I support bus lanes on Wilshire Blvd.

Bus-only lanes will make the street safer for pedestrians and bike riders. The lanes will also make transit much better by increasing average bus speeds and especially making the bus much more reliable and on-time, during rush hour.

However, these lanes need to be expanded to the cities of Beverly Hills and Santa Monica, and all the way to Downtown LA, to make Wilshire a real BRT route. And the lanes should be in effect all day long; rush-hour-only lanes will be confusing to people looking for parking and lead to many delays for the buses, and dangerous lane-merges for bike riders.

Please expand this (real) BRT to the eastern part of the 720 route (Whittier blvd), and to Vermont, as soon as possible. Every Rapid bus should have bus-only lanes, if we are going to have a real bus rapid transit system, which will get people out of their cars and improve all our neighborhoods.
COMMENT LETTER NO. 43
Eisenberg, Joseph

Response to Comment No. 43-1

This commenter supports the proposed project; the comment has been noted and will be forwarded to the decision makers for their consideration.

Response to Comment No. 43-2

Please refer to Master Response No. 17 regarding the non-participation of the Cities of Beverly Hills and Santa Monica.

Response to Comment No. 43-3

The comment has been noted and will be forwarded to the decision makers for their consideration.
Comment from

First Name: Joyanna
Last Name: Eisenberg
Email: j.n.eisenberg@gmail.com
Phone: 562-221-5437
URL: 

Please build the bus lanes on Wilshire!

I have commuted from Long Beach to UCLA by transit, but usually drove myself on the 405, because the bus on Wilshire is slow and especially unreliable. But I hate driving in traffic, and would much rather take transit, if it were as fast and reliable as the Blue Line and Purple Line. Until the subway gets built, bus lanes and real “BRT” on Wilshire could make a big difference, enough to get me riding Metro to work. Even after the subway, bus lanes will be needed for all people going to places that are not near a subway stop, especially in Mid-City and west of La Cienega, where the stations are often far apart.

Please build these bus lanes, and then continue them along the whole of Wilshire, as soon as possible.

-----------------------------------------------
COMMENT LETTER NO. 44
Eisenberg, Joyanna

Response to Comment No. 44-1

This commenter supports the proposed project; the comment has been noted and will be forwarded to the decision makers for their consideration.
From: feedback@metro.net
Sent: Tuesday, July 20, 2010 9:25 AM
To: WilshireBRT
Subject: [Metro.net] customer comment

Comment from

First Name: Joel
Last Name: Epstein
Email: joel.epstein@gmail.com
Phone: 310-472-1103
URL: 

Full steam ahead. Build it as fast and possible with a dedicated lane that cars and trucks CAN'T get into. Work out the kinks in Beverly Hills and Santa Monica too so it's a true BRT.

Put cameras on the front of the buses to automatically catch and ticket cars and trucks using the BRT lane.

Until the subway to the sea is completed the Wilshire BRT is out best alternative. Thanks for your consideration.

--------------------------------------------------------------------------------
COMMENT LETTER NO. 45
Epstein, Joel

Response to Comment No. 45-1

This commenter supports the proposed project; the comment has been noted and will be forwarded to the decision makers for their consideration.

Please refer to Master Response No. 17 regarding the non-participation of the Cities of Beverly Hills and Santa Monica.
I support the findings of the draft EIR.

I urge MTA and LA City Council to adopt the "Alternative A" proposal with one minor amendment. Amend the proposal to include Valencia to Parkview St. segments in the project where the Westlake/Alvarado community resides.

I support the expedient implementation of the Wilshire Bus-Only Lanes Project.
COMMENT LETTER NO. 46
Espiritu, Evyn

Response to Comment No. 46-1

This commenter supports the proposed project and urges adoption of Alternative A with the inclusion of the segment between Valencia Street and Park View Street; the comment has been noted and will be forwarded to the decision makers for their consideration.

Please refer to Master Response No. 7 regarding the request to include the segment between Valencia Street and Park View Street in Alternative A.
Mat,
These are excellent points that point not only to inconveniences for the passengers but to obstacles to smooth and speedy operation of the bus line.
David Ewing

On Jul 17, 2010, at 12:30 AM, Hetz Matthew wrote:

I support the development of bus only lanes for Rapid Buses on Wilshire Boulevard. I spoke at the Metro/LADOT meeting, June 30, at the Felicia Mahood Center, West Los Angeles on the subject, and wish to add my comments in writing

The creation of the bus only lanes is only a partial aspect of improving bus travel, particularly with the articulated buses in use by Metro. I have been a consistent bus rider since 1992, and ride rapid buses on Wilshire Blvd, and the 704 on Santa Monica Blvd., and the 751 through Westwood Village to the Getty Center.

If this project only focuses on the creation on the Rapid Bus lanes, and does not make improvements at the Rapid Bus stops, then it will be a failure and will not attract new riders.

One problem with the articulated buses is that the front door swings outward and then glides along the outside of the bus. At many Rapid Bus stops this is a problem due to high curbs. The streets of Los Angeles carry not only vehicles, but when it rains, they act as creeks and rivers to quickly move the water off the streets into the storm drains. To direct the rain water, the curbs are high, otherwise the water would rise up onto the sidewalks and onto property.

If the articulated buses stop too close to the high curbs, then the front door hits the curb and cannot open. Sometimes the door is wedged, and the bus cannot move. To make sure the door opens, the Rapid Buses then stop at a distance from the curb. This makes for a clumsy and difficult boarding and disembarking. The rider must step off the sidewalk into the street, and then into the high bus, and vice versa when departing.

There was no forethought in planning when these articulated buses began service, and that makes it very difficult for bus riders, particularly senior citizens; people with walking problems; women carrying a baby and stroller or pulling an infant along; or people carrying rolling attaches. If it is raining, the bus rider must step into the wet street, sometimes in deep water, to get into and out of the bus. This is not acceptable, and this problem with the front door must be addressed in this project.

Another major problem are the back doors of the articulated buses which many times open onto obstacles or a driveway cut-outs in the curbs which make for a very steep step down when disembarking.

Below are photos I've taken of the Wilshire Rapid Bus, Nos. 1 and 2, and the Santa Monica Rapid Bus, the remaining photos.
The Wilshire Rapid Bus photos, 1 & 2, are the stop at Westwood Blvd. This stop is on the west side of the intersection. When the back door opens there are a concrete trash can and tree, with a hole around it, in the way. This is not only awkward, it is a hazard, and it is without excuse. How could a transit system and city transportation department in one of the major cities of the world allow this to happen?

I've called Metro and LADOT about this stop, and nothing has changed.

Bus riders are instructed on the the articulated buses to depart via the back doors, so this is not a secret that passengers must depart this way. But it is obvious that no thought was given to the doors on the articulated buses, and indeed, thought must be given on on the processes involved with passengers getting onto and off any and all buses.

The other photos are from the Santa Monica Blvd. Rapid Bus. They show that the back door exit is at a driveway cut-out. This makes for a very steep step, which it can be hazardous. Moreover, if it is raining, the departing bus rider is forced to step into the gutter carrying water. This is an insult to bus riders, and wrong since this can be avoided by planning.

Since I'm informing you of these situations, Metro and LADOT must carefully study and plan each and every Rapid Bus stop in this project to avoid these hazardous situations, and situations which make riding the bus in Los Angeles a journey more difficult than it needs to be.

If the new Rapid Bus lanes are to be successful, then careful planning must be made for each and every Rapid Bus stop to avoid there poorly planned and horribly executed bus stops.

Matthew Hetz
Los Angeles
Member, Los Angeles Council District 11 Transportation Commission

<Rapid 720 stop, Wilshire Blvd at Westwood.JPG>

<Rapid 720 stop, Wilshire Blvd at Westwood.JPG>

<Santa Monica and Barrington stepping onto the driveway cut-out. If it was raining, it would be full of water.JPG>

<Santa Monica and Bundy
Notice how much of the woman's leg is cut off in photo, indicating the steepness of the step.JPG>

<Santa Monica and 26th.JPG>

=S
COMMENT LETTER NO. 47
Ewing, David

Response to Comment No. 47-1
Comment noted; please refer to the responses below.

Response to Comment No. 47-2
This commenter supports the proposed project; the comments regarding improvements at the BRT stops have been noted.

Response to Comment No. 47-3
The suggestions regarding bus specifications and bus loading and unloading features have been noted. LACMTA is aware of the problem with the front door getting hung up at curbs that are 9 inches or higher. To address this problem, operators must pull into those bus zones at least 18 inches away from the curb. LACMTA understands that this is not an ideal situation and apologizes for any inconvenience. LACMTA also makes every effort to establish stops where both doors open onto solid curb. Unfortunately, this is impossible to do in every case.
July 24, 2010

LACMTA
One Gateway Plaza, Mail Stop 99-23-1
Los Angeles, Cal.  90012 Attn:  Martha Butler, Project Manager

Re:  Wilshire Bus Transit Project DEIR Questions/Comments

Dear Ms. Butler,

On July 20, 2010, you appeared before the Westwood Community Council to give an overview of the proposed Wilshire Bus Rapid Transit Project (BRT). During the presentation, the following questions were asked by board members and members of the audience. You requested that those questions/comments be transmitted to you for responses in the FEIR. They are included below. Thank you for the efforts to answer them as fully as professionally possible. Also, thank you for the time your presentation time before this group.

1.  In 2001, a Westwood area study was completed regarding transit time of buses, which included several other bus companies. The conclusion was that the transit time was good. What has transpired within the intervening years (2001-2010) that led to the conclusion that rapid transit bus lanes are needed within the Westwood Area? What has changed? If transit time is still acceptable, why is this project being proposed for the Westwood area?

2.  It is proposed that the Red Line Subway Line will run under Wilshire Blvd. with a stop in Westwood. It is now being proposed to have this line operational within the Westwood area in 2020 so that it will take 26 minutes to travel from Westwood to Downtown L.A. How will this affect the proposed BRT project? Won't this proposed subway extension render the BRT obsolete? If not, please explain. How will the two lines interact and affect one another?
3. A test run rapid transit line study was completed two years ago that included the segment from Veteran to Centinela. Onstreet parking was severely constricted and affected business viability. The remaining time of the test project was pulled? How would the affects from this project affect the proposed BRT project?

4. Since Beverly Hills has opted out of the proposed BRT project, how will the travel time be affected once the buses enter into the Beverly Hills city limits? Experience has shown that the travel time is severely reduced once entering this city. Will there be more congestion, due to this proposed project, in Beverly Hills? Please analyze the time affects onto this proposed project?

5. Have you analyzed the amount of cut through traffic from Wilshire Blvd., onto Westwood residential streets, specifically, Lindbrook Avenue and Ashton Avenue due to the resulting two lanes of traffic flow in each direction? If not, please do so. What are the effects on other residential streets?

6. What are the plans, if any, to replace mature sidewalk trees along the Westwood portion of the project?

7. It is expected that this project will add substantially more people onto buses along Wilshire Boulevard. What is being planned to run additional/improved connecting north/south bus lines along streets crossing Wilshire Blvd., so that people can truly utilize an improved bus system for commuter ease?

8. How does the improved rapid bus line along Santa Monic Blvd. in Westwood affect the proposed BRT project along Wilshire Blvd.?

9. How can the safety of bicyclists be assured if the bicycle lane is adjacent to the proposed BRT lane? What means will be taken to do so? Currently, local and express buses traverse Wilshire Blvd. in excess of 45 mph. No joke. These speeds do not lend to a safe situation.

10. What other studies, other than New York City (which is not comparable to Los Angeles, since there is an existing extensive subway system), have been looked at to help define and result with excellent ridership and excellent vehicular transit? What are the results? How do they help to define expected results from this proposed project?

11. What is the timing segment for buses from Selby-Comstock in both directions now? What is the timing expected along the same segment for the proposed project? Further, is there time saved for other vehicles that must travel in the remaining two lanes (each direction during rush hours) that would not create a huge bottleneck or add time to such travel? Please analyze.

Sincerely,

Jackie Freedman for the Westwood Community Council Members
COMMENT LETTER NO. 48
Freedman, Jackie
Westwood Community Council

Response to Comment No. 48-1

Comment noted.

Response to Comment No. 48-2

The 2002 study was done using a Base Year of 1998 and SCAG’s RTP 1997 based projections for future growth. Our current study was performed using a Base Year of 2008 and RTP 2008 projections for future growth. While the projections for growth in the region are done as accurately as possible, over time different visions of the future of the region emerge, and slightly different future year development patterns are projected. Each study must be done using the best estimate of what the future would be, but over time the futures projected would likely be slightly different. This would result in differences in the details of project impacts, but the general trends would remain. Another difference could arise if the future networks have different assumptions of what would exist in the future. The new study included such projects as the Expo Light Rail Transit Line and the HOV I-405 Project.

Response to Comment No. 48-3

It will be several years before the Metro Purple Line Subway servicing the Westwood area is completed. Even after completion, bus service on Wilshire Boulevard would remain to serve those riders who choose not to take rail and to carry rail riders from rail stations to their origins/destinations along the Wilshire corridor.

Response to Comment No. 48-4

Please refer to Master Response No. 4 regarding the differences between the proposed project and the Bus Lane Demonstration Project.

Response to Comment No. 48-5

Please refer to Master Response No. 17 regarding the non-participation of the Cities of Beverly Hills and Santa Monica.

Response to Comment No. 48-6

Please refer to Master Response No. 13 regarding cut-through traffic in adjacent residential areas.

Response to Comment No. 48-7

Please refer to Master Response No. 11 regarding removal of street trees.
Response to Comment No. 48-8

There are currently no plans to run additional and/or improved connecting north/south bus lines along streets crossing Wilshire Boulevard at this time; however, should ridership increase along these corridors as a result of the Wilshire BRT Project, service levels would be adjusted accordingly.

Response to Comment No. 48-9

The Santa Monica Metro Rapid Line in Westwood would have no affect on the proposed Wilshire BRT project.

Response to Comment No. 48-10

Safety is first at LACMTA. Metro Rapid bus operators will be made aware of the potential for bicycles to be operating in the bus lanes at any given time. Special training and information will be provided to the operators prior to opening the bus lanes. Bicycles, by law, are allowed to operate in the bus lanes.

Response to Comment No. 48-11

In a study conducted for the U.S. Department of Transportation, Federal Transit Administration, Office of Research, Demonstration and Innovation, by CALSTART in 2005, it was found that from Los Angeles to Boston, communities across the country are implementing Bus Rapid Transit (BRT) systems and dispelling the perception that buses are an inferior way to travel. Some U.S. cities that have implemented bus lanes include San Francisco, Orlando, Salt Lake City, Cleveland, and Boston. Bus lanes are a key attribute of Bus Rapid Transit. Bus lanes make transit usage more attractive by reducing transit travel times, increasing service reliability, and improving safety.

Response to Comment No. 48-12

It can take buses on the Metro Rapid Line 720 approximately 3 to 4 minutes in the a.m. peak and 3 to 5 minutes in the pm peak to travel between Selby Avenue and Comstock Avenue. A one-way time savings of up to 1.5 minutes is expected in bus travel time for this segment. All of these cumulative savings would result in significantly improved passenger travel times and service reliability along Wilshire Boulevard. The bus lanes will also benefit local line 20 as well, which operates approximately 29% slower then Metro Rapid during peak hours.
To whom it may concern, I would like to voice my concern over the plan to eliminate 2 car lanes and dedicate them to busses.

I believe that public transportation is very important, but Wilshire is already like a freeway. Eliminating 2 lanes will send the more cars into the existing lanes.

It will also endanger the community who currently use the schools, rest homes, churches and synagogues in that area. There is a lot of pedestrian traffic crossing Wilshire that will also be impacted by the proposed change.

I have witnessed the city busses with limited stops speeding through intersections. They are already very dangerous.

I vote no on eliminating the two car lanes and dedicating them to busses during rush hour.

Sincerely, Marolyn Freedman
1286 Woodruff Ave
Los Angeles, CA 90024
COMMENT LETTER NO. 49
Freedman, Marolyn

Response to Comment No. 49-1

The commenter is correct that the conversion of the curb lanes to bus lanes would result in more vehicles using the remaining lanes. The Draft EIR/EA and TIA identify intersections that would be significantly impacted by the proposed project’s reduction in travel lanes and that cannot be mitigated.

Please refer to Master Response No. 12 regarding the bus speeds between Comstock Avenue and Westwood Avenue and Master Response No. 14 regarding pedestrian safety.
Dear Sir or Madam,

as a transit supporter, and a frequent rider, I would strongly suggest to consider placing Electric Trolleybuses for the Wilshire BRT.

Electric trolleybuses have been very successful all over the world, including American cities like San Francisco and Seattle.

Wilshire Blvd is a purely urban corridor, with heavy passenger demand, and the urban appearance of the corridor almost requires the addition of electric trolleybuses!

The trolleybus vehicles are entirely pollution-free, draw more ridership overall (thanks do a smoother ride, with faster acceleration and deceleration), and the overhead wiring creates a sense of permanent mass transit presence on the street, which draws more patrons, especially discretionary drivers.

More importantly, the trolleybuses will bring Los Angeles public transportation to a whole new level, ultimately gaining much wider support and generating higher ridership!

Our regular Buses (even the 60-foot NABI), on the other hand, are becoming outdated, and have never been too attractive to riders, especially when comparing to transit systems' vehicles around the world; I think it is perfect time for MTA to consider implementing Electric Trolleybuses. As MTA knows, discretionary transit usage around Los Angeles has been quite low, and traditional, outdated vehicles are one of the reasons. Trolleybus implementation has proven to attract more people, who become regular MTA patrons.

Thank you kindly for your consideration.
I am looking forward to seeing electric trolleybuses on the streets of Los Angeles!

Yours truly,
Alexander Friedman
(323) 465-8511
1330 N. Orange Dr., Apt 106
Hollywood, CA  90028-7532

P.S. Below please see a rendering of a local MTA trolleybus in Los Angeles, as well as real trolleybuses used all over the world; those would look truly great on our city streets.

Rendering of a Los Angeles MTA trolleybus:
San Francisco Muni trolleybus:

Trolleybuses used in other countries:
A double-articulated trolleybus:
COMMENT LETTER NO. 50
Friedman, Alexander

Response to Comment No. 50-1

Comment noted. LACMTA is not considering a streetcar project on Wilshire Boulevard at this time. As this comment does not state a concern or a question regarding the adequacy of the analysis in the Draft EIR/EA, no further response is warranted. However, the comment will be forwarded to the decision makers for their review and consideration.
COMMENT LETTER NO. 51  
Friedman, Alexander

Response to Comment No. 51-1

Comment noted. LACMTA is not considering a streetcar project on Wilshire Boulevard at this time. As this comment does not state a concern or a question regarding the adequacy of the analysis in the Draft EIR/EA, no further response is warranted. However, the comment will be forwarded to the decision makers for their review and consideration.
Dear Sir or Madam,
as a transit supporter, and a Metro patron, I would strongly suggest to consider placing Electric Trolleybuses for the Wilshire BRT.

Electric trolleybuses have been very successful all over the world, including American cities like San Francisco and Seattle. Likewise, Wilshire Blvd is a purely urban corridor, with heavy passenger demand, and the urban appearance of the corridor almost requires the addition of electric trolleybuses!

The trolleybus vehicles are entirely pollution-free, draw more ridership overall (thanks do a smoother ride, with faster acceleration and deceleration), and the overhead wiring creates a sense of permanent mass transit presence on the street, which draws more patrons, especially discretionary drivers.

More importantly, the trolleybuses will bring Los Angeles public transportation to a whole new level, ultimately gaining much wider support and generating higher ridership! Personally, I nowadays use public transportation only occasionally (due to reduced service and overall inefficiency, sorry to say), but - implementing Trolleybuses will attract me as your patron much more than the buses, and I will use Metro more frequently.

Our regular Buses (even the 60-foot NABI), on the other hand, are becoming outdated, and have never been too attractive to riders, especially when comparing to transit systems' vehicles around the world; I think it is perfect time for MTA to consider implementing Electric Trolleybuses. As MTA knows, discretionary transit usage around Los Angeles has been quite low, and traditional, outdated vehicles are one of the reasons.

Trolleybus implementation has proven to attract more people, who become regular MTA patrons. Thank you kindly for your consideration.
I am looking forward to seeing electric trolleybuses on the streets of Los Angeles.
COMMENT LETTER NO. 52
Friedman, Alexander

Response to Comment No. 52-1

Comment noted. LACMTA is not considering a streetcar project on Wilshire Boulevard at this time. As this comment does not state a concern or a question regarding the adequacy of the analysis in the Draft EIR/EA, no further response is warranted. However, the comment will be forwarded to the decision makers for their review and consideration.
July 20, 2010

Martha Butler  
Metropolitan Transit Authority  
1 Gateway Plaza, MS 99-23-1 
Los Angeles, CA 90012  

RE: WILSHIRE B.R.T. PROJECT  

Dear Ms. Butler / to whom it may concern:

As a transit supporter, and a frequent rider, I strongly recommend MTA to consider placing Electric Trolleybuses for the Wilshire BRT.

Electric trolleybuses have been very successful all over the world, including American cities like San Francisco, Seattle, and others. Wilshire Blvd is a dense urban corridor, with heavy transit demand, thus trolleybuses would be very suitable for the street. Pollution-free vehicles, smooth ride with faster acceleration and deceleration, lower operating costs – are some of the many trolleybuses’ benefits; and overhead wiring effectively delivers the message of permanent mass transit presence, attracting more riders. Fixed guideway, which trolleybuses generate, also triggers potential large-scale developments, which, no doubt, helps our economy and prosperity of our city!

Our traditional Buses (even the 60-foot NABI’s), on the other hand, are becoming outdated, and have never been too attractive to riders, especially when comparing to transit systems' vehicles around the world. But trolleybuses will bring Los Angeles’ public transportation to a whole new level, ultimately gaining wider support and generating higher ridership; and Wilshire BRT is a great start! Attached please find a few renderings of Los Angeles trolleybuses, as well as examples of San Francisco Muni vehicles. I believe, Škoda trolleybuses would be the best option for Los Angeles streets.

Finally, as I am aware, in 1992 LA Transit Commission and RTD were planning to build a trolleybus network, but the project got suspended due to public opposition and other senseless reasons. However, since 1990’s our city situation has obviously changed: traffic congestion, population rise, higher gas prices, air pollution – all of these factors have increased overall support of mass transit. Therefore, trolleybus projects should not face opposition as they did in the past. Now is the time to create reliable and innovative transit solutions for Los Angeles, and to upgrade to a trolleybus system!

Thank you kindly for your consideration. I am looking forward to seeing electric trolleybuses on Wilshire Blvd, and other corridors, as well!

Yours truly,

Alexander Friedman

ATTACHMENTS
Poodering at a NAATI 6046 Tracegus

# 720 on a Walkera Bus.
Rendering of a proposed "Metro Local" Trolleybus
(graphic design by Alexander Friedman)

Rendering of a proposed Culver City Trolleybus
(graphic design by Alexander Friedman)
San Francisco's Muni Škoda trolleybus

*would be perfectly suitable for Los Angeles streets, e.g. 3rd Street, La Brea Ave., etc.

San Francisco's Muni Škoda trolleybus

*would be perfectly suitable for Los Angeles

San Francisco's Muni Articulated Škoda trolleybus

*would be very beneficial for high-capacity Los Angeles bus lines, e.g. Wilshire Blvd., etc.
COMMENT LETTER NO. 53
Friedman, Alexander

Response to Comment No. 53-1

Comment noted. LACMTA is not considering a streetcar project on Wilshire Boulevard at this time. As this comment does not state a concern or a question regarding the adequacy of the analysis in the Draft EIR/EA, no further response is warranted. However, the comment will be forwarded to the decision makers for their review and consideration.
I do not support the Wilshire Bus Rapid Transit Project. I support the NO PROJECT alternative for the reasons listed in today's e-mail.

Thank you
COMMENT LETTER NO. 54
Goldman, Eleanor

Response to Comment No. 54-1

This commenter opposes the proposed project; the comment has been noted. As this comment does not state a concern or a question regarding the adequacy of the analysis in the Draft EIR, no further response is warranted. However, the comment will be forwarded to the decision makers for their review and consideration.
June 24, 2010

Ms. Martha Butler
Project Manager
Metro
One Gateway Plaza MS 99-23-1
Los Angeles, CA. 90012
Re: Wilshire Bus Rapid Transit Project
Draft Environmental Impact Report

Dear Ms. Butler:

The Draft Environmental Impact Report (EIR) is legally inadequate under the California Environmental Quality Act (CEQA). We will be sending a more detailed letter on the EIR. For the purposes of Tuesday night’s meeting, the key inadequacies include:

Aesthetics
The Aesthetics chapter discusses the removal of jut-outs and up to 40 Magnolia trees along the Wilshire Corridor (Comstock to Malcolm). The document states that the relocating of these trees would help maintain the existing aesthetic quality of the corridor. This is an erroneous finding, now based on any substantial evidence. There are no photos to support this finding.

The jut-outs contain much of the only landscaping along this wholly residential corridor. Removal of the jut-outs, the grass, and the trees is a significant impact that cannot be mitigated by relocation of trees.

In addition, the proposed bus lane will be approximately 28.5 feet from the front walls of our homes. Today, the buses travel on all of the Wilshire Boulevard lanes. With the dedicated lane, all of the buses will be passing right before our windows. This is a negative visual impact that was not analyzed in the EIR.
Greenhouse Gas Analysis

The greenhouse gas (GHG) analysis is legally inadequate under CEQA. The threshold is not supported by substantial evidence. No quantitative analysis was completed. The chapter states that there is no CEQA guidance for developing thresholds or analysis. This is demonstrably untrue. CEQA GHG Guidelines were adopted in December 2009 and became effective in March 2010.

Air Quality

There are sensitive receptors all along the Wilshire Corridor, including a retirement home and childcare center. These are not shown on any map. A dedicated peak hour dedicated bus lane will result in traffic congestion along the corridor in the non-dedicated lanes. This congestion will result in greater emissions and health impacts on the sensitive receptors, particularly at Wilshire and Warner. This is not analyzed.

Traffic

Currently, there is no congestion along the Wilshire Corridor (Comstock to Malcolm) during peak hours. Taking away a lane and making it a dedicated bus lanes, the other lanes will be congested. This impact was not analyzed.

Merrill Goldman, MA, CCAM
General Manager

On Behalf of the Board of Directors,
The Grand Homeowners Association
10445 Wilshire Boulevard
Los Angeles, CA. 90024
310-470-9045 – office
310-475-9242 – fax
Thegrandhoa@aol.com - email
COMMENT LETTER NO. 55
Goldman, Merrill

Response to Comment No. 55-1

Comment noted; please refer to Response to Comment Nos. 55-2 through 55-6 below.

Response to Comment No. 55-2

Please refer to Master Response No. 11 regarding removal of street trees.

Response to Comment No. 55-3

In consideration of comments received during the public review of the Draft EIR/EA, LACMTA and LADOT are considering Alternative A (Truncated Project Without Jut-Out Removal) as the preferred alternative. Accordingly, LACMTA and LADOT staff are recommending adoption of this alternative to the LACMTA Board, the Los Angeles City Council, and the Los Angeles County Board of Supervisors. This alternative would result in the retention of the jut-outs to maintain the buffer between the active lanes of Wilshire Boulevard and the front walls of the residences between Comstock Avenue and Malcolm Avenue.

Response to Comment No. 55-4

The commenter’s assertions that the GHG analysis is legally inadequate under CEQA on the basis that (1) thresholds are not supported by substantial evidence, and (2) the chapter states that there is no CEQA guidance for developing thresholds or analysis, are incorrect. The GHG emissions thresholds identified at the top of page 4.2-16 in the Draft EIR/EA, which read “generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment,” and “conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases,” are identical to the GHG emissions thresholds added as part of the CEQA Guideline revisions adopted in December 2009 that became effective in March 2010 (as identified by the commenter). A quantitative analysis was completed, and the results were presented in Table 4.2-8 (Estimate of Project-Related Greenhouse Gas Emissions) on page 4.2-30 in the Draft EIR/EA.

Response to Comment No. 55-5

As detailed starting on page 4.2-22 of the Draft EIR/EA under “Operational Impacts,” air pollutant concentrations are highest at congested intersection locations, and pollutant concentrations decrease as the distance from the emissions source (i.e., congested intersection) increases. For purposes of providing a conservative worst-case impact analysis, mobile-source air quality impacts were evaluated at the most congested intersection locations as identified by the traffic impact study and discussed in Section 4.1 (Traffic, Circulation, and Parking) in the Draft EIR/EA. As demonstrated in
Table 4.2-6 and Table 4.2-7 in the Draft EIR/EA, potential impacts would be less than significant at areas immediately adjacent to congested intersections. As such, impacts would also be less-than-significant at more distant sensitive receptor locations, such as those locations identified by the commenter.

**Response to Comment No. 55-6**

Section 4.1 of the Draft EIR/EA and TIA identify intersections that would be significantly impacted by implementation of the proposed project and that cannot be mitigated.
Dear L.A. County MTA:

My husband and I strongly support bus ridership, and our 17-year-old daughter rides the bus every day. However, we do NOT support dedicated bus lanes from Comstock Avenue to Glendon Avenue because we believe that reducing the number of car lanes will increase backups across west Los Angeles during rush hour and make it very difficult to access Wilshire Boulevard from our neighborhood. Also: Buses travel at high speeds in this stretch right now. A dedicated bus lane would allow for greater speeds endangering cyclists and pedestrians who cross Wilshire to go to Holmby Park, synagogues and churches.

We favor NO PROJECT for Wilshire BRT from Comstock Ave. to Glendon.

Sincerely,
Susan Gordon and Ted Schachter
10264 Rochester Avenue
Los Angeles CA 90024
sgordonnow@gmail.com
COMMENT LETTER NO. 56
Gordon, Susan

Response to Comment No. 56-1

This commenter opposes the proposed project; the comment has been noted. As this comment does not state a concern or a question regarding the adequacy of the analysis in the Draft EIR, no further response is warranted. However, the comment will be forwarded to the decision makers for their review and consideration.

Please refer to Master Response No. 12 regarding the bus speeds between Comstock Avenue and Westwood Avenue and Master Response No. 14 regarding pedestrian safety.
From: Grein, George  
Sent: Wednesday, July 14, 2010 3:44 PM  
To: Butler, Martha  
Subject: Assessment of Wilshire Bus Rapid Transit

Martha,

Metro sent a request to Sheriff Baca requesting feedback on issues that the Sheriff’s Department may have regarding the proposed Wilshire Bus Rapid Transit (BRT) Project. At the request of Commander Daniel Finkelstein, I am responding regarding the position of LASD’s Transit Services Bureau.

It has been our experience when similar service improvements were made along the Wilshire corridor (2003/2004) that initially it can be anticipated there will be issues with non-compliance by some members of the public. In addition to those who will park at the curb, despite signage prohibiting parking, we can expect issues from vehicles making right turns that may interfere with safe bus movement in the curb lane.

It is the position of Transit Services Bureau that this is a temporary issue that can be addressed through an increased enforcement effort (3-6 months). We can assess the success of our efforts at the end of three months and decide in conjunction with Metro if the additional three months are desirable. As necessary, we can always return to address problem areas as reported by Metro bus operators.

For the initial enforcement effort, it is recommended that one additional on-duty motorcycle deputy be assigned strictly to the Wilshire corridor during the morning hours and one additional motorcycle deputy be assigned during the afternoon and early evening hours, Monday through Friday. This can most reasonably be accomplished by the use of overtime, as this should be a temporary issue. The cost for enforcement by the two deputies would be:

- $1097.00 / day  
- $21942.00 / month  
- $65,856.00 / 3 months  
- This cost will be offset by some return to Metro from the issuance of citations

Previous enhanced enforcement along the Wilshire corridor was extremely helpful to bus operators. We believe that dedicating the two motorcycle deputies specifically to this effort not only make the BRT successful but more importantly make the BRT safer for bus operators and the public.

Please do not hesitate to contact me if you require additional information.

George

Lt. George Grein (Ret.)  
Law Enforcement Liaison  
Los Angeles County Sheriff’s Department  
Transit Services Bureau  
(213) 922-3687 (Office)  
(213) 219-6327 (Mobile)  
(323) 415-3362 (Fax)  
greing@metro.net  
greing@lasd.org

Pulmn qui meruit ferat
COMMENT LETTER NO. 57
Grein, George, Law Enforcement Liaison
Los Angeles County Sheriff’s Department

Response to Comment No. 57-1

During the first two weeks of the 2003-2004 Wilshire BRT Demonstration project, LADOT employed seven City of Los Angeles traffic officers, during the a.m. peak-period and seven traffic officers during the p.m. peak-period to monitor and enforce parking compliance along the project’s corridors. During the same period, no other law enforcement personnel were specifically assigned to the project. Enforcement along the project corridors by the LAPD was performed as part of routine law enforcement duties. The number of designated traffic officers were later gradually reduced to zero beginning the fifth week of the project startup. During the demonstration period, LADOT traffic officers issued 746 parking citations to parking violators, and 249 additional citations that were accompanied with the impounding of the violators’ vehicles. During the same period, LAPD issued 231 moving violations, 55 parking violations and impounded 2 vehicles. Therefore, it is clear that aggressive and sustained parking and moving enforcement along the project route would optimize the efficiency of the bus lanes. Therefore, the proposal to assign specific on-duty motorcycle officers to patrol the bus lanes will be considered.
Comment from

First Name: avi
Last Name: hakim
Email: avi@wilshiremanagement.com
Phone: 323-655-1212
URL: 

I strongly disagree with placing any exclusive bus lanes even if its for designated times during the day.
I have lived in Los Angeles for over 40 years, i drive a significant amount of time along the wilshire boulevard from santa monica to downtown.
i remember the back up in traffic that was caused by having a bus only lane in brentwood, i saw the many accidents that almost happened as a result of driver's frustrations due to the increased traffic jams. I am convinced that this will not benefit the community or traffic congestions at all.
COMMENT LETTER NO. 58
Hakim, Avi

Response to Comment No. 58-1

This commenter opposes the proposed project; the comment has been noted. As this comment does not state a concern or a question regarding the adequacy of the analysis in the Draft EIR, no further response is warranted. However, the comment will be forwarded to the decision makers for their review and consideration.
From: feedback@metro.net
Sent: Friday, July 16, 2010 10:05 AM
To: WilshireBRT
Subject: [Metro.net] customer comment

Comment from

First Name: John
Last Name: Hall
Email: jwhall@dslextreme.com
Phone:
URL:

Wilshire Bus-Only Lanes Project:

I support the findings of the draft EIR. This is another step in the right direction. If only the city of Beverly Hills could participate.

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COMMENT LETTER NO. 59
Hall, John

Response to Comment No. 59-1

This commenter supports the proposed project; the comment has been noted and will be forwarded to the decision makers for their consideration.

Please refer to Master Response No. 17 regarding the non-participation of the Cities of Beverly Hills and Santa Monica.
From: feedback@metro.net
Sent: Tuesday, July 20, 2010 3:36 PM
To: WilshireBRT
Subject: [Metro.net] customer comment

Comment from

First Name: Alia
Last Name: Hamilton
Email: alia.hamilton@yahoo.com
Phone: 
URL: 

I think it's a great Idea! It's about time and way over due. Is there any way that we can let our out of town visitor's know that Beverly Hills didn't want to be included in the (BRT) project, therefore letting our visitor’s think twice about spending there hard earn money in a city that feels they are above everybody else?

Thanks for listening.

(BRT) Project.
COMMENT LETTER NO. 60
Hamilton, Alia

Response to Comment No. 60-1

This commenter supports the proposed project; the comment has been noted and will be forwarded to the decision makers for their consideration.

Please refer to Master Response No. 17 regarding the non-participation of the Cities of Beverly Hills and Santa Monica.
When the fast lanes of the Santa Monica Freeway were turned by fiat under the administration of Governor Jerry Brown into Diamond Lanes. Chaos ensued. Gridlock became so intense that the Diamond Lanes eventually were removed, and traffic went back to normal.

Do we have any evidence that the vehicles eliminated by the express bus lanes from travelling on Wilshire won't move to other east west boulevards and cause traffic chaos on those roads? Richard S Harmetz, 2065 Kerwood Avenue, Los Angeles, CA 90025-6006
COMMENT LETTER NO. 61
Harmetz, Richard

Response to Comment No. 61-1

With the implementation of bus lanes along a significant length of Wilshire Boulevard, LACMTA and LADOT anticipate that people would change their travel patterns and divert onto other streets. Accordingly, these changes in travel patterns and diversions onto other streets were accounted for in the traffic impact analysis. Consequently, many of the intersections noted as impacted in the Draft EIR/EA are on several streets other than just Wilshire Boulevard.
From: feedback@metro.net
Sent: Monday, July 19, 2010 10:25 AM
To: WilshireBRT
Subject: [Metro.net] customer comment

Comment from

First Name: Katidia
Last Name: Haro
Email: katidia@gmail.com
Phone: 
URL: 

1. I support the findings of the draft EIR.
2. I urge MTA and LA City Council to adopt the "Alternative A" proposal with one minor amendment. Amend the proposal to include Valencia to Parkview St. segments in the project where the Westlake/Alvarado community resides.
3. I support the expedient implementation of the Wilshire Bus-Only Lanes Project.

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COMMENT LETTER NO. 62
Haro, Katidia

Response to Comment No. 62-1

This commenter supports the proposed project and urges adoption of Alternative A with the inclusion of the segment between Valencia Street and Park View Street; the comment has been noted and will be forwarded to the decision makers for their consideration.

Please refer to Master Response No. 7 regarding the request to include the segment between Valencia Street and Park View Street in Alternative A.
From: feedback@metro.net [mailto:feedback@metro.net]
Sent: Thursday, July 22, 2010 5:12 PM
To: WilshireBRT
Subject: [Metro.net] customer comment

Comment from

First Name: John 
Last Name: Heidt
Email: jheidt@heidttorres.com
Phone: 310-593-0093 x108
URL: 

The high speed bus lane on Wilshire in the Westwood area is a very bad idea due to the fact that during rush hour it proved to be a disaster between Veteran and Centinela during the test period a few years ago. I experienced it on a daily basis when it was operating. The gridlock of cars was insane. My wife received multiple tickets as she could not get over within a block of turning into the bus lane from side streets. MTA reliability relative to time between stops may have improved but for automobile drivers it was a total nightmare. My drive home from Centinela to Westwood without traffic is 7 minutes, during rush hour it is 20 minutes and during the test period it was 50 minutes.

Westwood in the residential condo corridor is a neighborhood. We do not need high speed buses in our neighborhood. There is already too much asphalt and concrete in this area. The idea of removing the jut outs is an awful idea. This would negatively impact the residences, churches, synagogues, and the preschool play yard at the Westwood United Methodist Church. Bus traffic in this area is mostly unimpeded during rush hour at this time in any event but again more importantly why would we want high speed busses in a residential neighborhood?

Based upon all the MTA meetings on the subway Westwood is very much in favor of the 3010 plan for the subway. I will ride the subway and happily park my car at my office for extended periods of time to ride the subway. For my line of work I have to be on a schedule and the bus simply does not work on a schedule. The bottle neck of all bottle necks for the bus is Beverly Hills and Beverly Hills is not going to participate in the bus lane as proposed. My understanding is they want the subway too.

My recommendation to the MTA is to push the 3010 plan and forget about this bus lane idea on the Westside. It is not needed in the corridor of condos and will prove a disaster between Veteran and Centinela same as it did a few years ago.

Please let me know if you would like to use the Westwood United Methodist Church for additional meetings for the subway.

Thank you.

John Heidt
COMMENT LETTER NO. 63
Heidt, John

Response to Comment No. 63-1

Please refer to Master Response No. 4 regarding the differences between the proposed project and the Bus Lane Demonstration Project.

Response to Comment No. 63-2

Please refer to Master Response No. 12 regarding the bus speeds between Comstock Avenue and Westwood Avenue and Master Response No. 14 regarding pedestrian safety.

Response to Comment No. 63-3

It will be several years before the Metro Purple Line Subway servicing the Westwood area is completed. Even after completion, bus service on Wilshire Boulevard would remain to serve those riders who choose not to take rail and to carry rail riders from rail stations to their origins/destinations along the Wilshire corridor.

Response to Comment No. 63-4

Comment noted; please refer to Response to Comment Nos. 63-1 and 63-3 above.
Hello,

I'd like to make three points:

1. I support the findings of the draft EIR.

2. I urge MTA and LA City Council to adopt the "Alternative A" proposal with one minor amendment. Amend the proposal to include Valencia to Parkview St. segments in the project where the Westlake/Alvarado community resides.

3. I support the expedient implementation of the Wilshire Bus-Only Lanes Project.

Bus and Metro Rail lines will improve Los Angeles infrastructure and provide affordable alternatives to transportation costs as well as reduce congestion, road repair, accidents, traffic, provide cleaner air and improve travel times. The benefits are numerous.

Sincerely,

Lisa Henschel
COMMENT LETTER NO. 64
Henschel, Lisa

Response to Comment No. 64-1

This commenter supports the proposed project and urges adoption of Alternative A with the inclusion of the segment between Valencia Street and Park View Street; the comment has been noted and will be forwarded to the decision makers for their consideration.

Please refer to Master Response No. 7 regarding the request to include the segment between Valencia Street and Park View Street in Alternative A.
I support the development of bus only lanes for Rapid Buses on Wilshire Boulevard. I spoke at the Metro/LADOT meeting, June 30, at the Felicia Mahood Center, West Los Angeles on the subject, and wish to add my comments in writing.

The creation of the bus only lanes is only a partial aspect of improving bus travel, particularly with the articulated buses in use by Metro. I have been a consistent bus rider since 1992, and ride rapid buses on Wilshire Blvd, and the 704 on Santa Monica Blvd., and the 751 through Westwood Village to the Getty Center.

If this project only focuses on the creation on the Rapid Bus lanes, and does not make improvements at the Rapid Bus stops, then it will be a failure and will not attract new riders.

One problem with the articulated buses is that the front door swings outward and then glides along the outside of the bus. At many Rapid Bus stops this is a problem due to high curbs. The streets of Los Angeles carry not only vehicles, but when it rains, they act as creeks and rivers to quickly move the water off the streets into the storm drains. To direct the rain water, the curbs are high, otherwise the water would rise up onto the sidewalks and onto property.

If the articulated buses stop too close to the high curbs, then the front door hits the curb and cannot open. Sometimes the door is wedged, and the bus cannot move. To make sure the door opens, the Rapid Buses then stop at a distance from the curb. This makes for a clumsy and difficult boarding and disembarking. The rider must step off the sidewalk into the street, and then into the high bus, and vice versa when departing.

There was no forethought in planning when these articulated buses began service, and that makes it very difficult for bus riders, particularly senior citizens; people with walking problems; women carrying a baby and stroller or pulling an infant along; or people carrying rolling attaches. If it is raining, the bus rider must step into the wet street, sometimes in deep water, to get into and out of the bus. This is not acceptable, and this problem with the front door must be addressed in this project.

Another major problem are the back doors of the articulated buses which many times open onto obstacles or a driveway cut-outs in the curbs which make for a very steep step down when disembarking.

Below are photos I've taken of the Wilshire Rapid Bus, Nos. 1 and 2, and the Santa Monica Rapid Bus, the remaining photos.

The Wilshire Rapid Bus photos, 1 & 2, are the stop at Westwood Blvd. This stop is on the west side of the intersection. When the back door opens there are a concrete trash can and tree, with a hole around it, in the way. This is not only awkward, it is a hazard, and it is without excuse. How could a transit system and city transportation department in one of the major cities of the world allow this to happen?

I've called Metro and LADOT about this stop, and nothing has changed.

Bus riders are instructed on the the articulated buses to depart via the back doors, so this is not a secret that passengers must depart this way. But it is obvious that no thought was given to the doors on the articulated
buses, and indeed, thought must be given on the processes involved with passengers getting onto and off any and all buses.

The other photos are from the Santa Monica Blvd. Rapid Bus. They show that the back door exit is at a driveway cut-out. This makes for a very steep step, which it can be hazardous. Moreover, if it is raining, the departing bus rider is forced to step into the gutter carrying water. This is an insult to bus riders, and wrong since this can be avoided by planning.

Since I'm informing you of these situations, Metro and LADOT must carefully study and plan each and every Rapid Bus stop in this project to avoid these hazardous situations, and situations which make riding the bus in Los Angeles a journey more difficult than it needs to be.

If the new Rapid Bus lanes are to be successful, then careful planning must be made for each and every Rapid Bus stop to avoid there poorly planned and horribly executed bus stops.

Matthew Hetz
Los Angeles
Member, Los Angeles Council District 11 Transportation Commission
Santa Monica and Barrington stepping onto the driveway cut-out. If it was raining, it would be full of water.
Santa Monica and Bundy
Notice how much of the woman's leg is cut off in photo, indicating the steepness of the step.
COMMENT LETTER NO. 65
Hetz, Matthew

Response to Comment No. 65-1
This commenter supports the proposed project; the comments regarding improvements at the BRT stops have been noted.

Response to Comment No. 65-2
The suggestions regarding bus specifications and bus loading and unloading features have been noted.
Subject: Wilshire Blvd bus only lanes
Date: Monday, July 12, 2010 1:02 AM
From: DENNIS HINDMAN <dennis.hindman@att.net>
To: Wilshire BRT wilshirebrt@metro.net

It is imperative that the implementation of the bus only lanes include the right to ride a bicycle in that lane during those hours. If bicycles are prohibited then most people who would want to ride down Wilshire Blvd during peak hours will be effectively excluded from this street during this time as riding in the next lane will put the bicyclist in between two travel lanes which will greatly increase their level of danger.
COMMENT LETTER NO. 66
Hindman, Dennis

Response to Comment No. 66-1

Bicycles would be allowed to operate in the bus lanes.
Dear L.A. County MTA:

The following are comments, due today (July 26, 2010), on the DEIR for the proposed Wilshire Bus Rapid Transit Project. My contact information remains the same as for my scoping comments, which are incorporated herein by reference (many are not addressed in the DEIR).

Except where explicitly indicated, in these comments “DEIR” refers to the whole document under review, including the Draft EA (or EIS) provisions prepared for federal purposes. Also, in these comments “right lanes” generally means what the DEIR calls “curb lanes.” Where these comments state that the DEIR is inadequate, that statement means a new DEIR should be prepared and circulated (or “recirculated,” if that is the proper term), and it would be premature and possibly contrary to law to move forward with the preparation or circulation of any so-called “final” document.

For 5 hours a day on weekdays, the project would turn portions of Wilshire Boulevard into “hate zones”. These hate zones would be filled with unwanted noise, pollution, traffic congestion, and police. This is not idle speculation. Actual experience with imposing this project’s rules on the section of Wilshire in the City of Los Angeles west of Federal Ave was miserable for people in the area. Miserable.

The DEIR states that there was a 14% increase in bus speed during this miserable experience, but does not cite a report or data to substantiate this claim. Even so, that would amount to going at most 2 or 3 miles per hour faster. That cannot be worth the disruption caused. By itself, failure to substantiate that claim renders the DEIR inadequate. So does failure to address the miserable previous experience in any detailed way. So does failure to cite and make available studies that exist of that miserable experience.

I myself was awakened from sleep several times during the miserable experience by the sirens of police (usually Sherriff’s motorcycles, it seems) vainly trying to keep the right lanes clear of non-bus traffic. But cars often could not make right turns from side streets onto Wilshire without at least momentarily stopping and blocking potential bus travel in the right lane. (When I took the bus during the miserable experience, it did not seem like buses arrived any more frequently.) (When I rode a bicycle in the right lane then [it was permitted], I was able to use the lane better than buses were. I would try to let buses pass me when and if they approached, which was generally feasible only at intersections.)

To ignore the actual significant experience of noise during a real-life trial, in submitting an environmental document to support an application for government funds, would be to lie in contravention of the law. This document, the DEIR, does ignore that experience, and does ignore or fail to present readily-obtainable actual experiences or data, instead of estimations from models. (Air pollution was significantly increased, for example, as could be noticed by sight or smell, as motor vehicles were more clustered and started and stopped more times per block travelled.) For this reason among others, a new DEIR must be prepared and circulated.
As far as I can tell, the DEIR similarly ignores the increased hazard to waiting passengers (often including high school students) and other pedestrians from narrowing the sidewalk containing the bus stop by the 7-11 store parking lot between Barrington and Federal. The sidewalk there is already often filled with people overflowing into the parking lot. Narrowing it risks pushing people into Wilshire traffic or into the path of motor vehicles in the parking lot. In response, the 7-11 store management or the property owner might put up a fence or landscaping to separate the sidewalk from the parking lot, which would only further increase the likelihood of student horseplay resulting in a tragic accident. Police motorcycle travel or an increase in bus speed would add to this hazard risk.

I reserve the right to sue under the federal False Claims Act (or other applicable law) if this DEIR, or a false, incomplete, inadequate document like it, is submitted to the federal government. To preserve my rights under that law, I am transmitting copies of this comment letter to the offices of the U.S. Attorney for the Central District of California and my U.S. Representative. Currently, the Wilshire BRT project appears to be primarily an effort to obtain federal funds for road repairs, an effort that disregards the environmental and social costs of imposing unnecessary restrictions on a vital, historic, public facility.

Concerns re Presentation.

The text and some tables of Appendix C are largely duplicative of material in the Air Quality and EA chapters of the DEIR. This is a waste of paper, energy, ink and readers’ time. That material should be presented once, in the body of the EIR chapters, if it is necessary at all.

Concerns re Definitions, Cumulative Impacts, and Consistency with an AQMP, RTIP or RTP.

Consistency with an Air Quality Management Plan, Regional Transportation Improvement Plan or Regional Transportation Plan is not all that need be considered to determine the significance of cumulative impacts. The lead agency must make its own determination of significance. The DEIR does not make that clear and is inadequate. In fact, the DEIR wrongly cites part of a CEQA guideline to imply the opposite. On page 48 of Appendix C, use of the conclusory phrase "As such" falsely implies that the preceding factors are the only things that may enter into a determination regarding the significance of cumulative impacts.

The DEIR attempts but fails to waive away concerns about cumulative impacts on air quality by reference to an AQMP and its subsidiary RTP. Increased fuel burning by non-MTA vehicles slowed by project-related congestion is not accounted for, for example. Increased travel time is associated with increased emissions when travel is below optimal speeds for efficient use of fuel. In areas out of attainment for air quality standards, any increase in emissions of pollutants or precursors may be significant. The same goes for GHG emissions. The subject DEIR does not sufficiently address these issues.

The DEIR misquotes and misapplies CEQA guidelines § 15064(h)(3). The quote in the DEIR is incomplete and inaccurate. Moreover, this subsection of the guidelines is intended for use only when deciding whether or not an EIR must be prepared. So it is not valid for use in an EIR.

Just as merely including the word “Bus” in a proposal does not automatically mean the proposal is good, simply slapping the word “Rapid” on a proposal does not automatically mean the proposal would transform slow transportation to “rapid transportation” in the commonly understood sense of the term. To establish consistency with the description in the RTP, the DEIR must first define BRT, particularly the “R” part. Of particular difficulty may be explaining why buses that already display the label “Rapid” require a project like
the one proposed to be considered actually rapid. Is the “Rapid” false advertising? Since it lacks an adequate explanation of this issue, the DEIR is inadequate.

To my knowledge, the only available description of the 2008 RTP plan referenced in the DEIR, RTP ID LA29202W, is “MID-CITY TRANSIT CORRIDOR: WILSHIRE BLVD. FROM VERMONT TO SANTA MONICA DOWNTOWN- MID-CITY WILSHIRE BRT INCL. DIV. EXPANSION” [emphasis added]. (In some older documents (e.g., http://www.aqmd.gov/ceqa/documents/2007/aqmd/is_nop/07aqmp/appB.doc), it is described as “MID-CITY TRANSIT CORRIDOR: WILSHIRE BLVD. FROM VERMONT TO SANTA MONICA DOWNTOWN- MID-CITY WILSHIRE BRT INCL. DIV. 10 EXPANSION” [emphasis added]. This description is internally contradictory, because nothing west of I-405 is considered “Mid-City” in anyone’s reasonable estimation. Vermont Avenue is in Koreatown, and not in Downtown Los Angeles, so the word “downtown” must refer to Santa Monica. Perhaps the BRT (whatever that means) part of this project was intended to be limited to the actual Mid-City area, but the listed funding was intended to be used, in part, for the sorely needed repaving or resurfacing of the right lanes of Wilshire all the way from Koreatown (Vermont Ave.) to Wilshire’s westward end, possibly to protect buses from damage or to protect passengers’ nerves. An adequate DEIR would have elaborated on the description in the RTP (and explained the abbreviation “DIV.”) and at least attempted to demonstrate that the currently proposed project is consistent with that definition. This DEIR did not, and is inadequate.

Given that the project description in the RTP includes does not exclude the Beverly Hills or Santa Monica portions of Wilshire Blvd (downtown Santa Monica), even by the expansive definition of the Bayside District Corporation [a public-private management company that oversees Downtown Santa Monica], does not begin until 7th Street when travelling westbound on Wilshire [http://downtownsm.com/about/index.html]), the apparent refusal by Beverly Hills and Santa Monica to participate in the project is evidence that some officials or civic leaders are concerned about the disruption or environmental impacts it would cause. Failure to document and address those concerns in the DEIR is a further indication of the DEIR’s inadequacy and another reason a new DEIR must be prepared.

With regard to greenhouse gases, the DEIR suggests that emissions from project and would be “negligible,” and includes the inane statement, “The proposed project’s amount of emissions, without considering other cumulative global emissions, would be insufficient to cause climate change.” By what standard would GHG emissions be “negligible”? Did the analysis here include increased travel time (and hence emissions) for the same number of private vehicles? Or, in the alternative, did it assume forcing people onto buses (which would be a civil rights violation -- see below)? In this regard, the DEIR is inadequate.

Additional Concerns re Environmental Assessment Chapter.

The DEIR’s Chapter 7, Environmental Assessment, on p. 7-11, says “localized operational air quality impacts related to criteria pollutants, would not be considered substantially adverse” but only one pollutant, carbon monoxide, was considered. Here, again, the DEIR is inadequate.

Also on p. 7-11, the DEIR states, “The proposed action would be expected to reduce air pollutant emissions by encouraging more commuters to leave their cars and ride the CNG powered buses.” The DEIR appears to be inadequate with regard to that statement because nowhere did I see an analysis of bus ridership effects of the project (or proposed action, whatever the proper term is), car trip effects, or of emissions from affected car trips, which would likely, as suggested above, be substantially increased due to increased travel time and associated increased and more inefficient fuel burning.
The DEIR is also inadequate because it did not address civil rights impacts of the proposed action/project. Peak-hour buses on Wilshire in the project area are already visibly crowded beyond the load factor found by a federal court to constitute a civil rights violation during the pendency of the consent decree resulting from litigation involving the Bus Riders Union. Also plainly visible is the largely non-white appearance of the over-packed riders. Regardless of whether racial discrimination is involved, a court would likely find action intended to be “encouraging” (which is not too far from “forcing”) people to travel on overcrowded buses to be a civil rights or constitutional violation. I reserve the right to bring a lawsuit to redress such a violation on behalf of myself, a group of plaintiffs, or a class.

As far as I can tell, nowhere in the DEIR does MTA commit to, or analyze, adding buses or bus trips to the Wilshire corridor in order to reduce overcrowding. Did I miss something?

Note: the schoolchildren who ride the bus from the stop near the 7-11 store between Barrington and Federal are overwhelmingly non-white, and they mainly ride from there in non-peak hours, so would not benefit from the project, but would be burdened by project construction and from the narrowing of the sidewalk (discussed above). The DEIR is inadequate for not discussing this and things like it at least under the heading of environmental justice. Looking at near-project residence census data is simply not enough.

On p. 7-12, the DEIR notes “SCAQMD recommends that a health risk assessment (HRA) be conducted for projects that emit substantial diesel particulate emissions”. Well, operation of the proposed project would cause substantial diesel particulate emissions by causing more starting and stopping of the existing diesel vehicle traffic which would be crammed into fewer lanes with slower travel and fewer vehicles getting through intersections per traffic light cycle. So by not including such an HRA, the DEIR is inadequate.

Also on p. 7-12, the DEIR misleadingly says, “Since the proposed action would operate CNG buses rather than diesel buses and would not result in the emission of acute and/or chronically hazardous TAC pollutants, an air toxics HRA is not warranted.” This suggests to the reader that diesel buses would be replaced, which is not true. In addition, as far as I can tell, the project/action would does not involving adding any additional CNG buses to Wilshire travel. Furthermore, the action *would* result in TAC emissions from re-directed and slowed traffic. This statement is a further indication that the DEIR is inadequate. Finally, the DEIR should present the results of an air toxics HRA.

On p. 7-31, the DEIR says, “The proposed action would convert existing curb lanes on Wilshire Boulevard to bus and right-turn only operation in the peak periods on weekdays.” But I was under the impression that bicycle travel would also be allowed in the right lanes of Wilshire then. This should be clarified.

The noise section of Chapter 7 completely ignores honking horns and police sirens, although in the previous implementation of a smaller version of the proposed action/project, horn honking and police sirens were intolerably increased. Failure to report these known adverse effects amounts to fraud. The DEIR is inadequate in this regard, and would cause a False Claims Act violation if submitted to the federal government.

Page 7-71 of the DEIR claims that there would be “No adverse impacts related to safety and security” because the proposed action/project would not “substantially change the operation of the Wilshire Metro Rapid bus service.” This appears to be an admission that the action/project would not provide benefits sufficient to support a statement of overriding considerations for CEQA purposes. Moreover, if the project/action would in fact increase speeds of large vehicles such as those currently operated by the Rapid bus service, it stands to
reason that increased safety hazards would be associated with that increase in speed. People have died from traffic accidents, including vehicle-pedestrian accidents, along the corridor. The right lane and sidewalk on Wilshire in the L.A. County portion of the project area (federal land) are particularly dangerous. The DEIR is inadequate in its consideration of safety hazards.

**Additional Concerns re Air Quality.**

On page 4.2-1, the DEIR states that its air quality analyses are based on three SCAQMD guidance documents. The first of these is out-of-date. The second is designed for square project sites, not miles-long single-lane (or two single-lane) sites. The third shares that lack of “fitness for purpose” here and contains errors in its derivation. In this regard, therefore, the DEIR is inadequate.

Moreover, the lead agency must make its own independent determination of what is or is not significant. The SCAQMD documents are not binding on the lead agency. Thus, throughout, the DEIR is inadequate where it simply states that impacts would not be significant or would be less than significant, without qualifying those statements by reference to the standards used, or without notice to the reader that other criteria for significance may be used.

On p. 4.2-1, the definition of “criteria” pollutants is wrong.

The project would modify an existing TAC emissions source, the emissions from existing traffic on Wilshire. That traffic, with the possible exception of buses, would be slowed, resulting in increased TAC emissions. The DEIR is inadequate for not considering this.

The statement that the project “would facilitate the movement of existing traffic through the study corridor” is a flat-out lie.

Regarding the analysis beginning on p. 4.2-22, it is not clear if the C term, capacity, was appropriately decreased to reflect the fewer lanes available for non-bus vehicles at project-affected intersections. The DEIR is inadequate for not presenting that clearly.

Contrary to the DEIR’s treatment of odors (Impact AQ4), the project would create objectionable odors. Previous experience with implementation of a smaller version of the project west of Federal Avenue involved increased starting and stopping, and slower movement, including more per-block presence time, of stinky vehicles. The odor of diesel exhaust was palpably increased, and the failure of the DEIR to include survey data about that, and other issues, renders it inadequate.

Similarly, the air emissions and dispersion models used in the DEIR do not account for “puffs” of pollutant emissions coming from diesel and other vehicles as they start up from being stopped. This, too, shows that the DEIR is inadequate.

The analysis of GHG emissions (Table 4.2-8) should include operations, as the project would likely cause increased vehicle running time, and an associated increase in GHG emissions, for vehicles not permitted in Wilshire Boulevard’s right lanes. The DEIR is inadequate in that regard.

The DEIR states on p. 4.2-31 that “the proposed project would reduce GHG emissions, compared with existing conditions, by improving traffic circulation and relieving local congestion.” That is a flat-out lie. (The project
would impede traffic circulation and exacerbate local congestion.) It is even contradicted by data in the CO hotspots analysis. With a statement like that, the DEIR is clearly inadequate.

- David A. Holtzman, M.P.H., J.D.
COMMENT LETTER NO. 67
Holtzman, David

Response to Comment No. 67-1

Comment noted.

Response to Comment No. 67-2

The demonstration project was markedly different from the proposed project in several important aspects. First, the demonstration project created adverse traffic impacts along the segment of Wilshire Boulevard between Barrington Avenue and Federal Avenue due to the conversion of the eastbound mixed-flow curb lane into a bus lane. The loss of the mixed-flow lane created a significant traffic bottleneck and delays that extended back from Federal Avenue to Bundy Drive. In contrast, the proposed project would widen the south side of Wilshire Boulevard between Barrington Avenue and Federal Avenue and install the proposed bus lane on the roadway gained from the widening. There would be no reduction in the number of the existing mixed-flow lanes. Consequently, the adverse traffic impact of the demonstration project is expected to be eliminated by the proposed roadway widening. Please refer to Master Response No. 4 regarding other differences between the proposed project and the Bus Lane Demonstration Project.

Response to Comment No. 67-3

A “Before-and-After” study was conducted on the demonstration project in 2004 by Korve Engineering. The Before-and-After study showed up to a 14% improvement in bus travel times in this one-mile segment, but most importantly, service reliability was significantly improved, which is another key goal of this project. This was particularly true on days and times when roadway congestion seemed unusually higher than normal. Please refer to Master Response No. 4 regarding the differences between the proposed project and the Bus Lane Demonstration Project.

Response to Comment No. 67-4

The bus lanes would need to be patrolled heavily at first in order to keep the curb lanes clear of non-bus traffic and until people can become accustomed to them. Once people are used to the bus lanes, the frequency of patrolling can taper off. People wishing to make right turns from side streets or from out of driveways, would be allowed enough time to merge safely onto regular traffic without getting ticketed.

Response to Comment No. 67-5

Comment noted. However, actual noise measurements were conducted on December 4, 2009 to evaluate existing sound levels and assess potential project noise impacts on the surrounding area. In addition, the SCAQMD screening criteria were developed in part on actual odor complaints. According to the SCAQMD CEQA Air Quality Handbook (South Coast Air
Quality Management District 1993), land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project not would include any uses identified by the SCAQMD as being associated with odors and, therefore, would not produce objectionable odors.

Response to Comment No. 67-6

The Draft EIR/EA fully considered the potential impact of the proposed sidewalk reduction, and determined that the reduction would have no significant impact on either pedestrians or traffic safety or impede pedestrian or traffic movement. In addition, the proposed width of the new sidewalks would comply with all federal and state Standard Specifications for Major Streets, such as Wilshire Boulevard, as well as the ADA sidewalk standard.

Response to Comment No. 67-7

The comment has been noted and will be forwarded to the decision makers for consideration.

Response to Comment No. 67-8

Contrary to the commenter’s assertion, CEQA Guidelines Section 15064(h)(3) makes is very clear that a Lead Agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project would comply with the requirements in a previously approved plan or mitigation program, which provides specific requirements that would avoid or substantially lessen the cumulative problem (e.g. water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located, as long as such plans or programs are specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. The SCAQMD 2007 AQMP, the SCAG 2008 RTP, and the SCAG 2008 RTIP have all been adopted by the public agency with jurisdiction over the affected resources through a public review process. Cumulative impacts were evaluated consistent with SCAQMD requirements, which is the public agency responsible under the federal Clean Air Act for bringing the region into attainment status for all criteria pollutants.

Response to Comment No. 67-9

As discussed in Response to Comment No. 67-8 above, cumulative impacts were evaluated consistent with SCAQMD requirements, which is the public agency responsible under the federal Clean Air Act for bringing the region into attainment status for all criteria pollutants. As discussed in Response to Comment No. 55-4, GHG emissions were evaluated consistent with CEQA Guidelines revisions related to the evaluation of GHG emissions adopted in December 2009 that became effective in March 2010. Criteria pollutant emissions and GHG emissions were both addressed in the Draft EIR/EA.
Response to Comment No. 67-10

Please refer to Response to Comment Nos. 67-8 and 67-9 above,

Response to Comment No. 67-11

Please refer to Response to Comment No. 67-12 below.

Response to Comment No. 67-12

The description of the 2008 RTP referenced in the Draft EIR/EA (RTP ID No. LA29202W) was modified to include the current project as well. The description now includes the 12.5-mile corridor project with 9.6 miles of peak period bus lanes on Wilshire Boulevard from Valencia Street to the City of Santa Monica city limit, excluding the City of Beverly Hills. The project consists of selective street widening, selective curb lane reconstruction/repaving, improved traffic signal timing, and improved bus signal priority.

Response to Comment No. 67-13

Please refer to Master Response No. 17 regarding the non-participation of the Cities of Beverly Hills and Santa Monica.

Response to Comment No. 67-14

As discussed in Response to Comment No. 55-4, GHG emissions were evaluated consistent with CEQA Guidelines revisions related to the evaluation of GHG emissions adopted in December 2009 that became effective in March 2010. In addition, development of public transit infrastructure is consistent with the State goal (per SB 375) of reducing GHG emissions associated with passenger vehicle travel by promoting alternative transportation choices, among other measures.

Response to Comment No. 67-15

The Draft EIR/EA followed the SCAQMD prescribed methodology for evaluation of localized impacts related to criteria pollutants during long-term operations.

Response to Comment No. 67-16

The Draft EIR/EA statement referenced by the commenter neither provides a significance conclusion nor the basis for a significance determination under CEQA.

Response to Comment No. 67-17

Buses are scheduled on every corridor, including Wilshire Boulevard, to meet passenger demand. The implementation of bus lanes on Wilshire Boulevard would not only help reduce passenger travel times, but, most importantly, the improved travel times would remain relatively constant over time due to the
separation of the bus lanes from mixed-flow traffic. LACMTA believes this would help with the overcrowding since there would be less bus bunching and passenger loads more evenly distributed. These improved travel times and consistencies would allow for improved operating efficiency and the ability to provide more trips without the need to increase the existing fleet size.

**Response to Comment No. 67-18**

Please refer to Response to Comment No. 67-17 above.

**Response to Comment No. 67-19**

The commenter’s assertion that there are civil rights impacts and impacts to non-white members of the public are unsubstantiated claims supported by no evidence. Please refer to Response to Comment No. 35-6 regarding impacts associated with the reduction of sidewalk widths.

**Response to Comment No. 67-20**

As discussed in the Draft EIR/EA on page 4.1-15, “...drivers respond to changes in speed and capacity of the roadway network. If a roadway’s capacity is reduced, as is the case along Wilshire Boulevard, traffic will divert to other routes that may offer faster travel times...” Based on SCAQMD screening criteria, a quantitative HRA is not warranted. SCAQMD recommends that a health risk assessment (HRA) be conducted for projects that emit substantial diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) or certain industrial projects that result in the emitting of acute and/or chronically hazardous TAC pollutants. Since the proposed project would not change bus operation along Wilshire Boulevard, it is not anticipated to measurably change the emission of acute and/or chronically hazardous TAC pollutants. Therefore, an air toxics HRA is not warranted.

**Response to Comment No. 67-21**

Please refer to Response to Comment No. 67-20.

**Response to Comment No. 67-22**

Not only would the existing curb lanes on Wilshire Boulevard be converted to bus and right-turn only operation during the peak periods on weekdays, but bicycles would be allowed to use the bus lanes as well.

**Response to Comment No. 67-23**

The bus lanes would need to be patrolled heavily at first in order to keep the curb lanes clear of non-bus traffic and until such time that people become accustomed to them. Once people are used to the bus lanes, patrolling can taper off. In addition, these bus lanes would not be implemented prior to
7:00 a.m. on weekdays or extend beyond 7:00 p.m. (bus lanes would operate from 7:00 a.m. to 9:00 a.m. and from 4:00 p.m. to 7:00 p.m.).

**Response to Comment No. 67-24**

The statement was not to imply that the project wouldn’t provide benefits sufficient to support a statement of overriding consideration for CEQA purposes. The statement simply meant that Metro Rapid and Local service on Wilshire Boulevard would continue to operate as it does today on Wilshire Boulevard. However, with the improved bus travel times and service reliability, more trips can be provided with the same fleet size. The separation of buses from mixed-flow traffic would also help to improve overall safety as the two highest causes of accidents are cars either running into the back of the buses at bus stops or sideswiping buses while trying to get around them. In addition, buses are never allowed to exceed the posted speed limit.

**Response to Comment No. 67-25**

The commenter’s assertions that the SCAQMD guidance documents are out of date and/or are inappropriate are not accurate. All significance conclusions were based on clearly defined thresholds that are sufficiently referenced/sourced within the Draft EIR/EA.

**Response to Comment No. 67-26**

The commenter’s assertions that the SCAQMD guidance documents are out of date and/or are inappropriate are not accurate. All significance conclusions were based on clearly defined thresholds that are sufficiently referenced/sourced within the Draft EIR/EA.

**Response to Comment No. 67-27**

No definition of “criteria pollutants” is provided on page 4.2-1 of the Draft EIR/EA. Rather, there is a sub-section heading titled “Criteria Air Pollutants,” following which there is a discussion of criteria pollutants.

**Response to Comment No. 67-28**

Please refer to Response to Comment No. 67-20.

**Response to Comment No. 67-29**

One of the goals of the proposed project is to “improve traffic flow along Wilshire Boulevard.” The proposed project includes the reconstruction of the curb lanes for a substantial portion of the corridor. With implementation of the proposed project, buses would be instructed to use the curb lanes except to pass. Currently, buses use all of the lanes. By concentrating the buses in the curb lanes during peak hours, traffic flow would be improved because buses would not make as many lane changes that are disruptive to the overall flow of traffic. The proposed project also includes upgrades to the transit
signal priority on Wilshire Boulevard. These upgrades would extend the green indication for all vehicles on Wilshire Boulevard when a bus approaches an intersection, resulting in fewer stops by buses that impede traffic flow. The proposed project also includes widening Wilshire Boulevard between Barrington Avenue and Bonsall Avenue to create a new eastbound bus lane. This additional capacity would improve traffic flow in this area. The proposed project would lengthen the eastbound left-turn pocket at Sepulveda Boulevard for traffic making a left-turn from eastbound Wilshire Boulevard to northbound Sepulveda Boulevard. Currently, that traffic often spills onto and blocks one of the through lanes. By eliminating this spillover from the left-turn pocket, the proposed project would improve traffic flow in this segment.

**Response to Comment No. 67-30**

Please refer to Master Response No. 16 regarding traffic flow from Beverly Hills and the impacts of reducing the number of mixed-flow lanes that would create backups from Beverly Hills to Comstock Avenue.

**Response to Comment No. 67-31**

Comment noted. However, the SCAQMD screening criteria were developed based in part on actual odor complaints. According to the SCAQMD CEQA Air Quality Handbook (South Coast Air Quality Management District 1993), land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project would not include any uses identified by the SCAQMD as being associated with odors and, therefore, would not produce objectionable odors.

**Response to Comment No. 67-32**

The micro-scale dispersion modeling conducted as part of the Draft EIR/EA air quality analysis is consistent with the SCAQMD prescribed methodology, which is a methodology that is recognized by the USEPA as a conservative method to evaluate mobile-source air pollutant emissions and related concentrations.

**Response to Comment No. 67-33**

The proposed project is not anticipated to have a material effect on vehicle running time. As discussed in the Draft EIR/EA on page 4.1-15, “...drivers respond to changes in speed and capacity of the roadway network. If a roadway’s capacity is reduced, as is the case along Wilshire Boulevard, traffic will divert to other routes that may offer faster travel times...” In addition, development of public transit infrastructure is consistent with the State goal (per SB 375) of reducing GHG emissions associated with passenger vehicle travel by promoting alternative transportation choices, among other measures. The proposed project would have no meaningful effect on long-term GHG emissions when compared to the No Project Alternative.
Response to Comment No. 67-34

Development of public transit infrastructure is consistent with the State goal (per SB 375) of reducing GHG emissions associated with passenger vehicle travel by promoting alternative transportation choices, among other measures. Over the long term, GHG emissions would be reduced as more travel demands are served via an increasingly efficient and assessable public transportation system instead of single-occupant vehicles.
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I don't know how to enter our names in opposition to the bus-only lanes, but please enter us:

Lynn and David Horowitz
908 Westholme Avenue
Los Angeles, CA 90024
310-279-2291
e-mail: [redacted]
COMMENT LETTER NO. 68
Horowitz, David and Lynn

Response to Comment No. 68-1

The commenters oppose the proposed project; the comment has been noted, and the commenters' names have been added to the project's database.
Dear Sir:

I would like to submit the following comments regarding the Wilshire BRT DEIR:

1. I support the findings of the DEIR
2. Of the three Alternatives, I support Alternative A
3. I support the expedient implementation of the Wilshire Bus-only Lanes Project
4. I urge the addition of a new stop for the 720 Red Line service at the corner of Rimpau and Wilshire. The current 720 service does not have a stop between Crenshaw and La Brea, a span of 1.4 miles, the longest interval between stations on the entire line. By placing a stop at Rimpau/Wilshire, the distance between stops will be more consistent with the other intervals between all other 720 stations. Within 0.5 miles of this Rimpau/Wilshire lies numerous office buildings, including the headquarters of Farmer’s Insurance; schools, including Los Angeles High School and John Burroughs Middle School; and many residences. These locations cannot be comfortably served by either Crenshaw/Wilshire and LaBrea/Wilshire. As such I urge that the Project include a new stop at the corner of Rimpau and Wilshire for the 720 line.

Sincerely,

Daniel Hsieh
COMMENT LETTER NO. 69
Hsieh, Dan

Response to Comment No. 69-1

This commenter supports the proposed project; the comment has been noted and will be forwarded to the decision makers for their consideration.

Please refer to Master Response No. 7 regarding the request to include the segment between Valencia Street and Park View Street in Alternative A.

Response to Comment No. 69-2

The proposed project does not involve any changes to the bus service or operation. The primary goal of the proposed project is to improve bus passenger travel times and bus service reliability by allowing buses to travel in dedicated peak-period bus lanes for the majority of the alignment. The commenter is encouraged to contact a Metro Passenger Relations Representative at (213) 922-6235 or (800) 464-2111 or by e-mail at customerRelations@metro.net for questions/suggestions regarding the current bus service.
I am in favor of Wilshire Bus Transit Metro's proposal of making one lane a bus lane on Wilshire Blvd. For the last 3 years I have been commuting from Miracle Mile to Downtown LA via the 720 and then taking the Metro purple line to downtown Los Angeles. I purposefully avoided taking the 720 all the way downtown because the congestion defeated the whole transit bus purpose. On a typical day, the 720 gets caught up in traffic with all of the commuting vehicles. There is nothing rapid about the 720, other than the fact that it stops less than the 20. If you want to increase bus ridership you have to make it faster and more efficient for commuters to trade in their cars. As long as they are in the same lane as the buses they will have no incentive to get on the bus.

Many of my friends have told me that they don't want to have to wait for the bus to arrive, and that is the biggest factor in people not taking the bus. But if vehicle drivers see that the bus has priority over them, it the bus can get commuters to their destination faster, and if the wait time at the bus stop is diminished by the priority use of the street, drivers will think twice about driving to work.

As far as the businesses are concerned, many of them are already impacted by the no parking zone during rush hour already. These businesses have chosen to operate in a high density traffic area. They already have access to pedestrian customers who live and work in the area. They also may gain new customers with increased bus ridership. When I used to drive I had no reason to stop at any of the businesses located at Wilshire and Western or Wilshire and Vermont. I have visited many of the businesses located at these intersections during the last three years because of their accessibility to the metro stations.

Please, please, please make it easier to commute not harder.
COMMENT LETTER NO. 70
Ibanez, Tania

Response to Comment No. 70-1

This commenter supports the proposed project; the comment has been noted and will be forwarded to the decision makers for their consideration.
VIA E-MAIL

July 25, 2010

Martha Butler
LACMTA
One Gateway Plaza
Mail Stop: 99-23-1
Los Angeles, CA 90012

Re: Wilshire Bus Rapid Transit (BRT) Project

Dear Ms. Butler:

On July 23, 2010, the Mid City West Community Council (Mid City West) voted 26-5 to support the portion of the Wilshire Bus Rapid Transit project, Alternative A, that is included within our boundaries. Conceptually, we support the entire project, but recognize that some adjustments might be warranted to meet the needs of other neighborhoods.

The Mid City West Community Council is the official Los Angeles neighborhood council whose boundaries include the portion of Wilshire Boulevard between La Brea Avenue and the City of Los Angeles/ Beverly Hills border. Our 45-person board of directors represents a diverse array of stakeholders, including residents, businesses, schools and other groups. We believe that improved public transit service is an essential component of addressing traffic congestion in our neighborhood by providing alternatives to the automobile. The Wilshire BRT project will provide significant benefits to the transit-using members of our community, including seniors, disabled and youth who cannot drive; lower-income residents and workers who cannot afford cars; and those who use transit by choice.

The Draft Environmental Impact Report/Environmental Assessment (EIR/EA) indicates that the project will create significant impacts at three intersections in our neighborhood:

- Fairfax Avenue/Wilshire Boulevard (a.m. and p.m. peak)
- La Brea Avenue/Wilshire Boulevard (a.m. peak)
- Fairfax Avenue/Olympic Boulevard (a.m. and p.m. peak)
At the first two intersections, the impacts cannot be fully mitigated. Nevertheless, Mid City West supports the Wilshire BRT project.

Mid City West supports Alternative A in part because it would mean improvements to the curb lanes of Wilshire Boulevard between Fairfax Avenue and San Vicente Boulevard, within our boundaries. These lanes currently are in poor condition.

Also, we have concerns about the fact that the City of Beverly Hills is not currently participating in the project. If the project is approved, Mid City West requests that Metro and the City of Los Angeles ensure that transitions at or near San Vicente Boulevard do not create adverse impacts on our neighborhood.

Finally, the City of Los Angeles has adopted mitigation measures to address the impacts of other projects in our neighborhood, including construction of the Grove at the Farmers Market, and expansion of LACMA. In particular, the Grove Neighborhood Traffic Management Plan includes measures to reduce traffic on 6th Street between Fairfax and San Vicente; and traffic calming measures are being considered on 8th Street between Fairfax and La Brea. Mid City West does not wish to see these neighborhood protection programs undone in an effort to address potential impacts of the Wilshire BRT project.

Very truly yours,

Chair, Mid City West Community Council
COMMENT LETTER NO. 71
Jacobberger, Jeff, Chair
Mid City West Community Council

Response to Comment No. 71-1

This commenter supports the proposed project; the comment has been noted and will be forwarded to the decision makers for their consideration. As this comment does not state a concern or a question regarding the adequacy of the analysis in the Draft EIR, no further response is warranted.

Response to Comment No. 71-2

The commenter acknowledges the significant unavoidable traffic impacts at the intersections of Fairfax Avenue and Wilshire Boulevard and La Brea Avenue and Wilshire Boulevard, which are located in the Mid City West neighborhood. However, the commenter indicates that Mid City West remains in support of the project.

Response to Comment No. 71-3

Comment noted. As this comment does not state a concern or a question regarding the adequacy of the analysis in the Draft EIR, no further response is warranted. However, the comment will be forwarded to the decision makers for their review and consideration.

Response to Comment No. 71-4

Comment noted. Since the segment of Wilshire Boulevard within the City of Beverly Hills is not part of the project at this time, easy transitions at the city limits would be made. Transition areas of approximately 300 feet would be provided to allow through traffic to exit the bus lane. Appropriate signage would also be installed along Wilshire Boulevard, particularly near transition areas, to inform motorists of bus lane operation during peak hours.

Response to Comment No. 71-5

The proposed project would not affect the implementation of mitigation measures that have been adopted by the City for other projects in the neighborhood, including the Grove Neighborhood Traffic Management Plan.

The Draft EIR/EA investigated the potential traffic impact of the proposed project on the major roadways adjoining Wilshire Boulevard, including 6th Street, and determined that it would have no impact on the identified segment of 6th Street.
Hello,

My name is Cliff Jones and have been very much interested in the issue of public transit along Wilshire Blvd. I understand that there have been issues regarding continuing the subway along the blvd for many years...I think that a Trolleybus....similar to what's in use in San Francisco and Boston would be a fantastic option to consider....Thanks for your consideration...

Cliff Jones
San Diego

A Tree Is Known By The Fruit It Bears!

=====
Email scanned by PC Tools - No viruses or spyware found.
(Email Guard: 7.0.0.18, Virus/Spyware Database: 6.15500)
http://www.pctools.com
====
COMMENT LETTER NO. 72  
Jones, Cliff

Response to Comment No. 72-1

Comment noted. LACMTA is not considering a trolleybus project on Wilshire Boulevard at this time. As this comment does not state a concern or a question regarding the adequacy of the analysis in the Draft EIR/EA, no further response is warranted. However, the comment will be forwarded to the decision makers for their review and consideration.
Comment from

First Name: Gary
Last Name: Jornacion
Email: iamgary25@yahoo.com
Phone:
URL:

:My name is Gary Jornacion, this is my comment for Wilshire bus only lanes

1. I support the findings of the draft EIR.
2. I urge MTA and LA City Council to adopt the "Alternative A" proposal with one minor amendment. Amend the proposal to include Valencia to Parkview St. segments in the project where the Westlake/Alvarado community resides.
3. I support the expedient implementation of the Wilshire Bus-Only Lanes Project.

Riding the Metro for almost 2 years now, I found that it helped relieve the stress of traffic and driving within traffic. Improving the Rapid bus on Wilshire will encourage more people to take public transportation.

thank you
COMMENT LETTER NO. 73
Jornacion, Gary

Response to Comment No. 73-1

This commenter supports the proposed project and urges adoption of Alternative A with the inclusion of the segment between Valencia Street and Park View Street; the comment has been noted and will be forwarded to the decision makers for their consideration.

Please refer to Master Response No. 7 regarding the request to include the segment between Valencia Street and Park View Street in Alternative A.
Comment from

First Name: Neal
Last Name: Kaufman
Email: neal@4kc.biz
Phone: 
URL: 

I favor NO PROJECT for Wilshire BRT from Comstock Ave. to Glendon. I feel that this effort would cost the city money and would end up doing just the opposite (restrict traffic flow) of what is intended.
COMMENT LETTER NO. 74
Kaufman, Neal

Response to Comment No. 74-1

This commenter opposes the proposed project. The traffic study conducted for the Wilshire BRT Project examined impacts on traffic, recommended traffic mitigation measures, and identified traffic impacts that cannot be mitigated. As this comment does not state a concern or a question regarding the adequacy of the analysis in the Draft EIR, no further response is warranted. However, the comment has been noted and will be forwarded to the decision makers for their review and consideration.
I just want to voice my support for bus only lanes. It's long overdue, and especially for a road with as many transit users as Wilshire. Isn't it the highest bus ridership on a route in the nation? Some drivers will complain, but they will complain about everything. A bus with 50+ people on it should take priority over all the clogging single occupancy cars littering the road.
COMMENT LETTER NO. 75
Kavanagh, Gary

Response to Comment No. 75-1

This commenter supports the proposed project; the comment has been noted and will be forwarded to the decision makers for their consideration.
Comment from

First Name: Jeff
Last Name: King
Email: jeffking@kingsseafood.com
Phone: 7144320400#207
URL: 

The Wilshire Blvd. terminus for new transit provides different challenges. The Blue Line has not necessarily helped City of Long Beach. All depends on effect on SM traffic/retail/Ocean Ave, etc. Restaurants (our business/2 on Ocean) will not benefit & may magnify already poor traffic issues, especially further South. This is not the same as other areas of LA & we'd urge major input from those effected.
COMMENT LETTER NO. 76
King, Jeff

Response to Comment No. 76-1

This comment is in regards to the Westside Subway Extension Project. The proposed project involves the creation of dedicated peak-period bus lanes for the majority of the alignment, which would terminate at Centinela Avenue on the western end. Accordingly, the proposed project would not affect traffic conditions in downtown Santa Monica or Ocean Avenue, which is located approximately 2.5 miles west of the project terminus. As this comment does not state a concern or a question regarding the adequacy of the analysis in the Draft EIR, no further response is warranted. However, the comment will be forwarded to the decision makers for their review and consideration.
July 22, 2010

Martha Butler, Project Manager
LACMTA
One Gateway Plaza, Mail Stop 99-23-1
Los Angeles, CA 90012

Re: Comments on DEIR/EA for Bus Rapid Transit Project on Wilshire Blvd.

Dear Ms. Butler:

The Brentwood Community Council (“BCC”) has reviewed the Draft Environmental Impact Report (“DEIR”) for the Wilshire Bus Rapid Transit Project (“Wilshire BRT”). During the scoping period we had previously submitted a list of items that we proposed should be studied as part of this DEIR, and that scoping letter is incorporated herein by reference. At a meeting of the Board of the BCC on July 6, 2010, a Motion was unanimously passed to submit this letter in substantially this form.

We are very concerned that the team that put together the DEIR failed to study the impacts of implementing the Wilshire BRT in the Brentwood area, which is the area immediately to the north of Wilshire Blvd. between Centinela Avenue and the I-405. The map “Traffic Study Intersections” that was distributed as part of the Public Hearings for the Draft EIR/EA showed “Traffic Study Intersections” as blue dots and NONE were in Brentwood north of Wilshire. While the DEIR analysis took into account the impacts on West Los Angeles which is south of Wilshire Blvd. and west of the I-405, and it also looked at the impacts both north and south of Wilshire in the areas east of the I-405, it inexplicably did not study any of the impacts of implementing the project on Brentwood. As is noted below, an LADOT report prepared in 2005 states clearly that implementing bus lanes on Wilshire Blvd. west of the I-405 has a very significant impact on traffic on Sunset Blvd. and on other parallel neighborhood streets in between Sunset and Wilshire, so it makes no sense that these streets north of Wilshire Blvd. were not included in the DEIR study area. Why were no intersections or streets in Brentwood north of Wilshire part of the traffic study?

At a minimum, the DEIR should address the traffic impacts on Montana Avenue, San Vicente Blvd., Sunset Blvd. west of the 405 freeway, Barrington Avenue north of Wilshire and Bundy Drive north of Wilshire. It should also address the impact on the intersections in Brentwood, including Sunset/Carmelina, Sunset/Kenter, Sunset/Bundy, Sunset/Barrington Ave, Sunset/Barrington Place, Sunset/405/Church, Montana/Bundy, Montana/San Vicente, Montana/Barrington, San Vicente/Bundy, San Vicente/Gorham,
San Vicente/Barrington, San Vicente/Bringham/Federal. The DEIR is flawed, deficient, and inadequate without the inclusion of these streets and intersections in the traffic study. Why were each of these streets and intersections not part of the traffic study?

The DEIR is flawed, deficient, and inadequate because the traffic study found that the Wilshire/Bundy and Wilshire/Barrington intersections would be impacted, and yet no intersection north of Wilshire/Bundy and no intersection north of Wilshire/Barrington was included in the study in order to determine how far north there would no longer be an impact. Unless the traffic study extends to intersections that show no impact, it is not possible to determine whether the study is sufficiently extensive. Why were these intersection not studied in order to determine when the project would no longer have an impact?

The DEIR is flawed, deficient, and inadequate because it acknowledges diversion of traffic to streets south of Wilshire (Santa Monica and Olympic) and included those streets in the study, but no streets north of Wilshire and west of the 405 were included in the study. Why does it appear that an assumption was made that cars leaving Wilshire after a bus lane is added would go to parallel streets south of Wilshire, but not parallel streets north of Wilshire? If there is another explanation for studying streets south of Wilshire, but not north of Wilshire, what is that explanation?

The DEIR is flawed, deficient, and inadequate because it does not set out the respective time gained and lost for buses and cars between Centinela and Bundy, Centinela and Federal, Centinela and the 405, and Centinela and Beverly Hills. Whether or not required by LADOT traffic study methodology, these time/distance studies are necessary in order that the public and the decision-makers can accurately make a judgment about the true benefits and impacts for people movement. LADOT has the software to easily compute this information, and did not hesitate to use it when LADOT was proposing to widen Sunset between Barrington and the 405 and wanted to demonstrate how much time would be saved by driving between those two points (Barrington to the 405 on Sunset). The DEIR must include this useful, informative, and essential information for several segments along the Wilshire project, not merely end-to-end, because only then can we understand the effect of bottlenecks along the route such as at both sides of Beverly Hills. Why were before and after time comparisons for buses and cars along multiple segments of the project not included in the DEIR?

While encouraging people to use public transportation is a worthy goal, we are extremely concerned about the impact of traffic through the Brentwood area, and equally concerned about the impact of increased pollution that will result from having thousands of cars each day sit on the already gridlocked streets west of the I-405 for even longer periods than they do today. According to the DEIR, taking out 33% of the capacity of Wilshire Blvd. during peak periods will have a severe impact on traffic on Wilshire Blvd west of the I-405--- wait times at Bundy/Wilshire during peak hours would increase by over 50% and wait times at Barrington/Wilshire would increase over 20%. However, the DEIR severely understates the level of impact on Brentwood, because it fails to even study the area north of Wilshire, and as will be noted in this letter it fails to take into account the...
geography of this area or the many other projects in the area that are already being implemented which will also impact traffic and pollution.

We are submitting this letter not only as concerned residents of Brentwood, but also on behalf of the tens of thousands of workers from all across Los Angeles County who commute into Brentwood or through Brentwood to Santa Monica every weekday. As Metro and City officials are undoubtedly aware, traffic in the Westside near the I-405 and I-10 is already completely gridlocked during peak hours because these freeways are above capacity and drivers are pushed onto surface streets as they try to bypass the gridlocked freeways.

It appears that trial bus lane projects were implemented on Wilshire Blvd. between Centinela Avenue and Federal Avenue (or Barrington) in 2004 and 2006, and that both times traffic in the area became so gridlocked as a result of the bus lanes that trials were suspended after only a short time:

- A letter from LADOT from May 2005 states that trial bus lanes were in effect from March 8, 2004 to September 8, 2004 and that these lanes “caused adverse impacts and significant delays to mixed traffic on Wilshire Boulevard as well as parallel streets like Sunset Boulevard.” Furthermore, the letter states that DOT “has serious concerns regarding the impact (adverse traffic) of the bus lanes on parallel streets and the need to mitigate those impacts”.

- In November 2006, a Los Angeles Times article said that a City traffic engineer report was provided to our area’s Councilman Bill Rosendahl who read it and responded that the bus lane “has caused more gridlock than it has helped”.

Failing to include the results of these studies is a material omission from the current DEIR and a new DEIR must take the results of these studies into account, and it must address how the new bus lanes that are being proposed would come up with a different result than the previously aborted trials. Why were the statistics and conclusions of these relevant prior studies not included and discussed in the DEIR? What was the effect on the conclusions and statistics of those prior studies of the fact that parking was restricted when the bus lanes were implemented whereas parking had been previously allowed?

The BCC is not opposed to mass transit, and has previously expressed support for the Wilshire Subway extension in our area. We are open to hearing how the Wilshire BRT can reduce traffic and pollution in the area, if, in fact, that can be demonstrated. However, the DEIR provides no evidence or analysis that implementation of the Wilshire BRT would improve traffic or pollution in the area—in fact it says that it traffic would be worse. In addition:

- The DEIR provides no analysis to show whether implementing dedicated bus lanes for the Wilshire BRT would result in increased bus ridership and decreased car driving.

• It provides no analysis to show whether pollution might decrease if enough people can be encouraged to take the bus, or whether it will increase because cars will sit much longer in traffic.

• It provides no estimates of the time that might be saved by bus riders on a daily or annual basis if dedicated bus lanes are implemented in Brentwood. If little or no time is saved, it seems unlikely that additional riders will take the bus from west of the I-405 if the Wilshire BRT is implemented.

• The DEIR provides no estimates of the time lost by car drivers by losing two of the six lanes on Wilshire Blvd. in Brentwood during peak hours. People come into and through this area and Santa Monica not only from locations near Wilshire Blvd. but also from the Valley, South Bay, and many other areas. It is simply not possible for many if not most drivers to take the Wilshire bus instead of driving, and this should be taken into account in any justification of the Wilshire BRT. An analysis of the project should provide at least some estimate of how many people could take the bus instead of driving. We note that the analysis for the Wilshire subway does estimate the number of boardings at each station, so such an analysis can be done.

• The Wilshire BRT does not add bus service or increase the number of buses on Wilshire. A substantial level of bus service already exists on Wilshire Blvd., and this DEIR does not propose to add any new routes or buses. Therefore the analysis is not “buses or no buses”, but is “bus service with a dedicated bus lane” vs. “bus service without a dedicated bus lane”.

The current DEIR is simply inadequate as it addresses none of these bullet point issues set forth above, and a new DEIR must be prepared. In the alternative, what is the omitted analysis or estimate described in each of the above bullet point paragraphs? The BCC cannot support the Wilshire BRT until a DEIR is prepared that addresses the impacts on Brentwood and that demonstrates benefits to implementing the Wilshire BRT west of the I-405. What are the alleged benefits and what are those impacts?

We note that many of the improvements that are included in the Wilshire BRT DEIR can be implemented without removing two lanes of Wilshire Blvd. during peak periods. These include:

• Improving signal timing.
• Fixing curbs and repaving curbside lanes of Wilshire Blvd. where they are in disrepair. (We note that this is not a big problem on Wilshire west of the I-405.)
• Adding left turn signals and lanes.
We support the implementation of measures such as these that can improve traffic flow. Our concern is about the dedicated lanes during peak hours. A new DEIR should indicate how much improvement can be achieved if measures that do not require dedicated bus lanes are implemented, and then the additional benefit that can be achieved from adding dedicated bus lanes. As noted above, currently the DEIR does not quantify any benefits whatsoever. What are those statistics?

In addition, please note the following:

- **The geography of the areas north and south of Wilshire Blvd. west of the I-405 is different from the geography east of the I-405 and must be evaluated differently.** East of the I-405, and particularly east of Beverly Hills, Wilshire Blvd. lies in the middle of a large grid of streets that give people many alternatives to drive from point to point. However, only two streets in Brentwood, Wilshire Blvd. and Sunset Blvd., cross under or over the I-405, which means that all east-west traffic through Brentwood must merge onto one of these two streets to get past or onto the freeway. Both Wilshire and Sunset have entrance ramps onto the I-405 which means that traffic must also merge onto one of these two streets to access that freeway. Because Wilshire Blvd. is one of only two east-west streets in Brentwood that enable people to get from Brentwood to points east, the impact of decreasing the capacity of Wilshire Blvd. by 33% during peak hours is particularly severe. In addition, Wilshire Blvd. is a relatively narrow three lanes in each direction between Centinela and Federal Avenue, so the elimination of one lane during peak period has a very substantial impact. What are the impacts of the BRT on the unique nature of these Brentwood streets?

- **Streets that must be included in an impact analysis include the east-west streets of Montana Avenue, San Vicente, and Sunset Blvd. and the north-south streets of Barrington Avenue and Bundy Drive, and all the major intersections along those streets.** These streets are already gridlocked during peak hours because the I-10 and I-405 freeways are at capacity (in a recent West LA Neighborhood Council meeting, a representative from Caltrans described these freeways as “failing”) so drivers divert onto surface streets to attempt to get to their destinations. These streets are the only ones that drivers can take to get through Brentwood since other streets go only short distances. The DEIR states that the impacts on the Bundy Drive/Wilshire Blvd and Barrington Avenue/Wilshire Blvd. from the Wilshire BRT will be significant but fails to address the intersections of Barrington and Bundy at San Vicente and Montana, and at Sunset/Barrington and Sunset/Kenter Drive (Kenter is the direct extension of Bundy at Sunset). What are those impacts?

- We are aware from our work reviewing the EIRs for other projects in the area that when an intersection is shown as being “significantly impacted” that the study area should be expanded so that adjacent intersections are studied until the range of intersections that are studied are no longer significantly impacted. For this reason alone, the study area should have been expanded to the north...
to include San Vicente, Montana, and Sunset when Barrington/Wilshire and Bundy/Wilshire were found to be significantly impacted. In addition, the study area should have been expanded to the west when the intersection of Sunset Blvd/Veteran Avenue was shown to be significantly impacted. What are the impacts at these un-studied locations?

- The DEIR failed to take into account many other large projects west of the I-405, and a new DEIR must be prepared that incorporates the impacts from these projects. **Not a single project west of the I-405 was included as a “future project” in the DEIR.** The “missing” projects include:
  - **I-405 Widening and rebuilding of on ramps and off ramps at Wilshire and Sunset.** This work has already started and is scheduled to go on for at least two more years. During this time, the number of lanes on Sunset at the I-405 is reduced and construction will cause intermittent street and lane closings at Wilshire and Sunset. What are the changes throughout the DEIR that need to be made if this project is taken into account? **Clearly, no work should be done to implement a dedicated bus lane while the I-405 widening project is taking place.**

In addition, we noticed that among the improvements recommended in the DEIR is to reconfigure the eastbound left turn lane on Wilshire Blvd. at Sepulveda. However, this lane is already being reconfigured as part of the I-405 widening project, which leads us to believe that the Wilshire BRT DEIR did not take into account the new configurations of the on- and off-ramps to the I-405 when making recommendations on sidewalk reductions and lane reconfigurations on Wilshire Blvd. just west of the I-405. Therefore, recommendations on this section of Wilshire must be re-evaluated to ensure that the future configuration is taken into account, not the current configuration. What are the changes throughout the DEIR that need to be made if this is taken into account?

We note that the intersection of Sepulveda Blvd. and Wilshire Blvd. at the I-405 has the longest delay by far of any intersection in the study area except for Veteran and Wilshire immediately to the east in the AM peak period---207.8 seconds. This delay appears to be an average of both directions, and as anyone who drives through the area can tell you, the delay eastbound toward Sepulveda during PM peak is significantly longer.

- **Two of the four corners of Barrington and Wilshire are currently vacant.** A large project is already in the works for the northeast corner, and we are waiting to hear what is going to be proposed for the southeast corner. What are the changes throughout the DEIR that need to be made if the project with entitlements on the NE corner (including the City’s approval of the closure of a lane on Wilshire during the 3 year construction period) is taken into account?
The Bundy Village EIR (proposed for the corner of Bundy Drive and Olympic Blvd.) states that that project would significantly impact traffic at the intersections of San Vicente Blvd/Barrington Avenue and Barrington/Wilshire. If a project that is at Bundy/Olympic Blvd. is shown to impact traffic at San Vicente Blvd. and Barrington (2.3 miles away), of course a project such as the Wilshire BRT that substantially reduces capacity on Wilshire Blvd. is likely to have an impact on streets such as Montana Avenue (0.6 miles north of Wilshire at Bundy), San Vicente Blvd. (0.8 miles), and Sunset Blvd (1.3 miles). Why is there such an inconsistency between the EIRs and the traffic studies?

We note that the left turn mitigation proposed for Barrington and Wilshire in this DEIR is the same one that is proposed in the Bundy Village FEIR, and question how many times the City can give credit for the same recommendation. How many projects may claim the same mitigation?

We have been told that a project is pending for the southeast corner of Bundy and Wilshire.

Centinela Avenue is the eastern border of Santa Monica, and many large projects are proposed in Santa Monica just west of Centinela.

The “Casden project” (Sepulveda and Pico) was not included even though Sepulveda/Pico, Westwood/Pico, and Overland/Pico are all listed as significantly impacted intersections from the Wilshire BRT.

Metro Westside Subway Extension- While the extension of the subway will not reach Brentwood for many years, it will impact the points further east much sooner. It is likely that lanes on Wilshire will be reduced during the construction phase, and this should definitely be taken into account in any analysis of the Wilshire BRT.

Why were each of these projects not included in the BRT DEIR? And what are the changes throughout the DEIR that need to be made if they are included?

The DEIR should consider an Alternative to the project that excludes Wilshire Blvd. west of the 405. Under Alternative A, which appears to be the recommended alternative, the Brentwood section of the Wilshire BRT would not be contiguous with the rest of the Wilshire BRT because no bus lanes would exist east of the I-405 to avoid interference with freeway access. The DEIR should demonstrate that benefits exist to adding the 1.5 miles in Brentwood vs. having a Wilshire BRT that does not extend west of the I-405. We do not consider a “benefit” to be that having a longer Wilshire BRT entitles the City to a higher level of Federal funding, given the large potential negative impact of the project on Brentwood. What are the changes that need to be made in the DEIR if the
project excludes Wilshire west of the 405? And the same question if the project excludes Wilshire west of Federal?

- The DEIR should investigate making the WBRT westbound-only in the morning peak hours and eastbound-only in the evening peak hours. This reflects the traffic patterns into and out of the area. There is no reason to have the bus lanes in both directions as the traffic in the opposite direction moves satisfactorily on all lanes, including the curb lane. What are the changes that need to be made throughout the DEIR if this single direction alternative is included?

- The DEIR should include a time delay traffic study so that everyone can understand how much longer it will take to drive through the area. This study should show the time for different sections of the proposed DEIR not only from end to end. What are the before and after time comparisons over different segments of the project?

- We are very concerned about the sidewalk reductions that are proposed, and ask that they be reviewed again in a new DEIR. What are the factors, if any, that lessen our following concerns? If there are no such factors, why shouldn’t the BRT project be revised?

- Federal Avenue to I-405 (adjacent to VA). The DEIR proposes widening Wilshire Blvd. from Federal Avenue east to the I-405 by reducing the sidewalk width on the south side of the street. This section of Wilshire Blvd. is very difficult for pedestrians and bicyclists as it is, and narrowing the sidewalk will make the area impossible to navigate for anyone who is not in a motor vehicle. Just as Wilshire is one of only a few streets to go under the I-405 for cars, it is one of the only streets that cyclists and pedestrians can use to cross the I-405.

  o Pedestrian access on Wilshire near the VA is already restricted because the VA has a fence that stops people from leaving the sidewalk.

  o The westernmost stop of Phase 1 of the Wilshire Subway is just south of Wilshire on the VA property, and reducing the sidewalk limits pedestrian access to the subway and makes it dangerous for large numbers of people to walk on Wilshire to get to the subway.

  o Bicyclists often ride on the sidewalk in both directions on the south side because Wilshire Blvd. is such a difficult street on which to cycle. Eliminating the sidewalk will prevent cyclists from accessing the sidewalk, especially since pedestrians will be forced to use a narrower space as well. While the DEIR proposes that cyclists be allowed to access the bus lane during peak periods, this does nothing to help cyclists during non-peak periods. We believe that any reconfiguration of the street should add a bicycle lane that would enable cyclists to ride the streets instead of the sidewalks on that section of Wilshire at
all times of day, not just during peak hours. We note that many cyclists in the area are students going to UCLA and to University High School, so are riding outside of peak periods.

- In addition, the DEIR should address any improvements on bus speeds in light of the fact that buses will be sharing lanes with bicyclists which is likely to slow down average bus speeds.

- Wilshire between Federal and Barrington. The DEIR’s recommendation to widen the street in this location ignores the dozens and dozens of University High School students that wait at the bus stop on the south side of this block after school. If the sidewalk width is reduced, they will be pushed into the street or into the parking lot of the nearby 7-11, dangerous locations for students to wait. It should be noted that these students are not waiting during the afternoon peak period, so would not benefit from the proposed bus lane. Why must the sidewalk width be reduced? Why doesn’t the DEIR consider these impacts of reducing the sidewalk width?

- The DEIR fails to review the results of the trial bus lanes on Wilshire in 2004 and 2006. Certainly if the trial was implemented in order to test the value of a bus lane vs. its impact on the surrounding area, the results of those studies must be included in any analysis that proposes re-introducing it. Failure to do so is a material omission in the DEIR. What were those results?

- The needs of businesses on Wilshire Blvd. were ignored in the DEIR. When the trial was underway, businesses on Wilshire protested that they lost business through lack of access and parking spaces. When the results of the trial bus lane are included in a DEIR, these business concerns should also be addressed. Impact on these businesses would be worse under the proposed Wilshire BRT than during the 2006 trial because in 2006 the bus lanes were limited to one direction only (eastbound or westbound) during peak hours, while the new DEIR proposes to have them in both directions during each set of peak hours. What would be the financial impact on Wilshire businesses?

- We notice that the DEIR summarized nearly 1,000 comments that were submitted during the scoping process into a carefully designed summary matrix in order to illustrate what comments each person and organization made, but excluded 24 comments because they were written in Korean. While these comments probably do not impact our area, we find it unacceptable that the City of Los Angeles proposes a major project through the heart of Koreatown, spends what is undoubtedly a large sum of money to prepare a DEIR, yet fails to locate a single Korean-speaking person who can translate 24 comment cards so that these people who took the time to submit written comments can have their opinions included. This sloppy approach is indicative of the DEIR in general. What is the translation of the comments written in Korean?
We respectfully request that answers to our comments and questions be covered in a new DEIR for the Wilshire BRT project so that we and the decision-makers can have the necessary information to assess its impact on our area.

Please include the Brentwood Community Council on the mailing list for future notices pertaining to this project. Please include this letter in the file.

Thank you.

Sincerely,

Raymond Klein

Raymond Klein, Chair
Brentwood Community Council

cc: Councilman Bill Rosendahl
COMMENT LETTER NO. 77
Klein, Raymond, Chair
Brentwood Community Council

Response to Comment No. 77-1

Please refer to Master Response No. 1 for an explanation of how the study intersections were identified. The LADOT document referred to in the comment discusses the 2004 demonstration project. Please refer to Master Response No. 4 for an explanation of the differences between the demonstration project and the proposed project.

Response to Comment No. 77-2

Please refer to Master Response No. 1 for an explanation of how the study intersections were identified. The commenter may be referring to a traffic study for a development project in which the new trips generated by a project are manually added to each intersection. In such a case, if the analysis identified impacts at the far limits of a predetermined study area, it may be appropriate to expand the study area further. However, for the proposed project, the study area was determined using the regional travel demand model, and the extent of the potential impacts were identified using conservative, initial model runs, as described in Master Response No. 1. Thus, the argument for extending the study area does not apply to the methodology used for this project.

Response to Comment No. 77-3

Please refer to Master Response No. 1 for an explanation of how the study intersections were identified. As explained in the response, the study area was not based on assumptions but on the results of the regional travel demand model.

Response to Comment No. 77-4

The Draft EIR/EA and the TIA disclose the increase in vehicle delay at the study intersections on Wilshire Boulevard and in the rest of the study area. The analysis of project impacts is consistent with LACMTA and City of Los Angeles guidelines and the CEQA guidelines. While data of the kind requested may be of interest to the commenter in forming an opinion on the proposed project, it is not necessary for evaluating potential project impacts under CEQA or NEPA.

Response to Comment No. 77-5

Please refer to Master Response No. 1 for an explanation of how the study intersections were identified, Master Response No. 2 for an explanation of how lane utilization was determined, and Master Response No. 2 for an explanation of the development of future traffic forecasts and the inclusion of development projects.
Response to Comment No. 77-6

Comment noted.

Response to Comment No. 77-7

Please refer to Master Response No. 4 regarding the differences between the proposed project and the Bus Lane Demonstration Project.

Response to Comment No. 77-8

Please refer to Master Response No. 4 regarding the differences between the proposed project and the Bus Lane Demonstration Project.

Response to Comment No. 77-9

Please refer to Master Response No. 10 regarding the anticipated shift of riders from automobiles to public transit. When more people choose public transit as a viable option to the automobile, it helps relieve some of the traffic congestion and helps reduce air pollution.

Response to Comment No. 77-10

Under CEQA, the Draft EIR/EA is not required to “show whether pollution might decrease if enough people can be encouraged to take the bus...” Air quality impacts were evaluated in the Draft EIR/EA consistent with SCAQMD prescribed evaluation criteria. Impacts were found to be less than significant.

Response to Comment No. 77-11

The Metro Rapid Line 720 can take up to 5 minutes in the a.m. peak and 12 minutes in the p.m. peak to travel from Bonsall Avenue to Bundy Avenue. It is expected that a savings of at least 1.5 to 3 minutes in bus travel times in each direction for this segment can be achieved. All these cumulative savings along the corridor are essential in making significant improvements in passenger travel times and service reliability, two key goals of the proposed project.

Response to Comment No. 77-12

The Draft EIR/EA and the TIA disclose the increase in vehicle delay at the study intersections on Wilshire Boulevard and in the rest of the study area. The analysis of project impacts is consistent with LACMTA and City of Los Angeles guidelines and the CEQA guidelines. While data of the kind requested may be of interest to the commenter in forming an opinion on the proposed project, it is not necessary for evaluating potential project impacts under CEQA or NEPA.

The trips generated by the identified commuters were captured in the traffic counts used to analyze the traffic impacts of the proposed project at the intersections.
Response to Comment No. 77-13

Buses are scheduled on every corridor, including Wilshire Boulevard, to meet passenger demand. The implementation of bus lanes on Wilshire Boulevard would not only help reduce passenger travel times but most importantly, the improved travel times would remain relatively constant over time due to the separation of the bus lanes from mixed-flow traffic. Therefore, service reliability is greatly improved. These improved travel times and consistencies would allow for improved operating efficiency and the ability to provide more trips without the need to increase the existing fleet size.

Response to Comment No. 77-14

Please refer to Response to Comment Nos. 77-9 through 77-13 above. Also, please refer to Master Response No. 1 for an explanation of how the study intersections were identified. As explained in the response, the study area was not based on assumptions but on the results of the regional travel demand model.

Response to Comment No. 77-15

We recognize that many of the improvements included in the Wilshire BRT Draft EIR/EA can be implemented without removing two lanes of Wilshire Boulevard during peak periods; however, it is the implementation of bus lanes along Wilshire Boulevard that would provide the greatest benefit to transit and encourage more riders.

Please refer to Response to Comment No. 17-21 for further discussion of the City’s transportation systems management. LADOT has long recognized the benefits of transportation systems management, and has made major commitment to the continuing development and improvement of the City’s transportation infrastructure and networks, by modifying traffic signal timing and adding left-turn lanes/phases where warranted, and investing in new technologies. However, these measures alone cannot and will not ensure a sustainable long-term transportation infrastructure or adequately address future traffic ambient growth in the City because motor vehicles trips will continue to grow. Therefore, a viable long-term transportation management system must include an efficient and reliable transit infrastructures that is capable of moving high volumes of people, not just automobiles. Unfortunately, land-use, right-of-way, and financial constraints often make the goal of constructing new transit facilities, outside of the existing transportation infrastructure, feasible. In those instances, transit facility, such as the proposed project, must share the City’s limited transportation resources with other modes.

Response to Comment No. 77-16

Please refer to Response to Comment No. 77-15 above.
Response to Comment No. 77-17

As discussed on page 25 of the TIA, the lanes on Wilshire Boulevard are not equally utilized, so restricting the curb lane to buses and right-turning vehicles does not reduce the capacity of Wilshire Boulevard by 33%. Please refer to Master Response No. 2 for an explanation of how lane utilization was determined. Wilshire Boulevard is generally 75 feet from curb to curb between Centinela and Federal Avenues. In the eastern segment of the proposed project, Wilshire Boulevard is as narrow as 70 feet, so the potential impacts in Brentwood are not being treated differently from other segments of the proposed project. The proposed project includes widening of Wilshire Boulevard between Barrington Avenue and Bonsall Avenue to create a new eastbound bus lane. This additional capacity would improve traffic flow on Wilshire Boulevard approaching the I-405. The proposed project would lengthen the left-turn pocket on Wilshire Boulevard at Sepulveda Boulevard for traffic making a left-turn from eastbound Wilshire Boulevard to northbound Sepulveda Boulevard. Currently, that traffic often spills over onto the adjoining through lanes. By eliminating this spillover from the left-turn pocket, the proposed project would improve eastbound traffic flow on the Wilshire Boulevard approach under the I-405 bridge.

Response to Comment No. 77-18

Please refer to Master Response No. 1 for an explanation of how the study intersections were identified.

Response to Comment No. 77-19

Please refer to Response to Comment No. 77-2 above.

Response to Comment No. 77-20

Please refer to Master Response No. 3 for an explanation of the development of future traffic forecasts and the inclusion of development projects.

Response to Comment No. 77-21

LACMTA staff have coordinated with the staff working on the I-405 widening project to make sure that the two projects do not conflict or overlap with one another. The majority of the I-405 work is being conducted on the freeway and on/off ramps. It does not include lengthening the eastbound left-turn pocket at Sepulveda Boulevard.

Response to Comment No. 77-22

Please refer to Response to Comment No. 77-21 above.

Response to Comment No. 77-23

The delay reported for each intersection is the average delay experienced by all vehicles traveling through the intersection, whether on the major street,
the minor street, proceeding straight through, or turning. The delay includes not just stopped time but reduced speed caused by decelerating to stop and then accelerating after a stop.

**Response to Comment No. 77-24**

The Draft EIR/EA and the TIA included expected development in the region through 2020. Please refer to Master Response No. 3 for an explanation of the development of future traffic forecasts and the inclusion of development projects.

**Response to Comment No. 77-25**

There is no inconsistency between the EIRs. The Bundy Village Project is a development project that creates new automobile trips. The proposed project is a transit project that causes a redistribution of trips. The Draft EIR/EA and the TIA analyze the potential impacts of this redistribution. Please refer to Master Response No. 3 for an explanation of the development of future traffic forecasts and the inclusion of development projects.

The environmental clearance process is currently underway for the Westside Subway Extension Project. According to the schedule in the Expenditure Plan for Measure R and subsequently adopted into the Long Range Transportation Plan for Los Angeles County, the funding for the subway would allow it to be built to Fairfax area in 2019, Century City in 2026, and reach Westwood in 2036. The Wilshire BRT provides an earlier opportunity to improve transit service along this heaviest travelled bus corridor, while also improving the roadway. Whenever the subway is opened, bus service would continue to run along Wilshire Boulevard as it does now along other corridors, where rail is operating. Certainly many transit riders will continue to take the bus to connect to areas located between rail stations. It is too speculative to predict how bus service might be restructured along Wilshire Boulevard with the subway, but it is reasonable to assume that this corridor would continue to have high auto and passenger demand.

**Response to Comment No. 77-26**

The planning effort for a project includes a process known as public scoping. It is during this time that the public is asked to present ideas and concerns that should be taken into consideration as the plan is initiated, including other alternatives. In the fall of 2009, a 30-day public scoping period was held, including four public scoping meetings for the Wilshire BRT Project. It was during this time that any other alternatives to be evaluated should have been raised.

Also, please refer to Master Response No. 8 regarding the exclusion of the segment between Comstock Avenue and Veteran Avenue from the proposed project.
Response to Comment No. 77-27

Please refer to Response to Comment No. 77-26 above.

Response to Comment No. 77-28

Any other alternative to be evaluated should have been raised during the public scoping period for the Wilshire BRT Project in Fall 2009. However, the Wilshire BRT corridor extends over approximately 10 miles of Wilshire Boulevard from the Los Angeles/Santa Monica City limits to downtown Los Angeles. Commute and travel patterns are different throughout the corridor. While it may be true that employment trips are more heavily westbound in the morning and eastbound in the evening in some areas, the opposite is true in other areas. Downtown Los Angeles is also a major trip destination, and morning eastbound and evening westbound traffic volumes are heavy at many locations throughout the corridor. The Wilshire Bus Speed Improvement – Stage Two Analysis Memorandum (Transportation Management & Design, Inc, February 2007) cited in Master Response No. 8, documented bus delays in both directions at intersections on Wilshire Boulevard during both the morning and evening peak periods, including westbound delay at both Beverly Glen Boulevard and Gayley Avenue during both peak periods. Two goals of the proposed project are to improve bus travel times and to improve service reliability. Implementing the project in both directions is critical to achieving these goals. Bus travel time and reliability would be improved by reducing the variability in travel time caused by delays at signalized intersections in both directions. In addition, bus speed data indicate that bus speeds between Comstock Avenue and Westwood Boulevard are as low as 17 mph in the eastbound p.m. peak direction and as low as 8.2 mph in the westbound p.m. peak direction. These bus speeds for both directions are well below the posted speed limit of 35 mph.

Response to Comment No. 77-29

The Draft EIR/EA and the TIA provide data about significant impacts at intersections, in accordance with the CEQA guidelines. While data of the kind requested in the comment may be of interest to the commenter in forming an opinion on the proposed project, it is not necessary for evaluating potential project impacts under CEQA or NEPA.

Response to Comment No. 77-30

Currently, curb widths range between 10 feet to 15 feet between Bonsall Avenue and Federal Avenue, which is within the County of Los Angeles’ jurisdiction. Sidewalks widths would be reduced to a more uniform width of 10 feet in order to widen Wilshire Boulevard and accommodate a new eastbound bus lane. Please refer to Response to Comment No. 35-6 for further discussion regarding sidewalk widths.
Response to Comment No. 77-31

Please refer to Response to Comment No. 77-30 above.

Response to Comment No. 77-32

Please refer to Master Response No. 4 regarding the differences between the proposed project and the Bus Lane Demonstration Project. The Bus Lane Demonstration Project was discontinued until the bus lanes could be incorporated into a larger project.

Response to Comment No. 77-33

Please refer to Master Response No. 4 regarding the differences between the proposed project and the Bus Lane Demonstration Project.

Response to Comment No. 77-34

The 24 comments that were written in Korean were part of the BRU petition supporting the proposed project. Translations were inadvertently omitted, and the summary matrix included in Appendix A has since been updated to include these comments of support.

Response to Comment No. 77-35

Responses to the commenter’s comments and questions did not identify new impacts or change the conclusions presented in the Draft EIR/EA. According to Section 15088.5 of the State CEQA Guidelines, recirculation of a Draft EIR is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. Therefore, a recirculation or a new Draft EIR is not warranted or required.

Response to Comment No. 77-36

Comment noted; the Brentwood Community Council has been added to the project’s database for receiving future notices pertaining to this project.
<table>
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<tr>
<th>Fname</th>
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<tbody>
<tr>
<td>Raymond</td>
<td>Klein</td>
<td></td>
<td><a href="mailto:rklein@earthlink.net">rklein@earthlink.net</a></td>
</tr>
</tbody>
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**Date**  
Jul 3, 2010

**Format**  
email

**File Name**  
klein.raymond.070310

**Summary**  
Seeking additional information regarding the study.

**Comment**
The Memo, dated May 13, 2005, from LADOT to City Council said:"DOT is currently collecting extensive traffic data at several intersections along Wilshire Boulevard and other parallel arterial streets like Sunset Boulevard and Santa Monica Boulevard to assist an extensive analysis of impacts caused by the Wilshire Boulevard bus lanes."  
WHERE CAN THAT DATA BE OBTAINED?  
Prior to the one mile Wilshire demonstration project, was there restricted parking on the north side of Wilshire from 4pm to 7pm?
COMMENT LETTER NO. 78
Klein, Raymond

Response to Comment No. 78-1

The data collected during the demonstration study was analyzed and summarized in the LADOT report to the Los Angeles City Council dated November 7, 2005. A copy of the report is available at the City Clerk's Office.

Parking was permitted during peak periods on the north side of Wilshire Boulevard between Barrington Avenue and Centinela Avenue, except at certain locations where there were 15-minute parking zones. However, there was no parking or stopping allowed at any time, on either side of Wilshire Boulevard between Federal Avenue and Barrington Avenue.
July 26, 2010

Ms. Martha Butler
Metro
One Gateway Plaza, 99-23-1
Los Angeles, CA 90012

Dear Ms. Butler:

I am grateful for this opportunity to comment on the Draft EIR/EA for the Wilshire Bus Rapid Transit Project. I would like to thank the Metro project staff along with staff from the L.A. Department of Transportation for their hard work and their responsiveness to the community and to my office. I truly respect the efforts over the past decade of our transportation planners to address the needs of commuters on this the busiest transit corridor in the nation. I firmly believe that the most important transit solution for this corridor will be the Westside Subway Extension.

In the interim, I question whether this Federal and local project investment will bring a sufficiently significant increase in ridership on local transit to validate this project. Metro planners deserve credit for the addition ten years ago of the Metro Rapid program along the Wilshire corridor, for that has yielded substantial ridership increases. Many of the new Metro Rapid riders were commuters who made the decision to leave their vehicles behind in favor of the commute by bus. I have concerns about the ridership projections in the draft EIR/EA for Wilshire BRT project, and would question if the increased speed of bus travel will actually create a compelling case for substantially more commuters to leave their vehicles at home and commute instead by bus. I am hesitant to support this project if it does not result in very substantial ridership increases and benefits to all residents and commuters along the Wilshire corridor in my district.

I recognize that despite my hesitations, many of my colleagues on the City Council, as well as members of Board of Supervisors and Metro, have seen many merits to this project and would be...
inclined to support it. That being said, if much of the project is supported I would like to take the
time to raise some other concerns and make some alternative recommendations.

While reviewing the draft document I felt that inadequate attention was given to the unique
character of the Wilshire-Westwood Scenic Corridor also known as “condo canyon” between
Comstock Ave. and Malcolm Ave. Unlike most of the rest of the Wilshire BRT corridor which is
primarily commercial, this part of the corridor is primarily inhabited by large residential high-rise
condominium buildings. Many of these residents are seniors. Many of these complexes have
driveways with ingress and egress to and from Wilshire Blvd. There are substantial concerns about
the ability of residents to gain ingress and egress from these complexes through the peak hour lane.

I request that the segment between Comstock Ave. to Malcolm Ave. be removed from the project.
This would address many of the concerns raised by residents along this segment of the project
corridor. We have reviewed data regarding existing bus speeds and the post-project speed
projections. It shows that currently, there are substantial traffic delays in the segment between
Comstock and Westwood. Unfortunately, because this is such a long segment it is difficult to
identify from this data where the greatest slowing of traffic currently occurs. As a life-long
Westside resident I have observed that the greatest impact takes place as westbound traffic
approaches the Westwood Village area, especially during evening peak hours. For the eastbound
lanes it appears that the greatest impact takes place where traffic crosses Comstock approaching the
City of Beverly Hills. A number of residents along this portion of the corridor and the adjacent
neighborhoods have also made similar observations. I understand that the current draft document
does not include this alternative of removing this segment from the project, but I would urge the
project management team to seriously consider this important option.

If however this is not an option for the project at this time, I would strongly urge the decision
makers to support Alternative A, the truncated project without jut-out removal. The jut-outs are
located between Comstock Ave. and Malcolm Ave. I also wish to thank staff at the Department of
Transportation, Bureau of Street Services and Metro for including an additional 1.8 miles of curb
lane reconstruction and resurfacing within my district which will be funded from cost savings due to
the retention of the jut-outs as part of Alternative A. These sections of the project area are clearly in
need of reconstruction and resurfacing because they are already in very poor condition primarily
due to wear and tear from Metro buses.

I fully recognize that Alternative A will allow for only two peak-hour mixed flow lanes in each
direction instead of three, but the cost to this community with the removal of the jut-outs is far
greater than the benefits of the extra lanes. One of my greatest concerns is the loss of parking in
front of the many large condominium buildings - that parking is needed, for it is in constant use by
movers, delivery and various other service vehicles. The on-site parking cannot adequately serve
the needs of many of these complexes.
The original plan would necessitate the removal of about one hundred trees and the loss of a landscaped green belt throughout much of this segment of the project. If anything, bus traffic—and regular vehicle travel during off-peak hours—would now be too close for comfort to the many large residential complexes, hotels, churches and synagogues along this portion of the corridor—the close proximity would likely worsen noise and vibration disturbances. The charm of this primarily residential segment would be harmed in order to create a wide commuter expressway.

I also feel the need to focus on the impacts of the removal of traffic lanes from regular vehicular traffic during peak traffic hours. I recognize that LADOT and Metro have worked very hard over the past year to mitigate many of the intersections in which the study has identified traffic impacts. Nevertheless, the fact remains that nine intersections have been identified for which adequate mitigation measures cannot be found. We must recognize that the addition of this peak hour project will worsen traffic at already clogged intersections, the majority of which are in my district. I am concerned about the project impact upon evening peak hour traffic, particularly regarding westbound movement along Santa Monica Blvd. as it crosses already busy intersections at Beverly Glen, Overland, Westwood and Veteran, and where westbound traffic on Olympic crosses Westwood. The westbound aspects of these key segments include intersections with impacts from the project that cannot be mitigated. Perhaps the removal of the portion of the project between Comstock and Malcolm could alleviate some of this pressure.

I also believe that the environmental document does not adequately analyze the impact of driver behavior for those motorists looking to get away from increased congestion. The increased delay along westbound Santa Monica Blvd. will likely cause more drivers to cut-through residential neighborhoods to find a path of less resistance. The same situation may occur as drivers heading westbound on Wilshire Blvd. from Beverly Hills during evening peak hours suffer a negative impact from the loss of the third traffic lane as they enter the City of Los Angeles. This may force drivers to look for other alternatives for neighborhood cut-through options such as Comstock Avenue just west of the Los Angeles Country Club. A similar condition may occur for southbound traffic on Fairfax Ave. approaching Wilshire Blvd. I suspect that we will see an increase of drivers who will look to cut-through to go westbound on 6th St. and other adjacent streets. We may not adequately understand the impacts of these changes to traffic patterns upon neighborhood quality of life until the project has been put in place.

I am looking forward to your response to my comments and those of our constituents who share many of the same concerns. My staff and I remain available to discuss these issues as you move forward with this process.

Sincerely,

[Signature]

[Name]
Councilmember, 5th District
COMMENT LETTER NO. 79
Koretz, Paul, Councilmember
City of Los Angeles Council District 5

Response to Comment No. 79-1

Comment noted. As this comment does not state a concern or a question regarding the adequacy of the analysis in the Draft EIR, no further response is warranted. However, the comment will be forwarded to the decision makers for their review and consideration.

Response to Comment No. 79-2

Please refer to Master Response No. 10 regarding the anticipated shift of riders from automobiles to public transit.

Response to Comment No. 79-3

Comment noted. Please refer to Response to Comment Nos. 79-4 through 79-10 below.

Response to Comment No. 79-4

Please refer to Master Response No. 5 concerning access to residential buildings along Wilshire Boulevard between Comstock Avenue and Malcolm Avenue.

Response to Comment No. 79-5

Please refer to Master Response No. 8 regarding the exclusion of the segment between Comstock Avenue and Veteran Avenue from the proposed project.

Response to Comment No. 79-6

In consideration of comments received during the public review of the Draft EIR/EA, LACMTA and LADOT are considering Alternative A (Truncated Project Without Jut-Out Removal) as the preferred alternative. Accordingly, LACMTA and LADOT staff are recommending adoption of this alternative to the LACMTA Board, the Los Angeles City Council, and the Los Angeles County Board of Supervisors. This alternative would result in the retention of the jut-outs between Comstock Avenue and Malcolm Avenue.

Response to Comment No. 79-7

As discussed in Response to Comment No. 79-6 above, LACMTA and LADOT are considering Alternative A as the preferred alternative. This alternative would result in the retention of the jut-outs between Comstock Avenue and Malcolm Avenue. Accordingly, no changes to on-street parking would occur. Please refer to Master Response No. 6 concerning removal of on-street parking.
Response to Comment No. 79-8

Please refer to Master Response No. 11 regarding removal of street trees. In addition, this alternative would retain the buffer between Wilshire Boulevard and the properties that line this major transportation corridor.

Response to Comment No. 79-9

Please refer to Master Response No. 8 regarding the exclusion of the segment between Comstock Avenue and Veteran Avenue from the proposed project.

Response to Comment No. 79-10

Please refer to Master Response No. 16 regarding traffic flow from Beverly Hills and Master Response No. 1 for an explanation of how the study intersections were identified. Six intersections on 6th Street between Fairfax Avenue and Alvarado Street are included in the traffic analysis. Southbound traffic on Fairfax Avenue is unlikely to use 6th Street and adjacent streets to travel westbound because these smaller streets all terminate at San Vicente Boulevard.
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Martha Butler, Project Manager
LACMTA
One Gateway Plaza, Mail Stop 99-23-1
Los Angeles, CA 90012

Re: Comments on DEIR/EA for Bus Rapid Transit Project on Wilshire Blvd.

July 13, 2010

Dear Ms. Butler:

We are writing on behalf of the South Brentwood Residents Association (SBRA). SBRA represents approximately 3,000 homeowners and renters who reside in the area south of San Vicente Blvd., north of Wilshire Blvd., east of Centinela Avenue and west of Federal Avenue. Additionally, SBRA represents the interests of all residents living in multi-family dwellings throughout the Brentwood community. Because the SBRA covers homes immediately north of Wilshire Blvd. between Centinela and Federal, the route of the proposed Wilshire BRT runs through our area.

We are very concerned that the team that put together the DEIR failed to study the impacts of implementing the Wilshire BRT in the Brentwood area, and we request that a new DEIR be prepared that covers South Brentwood. At a minimum the DEIR should address the traffic impacts on Montana Avenue, San Vicente Blvd., Sunset Blvd. west of the 405 freeway, Barrington Avenue north of Wilshire and Bundy/Kenter Drive north of Wilshire. It should also address the impact on any other intersections that will be significantly impacted, and the proposed mitigations.

We have reviewed the letter prepared by the Brentwood Community Council and agree with its issues and recommendations. In particular:

1. We are concerned that trial bus lane projects that were previously conducted in 2004 and 2006 in our area led to gridlock, and that has not been addressed in the DEIR. Metro should include the results of these trials in the DEIR and should explain how it proposes to mitigate the impacts of traffic this time if the DEIR is implemented.

2. We believe that the DEIR should include data on:
   a) the improved speed of buses in the area west of the 405;
   b) projections on how many more people will be encouraged to take the bus as a result of implementing dedicated bus lanes and what the total ridership in our area is projected to be with and without the bus lane;
   c) the increased travel time for cars during peak hours when the bus lanes are in place and the number of drivers impacted,
   d) air pollution impacts from having cars sit in traffic longer vs. reductions from encouraging more people to take the bus.
We note that the DEIR should address these data points for the area west of the 405 separately than for the rest of the bus lane since our area is not contiguous to the rest of the bus lane in Alternative A which appears to be the preferred Alternative.

3. We ask that the project review the impact of implementing bus lanes only in the westbound direction in the AM peak and the eastbound direction in PM peak as this reflects the traffic patterns in the area, and bus lanes in both directions are not necessary.

4. We ask that the concerns raised by business owners on Wilshire Blvd. during previous bus lane trials and be addressed as well.

5. We are fully supportive of the proposals to improve signal timing, to add a left turn lane at Barrington, and to lengthen the left turn lane eastbound at Sepulveda (although we believe that this last change is already being implemented during the 405 freeway widening), and to fix curbs and pave streets. We would like to know how many of the benefits can be realized from these changes alone and without adding in dedicated bus lanes in our area.
- We ask that **No Wilshire BRT be implemented until after the 405 freeway widening project is completed**, as that project is already causing many disruptions at Wilshire Blvd. and Sunset Blvd. Any recommendations in the DEIR should take into account the changes being made to the freeway on/off ramps at Wilshire and Sunset.

- We ask that Metro review its recommendation to decrease the sidewalk width between Barrington and Federal in light of the large number of University High School students who take the bus from Barrington (which we note is earlier than 4 pm in the afternoon so that they will not benefit from this project.)

- We ask that The DEIR to take into account many other large projects west of the I-405, and a new DEIR be prepared that incorporates the impacts from these projects:
  - Two of the four corners of Barrington and Wilshire are currently vacant. A large project is already in the works for the northeast corner, and we are waiting to hear what is going to be proposed for the southeast corner;
  - The Bundy Village EIR (proposed for the corner of Bundy Drive and Olympic Blvd.) We note that the left turn mitigation proposed for Barrington and Wilshire in this DEIR is the same one that is proposed in the Bundy Village FEIR, and question how many times the City can give credit for the same recommendation.
  - We understand that a project is pending for the southeast corner of Bundy and Wilshire.
  - Centinela Avenue is the eastern border of Santa Monica, and many large projects are proposed in Santa Monica just west of Centinela.
  - The “Casden project” (Sepulveda and Pico) was not included even though Sepulveda/Pico, Westwood/Pico, and Overland/Pico are all listed as significantly impacted intersections from the Wilshire BRT.
  - Metro Westside Subway Extension- While the extension of the subway will not reach Brentwood for many years, it will impact the points further east much sooner. It is likely that lanes on Wilshire will be reduced during the construction phase, and this should definitely be taken into account in any analysis of the Wilshire BRT.

- We ask Metro to review the possibility of putting in dedicated **bicycle lanes** on Wilshire Blvd. from Federal Avenue through Westwood which could be accessed at all times not only during peak hours. We are concerned that decreasing sidewalk widths without adding bike lanes will make it even harder for bicyclists to bike under the 405. Asking bicycles to share bus lanes does not provide a reasonable alternative because they can only be used during peak hours, and bicyclists will slow down the buses and eliminate a lot of the proposed benefit of this project.

Thank you for addressing our concerns. SBRA would like to make sure that any projects that are proposed appropriately weigh the potential benefits against the potential negative impacts on what is already a gridlocked area. The current DEIR is inadequate as it addresses neither the benefits nor the issues of concern in our area that would be caused by the Wilshire BRT. SBRA cannot support the Wilshire BRT until a DEIR is prepared that addresses the impacts on Brentwood and that demonstrates the benefits of implementing the Wilshire BRT west of the 405.

Marylin Krell

Marylin Krell, President SBRA
COMMENT LETTER NO. 80  
Krell, Marylin, President  
South Brentwood Residents Association

Response to Comment No. 80-1

Comment noted. As this comment does not state a concern or a question regarding the adequacy of the analysis in the Draft EIR, no further response is warranted. However, the comment will be forwarded to the decision makers for their review and consideration.

Response to Comment No. 80-2

Please refer to Master Response No. 1 for an explanation of how the study intersections were identified.

Response to Comment No. 80-3

The letter prepared by the Brentwood Community Council is included as Letter 77. Please refer to Response to Comment Nos. 77-1 through 77-35.

Response to Comment No. 80-4

Please refer to Master Response No. 4 regarding the differences between the proposed project and the Bus Lane Demonstration Project.

Response to Comment No. 80-5

Please refer to Master Response No. 10 regarding the anticipated shift of riders from automobiles to public transit.

Response to Comment No. 80-6

The bus lanes would improve bus travel times and service reliability in both directions. However, between Bonsall Avenue and Federal Avenue, only an eastbound bus lane is proposed.

There is also a planning process that includes a public scoping period, in which the public is asked to present ideas and concerns that should be taken into consideration as the plan is initiated, including other alternatives. In the fall of 2009, there was a 30-day public scoping period that included four public scoping meetings for the Wilshire BRT Project. Unfortunately, it was during this time that any other alternatives to be evaluated as part of the Draft EIR/EA should have been raised.

Response to Comment No. 80-7

The concerns raised by business owners on Wilshire Boulevard during the previous bus lane trial had to do with the elimination of parking in front of their businesses. When the bus lane trial was discontinued, parking along
this segment of Wilshire Boulevard was never restored and are currently being used for mixed-flow traffic.

Response to Comment No. 80-8

LACMTA staff have spoken with and will continue to coordinate with those working on the I-405 freeway HOV project. The extension of the eastbound left-turn pocket onto northbound Sepulveda Boulevard is not part of that project.

Response to Comment No. 80-9

LACMTA staff will continue to coordinate with those working on the I-405 freeway HOV project to minimize any impacts from the two projects.

Response to Comment No. 80-10

Please refer to Response to Comment No. 35-6 regarding sidewalk widths.

Response to Comment No. 80-11

Please refer to Master Response No. 3 for an explanation of the development of future traffic forecasts and the inclusion of development projects. Please refer to Response to Comment No. 77-25 concerning the Westside Subway Extension Project.

Response to Comment No. 80-12

LACMTA does not have the authority to install bike lanes. Implementation of bicycle facilities is done through LADOT’s Bikeway Section. The City’s new Bicycle Plan does propose new bike lanes on Wilshire Boulevard from Federal Avenue through Westwood area.

Response to Comment No. 80-13

Please refer to Response to Comment Nos. 80-2 through 80-12. The commenter’s concerns have been noted and will be forwarded to the decision makers for their consideration.
July 26, 2010

Ms. Martha Butler
Los Angeles Metropolitan Transportation Authority (Metro)
One Gateway Plaza, 99-23-1
Los Angeles, CA 90012

Dear Ms. Butler:

Thank you for the opportunity to comment on the draft Environmental Impact Report/Environmental Assessment (EIR/EA) for the Wilshire Boulevard Bus Rapid Transit (BRT) study. This project would convert existing travel lanes to peak-period bus lanes from 7 a.m. to 9 a.m. and 4 p.m. to 7 p.m. on Wilshire Boulevard from the western City of Beverly Hills city limits to Centinela Avenue and from the eastern City of Beverly Hills city limits to Valencia Street. The City of Beverly Hills will closely monitor the success and impacts of this project.

City of Beverly Hills staff submits the following comments:

Impact T1: Exceed LOS criteria under projected 2012 and 2020 levels of service. The draft EIR/EA shows a 2012 project Level of Service Impact during the a.m. and p.m. peak at Fairfax Avenue and Olympic Boulevard. The EIR/EA does not include an analysis of Olympic Boulevard signalized intersections within the City of Beverly Hills. We request an explanation of why these intersections were not included and/or further analysis.

Section 4.1; Impact T2: Exceed significance criteria for local residential streets. The draft EIR/EA notes that “the proposed project would result in less-than-significant impacts on local residential streets.” The EIR/EA does not show study of any residential streets within Beverly Hills. Staff requests study and counts be conducted prior to and after the project on the 100 block of N. Gale Drive, Whittier Drive between Wilshire and Sunset Boulevards and Merv Griffen Way.
Section 4.1: Impact T4: Result in auto/bus transition conflicts at certain locations. The draft EIR/EA notes that installation of appropriate signage along Wilshire Boulevard will be needed when the roadway transitions from three mixed-flow lanes to two mixed-flow lanes and one bus lane during peak hours. According to the EIR/EA, the westbound transition occurs at the City of Beverly Hills city limits. Due to the proximity to the Wilshire/Santa Monica Boulevard intersection, we request further study if a longer transition area is needed for the westbound transition. Any signage installed within the City of Beverly Hills would require prior approval by the City’s Traffic Engineer.

Again, thank you for the opportunity to comment on the draft EIR/EA for the Wilshire Boulevard Bus Rapid Transit (BRT) study.

Sincerely,

David Gustavson
Director
COMMENT LETTER NO. 81
Kunz, Aaron, Deputy Director of Transportation
City of Beverly Hills Department of Public Works and Transportation

Response to Comment No. 81-1

Comment noted. As this comment does not state a concern or a question regarding the adequacy of the analysis in the Draft EIR, no further response is warranted. However, the comment will be forwarded to the decision makers for their review and consideration.

Response to Comment No. 81-2

Please refer to Master Response No. 1 for an explanation of how the study intersections were identified.

Response to Comment No. 81-3

As identified in the Draft EIR/EA and the TIA, there is little reason to anticipate cut-through traffic on residential streets (please refer to Master Response No. 13 regarding cut-through traffic in adjacent residential areas). The trip diversion implied by the commenter would only potentially benefit relatively long-distance trips, which are not the majority of the trips on Wilshire Boulevard. The Wilshire BRT project would be designed to make the smoothest transition possible from Beverly Hills into Los Angeles, but there would ultimately be the loss of the curb lane for through traffic. If this creates queuing in the vicinity of the Los Angeles Country Club that extends to Whittier Drive on occasion, some westbound traffic may choose to use Whittier Drive and Sunset Boulevard as an alternate route. The amount of traffic that would be likely to do this is limited as the distance between Sunset Boulevard and Wilshire Boulevard is significant, so traffic with local destinations on Wilshire Boulevard would not benefit from doing this. The 100 block of Gale Drive also seems unlikely as an alternative route in the eastbound direction. Traffic would most likely use this street only if they were going up Gale Drive to Orlando Avenue to 3rd Street, which involves going through a long signal at San Vicente Boulevard and then several stop-controlled intersections. Should eastbound traffic divert at this location, it would be more likely that they would use San Vicente Boulevard south to Olympic Boulevard. In addition, Merv Griffin Way is not a residential street. Since the City of Beverly Hills has expressed this concern, LACMTA would coordinate with the City of Beverly Hills on this matter.

Response to Comment No. 81-4

Since the segment of Wilshire Boulevard within the City of Beverly Hills is not part of the project at this time, easy transitions at the city limits would be made. Transition areas of approximately 300 feet would be provided to allow through traffic to exit the bus lane. Appropriate signage would also be installed along Wilshire Boulevard, particularly near transition areas, to inform motorists of bus lane operation during peak hours. Approval by the
City's Traffic Engineer will be sought if any signage is to be installed within the City of Beverly Hills.