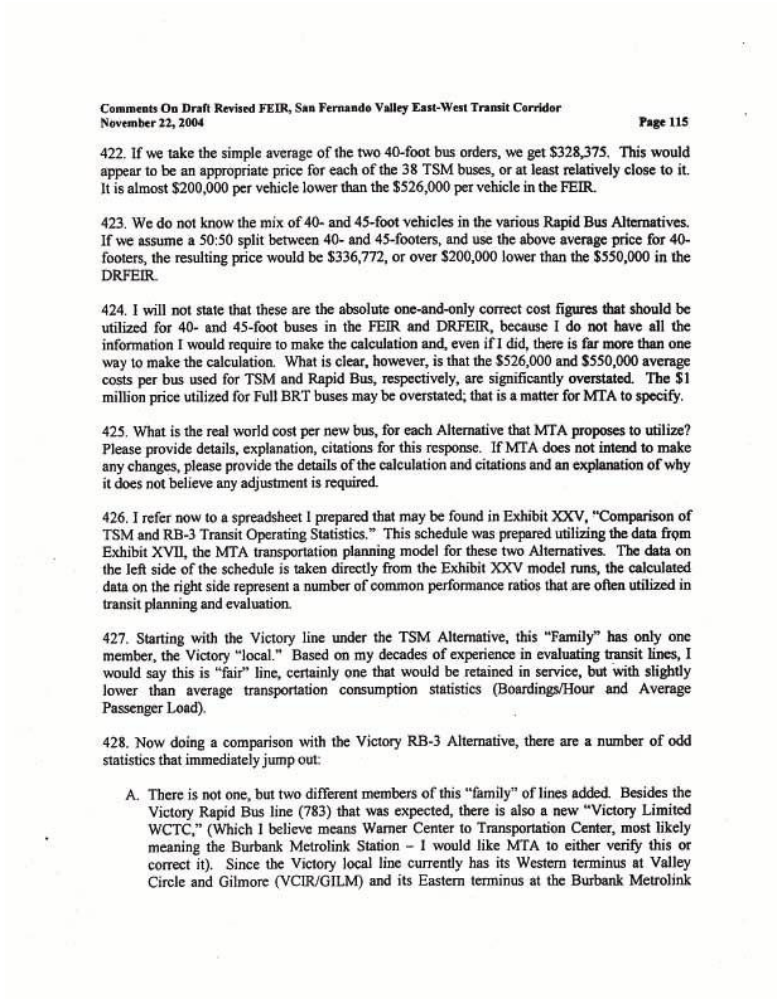


Comments On Draft Revised FEIR, San Fernando Valley East-West Transit Corridor
November 22, 2004 Page 115

422. If we take the simple average of the two 40-foot bus orders, we get $328,375. This would appear to be an appropriate price for each of the 38 TSM buses, or at least relatively close to it. It is almost $200,000 per vehicle lower than the $526,000 per vehicle in the FEIR.

423. We do not know the mix of 40- and 45-foot vehicles in the various Rapid Bus Alternatives. If we assume a 50:50 split between 40- and 45-footers, and use the above average price for 40-footers, the resulting price would be $336,772, or over $200,000 lower than the $550,000 in the DRFEIR.

424. I will not state that these are the absolute one-and-only correct cost figures that should be utilized for 40- and 45-foot buses in the FEIR and DRFEIR, because I do not have all the information I would require to make the calculation and, even if I did, there is far more than one way to make the calculation. What is clear, however, is that the $526,000 and $550,000 average costs per bus used for TSM and Rapid Bus, respectively, are significantly overstated. The $1 million price utilized for Full BRT buses may be overstated; that is a matter for MTA to specify.

425. What is the real world cost per new bus, for each Alternative that MTA proposes to utilize? Please provide details, explanation, citations for this response. If MTA does not intend to make any changes, please provide the details of the calculation and citations and an explanation of why it does not believe any adjustment is required.

426. I refer now to a spreadsheet I prepared that may be found in Exhibit XXV, "Comparison of TSM and RB-3 Transit Operating Statistics." This schedule was prepared utilizing the data from Exhibit XVII, the MTA transportation planning model for these two Alternatives. The data on the left side of the schedule is taken directly from the Exhibit XXV model runs, the calculated data on the right side represent a number of common performance ratios that are often utilized in transit planning and evaluation.

427. Starting with the Victory line under the TSM Alternative, this "Family" has only one member, the Victory "local." Based on my decades of experience in evaluating transit lines, I would say this is "fair" line, certainly one that would be retained in service, but with slightly lower than average transportation consumption statistics (Boardings/Hour and Average Passenger Load).

428. Now doing a comparison with the Victory RB-3 Alternative, there are a number of odd statistics that immediately jump out:

A. There is not one, but two different members of this "family" of lines added. Besides the Victory Rapid Bus line (783) that was expected, there is also a new "Victory Limited WCTC," (Which I believe means Warner Center to Transportation Center, most likely meaning the Burbank Metrolink Station – I would like MTA to either verify this or correct it). Since the Victory local line currently has its Western terminus at Valley Circle and Gilmore (VCIR/GILM) and its Eastern terminus at the Burbank Metrolink

20-232

20-233

20-234

Comment 20-233

As Response 20-227 notes, the cost per bus for the RB alternatives in 2001 dollars is $550,000. However, the real world may differ from each lot because of options on the number of buses being purchased at one given time.

Comment 20-234

Regarding the Victory Limited line, please see response to comment 20-34. There actually is a Victory Limited in the TSM alternative; its identifying mode and line number in the TSM model output reports is Mode 11, Line 245 and appears a couple of pages after the Victory "local." Total boardings for the Victory Limited in the TSM are 11,463.

When the rapid bus on Victory is introduced in the model, riders always choose the rapid bus route over the Victory Limited route since it was coded with identical bus stops and the rapid bus route is faster. It is likely that the miles and hours of operation applied to the Limited route would be transferred to provide additional rapid bus service, since peak hour loads suggest a more frequent headway can be supported.

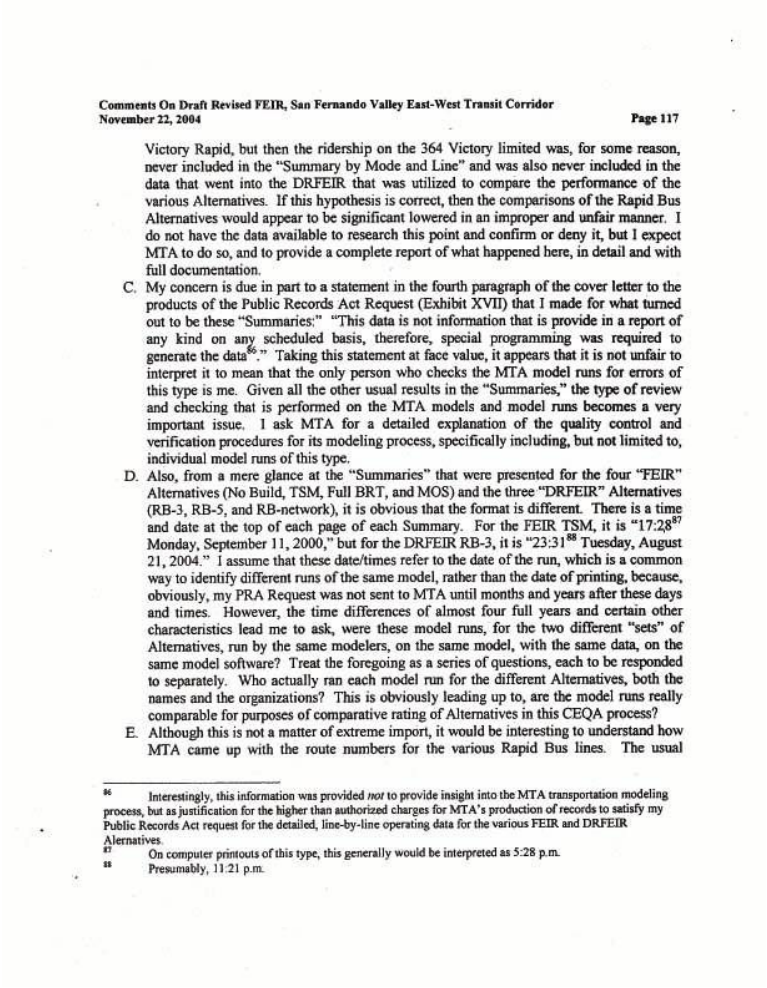
All alternatives were run on the same model with the same data and same model software.

Station, this appears to be a new route that would operate from the current end of line in the East to Warner Center. I do not have the data to be able to determine why MTA would believe that this would be a good line to add *on top* of the existing local line, with Rapid Bus service to be added at the same time, so I an forced to reserve judgment on the rationale this line, taken separately.

B. Oddly, while there are more buses added for this line than for the new Victory Rapid Bus line, and almost as many hours and miles as the pre-existing Victory line operates, there are *no* boardings, passenger miles, or passenger hours shown for this line at all. There are several hundred MTA bus and rail lines listed, line-by-line, in the RB-3 "Summary by Mode and Line," as well as hundreds more in the RB-5 and RB-Network "Summaries," and the *only* place we see this "triple zero" ridership reported is for the "364 – Victory Limited WCTC" line on these three "Summaries." Since it would make no sense to operate eleven buses two thousand miles a day without a single rider getting on, does this zero ridership for this line really mean that there is ridership, but that it is not reported on this series of "Summaries?" And does that mean that the ridership for this line is not reported in the ridership in the DRFEIR? Given that the ridership on the basic "164" Victory local line dropped from 8,018 in the TSM Alternative to 3,367 in the RB-3 Alternative – a 58% reduction – one reasonable explanation is that the major share of the reduction in the 164 ridership (besides the former 164 passengers who shifted to the 783 Rapid Bus service) was due to passengers shifting to the this appears to the faster 364 limited service, particularly those that were traveling East on Victory past Lankershim, with destinations that would include Burbank and the Burbank Metrolink Station[85]. However, there are passengers with destinations West of Lankershim on Victory (where the 783 Victory Rapid Bus turns South to the North Hollywood Red Line Station) that would take the 364 over either the 163 or the 783. Since limited stop routes generally have more stops than do Rapid Bus stops, commonly stopping at the "semi-arterials" half way between the "major arterials" where the Rapid Bus lines stop, there will be passengers that are clearly better served by the 364 limited than the 783 Rapid. The other major type of shift would be those passengers who simply hop on the first bus that comes along that is going where they are going and pay little attention to it being a local, limited, or Rapid. Therefore, it is very reasonable to argue that what might have happened is that the "logic" of the MTA transportation planning model added the 364 limited service on Victory, that the workings of the model assigned a significant number of passengers to the 364 Victory limited, rather than the 163 Victory local or the 783

[85] This would appear to confirm that my early recommendation to provide alternative Victory Rapid Bus service to the Burbank CBD/Media Center and/or Burbank Metrolink Station is worthy of further study. One complicating factor, of course, is that the City of Burbank is a separate municipality from the City of Los Angeles and has its own traffic signal control system separate from that managed by LA-DOT, which could cause complications with the types of traffic signal limited priority that MTA utilizes for Rapid Bus lines. However, there are several existing examples of Rapid Bus lines that do not have limited signal priority for portions of their alignment and, as we have seen, there are very significant bus travel time savings possible through the use of limited stop service alone, so even total, permanent disability to have limited traffic signal priority does not appear to be a disqualifying factor for Rapid Bus service.

20-234



Comments On Draft Revised FEIR, San Fernando Valley East-West Transit Corridor
November 22, 2004 **Page 117**

Victory Rapid, but then the ridership on the 364 Victory limited was, for some reason, never included in the "Summary by Mode and Line" and was also never included in the data that went into the DRFEIR that was utilized to compare the performance of the various Alternatives. If this hypothesis is correct, then the comparisons of the Rapid Bus Alternatives would appear to be significant lowered in an improper and unfair manner. I do not have the data available to research this point and confirm or deny it, but I expect MTA to do so, and to provide a complete report of what happened here, in detail and with full documentation.

C. My concern is due in part to a statement in the fourth paragraph of the cover letter to the products of the Public Records Act Request (Exhibit XVII) that I made for what turned out to be these "Summaries:" "This data is not information that is provide in a report of any kind on any scheduled basis, therefore, special programming was required to generate the data[86]." Taking this statement at face value, it appears that it is not unfair to interpret it to mean that the only person who checks the MTA model runs for errors of this type is me. Given all the other usual results in the "Summaries," the type of review and checking that is performed on the MTA models and model runs becomes a very important issue. I ask MTA for a detailed explanation of the quality control and verification procedures for its modeling process, specifically including, but not limited to, individual model runs of this type.

D. Also, from a mere glance at the "Summaries" that were presented for the four "FEIR" Alternatives (No Build, TSM, Full BRT, and MOS) and the three "DRFEIR" Alternatives (RB-3, RB-5, and RB-network), it is obvious that the format is different. There is a time and date at the top of each page of each Summary. For the FEIR TSM, it is "17:28[87] Monday, September 11, 2000," but for the DRFEIR RB-3, it is "23:31[88] Tuesday, August 21, 2004." I assume that these date/times refer to the date of the run, which is a common way to identify different runs of the same model, rather than the date of printing, because, obviously, my PRA Request was not sent to MTA until months and years after these days and times. However, the time differences of almost four full years and certain other characteristics lead me to ask, were these model runs, for the two different "sets" of Alternatives, run by the same modelers, on the same model, with the same data, on the same model software? Treat the foregoing as a series of questions, each to be responded to separately. Who actually ran each model run for the different Alternatives, both the names and the organizations? This is obviously leading up to, are the model runs really comparable for purposes of comparative rating of Alternatives in this CEQA process?

E. Although this is not a matter of extreme import, it would be interesting to understand how MTA came up with the route numbers for the various Rapid Bus lines. The usual

[86] Interestingly, this information was provided *not* to provide insight into the MTA transportation modeling process, but as justification for the higher than authorized charges for MTA's production of records to satisfy my Public Records Act request for the detailed, line-by-line operating data for the various FEIR and DRFEIR Alernatives.

[87] On computer printouts of this type, this generally would be interpreted as 5:28 p.m.

[88] Presumably, 11:21 p.m.

20-234

20-235

Comment 20-235

The identifying rapid bus route numbers try to use the last two digits of the local route number, but it is not always possible. The route numbers reflected in the model output reports are at the discretion of the person coding the route, and should not be taken as the intended route numbering in actual practice.

methodology, where possible, is to use a seven as the leading digit of a three-digit number and use the last two digits of the "local" route number, dropping the leading digit of a three-digit route number. The first two Rapid Bus lines were the 720 on Wilshire, where the local 20 line has operated for many years, and the 750 on Ventura, where the 150 is the local line. However, for these three lines alone, 165 Vanowen local has the 782 Vanowen Rapid Bus, the 163 Sherman Way local has the 781 Rapid Bus, and the 164 Victory local has the 783 Rapid Bus. Obviously, if a number has been previously utilized or committed, that is a problem, but that doesn't appear to be the case here. Could MTA explain how the route numbers for the various Rapid Bus lines were generated?

F. With the addition of the Rapid Bus service and, presumably, the 364 limited service, the ratio's for the "original" 164 Victory local become very poor, particularly the boardings/hour, which drops from a respectable 47.7 to a very poor 20.0. This is type of performance, and particularly such a large drop, generally indicates that far more service is being operated on the line than may be indicated. If what is happening here is that the new 364 Victory limited was running on top of the original 164 line for most its alignment, then many of the riders who used to take the 164 local are now using the limited – but there is the question of where, if anywhere, these riders went in the compilations. If MTA is basically doubling the amount of local service on the vast majority of the line, but the local/limited ridership is more or less the same, then it appears that some number of buses, hours and miles of local and/or limited service should be considered for elimination for this family of routes. There are a number of possibilities as to what is going on to produce this rather strange set of statistics, and I will refrain from further speculation as to cause, effect, and correction until I see MTA's explanation and documentation, which I expect to be in great detail.

G. One unexpected statistic is the VMT/VHT ratio – vehicle miles traveled divided by vehicle hours traveled, which is a close, but not precisely correct, measure of vehicle operating speed in revenue service[89]. Note that the "speed" of the Victory "local" is 14.6 mph, while that of the Rapid Bus is 15.8 – an increase of only approximately 8%. At page 8-3-15, MTA states, "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, ..." This is a very serious concern – MTA is saying that it intended to enter 20% speed improvements for all Rapid Bus lines, obviously including this one, but we only see a 8% increase. If MTA is saying that the model is doing one thing, but then we see the results show something very different, this could have a huge impact on the comparisons of the results of the models. A 20% increase

[89] I request MTA to precisely define both of these terms as they are utilized for purposes of these model runs, specifically addressing the differences between total miles and hours and revenue vehicle miles and hours, as those terms are defined by the Federal Transit Administration in the National Transit Database reporting instructions, specifically addressing "deadhead' operating between operating yards and route ends and between route ends for interlined service and layover/recovery time between runs. Which, if any, of these are included in VMT and VHT as those terms are utilized here?

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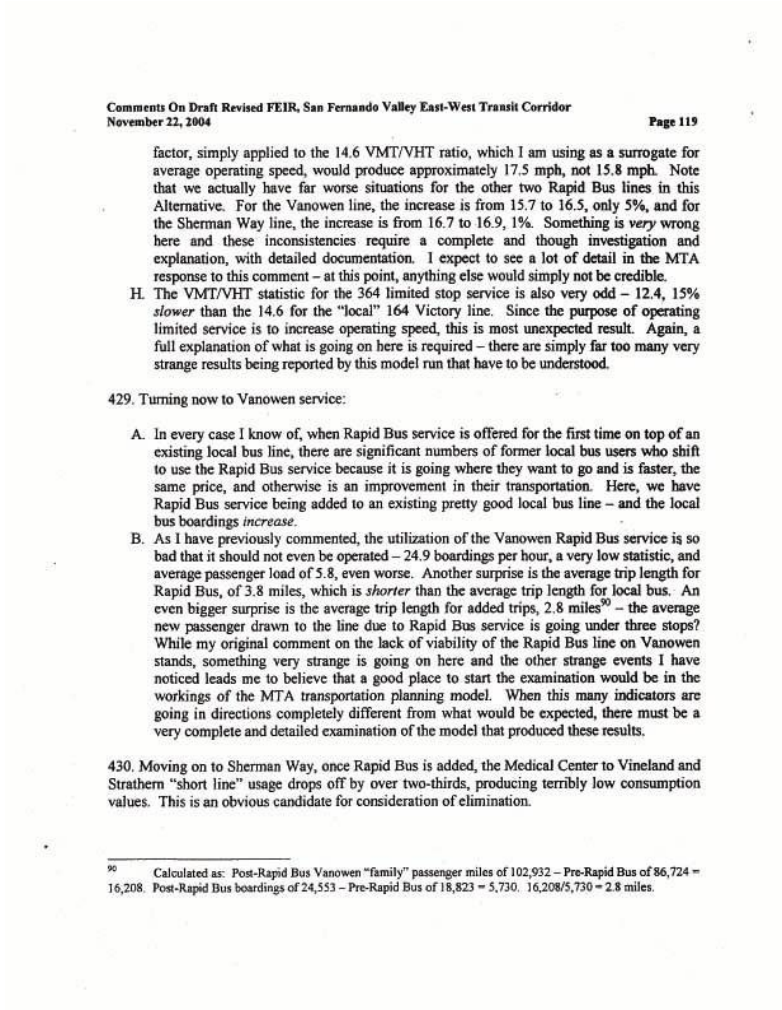
20-236

Comment 20-236

See response to comment 20-33.



Comments On Draft Revised FEIR, San Fernando Valley East-West Transit Corridor
November 22, 2004 Page 119

factor, simply applied to the 14.6 VMT/VHT ratio, which I am using as a surrogate for average operating speed, would produce approximately 17.5 mph, not 15.8 mph. Note that we actually have far worse situations for the other two Rapid Bus lines in this Alternative. For the Vanowen line, the increase is from 15.7 to 16.5, only 5%, and for the Sherman Way line, the increase is from 16.7 to 16.9, 1%. Something is *very* wrong here and these inconsistencies require a complete and though investigation and explanation, with detailed documentation. I expect to see a lot of detail in the MTA response to this comment – at this point, anything else would simply not be credible.

H. The VMT/VHT statistic for the 364 limited stop service is also very odd – 12.4, 15% *slower* than the 14.6 for the "local" 164 Victory line. Since the purpose of operating limited service is to increase operating speed, this is most unexpected result. Again, a full explanation of what is going on here is required – there are simply far too many very strange results being reported by this model run that have to be understood.

429. Turning now to Vanowen service:

A. In every case I know of, when Rapid Bus service is offered for the first time on top of an existing local bus line, there are significant numbers of former local bus users who shift to use the Rapid Bus service because it is going where they want to go and is faster, the same price, and otherwise is an improvement in their transportation. Here, we have Rapid Bus service being added to an existing pretty good local bus line – and the local bus boardings *increase*.

B. As I have previously commented, the utilization of the Vanowen Rapid Bus service is so bad that it should not even be operated – 24.9 boardings per hour, a very low statistic, and average passenger load of 5.8, even worse. Another surprise is the average trip length for Rapid Bus, of 3.8 miles, which is *shorter* than the average trip length for local bus. An even bigger surprise is the average trip length for added trips, 2.8 miles[90] – the average new passenger drawn to the line due to Rapid Bus service is going under three stops? While my original comment on the lack of viability of the Rapid Bus line on Vanowen stands, something very strange is going on here and the other strange events I have noticed leads me to believe that a good place to start the examination would be in the workings of the MTA transportation planning model. When this many indicators are going in directions completely different from what would be expected, there must be a very complete and detailed examination of the model that produced these results.

430. Moving on to Sherman Way, once Rapid Bus is added, the Medical Center to Vineland and Strathern "short line" usage drops off by over two-thirds, producing terribly low consumption values. This is an obvious candidate for consideration of elimination.

[90] Calculated as: Post-Rapid Bus Vanowen "family" passenger miles of 102,932 – Pre-Rapid Bus of 86,724 = 16,208. Post-Rapid Bus boardings of 24,553 – Pre-Rapid Bus of 18,823 = 5,730. 16,208/5,730 = 2.8 miles.

20-236

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Comment 20-237

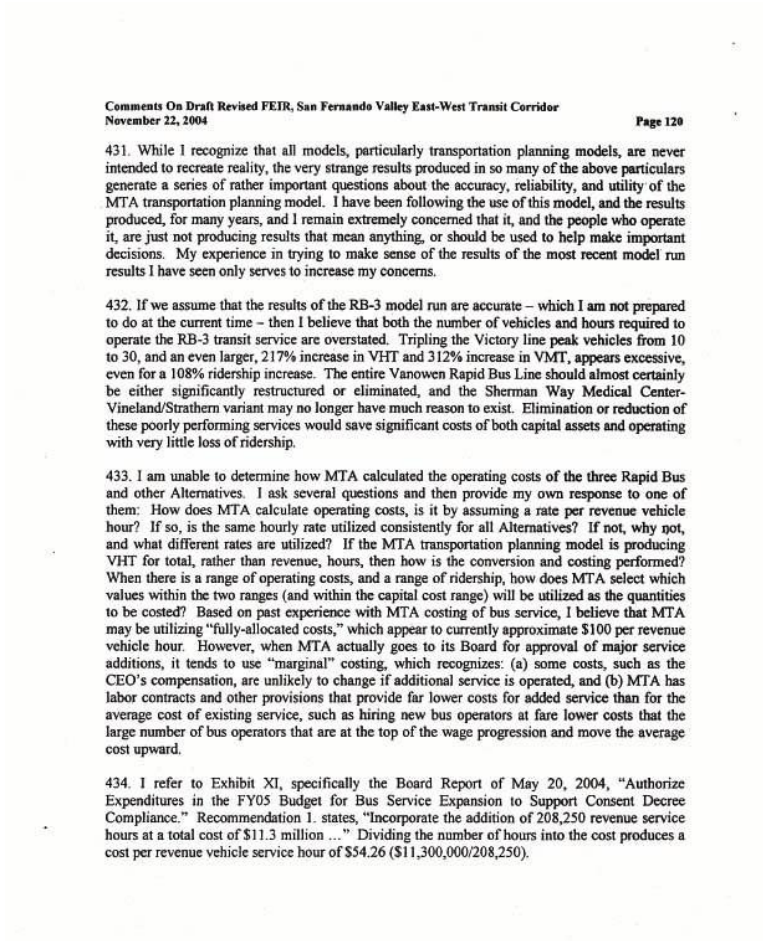
While there was a modest increase in boardings for the Vanowen local bus line for the RB-3 alternative, this is not an anomaly that is serious enough to overturn the validity of the MTA transportation demand model.

Comment 20-238

Please see Response 20-237.

Comment 20-239

Refinement of service would call for adjusting levels between local and rapid bus routes. The concept was to build on top of TSM improvements without replacing any service.



Comments On Draft Revised FEIR, San Fernando Valley East-West Transit Corridor
November 22, 2004 Page 120

431. While I recognize that all models, particularly transportation planning models, are never intended to recreate reality, the very strange results produced in so many of the above particulars generate a series of rather important questions about the accuracy, reliability, and utility of the MTA transportation planning model. I have been following the use of this model, and the results produced, for many years, and I remain extremely concerned that it, and the people who operate it, are just not producing results that mean anything, or should be used to help make important decisions. My experience in trying to make sense of the results of the most recent model run results I have seen only serves to increase my concerns.

20-240

432. If we assume that the results of the RB-3 model run are accurate – which I am not prepared to do at the current time – then I believe that both the number of vehicles and hours required to operate the RB-3 transit service are overstated. Tripling the Victory line peak vehicles from 10 to 30, and an even larger, 217% increase in VHT and 312% increase in VMT, appears excessive, even for a 108% ridership increase. The entire Vanowen Rapid Bus Line should almost certainly be either significantly restructured or eliminated, and the Sherman Way Medical Center-Vineland/Strathern variant may no longer have much reason to exist. Elimination or reduction of these poorly performing services would save significant costs of both capital assets and operating with very little loss of ridership.

20-241

433. I am unable to determine how MTA calculated the operating costs of the three Rapid Bus and other Alternatives. I ask several questions and then provide my own response to one of them: How does MTA calculate operating costs, is it by assuming a rate per revenue vehicle hour? If so, is the same hourly rate utilized consistently for all Alternatives? If not, why not, and what different rates are utilized? If the MTA transportation planning model is producing VHT for total, rather than revenue, hours, then how is the conversion and costing performed? When there is a range of operating costs, and a range of ridership, how does MTA select which values within the two ranges (and within the capital cost range) will be utilized as the quantities to be costed? Based on past experience with MTA costing of bus service, I believe that MTA may be utilizing "fully-allocated costs," which appear to currently approximate $100 per revenue vehicle hour. However, when MTA actually goes to its Board for approval of major service additions, it tends to use "marginal" costing, which recognizes: (a) some costs, such as the CEO's compensation, are unlikely to change if additional service is operated, and (b) MTA has labor contracts and other provisions that provide far lower costs for added service than for the average cost of existing service, such as hiring new bus operators at fare lower costs that the large number of bus operators that are at the top of the wage progression and move the average cost upward.

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20-247

434. I refer to Exhibit XI, specifically the Board Report of May 20, 2004, "Authorize Expenditures in the FY05 Budget for Bus Service Expansion to Support Consent Decree Compliance." Recommendation 1. states, "Incorporate the addition of 208,250 revenue service hours at a total cost of $11.3 million ..." Dividing the number of hours into the cost produces a cost per revenue vehicle service hour of $54.26 ($11,300,000/208,250).

20-248

Comment 20-240

The MTA model has been presented to the SCAG Regional Modeling Task Force on May 23, 2001. It was also presented to the Chief of Modeling at the FTA Headquarters on July 21, 2003. Accepting MTA model was the prerequisite for FTA in awarding a $500-million Full Funding Grant Agreement on Eastside LRT project to MTA. On April 16, 2004, a group of nationally renowned modeling experts appointed by USDOT (i.e., the Peer Review Panel) came to Los Angeles to evaluate SCAG model. During the review session, the Panel recommended SCAG to apply the MTA's modeling practice on mode choice and station choice for its new model development project. This recommendation was documented in the "TMIP Peer Reviews" web-site maintained by FHWA.

Comment 20-241

The fleet requirements are generated by the MTA travel demand forecasting model and are a function of the route length, transit vehicle travel time and frequency of service coded into the model. It may be the case that the RB-3 Alternative could be adjusted to eliminate some of the more poorly performing segments of the alternative, but it is unclear that this would make it more cost-effective than the BRT Alternative and if segments are deleted from this alternative it is likely to result in even fewer new transit trips attributable to the RB-3 Alternative, which already has fewer new transit trips than the BRT Alternative.

Comment 20-242

The operating costs for all of the alternatives have been developed using the MTA's O&M cost model, which is described in detail in Section 6-2.2 of the FEIR. As noted therein, "The model meets FTA guidelines for

estimating operating costs." It does not use a simple rate per revenue vehicle hour, but rather calculates the total MTA systemwide cost for each alternative based on the values of each element in Table 6-2.

Comment 20-243

The MTA O&M cost model is used for all alternatives. Because it is a resource cost build-up model, it does not employ the use of constant hourly rates, though hourly rates generally lead to small variances between alternatives.

Comment 20-244

As stated in response to comment 20-243, the hourly rate varies because of the use of a resource cost build-up model. The resulting hourly rates for the rapid bus alternatives have been provided to the commenter through the Public Records Act. Calculated cost per bus hour for each alternative is as follows (2001 dollars):

- No Build: $101.63
- TSM: $100.86
- BRT: $100.35 - $100.78
- RB-3: $99.66 - $100.03
- RB-5: $99.44 - $99.84
- RB-Network: $98.33 - $99.11

Comment 20-245

Vehicle hours traveled (VHT) is one of numerous inputs for MTA's O&M cost model. In estimating MTA's O&M costs, MTA's total VHT is provided through the transportation model. It is factored for use as an input in the MTA O&M cost model (according to the relationship of 1998 modeled VHT to actual 1998 VHT). For LADOT O&M costs, the incremental VHT is multiplied by a unit cost per revenue vehicle hour as

reported in the 1998 National Transit Database and escalated to 2001 dollars.

Comment 20-246

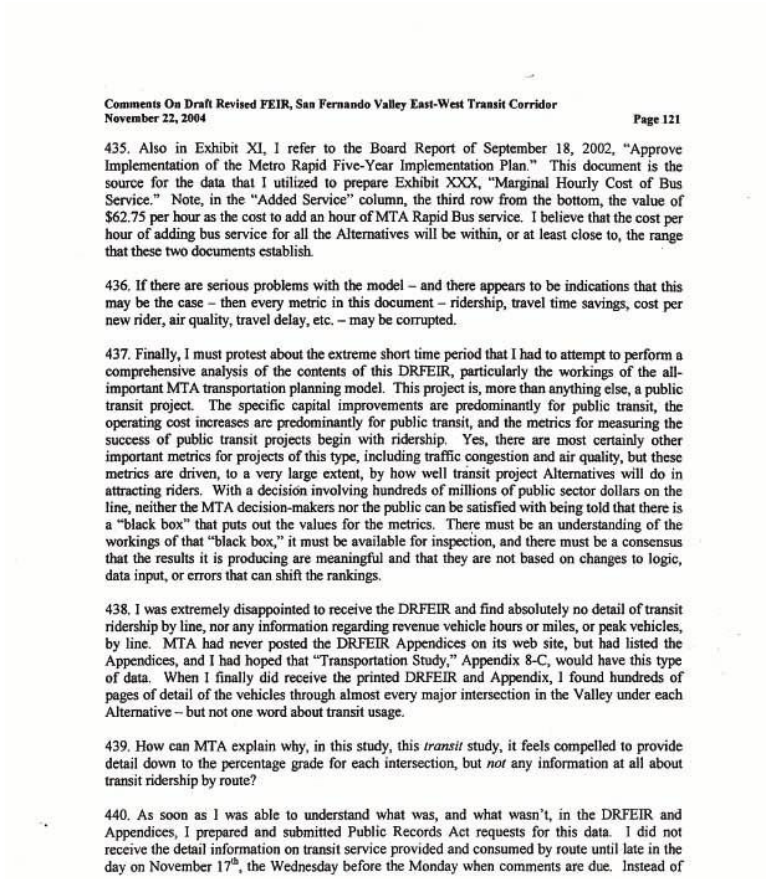
If there is a range of ridership, then the MTA O&M cost model is run separately based on differences in lower-bound versus upper-bound statistics. Capital costs also are calculated separately according to differences in lower-bound and upper-bound vehicle requirements.

Comment 20-247

The MTA O&M cost model is a resource cost build-up model that is typically used for MTA planning studies and financial analysis in environmental documents. FTA guidelines state a preference for use of a resource cost build-up model. See response to comment 31-22.

Comment 20-248

The commenter suggests use of a marginal cost per revenue vehicle service hour. See response to comment 20-247 and 31-22, which discusses the standard use of the MTA O&M cost model for financial analysis in environmental documents.



Comments On Draft Revised FEIR, San Fernando Valley East-West Transit Corridor
November 22, 2004 Page 121

435. Also in Exhibit XI, I refer to the Board Report of September 18, 2002, "Approve Implementation of the Metro Rapid Five-Year Implementation Plan." This document is the source for the data that I utilized to prepare Exhibit XXX, "Marginal Hourly Cost of Bus Service." Note, in the "Added Service" column, the third row from the bottom, the value of $62.75 per hour as the cost to add an hour of MTA Rapid Bus service. I believe that the cost per hour of adding bus service for all the Alternatives will be within, or at least close to, the range that these two documents establish.

20-249

436. If there are serious problems with the model – and there appears to be indications that this may be the case – then every metric in this document – ridership, travel time savings, cost per new rider, air quality, travel delay, etc. – may be corrupted.

20-250

437. Finally, I must protest about the extreme short time period that I had to attempt to perform a comprehensive analysis of the contents of this DRFEIR, particularly the workings of the all-important MTA transportation planning model. This project is, more than anything else, a public transit project. The specific capital improvements are predominantly for public transit, the operating cost increases are predominantly for public transit, and the metrics for measuring the success of public transit projects begin with ridership. Yes, there are most certainly other important metrics for projects of this type, including traffic congestion and air quality, but these metrics are driven, to a very large extent, by how well transit project Alternatives will do in attracting riders. With a decision involving hundreds of millions of public sector dollars on the line, neither the MTA decision-makers nor the public can be satisfied with being told that there is a "black box" that puts out the values for the metrics. There must be an understanding of the workings of that "black box," it must be available for inspection, and there must be a consensus that the results it is producing are meaningful and that they are not based on changes to logic, data input, or errors that can shift the rankings.

20-251

438. I was extremely disappointed to receive the DRFEIR and find absolutely no detail of transit ridership by line, nor any information regarding revenue vehicle hours or miles, or peak vehicles, by line. MTA had never posted the DRFEIR Appendices on its web site, but had listed the Appendices, and I had hoped that "Transportation Study," Appendix 8-C, would have this type of data. When I finally did receive the printed DRFEIR and Appendix, I found hundreds of pages of detail of the vehicles through almost every major intersection in the Valley under each Alternative – but not one word about transit usage.

20-252

439. How can MTA explain why, in this study, this *transit* study, it feels compelled to provide detail down to the percentage grade for each intersection, but *not* any information at all about transit ridership by route?

20-253

440. As soon as I was able to understand what was, and what wasn't, in the DRFEIR and Appendices, I prepared and submitted Public Records Act requests for this data. I did not receive the detail information on transit service provided and consumed by route until late in the day on November 17th, the Wednesday before the Monday when comments are due. Instead of

20-254

Comment 20-249
See Response 20-248.

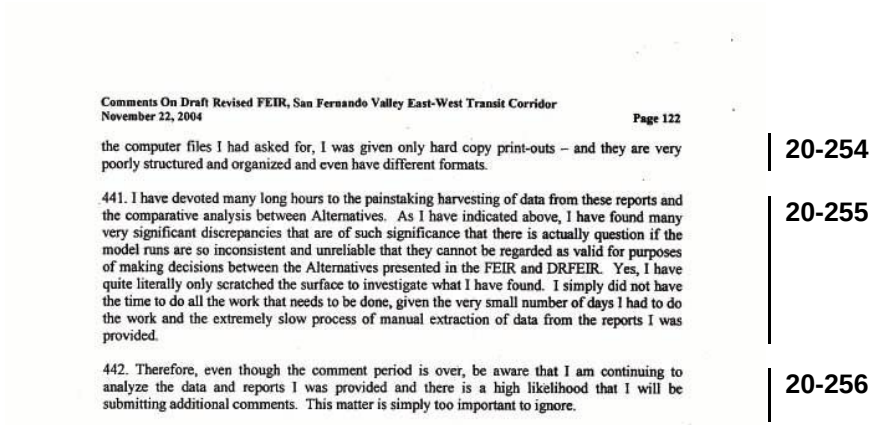
Comment 20-250
The model has been presented to qualified modeling professionals in the local area as well as nationwide. The model is considered adequate. Please also see Response to Comment: 20-240 for more details on how the MTA model has been accepted by peers in the nation.

Comment 20-251
The commenter again makes the same protest on the duration of the comment period. (Comment No. 20-12.) See Response to Comment Nos. 14-2 and 20-12 for discussions on the adequacy of the comment period for the Revised FEIR. As to the workings of MTA's model, please see Comment No. 20-255.

Comment 20-252
Model output reports generally are voluminous and not in a format that is usable for the public, but are readily provided under the Public Records Act.

Comment 20-253
Please see Response 20-252.

Comment 20-254
The commenter again makes the same protect concerning his Public Records Act request. (Comment



Comments On Draft Revised FEIR, San Fernando Valley East-West Transit Corridor
November 22, 2004 Page 122

the computer files I had asked for, I was given only hard copy print-outs – and they are very poorly structured and organized and even have different formats. 20-254

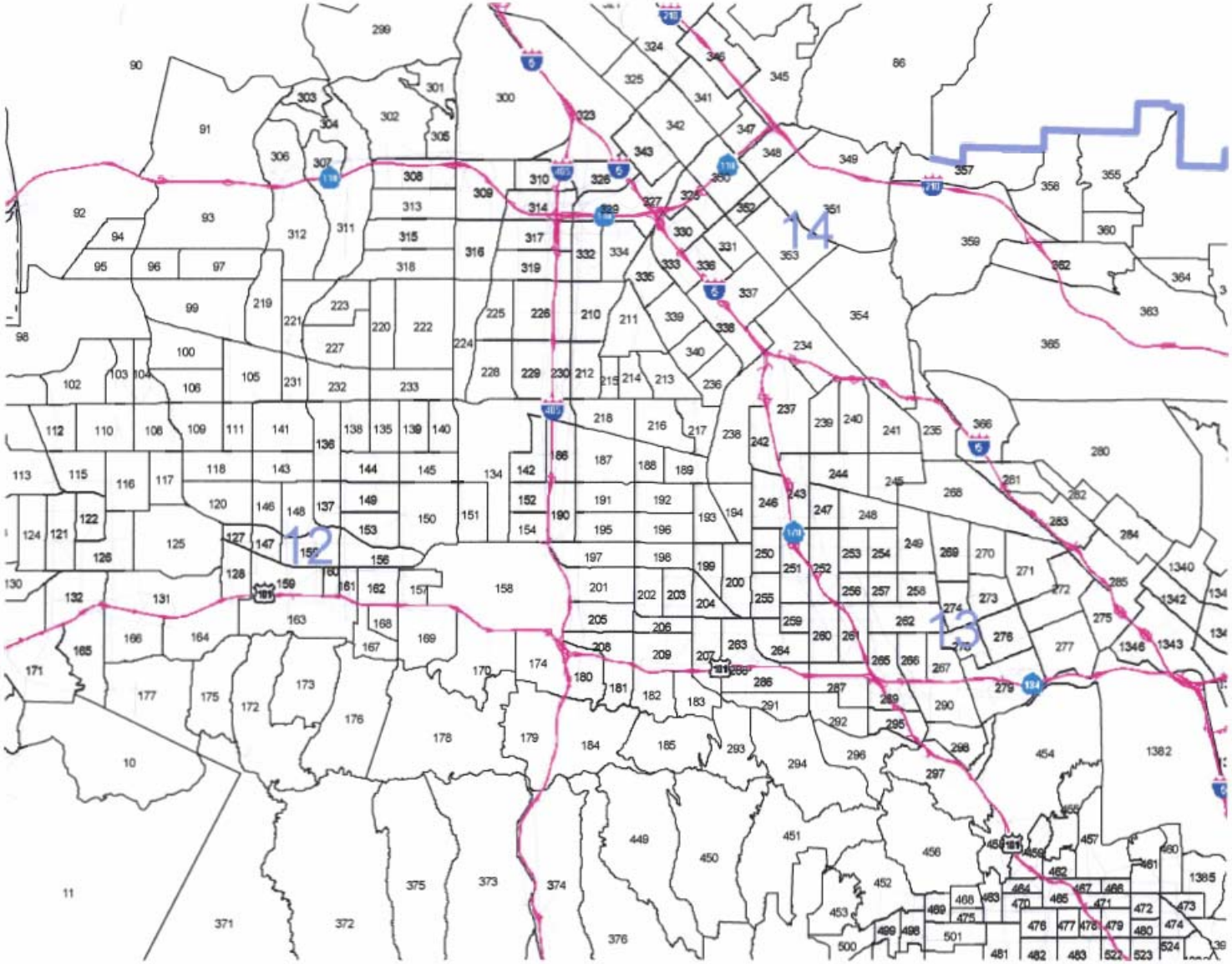
441. I have devoted many long hours to the painstaking harvesting of data from these reports and the comparative analysis between Alternatives. As I have indicated above, I have found many very significant discrepancies that are of such significance that there is actually question if the model runs are so inconsistent and unreliable that they cannot be regarded as valid for purposes of making decisions between the Alternatives presented in the FEIR and DRFEIR. Yes, I have quite literally only scratched the surface to investigate what I have found. I simply did not have the time to do all the work that needs to be done, given the very small number of days I had to do the work and the extremely slow process of manual extraction of data from the reports I was provided. 20-255

442. Therefore, even though the comment period is over, be aware that I am continuing to analyze the data and reports I was provided and there is a high likelihood that I will be submitting additional comments. This matter is simply too important to ignore. 20-256

No. 2-12.) See Response to Comment Nos. 14-2 and 20-12 for discussions on the MTA's compliance with Mr. Rubin's Public Records Act request.

Comment 20-255

The commenter suggests that MTA's model is not valid. MTA's model is a sophisticated and complex transportation demand model that utilizes hundreds of thousands of input data and performs over nine million calculations during a modeling run. MTA's model knows the spatial distribution of the population of the Valley by population data within zones. Figure "(see figure emailed on Sunday)" shows the model zones in the Valley. Each zone is programmed with 12 different dimensions on the population. The entire street network and existing transit network of the Valley are encoded in the model. A person's decision to choose to take transit is a highly complex evaluation. It considers the time and cost characteristics of various types of transportation available. For example, auto versus bus versus light rail versus commuter rail. Further, the model considers demographic and socioeconomic characteristics of the person making the choice. For a more detailed discussion on how the MTA's model determines a person's decision to take transit, see "Mode Choice Model Development Report," prepared by Parsons Brinckerhoff Quade & Douglas, Inc., and dated September 2002. A copy of this report is available for review in the MTA library. This same report contains a validation of the model's accuracy. The validation data for the Mode Choice module is set forth in Tables 9 and 10 of the report. Further additional model validation was conducted in 2001. See Response to Comment No. 20-33 for a discussion on the model validation of bus run times.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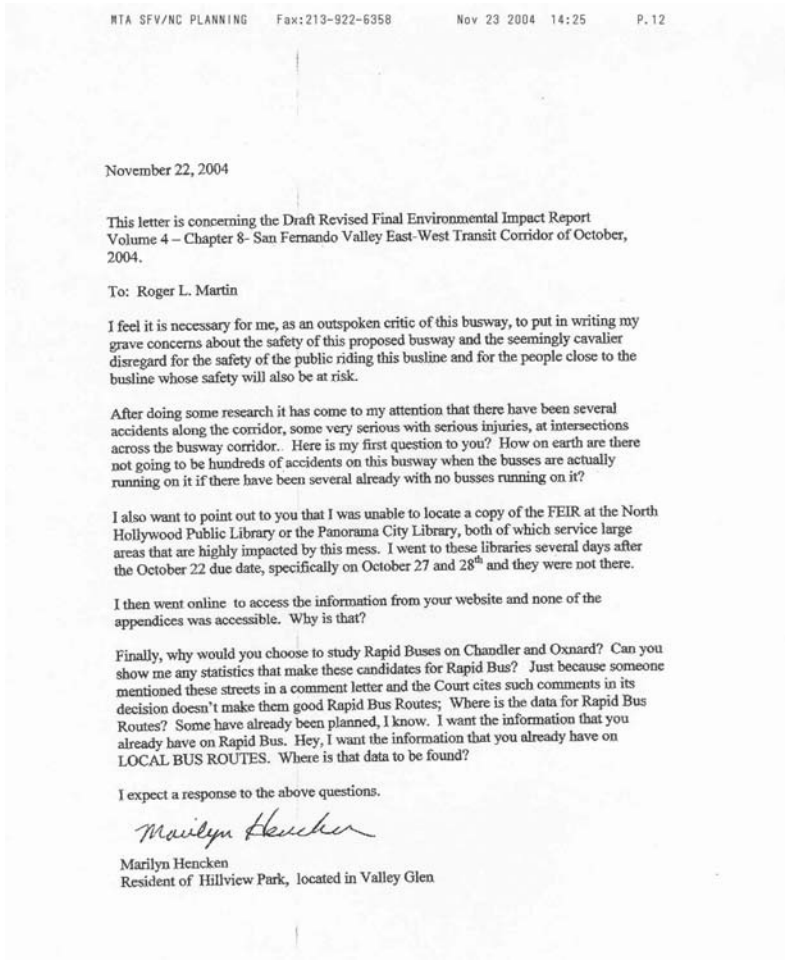
Comment 20-256
MTA is not obligated to respond to comments received outside the comment period.

Comment Letter 21



MTA SFV/NC PLANNING Fax:213-922-6358 Nov 23 2004 14:25 P.12

November 22, 2004

This letter is concerning the Draft Revised Final Environmental Impact Report Volume 4 – Chapter 8- San Fernando Valley East-West Transit Corridor of October, 2004.

To: Roger L. Martin

I feel it is necessary for me, as an outspoken critic of this busway, to put in writing my grave concerns about the safety of this proposed busway and the seemingly cavalier disregard for the safety of the public riding this busline and for the people close to the busline whose safety will also be at risk. 21-1

After doing some research it has come to my attention that there have been several accidents along the corridor, some very serious with serious injuries, at intersections across the busway corridor.. Here is my first question to you? How on earth are there not going to be hundreds of accidents on this busway when the busses are actually running on it if there have been several already with no busses running on it?

I also want to point out to you that I was unable to locate a copy of the FEIR at the North Hollywood Public Library or the Panorama City Library, both of which service large areas that are highly impacted by this mess. I went to these libraries several days after the October 22 due date, specifically on October 27 and 28th and they were not there. 21-2

I then went online to access the information from your website and none of the appendices was accessible. Why is that? 21-3

Finally, why would you choose to study Rapid Buses on Chandler and Oxnard? Can you show me any statistics that make these candidates for Rapid Bus? Just because someone mentioned these streets in a comment letter and the Court cites such comments in its decision doesn't make them good Rapid Bus Routes; Where is the data for Rapid Bus Routes? Some have already been planned, I know. I want the information that you already have on Rapid Bus. Hey, I want the information that you already have on LOCAL BUS ROUTES. Where is that data to be found? 21-4

I expect a response to the above questions.

Marilyn Hencken

Marilyn Hencken
Resident of Hillview Park, located in Valley Glen

Response to Comment Letter 21

Comment 21-1

Please refer to Response 13-2.

Comment 21-2

Copies of the Draft Revised FEIR were sent out by courier to all the public libraries in the San Fernando Valley on October 22, 2004. A letter accompanied the document explaining what the document is and that it should be made available to the public. The Project Manager did not receive any calls from the public, or any public library in the San Fernando Valley indicating that the documents were not available.

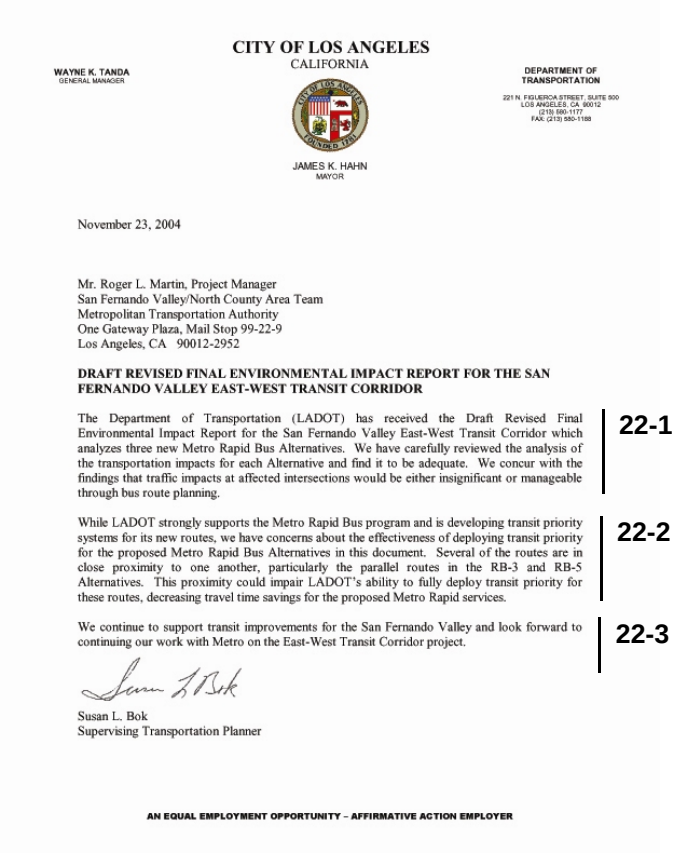
Comment 21-3

The appendices were provided in hard copy form at all libraries in the San Fernando Valley. They were not placed on Metro's website because they were not available in electronic format.

Comment 21-4

See Response to Comment No. 4-2 for a discussion on MTA's reasoning for selecting the three RB Alternatives. See Response to Comment No. 6-2 for a discussion on MTA's reasoning for including the Chandler and Oxnard routes in the RB-5 Alternative. The data on each of the Rapid Bus routes are included throughout the Revised FEIR. The data for the Ventura Boulevard Rapid Bus is included in the report entitled, "Final Report Los Angeles Metro Rapid Demonstration Program," dated July 2001. A copy of this document is available at the MTA library for review. Data on local bus routes in the Valley are also available at the MTA library.

Comment Letter 22



CITY OF LOS ANGELES
CALIFORNIA

WAYNE K. TANDA
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DEPARTMENT OF TRANSPORTATION
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JAMES K. HAHN
MAYOR

November 23, 2004

Mr. Roger L. Martin, Project Manager
San Fernando Valley/North County Area Team
Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop 99-22-9
Los Angeles, CA 90012-2952

DRAFT REVISED FINAL ENVIRONMENTAL IMPACT REPORT FOR THE SAN FERNANDO VALLEY EAST-WEST TRANSIT CORRIDOR

The Department of Transportation (LADOT) has received the Draft Revised Final Environmental Impact Report for the San Fernando Valley East-West Transit Corridor which analyzes three new Metro Rapid Bus Alternatives. We have carefully reviewed the analysis of the transportation impacts for each Alternative and find it to be adequate. We concur with the findings that traffic impacts at affected intersections would be either insignificant or manageable through bus route planning. **22-1**

While LADOT strongly supports the Metro Rapid Bus program and is developing transit priority systems for its new routes, we have concerns about the effectiveness of deploying transit priority for the proposed Metro Rapid Bus Alternatives in this document. Several of the routes are in close proximity to one another, particularly the parallel routes in the RB-3 and RB-5 Alternatives. This proximity could impair LADOT's ability to fully deploy transit priority for these routes, decreasing travel time savings for the proposed Metro Rapid services. **22-2**

We continue to support transit improvements for the San Fernando Valley and look forward to continuing our work with Metro on the East-West Transit Corridor project. **22-3**

Susan L. Bok
Supervising Transportation Planner

AN EQUAL EMPLOYMENT OPPORTUNITY – AFFIRMATIVE ACTION EMPLOYER

Response to Comment Letter 22

Comment 22-1
LADOT's concurrence in the findings of the Revised FEIR transportation impact analysis is acknowledged for the record.

Comment 22-2
LADOT's comment confirms the findings of the Revised FEIR that it may not be possible to provide the same level of transit signal priority to multiple Rapid Bus Routes as to the Ventura Rapid Bus.

Comment 22-3
The comment is acknowledged for the record.

Comment Letter 23

-----Original Message-----
From: Thomas A Rubin [mailto:tarubin@earthlink.net]
Sent: Tuesday, November 23, 2004 4:58 PM
To: martinr@metro.net
Subject: San Fernando Valley East-West Transit Corridor Draft Revised Environmental Impact Report, Comment on

Roger L. Martin
Project Manager, San Fernando Valley/North County Area Team
Metropolitan Transportation Authority
One Gateway Plaza
Mail Stop: 99-22-9
Los Angeles, California 90012-2952

Via e-mail

Dear Mr. Martin:

In addition to my comment letter on the San Fernando Valley East-West Transit Corridor Draft Revised Environmental Impact Report I hand-delivered yesterday afternoon, I have one additional comment I am now transmitting.

In Section 8-2.2 ALTERNATIVES CONSIDERED IN THE REVISED FEIR, the following information appears in the description of each and every Rapid Bus line in each of the three Rapid Bus Alternatives: **23-1**

"The hours of operation are from 5:00 AM to 10:00 PM, Monday through Sunday. The headway for this route is 10 minutes during the peak hours, and 12 minutes during the off-peak hours."

Response to Comment Letter 23

Comment 23-1

MTA has set a current guideline of 10-minute peak period service and 12-minute off-peak service as desirable for Metro Rapid Bus. The individual MTA Sectors adjust actual service levels to meet a variety of factors, including financial and resource availability. Absent major budget limitations, MTA would like to introduce the various Metro Rapid lines with higher levels of service to give each market an opportunity to fully develop. At the same time, MTA expects that continued ridership growth over time would warrant operation of at least the guideline level of service by 2020 on nearly every line.

For the purposes of considering the various proposed alternatives in Section 8-2.2, it was expected that full Metro Rapid service levels would be warranted by 2020 given the ongoing changes in San Fernando Valley demographics and densities. As well, a critical element in developing the alternatives was the recognition that ridership is generated at both a route level and for the overall network. The proposed service frequencies allow for reliable and timely transfers at service intersecting points, thus keeping average transfer wait times to reasonably attractive levels. Also, with both Metro Rapid and local bus service operating on the same corridors (standard MTA practice), the Metro Rapid Bus must operate at competitive frequencies to the local bus service to make it attractive when out-of-vehicle time is considered. Thus, keeping the proposed Metro Rapid lines at reasonably frequent levels specified in the MTA service guidelines allowed each

First, what does "off-peak hours" mean? For "working weekdays," does it include early morning (between 5:00 AM and the beginning of the morning peak), mid-day (between the morning and evening peaks) service and evening (after the evening peak ends to 10:00 P.M.) service? Does it include service on Saturdays? On Sundays and Holidays? If "off-peak" does NOT mean all of the above (other than peak hours), then what are the headways for the days and times of service not included as "off-peak?"

As a general rule, I agree that Rapid Bus service at no more than approximately ten minute headways during peak periods is appropriate, although there could certainly be some exceptions where somewhat longer headways may be desirable. However, I note that MTA has many current Rapid Bus lines that have mid-day, evening, and Saturday and Sunday headways that are significantly longer than 12 minutes. Non-peak Rapid Bus service should be more closely tied to demand - there is no reason to be running service if the demand is not present.

For many of the Rapid Bus lines proposed in the three Rapid Bus Alternatives, the high level of Rapid Bus service proposed may be wasteful and not justified. Also, there is often very good reason to change the headways during the various periods I list above, such as starting early evening service with headways like 10-12 minutes, but longer headways closer to 10:00 PM.

Also, for individual routes, the 5:00 AM to 10:00 start and end times may require adjustment. For some routes, there may be little, or even no, reason to operate on Sundays and perhaps Saturdays, but this, like all scheduling decisions, should be driven by the data and by the application of proper transit management solutions.

23-1

alternative to fully realize its ridership potential while minimizing operating and capital costs.

The following service frequencies provide a representative plan of RB operations:

Weekdays:	5am-6am	15-min
	6am-9am	10-min
	9am-2pm	12-min
	2pm-7pm	10-min
	7pm-11-pm	15-min
Weekends:	6am-8am	15-min
	8am-6pm	12-min
	6pm-10pm	15-min

Comment Letter 24

Mr. Roger L. Martin
Project Manager
SF Valley/No. County Area team
MTA
One Gateway Plaza
LA, CA 90012

I am a concerned resident of Victory Park Neighborhood were your Van Nuys bus station is being built. I am also an active member of the Victory Park Neighborhood association. I would like to address a few of the issues that have been discussed in the revised copy of your EIR. I would first like to state that I am not in agreement with the station being built and feel that is a waste of tax payer dollars. The building of this station has been a thorn in my/our side since construction began. The truck and building noise, dust and air pollution, outsiders it has attracted, time consuming traffic and damage to my property. But enough of my personal feelings, I would like some clarification and understanding of this difficult to read EIR. **24-1**

My and biggest concern is how difficult it is to get a copy of your EIR? I was informed that I could go to the library to view a copy or have a copy sent via email. Although I did not request a copy, other members did without success as I was with the library. I due understand that this is a very important document and most likely limited in **24-2**

Response to Comment Letter 24

Comment 24-1
The comment is acknowledged for the record.

Comment 24-2
Copies of the Draft Revised FEIR were made available at every public library in the San Fernando Valley, Metro's library in downtown Los Angeles; and available for viewing in PDF format at Metro's website at www.metro.net/projects_plans. Additionally, 30-day Notice of Availability ads were run in the Los Angles Times (Valley Edition), Daily News, and in Spanish in La Opinion. Anyone that requested a copy by phone, e-mail or letter of the Draft Revised FEIR was sent a copy.

supply, but just as it is important to the project it is important to the people that is going affect. **24-2**

Since you were suppose to evaluate a true bus grid as an alternative, why did you choose the routes you chose? Could there have been other routes used to provide better data and what was the logic behind those streets used? What data was used to determine ridership for each route and was household income as well as public transit dependent figures used when you chose these routes? **24-3**

Is the TSM included in those alternatives in terms of cost? Also, were the new riders coming to TSM because of the upgrades factored into the ridership model when calculating ridership for the Rapid Bus Alternatives? Were the TSM routes and ridership included in the grid of busses like you did with the Orange line? If the answer is yes, can you please provide this date with a detailed analysis to prove that apples are being compared to apples? **24-4**

Concerning ridership was there consideration of every major East/West and North /South streets in the valley to determine the potential ridership for each? If not, why not? Why didn't the Appendices include ridership data? How am I supposed to understand and trust the facts and figures for ridership when there is no supporting data? **24-5**

Comment 24-3

The commenter asks how MTA chose the three RB Alternatives. The characteristics of the Valley's streets and the forecasted performance of the RB Alternatives represents a good estimate of what can be accomplished by multiple Rapid Buses in the Valley. See Response to Comment No. 4-2 for discussion on MTA's reasoning in selecting the three RB Alternatives. There may be other assemblages of Rapid Bus routes that could generate greater ridership than any of the three RB Alternatives. However, MTA is aware of none and optimizing the alternative of multiple Rapid Bus routes is infeasible. See Response to Comment No. 20-6 for a discussion on why optimizing Rapid Bus routes is an infeasible effort. The data used to determine ridership are the location of discrete zones (see the Figure at the end of the Response to Comment No. 20-255); nine dimensions of socioeconomic data (single dwelling units, multiple dwelling units, group quarters, retail employment, total employment, population, median household income, workers, and licensed drivers); the streets layout, the characteristics of the streets (type of street, length, number of lanes, free-flow speed, and direction of travel, HOV lanes, area type); the transit network layout, and the characteristics of the transit network. This information constitutes thousands of entries that are encoded into MTA's transportation demand model. Numerous rules are applied to this data to determine ridership. The model computes trillions of calculations that typically take 24 hours of computing time on sophisticated, powerful computers to generate the model's output. See the report entitled, Service and Travel Forecasting Methodology Report," dated August 2002, prepared by Parsons Brinckerhoff Quade & Douglas, Inc. for a detailed discussion on how MTA's model determines ridership. A copy of this report is available for review at the MTA library. See the report entitled, "Mode Choice Model Development Report," dated September 2002 and prepared by Parsons Brinckerhoff Quade & Douglas, Inc. for a detailed discussion on how MTA's model calculate a person's decision to take transit. A copy of this report is available for review at the MTA library.

The idea that a network of 9 Rapid Bus routes only generates 200 more new riders than 3 routes is rather hard to conceive. How is that possible? One would think that there are a lot more new passengers that would prefer to get on a bus closer to them than have to travel south to the BRT line. It seems to me that a greater number of routes which offer more convenience to travelers and that have stops closer to their homes would, by definition, encourage more new riders. What do you base your conclusions on? **24-6**

I believe your revised EIR lucks pertinent information and appear to be a little skewed. It seems more time needs to be dedicated and further research applied before final decisions should be made. It is imperative that our concerns as a community are heard and addressed in your decisions making process. **24-7**

Respectfully

Eric G. Branche

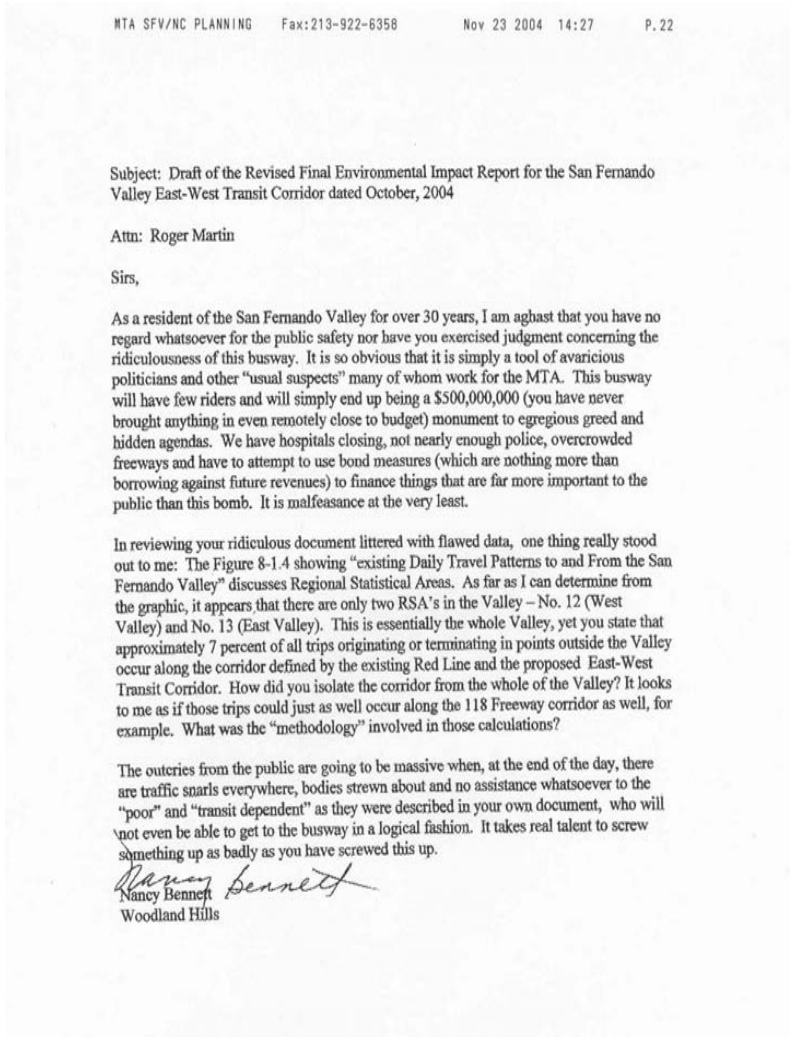
Comment 24-4
Please see Response 18-2.

Comment 24-5
See response to Comment 4-2 or a discussion on MTA's reasoning for selecting the RB Alternatives to study in the Revised FEIR. See response to Comment 6-3 for a discussion on the infeasibility of modeling ridership for every major street in the Valley. Even if MTA was able to model ridership for each street separately, adding up the ridership of various routes would be inaccurate. MTA's model considers the interplay of all routes of a public transit system in determining ridership, which would generate results not equal to the mere addition of separate model runs. See the report entitled, "Service and Travel Forecasting Methodology Report," prepared by Parson Brinckerhoff Quade & Douglas in August 2002 for a discussion on how MTA's model determines ridership. A copy of this report is available for review at the MTA library.

Comment 24-6
Please see Response 11-2.

Comment 24-7
The commenter suggests the Revised FEIR lacks pertinent information. The Draft Revised FEIR presented information and data sufficient to provide the public with an opportunity to conduct a meaningful review and comment on the project. In addition, responses such as 4.2 can give an idea of the amount of research conducted for the study.

Comment Letter 25



MTA SFV/NC PLANNING Fax:213-922-6358 Nov 23 2004 14:27 P.22

Subject: Draft of the Revised Final Environmental Impact Report for the San Fernando Valley East-West Transit Corridor dated October, 2004

Attn: Roger Martin

Sirs,

As a resident of the San Fernando Valley for over 30 years, I am aghast that you have no regard whatsoever for the public safety nor have you exercised judgment concerning the ridiculousness of this busway. It is so obvious that it is simply a tool of avaricious politicians and other "usual suspects" many of whom work for the MTA. This busway will have few riders and will simply end up being a $500,000,000 (you have never brought anything in even remotely close to budget) monument to egregious greed and hidden agendas. We have hospitals closing, not nearly enough police, overcrowded freeways and have to attempt to use bond measures (which are nothing more than borrowing against future revenues) to finance things that are far more important to the public than this bomb. It is malfeasance at the very least.

25-1

In reviewing your ridiculous document littered with flawed data, one thing really stood out to me: The Figure 8-1.4 showing "existing Daily Travel Patterns to and From the San Fernando Valley" discusses Regional Statistical Areas. As far as I can determine from the graphic, it appears that there are only two RSA's in the Valley – No. 12 (West Valley) and No. 13 (East Valley). This is essentially the whole Valley, yet you state that approximately 7 percent of all trips originating or terminating in points outside the Valley occur along the corridor defined by the existing Red Line and the proposed East-West Transit Corridor. How did you isolate the corridor from the whole of the Valley? It looks to me as if those trips could just as well occur along the 118 Freeway corridor as well, for example. What was the "methodology" involved in those calculations?

25-2

The outcries from the public are going to be massive when, at the end of the day, there are traffic snarls everywhere, bodies strewn about and no assistance whatsoever to the "poor" and "transit dependent" as they were described in your own document, who will not even be able to get to the busway in a logical fashion. It takes real talent to screw something up as badly as you have screwed this up.

25-3

Nancy Bennett
Woodland Hills

Response to Comment Letter 25

Comment 25-1

The commenter's concern for safety is acknowledged for the record. The commenter is directed to Section 14-13 (*Safety and Security*) of the Revised FEIR, which concluded that the BRT Alternative would not result in significant safety impacts under CEQA. Nevertheless, measures to increase safety and security were adopted as part of the FEIR.

The commenter's concern for cost overruns is acknowledged for the record.

According to Table 6-5 (*Ridership*) of the Revised FEIR, 18,700 passengers are projected to use the BRT Alternative daily.

Comment 25-2

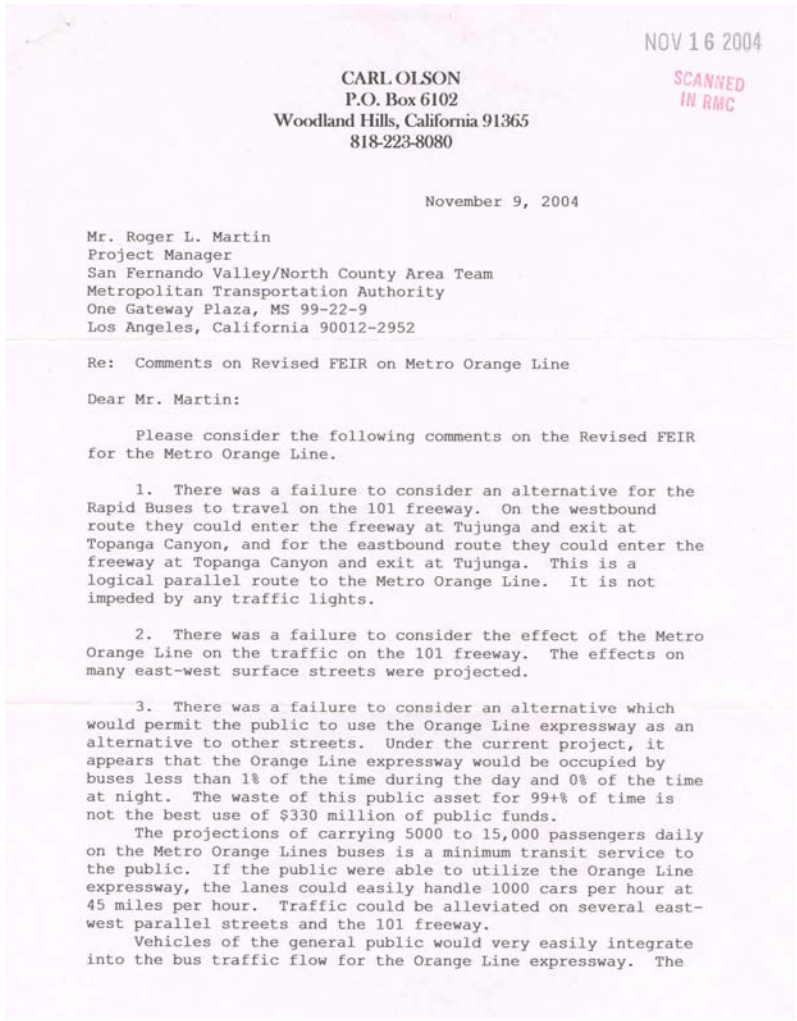
Figure 8-1-4 "Existing Daily Travel Patterns To and From the San Fernando Valley" shows travel relationships between 5 Regional Statistical Areas (RSA) where the East and West portion of the San Fernando Area represent 2 out of the 5. These travel relationships are more likely connected by the use of the 405 Freeway, Interstate 5, and the 101 Freeway, as opposed to the 118 Freeway, which runs through only a small portion of RSA 12 and not the other 4 RSAs.

The methodology used to calculate the travel statistics represented in the graphic were prepared with the LACMTA Travel Demand Model, 1998.

Comment 25-3

The commenter's concern is acknowledged for the record. The commenter is directed to Section 6-3.7 (*Significant Trade-Offs* of the FEIR, which states that the BRT Alternative "…has the opportunity to provide the greatest benefits in travel time savings, and leads to the greatest amount of added transit riders."

Comment Letter 26



NOV 16 2004

SCANNED IN RMC

CARL OLSON
P.O. Box 6102
Woodland Hills, California 91365
818-223-8080

November 9, 2004

Mr. Roger L. Martin
Project Manager
San Fernando Valley/North County Area Team
Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-9
Los Angeles, California 90012-2952

Re: Comments on Revised FEIR on Metro Orange Line

Dear Mr. Martin:

Please consider the following comments on the Revised FEIR for the Metro Orange Line.

1. There was a failure to consider an alternative for the Rapid Buses to travel on the 101 freeway. On the westbound route they could enter the freeway at Tujunga and exit at Topanga Canyon, and for the eastbound route they could enter the freeway at Topanga Canyon and exit at Tujunga. This is a logical parallel route to the Metro Orange Line. It is not impeded by any traffic lights. **26-1**

2. There was a failure to consider the effect of the Metro Orange Line on the traffic on the 101 freeway. The effects on many east-west surface streets were projected. **26-2**

3. There was a failure to consider an alternative which would permit the public to use the Orange Line expressway as an alternative to other streets. Under the current project, it appears that the Orange Line expressway would be occupied by buses less than 1% of the time during the day and 0% of the time at night. The waste of this public asset for 99+% of time is not the best use of $330 million of public funds. **26-3**

The projections of carrying 5000 to 15,000 passengers daily on the Metro Orange Lines buses is a minimum transit service to the public. If the public were able to utilize the Orange Line expressway, the lanes could easily handle 1000 cars per hour at 45 miles per hour. Traffic could be alleviated on several east-west parallel streets and the 101 freeway.

Vehicles of the general public would very easily integrate into the bus traffic flow for the Orange Line expressway. The

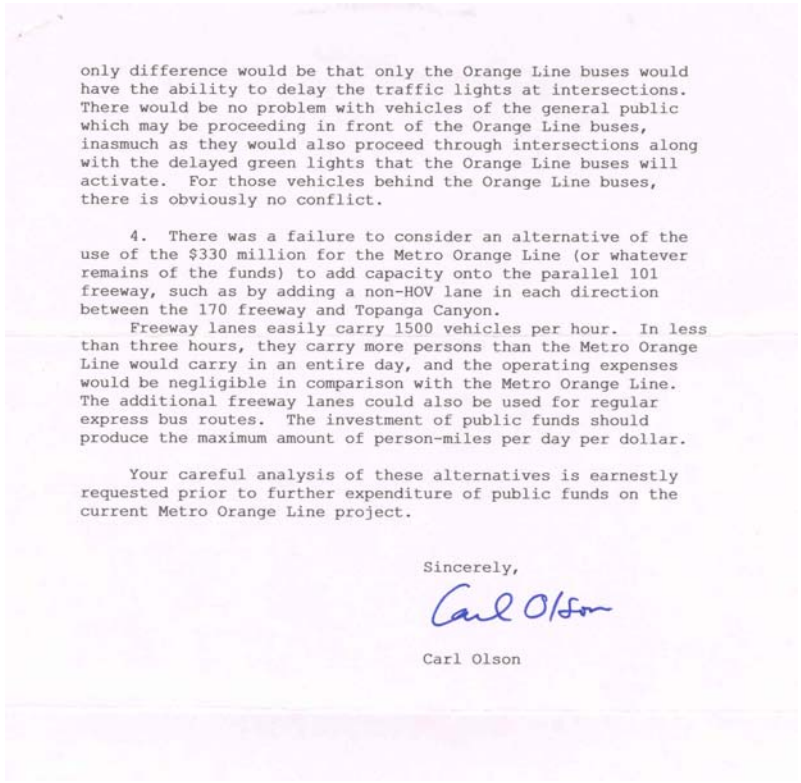
Response to Comment Letter 26

Comment 26-1

There do exist LADOT Commuter Express lines 422 and 423, which run along the 101 freeway. Without dedicated HOV lanes on the 101 Freeway it does not appear worthwhile to add additional express bus or Rapid Bus service on the freeway. The Rapid Bus program is designed to provide limited stop service (approximately one-mile spacing) and take advantage of transit signal priority, neither of which is practical on the freeway.

Comment 26-2

The 101 Freeway is included as part of the highway network in the MTA travel demand forecasting model, as are all major arterials in the highway network. The statistics that were reported for Vehicle Miles of Travel (VMT) and Vehicle Hours of Travel (VHT) in the Draft and Revised Final EIRS included aggregated data for the entire highway network, including trips on the 101 Freeway. The specific volumes on the freeway were not reported because the changes in freeway volumes associated with the transit alternatives were relatively small positive effects (reduced volumes) and the purpose of an environmental impact report is to disclose impacts that may require mitigation. Positive benefits of projects are often not the focus of environmental documents.



only difference would be that only the Orange Line buses would have the ability to delay the traffic lights at intersections. There would be no problem with vehicles of the general public which may be proceeding in front of the Orange Line buses, inasmuch as they would also proceed through intersections along with the delayed green lights that the Orange Line buses will activate. For those vehicles behind the Orange Line buses, there is obviously no conflict.

4. There was a failure to consider an alternative of the use of the $330 million for the Metro Orange Line (or whatever remains of the funds) to add capacity onto the parallel 101 freeway, such as by adding a non-HOV lane in each direction between the 170 freeway and Topanga Canyon.

Freeway lanes easily carry 1500 vehicles per hour. In less than three hours, they carry more persons than the Metro Orange Line would carry in an entire day, and the operating expenses would be negligible in comparison with the Metro Orange Line. The additional freeway lanes could also be used for regular express bus routes. The investment of public funds should produce the maximum amount of person-miles per day per dollar.

Your careful analysis of these alternatives is earnestly requested prior to further expenditure of public funds on the current Metro Orange Line project.

Sincerely,

Carl Olson

Carl Olson

26-3

26-4

26-5

Comment 26-3

Allowing other vehicles to use the busway, along with buses, would remove the advantage afforded to the buses in terms of travel in dedicated lanes. This would be inconsistent with the goals of the proposed project.

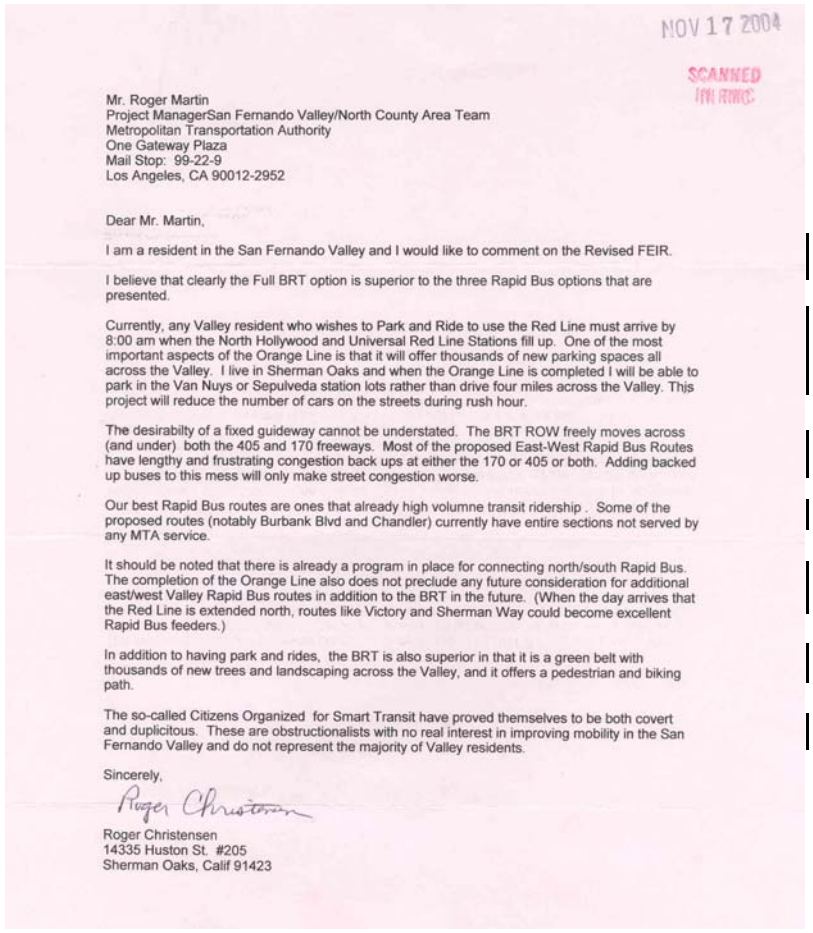
Comment 26-4

The addition of additional travel lanes on the 101 Freeway is the subject of a separate study that has been conducted by the Southern California Association of Governments.

Comment 26-5

The comment is acknowledged for the record.

Comment Letter 27



NOV 17 2004

SCANNED
IN RMC

Mr. Roger Martin
Project ManagerSan Fernando Valley/North County Area Team
Metropolitan Transportation Authority
One Gateway Plaza
Mail Stop: 99-22-9
Los Angeles, CA 90012-2952

Dear Mr. Martin,

I am a resident in the San Fernando Valley and I would like to comment on the Revised FEIR. **27-1**

I believe that clearly the Full BRT option is superior to the three Rapid Bus options that are presented.

Currently, any Valley resident who wishes to Park and Ride to use the Red Line must arrive by 8:00 am when the North Hollywood and Universal Red Line Stations fill up. One of the most important aspects of the Orange Line is that it will offer thousands of new parking spaces all across the Valley. I live in Sherman Oaks and when the Orange Line is completed I will be able to park in the Van Nuys or Sepulveda station lots rather than drive four miles across the Valley. This project will reduce the number of cars on the streets during rush hour. **27-2**

The desirabilty of a fixed guideway cannot be understated. The BRT ROW freely moves across (and under) both the 405 and 170 freeways. Most of the proposed East-West Rapid Bus Routes have lengthy and frustrating congestion back ups at either the 170 or 405 or both. Adding backed up buses to this mess will only make street congestion worse. **27-3**

Our best Rapid Bus routes are ones that already high volumne transit ridership . Some of the proposed routes (notably Burbank Blvd and Chandler) currently have entire sections not served by any MTA service. **27-4**

It should be noted that there is already a program in place for connecting north/south Rapid Bus. The completion of the Orange Line also does not preclude any future consideration for additional east/west Valley Rapid Bus routes in addition to the BRT in the future. (When the day arrives that the Red Line is extended north, routes like Victory and Sherman Way could become excellent Rapid Bus feeders.) **27-5**

In addition to having park and rides, the BRT is also superior in that it is a green belt with thousands of new trees and landscaping across the Valley, and it offers a pedestrian and biking path. **27-6**

The so-called Citizens Organized for Smart Transit have proved themselves to be both covert and duplicitous. These are obstructionalists with no real interest in improving mobility in the San Fernando Valley and do not represent the majority of Valley residents. **27-7**

Sincerely,

Roger Christensen

Roger Christensen
14335 Huston St. #205
Sherman Oaks, Calif 91423

Response to Comment Letter 27

Comment 27-1
The comment is acknowledged for the record.

Comment 27-2
The commenter's observation that the parking facilities along the Orange Line will reduce auto trips by facilitating use of the BRT project is acknowledged for the record.

Comment 27-3
The commenter's observation that the fixed guideway will benefit bus operations by removing buses from the congested roadways is acknowledged for the record.

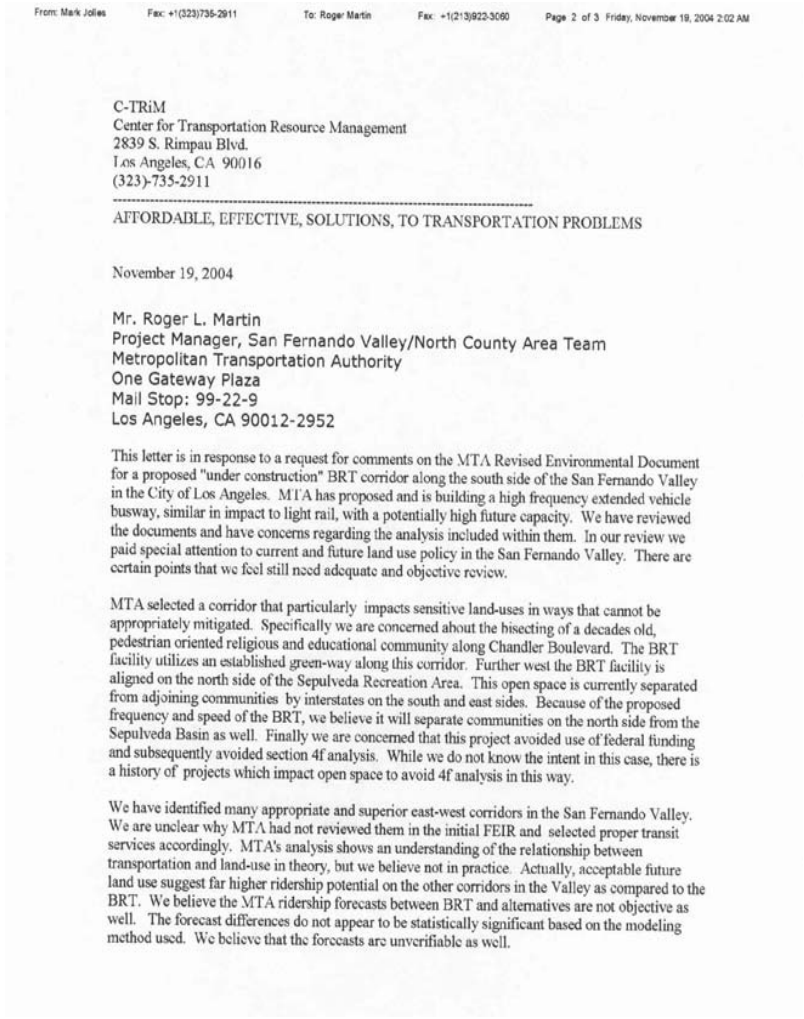
Comment 27-4
The comment is acknowledged for the record.

Comment 27-5
The comment is acknowledged for the record.

Comment 27-6
This is correct. The BRT project includes extensive landscaping throughout the right-of-way as well as pedestrian and bike paths.

Comment 27-7
The comment is acknowledged for the record.

Comment Letter 28



From: Mark Jolles Fax: +1(323)735-2911 To: Roger Martin Fax: +1(213)922-3060 Page 2 of 3 Friday, November 19, 2004 2:02 AM

C-TRiM
Center for Transportation Resource Management
2839 S. Rimpau Blvd.
Los Angeles, CA 90016
(323)-735-2911

AFFORDABLE, EFFECTIVE, SOLUTIONS, TO TRANSPORTATION PROBLEMS

November 19, 2004

Mr. Roger L. Martin
Project Manager, San Fernando Valley/North County Area Team
Metropolitan Transportation Authority
One Gateway Plaza
Mail Stop: 99-22-9
Los Angeles, CA 90012-2952

This letter is in response to a request for comments on the MTA Revised Environmental Document for a proposed "under construction" BRT corridor along the south side of the San Fernando Valley in the City of Los Angeles. MTA has proposed and is building a high frequency extended vehicle busway, similar in impact to light rail, with a potentially high future capacity. We have reviewed the documents and have concerns regarding the analysis included within them. In our review we paid special attention to current and future land use policy in the San Fernando Valley. There are certain points that we feel still need adequate and objective review.

MTA selected a corridor that particularly impacts sensitive land-uses in ways that cannot be appropriately mitigated. Specifically we are concerned about the bisecting of a decades old, pedestrian oriented religious and educational community along Chandler Boulevard. The BRT facility utilizes an established green-way along this corridor. Further west the BRT facility is aligned on the north side of the Sepulveda Recreation Area. This open space is currently separated from adjoining communities by interstates on the south and east sides. Because of the proposed frequency and speed of the BRT, we believe it will separate communities on the north side from the Sepulveda Basin as well. Finally we are concerned that this project avoided use of federal funding and subsequently avoided section 4f analysis. While we do not know the intent in this case, there is a history of projects which impact open space to avoid 4f analysis in this way.

We have identified many appropriate and superior east-west corridors in the San Fernando Valley. We are unclear why MTA had not reviewed them in the initial FEIR and selected proper transit services accordingly. MTA's analysis shows an understanding of the relationship between transportation and land-use in theory, but we believe not in practice. Actually, acceptable future land use suggest far higher ridership potential on the other corridors in the Valley as compared to the BRT. We believe the MTA ridership forecasts between BRT and alternatives are not objective as well. The forecast differences do not appear to be statistically significant based on the modeling method used. We believe that the forecasts are unverifiable as well.

28-1

28-2

28-3

Response to Comment Letter 28

Comment 28-1
The comment is acknowledged for the record.

Comment 28-2
As is detailed in the Final Environmental Impact Report, the project would be consistent with the previous and current use of the corridor for transportation purposes. Sensitive land uses would be buffered from the project by landscaping and soundwalls. Existing legal crossing points (i.e., crosswalks at signalized intersections) would be maintained, and therefore, access across the proposed busway would not be impaired.

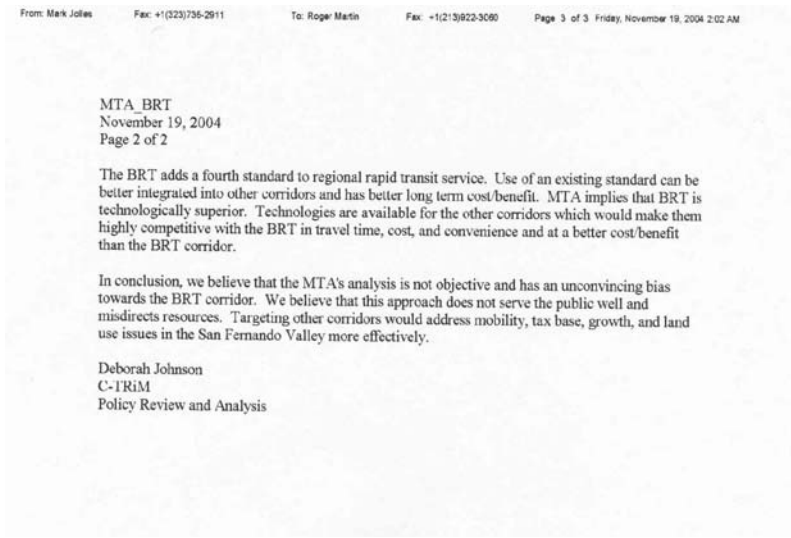
As part of the BRT, landscaping would be introduced in the median of Chandler Boulevard to mitigate localized land use impacts. On days of religious observance, special pedestrian crossings would be provided, one at Goodland Avenue and another at Agnes Avenue. Other enhancements for Chandler Boulevard include low, see-through fencing for pedestrian safety, 35 mile-per-hour speed limits, and left turn lanes.

Unlike the freeways that are cited in the comment, the proposed project would not create an imposing physical barrier between the Sepulveda Basin and communities on the north side of the Basin. The BRT would consist of an at-grade profile with signalized pedestrian crossings at all street crossings along the corridor. The project would not pose a substantially greater physical barrier than a two-lane, signalized at-grade roadway. Moreover, in addition to shifting patrons from automobile to public transit, the project would provide numerous pedestrian and bicycle amenities.

A Section 4(f) Evaluation is a federal requirement and is not required under CEQA. Because at the time of the preparation of the FEIR federal funds were under consideration, the FEIR provided a Section 4(f) Evaluation, and in fact there were no impacts on protected Section 4(f) resources by the Full BRT alternative. As stated on page 8-4.15-1, the Revised FEIR is strictly a CEQA document, and therefore, a Section 4(f) Evaluation is not required and was not conducted for the Rapid Bus alternatives.

Comment 28-3

Please see response 4.2.



From: Mark Jolles Fax: +1(323)736-2911 To: Roger Martin Fax: +1(213)922-3060 Page 3 of 3 Friday, November 19, 2004 2:02 AM

MTA_BRT
November 19, 2004
Page 2 of 2

The BRT adds a fourth standard to regional rapid transit service. Use of an existing standard can be better integrated into other corridors and has better long term cost/benefit. MTA implies that BRT is technologically superior. Technologies are available for the other corridors which would make them highly competitive with the BRT in travel time, cost, and convenience and at a better cost/benefit than the BRT corridor.

28-4

In conclusion, we believe that the MTA's analysis is not objective and has an unconvincing bias towards the BRT corridor. We believe that this approach does not serve the public well and misdirects resources. Targeting other corridors would address mobility, tax base, growth, and land use issues in the San Fernando Valley more effectively.

28-5

Deborah Johnson
C-TRiM
Policy Review and Analysis

Comment 28-4

MTA has not introduced a fourth "standard" to regional rapid transit service. The BRT "standard" per national and international definitions includes expedited bus transit services using a variety of techniques that range from arterial Metro Rapid Bus service with signal priority, stations, branding, wayside information, and some exclusive travel lanes up exclusive right-of-way full BRT like the Orange Line. Many BRT services have both exclusive and arterial operation further supporting the integration of these services into one standard.

Comment 28-5

The MTA and its consultants made every effort that the Rapid Bus alternatives in the Revised FEIR were evaluated in an objective manner using the same evaluation criteria as those used for the Full BRT in the FEIR. As is detailed in the Revised FEIR, the analysis was the result of an extensive planning process that concluded that the Full BRT would be the best transportation improvement in the San Fernando Valley. The analysis of the Rapid Bus alternatives did include other corridors as requested by the commenter.

Comment Letter 29

-----Original Message-----
From: BHA in L.A. [mailto:bha_in_la@yahoo.com]
Sent: Friday, November 26, 2004 11:14 AM
To: MTA's" "Martin, Roger
Cc: MTA's Michel, KevinJ.; BHA in L.A.
Subject: Comments, EIR SFV East-West Transit Corridor (SCH1995101050)

This file is written in the Windows-1252 character set. If "box" characters like ☐ appear, then reset your computer's encoding to Windows U.S. On MS-Internet Explorer browsers, the encoding may be reset through the View menu**;** point your mouse to that item on the menu bar, and select (click) it, then click Encoding, then click Windows U.S.

Comments Upon the Entire Environmental Impact Report for the San Fernando Valley East-West Transit Corridor (SCH1995101050), Including the Draft Revised Final Environmental Impact Report

1.0 Comment (reference: procedures) **29-1**

I hereby *integrally incorporate* by reference in every "comment" of mine the "discussion" of that comment which follows it.

Response to Comment Letter 29

Comment 29-1

Copies of the Draft Revised FEIR were made available on October 22, 2004 at every public library in the San Fernando Valley, Metro's Dorothy Peyton Gray library in downtown Los Angeles on the 15th Floor of the Metro Building; and available for viewing in PDF format at Metro's website at www.metro.net/projects_plans.

1.0 Discussion of comment**:**

Therefore, I contend, MTA must respond to the *totality* of issues presented both in the labeled "comment" and its "discussion". The discrete (not discreet) labeling system's primary purpose is to identify to staff where I deem a comment to exist and its core issue, not in the least to invite staff to indulge in summary dismissal of comments by ignoring the supporting discussion. Each of my comments together with its discussion constitutes a "package deal"**;** the pair may not be "unbundled". Your responses, in whatever form, *must* include all subsidiary issues.

Wherever I include a "(reference: ...)" element in a comment, that to no degree limits any comment's scope. Its sole purpose is merely to aid staff in understanding my comments and in identifying their relevance.

1.1 Comment (reference: Due-process clause, 14th amendment, U.S. Constitution)

When did the first party other than MTA and its agents *actually, provably* first receive a copy of the draft RFEIR? When did the first party other than public agencies *actually, provably* first receive a copy of the draft RFEIR? If that date is later than October 24th, 2004, then what is the revised circulation period to which the public is entitled?

29-1

2. Comment

The status of the subject EIR is somewhat analogous to the status of a court trial which was declared a mistrial. From this analogy alone, the lead agency may not validly argue that new comments offered upon the contents of the old FEIR, the adoption of which was vacated, are invalid. In which respects is the subject EIR's status similar to that of a mistrial, and in which respects is this status different from that of a

29-2

Comment 29-2

The commenter contends that the status of these further proceedings on FEIR are somewhat analogous to a declaration of a mistrial in a trial court and, therefore, MTA improperly limited public comments to the Revised FEIR. As discussed in the Revised FEIR, the CEQA Guidelines authorized MTA to limit public comments to the Revised FEIR. Thus, MTA properly requested that comments be limited to the Revised FEIR. Therefore, because MTA appropriately proceeded under CEQA Guidelines by limiting comment responses to the Revised FEIR, this situation should not be analogized to a mistrial.

mistrial, does MTA contend? What legal reasoning does MTA adduce to support its contentions here? Does MTA legally rebut, to a standard which can withstand every appellate-court challenge, that comments received upon the subject EIR's entire scope are, instead, invalid, and if so, comprehensively how does it do so**?**

2. Discussion of comment**:**

Where a mistrial is declared, no conclusion has been reached, a new trial must be held in order to reach a conclusion, and although a party may rely upon the undisputed testimony presented at the preceding trial, *all* of it must be presented to the triers of law and fact. The triers of law and fact must consider *all* of the presented testimony. No party may omit testimony at the new trial merely because it was presented and undisputed at the previous trial, and the triers of law and fact must consider all of the testimony, old and new alike.

At the new trial, a transcript of the previous proceeding is not always read to a jury instead of examining and cross-examining the witnesses anew. The parties's attorneys, need not necessarily repeat their direct and cross examinations of witnesses verbatim. Indeed, the new testimony might lead to new avenues of cross-examination. Certainly, the transcript of the trial attorney's previous summations would not be read to a jury.

No final conclusion can be reached upon the admissibility of new evidence and argument upon the unrevised content of the FEIR based upon this analogy alone, but both the analogy and the admissibility issue need thorough analysis and discussion.

3. Comment

What are all of the salient points of conclusion of the law-review article authored by Professor Eric Goldman entitled "Legal Adequacy of Environmental

29-2

29-3

Comment 29-3

The commenter requests that a 1982 law review article on environmental law be reviewed and synopsized in a comment response. The commenter does not explain why this synopsis would be relevant to the Revised FEIR. A copy of the article is not included with the comment. Since the article is from 1982, it would not contain information relevant to the specific alternatives being compared in the Revised FEIR. In addition, as noted by the commenter, a number of amendments to CEQA and its Guidelines, as well as new case law interpreting them, have occurred in the interim. Accordingly, the request to perform this legal research and analysis is respectfully declined.

Discussions in Environmental Impact Reports" in Volume 3, Number 1 (Fall 1982) of the *UCLA Journal of Environmental Law & Policy,* notwithstanding whether the lead agency judges CEQA to require this discussion**?** Do not combine the response to this comment with the response to any other comment.

3. Discussion of comment**:**

Note that most (both in number and degree) of Professor Goldman's points remain valid despite the passage of much time, the intervening amendments to CEQA, and the intervening evolution of CEQA case law, such as the opinion in "Goleta II".

29-3

4. Comment

What are all of the conclusions which may be drawn from a comprehensive application to the subject project and its full EIR of the arguments and conclusions presented in Professor Goldman's 1982 article, especially his subdivision A., Project Description, but not at all limited to that section**?** Do not combine the response to this comment with the response to any other comment.

4. Discussion of comment**:**

29-4

5. Comment

What is the design capacity of the busway in the proposed options (BRT) which incorporate one? Use all criteria reasonably applicable to all project facets and locations.

5. Discussion of comment**:**

Both busway-endogenous and busway-exogenous criteria must be included. Thus, the capacity limits imposed by the busway.

29-5

Comment 29-4

The commenter refers again to the 1982 law review article and asks what conclusions may be drawn from the application of the arguments and conclusions therein, especially a portion regarding project descriptions. Please see response to Comment No. 29 – 3. Again, since the commenter does not specify with adequate particularity the conclusions or arguments which should be addressed and the relevance to the Revised FEIR, the request to perform this legal research and analysis is respectfully declined.

Comment 29-5

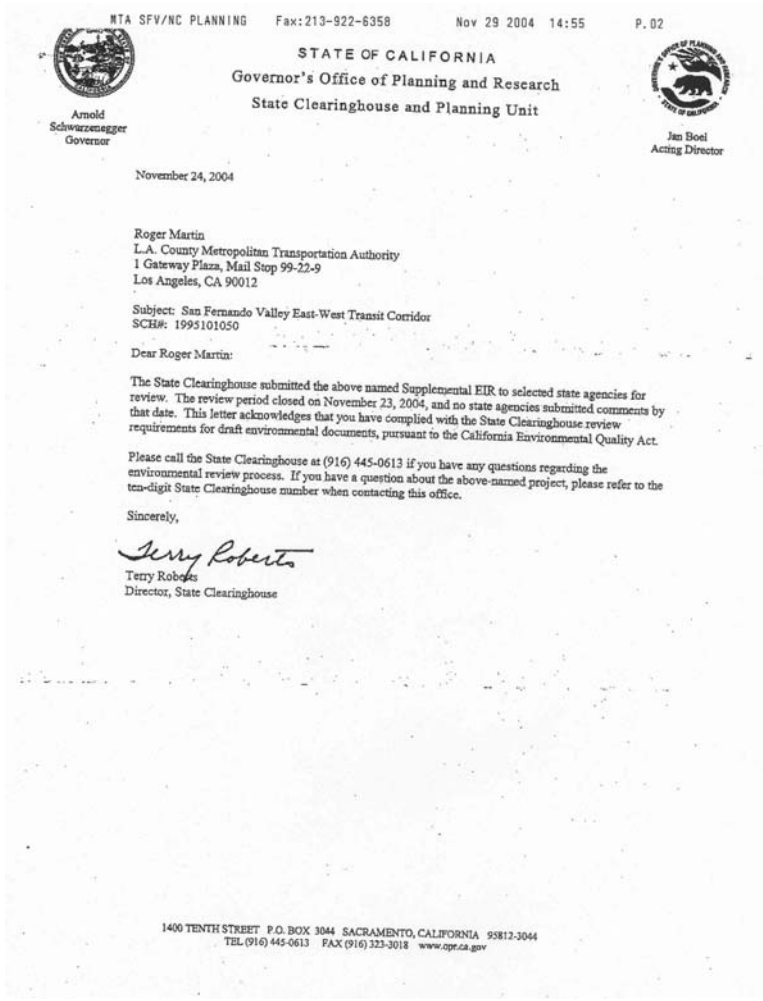
The theoretical design capacity of the busway represents the maximum number of buses that could be operated on a two-lane facility, one lane in each direction. It would normally be stated as an hourly capacity. The busway itself can accommodate many more buses per hour than can the at-grade crossings of arterial streets, so the crossings become the limiting factor in terms of the number of buses per hour that could be operated on the busway.

The theoretical capacity of the at-grade crossings is a function of the total number of articulated buses that could pass through the signalized crossings, which in theory could be one bus through every signal cycle. Most of the signals operate on sixty-second cycles, so this would generally be one bus per minute. The MTA does not plan to operate buses

at one-minute headways, so the design capacity of the busway will not be a constraining factor to bus operations. This bus operations plan is

determined by MTA on the basis of need and resources, in coordination with the Los Angeles Department of Transportation (LADOT), which manages the traffic system in the City.

Comment Letter 30



MTA SFV/NC PLANNING Fax:213-922-6358 Nov 29 2004 14:55 P.02

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Arnold Schwarzenegger
Governor

Jan Boel
Acting Director

November 24, 2004

Roger Martin
L.A. County Metropolitan Transportation Authority
1 Gateway Plaza, Mail Stop 99-22-9
Los Angeles, CA 90012

Subject: San Fernando Valley East-West Transit Corridor
SCH#: 1995101050

Dear Roger Martin:

The State Clearinghouse submitted the above named Supplemental EIR to selected state agencies for review. The review period closed on November 23, 2004, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

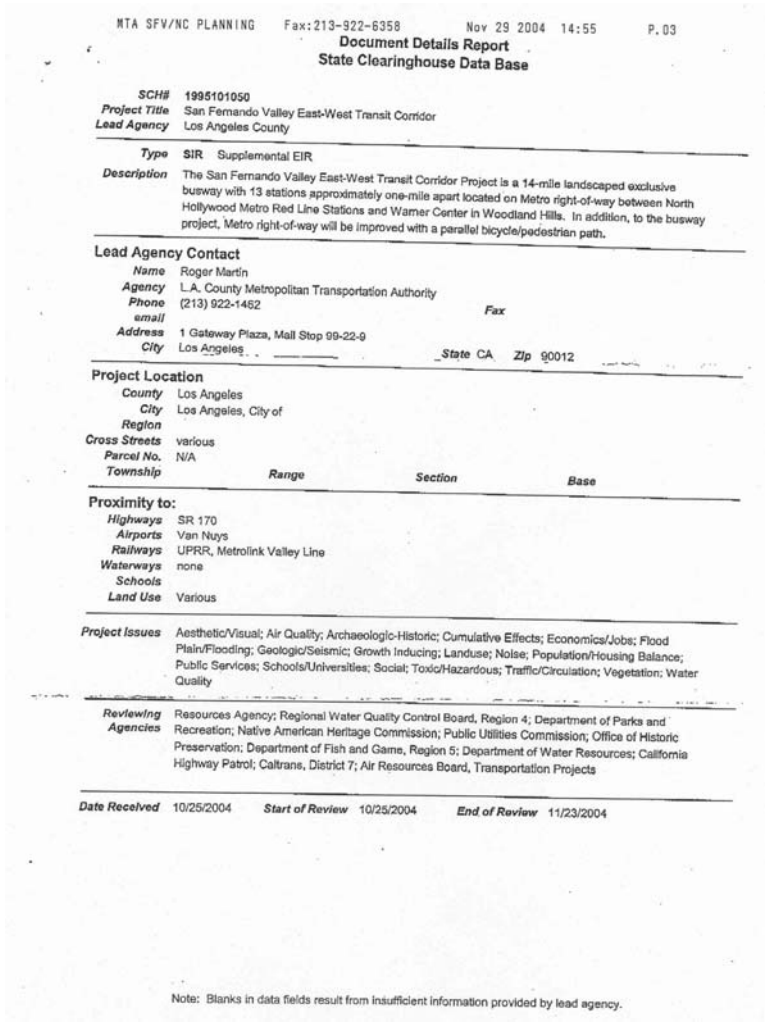
Terry Roberts
Director, State Clearinghouse

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Response to Comment Letter 30

Comment 30-1

The comment is acknowledged for the record.



MTA SFV/NC PLANNING Fax:213-922-6358 Nov 29 2004 14:55 P.03

Document Details Report
State Clearinghouse Data Base

SCH# 1995101050
Project Title San Fernando Valley East-West Transit Corridor
Lead Agency Los Angeles County

Type SIR Supplemental EIR
Description The San Fernando Valley East-West Transit Corridor Project is a 14-mile landscaped exclusive busway with 13 stations approximately one-mile apart located on Metro right-of-way between North Hollywood Metro Red Line Stations and Warner Center in Woodland Hills. In addition, to the busway project, Metro right-of-way will be improved with a parallel bicycle/pedestrian path.

Lead Agency Contact
Name Roger Martin
Agency L.A. County Metropolitan Transportation Authority
Phone (213) 922-1462 **Fax**
email
Address 1 Gateway Plaza, Mail Stop 99-22-9
City Los Angeles **State** CA **Zip** 90012

Project Location
County Los Angeles
City Los Angeles, City of
Region
Cross Streets various
Parcel No. N/A
Township **Range** **Section** **Base**

Proximity to:
Highways SR 170
Airports Van Nuys
Railways UPRR, Metrolink Valley Line
Waterways none
Schools
Land Use Various

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Cumulative Effects; Economics/Jobs; Flood Plain/Flooding; Geologic/Seismic; Growth Inducing; Landuse; Noise; Population/Housing Balance; Public Services; Schools/Universities; Social; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 4; Department of Parks and Recreation; Native American Heritage Commission; Public Utilities Commission; Office of Historic Preservation; Department of Fish and Game, Region 5; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Air Resources Board, Transportation Projects

Date Received 10/25/2004 **Start of Review** 10/25/2004 **End of Review** 11/23/2004

Note: Blanks in data fields result from insufficient information provided by lead agency.