

South Brentwood Residents Association

149 South Barrington Ave. #194
Los Angeles, California 90049
www.southbrentwood.org

April 15, 2013

Lameese Elqura
Department of City Planning
200 North Spring Street Room 667
Los Angeles, CA 90012

Via email: Lameese.elqura@lacity.org

Re: Expo Transit Oriented Scoping Comments

Dear Ms. Elqura:

I am writing on behalf of the board and members of the South Brentwood Residents Association. SBRA represents approximately 7,500 residents who live in the area south of San Vicente Blvd., east of Centinela and west of Federal. Wilshire is our southern border.

Bundy is one of only two north-south streets that link Brentwood to areas south of us, and is therefore of vital importance to our area. The area that surrounds the site of the Exposition stop at Bundy is one of the most gridlocked areas in the entire city during peak hours as commuters from all around the County drive into the Westside in the morning and out at night.

We are concerned that the Transit Oriented Development concept as proposed imposes a "one size fits all" mentality to every Expo stop. In particular, we are strongly opposed to allowing additional density within a half mile radius of the train stop with no regard given to the traffic implications that this causes.

Increasing density may be appropriate for some Expo line stop, but within ½ mile from the Bundy stop are many major intersections that already operate at a LOS "D" or "F" during peak hours. This includes Bundy/Olympic, Bundy/Pico, the Bundy entrance to the I-10 freeway, Barrington/Pico, and Barrington/Olympic. Many commuters are cutting through Brentwood and West LA to get to the 405 freeway, and these north-south commuters will not be helped by the Expo line.

We are particularly concerned about allowing increased commercial office space within ½ mile from the Bundy station. The reason that peak hour gridlock is so bad in this area is that too much office space has been built on the Westside without sufficient infrastructure to support it.

We would also note that insufficient time has been given to give comments during the scoping period, as the meeting to present this TOD plan to Westside residents was Wednesday night, April 10 and comments are due by Monday, April 15. This is simply not enough time to circulate the issue to our membership and solicit comments.

Taking into account that these comments may not be complete since we have not had time to circulate the NOP to our members, our current study requests are as follows:

- The DEIR should be on a station by station basis, not as a single set of recommendations that cover all stations. At a minimum, the Bundy stop should be studied separately from the other stations due to the significantly different traffic conditions.

- The study area must be large enough that it covers all impacted intersections. In other words, if the edges of the study area show impacted intersections, the study area must be expanded until no significant impacts are shown on the borders of the study area. This is the only way to get a good picture of traffic impacts in the area.
 - The study area should include streets in Santa Monica, east of the 405, and south of the 10 as necessary to ensure that all impacts are covered.
- The study areas should not only look at the area within ½ mile of the station. We have found that traffic studies for other projects near the Expo station had impacts at intersections such as Bundy/Santa Monica, Bundy/Wilshire, Bundy/San Vicente, Bundy/Sunset, Barrington/Santa Monica, Barrington/Wilshire, Barrington/San Vicente, Barrington/Sunset, and Federal/Wilshire, all of which are more than ½ mile away from the Expo station. All of these intersections should be included in the traffic study.
- The traffic study must include the impact of all upcoming projects in the area that have not yet been built, including but not limited to:
 - Wilshire BRT
 - The Casden development at Pico and Sepulveda
 - Papermate (1681 26th Street in Santa Monica)
 - Village Trailer Park (2930 Colorado Avenue in Santa Monica)
 - The development at 3402 Pico Boulevard/2337 & 2403-2409 Centinela Avenue right at the I-10 freeway exit
 - Paseo Nebraska (3020, 3030-3060 Nebraska Avenue, 3025 Olympic Boulevard, & 1819, 1820 Berkeley Street in Santa Monica)
 - Any other pending development adjacent to the Exposition/Bundy train stop
- The study must include alternatives with no commercial office space.
- The study must include alternatives that keep any buildings to a scale in keeping with the rest of the neighborhood, not significantly higher.
- The study must include alternatives that show any projects limited to a size that all significant impacts can be mitigated.
- The study should show alternatives that include easy pedestrian access and bicycle access from surrounding areas to get to and from the station. The study should incorporate ways to get pedestrians across major intersections such as Bundy/Olympic without blocking vehicular traffic and causing dangerous conditions for pedestrians and creating more gridlock. This could include overpasses or underpasses.
- The study should include solutions that require no additional lights or stop signs on major streets, which have the potential to further tie up traffic in the area.
- The study should not include any retail area that could be dedicated to a “destination” grocery store such as a Ralphs, Pavilions, Whole Foods, or Trader Joes, or any “big box” retail such as a Target or Costco.
- No alternatives should merely reduce all components of project pro rata. Alternatives should study the reduction of most intensive uses in a greater percentage than less intensive uses.
- No alternatives should be limited by developer's profit objectives for project. Otherwise there would never be a true required downsize alternative.

Thank you for your consideration.

Sincerely,

Marylin Krell,
President, SBRA

Lauren Cole
SBRA Traffic & Transportation Chair