

71. Comparing this Victory Rapid Bus end-to-end travel time to the comparable figure for the Orange Line, we find that MTA is showing that the Orange Line is between 5.6 minutes (high-end to high-end) and 6.7 minutes (low-end to low-end) faster (45.6 - 40 minutes = 5.6 minutes; 41.7 - 35 minutes = 6.7 minutes).

72. I have shown above that MTA's curious alignment of the Victory Rapid Bus route leaving Warner Center has added considerable distance - .70 miles - over the Orange Line route, and subjected it to traffic delays from multiple added signalized intersections and turns. The question now becomes, how much of the 5.6-6.7 minute difference is due to this strange routing - and would be eliminated by an obviously superior, and totally possible and practical, alternative routing, namely the "due North on Owensmouth, right turn on Victory" one I have discussed above?

73. This has to be approached in several steps, for reasons that will become clear as I proceed through the following.

73. First, how long did MTA assume that it would take for the Victory Rapid Bus buses to get from the Warner Center Transit Hub to the Victory/Variel intersection?

74. I was unable to obtain this information from MTA, despite putting in a Public Records Act request for it within a few days of receiving a copy of the DRFEIR and determining the need for this - evidently, MTA simply did not do this calculation for the Rapid Bus Alternatives using the same methodology as it did for the Orange Line BRT Alternatives. From what I have been provided, it appears that this was simply never calculated or tested. However, I will ask the question here, does MTA have this information? If so, how was it calculated or tested and what are the values? Given that MTA utilized the same type of procedure to time both the "full" Orange Line Alternative and the "MOS" Alternative, which has considerable "street running" (see Figures "A-1" and "A-3" for the "full" Orange Line and Figure "A-2" for the "MOS" Alternatives), why did MTA use a different - and potentially non-comparable or less comparable - methodology to time the Rapid Bus travel times?

75. Therefore, I took my own car out to Warner Center and ran my own tests to approximate what the bus travel time would be.

76. I performed three runs on the DRFEIR Victory Rapid Bus alignment from the Warner Center Transit Hub to the Victory/Variel Intersection on the evening of Monday, November 15, beginning at approximately 9:45 p.m. and extending for over one hour. This is, most definitely, a non-peak rush hour period and traffic was far lighter than would be expected during peak periods, thereby making timed travel periods likely significantly shorter than they would be during the most active times of ridership. In my tests, I made reasonable efforts to approximate the speed and conditions of a bus on these streets, which is one reason why I choose to *not* do

20-78

20-79

20-80

To confirm whether the MTA reflected the 20% speed improvement for rapid bus (compared to local bus), a method using the ratio of VMT to VHT as provided by line in the transportation demand model is not dependable. The better method is to confirm the produced transit travel times directly from the model, which was done in preparing Table 8-8.6 (lower bound rapid bus travel times).

To report the defined travel times in Table 8-8.6, it was necessary to manually extract and add together times from separate "links" in each of the defined paths. In the process of reviewing travel times to confirm that rapid bus did in fact incorporate an automatically calculated 20% speed improvement over local bus, it was found that there were errors in some of the calculations used in this table. Therefore, Table 8-8.6 has been revised. The corrected information does, in fact, confirm that the rapid bus speeds are generally improved by 20% over local bus speeds.

It should be noted that based on the revised Table 8-8.6, the east-west travel times on local and rapid bus routes appear unusually optimistic compared to the BRT run time. This is another case where the rapid bus alternatives were given favorable assumptions in the transportation demand model.

Comment 20-78

The MTA model did not use the specific routings for the ends of the rapid bus alignments.

Comment 20-79

See Response to Comment No. 14-2 regarding MTA's compliance with Mr. Rubin's Public Records Act Request. The MTA's model calculated the travel time



of the Victory route from Warner Center Station Transit Hub to Victory/Variel intersection as part of intermediate calculations of the overall travel time of the RB Alternatives.

Run time calculations for the Rapid Bus alternatives were solely based on the MTA transportation demand model and were never estimated using the run time model used to generate the busway run times. See response to comment 20-77.



these tests during rush hour (driving a car "like a bus" during rush hour on busy streets is not something I would recommend.)

77. As I describe below, these test runs for the DRFEIR Victory Rapid Bus alignment was one of three different alignments I timed. For all three of these, I attempted to be as fair and consistent as possible, including:

- A. Attempting to accelerate from stops, turn corners, and brake at rates and speeds similar to that of transit buses, and using the same techniques for such for all three routes, ignoring any differences caused by differing characteristics of the different vehicles used on different alignments.
- B. Making right turns on red lights – a far more difficult movement in a bus, particularly during periods of high traffic flow, such as during peak hours – only when there was a large amount of clearance from on-coming traffic. As a practical matter, for real-life bus operations during peak hours, right turns on red by buses at intersections such as from Oxnard to Topanga would be extremely problematic.
- C. I did not exceed the posted speed limits.
- D. The Warner Center Transit Mall is set up with the bus layover zones on the "near side" of the signalized intersection at Owensmouth and Promenade Mall (located approximately half way between Oxnard in the South and Erwin in the North) – that is, the buses will stop to discharge and load passengers before they go through this intersection. Therefore, I started all of my timed trips at the "limit line" (the line preceding the signalized intersection past which vehicles should not proceed until the signal turns "green" in their direction or are otherwise authorized) preceding the intersection, leaving and starting the timer when the light on Owensmouth turned "green."
- E. At the other end of the trip, I stopped the timer when my vehicle passed the "limit line" at the intersection of Victory and Variel. If I had to stop for a "red" light at this intersection, the timing continuing until the light turned "green" and I reached the "limit line."

78. My three test runs for this 1.71 mile distance were 5:02, 4:37, and 4:49 minutes:seconds, an average of 4:49 minutes:seconds, or 4.82 minutes – or an average speed of travel of slightly over 21 mph. This is actually a rather high speed for a bus on this alignment, considering the number of turns and signalized intersections, and it is very doubtful to me if it could be maintained by a bus during peak, or even mid-day, periods.

79. Does MTA agree that these values are fairly produced and valid? Does MTA agree that doing these tests during the evening period when traffic was light, compared to rush hours and mid-day periods, produced travel time results that were likely significantly shorter than if these tests were performed during heavier traffic times?

20-80

Comment 20-80

These comments all present information about run times based on driving each of the rapid bus routes, documenting times and distances, and comparing to MTA times and distances.

The MTA used 2020 as its planning horizon for its ridership forecasts, so travel times should also be based on 2020 rather than current-year travel times. As discussed in response to comment 20-20, future bus speeds are automatically calculated as a function of future highway speeds, based on factors that reflect observed data.

As explained in the response to comments 20-28 and 20-29, a separate run-time model is used when there is a separate operating environment to mixed traffic. Rapid bus run times is appropriately calculated as a function of highway speeds.

For a discussion on MTA's model forecast accuracy on modeling run times for buses, see response to Comment 20-33. For the discussion on how the RB Alternatives were encoded into MTA model, see Response to Comment 20-78. In addition, the data presented in the Revised FEIR on the run times of the RB Alternatives are forecasted run times at the year 2020. Thus, comparing the commenter's "test runs" for a portion of the Victory Rapid Bus route does not offer a valid comparison.



80. Now, how long did MTA calculate it would take Orange Line Buses to get from the Warner Center Transit Hub to the beginning of the Busway proper? Turning to the various run time estimates that MTA has produced for inclusion in the Administrative Record (see Exhibit VII); we find that the first two are not usable for this purpose. The run time estimates – Manual Padron & Associates, Figure A-1: Run Time for Bus Rapid Transit (BRT) – 28.8 Minute, Lower Bound, FEIR Technical Appendix: Transit and Transportation, 15 AR 03265 and Figure A-2: Run Time Estimate for Bus Rapid Transit Minimum Operating Segment, 15 AR 03266 – are for travel from North Hollywood to Warner Center, using the longer, “round the block” Westbound route alignment – the wrong route for our current purposes.

81. The third, however – McCormick Rank International, Figure A-3: 36-Minute Run Time Estimate of the BRT Alternative, 15 AR 03267 – is for travel between Warner Center and North Hollywood, the direction we are looking for.

82. For travel between “Warner Center” and “Busway Start” we have a “Total Time Seconds” of 103 – or one minute and 43 seconds.

83. Therefore, between my 4:47 minute estimate of the time required Victory Rapid Bus buses to travel from the Warner Center Transit Hub to the intersection for Victory and Variel over the insipid MTA alignment and the 1:43 minute projection that MTA uses for Orange Line buses to make essentially the same trip, we have a difference of 3:06 minutes:seconds, or 3.1 minutes.

84. Some readers are likely now asking, “How can this difference be so large, the Victory Rapid Bus taking almost three times as long as the Orange Line buses? Even the extra .70 mile that MTA imposed on the Victory Rapid Bus route for no valid purpose doesn’t appear to explain a difference this big.”

85. The readers who might ask this are correct in questioning it. Referring back to Figure A-3, the 36-Minute BRT Run Time Estimate, note the “Length Feet” between Warner Center and Busway Start of 3,200 feet, or approximately .61 mile. The actual distance, per my measurements, is 1.01 miles, or .40 miles more. The 3,200 foot figure is an error – or worse. Obviously, it takes more time to travel 1.01 miles than it takes to travel .61 miles.

86. Does MTA agree that the distance from the Warner Center Transit Hub to the Busway entrance in Figure A-3 is incorrect? Does MTA agree that the time to travel this distance is understated because of this error?

87. Also note the “Signal Delay Seconds” between these points of 18 seconds – .3 minute. For an Orange Line bus to go through four signalized intersections, including crossing two major streets signalized against its direction of travel (Conoga and Victory) with only 18 seconds of signal delay is simply not going to happen. On my test trips along this route, I generally hit “red

Comment 20-81

Please see Response 20-80.

Comment 20-82

Please see Response 20-80.

20-81

20-82



lights,” and often long ones at that, at least two of the last three intersections, Erwin/Conoga, Erwin/Variel, and Variel/Victory.

88. Does MTA agree that 18 seconds of signal delay time to get through the four signalized intersections along this alignment is significantly understated? Has MTA done its own “real world” tests? Does MTA expect that the City of Los Angeles Department of Transportation would grant it any type of traffic signal priority for this “street running” portion of the Orange Line route, similar to the early tripping of “greens” or delays of “reds” that MTA has proposed for the Orange Line Busway proper? If so, what are the details of such traffic priorities at each intersection, including those “street running” intersections for the Westbound trip to Warner Center by Orange Line buses?

89. I ran my own tests on the FEIR Orange Line alignment Eastbound from Warner Center, and recorded times of 4:02, 3:09, and 3:30 minutes:seconds, an average of 3:34 minutes:seconds, or 3.57 minutes – or 1:49 minutes second, 1.8 minutes, longer than the “A-3” timing.

90. Now, let us start with the time difference for travel between Warner Center and North Hollywood that MTA presents in the DRFEIR – 5.6 to 6.7 minutes, as calculated above – and subtract out the 3.1 minutes disadvantage that MTA has manufactured, and we have a remaining difference of 2.5 to 3.6 minutes.

91. Now, going back to the third map in my Appendix V – Superior Rapid Bus Alignment Superimposed on Orange Line Alignment – I submit that, with the very doable alternative Rapid Bus routing I lay out here, Rapid Bus will be *faster* from the Warner Center Transit Hub to the Victory/Variel intersection. With only one right turn and one change of direction for Rapid Bus, vs. two right and a left turn for Orange Line buses and three changes of direction (counting the right turn from Northbound Variel entering the Busway proper to Eastbound), and, from my observations, a likelihood of significantly longer traffic signal delays, how much difference are we left with?

92. Again, I did my own test runs, which produced 2:47, 3:06, and 2:37 minutes:seconds, and average of 2:50 minutes, seconds, or 2.8 minutes.

93. Does MTA agree that this test was valid and produced reasonable results?

94. The “Superior” Victory Rapid Bus alignment is actually 44 seconds, or .7 minutes, *faster* than the FEIR Orange Line alignment, not the 3:06 minutes:seconds *slower* that would appear to be indicated.

95. Let’s subtract this .7 minutes from the 2.5 to 3.6 minutes above, and now we are down to 1.8 to 2.9 minutes difference, and that is with travel time measurements done during a period when

20-82



Comment 20-83

Please see Response 20-80.

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bus travel speeds are far higher than will be encountered during when the vast majority of transit trips will be taken.

20-82

96. Does MTA agree that the above change in the differences between Orange Line and Victory Rapid Bus line end-to-end travel times, due to these various adjustments as discussed above, are valid? Does MTA agree that, if the time trials had been done during rush hour and/or mid-day periods, than the likely result would be that the end-to-end travel times between these two Alternatives would be even closer?

97. MTA has purchased special vehicles to operate on the Orange Line, 60-foot, articulated, Compressed Natural Gas-powered vehicles – See Exhibit VI, “Metro Raised Technology Bar with Super-Sized *Metro Liner*, Bus Prototype Unveiled Today in North Hollywood,” October 15, 2004, “Of the 200 Metro Liners, 22 will be deployed on the Metro Orange Line, a 14-mile exclusive Transitway due to open in 2005.”

20-83

98. 60-foot articulated buses, 50% longer than the current American standard 40-foot buses, have advantages for certain transit uses, most notably the approximately 50% larger passenger carrying capacity. However, there are also disadvantages.

99. In this particular, one important disadvantage is that articulated buses are generally slower to accelerate than 40-foot buses, all else more-or-less equal. In fact, as it turns out, the *Metro Liner* buses have acceleration performance characteristics that are significantly less than the bus operating characteristics assumed by MTA in its calculations of Orange Line running times.

100. Let us again refer to Figure A-3: 36-Minute Run Time Estimate of the BRT Alternatives (15 AR 03267) in Exhibit VII.

101. First, let us examine the travel time between Tampa Avenue and Wilbur Avenue. Reading across A-3, on the line that is, vertically, between these two “Station/Intersection” in the right column, we see that:

- A. The distance between the end points is 2,700 feet
- B. There is a Signal Delay of 12 seconds at Tampa – which means that the bus will begin this segment from a stop
- C. There is no Signal Delay at Wilbur – meaning that the bus will *not* be stopping at Wilbur for a traffic signal
- D. The Maximum Speed over this segment will be 55 mph
- E. There is a 20 second Dwell Time at Tampa – which means that the bus will begin this segment from a station stop – and no Dwell Time at Wilbur, which means



- there is no station on this end of the segment – meaning that the bus will *not* be stopping at Wilbur for a station
- F. The Total Time Seconds¹⁶ to cover this distance is 52 seconds (actually, 51.87)
- G. The (average) Speed is 35.49 mph

102. Does MTA agree that the above presentation is a factually correct representation of the data from "A-3?"

103. Now, let us turn to Exhibit VIII, specifically my calculations for the Tampa to Wilbur segment of the Orange Line, and the time-speed-distance schedule for the Orange Line buses. These calculations were made of the basis of data taken from the bid documents, specifically Tab 3, "Vehicle Performance," of North American Bus Industries, the winning vendor in this competition for the *Metro Liner* 60-foot buses that MTA is planning on using on the Orange Line. These may be found in Exhibit IX, specifically the table beginning in the middle of page 5 and extending to page 6, "ALLISON TRANSMISSION DIV – Vehicle Full Throttle Acceleration – Start with Brakes Locked – Clutch Fan Engaged." This is what is commonly known as a "Time-Speed-Distance" Table, showing how many seconds, and how many feet of travel, it takes this particular bus to reach a specified speed with a "Gross Load" of passengers on level ground from a dead stop. This is *the* table to utilize to determine how long it will take a bus to travel a specified distance from a dead stop.

10.4 Does MTA agree that it is proper to utilize this table for these types of analysis? If not, what should be altered?

105. We know that the distance to be traveled is 2,700 feet and that the Orange Line buses will be starting from a stop on this segment, so, going to the "dist ft" (distance in feet) column, we go down it until we reach 2,700 feet. We find that it will take this bus 53.16 seconds to 2,507 feet and 56.15 seconds to cover 2,716 feet. Using simple interpolation, we find that it will take this bus, under full acceleration, approximately 55.92 seconds to reach the end of this 2,700 segment – which is 4.05 seconds more than is calculated in the MTA run time model¹⁷. (Actually, it will take a bit longer than this. MTA has stipulated a maximum speed of 45 mph through the Orange Line intersections, and, under the above calculation methodology, the *Metro Liner* buses would be doing just under 48 mph when they reached Wilbur at the end of the segment, so they will have to either stop accelerating when they reach 45 mph or slow down from a slightly higher speed to go through the intersection. For this particular segment, this difference in time is minor and will be ignored.)

¹⁶ "Total Time Seconds" includes Signal Delay Time and Dwell Times at stations at the ends, but not the beginnings, of the segments.

¹⁷ Figure A-3 rounds all time to the nearest second. I have recalculated the seconds to hundredths in a schedule that may be found in Exhibit VIII.

Comment 20-84

Please see Response 20-80.

Comment 20-85

Please see Response 20-80.

20-83

20-84

20-85



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106. Does MTA agree with the calculations and conclusions from the above analysis? If not, what are its objections and what would it do differently, and what result would be produced? If MTA offers up different data and/or values, then why was not this material produced by MTA in response to my Public Records Act request on this subject? (See Exhibit XVIII.)

20-85

107. Let us now examine the Corteen Avenue to Laurel Canyon Blvd. segment from "A-3." Using the same methodology as utilized above, we know the following about this segment:

20-86

- A. The distance between the end points is 1,850 feet
- B. There is no Signal Delay at Corteen – which means that the bus will not be stopped at a traffic signal to begin this segment
- C. There is no Signal Delay at Laurel Canyon – meaning that the bus will not be stopping at Laurel Canyon for a traffic signal to end this segment
- D. The Maximum Speed over this segment will be 35 mph¹⁸
- E. There is no Dwell Time at Corteen, which means no station at the beginning of the segment, but there is a Dwell time at Laurel Canyon, so the bus will be braking to a stop at the station at the end of the segment
- F. The Total Time Seconds to cover this distance is 41 seconds (actually, 40.7886)
- G. The (average) Speed is 30.22 mph

108. Does MTA agree that the above presentation is a factually correct representation of the data from "A-3?"

109. The reason that this segment is presented is because it allows the calculation of the rate of braking utilized for this segment and, one assumes, the braking algorithm for the rest of the segments. Again referring to my calculation in Exhibit VIII for this segment, we find an Average Deceleration Rate of 3.6845 mph/second. I will use this value for the following calculation. (This is somewhat higher value than I expected, but I will make no adjustments to run times as a result.)

20-87

110. Does MTA agree with my calculation? If not, what are its objections and what alternative conclusion would it draw? If MTA offers up different data and/or values, then why was not this material produced by MTA in response to my Public Records Act request on this subject? (See Exhibit XVIII.)

111. Finally, let us turn to the White Oak to Balboa segment, where, following the convention established above, we find:

20-88

¹⁸ Unlike the "28.8 minute" run time calculation for the "lower range," which assumed a 55 mph maximum speed on Chandler, the calculation of the 36-minute run time by MTA in this schedule *does* reflect the agreed-upon 35 mph lower maximum speed on Chandler.

Comment 20-86

Please see Response 20-80.

Comment 20-87

Please see Response 20-80.

Comment 20-88

Please see Response 20-80.



- A. The distance between the end points is 6,150 feet
- B. There is a Signal Delay at White Oak – which means that the bus will be stopped at a traffic signal to begin this segment
- C. There is a Signal Delay at Balboa – meaning that the bus will be stopping at a traffic signal to end this segment
- D. The Maximum Speed over this segment will be 55 mph¹⁹
- E. There is Dwell Time at White Oak, but not at Balboa, which means a station stop at both the beginning, but not the end, of the segment
- F. The Total Time Seconds to cover this distance is 120 seconds (actually, 119.94)
- G. The (average) Speed is 34.94 mph

112. Does MTA agree that the above presentation is a factually correct representation of the data from "A-3?"

113. As my calculation in Exhibit VII shows, in this segment, the very low rate of acceleration means that the *Metro Liner* requires 4,926 of the total 6,150 feet of this segment to reach 55 mph. This, and the use of the 3.6845 mph/second rate of braking from the Corteen to Laurel Canyon segment, translates into an actual segment travel time over 23 seconds longer than MTA has assumed.

114. Does MTA agree with my calculation? If not, what are its objections and what alternative conclusion would it draw? If MTA offers up different data and/or values, then why was not this material produced by MTA in response to my Public Records Act request on this subject? (See Exhibit XVIII.)

115. There is one additional factor that may cause further travel time overages compared for actual Orange Line operations over MTA's calculated travel times. At those locations where there are both dwell times and signal delays at the same location – Reseda, Balboa, Sepulveda, Woodman, and Valley College – the buses will actually stop *twice*, the first time upon reaching the traffic signal, the second time when they reach the station [almost all Orange Line stations, and all but Sepulveda in the Eastbound direction, are "far side" stations, meaning that they are on the "far side" of a traffic signal for an approaching bus]. It takes more "vehicle in motion" time to stop at a traffic signal, then start from a stop, go a short distance, and then stop at a station, than to simply go through the intersection at speed without stopping and then only stop at the station. I am unable to determine how the MTA "A-3" and other run time calculations handle this situation, if at all and, therefore, have made no adjustments for it. However, from what data I have and have been able to analyze, I do not believe that there is an explicit adjustment for this

¹⁹ Unlike the "28.8 minute" run time calculation for the "lower range," which assumed a 55 mph maximum speed on Chandler, the calculation of the 36-minute run time by MTA *did* reflect the agreed-upon 35 mph lower maximum speed on Chandler.

20-88

20-89

20-90

Comment 20-89

Please see Response 20-80.

Comment 20-90

Please see Response 20-80.

The bus signal priority provided by the City of Los Angeles is that (a) provision of priority for far-side stations is more beneficial for both transit and traffic flow due to the typical very short "green-hold" time (the City's loop detection allows for very precise timing to avoid unnecessary impact on cross-traffic with typical green hold times of just over one second); and (b) allocation of priority time to the single Orange Line will be much easier than allocation of signal priority to many more Metro Rapid lines (both in terms of numbers of lines and intersections, and the competing needs of these lines and intersections with attendant impacts on central signal control processing of continuous interventions). The deployment of BRT with far-side station locations preferred is consistent with industry best practices.



factor in "A-3" or the other run time projections and I was unable to determine where any implicit adjust for this factor could be performed in these Figures.

116. In the "A-3" and other Orange Line end-to-end travel time projections, is there any adjustment for such "double stop" situations, as described above? If so, how was this done and what are the calculations? How much time does MTA believe adjustment for these "double stop" segments would add to the Orange Line end-to-end travel times?

117. I have, above, recalculated the travel times for three of the 35 different segments of the Orange Line listed on Figure A-3 and found that the travel time is understated for two of them by a total of approximately 27 seconds, an average of approximately nine seconds for each of the three. It is doubtful that the average added travel time for all 35 segments would be nine seconds (a total of 315 seconds, or five-and-one-quarter minutes), but if the average was even two seconds – a very low figure – then over one minute would be added to the end-to-end travel time.

118. If it was four seconds, then over two minutes would be added.

119. Does MTA agree that the slower rate of acceleration of the *Metro Liner* buses will add end-to-end running time to the Orange Line? Has it made any determination of how much would be added to the end-to-end travel time due to this factor? If so, what is that value?

120. Turning now to Exhibit VII, let us do a comparison of Figures A-1: Run Time Estimate for Bus Rapid Transit (BRT) – 28.8 Minute, Lower Bound and A-2: Run Time for Bus Rapid Transit Minimum Operating Segment.

121. I will hypothesize that MTA favored the "full" BRT, as "timed" in Figure A-1, over the Minimum Operating Segment, as "times" in Figure A-2. Let us see how the timing of these two Alternatives received somewhat different treatment as support for this hypothesis.

122. First, as explained above, in A-1, MTA assumed that the Chandler Boulevard operations on both sides of Laurel Canyon would be at 50 and 55 mph, instead of the 35 mph that it had agreed to in the DEIS/DEIR. The reason for this particular error may be one of timing – note the date near the bottom right of Figure A-1, "24-May-00," almost one full year before the release of the DEIS/DEIR. It appears that the decision to slow down the Orange Line buses on Chandler was made after Figure A-1 was prepared, and someone forgot – or otherwise neglected – to revise it.

123. Does MTA agree that the specification of maximum operating speeds on Chandler in excess of the posted speed limit of 35 was incorrect to use in Figure A-1? If the correct top speed was utilized, how much time would have been added?

20-90

20-91

20-92

Comment 20-91

Please see Response 20-80. Before MTA accepts the articulated bus, the bus OEM is required to certify that the bus it built meets the vehicle performance specified in the contract.

Comment 20-92

Please see Response 20-80.



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124. Second, let us go to the other end of the line and check out the largely street running segment from DeSoto/Variel to Warner Center and do some comparison of values between A-1, for the "full" BRT Orange Line, and A-2, for the minimum operating segment (MOS) BRT.

125. Note that the total distance is the same in both – 1.26 miles – and the "bus-in-motion" running times for the three elements are the same – .51, .24, and 1.77 minutes – but the "delay time" (due to traffic signals) is different, a total of 45 seconds for the "full" BRT in Figure A-1, but a total of 63 seconds, or 18 seconds more, for the Figure A-2 "MOS" Alternative.

126. How can two evidently identical buses, running the same route, somehow have such different experiences with traffic signals? Even more interesting, the differences do not involve where the "A-1" buses turn off of the Busway, but the "A-2" buses make a left off of Victory, at the beginning of this segment – where there could be a logical reason for some differences in timing – but at the very end of the segment where they have both been traveling on surface streets for a significant distance. What is MTA's explanation for these differences in running times in what appears to be identical operating environments and conditions?

127. This 18 second difference is not, in and of itself, a major factor, but it does illustrate a very strong and consistent pattern that is found throughout the FEIR and DRFIR – wherever there is an error, a misstatement, or a difference of any type, it *always* favors the MTA preferred Orange Line Alternative.

128. These differences do not directly impact the running time comparisons between the Orange Line and Victory Rapid Bus – other than to illustrate a pattern of behavior – but there is something on "A-2" that does impact it. In the "MAX. Speed" column, note the "35" (mph) maximum speeds for the segments from Balboa/Victory to Desoto/Victory, when the "A-2" MOS buses are operating in street-running traffic on Victory Boulevard, a distance of 5.14 miles.

129. The actual speed limit on this segment of Victory Boulevard is 40 mph.

130. And this is exactly the same route that the Victory Rapid Buses will be traveling – except that the Victory Rapid Bus route extends further East on Victory, to Haskell, an additional 1.50 miles, before the 40 mph speed limit goes back to 35 mph, for a total of approximately 6.64 miles where the speed limit for the Victory Rapid Buses is higher than MTA has utilized. The 40 mph speed limit actually extends to Conoga in the West, another long block, but we'll ignore that for our current purposes.

131. I do not have the detailed algorithms required to determine exactly how much time this "less than speed limit" speed restriction added to the Rapid Bus trip times for this segment, so I will use a simple approach. To travel 6.64 miles at a constant speed of 35 mph, it takes 11.38 minutes; at 40 mph, it takes 9.96 minutes, a difference of 1.42 minutes. Because the buses will be braking and accelerating for stops and for traffic signals, they will not be traveling at a

Comment 20-93

Please see Response 20-80.

Comment 20-94

Please see Response 20-80.

20-93

20-94



constant 40 mph, so let's toss out the .42 minutes (25 seconds) and just say the difference is one minute, even.

132. My aunt and uncle lived almost in the middle of this section of Victory and I have traveled this stretch of road uncounted times over the past three decades. I can say with a very degree of confidence that, the vast majority of the time, the only problem that a vehicle in motion doing 40 mph would have on Victory is the danger of being rear-ended by a vehicle driving considerably faster.

133. Does MTA agree that the speed limit on Victory Boulevard between Haskell in the East and Conoga in the West is 40 mph and that it was improperly stated as 35 mph in the "A-2" run time calculation? How much did this error improperly add to the run time? Was this lower speed limit assumption improperly included in the run time projections for Victory Rapid Bus? Were the run time calculations for other Rapid Bus lines in the three Alternatives also improperly impacted by incorrect speed limits? If so, which lines and what were the impacts?

134. There is a very significant possibility that the Orange Line will be far slower than MTA is projecting, far slower than even the 40 minute "upper bound." The reason is the strong possibility that a high rate of bus-vs.-auto/truck/pedestrian/cyclist collisions, injuries, and fatalities will lead to Busway buses being significantly slowed, or even required to come to a full stop, at each grade crossing, rather than proceeding through at speeds up to 45 mph. This topic is discussed in greater detail in my comments at page 8.4.13-1, Section 8-4.13 Safety and Security, below, but the short version is that there is only one busway like this in the United States, in Miami-Dade, Florida, and its extreme safety problems led to *all* busway buses coming to a complete stop at *all* grade crossings, and it has been this way for the last five years. Since the *only* comparable Busway in the U.S. has had this extremely negative experience, leading to a complete elimination of all "fast through intersection" operations that were planned for it, MTA has no basis for saying that it cannot happen here and that such safety factors, directly impacting operating speeds, can be ignored.

135. Finally, there is one last potential problem from these segment travel time calculations. When MTA was establishing Line 720, the Wilshire-Whittier Rapid Bus line, the City of Los Angeles Department of Transportation made changes to the traffic signaling patterns over its segment of this line. One of these changes was the now well-known "limited priority" granted to Rapid Buses, where "green" signals for the bus may be triggered early or green signals extended to allow the buses to "make" the light. However, LA-DOT also made changes to the traffic signal progression pattern on Wilshire that did not involve the transponders on the buses and "advance loop" detection devices to trigger these individual changes in signal timing. In the simplest terms, LA-DOT changed the interval between signals at successive signalized intersections, based on the "normal" travel time of Rapid Buses, to give the buses a better chance at getting "green" signals *without* the use of special limited priority measures and equipment.

20-94

20-95

20-96

Comment 20-95

It is not expected that there will a high rate of accidents due to the operation of the BRT Line, and thus there is no need to slow down or stop the buses at each grade crossing. The buses will, for most of the route, be traveling parallel to an adjacent east-west street, and will be approaching the cross streets at the same time as adjacent traffic. This cross-Valley travel will be controlled by synchronized traffic signaling, enhancing the safe operation of the busway and all intersecting streets. (In addition, see Responses 20-80, 20-189 and 20-195)

Comment 20-96

Please see Response 20-80.

The City of Los Angeles did update the signal progression along to minimize unnecessary interventions by the control system to provide Metro Rapid priority. The changes did not fundamentally change Metro Rapid operating speeds, but rather simplified the signal processing for the City, given the very frequent Line 720 service along Wilshire Boulevard.



136. I believe that LA-DOT is, or will be, performing this same type of traffic signal progression change along the Orange Line. In such an operation, *the timing changes must be calculated on the basis of rates of acceleration and deceleration for buses that are actually going to be used on the Orange Line – if the changes are based on buses that are faster than the buses that will actually be operated on the Orange Line*, there could be a considerable disconnect – the new signal progression pattern for the Orange Line could be triggering “green” lights for Orange Line buses that aren’t there yet.

20-96

137. Is MTA working with LA-DOT to incorporate such changes into the Orange Line operating plan? If so, is MTA asking LA-DOT to make changes to traffic signal progressions on the basis of the bus acceleration rates in the “A-1,” “A-2,” “A-3,” or “A-4” schedules, or on the basis of the acceleration schedules of the *Metro Liner* buses?

20-97

138. Also, MTA recently received the first version of these buses, as evidenced by the aforementioned press release. Did MTA perform run tests on this bus? If it did run such tests, did the actual performance of the bus match the performance projections in the bid documents? If not, what actions will be done to either attempt to bring the buses into compliance or change the travel time assumptions for the Orange Line buses?

20-98

139. One last comment regarding MTA’s end-to-end run time projections for the Orange Line: In the series of press releases above, we can see how the “official” MTA run time given to the press and the general public increased from “approximately 30 minutes” when the DEIS/DEIR came out and when the Orange Line was selected as the Locally Preferred Project to “approximately 35-40 minutes” when the FEIR was released and adopted. However, the latest version of the Orange Line end-to-end run time is “approximately 40 minutes” – *without* the “35 minute” lower end of the range – and, interestingly enough, this straight 40 minute projection comes in a press release announcing the unveiling of the *Metro Liner*.

140. Was the “dropping” of the 35 minute run time done because of the realization that the *Metro Liner* buses would be slower than the performance of buses that were utilized to make the original run times, and/or for other reasons? What were the specifics of the change(s), including the when and why?

20-99

141. It is important to understand the impact of MTA’s actions to make the Victory Rapid Bus line appear slower through the various means detailed above – it significantly reduces ridership in comparison with the Orange Line. Speed is an important factor in attracting riders, and MTA’s tactics mean that MTA’s model runs will project fewer riders on the Victory Rapid Bus line, relative to the Orange Line, for reasons that are not valid – do not exist – in the real world.

142. This is particularly significant in the matter of passengers, and potential passengers, for the Victory Rapid Bus line that would be boarding at Warner Center. By the sub-optimal routing from the Warner Center Transit Hub to Victory/Variel, MTA has, in effect, added several

Comment 20-97

MTA did not perform run tests on the *Metro Liner* bus on San Fernando Valley East-West Transit Corridor because construction of the corridor was not yet complete. Generally the bus OEM works on the torque and power curves of a power plant to attain the required vehicle performance.

Comment 20-98

As project progresses, details of its operation are negotiated and refined. As stated earlier, policies for transit priority/pre-emption may be modified in the future which can, in fact, move the travel time of the project closer to the way it was originally envisioned.

Comment 20-99

The methodology to calculate rapid bus travel times was strictly based on its relationship to highway speeds. There is no sinister attempt to make rapid bus travel times any slower. The model did not include any time-consuming turnarounds at the ends of the route, so if anything assumed more favorable conditions than what may turn out to be in actual operations.

In terms of the comments on model sensitivity with respect to travel time, fleet size and ridership, the MTA model was documented and accepted by FTA during the course of Eastside LRT Full Funding Grant Agreement process. The sensitivities of the model are directly related to (1) the coefficients of travel time components assumed in the model, as well as (2) the modal shares in the travel market. The former had been scrutinized and considered within accepted range by the FTA. The latter were based on the observed data from regional travel survey and on-board transit surveys.



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minutes to the Rapid Bus travel time from Warner Center to the Victory (and Vanowen) Rapid Bus stops. This unjustified addition of run time works directly to move some potential passengers between these points to select another option – under the logic of transportation models such as that utilized by MTA – thereby unfairly and improperly reducing the Victory (and Vanowen) Rapid Bus ridership.

143. Under the logic and methodology of the MTA transportation planning model, how much does this unjustified increase in travel time for the Victory Rapid Bus line reduce its ridership? How much do slower run times increase the number of buses, and the capital costs, for Rapid Bus? How much do they increase the operating costs by requiring more buses, and more vehicle operators, and more maintenance? How much does the faster than realistic Orange Line travel times increase its ridership? I note that the Orange Line daily boardings are reduced from 24,700 with the discredited 28.8 minute travel time to 18,700 for the 40 minute travel time (DRFEIR, Table 8-6.5: Ridership, page 8-6-9. How much would further slowdowns, past 40 minutes, impact ridership?

144. Before leaving the topic of *Metro Liner* buses, there is one other matter to consider. On the “Vehicle Performance” section, I direct your attention to page 1, the third line of the detailed specifications, “24000 lbs weight on drive wheels (38.1%).”

145. This appears to be the weight of *Metro Line* with a “Gross Vehicle Load,” the usual standard for such testing of vehicles. “Gross Load” means, according to the American Public Transportation Association Standard Bus Procurement Guidelines²⁰ means the weight of the bus, all tanks full, a driver on board, all passenger seats occupied, and one standee passenger for each 1.5 square foot of standing room, with an average weight per human being of 150 pounds. [See Exhibit X, American Public Transportation Association *Standard Bus Procurement Guidelines – Low Floor CNG* [excerpts], specifically Section 5.1.2, “Definitions,” items (5) Curb Weight, (6) Seated Load, (7) Gross Load, and (9) Gross Vehicle Weight, page 6.]

146. I ask that MTA either confirm that above is the methodology that was utilized to produce the 24,000 pound load on the drive wheels, and the 63,050 pounds “gross vehicle weight” on the previous line in this schedule, or describe the methodology that was utilized to produce these statistics.

²⁰ The American Public Transportation Association (APTA) is the primary trade association and lobbying group for the United States public transit industry. It publishes a series of Standard Bus Procurement Guidelines for different types of buses. The definitions discussed above are taken from the “Low Floor CNG” (compressed natural gas, the fuel for the *Metro Liner* buses) guidelines, intended for 35/40 foot heavy-duty CNG-powered buses. There is no current APTA guideline for 60-foot articulated vehicles. The “Definitions” section of the various APTA Standard Bus Procurement Guidelines are, for the most part, identical between the various other Bus Procurement Guidelines for items that are not unique to the various types of buses, constituting the *de facto* U.S. transit industry standard.

20-99

20-100

Comment 20-100

We could not find “Vehicle Performance” section in the DRFEIR referenced in Rubin’s comments regarding “24000 lbs weight on drive wheels (38.1%.)” As a result, we are unable to confirm if the “Gross Vehicle Load” defined in *American Public Transportation Association’s Standard Bus Procurement Guidelines* was utilized to produce 24,000 pound load on the drive wheels and 63,050 pounds “gross vehicle weight.”

MTA acknowledges California Vehicle Code Section 35554. Before the bus acceptance by MTA, the bus OEM has to certify that the vehicle’s axle loading meets federal, state, and local codes and regulations.



147. I now refer to California Vehicle Code Section 35554, which states, "Notwithstanding Section 35550, the gross weight on any one axle of a bus shall not exceed 20,500 pounds." (Section 35550 has no bearing on the point I am making.)

148. Therefore, it would appear that, for a *Metro Liner* to be legally driven on the streets and roads of California, it would have to shed a minimum of 3,500 pounds (24,000 pounds – 20,500 pounds) on the drive wheel axle. Since the only way that this load can be reduced is to reduce the number of passengers carried, at 150 pounds per passenger, that would mean a reduction of 24 passengers (rounded up, as it is not possible to eliminate a "partial" passenger). The passenger load must be reduced by this amount over the drive (middle) axle area *only*.

149. Are the MTA operating plans for this bus based on compliance with this statutory requirement?

150. From the data available, we do not know if the front and rear axles will be in compliance. Reducing the 63,050 pounds total gross weight by the 24,000 pounds on the drive axle leaves 39,050 pounds to be split between the front and rear axles, an average of 19,525 pounds, or 975 pounds under the 20,500 pound limit. However, in buses, the load on the front axle is almost always far less than the load on the other axles – as the two single tires on the front axle, as opposed to the four tires in "dual" mounts on the other axles, clearly evidences. Therefore, it should not be surprising if the rear axle, in the gross load test, is also over the statutory limit – which would require more reductions in the allowable number of passengers to be "legal."

151. Has MTA conducted an axle load test for all three axles to make the determination of what the maximum passenger load for each axle, and for the bus as a whole, are? If so, what are the results?

152. There is, of course, a special condition that applies to MTA and the Orange Line – the Orange Line Busway proper is designed to be an exclusive busway owned and operated by MTA. As such, it is, arguably, *not* a public road and the Vehicle Code weight restrictions might not apply – to buses operating on the Busway.

153. However, the Orange Line crosses almost three dozen different streets along its exclusive busway path and runs on the streets in Warner Center for approximately one mile or 1.3 miles, depending on direction of travel. In these places, operating on city streets, the Vehicle Code weight restrictions *would* appear to apply²¹.

²¹ Of course, the 178 *Metro Liner* buses that will not be utilized on the Orange Line (MTA press release) will operate on the public streets and roads and will, I assume, be under the VC 35554 requirements, but this is an apparent potential violation of statute that will be left for another place on another day.

20-100

Comment 20-101

MTA does not conduct an axle load test. It is the bus OEM’s responsibility to conduct an axle load test among other tests in order to certify that the vehicle meets federal, state, and local codes and regulations.

Comment 20-102

While acknowledging California Vehicle Code Section 35554, MTA takes no legal position on this vehicle code. Vehicle certification to federal, state, and local codes and regulations is the bus OEM’s responsibility.

20-101

20-102



154. Has MTA taken a legal position as to the application of VC §35554 to the Orange Line route and its various parts? If so, what is this position?

155. Assuming that MTA will not be able to operate *Metro Liner* buses on the Orange Line with their "full" passenger load, this would appear to imply that more frequent service may be required to handle the anticipated loads with fewer passengers on each bus. This, in turn, would increase both the capital and operating costs of the Orange Line and would decrease its "scores" compared to the Rapid Bus alternatives.

156. Has MTA performed such an analysis? Has it made a determination how it would avoid violation of VC §35554? Has it determined how many additional buses, bus runs, and expense would be required to be in compliance with this statute? What were the results of this analysis, if conducted?

157. There appears to be some evidence that MTA has been aware of this problem for many months. At its July 22, 2004 meeting, the MTA Board adopted item 29, "Authorize the Chief Executive Officer to Issue Change Orders to Contract No. C06075 with Shimmick Construction Co., Inc./Obayaski Corporation, J.V. (SOJV) for the Design and Construction to Upgrade the Busway Pavement Structural Section for the Metro Orange Line Project for an Amount Not to Exceed \$2,000,000, Increasing the Total Contract Value from \$157,607,839 to \$159,607,839." (See Exhibit XI.)

158. The primary purpose of axle weight limits is to prevent excess wear and tear on roadways. It appears that MTA, in the above action, may have provided significant evidence that the *Metro Liner* buses will have significant problems in this regard.

159. Referring to Exhibit XXIV, Metro Orange Line August 2004 Monthly Project Status Report, page 3, "Concern No. 3 Traffic Index of the busway pavement design," we see, "MTA technical staff determined that the pavement thickness proposed by the C0675 contractor for Asphalt Concrete (AC) paved segments of the busway is not sufficient to ensure a twenty (20) year design service life under axle loads anticipated from the articulated buses proposed for use on the facility?"

160. What was the axle load referred to above? What data was utilized in the determination of the necessity to upgrade the busway pavement? What passenger loads, and vehicle weight and axle loads for all three axles, were assumed?

161. Page RS-9, Figure RS-2 – Map of the RB-5 Alternative Including Routes and Stops – Many of my concerns regarding this Alternative parallel those for the RB-3 Alternative, particularly those concerning the route alignment for the Victory Rapid Bus and the comparative end-to-end run time with the Orange Line. I will not duplicate these comments here, but they most certainly do apply.

20-102

20-103

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20-108

Comment 20-103

The bus OEM is obligated to certify vehicle conformance to federal, state, and local codes and regulations. We do not anticipate changes in the service frequency. Hence there would be no increase in the capital and operating costs of the Orange Line when compared to the Rapid Bus alternatives.

Comment 20-104

As mentioned in the Board item # 29 (adopted at the July 2004 Board meeting), the City of Los Angeles expressed their concern that SOJV did not consider the projected weight of the 60 foot articulated buses in the calculation of TI using the Caltrans method. Accordingly, MTA and preliminary engineering consultant, STV Inc, re-evaluated the TI value. Based on re-evaluation, it was concluded that the methodology used in calculating the TI value of 9.5 was incorrect, and that the TI of 11.0 is the appropriate design parameter to use for the busway. Caltrans methodology uses Equivalent Single Axle Loads (ESAL's) generated by Truck Traffic, which consist of average axle loads (measured at weigh station) of various combination of three axles vehicles, ranging from empty pick-up truck with trailer to fully loaded truck. However, for the pavement design of the busway (no truck traffic), MTA undertook additional measures to ensure that the Caltrans 20-year ESAL's projection were properly adjusted to address a bus only exclusive facility. The City of Los Angeles Pavement Evaluation Design Unit, and Caltrans Headquarters Division of Design Office of State Pavement Design, were consulted on this issue and also concurred with the revised TI calculation method.



Comment 20-105

The manufactures estimated gross vehicle weight rating of the proposed 60-foot articulated bus at the time when TI was re-evaluated is as follows:

- Front axle – 14,780 lbs
- Middle axle – 21,080 lbs
- Rear axle – 27,120 lbs

Comment 20-106

What data was utilized in the determination of the necessity to upgrade the busway pavement?

Traffic Index (TI) and R-value. The 60-ft articulated bus has 3 axles – each with different loads, the combined loads of the 3 axles are used to calculated an ESAL, which is then used to determine the total 20-year ESAL's, which is then used to determine a Traffic Index used to design the pavement. The R-value is determined by soil analysis.

Comment 20-107

What passenger loads and vehicle weight and axle loads for all three axles were assumed?

The estimated passenger loads and vehicle weight at the time when TI was re-evaluated is as follows:
Peak hours - 100% seated plus 12 standing (53,861 lbs)
12,933 lbs front axle
15,593 lbs middle axle
25,335 lbs rear axle
Non-peak hours - 50% seated (47,465 lbs)
11,190 lbs front axle
14,895 lbs middle axle
21,445 lbs rear axle



162. In my comments regarding the RB-3 Alternative, I was critical of the Sherman Way Rapid Bus alignment because it failed to take advantage of line extension opportunities to serve the Burbank CBD/Media Center, the Burbank Metrolink station, and/or the Universal City Red Line Station. These comments also apply to the RB-5 Alternative.

162. While I critiqued MTA's RB-3 Sherman Way Rapid Bus route alignment as lacking imagination, the RB-5 Sherman Way Rapid Bus route alignment is just plain bad.

163. Between these two Alternatives, there is one significant difference between the Sherman Way Rapid Bus alignments at their Eastern ends. Coming from the West, the RB-3 Sherman Oaks alignment turns right (South) at Lankershim, terminating at the North Hollywood Red Line station. The RB-5 Sherman Way alignment continues East past Lankershim, terminating at Vineland.

164. Why is this a bad route design? Let us turn to Table 8-6.5: Ridership, page 8-6-9. For the RB-3 Sherman Way line, we see Daily Transit Boardings of 10,900. For the RB-5 Sherman Way line, we see 6,800, 4,100 fewer, a reduction of 38%. This is clearly a less preferable routing and it should have been rejected and replaced, by the RB-3 routing if MTA was unwilling to investigate any of the other options I have presented above.

165. While MTA has been very careful not to provide any data on revenue vehicle miles, revenue vehicle hours, or peak bus requirements by line in the DRFEIR, a simple look at the RB-3 and RB-5 route maps on pages RS-8 and RS-9, respectively, clearly shows that the RB-3 Sherman Way alignment is only slightly longer than the RB-5 Sherman Way alignment, meaning that the savings in capital and operating costs from the shorter RB-5 alignment would be very minor, at best.

166. Since the RB-3 Alternative Sherman Way Rapid Bus alignment is clearly superior to the RB-5 Sherman Way route alignment in terms of ridership generated and related factors, such as cost-effectiveness, why did MTA not modify the RB-5 Sherman Way Rapid Bus alignment to be at least as good as the RB-3 routing?

167. Sticking with Table 8-6.5: Ridership, here we have strong evidence here that my critique of the RB-3 Alternative for including the Vanowen Rapid Bus line is proven. I had observed that, if the Vanowen Rapid Bus line did not exist, then most of its 5,200 riders would likely choose to walk a bit further North or South and ride the Victory or Sherman Way Rapid Bus lines instead. With no changes to alignment, or anything else I can determine from the FEIR, the Victory Rapid Bus ridership in RB-5 rose to 16,100, 2,800 higher than the same line in the RB-3 Alternative. The first notion would be all 2,800 came from the RB-3 Vanowen riders. The second notion would be that most of them did, but there were some RB-3 Sherman Way riders

20-109

20-110

20-111

20-112

Comment 20-108

Calculation of run time is addressed in various responses to comments (for example, see responses to comments 20-20, 20-28, and 20-76).

Comment 20-109

The suggested variations to extend the Sherman Way route in the RB-5 Alternative are not considerably different from the analyzed RB-5 Alternative. See Response to Comment Nos. 20-50 through 20-55 for a discussion on how the suggested variations to extend the Sherman Way route are not considerably different from the RB-3 Alternative. See Response to Comment No. 6-3 for a discussion on suggested variants that are not considerably different from the RB Alternatives.

RB-3 and RB-5 were configured to best test the alternatives proposed to the Court. RB-3 followed the proposal to provide three east-west lines serving the North Hollywood Metro Red Line station. The COST proposal recognizes that the major destination in this area of the San Fernando Valley is the Red Line and service from all three corridors was modeled to provide fast and attractive service to the North Hollywood station per the proposal. Other alignment extensions would have provided minimal additional ridership access while increasing the travel time to this key destination and additional operating cost. RB-5 called for a full network of north-south and east-west services spaced across the Valley. Existing transit services in the areas east of Lankershim/Vineland to downtown Burbank and south of Sherman Way/San Fernando Road to the Burbank Media District (have had significantly lower patronage than the other core areas of the Valley. In the interest of developing competitive alternatives, RB-3 and RB-5 were modeled to provide



the best balance of ridership and costs. Note that MTA's adopted Metro Rapid expansion plan does not include services in these areas from the Valley.

Comment 20-110

See Response to Comment No. 4-2 for a discussion on why Sherman Way route as part of the RB-5 Alternative is reasonable route.

RB-5 does not include a Sherman Way Metro Rapid line; however, RB-Network alternative does include a Sherman Way line and assume that the writer is referring to this alternative. The "just plain bad" Sherman Way alignment closely followed the COST proposal recommended to the Court. As noted in comments to 20-109, the service east of Vineland and south of Bob Hope Airport have historically been low performers for transit and nothing in the review indicated that extending the Sherman Way line to the Burbank Metrolink Station, Burbank Media District, and Universal City would have improved the cost effectiveness of this line and alternative.

Regarding inclusion of the Vanowen Metro Rapid in RB-3, this was also done to provide the Court and the MTA Board with the results of this alternative proposed by COST. As the writer notes, the other alternatives tested provide various results for different iterations of these scenarios. MTA did not think that RB-Network was an optimal alternative, but wanted to test it for the Court. The key elements in RB-Network (notably Victory and Sherman Way) were also tested in alternative RB-3 and Victory in RB-5 as well.



that shifted to the RB-5 Victory Rapid Bus line in order to access the North Hollywood Red Line station and other destinations.

168. If we assume that some of the RB-3 Vanowen Rapid Bus riders did utilize the RB-5 Sherman Way Rapid Bus line – which is just about a dead lock certainty – than the reduction in Sherman Way Rapid Bus ridership from the RB-3 to the RB-5 Alternative is even more striking.

169. While what MTA did to the Sherman Way Rapid Bus alignment in RB-5 is bad, the other three RB-5 Rapid Bus lines – Oxnard, Burbank, and Chandler – can only produce one comment: whatever was MTA thinking? The ridership for these three lines combined is 6,400 – less than even the neutered RB-5 Sherman Way Rapid Bus line.

170. I am forced to admit that, at one point in my consideration of Rapid Bus lines in the San Fernando Valley, I did examine a Rapid Bus alignment that would more or less follow the Orange Line alignment on surface streets. However, after a bit of research, I decided that this was unlikely to be a good routing because there were simply not a lot of riders or destinations along most of the route, particularly riders and destinations that would not be better served by service on Victory. The RB-5 Alternative ridership validates my good judgment in abandoning this failed idea, but does not explain why MTA would consider such lines if its objectives was to provide good transit service.

171. There three Southernmost RB-5 routes are all truly insipid. Two, Oxnard and Chandler, are so short as to be in basic conflict with one of the central underlying realities of Rapid Bus – in order to save sufficient time through faster bus operating speed to be meaningful, the passenger's trip length has to be of some length, and, generally, this means that Rapid Bus routes have to be of a certain minimum length. The Chandler Rapid Bus route is 4.3 miles and the Oxnard Rapid Bus route six miles (page 8-2-7). There is simply no way to save any significant amount of time on a 4.3 mile route, or six mile route, through Rapid Bus techniques. And, as MTA well knows from its attempts to operate bus service on Chandler to show that the Orange Line will not disrupt the community, there are really not all that many people along Chandler that have any interest in taking an East-West bus.

172. The Burbank route is, well, I can't say better than the first two, I will say "less worse." It is a bit longer, at 10.8 miles, but it still really doesn't serve any trip generator that is not now served fairly well by other routes. Particularly on the West side of I-405, it is not all that far from Ventura Boulevard, where the 750 Rapid Bus route offers superior access to points of interest.

173. In the RB-3 Alternative, I strongly criticized MTA for cramming three Rapid Bus lines into a mile-wide corridor, North-South. At least all three of the RB-3 Rapid Bus streets had strong "local" bus ridership, with at least two of them (Victory and Vanowen) having over 10,000 working weekday riders (FEIR, page 1-10). But, in the RB-5 routing, MTA has crammed four

20-112

Comment 20-111

See Response 16-3 for a discussion on the same variation suggested by the commenter here.

Please see Response 20-100 for additional information.

Comment 20-112

Staff concluded that the RB-3 and RB-5 alternatives offered by commenters were reasonable and worthy of additional analyses. With the analysis based on 2020 projections of population, land use, and travel patterns, streets that may not currently warrant service may do so in the future, and are therefore worthy of study and analysis.

Regarding Chander Boulevard, it is four lane road (separated by a median) that directly parallels the BRT right-of-way and provides direct access to/from the North Hollywood Red Line Station to Van Nuys Boulevard. Rapid Bus service on Chandler would provide the most direct route to the Red Line station for travelers heading up from the south and transferring at Chandler. Chandler Boulevard also has numerous institutional uses, schools, offices, retirement homes, multi-family housing, and various intersecting bus services. In the year 2020, the NoHo arts district is expected to not only be a major transportation hub, but also an important business, residential, and arts district, serving as both a trip origin and destination.

Oxnard Boulevard was studied as an on-street alternative to the BRT during the DEIR. It provides access to a park-and-ride lot adjacent to the 170 freeway, multi-family housing, Laurel Plaza, Grant High School, Valley College, the Van Nuys government and shopping districts, office and



commercial uses on Sepulveda Boulevard, and various intersecting bus services.

Burbank Boulevard provides access to multi-family housing, commercial uses, Valley College, the Van Nuys business district, the Sepulveda Recreation Area, and numerous commercial and medical uses in the Tarzana area.

Clustering Rapid Bus service in the RB-3 and RB-5 alternatives was worthy of study in that people's propensity to use transit increases the closer the service is to their origin and destination. These alternatives offered very competitive scenarios to the BRT by providing a number of lines in an east/west direction that served to limit walking distances and the need for transfers.

Please see Response 20-100 for additional information.



Rapid Bus lines (Victory, Oxnard, Burbank, and Chandler) into one-and-one-quarter miles, three (Oxnard, Burbank, and Chandler) into three-quarters mile, and two (Burbank and Chandler) into a quarter-mile – and, with the exception of Victory, none of these is a particularly good transit street, and Chandler is particular is a very bad transit street (which makes running the Orange Line down it somewhat questionable, to say the least, at least in terms of ridership along this section of the alignment).

174. I can only ask the question, did MTA deliberately set out to design some of the worst possible Rapid Bus routes? Consider that a rhetorical question, but, whether it did or not, it succeeded. But, what was the reasoning and the justification for consideration of Rapid Bus on these routes? After the extremely poor results when ridership was modeled, why did MTA not attempt to improve the Alternative to the point where the performance was better?

175. Page RS-10, Figure RS-3 – Map of the RB-Network Alternative Including Routes and Stops – Interestingly, this option has three East-West Rapid Bus lines (Victory, Roscoe, and Devonshire), three that are almost exclusively North-South (Topanga Canyon, Reseda, and Sepulveda), two more that are primarily North-South with “diagonals” at their Northern ends (Van Nuys and Laurel Canyon), and one more that is an almost “pure” diagonal (San Fernando Road). Evidently, MTA has included all the costs, capital and operating, of all of these lines in the costs of the RB-Network Alternative.

176. I now refer the reader to Exhibit XII, MTA Metro Rapid Plans, which is taken directly from the Metro Rapid (Rapid Bus) segment of the MTA web site. Referring to the “Metro Rapid Phased Implementation” map, it appears that MTA *already* has plans for implementing Rapid Bus on many of the same routes, or close to the same routes (primarily North-South), as are included in the RB-Network Alternative. (Note that the decision to implement these lines was made by the MTA Board at its September 2002 meeting; see Exhibit XI – September 18, 2002 (10) – Approve Implementation of the Metro Rapid Five-Year Implementation Plan. This was several months after the MTA Board had adopted the FEIR in February 2002.)

177. Let’s examine the four North South Rapid Bus lines in the MTA’s published Metro Rapid Plan and compare them to their six comparable lines in the RB-Network Alternative. Working from West to East, we have:

- A. RB-Network has a North-South Rapid Bus route on Topanga Canyon; there is no comparable line in the Metro Rapid Plan. This is somewhat similar to a Rapid Bus extension that COST has previously proposed (see my September 16, 2004 letter to Roger Snoble), but has some significant differences. COST proposed consideration of Rapid Bus service on Topanga Canyon as an extension of the Ventura (750) Rapid Bus line, in a manner similar to how the “local” Ventura bus line (150) is extended part of the way North on Topanga Canyon, but not all the way to North side of the Valley.

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20-114

Comment 20-113

The commenter correctly notes that the decision to implement certain north-south Rapid Bus lines in the Valley was after the FEIR was originally certified. The FEIR did not consider the effects of these now-approved lines on the Project or its alternatives. The Revised FEIR used the same baseline, updating only if data was unavailable, in order to get the closest underlying circumstances for comparing the RB Alternatives to the Project. If MTA were to consider the effect of these new Rapid Bus lines, MTA would have to reanalyze the Project, requiring a rewrite of the entire EIR. The Court of Appeals did not require MTA to reanalyze the entire Project, but only to consider the additional alternative of multiple Rapid Bus routes.

Comment 20-114

The commenter attempts to compare the subsequently approved N-S Rapid Bus lines with those on the RB Network. See Response to Comment No. 20-113 for the discussion on why subsequently approved N-S Rapid Bus lines were not considered in the Revised FEIR. See Response to Comment No. 4-2 for a discussion on MTA’s reasoning for choosing the configuration of the RB-Network. MTA analyzed the RB Network proposed by COST and found that, with a few minor tweaks, it would provide a reasonable network of multiple Rapid Bus routes for analysis. MTA did not extend these routes to mirror those approved now because they extend beyond the Project area. In addition, the same east-west multiple-route benefit would not be achieved by merely incorporating these existing north-south Rapid Bus lines because existing transfer points are inefficient and take excessive time thereby detracting from their use for interconnecting public transit to the east-west routes of the RB Network.



- B. Both RB-Network and the Metro Rapid Plan have a Rapid Bus line on Reseda, but there are very significant differences between the two routes. The RB-Network line is a simple North-South line operating between Ventura in the South and Devonshire in the North. The Metro Rapid line – scheduled for implementation between December of 2005 and June of 2006 – has two variants. The simpler one appears to service Plummer²² in the North. Heading North, the more complex one turns East on what appears to be Nordhoff, then (with a dogleg in-between) North on Sepulveda, and eventually to San Fernando Road and approximately Hubbard.
- C. Both RB-Network and the Metro Rapid Plan have a Rapid Bus line on Sepulveda, but the Metro Rapid Plan line (scheduled to begin operations between December 2004 and June 2005) extends significantly further North than the RB-Network line. The RB-Network Rapid Bus Line terminates at Chatsworth. The Metro Rapid Plan operates on the same route as the Metro Rapid Plan Reseda line to San Fernando Road and approximately Hubbard.
- D. Most curiously, there is an *existing* Rapid Bus line now operating on Van Nuys (Line 761), running from Van Nuys and Foothill Boulevard in the North to Van Nuys and Ventura, then West to I-405 and over the hills to Wilshire and Sepulveda in Westwood. The Rapid Bus line proposed in RB-Network stops at Van Nuys and Ventura. The only way that I can interpret what MTA is proposing on Van Nuys in the RB-Network plan is that it proposes to significantly shorten the existing line 761, a very important route providing service from the San Fernando Valley to Westwood and the other Westside destinations. Is this really what MTA is proposing?
- E. RB-Network has a line on Laurel Canyon; the Metro Rapid Plan does not. The RB-Network line runs from Van Nuys and Laurel Canyon in the North to Laurel Canyon and Ventura in the South.
- F. The Metro Rapid Plan has a line on Lankershim; the RB-Network does not. The Metro Rapid Plan line (scheduled for operation between December 2006 and June 2007) begins at San Fernando Road and Hubbard in the North and ends at the North Hollywood Red Line station.
- G. Both RB-Network and the Metro Rapid Plan have lines on San Fernando Road (in addition to the Metro Rapid Plan's Lankershim line, which has at least as much of its length on San Fernando Road as it has on Lankershim). The two lines are very different. The RB-Network line operates from San Fernando Road and approximately Hubbard in the Northwest to Burbank Airport Metrolink station. The Metro Rapid Plan line operates from the Burbank Metrolink station in the Northwest to the Glendale CBD and returns to San Fernando Road to eventually reach the Los Angeles CBD.

20-114

The inclusion of Topanga Canyon as an extension of the Metro Rapid was deemed inappropriate. First, the key demand point will continue to be Warner Center for the Ventura Metro Rapid. MTA has previously considered extending the Ventura Metro Rapid north to Sherman Way, but has had concern that this would make focusing service on Warner Center difficult and detract from ridership. As well, MTA was concerned that ridership north of Warner Center would not meet expectations and that operation of both short trips and long trips would be needed; something that violates the basic “simple route” Metro Rapid tenant. On very heavy lines like 720-Wilshire/Whittier and 754-Vermont MTA has had to institute short lines for cost effectiveness, but doing so on a line with less frequency like 750-Ventura would add unnecessary complexity and degrade service. Consequently, MTA modeled the Topanga Canyon route separately.

The COST version of the Reseda line was included in RB-5. MTA modeled what we believed to be the most cost-effective alternative for Reseda that was consistent with the COST proposal. The existing local service between the modeled end-of-the-line on Reseda and the MTA Plan version at Sylmar-San Fernando Metrolink has had significantly lower ridership than the core alignment along Reseda.

The current 761-Van Nuys Metro Rapid does continue south to West Los Angeles. However, current ridership has been less than expected and line adjustments are being discussed at MTA. Thus the COST recommended alignment were modeled in the interest of cost-effectiveness.

²² The “Metro Rapid Phased Implementation” map is very short on street names and other geographic description data. Street names for these routes in my narrative above are my best approximation and may not be correct in every detail.



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178. On both a network and a route-by-route basis, based on the above, why has MTA suggested a set of Rapid Bus lines for the RB-Network Alternative that is significantly different from Rapid Bus lines that it itself has designed in its Metro Rapid Plan – and, in one case, Van Nuys, significantly different from a Rapid Bus line that MTA has actually been operating for many months?

179. These comparisons come back to another question, which is, "how did MTA come up with the bus lines in the RB-Network? The answer appears to be, from COST.

180. Exhibit XIII – San Fernando Valley Public Transportation Analysis – East/West Burbank-Chandler Busway – was developed by COST and was presented to MTA at various public hearings during the public comment period on the DEIS/DEIR in 2001. The second to last page of this document – "C.O.S.T.'s ALTERNATIVE – Rapid Bus Network" – is a map that is very close to, but certainly not identical with, the RB-Network Rapid Bus route structure.

181. Now, it was certainly good of MTA to "respect" COST enough to model this network, but we wish that it had instead respected our repeated attempts to meet with MTA to determine exactly which network, or networks, of Rapid Bus lines in the Valley that should be modeled, as clearly evidenced in my two letters – and detailed technical discussion of exactly this issue – to Roger Snoble of July 23 and September 16 of this year, Exhibits II and IV, particularly Sections II.-V., pp. 4-21 of the attachment in Exhibit IV.

182. In addition, note Exhibit XIV, fifteen one-page advocacy White Papers on various Orange Line and related topics, originally prepared by me for COST in November, 2002 – and which I have personally acted to bring to MTA's attention²³. Papers IX., "A Network of Rapid Bus Lines, Together with Other Improvement to Valley Bus Services, Would Provide Far More Benefits to Valley Transit Riders than the SFV BRT," and X., "MTA Has Refused to Even Consider Rapid Bus and Other Low Cost, Low Impact, Widespread Improvements to Valley Transit as Alternatives to the Proposed SFV BRT," clearly show that COST has been advocating that the study of a Rapid Bus Network as an alternative to the BRT must begin with analysis of which streets are best suited for Rapid Bus treatment, as well as other, low-cost, high-benefit improvements to transit service in the Valley.

183. The Exhibit XIII map – which is very obviously the genesis for the RB-Network Rapid Bus lines – was the product of a group of concerned and interested citizens who got together to see if they could come up with an option that might be superior to what we now know as the Orange Line. Unfortunately, none of the members at that time had any particular detailed training, experience, background, or expertise in transit or transportation planning, design, or operations (

²³ By, among other means, including them as exhibits to an expert report I rendered in re *Labor/Community Strategy Center v. MTA* – and which MTA specifically took notice of in its response.

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The COST proposal was modeled to provide network connections between Ventura and Van Nuys.

MTA set out to test a set of alternatives that had been proposed to the Court. MTA recognizes that in some instances the COST alternatives vary from the MTA plan. MTA tested the COST alternatives because the MTA Metro Rapid Plan had not been developed and adopted at the time that the Final EIR was considered by the Board.

Comment 20-115

The commenter is correct that MTA considered COST's suggested network that provided the genesis for the RB Network Alternative. See Response to Comment No. 4-2 for a discussion on MTA's reasoning for choosing the specific configuration of the RB Network.

Comment 20-116

MTA acknowledges the commenter approval of respecting COST's proposed Rapid Bus network. For a discussion concerning MTA's consideration of Mr. Rubin's prior letters see Response to Comment No. 20-7 through 20-11, and Response 20-118.

Comment 20-117

The commenter's criticism of MTA using COST's proposed Rapid Bus network as the basis for the RB Network is noted for the record. As an initial assessment, MTA modified COST's proposed network to make it more intuitively functional. Once the stops were identified, MTA modeled the RB Network and the results are presented in the Revised FEIR. See Response to Comment No. 4-2 for a discussion on MTA's reasoning for selecting the three RB Alternatives to analyze in the Revised FEIR. See Response to Comment



No. 20-6 for a discussion on the infeasibility of determining the optimum assemblage of multiple Rapid Bus routes for the alternative.

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was not associated with COST at that time), nor did any of them have access to the detailed ridership, origin-destination, transportation models, or any other data or tools that MTA has and which transit professionals use to plan, design, and evaluate routes and route proposals. As a first concept proposal, it illustrates the proposal very clearly and makes a number of suggestions for routes to be considered for inclusion, including several very good Rapid Bus lines, but it was never prepared to be a detailed implementation plan.

184. This route structure from COST was clearly an illustration of a "concept," not a final product. It was an idea that COST members thought had promise, but required skilled technicians to fine-tune and implement – and skilled technicians who were *not* trying to achieve a pre-ordained result by making Rapid Bus alternatives look bad.

185. Now, interestingly, MTA did *not* simply take COST's original map and present it as the RB-Network, it made several changes to it. Some of these appear to be improvement; others require some explanation, but could be improvements; and others are not fully understood. These include:

- A. The COST Supulveda Rapid Bus line terminated at Burbank in the South; the RB-Network Rapid Bus line goes all the way to Ventura, which is almost certainly an improvement.
- B. The COST Topanga line and Devonshire line connect at the corner of Topanga and Devonshire, the RB-Network lines connect at the Chatsworth Metrolink station, most likely an improvement, but more data on why this was done would be useful.
- C. At the Southern end of the Topanga line, COST intended it to be a continuation of the Ventura (750) Rapid Bus line; RB-Network has it terminating at the Warner Center Transit Hub, where connections may be made to the Ventura Rapid Bus line. While I can see MTA's reasoning, I can also see the benefit of one-vehicle travel for what appears to be a significant number of people who make this connection daily, and these concepts are not necessarily mutually exclusive.
- D. RB-Network terminates the San Fernando Road Rapid Bus Line at the Burbank Airport Metrolink Station; the COST line continued further on San Fernando Road, literally "off the map." While I can see Metrolink stations as being not illogical termini, there is actually very little Metrolink ridership outside of the morning and evening rush hours, so routing buses here may be more of "we have a site for a transit facility, let's use it," rather than a trip generator service decision, for most of the day. Given the ridership on and near San Fernando Road to points South and East, including Glendale CBD destinations and all the way to the Los Angeles CBD, this RB-Network routing change from the COST map is still up in the air, pending more published facts and analysis.

186. The point, however, is this: MTA made several changes to the Rapid Bus network that COST proposed. Why didn't it consider more changes, utilizing the methodology we proposed?

20-117



Why didn't it meet with COST – or *anyone* outside of MTA staff and consultants – to discuss the best Rapid Bus network for the San Fernando Valley? The limiting factor was certainly not the unwillingness of COST to meet, nor that of other transit organizations and interested individuals in Los Angeles.

187. The transportation planning and modeling process, when done correctly, is a very iterative one; thesis, antithesis, synthesis, repeat, repeat, repeat. It is very common to do several, even dozens, of model runs to develop and fine-tune transit guideway, network, and service plans. The Orange Line was the product of *decades* of planning. Why couldn't MTA make the effort to produce *good* Rapid Bus Alternatives, and other changes to Valley transit service, to evaluate, rather than just putting forth first concept networks as the Alternatives to be evaluated?

188. It is extremely simple to cite examples of how this process *should* have worked. As has been mentioned above, we have quite literally written the book on this for MTA in my letters to Roger Snoble – and MTA has chosen to ignore it. From comparison of the ridership produced by the individual Rapid Bus RB-3 and RB-5 Alternatives, it is very obvious that:

- A. The Vanowen Rapid Bus line is simply not a good one. In RB-3, it had far less ridership than either of the other two lines at approximately the same operating and capital cost as the other two lines. When it was eliminated, in RB-5, Victory ridership increased significantly indicating, almost certainly, that a large segment of the RB-3 Vanowen Rapid Bus riders simply walked a few blocks further, or rode an originating bus a few blocks further, to reach Victory and take that Rapid Bus line.
- B. The RB-5 Sherman Way routing, terminating at Vineland, rather than at the North Hollywood Red Line station in the RB-3 Alternative, is clearly inferior, with a loss of three-eighths of the RB-3 ridership – actually, probably far more, because some of the RB-3 Vanowen riders undoubtedly shifted to the RB-5 Sherman Way line since there was no RB-5 Vanowen Rapid Bus.

189. This process is basic planning 101 – put together a plan, test it, try variations, do comparisons, see what works and what doesn't, incorporate the winners and lose the losers, and then try some other variations. From the details of the TSM Alternative service, and how even more local service was added to the Orange Line Alternative to serve Orange Line stations (FEIR, Figure 2-8: Bus Routing Plan, page 2-30, and Section 2-2.3.3 Bus Routing Plan, page 2-31, ¶2), details of Orange Line park-and-ride lots, and other factors, I conclude that a person or persons with an understanding of transit planning and modeling spent a fair amount of time trying ideas, evaluating, fine-tuning, many, many meetings with other transportation technicians, internal to MTA and external, public meetings, meetings with elected officials, etc., coming up with ways to make Orange Line ridership as high as it could be before encountering obvious loss of cost-effectiveness.

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Comment 20-118

See Response to Comment No. 14-10 for a discussion on consultation for developing the RB Alternatives.

Comment 20-119

The commenter intimates that transit planning conducts modeling to optimize transit systems. As discussed in Response to Comment No. 20-6, it is infeasible to determine the optimal transit system. Rather, transit professions utilize their own training and experience to select the appropriate transit system. Transit system development is not purely computational. MTA is not aware of any transit agency conducting numerous modeling iterations to determine the optimal transit system.

Comment 20-120

See Response to Comment No. 20-119.



190. I see no evidence of any such remotely comparable process in what was done to come up with the three Rapid Bus Alternatives – indeed, these are, collectively, perhaps best utilized as the stem of a question on an introduction to transit planning exam, “What changes would you suggest to improve this transit system route structure – and the process that developed it?”

20-120

191. What is MTA afraid of? Why is it so reluctant to actually plan, model, and report the results for a decent set of Rapid Bus lines, coupled with other simple, easy, inexpensive – but productive and cost-effective – improvements to Valley transit service?

20-121

192. The comparison of the RB-Network Rapid Bus lines and MTA’s Metro Rapid Phased Implementation plan, and associated conditions, leads to a series of questions:

20-122

- A. If MTA already has an approved plan, scheduled and funded, to implement a number of Rapid Bus (or Metro Rapid, which are simply two different terms that MTA uses for the same type of service) lines in the San Fernando Valley, then why are the costs of these Rapid Bus lines included in the costs of the Rapid Bus Alternatives in this DRFEIR? These services are something that MTA has already decided to implement; why are they treated as if the RB-Network, or a close equivalent, is something new and unique to the Second Appellate-required study of Rapid Bus Network Alternatives and must be costed as such? MTA did not, in the FEIR, include the cost of construction of the Pasadena Gold Line in the various Alternatives evaluated, why are the costs of these North-South routes included in the RB-Network Alternative?
- B. If MTA already has an approved plan to implement a number of Rapid Bus lines in the San Fernando Valley, then why aren’t these lines part of the underlying route structure for *all* the Alternatives included in this, and the original, EIR (this includes the No Build, TSM, “full” BRT Orange Line, BRT MOS, *and* the various Rapid Bus Alternatives, particularly the RB-3 and RB-5 Alternatives that have no North-South Rapid Bus service elements)?
- C. If MTA has gone to a great deal of trouble to plan and design a series of North-South Rapid Bus lines that it is currently implementing all over the main populated area of Los Angeles County, including in the San Fernando Valley, then why are there significant differences from the Rapid Bus lines that MTA has already approved and the North-South Rapid Bus lines that are included in the RB-Network Alternative? While certain differences may be logically explained by the inclusion of East-West Rapid Bus lines in the RB-Network Alternative, but not the MTA Metro Rapid plan, this does not appear to explain what are by far the greater part of the differences in the “North-South” Rapid Bus routes in these two different plans. We assume that MTA spent a lot of time and trouble developing the network in its Metro Rapid Phase Implementation Plan [see Exhibit XI, September 18, 2002 (10) – Approve Implementation of the Metro Rapid Five-Year Implementation Plan]. It is, therefore, not unreasonable to assume that four “North-South” lines in this Plan are the lines that MTA believes are the best Rapid Bus options in the Valley. Now, we may differ

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Comment 20-121

See Response to Comment No. 4-2 for a discussion on MTA’s reasoning for selecting the RB Alternatives to analyze in the Revised FEIR.

Please refer to Response 20-112.

Comment 20-122

It was also important to go back to the time when the study was originally completed for an equal comparison. Consequently, there had not been a study for Valley North-South Rapid Bus lines, and, therefore the costs of the north-south lines were included.

Comment 20-123

Please see Response 20-31.

Comment 20-124

Please see Response 20-122.

Comment 20-125

The San Fernando Valley North-South Transit Corridor Study did not begin until after the completion of the FEIR for the San Fernando Valley East-West Transit Corridor. Therefore, for equal comparisons, the north-south lines could not be a part of the underlying route structure in the original EIR.



with MTA's opinion in some particulars, and it is not unreasonable to believe that a "network" of stand-alone "North-South" routes might not be totally identical to the "North-South" routes included in a network of "North-South" and additional "East-West" routes, but what can possibly explain the MTA decision to totally ignore the major portion of the research it had done and decisions it had made regarding the best "North-South" Rapid Bus lines in the San Fernando Valley?

193. The DRFEIR, in the first page of the Revised Executive Summary, states, "The particular multiple Rapid Bus routes analyzed in this Revised FEIR were identified based on information contained in the Court of Appeal's decision, which specifically mentioned comment letters that identified a three-route and a five-route alternative. In addition, the decision also mentioned a network alternative that was put forth by COST. Based on this information contained in the decision, the three multiple-route Rapid Bus alternatives (RB Alternatives) considered and analyzed in the Revised FEIR are as follows:

- Three East-West Rapid Bus Route Alternatives (RB-3)
- Five East-West Rapid Bus Alternatives (RB-5)
- Rapid Bus Network Alternative (RB-Network)"

194. Let us see what the actual language of the Second Appellate decision is – and how what is actually in the decision differs from MTA has set forth above. The following list includes every reference to a network or system or collection of Rapid Bus routes in the Opinion.

195. Let us start at the end, with the Disposition, page 32: "The writ shall direct MTA, on any further proceedings on the EIR, to address the alternative of multiple Rapid Bus routes." There is no mention here of any three- or five-route East-West alternative, nor the Rapid Bus Network Alternative. *This is the controlling reference and it is totally free of any specifics as to the details of routes or networks to be addressed.*

196. The following selections are all from "Discussion," Section IV.B, Alternatives – Rapid Bus:

- A. Page 28, "Moreover, there was no support for the inference (by MTA) the 50 minute runtime on Ventura Boulevard would be the same for other potential Rapid Bus routes, the cited runtime estimate for Rapid Bus was for a route one mile longer than the runtime estimate for the busway route, and the response failed to take into account the fact that with multiple east-west routes, the total origin-to-destination travel time would be reduced for a majority of riders as compared to the busway because most riders would be closer to a Rapid Bus route than to the busway." Here, the key phrase is "multiple east-west routes," but there is no number of Rapid Bus routes, or

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Comment 20-126

See Response to Comment Nos. 20-113 and 20-114 for a discussion on considering subsequently approved north-south Rapid Bus lines.

Comment 20-127

See Response to Comment Nos. 20-113 and 20-114 for a discussion on considering subsequently approved north-south Rapid Bus lines.

Comment 20-128

MTA acknowledges the commenter's cite of the Revised FEIR indicating that the RB Alternatives are based upon the three comments suggesting different variations of the alternative of multiple Rapid Bus routes. See Response to Comment No. 4-2 for a discussion on MTA's reasoning for selecting the RB Alternatives to analyze in the Revised FEIR.

Comment 20-129

MTA has not claimed, and does not claim, that the Court of Appeal has specifically demanded that MTA consider the three comments as alternative of multiple Rapid Bus routes. The Revised FEIR explained that the Court of Appeal's decision mentioned them. The Court of Appeal's decision noted that various comments proposed a series of three or five east-west routes. (Court of Appeal Decision, fn. 8, p. 25, 26.) COST's proposed network has three east-west routes as well. MTA evaluated those comments to determine whether they made sense. MTA determined that the general lay out was reasonable and proceeded to flesh out the details of these routes, which became the three RB Alternatives. See Response to Comment No. 4-2 for a discussion on MTA's further reasoning for selecting the RB Alternatives to analyze in the Revised FEIR.



- any reference to the network proposed by COST. Clearly, there is nothing here that can be remotely claimed to specific instructions by Second Appellate.
- B. Page 28, "TSM was not designed to provide the fastest bus service possible whereas in its own report on Rapid Bus, MTA stated Rapid Bus had provided a substantial travel time advantage over traditional bus service, e.g., operating speeds on Ventura Boulevard had increased by 23 percent. The other alternatives (MOS and Lankershim/Oxnard) were each a single route not comparable to a network of routes. In addition, even though there had been prior efforts to address the Valley's mass transit needs, none of them had considered expansion of Rapid Bus." In the second sentence, there is reference to a "network of (Rapid Bus) routes," but no identification of the COST proposals as "the" network, nor any mention of the number of routes. There is nothing in this citation that requires anything remotely close to specific Rapid Bus routes, networks, or alternatives.
 - C. Page 26, "However, to comments supporting the TMS²⁴ alternative and suggesting adding Rapid Buses and mentioning three or five possible routes, the response was to note the opposition. The response did not address the suggestion of multiple Rapid Bus routes." Here, we do have mention of "three or five possible (Rapid Bus) routes," but this is in the identification of a factual matter, that MTA had not responded to comments regarding three or five Rapid Bus routes. In the second sentence, which is clearly a conclusion of the court, there is mention of "multiple Rapid Bus routes," but no specific number, nor is there any mention of a network of Rapid Bus routes or of the COST Rapid Bus network proposal. The conclusion of the court finds fault with MTA for not addressing the suggestion of multiple Rapid Bus routes, but in no way directs specific routes or networks to be considered.
 - D. Page 25 (footnote 8), "Various comments proposed a series of three or five east-west routes north of Ventura Boulevard, which would complement a series of north-south routes MTA was proposing in the Valley." Here is a specific mention of a three- and five- line systems, but this hardly an order for a specific alternative or alternative to be studied, merely a statement of fact, that these ideas had been proposed by various parties. If MTA chooses to take this as an order to study three- and five-line East-West Rapid Bus systems – which, evidently, it has – then how can MTA fail to include the "series of north-south routes MTA was proposing in the Valley" in its Rapid Bus network, which are mentioned in the same way in the same sentence?

197. Finally, we have, in "IV. COST's Concerns," page 7, "Rapid Bus, which began in 2000, presently includes only one line in the San Fernando Valley, along Ventura Boulevard at its southernmost edge. An alternative to the busway would be to expand the Rapid Bus network by initiating multiple east-west lines on major arterials north of Ventura Boulevard spreading across the Valley." First, as its inclusion in "COST's Concerns" clearly indicates, this is *not* anything

²⁴ TAR: Should be "TSM."

Comment 20-130

The commenter presents the comments already made to the FEIR regarding suggestions of multiple Rapid Bus routes. See Response to Comment No. 20-129 for a discussion on MTA's consideration of the Court of Appeal's decision in developing the RB Alternatives.

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remotely approaching an Order from Second Appellate, it is a statement of COST's positions – and, of course, there is nothing remotely approaching specifics on routes or networks to be studied.

198. The underlying source for what became the three-, five-, and network-Rapid Bus Alternatives is, evidently, found in the "Petitioner's Opening Memorandum of Points and Authorities in Support of Petition for Writ of Mandate," submitted by COST with a filing date of April 2, 2002, to the Superior Court, specifically, from page 24:

"As proposed by community members, the Rapid Bus network could be expanded to include a network of new east-west routes north of Ventura Boulevard. (11 AR 02340; see also 54 AR 13030, 11 AR 02432; see also 54 AR 13054-5, 11 AR 02435; see also 54 13054, 11 AR 02437, 57 13668J.) This would complement – or improve upon – a series of north-south routes in the Valley that MTA had been planning for years. (42 AR 09761-2.)

"Because the Rapid Buses would operate on the existing street grid, they would avoid new impacts while better serving the dispersed population of the Valley than a single transit guideway. (12 AR 02546, see also 56 13415.) This would advance the primary objective of the busway project, which is to improve public transit in Valley.. (8 AR 01523.)"

199. Let us examine each of the above AR citations in turn (Exhibit XVI) to see what they contain that is relevant. (For the "see also" citations, the actual "comment" contents were intended to be the same as the first in each pair – MTA had reduced each comment letter to half a page, putting the responses on the same sheet of 8½x11 paper, making the comments difficult to read; the "see also" was the full-sized comment letters.)

- A. 11 AR 02340 – This comment, by David R. Garfinkle, representing the Tarzana Property Owner's Association, states, "The TSM, supplemented with additional Rapid Bus Corridors along Sepulveda Boulevard or Van Nuys Boulevard and a selected east-west street in the northern portion of the valley, would provide an effective feeder network to the Rapid Transit Corridor and increase public transportation coverage throughout the valley." This comment does mention three Rapid Bus on three streets, but two of them (Sepulveda and Van Nuys) are North-South and the third is an unspecified East-West street. There are Rapid Bus lines on Sepulveda and Van Nuys in the RB-Network Alternative, but that is not a particularly strong correlation.
- B. 11 AR 02432 – This e-mail by Mariana Salazar states, in relevant part, "Until we have garnered the funds to continue the Metro Red Line Subway System into the Valley²⁵, we should place our funds into the TSM Alternative which would

²⁵ TAR: By which she evidently meant the previously planned and well-publicized, but later cancelled, East-West extension of the Red Line, as, at the time of the preparation of this e-mail (July 5, 2001), the Red Line had been operating to North Hollywood in the Valley for approximately one year.

20-130



increase current bus line efficiencies by the addition of buses and implementation of Rapid Buses (including rapid bus technologies) along major East – West Valley streets such as Victory Blvd., Vanowen Blvd., Sherman Way, etc.” Here we find mention of all three of the RB-3 Rapid Bus lines. However, Ms. Salazar’s use of, “such as” and “etc.” makes it clear that these are *suggestions* for streets for consideration for Rapid Bus, not to be considered the entire list, and that there is evidently some degree of uncertainty in her mind regarding the three specific streets she names. This is hardly a definition of a CEQA Alternative, particularly since there are no Eastern or Western limits on any of these proposed potential Rapid Bus routes.

- C. 11 AR 02435 – This comment, by the West Valley Concerned Citizens Group, states in relevant part, “2) A better use of taxpayers money would be to pursue the TSM alternative. It would be a far better idea to install Metro Rapid lines (if not underground Metro Rail) along existing Valley boulevards such as Victory, Oxnard, Chandler, Burbank and Sherman Way.” These are, of course, the five streets with Rapid Bus Service in the RB-5 Alternatives. However, here again, we have the use of, “such as,” again clearly indicating that this is not intended as a definitive list of Rapid Bus routes, but candidates for consideration, and not a complete list of such candidates. Also, there are no Eastern or Western limits proposed for Rapid Bus service on these streets.
- D. 11 AR 02437 – This comment, by Burton Roseman of COST, states in relevant part, “Phase 2 Rapid Bus will add 4 more routes to the Valley, Sepulveda Blvd., Van Nuys Blvd, San Fernando Blvd and Roscoe Blvd²⁶. C.O.S.T. proposes just adding Victory Blvd instead of BRT. Thus, immediately we could have 3 Rapid Bus routes (33-45 minutes) beginning at Warner Center (Ventura, Victory and Roscoe Blvds) going east to the Red Line. We could have 3 routes beginning in San Fernando/Pacoima (San Fernando Blvd, Van Nuys and Sepulveda) connecting them to the Red Line (San Fernando to Lankershim) to the city/county offices (Van Nuys) and to the entire cities’ job opportunities. All 3 of our Community Colleges (Pierce, Valley and especially the most in need, Mission College in Pacoima) would get Rapid Bus service to the Red Line. The Victory line could switch to Burbank Blvd in the East Valley²⁷ for Valley college access.” This comment is fairly explicit on specific routes, far more so, actually, than any other comment – but is evidently *not* the basis for any of the three specific Rapid Bus Alternatives, although all of the lines mentioned are in one or more of the Rapid Alternatives.

20-130

²⁶ This is a reference to the MTA *Long-Range Transportation Plan*, April 26, 2001, specifically pp. 12-13 of the Executive Summary, included as Exhibit XVI. The Valley Rapid Bus service plan was later significantly altered, including elimination of the Roscoe Rapid Bus Line.

²⁷ This reference is in error; it should be “West Valley.”



- E. 12 AR 02546 – This is the comment of mine and my co-commenter, Richard Stone. The cited page has *no* specific Rapid Bus suggestions, but states, “The great advantage of Rapid Bus over the Burbank-Chandler BRT, or any other single alignment transit guideway, is that far more existing and potential riders could utilize a network of Rapid Bus lines than could utilize a single BRT alignment. ... A far superior approach would be a network of Rapid Bus lines that would be useful to far more riders, coupled with other transit and transportation improvements.” Here, there was no discussion what-so-ever of any specific Rapid Bus lines to be implemented, but for a *network* of Rapid Bus lines to be considered. Implicit in the quite deliberate failure to specify specific Rapid Bus routes was the assumption that a valid transportation planning process would identify the best routes.
- F. 8 AR 01523 – This citation was to the MTA’s Major Investment Study for the San Fernando Valley East-West Transportation Corridor, May 1996, and specifically to the “Enhanced Bus/Transportation Systems Management” Alternative, an early version of what became the TSM Alternative in the FEIR. There are no Rapid Bus lines mentioned in this citation.

200. What can we conclude from inspection of these citations? That there is no reasonable basis in MTA’s claim that it developed the three Rapid Bus Alternatives by following the requirements of the Second Appellate decision. There is no Order requiring any specific Rapid Bus lines or networks of Rapid Bus lines to be studied as the Rapid Bus Alternatives, there is not even an order of the number of Alternatives that must be studied. The Second Appellate decision merely observes that various commenters have presented various Rapid Bus concepts *in order to conclude that MTA had not responded to the comments, not to require specific routes or networks to be studied.*

201. Does MTA really expect anyone to believe – after decades and tens of millions of dollars of planning and studies that finally produced the Orange Line Alternative – that the RB-3 Alternative Rapid Bus routes were derived from a single sentence in an e-mail that named three streets for consideration – in terms that included “such as” and “etc.?”

202. Or that the RB-5 Alternative Rapid Bus routes came from a single sentence in a letter from a “Concerned Citizens Group” – again, specifically using the term, “such as?”

203. The RB-Network Alternative *does* derive from the COST Rapid Bus Network concept. However, how does MTA explain why it did not actually adopt the Rapid Bus lines in the concept map, making several changes to them? Why was MTA willing to make some of its own changes (including some that are either clearly improvements or are possibly improvements), but is not willing to make more extensive analysis of what could be done to improve, even to optimize, this network?

Comment 20-131

See Response to Comment No. 4-2 for a discussion on MTA’s reasoning for selecting the RB Alternatives to analyze in the Revised FEIR.

20-130

Comment 20-132

See Response to Comment No. 4-2 for a discussion on MTA’s reasoning for selecting the RB Alternatives to analyze in the Revised FEIR.

Comment 20-133

See Response to Comment No. 4-2 for a discussion on MTA’s reasoning for selecting the RB Alternatives to analyze in the Revised FEIR.

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20-133



204. Any reasonable transit professional, not already committed to a specific course of action, reviewing the first two of these sources would quickly realize that these were comments with very valid points, and that the authors understood, from their common sense, that there were alternatives other than the Orange Line that should have been studied – by experts – before making a decision to spend a third of billion dollars on the Orange Line. But, it would also be clear to transit professionals that the authors did not have the technical knowledge or experience, let alone the required detail data and the means to analyze it, to do the detail design of a route structure for their proposed alternatives – and that this was understood by the authors and clearly indicated by their use of “such as” and “etc.” in their lists of streets to be considered for more detailed analysis.

205. As for the COST Rapid Bus Network, here there was extremely explicit communications from the original proposer, communicated in great detail through multiple channels, that the first step in the Rapid Bus Alternative process was to identify the Rapid Bus lines to be included, and laying out a very specific methodology for doing so – which MTA chose to ignore.

206. Why? Because MTA had absolutely no interest in developing a strong Rapid Bus Alternative or Alternatives that could compete with its favored – yes, pre-ordained – Orange Line?

207. Why did MTA make no effort to produce a good, or even a decent, Rapid Bus network or networks to be studied as Alternatives?

208. Page RS-16, Table RS-2: Summary of Operational Impacts, Land Use and Development (Section 4-1 and Section 8-4.1), Potential Environmental Impacts – Operation – (For all three Rapid Bus Alternatives):

- “Would be inconsistent with the following plans by precluding the construction of a high-capacity transit system in the Valley and/or a transit system/stations in the MTA ROW:
- SCAG Regional Comprehensive Plan and Guide
 - SCAG 2001 Regional Transportation Plan
 - City of Los Angeles General Plan Transportation Element
 - Van Nuys-North Sherman Oaks Community Plan
 - Encino-Tarzana Community Plan
 - Canoga Park-Winnetka-Woodland Hills-West Hills Community Plan
 - Warner Center Specific Plan”

209. First, as far as “precluding the construction of a high-capacity transit system in the Valley,” let us refer to Table 8-6-5: Ridership, page 8-6-9, where we find that the “Daily Transit

Comment 20-134

See Response to Comment No. 4-2 for a discussion on MTA’s reasoning for selecting the RB Alternatives to analyze in the Revised FEIR.

20-134

Comment 20-135

MTA disagrees with the commenter’s allegation that MTA did not endeavor to produce good or decent Rapid Bus alternatives. Rather, MTA found that the three RB Alternatives were reasonable assemblages of multiple Rapid Bus routes to reach the population of the Valley. See Response to Comment No. 4-2 for a discussion on MTA’s further reasoning for selecting the RB Alternatives to analyze in the Revised FEIR.

20-135

Comment 20-136

The commenter’s analysis of daily transit boardings for the Full BRT and RB-Victory in Table 8-6.5 is inaccurate. Table 8-6.5: Ridership reports “daily transit boardings” and “new daily transit trips”. A footnote explains that the daily transit boarding columns for the Rapid Bus Alternatives and the Full BRT are not directly comparable. The footnote states, “Boardings for Rapid Bus routes included in entirety. Boardings for BRT based on fixed guideway stations only. These boardings cannot be directly compared to boardings as reported for the BRT alternatives, which only report those boardings occurring in the fixed guideway portions of the route (that is, board and disembark at stations constructed as part of the San Fernando Valley East-West Transit Corridor project). Also, boardings do not distinguish between whether transit riders are merely shifting off other bus routes, or whether new riders are attracted to transit.”

20-136



The text on page 8-6-8 elaborates on this and further states that the “new daily transit trips” in column 3 is the appropriate measure to compare since this measure deals with linked (end-to-end) trips. Table 8-6.5 and text on page 8-6-8 show that the “biggest increase in transit ridership (13,000 to 15,000 daily new transit trips) results from implementing the Full BRT Alternative, which integrated service improvements assumed in the TSM Alternative.” In comparison, the Rapid Bus alternatives vary from 9,200 to 10,300 new daily transit trips, only a modest increase over the TSM’s new daily transit trips over No Build (9,000).

In addition to higher ridership, the BRT has certain features that the Rapid Bus does not have, which makes BRT a high capacity transit system. These include stations rather than stops, exclusive bus lanes, higher capacity buses, multiple door boarding and alighting, fare prepayment and feeder network. The scale, operation, and amenities provided at proposed stations for the BRT Alternative are similar to those provided at rail stations. Stations are located along dedicated ROWs and include amenities such as park-and-ride lots, transit vehicles with multiple doors for passenger loading, bicycle parking, and designated kiss-and-ride drop off locations. In comparison, Rapid Bus stops do not include any of these amenities. The difference between stations and stops is explained on page 8-4.1-1 of the Revised FEIR, which states “the scale and amenities provided at RB stops are similar to that of local bus stops.” Features that are common to both BRT and Rapid Bus include simple route layout, frequent headways, less frequent stops, level boarding and alighting, color coded buses and stops and signal prioritization (Please see Table 2-4: Busway Features Planned for the San Fernando Valley of the FEIR, and



Boardings” for the “Full BRT – Upper-Bound Estimate²⁸” to be 18,700²⁹ – which happens to be exactly identical to what is shown for the Victory Rapid Bus line in the RB-Network Alternative. If a Rapid Bus line is projected to produce ridership that is identical (actually, higher when the “local” bus ridership on Victory is added in) to that projected, in a similar manner, for the Orange Line, than how can Rapid Bus be “precluding” the construction of a high-capacity transit system?

210. As to being “inconsistent with the following plans,” this is, perhaps, the ultimate self-fulfilling prophesy – if you put something in the plan and then don’t do it, you are not following the plan – even if it turned out that you could accomplish the same intended result at far less cost. If transportation drives development – which appears to be the underlying assumption that these plan elements are based on – then, fine, putting a high-capacity transit system in a slightly different corridor should drive development there, to pretty much the same local and regional result, shouldn’t it? And, I assume the taxpayers will find a better use for the hundreds of millions of dollars that would be saved by not building an unnecessary busway – or, at least, their governments might find another use for these dollars.

211. How cannot a transit system that carries the same number or more people as the Orange Line not be rated the same way on this point?

212. It is notable that this is the only “Significant” impact for the Rapid Bus Alternatives in a 31-page (RS-12 to RS-42) table of impacts covering every topic that CEQA requires.

²⁸ Ignoring the Daily Transit Boardings for the thoroughly discredited “Lower-Bound,” 28.8-minute end-to-end run-time projection.
 If MTA had done a ridership projection for a 35-minute end-to-end run time – which, while somewhat questionable, is at least not laughable on its face – it would have undoubtedly been between the ridership projections for the “Lower-Bound” 28.8 minute run time and the “Upper-Bound” 40-minute run time. If I had to guess, I would say the ridership projection for a 35-minute run time would be closer to the Upper Bound projection than the Lower bound projection because 35 minutes is closer to 40 minutes than it is to 28.8 minutes. However, since MTA has not provided such a projection, it is impossible to make any comparison to it.
²⁹ Interestingly, from the review of the details of the MTA transportation model run for the RB-Network Rapid Bus line, it appears that the ridership is actually higher than 18,700 – namely, 21,900.
 I served a Public Records Act request upon MTA for this information, which is presented in Exhibit XVII for the various Alternatives. Turning to page 4 of the RB-network results, for line “782-WRNR CTR-NRTH HLLYWDY” (the leading digit “7” indicates a Rapid Bus line, and the full route name appears to be “Warner Center-North Hollywood Red Line Station,” so this appears to be the Victory Rapid Bus line) with “brdnrgs” (Boardings) of 18,670. The next line shows “164-VCJR/GILM-BRBNK/MTRL” (164 is the Victory Boulevard “local” line and the full route name appears to be “Valley Circle/Gilmore-Burbank Metrorail Station,” which are the terminal points of line 164-Victory Boulevard local) with 3,279 riders. The simple sum of the two Victory lines’ ridership would appear to be 21,949 and, following what appears to be the convention on Table 8-6.5 of rounding all ridership to the nearest 100’s, it would be reported as 21,900, an addition of 3,200 over what is reported in that Table.
 As is discussed in more detail at ¶ 428, there appears to be a number of inconsistencies between the data that MTA provided to me from reports that were specifically requested to contain the data reported in the DRFEIR.

20-136

20-137

20-138

20-139

Table 8.2-1: Metro Rapid Features of the Revised FEIR). Therefore, the Revised FEIR is correct in stating that the BRT is a high-capacity transit system while Rapid Bus is not.

Comment 20-137

The Land Use Sections of the FEIR and the Revised FEIR analyzed consistency of the Project and alternatives with applicable planning and zoning documents. If the Project would not be consistent with adopted plans and policies, a significant impact under CEQA would occur. Page RS-16, Table RS-32 of the Revised FEIR entitled, “Summary of Operational Impacts” states, “Amending these numerous plans would severely alter their objectives without any substitute objective that would curtail wide spread growth.” The analysis identified seven plans (not prepared by the MTA), which actually set forth direction for development to be concentrated around transit systems along transit corridors. As mentioned in response to Comment 20-136, a Rapid Bus route does not provide the same level of service as the Orange Line (BRT). Pages 8-4.1-40 through 8-4.1-55 describe the relevant plans and documents and pages 8-4.1-68 through 8-4.1-77 describe the consistency of each plan with the Rapid Bus Alternatives in the Revised EIR.

Moreover, as further shown hereafter, the RB Alternatives do not provide the focal point of concentrated growth envisioned by the plans. In 1986, the City of Los Angeles adopted its “Concept Los Angeles,” which called for the development of high-intensity centers linked together by rapid transit. (Concept Los Angeles, The Concept of the Los Angeles General Plan, City of Los Angeles, April 1974, p. 5.) This concept is now embodied in the Los Angeles



General Plan, adopted in 1996, which provides for transit-oriented districts around transit stations, with “transit stations [to] function as a primary focal point of the City’s development.” (FEIR, p. 4-34.) This planning concept is now referred to as “Smart Growth.” The concept is implemented by increasing the allowable development density generally within one-quarter mile of transit stations. (General Plan Framework An Element of the Los Angeles General Plan (LA General Plan), p. 3-35.) Furthermore, the policy set forth in the transportation element of the General Plan is to develop transit alignments and station locations that maximize transit service in activity centers. Development is in turn further encouraged in these targeted growth areas by allowing more intense development. (FEIR, p. 4-35.)

These transit-oriented districts accomplish two important goals. First and foremost is the objective to meet the urgent housing needs of the City’s growing population (LA General Plan, p. 1 of the Executive Summary, p. 4-2). These needs will be achieved “by encouraging future housing development near transit corridors and stations.” (LA General Plan, p. 4-2.)

Second, the transit-oriented districts will accommodate the growth while preserving existing single family, low-density neighborhoods. (LA General Plan, pp. 1 and 3 of Executive Summary.) The City concluded that a plan that accommodated growth across all neighborhoods would lead to congestion, air pollution, and the degradation of residential neighborhoods. (LA General Plan, p. 3-3.)

The RB Alternatives introduce numerous transit routes through the Valley that would not concentrate



development along limited corridors in the Valley. The RB Alternatives do not have transit stations, but merely bus stops that do not attract significant development. On the other hand, the Orange Line's stations provide an excellent opportunity to concentrate growth with the amenities of station areas and parking lots along a single route.

Comment 20-138

Please see response to comment 20-136.

Comment 20-139

It is correct that land use would be the only significant impact identified in the Revised FEIR for the Rapid Bus alternatives due to inconsistency with existing plans. The Full BRT Alternative also would have one significant impact. The Full BRT would have significant noise impact during construction. As stated on page RS-46 of the Revised FEIR, "although both the BRT alternative and the three Rapid Bus alternatives are relatively similar in that they result in only one unmitigated significant impact; the construction significant noise impact associated with the BRT Alternative would end at construction completion while the significant land use impact associated with the three Rapid Bus alternatives would be ongoing through the life of the land use plans."



213. The above comments also apply to Page RS-46, last paragraph.

214. **Page RS-38, Table RS-2: Summary of Operational Impacts, Fiscal and Economic Conditions (Section 5-6 and Section 8-5.6)** – Under “BRT” (Orange Line), we have, “Approximately 21,400-22,350 FTE³⁰ jobs generated,” which is rated, “Beneficial,” while for the three Rapid Bus Alternatives, we have, “A very small number of new construction jobs would be generated by the minor construction requirements,” which is rated “Not Significant.”

215. Let's get this straight -- spending hundreds of millions of dollars of taxpayer money is rated a good thing because it creates jobs, while *not* spending hundreds of millions of taxpayer dollars is *not* rated as a good thing?

216. This has nothing to do with the project having any purpose or value or not, this is simply about spending money to create jobs. Under this scoring methodology, hiring people to dig a hole in the ground, and then to fill in the hole, would have a higher score than not hiring anyone for this pointless exercise.

217. Why is the evaluation process structured to show that spending tax dollars, in and of itself, with no requirement for any purpose or need, is superior to *not* spending tax dollars?

218. I submit that the “scores” for this item reversed, that the Rapid Bus Alternatives be rated superior to the Orange Line Alternative because they *do not* require large expenditures.

219. By the way, at the current time, there is such a large over demand for construction workers in the Greater Los Angeles County area that construction prices are being significantly driven upwards and many projects are finding it hard to find qualified construction trade employees – in fact, we understand that MTA had significant problems finding subcontractors to restart construction on the Orange Line for exactly this reason.

220. **Page RS-47, RS-4 COMMENTS AND COORDINATION** – “An extensive public and agency outreach effort has been conducted from the initiation of environmental studies through completion of Preliminary Engineering, in order to identify and involve various stakeholders in the project. More than 200 meetings have been held and nearly 11,000 contacts are identified on the public outreach database.”

221. We must strongly protest the above and the rest of this section. There has been absolutely no process what-so-ever to gain public input into the DRFEIR – in fact, as detailed in my comments in my cover letter, MTA has refused to meet with COST on this matter, despite repeated communications asking for such meetings through numerous methodologies. During

³⁰ Full-Time Equivalent, which, in this context, generally means one full-time job for one year.

Comment 20-140

Please see response to comment 20-139 above.

20-140

20-141

20-142

20-143

20-144

20-145

Comment 20-141

The commenter’s concern is acknowledged for the record. Section 8-5.6 (*Fiscal and Economic Conditions*) of the Revised FEIR notes that “the minor construction activities could create a small number of job opportunities and result in a small beneficial impact to area employment.” The BRT Alternative and the three Rapid Bus Alternatives would result in beneficial impact in regard to job creation. No adverse impacts would result with these alternatives.

Comment 20-142

The commenter’s concern is acknowledged for the record. Section 5-6 of the FEIR and Section 8-5.6 of the Revised FEIR evaluated the environmental impacts associated with the Fiscal and Economic Conditions resulting from the BRT Alternative and the three Rapid Bus alternatives.

Section 6 of the FEIR and Section 8-6 of the Revised FEIR compare the financial effectiveness of the various alternatives.

Comment 20-143

The commenter miscites Table RS-2 at page 38 of the Revised FEIR as Summary of Operational Impacts for the Fiscal and Economic Conditions. This portion of the table is a “Summary of Construction Impacts.” As such, the FEIR appropriately considered the effect of construction of the RB Alternatives on fiscal and economic conditions. As the commenter points out in earlier comments, the greater the construction the



greater number of temporary construction jobs. On page 8-5-2, the Revised FEIR clearly explains that there would be very little construction for a RB Alternative and as a result, not many construction jobs would be created. The “score” of “Not Significant” for the RB Alternatives is consistent with the Revised FEIR analysis. Moreover, the high number of jobs created by the construction of the BRT warrants the “score” of beneficial. Changing the Revised FEIR to reflect the commenter’s suggestion would not make the RB Alternatives environmentally superior to the Orange Line. The RB Alternatives still create a significant impact on land use by inconsistency with land use planning policies of the City of Los Angeles, where the Orange Line does not. (Rev. FEIR, p. RS-16.)

Comment 20-144

There were no changes in the sub-contractors after project was restarted. When SOJV was notified to demobilize due to the court order, SOJV kept Sub-contractor’s supervisory level workers and laid off other workers. SOJV were able to re-hire approximately 50% of the original work force. SOJV replaced approximately 30% to 45% of the approximately 50% workers that were laid off.

Comment 20-145

The first paragraph of Section RS-4, “Comments and Coordination” is clearly dedicated to the public outreach that was associated with the FEIR. This paragraph explains that the extensive public and agency outreach began at the “initiation of environmental studies through competition of Preliminary Engineering...” It goes on to note that this outreach was memorialized in the FEIR. The second paragraph of this Section is devoted entirely to the Revised FEIR. Accordingly, MTA did not



the outreach and comment process that produced the FEIR. MTA simply refused to engage in any meaningful discussion regarding Rapid Bus, so the Rapid Bus portion of the outreach process for this original FEIR consisted of various parties asking MTA to consider Rapid Bus as an Alternative and MTA refusing to do so. Since then, the outreach process has been to totally ignore all requests to have input. The response to my first letter was to refuse to meet and there was no response to my second letter at all.

222. Why has MTA refused to have any outreach at all on Rapid Bus as part of the DRFEIR process, not even providing a meaningful response to requests to meet or to technical points?

223. Page RS-48 – “In the recent past, an increasing number of San Fernando Valley organizations and individuals have argued that the Valley taxpayers ‘are not getting a fair share’ of the transit projects. Stakeholders believe that they have little to show for their portion of sales taxes, which were supposed to be used for building a rapid transit system in the San Fernando Valley. They feel that while the MTA has been studying concepts for the Valley, other areas of the county have already obtained subway and/or other rapid transit systems or are closer to getting improved transit. In addition to recently completed Metro Red Line service to North Hollywood, implementation of the of the San Fernando Valley East-West Transit Corridor project will be a substantial improvement to transit service in the Valley and a major step forward to satisfying the stated shortcoming.”

224. The above is, of course, discussing the revenues from the two one-half cent general sales taxes implemented after the voters approved Los Angeles County Propositions A of 1980 (Los Angeles County Transportation Commission Ordinance 16) and C of 1990 (LACTC Ordinance 49). There is a very easy way to address this question – what are the Proposition A and C tax receipts from each sub-area of the County, and expenditures from these funds, since these sales taxes were imposed? In doing this analysis, the “Local Return” funds (nominally 25% of Proposition A and 20% of Proposition C collections) should be disregarded, as these funds are allocated to each city (or County Supervisor for unincorporated areas of the County) and MTA has virtually no control over such expenditures, other than a responsibility to ensure that the individual city or Supervisor does not expend such funds for improper purposes.

225. Actually, if one takes a look at what the Valley has received from expenditures of Proposition A and C funds, the list is very impressive, including (while there is at least some Proposition A or C funding in each of the following, there are also other funding sources utilized):

SIGNIFICANT CAPITAL PROJECTS:

- The Red Line to North Hollywood

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mischaracterize its public outreach efforts. See Response to Comment Nos. 14-10 and 20-11 through 20-11 for discussions on consultation concerning the Revised FEIR.

Comment 20-146

Metro does not perform or receive any type of geographical breakdown for the Proposition A and C sales tax receipts. The annual budget for Fiscal Year 2005 for Metro does identify certain statistics by Service Sectors of the County of Los Angeles as reflected on pages III-4 and 5. The actual expenditures authorized in the budget are shown in what is a “Combined Statement of Revenue, Expenses and Changes in Retained Earnings” and is reflected on page IV-4 for the Enterprise Fund, which depicts the adopted operating budget of Metro bus and light rail as a whole.

The State of California Board of Equalization collects the local sales tax funds referred to as A and C on behalf of Metro and the collected funds are disbursed to Metro on a regularly scheduled basis. Metro does not segregate the funds into sub-areas of the County of Los Angeles but rather manages and reports the funds on a countywide basis. Likewise, disbursing the funds is completed in accordance with the adopted budget and directives of the Metro Board of Directors as duly and statutorily constituted on a countywide basis, except for the funds directed to local cities or the county on a population basis and the sales tax propositions themselves. All reporting and accounting for Metro financial activities are done to conform to governmental accounting, auditing and financial reporting laws referred to as “*Generally Acceptable Accounting Practices.*”



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- HOV Lane/Busways constructed and/or planned in the Valley proper and/or leading directly to and from the Valley on the I-5, I-405, CA14, CA101, CA118, CA134, and CA170 – in fact, every freeway in the Valley (with the important exception of CA101)
- Two Metrolink lines through the Valley from the Los Angeles CBD to Ventura County and North County
- Renewal, replacement, and expansion of the MTA bus fleet and those of other operators serving the Valley, including LA-DOT DASH and Commuter Express, Antelope Valley Transit Authority, and Santa Clarita Transit
- Capital renewal, replacement, and upgrade and expansion of bus transit operating facilities
- Demand-response/Americans with Disabilities Act transit vehicles

TRANSIT OPERATIONS:

- MTA Bus and Red Line service
- Metrolink service
- Bus services of LA-DOT DASH and Commuter Express, Antelope Valley Transit Authority, and Santa Clarita Transit
- Demand-response/Americans with Disabilities Act transit services
- Freeway Service Patrol²¹

TRANSPORTATION PLANS – All that one has to do is to read FEIR pp. 2-2 through 2-14 and count the transit guideway projects *alone* for the Valley and there can be no question that Valley has received a major share of the MTA planning activities.

226. There is no doubt that, on a per capita basis, some areas of the County have “done better” than the Valley, most notably the CBD – which has, arguable, received the largest share of such funding sources of any County subarea, while it has relatively few residents in the central core. Against virtually all other subareas of the County, I might speculate that the Valley has done very well, certainly considerably better than many subareas. However, considering that the big winner, the LA CBD, has received primarily expenditures to bring County residents who live in other areas *to* the CBD, it is hard to argue that residents of the Valley do not receive a benefit from them. Indeed, it appears that Valley residents are close to the majority, if not an actual majority, of Red Line riders, the single most expensive investment that MTA and its predecessor organizations have ever made, and counting expenditures to build the segment “over the hills” on the South side as having no value to Valley residents would appear rather illogical. I might add that Valley residents are also among the prime beneficiaries of the “flat” fare on MTA rail lines,

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²¹ While there is considerable question if FSP is “transit,” there is no doubt that is paid for with Proposition C funds.



which allows them to travel all the way downtown to the end of the Red Line for the same cost as riding two blocks down the street on a MTA bus, a most considerable benefit.

227. I doubt if anyone would dispute that a major reason why the Valley has not seen more large-scale capital investments is that the Valley has been very divided as to which investments should be pursued, and how. This is understandable because the unique Valley transportation situation – “everyone going everywhere” – without a core CBD makes high-capacity, expensive transit guideway projects far less valuable in the Valley than elsewhere in the County, even if one believes that they are of value elsewhere in the County.

228. It is certainly true that the East-West Valley Subway (Red Line) was promised, but never built. For this, we should all be truly grateful, as it would have been an extremely expensive project – well into the billions of dollars – with very little ridership or purpose other than the pure expenditure of public sector dollars for its own sake. This leads into a key point that the DRFEIR discussion appears to totally ignore – it is *not* a good thing to spend tax dollars in an attempt to “equalize” spending if there is no purpose for such expenditures. Spending money to spend money is a bad policy, particularly with taxpayer dollars.

229. Page RS-48, third paragraph – “Section 130265 has been determined to not be applicable to the currently proposed busway project.” It might be more precise to say that MTA legal counsel (County Counsel) has rendered such an opinion. There is, to the best of my knowledge, no definite legal order on this issue and the opinion of County Counsel is not universally shared.

230. Page 8-1-1, 8-1.1.1.2 Growth and Development Trends – “Los Angeles County is the most populous county in California. The County is estimated to currently have about 9.8 million residents, and is anticipated to have approximately 12.3 million residents in 2020—representing 27 percent growth over 20 years.”

231. Please refer to Exhibit XIX, State of California – Department of Finance – Demographic Research Unit – “New State Projections Show 20 Million More Californian by 2020, Hispanics to be State’s Majority Ethnic Group by 2040,” May 19, 2004, which was obtained from the DMU web site at:

<http://www.dof.ca.gov/HTML/DEMOGRAP/whatsnew.htm>

232. DRU is the unit of State government that performs official population projections and research.

233. In this document, please reference Table 1, “Total Population,” where the following population projection may be found for Los Angeles County: 2020 – 10,885,092.

20-146

Comment 20-147

The commenter’s dissent with MTA’s determination that Section 130265 is not applicable to the Orange Line is acknowledged. The commenter makes the same comment at Comment No. 31-39. See Response to Comment No. 31-39 for further discussion on the reasoning why Section 130265 is not applicable. MTA is not aware of any court order pertaining to this Section that is directed at MTA.

20-147

Comment 20-148

The Purpose and Need in the Revised FEIR is repeated from the FEIR for context. The alternatives considered in the Revised FEIR were evaluated with the same population base as the FEIR. This section was prepared using population projections from Southern California Association of Governments’ (SCAG) 1998 Regional Transportation Plan. The Notice of Preparation (NOP) was released in May 2000. At the time of its release, the population projections used were the best available data from SCAG whose projections are the only regionally accepted projections to use.

20-148



234. From the starting point in the above citation of 9.8 million, this is growth of approximately 1.1 million people, rather than 2.5 million – or approximately 44% of what MTA states.

235. While it is my understanding that the Southern California Association of Governments, the Metropolitan Planning Organization for the MTA region, has not yet conformed to this estimate, there appears to be extremely widespread acceptance of the underlying reasons for this very significant downward adjustment in population projections in the demographic community, as evidenced in the two newspaper articles (Daryl Kelly, "California Cuts Its Population Projection – The State is reconsidering the demands for new schools and other services primarily because of an unexpectedly large decline in the Latino Birthrate," *Los Angeles Times*, October 4, 2004 and Beth Barrett, "Population forecast falls – Drop in Latina fertility rates signal shift," *Los Angeles Daily News*, October 4, 2004, also in Exhibit XIX) and it appears simply a matter of time before this revised projection, or one very close to it, is adopted formally.

236. Page 8-1-12, 8-1.1.3.2 Goals and Objectives b. Major Transit Projects Under Development – This is very obviously out-of-date; as it shows the Rapid Bus Program as a two-line demonstration program – rather than the current nine line implemented, total of 24 lines adopted, the Pasadena Gold Line as under construction (it opened in July 2003); and the Eastside Transit Corridor DEIR as recently released – construction is now underway. This section requires updating to reflect the current situation, particularly the extreme success of the Rapid Bus program to date which has led to it becoming a major component of the entire MTA transit service improvement plan.

237. Page 8-1-14, Table 8-1-6: Existing and Projected Travel in the San Fernando Valley, Page 8-1-15, Table 8-1-7: AM Peak-Hour Demand vs. Capacity, 1998 and 2020, and Page 8-1-16, Figure 8-1-5: Comparison of Traffic Demand and Capacity, 1998 and 2020 – These Tables and Figure are obviously based on the older population projections that have since been significantly revised downward, as discussed on the comment on page 8-1-1 above. With population growth for the County of approximately 44% of what was originally projected, the 2020 data shown on these tables requires substantial revision. Undoubtedly, every measure will require substantial downward revision.

238. With the population growth so much less than had been originally projected, the negative impacts of such growth on travel will be very much less significant. This change in population projection is far too large to ignore, assuming that there is a desire to produce meaningful data for analysis in this DREIR.

239. Page 8-3-14/15, 8-3.3.1.1 Transit Vehicle Conflicts with Mixed-flow Traffic – "Typical bus operations do not cause significant traffic impacts. However, Rapid Bus operations are not the same as typical bus operations in that Rapid Buses are added to streets that already contain local and limited levels of typical bus operations, which further increases the buses on the street, which causes some slowing of existing traffic."

20-148

Comment 20-149

As stated previously in response to comment 20-148, the Purpose and Need in the Revised FEIR is repeated from the FEIR for context. In order to make a fair comparison, the analysis was prepared using year 2000 data when the NOP was released. The state of completion of the major transit projects under development in 2000 listed would not have any effect on the relative evaluation of the Rapid Bus alternatives, either between themselves or with the Full BRT alternative, in the Revised FEIR.

20-149

Comment 20-150

Please see Response 20-148.

20-150

Comment 20-151

With one exception, the Wilshire corridor, all Metro Rapid corridors are planned with no net increase in buses operated. As stated in the February 2002 Metro Rapid Board Report, Metro Rapid lines will be planned and designed to be operating cost neutral. The impacts of Metro Rapid on existing vehicular traffic, therefore, is insignificant in most cases and, as Tom points out, an improvement in other cases.

20-151

The commenter notes that Rapid Buses have fewer stops per mile than local buses and shuttles, typically have far side stops which do not hinder right turns as much as near side stops, and that some drivers have learned to take advantage of the transit signal priority afforded to Rapid Buses by keeping pace with the buses. These comments are all acknowledged for the record as examples of the positive effects of the MTA Metro Rapid Bus Program.



240. First, the greatest impact of buses upon other traffic on surface streets is stops to discharge passengers. Since Rapid Bus is designed to have far fewer stops than local service – typically, approximately one stop every mile for Rapid Bus service vs. four to six stops per mile for local bus service and up to every block for shuttle bus service, such as DASH – its negative impacts on surface traffic from stops for passenger boarding/deboarding tend to be less than local and shuttle bus service.

241. Also all Rapid Bus stops are “far side” stops, meaning that they are placed on the far side of traffic signals. Such placement of stops tends to be less disruptive of other surface traffic than near-side stops. For example, when a bus is stopped at a near-side stop, it can be difficult or impossible for other vehicles to make right turns on red. If the traffic signal is “green” when a bus is stopped for a near side stop, the curb lane is blocked to right turns – which does not happen when a bus is stopped at a far side stop – as well as to thru traffic.

242. Many local drivers on Rapid Bus streets such as Wilshire have actually learned to use Rapid Buses to help them get through signalized intersections. These drivers know that there is a good chance that, if they follow or keep pace with a Rapid Bus, they will receive a series of “green” lights.

243. Rapid Bus traffic signal improvements can include changes to the signal progressions, and LA-DOT, working with MTA, has actually done this on Wilshire Boulevard (for Rapid Bus line 720) and Washington (for the Long Beach-Los Angeles Blue Line). Sean Skehan, Senior Transportation Engineer, Advanced Transportation Management Systems, LA-DOT, informed me that the Wilshire signal progression changes for Rapid Bus actually produced a small increase in flow for other vehicles.

244. In almost all of its Rapid Bus implementations to date, MTA has not simply added Rapid Bus service to the existing local bus service, it has shifted the mix by reducing the number of buses assigned to local and limited stop. When a slower, local or limited stop bus is replaced by a faster, Rapid Bus, this is an improvement in traffic flow for other vehicles on the street. (See Exhibit 20, “MTA – Pre- and Post-Rapid Bus Conversion – Number of Vehicles Assigned, AM Peak Period.”)

245. However, the most obvious impact of adding Rapid Bus service is that, the more people that are attracted to Rapid Bus due to its improved service, the fewer people who are going to be in private automobiles – including, very commonly on the same street at the same time. This is *not* to claim that every Rapid Bus user formerly drove alone on the same route at the same time, but there is most certainly a single-occupancy-automobile-to-Rapid-Bus factor at work when Rapid Bus is properly implemented with attracting new riders and saving travel time for existing riders as the primary objectives (as opposed to cost reduction, which has, unfortunately, appears to be

Comment 20-152

True, signal progression improvements made along Wilshire and Washington Boulevards have produced a small improvement in overall traffic flow for regular traffic as well.

20-151

The comment by Sean Skehan of LADOT regarding the positive effects of the Metro Rapid Bus Program on overall traffic flow is acknowledged for the record.

Comment 20-153

This observation is acknowledged for the record.

Comment 20-154

The analysis included in the FEIR and the Revised FEIR does reflect the fact that traffic volumes on many streets are lower in the future with the BRT and Rapid Bus Alternatives due to the mode shift of some travelers from auto ridership to bus ridership. These differences are reflected in Table 8-3-6 where background traffic volumes are generally shown to grow less by 2020 with the transit alternatives in place than under the No Build scenario. Please also see Response to Comment No. 20-30. In response to commenter’s questions, MTA does not believe that general traffic flow has been measurably affected by its implementation of Rapid Bus routes to date.

20-152

20-153

20-154



the primary objective of how MTA has been implementing Rapid Bus service in the most recent lines).

246. MTA's statement above appears to be saying that implementing Rapid Bus can cause traffic conditions to worsen. What evidence does MTA have of such events from the nine Rapid Bus lines that it has implemented to date? (Note: While we are aware that the "dedicated bus lane" project on Wilshire near the San Diego [I-405] Freeway has produced measurable problems in other surface traffic flow, this is *not* a Rapid Bus project, even though Rapid Bus route 720 buses do use the exclusive lane. However, by definition, a project with an exclusive bus lane is Bus Rapid Transit, like the Orange Line.) Does MTA have any evidence of implementing Rapid Bus and seeing improvements in traffic flow, such as those I have included above?

247. Page 8-3-15, 8-3.3.1.3 Transit Priority Treatment at Signalized Intersections – "Based on data collected on MTA's Wilshire Boulevard and Ventura Boulevard Rapid Bus demonstration projects, it was determined that those Rapid Buses were operating at improved speeds 20 percent faster than the standard buses on those routes as a result of transit signal priority and fewer stop locations. The travel demand forecasting model used to predict ridership on the three Rapid Bus alternatives used the 20 percent speed improvement for all Rapid Bus routes in the model assignments, but in reality this 20 percent improvement is likely only to be achieved on Victory Boulevard. For other east-west Rapid Bus routes something less than the 20 percent bus speed improvement is more likely. Most of the east-west Rapid Bus routes are more likely to achieve speed improvements of 10-15% over standard bus routes."

248. First, the operating speed improvement on other Rapid Bus lines appears to be larger than the 20% MTA claims above. In *Final Report – Los Angeles Metro Rapid Demonstration Project*, July 2001 (Exhibit XII, 53 AR 12742-806), page iii, "Objective 1: Reduce Passenger Travel Times," it states:

"Since the initial date of service, Metro Rapid Operation has achieved the following improvements in operating speeds:

- Wilshire/Whittier Corridor – operating speeds increased by 29%
- Ventura Corridor – operating speeds increased by 23%"

249. Second, since the publication of that report (approximately one year after the commencement of service on first two Rapid Bus lines), there have been further improvements to speed. At a meeting of the MTA Citizens Advisory Board on May 26, 2004, Rex Gephart, the "father" of Rapid Bus at MTA, spoke on Rapid Bus and stated that the Line 720 Rapid Bus service on Wilshire was then operating 29% faster than the former *limited stop* service on Wilshire, which was itself significantly faster than the local service. (This statistic did *not* include the speed increase from the exclusive bus lane on Wilshire near I-405, described above.)

20-154

20-155

Comment 20-155

Two issues. First, as opposed to what Tom states, limited stop service is not "significantly faster than the local service". For example, the limited and local stop services on the Vermont and Soto corridors prior to the implementation of Metro Rapid service were scheduled with nearly identical travel times. Second, the range of travel time improvements for the nine existing Metro Rapid corridors is currently between 17% (Van Nuys) and 29% (Wilshire).



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250. Third, the City of Los Angeles has announced plans for its "Street Smart" program to speed up traffic (See Exhibit XXII). As the press release from Mayor James K. Hahn's office, October 4, 2004, states, in the second bullet, "Retiming of traffic signals to eliminate bottlenecks and improve progression." The list of the 35 Street Smart roads includes the following San Fernando Valley East-West arterials that we recommend be considered for Rapid Bus service: Roscoe Boulevard and Victory Boulevard.

251. Also, in Exhibit XXII, please note the Sharon Bernstein, *Los Angeles Times* story of October 5, 2004 on this program – the headline says it all: "Los Angeles: Hahn Unveils Plan to Speed Traffic Flow: Stoplights on 35 L.A. streets will be reset in a move he predicts will save drivers 8.4 million hours a year. *Victory Boulevard is to be first.* (Italics added)"

252. Does MTA agree that the impact of the traffic signal progression improvement program will improve bus speeds in the Valley? Does MTA agree that, although this program will improve all street-running bus speeds, this program will provide a greater benefit to Rapid Bus lines than local bus lines? Does MTA agree that the impact of this program on Victory Boulevard, the first Street Smart street to be implemented, will provide significant speed improvement benefits to Victory Boulevard Rapid Bus service and that, while there may be some benefit for Orange Line buses for that relatively short portion of the Orange Line that operates alongside Victory, the Street Smart speed improvements for Rapid Bus on Victory will exceed those for the Orange Line? Has MTA performed, or know of, calculations of the amount of improvement in bus travel time that could be expected from this program, particularly on specific streets, and, if it does, what are they?

253. Fourth, the estimate above appears to overestimate the importance of the limited traffic signal priority in saving time for Rapid Bus lines. While it is certainly a valuable tool and does help reduce run times, in the real world of operating buses on the street, it is actually not really used all that much – certainly nothing remotely approaching every traffic signal.

254. To gain a rough idea of how much bus operating speeds can be improved without traffic signal priority, I performed an analysis of MTA limited stop bus service times vs. comparable local bus service times. As a general rule, limited stop bus service has one stop approximately every half mile and Rapid Bus service has one stop approximately every mile. Also, while the one-stop-approximately-every-mile rule for Rapid Bus is fairly consistently applied, it is common for limited stop bus service in the CBD to stop at all bus stops on their "parent" bus lines. Limited stop service does not generally utilize "far side" bus stops as frequently as does Rapid Bus service. Of course, Rapid Bus has limited traffic signal preference, while limited stop service does not. All of these factors mean that, all else equal, Rapid Bus service will be significantly faster on any particular bus route alignment than limited stop service.

255. Does MTA agree with these above conclusions regarding the comparative speed advantages and results of Rapid Bus vs. limited stop service?

Comment 20-156

Please see Response 20-25.

Comment 20-157

Please see Response 20-25.

Comment 20-158

Please see Response 20-25.

Comment 20-159

Limited stop bus service has an average stop spacing of approximately 0.3 miles, systemwide. Metro Rapid has an average stop spacing of approximately 0.7 miles. Therefore, all else equal, Metro Rapid service will be faster than limited stop service.

20-155

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20-159



Comment 20-160

Please see Response 20-25.

256. Exhibit XXIII contains MTA Bus Schedule information for limited stop bus lines that share routes with regular local service. My sample design was simplicity itself: I went to the MTA "Bus and Rail Timetables – Metro Bus Lines 302-394" (In the MTA bus route numbering system, all limited lines begin with "3") and printed the schedules for the first five limited lines on the list that shared a route with a regular local line (which meant excluding Line 305, which does not). I then found the limited run that began closest to 7:30 a.m. in the morning weekday peak, found the comparable local bus trips before and after the limited run (where possible) between comparable time points as distant as possible, and computed the times for both the limited and the average of two local runs, producing the following schedule:

Line	Minutes			
	Limited Run Time	Local Run Times	Savings	% Speedup ³²
2/302	57	67	10	18%
4/304	49	(54+55)/2 = 54.5	4.5	11%
212/312	51	62	11	22%
115/315	44	57	13	30%
16/316	14	(27+26)/2 = 26.5	12.5	89%

257. As we can see from the above table, it does not appear all that difficult, judging from MTA's own published schedules, to produce scheduled time savings of 10-15% – the "more likely speed improvement" MTA projects – by limited stop techniques alone, even if there were traffic signal priority benefits available at all. If we take the above five examples – which were picked by an arbitrary selection method without any attempt what-so-ever to create an unfair sample – and even exclude the rather remarkable result of the 16/316 comparison, the simple average percentage speed increase for the other four examples is slightly over 20%.

258. Therefore, even if the limited traffic signal priority feature of Rapid Bus was of less utilization in Valley East-West bus lines than on other MTA Rapid Bus routes, a 20% speed increase of Rapid Bus over local bus service – or more – does not really appear to be at all out of the question.

259. Does MTA agree with the above analysis and its conclusion? If not, why not? If any part of MTA's response contains language to the effect that MTA's schedules cannot be utilized for such comparisons, there are two follow-up questions: (a) If MTA schedules cannot be utilized to

³² The metric in the DRFEIR section above is "improved speeds." To calculate this metric from run times between comparable points in percentage terms, divide the longer local run time by the shorter limited run time and subtract 1. For example, if a local bus takes 60 minutes between a common set of time points as a limited bus that takes 50 minutes, the calculation is (60/50) - 1.20 - 1 = .20 = 20%. Therefore, the limited stop bus must have an average rate of speed 20% faster than that of the local bus to cover the same distance in the specified times.

20-160



determine when transit vehicles will appear at specified timepoints, then exactly what purpose are such schedules intended to fulfill?, and (b) Please provide a list of all other MTA documents that cannot be relied upon, specifically including those portions of the DRFEIR and documents utilized in its preparation.

260. Is the MTA extreme pessimism over Rapid Bus operating speed improvements driven by real concerns or by a reluctance to see something so (relatively) simple and inexpensive to implement – which is, to a very large extent, an invention of MTA’s – succeed if it makes the favored Orange Line Alternative look less desirable?

261. Page 8-3-16, Table 8-3-5: BRT and Rapid Bus Alternatives Auto Mode of Access Description – This table shows that between 2,897 (Upper Bound) and 3,297 (Lower Bound) people will access the BRT every working weekday through the Park & Ride lots. As this appears to be the count of people, not trips (note that the “Park & Ride” counts are relatively close to the “Total Lot Capacity,” so, unless we assume that MTA is building significant excess parking capacity for no reason, this appears to be counting travelers, which will be somewhat more than cars, because some cars will bring multiple riders to the Park & Ride lots), it is probably fair to almost double this count for the number of trips that will be taken by the Park & Ride users, producing a count of trips that are taken by Park & Ride lot users of approximately 5,000 to 6,500.

262. It is interesting to note that the Park & Ride Auto Split for all three Rapid Bus Alternatives is zero, indicating that there will be no Park & Ride access to Rapid Bus in the Valley because, one assumes, there will be no Park & Ride lots usable by Rapid Bus passengers. This is a system-design result, meaning that the reason that the existence of Park & Ride lots for Orange Line passengers has a lot to do with 5,000 or more trips a day, but there will be no Park & Ride passengers on Rapid Bus because MTA has decided it will not provide any Park & Ride lots for Rapid Bus passengers.

263. This is remarkable for many reasons, the chief among them being that there are Park & Ride lots planned – under construction – for the Orange Line that are located directly on potential Rapid Bus lines and would be almost as usable for Rapid Bus passengers as for Orange Line passengers. Referring to the FEIR, Table 2-6: Station Attributes (Full BRT Alternative), we have the following Park & Ride lot facilities, from West to East:

- A. At Pierce College Station (Mason Avenue/Winnetka Avenue), there is a 100-389 space Park & Ride lot. The parking lot will be located between the Busway to the North and Victory Boulevard to the South. There is a Victory Rapid Bus line in all three Rapid Bus Alternatives and the Victory Rapid Bus line runs right by this location and there is a Rapid Bus stop shown at Victory and Winnetka. Why could this Orange Line Park & Ride lot not be used as a Rapid Bus Park & Ride lot?

Comment 20-161

This comment does not address a specific environment impact of the potential alternatives, but it is acknowledged for the record.

20-160

Comment 20-162

The RB Alternatives were developed in accordance with the policy by which Rapid Bus routes have been implemented by the MTA elsewhere in Los Angeles County. They have not been implemented with park-and-ride lots. In the Revised FEIR, there was also an attempt to compare the alternatives as they would have been compared in the FEIR. At that time, park-and-ride lots were not under construction and were not considered an element of the Metro Rapid Bus program which was intended to implement fast, high quality bus service with low-floor buses, signal priority at intersections, streamlined on-street boarding and alighting of passengers, and improved bus stop spacing. Moreover, the RB Alternatives would not utilize a BRT park-and-ride lot if the BRT is not built in favor of a RB Alternative. The cost of constructing park-and-ride lots was not included in the cost of constructing or maintaining any of the RB Alternatives. Thus, it would be inappropriate to include the benefit of BRT facility with any RB Alternative.

20-161

20-162



- B. At Reseda Boulevard, there is a 534 space Park & Ride lot. In RB-Network, there is a Reseda Rapid Bus line. There is no stop indicated at the location of this Park & Ride lot, but adding a stop at this location does not appear to be very difficult. Why could this Orange Line Park & Ride lot not be used as a Rapid Bus Park & Ride lot?
- C. At Balboa, there is a 285 space Park & Ride lot shown. The Victory Rapid Bus line found in all three Rapid Bus Alternatives runs by this location and there is a stop indicated here. Why could this Orange Line Park & Ride lot not be used as a Rapid Bus Park & Ride lot?
- D. At Sepulveda, there is a 1,210 space Park & Ride lot shown. In RB-Network, there is a Sepulveda Rapid Bus line. There is no stop indicated at the location of this Park & Ride lot, but adding a stop at this location does not appear to be very difficult. Why could this Orange Line Park & Ride lot not be used as a Rapid Bus Park & Ride lot?
- E. At Van Nuys, there is a 981 space Park & Ride lot shown. In RB-Network, there is a Van Nuys Rapid Bus – in fact, there is a Van Nuys Rapid Bus line operating right now, although not on the same route as the RB-network Van Nuys Rapid Bus line. There is no stop indicated at the location of this Park & Ride lot, but adding a stop at this location does not appear to be very difficult. Why could this Orange Line Park & Ride lot not be used as a Rapid Bus Park & Ride lot?
- F. At the North Hollywood Red Line station, there is an existing 915 space Park & Ride lot. All three RB-3 Rapid Bus lines serve this station, four of the five RB-5 Rapid Bus lines (all but Sherman Way) serve this station, and the RB-Network Victory Rapid Bus line serves this station. Here, it is not a question of, why can't this Park & Ride lot be used as a Rapid Bus Park & Ride lot, it is a question of how it could possibly be prevented? Yet, Table 8-3-5 discussed above shows no – zero – Park & Ride Auto Access for all three Rapid Bus Alternatives, which simply makes no sense. Did MTA make a conscious decision to develop model rules that would not "allow" Rapid Bus passengers to Park & Ride at this location, or is there some other explanation for this extremely illogical result?

264. Finally, I refer you to Exhibit XXIV, the Metro Orange Line August 2004 Monthly Project Status Report, specifically "Management Issues," page 2, "Concern No. 2 Park-and-Ride site at Metro Orange Line's western terminus in Warner Center," which states:

265. "The western terminus at the Warner Center Transit Hub does not currently include parking for Orange Line Project patrons. In February 2004, the MTA Board approved proceeding with negotiations to purchase the Boeing site identified, as the MTA Board preferred option for a park-and-ride site. MTA staff continues to develop a "construction only" procurement package for the park-and-ride scope of work, which includes extending the busway to the new station at the park-and-ride location. As requested by LADOT, LABOE and Councilman Zine's office, the MTA has tentatively agreed to include the widening of Conoga Avenue as part of the Project provided that the City pays the cost of construction. Subject to City Council approval, the widening, which is included in the latest zoning plan, may be funded as part of the Warner

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20-167

20-168

Comment 20-163

Please refer to response to comment 20-162.

Comment 20-164

Please refer to response to comment 20-162.

Comment 20-165

Please refer to response to comment 20-162.

Comment 20-166

Please refer to response to comment 20-162.

Comment 20-167

Please refer to response to comment 20-162. It is correct to note that many of the Rapid Bus routes in the alternatives serve the North Hollywood Red Line station, where a park-and-ride lot is included in the travel demand model. In theory, the model could have assigned some park-and-ride access to the Rapid Bus routes, which serve that location, but it was already at capacity based on the park-and-ride demand for the Red Line itself.

Comment 20-168

Please refer to response to comment 20-162. It is correct to note that many of the Rapid Bus routes in the alternatives serve the North Hollywood Red Line station, where a park-and-ride lot is included in the travel demand model. In theory, the model could have assigned some park-and-ride access to the Rapid Bus routes, which serve that location, but it was already at capacity based on the park-and-ride demand for the Red Line itself.



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Center Specific Fund. Staff continues to prepare an Addendum/Modified Initial Study for the development of a satellite surface parking-and-ride lot on MTA-owned property just north of the Boeing property to augment parking to be provided at the Boeing site. MTA staff will request adoption by the MTA Board of the satellite EIR in the near future³³.

266. There is no detail as to the number of spaces in this lot, but it is located close to Victory and Conoga. Each of the three Rapid Bus Alternatives includes a Victory Rapid Bus line that will pass directly by this location. There is no stop indicated at the location of this Park & Ride lot, but adding a stop at this location does not appear to be very difficult.

267. Why could this Orange Line Park & Ride lot not be used as a Rapid Bus Park & Ride lot?

268. If some – or all – of these “Orange Line” Park & Ride lots were utilized as Rapid Bus (and local bus) Park & Ride lots, what would the impact on Rapid Bus ridership be? If a Rapid Bus Alternative were to be selected over the Orange Line Alternative for implementation, then what would MTA intend to use these Park & Ride lots – which, for the most part, are on land that MTA already owns and, in many cases, are well into construction?

269. Pages 8-3-17/9, Section 8-3.3.2.1 Intersection Traffic Impacts – Traffic Forecast Methodology and Table 8-3-6: Growth Percentage for Base Traffic Volumes – On the Table, we see a range of base traffic volumes for the various alternatives from 24.0% to 35.0%, and there is a discussion of the implications for traffic congestions and speeds.

270. It appears that the main driver of these projected increases is the expected growth in population. As discussed above at page 8-1-1, the 2.5 million Los Angeles County population increase over the base population utilized in the FEIR has been reduced to a 1.1 million increase in the May 2004 State of California Department of Finance Demographic Research Unit projection. The values in this Table should be reduced to be consistent with the best available population projections.

271. Does MTA intend to revise this Table and this analysis to conform to the most recent and relevant information regarding expected population trends? If not, why not?

272. Page 8-4.1-1, 8-4.1.1.2 Existing Land Use Patterns – “The scale and amenities provided at RB (Rapid Bus) stops are similar to that of local bus stops. For comparison, the scale, operation, and amenities provided at proposed stations for the BRT alternative are similar to those provided at rail stations. Stations are located along dedicated ROWs and include amenities

³³ Although the environmental clearance has not taken place, reference to the “Project Cost Status” on page 9 shows, for “Proposed Park-and-Ride Facility,” an “Original Budget” of \$16.5 million, an “Current Budget” of \$16.5 million, a “Previous Forecast” of \$20.8 million, a “Current Forecast” of \$20.8 million, a “Forecast Variance” of \$(3.8) million, “Commitments” of \$9.0 million, and “Expenditures” of \$3.6 million.

20-168

Comment 20-169

If park-and-ride lots were included at some of the stations on the RB alternatives, this could result in some additional ridership on those lines, but the magnitude is hard to predict. Park-and-ride access links to bus stops have not typically been included in the MTA model and where they have been coded (e.g., at park-and-ride lots served by express buses) the level of park-and-ride access to bus services has typically been minimal. If the MTA Board were to select a Rapid Bus alternative in lieu of the Orange Line, the Board would be asked to determine the preferred disposition of the park-and-ride lots referenced.

20-169

Comment 20-170

Please refer to response to comment 20-31.

20-170

Comment 20-171

MTA understood that the Rapid Bus alternatives requested were to be low cost and have amenities similar to the current Rapid Bus route constructed on Ventura Boulevard. As park-and-ride lots are not normally constructed with Rapid Bus, these were not included.

20-171

Providing only limited amenities in the RB alternatives maintained a low capital cost and improved the cost effectiveness of these alternatives. MTA could include as a part of RB alternatives more amenities such as bicycle parking and street trees (although sidewalk width at stations is constrained in many locations). However, increasing amenities at Rapid Bus stop locations would increase the capital cost and negate an important positive feature of Rapid Bus.

