boards of directors representing their tenants we urge a no vote on the Wilshire Bus Rapid Transit. 4

WILSHIRE TERRACE
Board of Directors

M. M. Maltz, President

10375 WILSHIRE BOULEVARD • 310-274-6901 • LOS ANGELES, CALIFORNIA 90025

WESTSIDE VILLAGE
CIVIC ASSOCIATION

Charles West, President

May 27,2001

Mr. David Mieger, Project Manager
Los Angeles County MTA
Mail Stop 99-22-5
One Gateway Plaza
Los Angeles, CA 90012

Dear Mr. Mieger:

I would like to comment in this letter on the Draft EIR/EIS issued by the MTA regarding the Mid-City/Westside Transit Corridor proposals the MTA is considering. I do so on behalf of the Board of Directors of the Westside Village Civic Association, for which I serve as President. This Civic Association draws its membership from residents of the approximately 1,100 single-family homes in the Westside Village community, which is bounded by National Boulevard on the north, Overland Avenue on the east, Charnock Road on the south , and Sepulveda Boulevard on the west. About one-half of the eligible residences are dues paying members of the Association. The opinions expressed in this letter are those of the Board, but they were strongly supported and influenced by the written comments the Board received in response to an article about this subject in our Association Newsletter, by the comments of about 50 members who attended an open meeting of the Board mostly devoted to this issue, and by the more than 300 Westside Village residents who signed a petition expressing opposition to the Venice/Sepulveda diversion. A copy of this petition with signatures is enclosed. Although not every member responded, there was overwhelming support among those who did for the positions taken in this letter.

Westside Village residents vigorously oppose the implementation of the Expo Transit components of MTA Alternative Plans #2 and #3 as they are presently proposed with the Venice/Sepulveda diversion included. Our concerns have to do with the diversion, and are focused especially on the negative impacts that the construction and operation of a rapid transit system on Sepulveda Boulevard would have on our area. It also seems to us that the inclusion of the diversion creates serious and unnecessary problems for the construction and operation of a sound Expo Light Rail system, which we strongly favor.

The 405 Freeway and Sepulveda Boulevard, which is a designated alternate route for the 405, serve together as major arteries for north/south traffic in the Westside. Rush hour traffic is frequently jammed now on Sepulveda at its major intersections with Pico, National, Palms and Venice Boulevards, all of which would be further impacted by the proposed Venice/Sepulveda diversion from the Expo route. This currently overburdened system would be further strained by the construction and operation of a rapid transit system on Sepulveda. The loss of a left turn lane at Sepulveda and National would further exacerbate the situation by forcing traffic to neighboring surface streets to accomplish the left turn. The inevitable overall consequence will be a diversion of more traffic from Sepulveda to neighboring residential streets in Westside Village and elsewhere. The level of rush hour traffic on surface streets in our residential area is already an escalating problem, which would only be worsened by the additional burden generated by the operation of a rapid transit system on Sepulveda as proposed. 3

The safety hazard for school children posed by increased traffic or residential streets in our area is also a serious concern. The major routes for diverted traffic from Sepulveda through Westside Village carry much of the traffic past Charnock Road Elementary School, Clover Avenue Elementary School and a Nursery School operating at St. John's Presbyterian Church. School officials and parents are understandably concerned about the negative impact that additional traffic would have for the safety of children, especially at the most congested periods when children are arriving at, or departing from, the schools. 4

The traffic problems caused by the diversion would not be restricted to Westside Village. Any impediment in the flow of traffic on this major north/south route would be felt more generally. Many motorists on the Westside who must commute regularly in the north/south directions already feel that the regulation of traffic flow is biased in favor of the east/west routes. The concept of using an overburdened north/south route as a part of an east/west rapid transit system seems totally illogical in present circumstances. 5

Other concerns we have relate to the changes in Sepulveda Boulevard that would be necessary to accommodate a rapid transit system. As the EIR/EIS points out, the residents and property owners on Sepulveda object strongly to the widening of Sepulveda, which would cost them about half of their parkway space. They would also lose a large number of well established trees. About 30 per cent of the parking spaces would be lost from Sepulveda , with no indication of a feasible plan for replacement. Residents fear that there will be a spill-over of parking to residential streets from both the lost spaces and new parking needs associated with the proposed Expo Light Rail stop on Sepulveda. The noise, dirt and general dislocation associated with construction are also voiced as concerns. 6

Westside Village residents are strongly in favor of a Light Rail system connecting Mid-City and Santa Monica, and have a strong preference for Light Rail rather than Bus Rapid Transit. We feel equally strongly that a Venice/Sepulveda diversion should NOT be a part of this system. Transit along the entire Exposition Right-of-Way, as originally proposed, seems a more logical route from both the financial and engineering points of view. We join others who ask the MTA to reconsider its earlier decision, and make available the MTA-owned Right-of-Way from Venice to Sepulveda for Expo Light Rail Transit. 7

Thank you for giving us the opportunity to voice our concerns. We ask you to consider them seriously and to act to address them. 8

Sincerely,

Charles A. West

Charles A. West
President, WVCA
3461 Military Avenue
Los Angeles, CA 90034
Phone: (310) 839-7320; E-mail: (west@chem.ucla.edu)

Cc: Ruth Galanter, Los Angeles City Councilwoman, Sixth District
Cindy Miscikowski, Los Angeles City Councilwoman, Eleventh District
Yvonne Braithwaite Burke, Los Angeles County Supervisor
Zev Yaroslavsky, Los Angeles County Supervisor
Friends 4 Expo Transit, Attention: Darrell Clarke