

January 12th, 2011

08-2595-2

Councilmember Bill Rosendahl
Los Angeles City Council
200 North Spring St, Rm 415
Los Angeles, CA 90012

Dear Councilmember Rosendahl:

We are writing to urge you as a member of the City Council Transportation Committee to approve the Final Environmental Impact Report for the Wilshire Boulevard Bus Rapid Transit Project. In particular, we urge you to approve the locally preferred alternative originally proposed by Metro of 8.7 miles running from Parkview to Centinela. We ask you to *reject the request for exemption* of the Comstock to Selby in Westwood. We also urge you not to introduce any proposal to eliminate additional components of the route running through the West Side, including the proposal to remove an additional 2.4 miles of the proposed route on the West Side.

Moving forward with the full Wilshire Bus-Only Lanes without sections removed will send the message: Los Angeles is serious about promoting a transit rather than car-centered transportation system

This project is a historic opportunity for the City of Los Angeles to take a bold step toward better mass transit for hundreds of thousands of people. It is an opportunity to send the message that the City is serious about prioritizing mass transit and those who use it and transitioning away from the transportation policy dominated by the single-passenger auto. The City Council must not compromise this project at the behest of small groups of residents whose primary concerns for an addition 3 or 5 minutes on their car commute. To do so would send the wrong message. The objections raised by residents of Westwood and Brentwood are not only provincial and short-sighted but also in the end at odds with genuine transportation and environmental progress in this city.

Proposals to remove or exempt any section of the Westside runs contrary to the professional opinion of staff from both the Department of Transportation and the MTA. We were present at both the November 17 meeting of the Metro Board Planning and Programming Committee and the December 9 General Board meeting. It was clear that transit planners from both LADOT and MTA believed, based on their thorough assessment of the project, that there was no logic to exempting any section of the Westside. MTA's request to the FTA to obtain permission to exempt the Condo Canyon section (Comstock to Selby) was made at the insistence of MTA Board member Zev Yaroslavsky for purely political reasons in direct defiance of the professional recommendations of transit planning professionals. We studied the arguments made by Supervisor Yaroslavsky and the Condo Canyon residents and we challenged them to provide any legitimate technical arguments for exempting Condo Canyon. It quickly became apparent that this argument was all smoke and mirrors. Likewise, we believe any additional request to remove other parts of the West Side from the project are being made for political rather than technical reasons, without any legitimate grounding in the facts.

Majority of community input has been for a comprehensive city-wide bus-only lane and against the exemption

Over the last five years, bus riders, residents, local businesses, and community groups have sent thousands of postcards and offered testimony dozens of times in support of the complete Bus-Only lanes during multiple rounds of public scoping conducted by Metro. Our allies in the broad-based environmental coalition Green LA, as well as groups like Bruins for Transit at UCLA, the Natural Resources Defense Council, and the Los Angeles County Bicycle Coalition, have repeatedly expressed their support for complete bus-only lanes on Wilshire Boulevard. The community concerns raised first by residents of Comstock Hill section of Westwood and later by Brentwood are a small minority. They are attempting to push drastic changes to the project long after the multiple rounds of public scoping have been completed. *We hope that you would not consider overriding the public input already given, especially by thousands of Black, Latino, and Asian Pacific Islander and low income transit users, and giving*

priority to the concerns of this small minority – almost entirely white and very wealthy. We are concerned this could be a violation of Title VI of the 1964 Civil Rights Act and the Environmental Justice Executive Order 12898.

Conceding to Condo Canyon will set a dangerous precedent and open the flood gates for other NIMBYs

The City Council knows that transit projects with a broad regional benefit regularly face opposition from groups of residents who believe they will be inconvenienced by them. On two previous occasions – 2000 and 2005 – the Wilshire BRT was defeated before it ever got started at the hands of NIMBY opponents. Now some of those same opponents have re-emerged. In short, any further concession threatens to open the floodgates to more NIMBYism, sending the message that any group of residents with wealth and political connections can throw around their weight. This action could not only threaten this project but open other transit projects to more aggressive NIMBY attacks in the future. The precedent is especially dangerous because Condo Canyon and Brentwood residents have not presented a legitimate case grounded in the facts to back their demand. The traffic study paid for by Condo Canyon residents does not make the case that the impacts to them will be *any worse than anywhere else on Wilshire*, and its findings and methodology are disputed by MTA and their EIR. *We ask you to back the findings of MTA's EIR and let the California courts under CEQA make the judgment whether the claims of Condo Canyon's study has any legal standing.*

No transit or traffic logic to exempting Comstock to Selby section of Wilshire BRT

There are simply no sound technical arguments – weighing transit benefits versus negative traffic impact – in support of this exemption from Wilshire. Proponents of the exemption have attempted to make arguments at the MTA Board that 1) exempting this section would have only a negligible impact on bus speed for the length of Wilshire; 2) including this section will be back up traffic substantially. Both of these arguments echo those made in an independent traffic study conducted by Raju Associates and paid for by the Comstock Hill residents themselves. The Bus Riders Union looked carefully at both the Raju study and Metro's Draft Environmental Impact Report (DEIR) and believes these arguments carry no weight. Here are a few key observations:

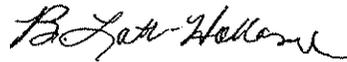
- Out of a total of 74 intersections studied in the DEIR, 19 intersections will be negatively impacted by the project in terms of traffic. None of the intersections in the Comstock-Selby neither stretch nor any adjacent to it are mentioned on the list of 19. None of the 19 intersections are proposed for exemption.
- The DEIR shows that in the first year of operation (2012) and in 2020, neither of the major intersections in the disputed area shows any delay in travel time for cars: Beverly Glen/Wilshire and Comstock/Wilshire. The Raju study's claims that these two intersections and nearby Westwood/Wilshire would be negatively impacted are based on an different methodology, the DEIR specifically responds that the Raju study's methodology is inadequate.
- Raju study claims that exempting Comstock to Selby won't hurt the project because the buses already run smoothly on this section. But the DEIR responds that the Raju study only observes bus speeds mid-street (at their top speed between two intersections), and does not examine bus delays when approaching or stopped at intersections backed by traffic. The timesavings for the Bus-Only Lanes on the Comstock to Selby section is equivalent to other sections of the corridor and every section adds on to the overall 30% timesavings of the project.

For all these reasons, we urge you to vote to approve the complete 8.7 miles Bus-Only Lanes project as proposed in the EIR, with no exemptions.

Sincerely



Sunyoung Yang
Lead organizer, Clean Air Campaign



Barbara Lott-Holland
Co-Chair Bus Riders Union

CC: Members of the City Transportation Committee
Mayor Antonio Villaraigosa
Metro CEO Art Leahy
Peter Rogoff, Ray Tellis, Leslie Rogers, David Longo Federal Transit Administration