

In addition, the boundaries set in subsection (c), taken in context with (b), prohibit the placement of the station planned at Coldwater Canyon – both the East- and Westbound boarding areas, located West and East of Coldwater, respectively, are within one mile of the Tujunga Wash.

31-39

Although subsection (a) was changed, MTA is undoubtedly aware that similar changes were *not* made to subsections (b) and (c), and there is a distinct potential that these laws will be enforced, whether by way of litigation or otherwise, to exclude the aforementioned busway stations.

b. **Bus Weight** – In the time/speed/distance tables in North American Bus Industries’ proposal to MTA<sup>26</sup> for the 60-foot CNG artic’s that MTA proposes to utilize on the Orange Line, we note that the total vehicle weight for the “service load” test is shown as 63,050 pounds. This calculation is normally done with buses topped off with liquids, a driver on board, all seats occupied, and three standees per square meter of standing space, and an assumption that all humans weight 75 kilograms.

31-40

However, California Vehicle Code Section 35554 states: “Notwithstanding Section 35550, the gross weight on any one axle of a bus shall not exceed 20,500 pounds.” Even if the weight of this bus was evenly spread over all three axles – which is virtually never the case, particularly with buses – this bus would still be in violation of VC35554, with an average weight of 21,016 pounds per axle. In the real world, a loaded bus will exceed this statutory axle weight limit by thousands of pounds on the most heavily weighted axle.<sup>27</sup> The purpose of this axle weight limit is manifestly to prevent excessive wear and tear on the California roads.<sup>28</sup>

In sum, it appears that this bus, with a service load, will likely be far over the legal maximums for street use in California.<sup>29</sup>

<sup>26</sup> There was no ability to comment on this issue prior to the finalization of the EIR because the decision to procure these buses was made long after the FEIR was adopted by the MTA Board in February 2002 – see MTA press release, “MTA Moves Forward with the Purchase of 200 High-capacity Buses and a Major Design/Build Contract for the San Fernando Valley Metro Rapid Transitway,” April 3, 2003, [http://www.mta.net/press/2003/04\\_April/mta\\_046.htm](http://www.mta.net/press/2003/04_April/mta_046.htm).

<sup>27</sup> Unlike the “load factor” requirements of the Consent Decree that settled *Labor/Community Strategy Center v MTA*, the axle weight requirement is not applied to an average of buses over a period of 20 minutes or an hour, but is applied to each bus each and every minute it is on a public road.

<sup>28</sup> MTA is evidently well aware of, this factor judging by the staff proposal to the MTA Board on July 22, 2004, Agenda item number 29 – “Issue Change Orders in an Amount Not-to-Exceed \$2,000,000 for Design and Construction to Upgrade the Busway Pavement Structural Section.”

<sup>29</sup> While MTA will be the owner of the actual Orange Line busway and we are aware of any legal issue with MTA operating overweight vehicles on its own property, these buses will be crossing dozens of public road streets on their Orange Line end-to-end trips and will be operating on the streets at the extreme Western end of the line approaching Warner Center.

**Comment 31-40**

Refer to Response 20-100 for discussion of bus weight.



MTA should perform weight tests with a certified axle scale to determine the maximum load that will allow this bus to be legally operated and adjust the Orange Line operating plan and costs accordingly.

31-40



APPENDIX I  
EVALUATION OF REQUIREMENTS FOR CHANGE BY CHAPTER

Chapter/Title	Evaluation of Degree of Changes Required	
Summary	Refer to specific chapters below for required modifications in Summary	
1 Purpose and Need	The Study Area is clearly defined as the entire San Fernando Valley, but the vast majority of the discussion of improvements focuses solely on the Orange Line and North-South feeder service to the Orange Line. There needs to be a discussion of the role of both guideway and non-guideway transit and their relationships to transit needs in the <i>entire</i> Valley.	31-41
2 Alternatives Considered	Again, there needs to be a shift from almost exclusive focus on guideway transit to a discussion of the total transit needs for the entire Valley, not just a narrow slice thereof. Rapid bus is one obvious alternative to be added, but other transit improvement features, including timed-transfer operations, additional express bus service, and fare reductions, as methods to increase transit use, need to be introduced and discussed.	31-42
3 Transportation Setting, Impacts, and Mitigation	The focus needs to better describe transit travel, existing and potential, in the Valley. The obvious greatest potential for increase in transit usage is from current transit users and those Valley residents, workers, and visitors with characteristics most similar to existing transit users. The difficulties of transfers in the Valley due to long headways, and options to improve transit options, need more discussion. Route-by-route ridership for MTA and other transit service operators' routes, along with route length, headway, hours/miles of revenue service, hours of operation, and other information should be provided. Major transfer points should be identified with volume, directions, and time information. The study area is the entire Valley, not just a narrow slice in the Southern portion of the flatland.	31-43
4 Affected Environment and Environmental Consequences	Once again, the focus must shift from a narrow band in the Southern portion of the flatland to the entire Valley. Since we have new alternatives, all individual environmental impacts need to be studied and results reported and compared. For the non-Orange Line-only alternatives, the positive financial impact to MTA (and the property tax base) from the conversion of the former Burbank Branch property to other use and the proceeds from the sale(s) or lease(s) of such land should be disclosed. At a minimum, there should be a discussion of the lease income forgone by MTA when the 109 Burbank Branch leases were terminated (discussion to be placed either here and/or Chapter 6). The study of air quality needs to be tailored to the impact of improved local bus transit in reducing not just automobile trips.	31-44  31-45

**Comment 31-41**

Existing transportation facilities throughout the entire Valley are discussed at 8-1.1.2. In addition, subsection 8-1.1.4 discusses transportation problems for east-west arterials in the entire Valley. Also, guideway and non-guideway planning efforts are discussed for context purposes in subsection 8-1.2.

**Comment 31-42**

New information has been added to the section titled Alternatives Considered, Chapter 8-2 concerning multiple-route Rapid Bus alternatives. The Court of Appeal rejected COST's assertion that fare reduction must be considered as a separate alternative. See comment response 31-33. The Court of Appeal in requiring MTA to consider a multiple-route Rapid Bus alternative in further proceedings on the FEIR has determined that this will result in the consideration of a reasonable range of feasible alternatives to the project. Therefore, additional alternatives need not be considered. Other than merely referencing the alternatives of timed-transfer operations, additional express bus and fare reductions, the commenter does not state why these alternatives merit examination. Like fare reduction discussed in comment response 31-33, timed-transfer operations and additional bus transfer service are similar to the No Build, TSM, BRT and multiple-route Rapid Bus alternatives discussed in the Revised FEIR. Therefore, examination of these additional suggested alternatives is not required under CEQA or the Court of Appeal's decision pursuant to which this Revised FEIR is being prepared.

**Comment 31-43**

The Transportation Setting, Impacts and Mitigation section was expanded to provide additional information



on transportation conditions in the San Fernando Valley. Streets throughout the Valley are described in Section 8-3.1.1.2 and the impact of future growth on Valley travel corridors was added to Section 8-3.2.1. The description of transit service in the Draft EIS/EIR had always covered the entire San Fernando Valley, not “just a narrow slice in the Southern portion of the flatland.”

**Comment 31-44**

Selling the right-of-way for profit is a hypothetical approach that assumes the right-of-way would not be used for transportation purposes. MTA would still own the right-of-way for some type of transportation project in the future should the Board choose another alternative.

**Comment 31-45**

The air quality analysis in the Revised FEIR uses the California Air Resources Board (CARB) EMFAC7F emissions factor model to estimate motor vehicle emission factors. EMFAC7F was the most recently approved models when the Final EIR was prepared. The emission factors that were used in the air quality analysis take into account the range of model years that would be operating in the buildout year, including older vehicles that would emit more pollutants than newer vehicles. This mix of vehicles is based on DMV registrations. Thus, the emission factors used in the air quality analysis takes into account older vehicles that emit more pollutants than newer vehicles.



	but automobile trips by the lowest income residents, who drive cars that can be 100 or even 1,000 times "dirtier" than cars driven by higher-income "choice" riders.
5 Construction Impact	Obviously, the non-Orange Line alternatives will have no impacts from construction of the Orange Line guideway et al, but could have increased impacts in some particulars if an additional bus operating yard needs to be constructed, or if existing bus yards need to be expanded. The relatively minor construction work to add Rapid Bus lines (bus stops, loops in the roadway, etc.) and other improvements, such as timed transfer centers, must be analyzed for these alternatives.
6 Purpose and Need and Financial Comparison of Alternatives	This chapter will be almost entirely new. There are numerous changes to the costs originally presented in the old EIR due to events that have occurred since the "cut off" time for its publication. Various costs bearing on the Orange Line not comprehended in the old EIR must be included, such as the cost of the Red Line North Hollywood Station portal on the West side of Lankershim, the "Boeing" park-and-ride lot (and its operating costs), and repayment, with interest, of the funds improperly taken from the Proposition 108 Rail Passenger Bond and not utilized for rail purposes. The metrics for comparison of alternatives will also be significantly changed (see discussion at III, above.)

31-45

31-46

31-47

**Comment 31-46**

The operation of the three new Rapid Bus alternatives would not require the construction of a new bus maintenance/operation yard in the San Fernando Valley. The minor construction impacts of the three new Rapid Bus alternatives were analyzed in Section 8-5 of the Revised FEIR.

**Comment 31-47**

Please see Responses 31-17 and 31-18.



APPENDIX II  
 PROBLEMS WITH MTA PROCEDURE FOR  
 SELECTION OF NEW RAPID BUS LINES

In turning to the current MTA plan for Rapid Bus<sup>30</sup> – adopted by the MTA Board on the same day that it adopted the SFV BRT – it is notable that MTA does not propose one additional East-West Valley arterial for Rapid Bus. Since both the East-West arterial streets and the East-West bus routes are generally far longer than the North-South ones, sometimes well over twice as long, this appears unusual, because the longer the trip a passenger is taking, the greater the time savings by using Rapid Bus. Rapid Bus on Roscoe was included in the previous MTA Rapid Bus preliminary plans, but was dropped by the most recent adopted list (except as a component of the “Reseda” Rapid Bus line between Reseda and Supulveda, a distance of approximately four miles).

Why are no Valley East-West arterial streets or bus lines proposed for Rapid Bus?

Going to the details of the MTA staff report on “Metro Rapid Expansion Program,” on pp. 1-2 of “Metro Rapid Expansion Program,” under “2 Selection Process” – “Identify Potential Candidate Lines,” the following process statement of process appears:

“The LRTP (TAR: Long Range Transportation Plan) Metro Rapid conceptual plan evaluated all MTA lines with over 10,000 weekday boardings based on the idea that a critical threshold of ridership would be required to justify and support both Metro Rapid and local service on a given corridor. This resulted in a shortlist of 41 line corridors and was considered sufficient at that time. However, since then there has been a desire on the part of both MTA and Municipal Operators to consider “Muni” line corridors as possible Metro Rapid candidates based on the premise that certain corridors had the necessary characteristics to support Metro Rapid service and provided necessary network linkages.

“Initially, a lower ridership level of 5,000 weekday unlinked passenger boardings was considered the threshold for Metro Rapid consideration, recognizing that most Muni lines were shorter than MTA lines. However, working sessions with MTA Planning and Operations staff suggested using a new threshold based on unlinked weekday passenger boardings per mile of route in order to factor out the effect of the overall route length. The candidate selection was modified to reflect this approach.

“Minimum thresholds for Phase II were established at 500 weekday passenger boardings per mile of route with a minimum route length of 10 miles in order to ensure that the necessary ridership levels and opportunities for significant travel time savings were met. A secondary consideration, for possible inclusion, was given to routes with boardings per route mile of 400 to 500 as noted in Exhibit 1. Thirty-six candidate lines were selected for evaluation in the end.”

<sup>30</sup> Metro Rapid Expansion Plan, MTA Board Meeting, February 28, 2008, item 31.

31-48

31-49

**Comment 31-48**

See Response 31-49.

**Comment 31-49**

Mr. Rubin refers to a particular list of lines and whether or not they met the 10,000 daily boarding threshold, or 500 riders per line mile and 10-mile minimum route length criteria. The list included Lines 94, 150, 156 and Line 561.

In response, all four lines met the 10,000 daily boarding threshold as well as the 500 boardings per route mile and 10 mile route length criteria and, thus, all four lines were included in the Metro Rapid Program. One caveat is that only a portion of Line 156 was included because it duplicated, to some extent, Metro Rapid Lines 761, 704, and 754.

Mr. Rubin also refers to four lines that he feels should have passed the 10,000 boardings per day threshold – Vanowen, Victory, Topanga Canyon, and Van Nuys.

In response, only Van Nuys (which was included as a Metro Rapid corridor) met the 10,000 or more boardings per day threshold. Topanga Canyon had approximately 2,000 daily boardings. Victory and Vanowen, although considered one line, are in fact two separate corridors. Both lines are operated by one set of buses and ride-checked as one line. As individual lines, however, neither met the boarding threshold. Moreover, they did not meet the boardings per mile threshold of 500 after each was evaluated with respect to employment density, population density, and transit dependency. In fact, neither Victory, Vanowen, nor Topanga Canyon had boardings per mile greater than 400. Therefore, none of the above lines were not



This is a curious approach, for several reasons:

1. Generally, speaking, the longer the route, the higher the ridership. One would think that offering the benefits of Rapid Bus to the greatest number of riders would be one consideration in making decisions for deployment of Rapid Bus.
2. Generally speaking, the longer the route, the longer the average passenger trip length. Obviously, the longer the trip length, the greater the benefit from speed improvements of a given percentage. For example, if we assume that a bus now has an average speed of 12 mph, and that Rapid Bus will offer a 25% speed increase (approximating the speeds for current MTA local and Rapid Bus lines), then the Rapid Bus average speed will be 15 mph. For a passenger traveling two miles (approximately half the average MTA bus unlinked trip length), the time of travel is decreased from ten minutes to eight minutes, a savings of two minutes. For a passenger traveling eight miles (approximately double the average MTA bus unlinked trip length), the time of travel is decreased from forty minutes to 32 minutes, a savings of eight minutes. Obviously, the time savings of Rapid Bus is far more important for a passenger taking longer trips than shorter ones.

One would think that an obvious criterion for Rapid Transit route selection should be the actual benefit that individual travelers would receive. For a passenger making a two-mile trip, the extra wait for a Rapid Bus would not likely be worthwhile if a "regular" local came along first, particularly if the "regular" bus has stops near to the transit trip origins and destinations. For someone taking a longer trips, say on Wilshire, waiting an extra two or three minutes for a Rapid Bus would certainly be the right decision – especially if there are real-time, dependable "next bus will arrive in # minutes" signs.

3. Not considering average trip lengths has two impacts. First, it ignores the point made above, that Rapid Bus time savings is more important to passengers taking longer trips. The second effect is even worse. Lines with longer average trip lengths tend to have fewer boardings. MTA schedules bus trips primarily on the basis of peak loads. If people take longer trips, they stay on the bus longer and, therefore, all else equal, there are fewer boardings on bus lines with longer average trip lengths.

Therefore, for two buses with similar peak loads, the line that has the longer average trip length will almost always have fewer boardings per hour. Therefore, not only does not considering average trip length ignore the greater benefits to passengers who take longer trips, but, in fact, the boardings per hour rule that MTA established actually actively works *against* routes with passengers who take longer trips being considered for Rapid Bus treatment.

The obvious necessary change is to discard the boardings per mile criterion and to substitute for it a combination of average passenger load (passenger miles/revenue vehicle miles) and average trip length.

4. Almost all of the Rapid Bus lines adopted by MTA are relatively close to straight line routes, some with minor bends. There are almost no lines with right angle bends, where,

31-49

included in the Potential candidate line list, Exhibit 1 of the February 2002 Metro Rapid bus Board Report.



31-49

for example, where a bus could start heading North on a North-South Rapid Bus line, then turn East on to an East-West Rapid Bus alignment to deliver people to a major job center, such as downtown, during rush hour, with a reversed pattern in the afternoon rush.

In this regard, please refer to Exhibit 1, MTA's Rapid Bus candidate listing. Checking it for the SFV bus lines listed above, there are four listed, out of the total of 55:

1. Line 94 – San Fernando Road
2. Line 150 – Conoga Park/Warner Center/Ventura Boulevard/Universal City – The vast majority of this line (all but approximately 3.5 miles) is on Ventura Boulevard, which already has Rapid Bus – Line 750
3. Line 156 – Panorama City/Van Nuys/North Hollywood/Hollywood/LA City College
4. Line 561 – Sylmar/San Fernando Metrolink Station/Van Nuys Boulevard Limited/Getty Center Museum/UCLA/LAX City Bus Center/Aviation Metro Rail Station Express (Lines 156 and 561 both run on Van Nuys, although 156 stops at Roscoe in the North. Once the 561 leaves Van Nuys in the South, it operates primarily on Freeways, where Rapid Bus isn't applicable.)

Therefore, there were only two streets that did not already have Rapid Bus evaluated in the Valley, San Fernando Road, near the extreme Northeast of the Valley, and Van Nuys, a North-South route pretty much in the middle of the Valley.

This raises a question: What happened to the all the other lines in the list above? Did not a single one of them reach the former 10,000 daily boardings standard, or the new 500 riders per line mile standard?

This appears doubtful, given analysis in the original EIR for the busway project (FEIR, page II-10):

"In the east-west direction, the heaviest bus ridership occurs along Vanowen Street, Victory Boulevard, and Ventura Boulevard. North-south, the heaviest ridership occurs along the southern segment of Topanga Canyon Boulevard and Van Nuys Boulevard. Bus ridership along each of these arterials totals more than 10,000 passengers each day. The east-west corridor has a daily bus ridership in the range of 40,000-50,000 passengers<sup>31</sup>."

Excluding Ventura, which already has Rapid Bus, there are obviously four lines that pass the old 10,000 boardings/day test – Van Owen, Victory, Topanga Canyon, and Van Nuys – from MTA's own FEIR for the Orange Line. Van Nuys did make the MTA "Possible Candidate Lines" list,

<sup>31</sup> FEIR, Volume 1, 1-1.2.3 Public Transportation, page 1-10.



but the other three should have been considered unless they failed 500 boardings/mile test or the lowered 400 boardings/mile test.

31-49

The segment of Topanga Canyon Boulevard where transit operates is approximately nine miles, and the total line length is approximately thirteen miles<sup>32</sup>. Therefore, even if one assumes the minimum, 10,000 boardings, that is still approximately 750-800 boardings per route mile (more on Topanga itself), which would appear to place it just under the middle of all of the 55 transit streets on the MTA candidate list. However, this line isn't on the list. It is not certain why.

Perhaps MTA didn't place this line on the list because the portion of the route on Topanga Canyon is only nine miles and thus failed the ten mile test. However, if this was the reason, then certainly Rapid Bus on Ventura Boulevard, which actually runs on Topanga Canyon at its Western end, could be joined up with Rapid Bus on Topanga. The ridership is definitely there, and would allow this heavily utilized transit street to be used for Rapid Bus. Moreover, the Topanga-Ventura Connection is a heavily utilized one for transfers, making this an even more obvious linking. Indeed, MTA route 150, the Ventura Boulevard "local" line, *does* operate on Topanga Canyon North to Wyandotte Street, North of Sherman Way.

Indeed, it appears as though the rules – including the ten mile rule, if that is what caused Topanga Canyon to be rejected from consideration for Rapid Bus – appear to be somewhat flexible.

Returning to Victory and Van Owen, both appear to be just less than twenty miles in length. This would produce boardings/mile above the 500 cutoff, and well above the 400 cutoff, even if we assume that ridership is the absolute minimum 10,000.

Yet, none of these were even placed on the Exhibit 1 – Potential Candidate Lines list.

For Victory, it may be that it was disqualified because the Burbank-Chandler BRT alignment runs fairly close to it for all of its length and literally right next to it for approximately four to five miles.

There is certainly no such policy stated in the MTA Board report on Rapid Bus. One of the first two Rapid Bus lines, Line 720 on Wilshire/Whittier, runs quite literally "right on top" of the Red Line, or within a block of it, from Western Avenue to downtown Los Angeles. One of the next six streets scheduled for Rapid Bus is Vermont Avenue, where the Red Line runs from Wilshire to Hollywood. Line 60 – Long Beach Avenue – scheduled in the second phase to be implemented, largely parallels the Blue Line for its entire length.

In any event, regardless of why Victory and Van Owen did not even make the preliminary list for evaluation in MTA's procedure two years ago, those reasons do not appear to have any validity

<sup>32</sup> There are several different bus lines that operate on all or part of Topanga Canyon and some routings may have changed during the time period of and since this analysis. The current lines that operate on Topanga are MTA lines 150, 166, 168, 245, 426, and 750; Antelope Valley line 787; LA-DOT Commuter Express lines 422 and 575; Santa Clarita line 791, and Simi Valley line C.



San Fernando Valley East-West Transit Corridor Project  
 Significant Considerations For Completion Of CEQA Requirements

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now -- Rapid Bus *should* be evaluated for these and other SFV arterials as part of this new EIR process<sup>33</sup>.

31-49

<sup>33</sup> In his declaration of August 9, 2004 in opposition to COST's petition for Writ of Supersedeas or Other Appropriate Stay Order and Request for Immediate Temporary Stay Order, and Request for Immediate Temporary Stay before Second Appellate Division Seven, Rex Gephart, MTA Director of Regional Transit Planning and its primary proponent of Rapid Bus, states, at ¶ 3, "Under my direction, MTA has conducted a study to determine the appropriate streets to deploy Rapid Bus throughout the County of Los Angeles ("County"). In February 2002, I generated a report of the study, which is entitled, "Metro Rapid Expansion Program" and was attached to the February 21, 2002 board report that I prepared. A copy of the board report and the Metro Rapid Expansion Program report are collectively attached hereto as Exhibit 'J.'" (Not enclosed to this document as it is readily available to MTA personnel.)

In his ¶ 5, he states, "As part of the study, MTA developed a testing protocol consisting of two thresholds that each candidate route was analyzed by. The testing protocol consisting of two thresholds that each candidate route was 10 miles long and had at least 500 patron boardings per mile. (Exhibit J, Attachment A, p. 2.) The threshold of routes 10 miles long was chosen because any route less than 10 miles could not achieve any noticeable significant speed improvement to the patrons. (See Id.) I consulted with FTA, the City of Los Angeles Department of Transportation and several transportation consultants--Suisman Urban Design and Transportation Management and Design. All of us agreed to define a "noticeable significant speed improvement" as a 20% travel time savings. We further agreed that such a time savings would likely attract a significant number of new riders by having faster service and creating more bus trips with the same operating period as standard bus service. Both of these benefits would justify the expense of Rapid Bus. This prediction was verified by the Rapid Bus demonstration lines on Ventura Blvd. and Wilshire Blvd."

COST members closely followed the progress of the Rapid Bus study described by Mr. Gephart in detail when it was underway. It was, and is, our belief that the metrics utilized for determination of lines to be considered and to be operated as Rapid Bus routes were and are seriously flawed, as discussed above. What is at issue here, however, how the decision was made to not include several San Fernando Valley bus lines. Specifically, it appears that a key criterion set forth in Mr. Gephart's ¶ 5 is nowhere to be found in the board report nor the Metro Rapid Expansion report ("Report") and that the actual methodology utilized by MTA to select the lines to be considered for implementation as Rapid Bus lines did not follow the protocol in the Report.

In his ¶ 5, Mr. Gephart discusses the "20% travel time savings" and how it was utilized as a selection criterion. While the board report and the Metro Rapid Expansion Program report in his Exhibit "J" discuss and document the selection methodology in great detail, nowhere is there any mention of any "20% travel time savings" or any criterion remotely close to such, on any of their 24 pages, nor is there any indication in any of the many exhibits of the use of such a criterion.

We find it absolutely inconceivable that any competent technical report of this type would totally omit, absolutely totally fail to have the least sliver of evidence, to support such an important element of the selection methodology.

It is also interesting to note that several of the lines recommended in the Metro Rapid Expansion Program have significant sections outside of the City of Los Angeles, which, at the time the report was prepared, was the only political jurisdiction that had implemented the traffic signal preferences that are such an important part of the speed advantages of Rapid Bus as it has been implemented in Los Angeles. Yet, there is no discussion of traffic signal preference, or the difficulty or risk of being able to attain it, anywhere in this report. This would appear to have very significant potential impact on the travel time saving potential of these lines.

In his ¶ 9, Mr. Gephart states, "The problem with Rapid Bus running on existing streets with other traffic is that Rapid Bus performance suffers as a result of congestion. This observation was noted in the Final Report Metro Rapid Demonstration Program. (53 AR 12750.) Congestion along Devonshire St., Roscoe Blvd., Sherman Way, Vanowen St., Victory Blvd., Oxnard St., Burbank Blvd and Chandler Blvd. would prevent Rapid Bus from achieving the 20% travel time savings goal."

This observation is fascinating to long-time Los Angeles residents, who will be pleased to know that congestion that could impair Rapid Bus lines from achieving 20% travel time savings goals evidently does not exist on Wilshire Blvd. and Ventura Blvd., the first two Rapid Bus lines, nor will it ever exist on South Broadway, Vermont, Pico/Venice, Florence, Soto, Van Nuys, Central, Santa Monica, Hawthorne, Long Beach, Hollywood/Fairfax, Western, Beverly, Vermont/LaCienega, Atlantic, San Fernando, South Sepulveda, West (Continued)



31-49

Also, it appears that there are other Valley bus lines that would pass the 10,000 boardings and/or 500/400 boardings per route mile tests. MTA does not currently release information on boardings by route, primarily because MTA stopped collecting this and other vital data some years ago. For decades, MTA and its predecessor, the Southern California Rapid Transit District, had produced the *Quarterly Line Performance Trends Report*, which had incredibly detailed data, presented in a time line over a decade or more, for every MTA family of lines.

The last *Line Performance Trends Report* was distributed February 25, 1998, and the last data was collected in December 1997, so this does not have current information, and ridership patterns, of course, change over time.

However, in reviewing the data, we find at least two other Valley East-West bus routes that appear to meet one or both of the above tests:

1. Line 152, Fallbrook/Roscoe/Vineland/Alameda, showed 10,605 boardings when studied on Monday, October 21, 1996. At the time of the ridecheck that produced this boarding count, this line was about 25 miles long, which would put the boardings/mile at approximately 425, under the 500, but over the 400, cutoff points. On the heavier utilized portions of the route – which probably means excluding most of Fallbrook and Alameda – the ridership per mile is almost certainly well in excess of the 400 boardings per revenue mile minimum.
2. Line 163, Sherman Way/Hollywood Way/Hollywood, showed 10,198 boardings when studied on Thursday, February 20, 1997. This line is approximately 27 miles, which puts it just under the 400 lower limit. However, on the more heavily utilized portions of the line, particularly along Sherman Way, it almost certainly would be well above the 400 passenger/mile minimum.

Finally, Line 180 – Hollywood/Glendale/Pasadena/Altadena/North Lake Avenue via Colorado Boulevard – which is partially in the Valley, appears to also have the ridership to be considered for Rapid Bus status.

Olympic, Garvey-Chavez, Manchester, Crenshaw/Rossmore, Torrance/Long Beach, or Lincoln, the lines recommended for Rapid Bus service in the report (See Table A, "Proposed Metro Rapid Corridor Phasing").

In his ¶ 10, he states, "Not considering congestion, to achieve a Rapid Bus goal of 20% travel time savings, traffic signal priority must be at least 50/50. This means that a vehicle approaching the intersection will have a 50% chance of getting a green light when traveling in the east-west direction versus traveling in the north-south direction. . . I determined the signal priority limit of 50/50 by experience with the existing nine Rapid Bus Routes in the County."

Again, there is absolutely no mention what-so-ever about any "50/50" rule in the "Metro Rapid Expansion Report." The interesting question that this raises is, how did Mr. Gephart determine the 50/50 rule, required to provide the 20% travel time savings, when seven of the nine "existing Rapid Bus Routes in the County" did not exist until after they were implemented as recommended in the "Metro Rapid Expansion Program" report?

There appears to be reason to question exactly when the "20% travel time savings" and the "50/50" rules first appeared – and no reason at all to believe that they existed when the "Metro Rapid Expansion Program" report was prepared and the decision to not consider any San Fernando Valley East-West bus lines for Rapid Bus service was made.



It is unfortunate that we do not have more current ridership data available from MTA. What we do know is that overall bus ridership has increased significantly from 1996 and 1997 to the current day, so it is not at all unreasonable to believe that one or both of these lines, and perhaps others, exceeded the 400 boardings per mile test, at least on the East-West portions of their travel.

**31-50**

To say the least, there appears to be a bit of conflict between the methodology that MTA staff states is utilized in the report to the MTA Board, and the methodology that is actually utilized. Evidently not all the lines that met the test for qualifying for consideration were considered.

**31-51**

**Comment 31-50**

For equal comparison purposes, data that was available during the original study was used.

**Comment 31-51**

The comment is acknowledged for the record.



**Comment Letter 32**

**Comment 32-1**

The comments are acknowledged for the record.

MTA SFV/NC PLANNING Fax:213-922-6358 Dec 7 2004 6:11 P.02

NOV 24 2004

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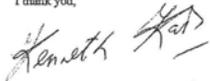
RE: COMMENTS ON DRAFT REVISED FINAL E.I.R. for  
SAN FERNANDO VALLEY EAST-WEST TRANSIT  
CORRIDOR dated Oct 2004 (Volume 4 Chapter 8)

Dear Sir:

- I support Rapid Bus Network for the following reasons:
- a) COST SAVINGS: \$72-92 million vs. \$300 million for the Orange Line
  - b) Transport more people
  - c) There are 43 Schools along the Orange Line-Concern for student safety.
  - d) Time: Rapid Bus takes only 1.7 minutes longer than the Orange line
  - e) Quality of Life Issues -- environmental,air quality,traffic delays on Orange Line

**32-1**

I thank you,



Kenneth Katz





**Metro**

San Fernando Valley  
East-West Transit Corridor  
REVISED FEIR



**Metro**

San Fernando Valley  
East-West Transit Corridor  
REVISED FEIR