

South Brentwood Residents Association  
149 South Barrington Ave. #194  
Los Angeles, California 90049

Susan Robinson, Dept. of City Planning  
200 N. Spring St. Rm. 667  
Los Angeles, CA 90012  
by email susanrobinson@lacity.org

Re: Proposed General Plan amendment to reduce sidewalks on Wilshire Blvd. between Federal and Barrington Avenues to allow for implementation of bus lanes.

July 9, 2012

Dear Susan:

I am writing on behalf of the South Brentwood Residents Association (SBRA). SBRA represents approximately 7,000 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. Because SBRA represents residents immediately north of Wilshire Blvd. between Centinela and Federal, the route of the proposed Wilshire BRT runs through our area.

**SBRA strongly opposes reducing the sidewalk width between Federal and Barrington on Wilshire Blvd. Adding bus lanes in this two block area offers no material improvement in bus speeds, yet it causes problems for many residents, students, and visitors to the area. It also contradicts City policy and the Community Plan:**

- The WLA and Brentwood-Pacific Palisades Community Plans designate Wilshire Blvd as a major Highway Class II which requires 12 foot sidewalks on both side of the highway. This proposed reduction contradicts that City policy.
- The Wilshire Blvd Community Design Overlay (CDO) for West Wilshire requires encouragement of a pedestrian-friendly environment. Reducing the sidewalks in this section makes it impossible for pedestrians to walk there, and therefore directly contradicts the CDO.
  - Ironically, the bus lanes are designed to encourage bus ridership, so reducing the sidewalks so that pedestrians can't get to the stops and have no room to wait at them goes directly against the objectives of implementing the bus lanes in the first place.
  - Wilshire Blvd. will also be the pedestrian access for a future VA subway stop, so narrowing the sidewalks prevents people from walking to the subway as well.
- Widening the sidewalk violates The Americans with Disabilities Act because it does not leave adequate space behind bus benches and adjacent properties for pedestrians or wheelchair access:
  - 1) Two of the bus benches on the north side of Wilshire currently have only 2 ½ feet and 4 ¼ feet behind the bench for pedestrians, so taking out two more feet leaves no room for access.
  - 2) A bus shelter on the north side and 2 bus benches on the south side currently have only 5 ½ feet behind the bench to allow for pedestrian passage.
  - 3) Patients in wheelchairs and walkers will no longer be able to access the medical building on the south side of Wilshire between Federal and Barry.
- The plan to widen the street in this location ignores the dozens and dozens of University High School students who wait at the bus stop at Barry and Wilshire in front of the 7-11 every day after school. The current sidewalk is not sufficiently wide to accommodate all of the students, many of whom are forced to stand in the 7-11 parking lot while waiting for the bus. Taking away two feet of sidewalk will push these students into the street as well as the parking lot **and creates a hazardous and unsafe situation for these teenagers.**

- By holding this hearing in July, City Planning and Metro clearly have not given notice to the parents and students who are impacted by the proposed sidewalk reduction so that they have an opportunity to give input into this proposal. **Failing to give proper notice to this strongly impacted group creates substantial liability for the City and Metro if any students are injured as the result of narrowing the sidewalks at this extremely crowded bus stop. Therefore, any decision on reducing the sidewalk width must be delayed until the parents are notified and a hearing is held during the school year.** Clearly these students do not live in the immediate area, or they would not be waiting for an eastbound bus after school.
- The Wilshire CDO requires additional trees and landscaping, but reducing the sidewalks requires the removal of nine mature ficus trees with no plans (or room) to plant new trees in that area.
- Within 2 feet of the current curb there are numerous traffic signal boxes above and below ground, high voltage street lighting, fire hydrants, street sign poles, traffic signal and street light poles, newsracks, all of which will encroach on the current pedestrian space and the bus lanes.
- In May 2009, SBRA hosted a community meeting titled “Planning for the future of West Wilshire Blvd” and a Wilshire Walk where you and Michelle Sorkin requested our participation in evaluating the roadways, sidewalks, buildings, signage, and landscaping that was a step toward completing the long-delayed yet legally required update to the Community Plan. *As this Plan is not yet completed, decisions like changing the sidewalks should not be implemented.*
- The FEIR for the Wilshire BRT showed only a 3 to 4 minute improvement in travel time for bus riders if bus lanes were implemented between Centinela and the 405. Therefore, *the incremental improvement in widening two blocks is immaterial in the overall time savings for riders.*
- At the City Council and Metro Board hearings on the bus lanes, Councilmembers and Metro Board members suggested that if the bus lanes caused severe traffic congestion in our area, as was the case with two sets of bus lane trials, the bus lanes could be taken out. However, even if the bus lanes are eliminated, the sidewalks would remain permanently reduced.

For all of these reasons, we request that you not reduce the sidewalks between Federal and Barry. In any event, no action should be taken until a hearing can be held when University High is in session and the impacted students and their parents have a chance to give input.

Thank you for your consideration of this issue.

*Marilyn Krell,*  
President SBRA