



Southern California's Leading Transit Advocacy Group

P.O. Box 567 * San Fernando, CA 91341-0567

Voice: 818.362.7997 * Fax: 818.364.2508

www.transitcoalition.org

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18 October 2010

Dolores Roybal Saltarelli, Project Manager
Metro
One Gateway Plaza, MS 99-22-02
Los Angeles, CA 90012-2932

RE: Metro Regional Connector DEIR/DEIS Comments

Dear Ms. Roybal Saltarelli:

The Transit Coalition strongly supports the Metro Downtown Regional Connector. Our comments describe the DEIR/DEIS items we support and the items that need to be changed. Also, the project needs to ensure bike access through station entrances, as directed by the Metro Board resolution.

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We believe that it is vital to keep the 5th/Flower Station. 7th/Metro is already crowded during peak hours; with the addition of traffic from the Expo, Foothill and Eastside lines, this key station will be severely overcrowded. The station on Flower, with portals at 5th and/or 4th, serves the densest concentration of high-rise buildings in the Western U.S. Many of these commuters would switch to transit if it is close to their destination, but not if they have to walk several blocks up to Bunker Hill. This would reduce congestion and improve air quality. 5th is actually three blocks away from 7th due to Wilshire, the same as between Pershing Square and Civic Center.

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We support an underground alternative with inclusion of all four stations.

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Sincerely,

Bart Reed
Executive Director

CN15**Responses to Comments from The Transit Coalition, Reed, Bart****Response to Comment CN15-1**

Thank you for your comment. Support for the project is noted. Please refer to Responses to Comments CN15-2 through CN15-4, below, for detailed responses to concerns raised by the commenter.

Response to Comment CN15-2

Station entrances proposed under the refined Locally Preferred Alternative would accommodate bicycle access in accordance with Metro policies.

Response to Comment CN15-3

Support for the Flower/5th/4th Street station is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative without the Flower/5th/4th Street station as the Locally Preferred Alternative. The deletion of the station was done in an effort to reduce the cost of the project while still meeting the project's purpose and need. An enhanced pedestrian walkway connecting the 4th/Flower Streets area to the existing 7th Street/Metro Center Station would be constructed on Flower Street to improve access to the Financial District. Metro understands the importance of serving the Financial District and believes that the Locally Preferred Alternative still meets the purpose and need of the project despite the station deletion. Deletion of the Flower/5th/4th Street station would result in minimal ridership losses because most riders would use the 2nd/Hope Street station or 7th Street/Metro Center Station, which would service the Financial District. After the October 28, 2010 meeting, the Metro Board of Directors directed staff to meet with the Financial District stakeholders to discuss options for privately funding the Flower/5th/4th Street station, but no funding sources were identified. However, the design of the Locally Preferred Alternative would not preclude a station at 5th and Flower Streets from being built as a possible future, separate project.

Response to Comment CN15-4

Thank you for your comment. Support for an underground alternative with four stations is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.



October 18, 2010

Ms. Dolores Roybal Saltarelli
 Los Angeles County Metropolitan Transportation Authority
 One Gateway Plaza, MS 99-22-2
 Los Angeles, CA 90012
 Via E-mail: roybald@metro.net

Mr. Ray Tellis
 Federal Transit Administration
 888 South Figueroa Street, Suite 1850
 Los Angeles, CA 90017
 Via E-mail: ray.tellis@dot.gov

*Re: State Clearinghouse No. 2009031043
 Los Angeles County Metropolitan Transportation Authority
 Regional Connector Transit Corridor Project
 Draft Environmental Impact Statement/Environmental Impact Report*

Dear Ms. Roybal Saltarelli and Mr. Tellis:

FAST is a non-profit organization dedicated to designing and supporting the implementation of short-term strategies to reduce traffic congestion in Los Angeles by optimizing current transit infrastructure and expanding use of public transit in order to improve our mobility and quality of life.

Pursuant to CEQA/NEPA, we submit the following comments with regard to the Regional Connector Transit Corridor Project:

Metro has proposed three alternatives for the Regional Connector as follows:

- At-Grade Emphasis LRT Alternative;
- Underground Emphasis LRT Alternative; and
- Fully Underground LRT Alternative.

FAST supports the Fully Below-Grade LRT Alternative. We strongly believe that this alignment will best serve employers, employees, students, residents and visitors around the region to and from the downtown area. The project will improve existing at-grade intersections and the flow of traffic downtown, while making public transit more accessible and useful for existing and future users.

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FAST Letter of Support for the Regional Connector
October 18, 2010
Page Two

Metro has successfully engaged the entire community of stakeholders for the Regional Connector. While there would be some temporary disruption of surface street traffic during the construction phase for stations, the long-term impact of the Fully Below-Grade LRT Alternative would best serve the maximum number of people, providing circulation through downtown in the least intrusive way possible. This option is the safest for a highly pedestrian-used area.

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We understand that Metro staff currently recommends eliminating the station proposed at 5th and Flower Streets due to potential cost overruns for the Fully Underground LRT Alternative. While FAST supports the 5th and Flower Street Station as important service to a residential, financial, tourist and cultural area currently underserved by transit, we would not want continued inclusion of this potential station to jeopardize Metro's application for federal New Starts program funding for the entire Regional Connector project.

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However, FAST believes that a station in this area, in the heart of the Financial District and adjacent to the Central Library, is an important way to completely connect the different areas of Downtown Los Angeles. FAST therefore requests that the 5th and Flower Street station continues to be included in the Final EIR and future studies to ensure that this station is not completely eliminated at this time.

FAST congratulates Metro staff members Ann Kerman and Dolores Roybal-Saltarelli, with whom we have worked closely during the development and outreach process for this important project. The outreach efforts of this team and of The Robert Group have been exemplary.

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We look forward to our continued work with Metro for the long-term success of the Regional Connector project and the Fully Below-Grade LRT Alternative. Please feel free to contact me with regard to any additional support FAST can provide.

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Sincerely,

Hilary Norton
Hilary Norton
Executive Director
FAST – Fixing Angelenos Stuck in Traffic

cc: Anne Kerman
Metro Board of Directors
FAST Board of Directors

CN16**Responses to Comments from Fixing Angelenos Stuck in Traffic, Norton, Hilary****Response to Comment CN16-1**

Thank you for your comment. Support for the Fully Underground LRT Alternative is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

Response to Comment CN16-2

Thank you for your comment. Support for the Fully Underground LRT Alternative is noted.

Response to Comment CN16-3

Support for the Flower/5th/4th Street station is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative without the Flower/5th/4th Street station as the Locally Preferred Alternative. The deletion of the station was done in an effort to reduce the cost of the project while still meeting the project's purpose and need. An enhanced pedestrian walkway connecting the 4th/Flower Streets area to the existing 7th Street/Metro Center Station would be constructed on Flower Street to improve access to the Financial District. Metro understands the importance of serving the Financial District and believes that the Locally Preferred Alternative still meets the purpose and need of the project despite the station deletion. Deletion of the Flower/5th/4th Street station would result in minimal ridership losses because most riders would use the 2nd/Hope Street station or 7th Street/Metro Center Station, which would service the Financial District. After the October 28, 2010 meeting, the Metro Board of Directors directed staff to meet with the Financial District stakeholders to discuss options for privately funding the Flower/5th/4th Street station, but no funding sources were identified. However, the design of the Locally Preferred Alternative would not preclude a station at 5th and Flower Streets from being built as a possible future, separate project.

Response to Comment CN16-4

Thank you for your comment.

Response to Comment CN16-5

Thank you for your comment. Support for the Fully Underground LRT Alternative is noted. Metro looks forward to continued coordination with Fixing Angelenos Stuck in Traffic (FAST) regarding the Regional Connector project.

October 18, 2010

Dolores Roybal Saltarelli
Metro
1 Gateway Plaza
Mail Stop 99-22-5
Los Angeles, CA 90012

Dear Ms. Roybal:

On behalf of over 2,000 dues-paying members, we are writing to express our opposition to the construction of the Downtown Regional Connector. We see this as yet another misguided project whose exorbitant costs far outweigh its transit benefits. Bus riders simply cannot see this project – which duplicates existing rail connections – as the slightest bit beneficial when it is proposed as part of a Long Range Transportation Plan that reduces bus service and raises fares over the next three decades. We would support a revamped and expanded TSM alternative that would invest not only in shuttle bus service serving downtown, but would also increase Rapid and Local service, keep fares low and fund bus-only lanes county-wide. If this option is not seriously considered, then we support the No-Build alternative.

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Here are our core objections to the project:

- **The Regional Connector duplicates existing rail service at the same time that bus service will see significant reductions in bus service.** Metro has cited duplication of service as one of the major justifications for the reduction of bus service, claiming it cannot afford to maintain this perceived inefficiency in the bus system. Yet the Regional Connector will not create any new connections – it will simply duplicate service with the only benefit being the reduction of travel time by 7 to 12 minutes, and with an enormous construction price tag.
- **The Regional Connector has a minimal transit benefits relative to cost:** As the Draft Environmental Impact Report (DEIR) states, shortening travel time between various downtown Metro Rail stations would yield between 12,300 and 17,400 transit trips per day. Given the high capital cost of the project, it means each new transit daily trip generated by the introduction of this line will cost \$11 or \$12 per day¹ compared to \$1.40 per new rider if the same funds were invested in bus expansion following the strategies of the Bus Riders Union’s Civil Rights consent decree.²
- **Spending \$1.25 billion on the Regional Connector is an enormous missed opportunity to improve the bus system:** Leaving aside operations expenses for the Regional Connector, the total annualized capital cost of the project – ranging from \$52 million for the At-Grade Emphasis alternative to \$72 million for the Underground Alternative – would generate enormous benefits if invested instead in bus capital and service expansion following the strategies employed during the

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BRU's civil rights consent decree with MTA. *Investing these annualized costs using consent decree strategies could increase system ridership between 100,000 and 140,000 new transit trips per day each year for the next 25 years.*³ This beats the Regional Connector by more than 800% in new riders generated per year. Considering that the Regional Connector will not begin operation until 2019 whereas bus expansion strategies could be implemented as early as FY2013, investing these funds in "Consent Decree strategy" bus expansion would outperform the Regional Connector by 1100% in terms of ridership over the period of FY2013 to FY2035.

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- **The burden of rail construction, including cost overruns, has been born by bus riders.** As you know all too well, the Civil Rights Consent Decree was born largely out of Metro's practice of raiding the bus system budget in order to cover capital expenses of Rail project – especially all-too-frequent construction cost overruns. As it is, the project's construction budget depends heavily on not-yet-secure funding from the Federal Transit Administration New Starts program. Even after that, there is a \$173 million hole in the construction budget of the staff-recommended Underground Alternative. Moreover, with all the complications endemic to Subway construction, we have no reason to believe the DEIR's 10% built-in cost overruns will be sufficient. Given the agency's track record of disrespect for bus riders – both very recent, in the form of service cuts and fare increases, and going back to the early 1990's – we have every reason to believe bus riders will end up paying the price as Metro siphons bus-eligible funds to fill these holes and in turn raises fares and cuts service. Proponents of the 30/10 Initiative argue that this acceleration will save money, but the federal government will not provide money for cost overruns in the form of a loan or a grant.
- **The Regional Connector, as a priority project within the 2009 Long Range Transportation and the 30/10 Initiative, will exacerbate the existing operations crisis and require fare increases and service cuts.** For many years, Metro has claimed that fare reductions and service cuts are necessary to close a structural operations deficit in the bus system budget. Some Metro staff member and Board members have blamed this operations deficit on bus expansion required by the BRU's civil rights consent decree with MTA. Yet the agency's current rail expansion plan – of which the Regional Connector is an important component -- will only exacerbate the operations crisis. First because the agency is building what it does not have the money to operate. The major *new* source of Metro Rail operations funds – Measure R 5% rail operations – will not generate enough in 2035 to cover the West Side Subway operations costs plus all of the other rail projects outlined in the 2009 Long Range Transportation Plan.⁴ The agency plans to deal with this by 1) raising fares repeatedly; and 2) siphoning off additional money from the bus system budget, which means service cuts. *The result is that LA County's very low income, overwhelmingly Black, Latino and Asian bus riders will bear the burden of this project in its impact on their bus service and by paying higher fares.* If the 30/10 Initiative is implemented as an acceleration plan, this will accelerate this operations crisis into a 10-year rather than 30-year timetable.

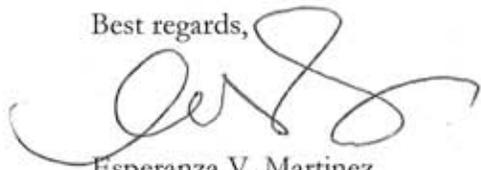
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For all these reasons, we urge the Board of Directors to adopt the "No-Build Alternative" and cease pursuing this project.

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Best regards,



Esperanza V. Martinez
Lead Organizer, Bus Riders Union



Barbara Lott-Holland
Co-chair, Bus Riders Union

¹ Using annualized costs of \$52-\$72 million over 40 years, and ridership numbers from: Regional Connector DEIR, Table ES-1. Page ES-15.

² Using Consent Decree Strategies, (\$1.40/boarding: Marginal capital and operations, minus operating revenue per new passenger). BRU and Ryan Synder. The Bus Riders Union Transit Model. 2009.

³ Ibid. and MTA Ridership Statistics, <http://www.metro.net/news/pages/ridership-statistics/> (10/14/2010)

⁴ Based on 2009 Long Range Transportation Plan projections of Measure R revenue over time, the Measure R 5% Rail Operations fund will be \$105 million in 2035. The projected annual operating cost of the Subway in 2035 is \$67- \$150 million, \$31 million of which will be covered through reductions of bus service solely on the Wilshire Corridor.

CN17

Responses to Comments from Bus Riders Union, Martinez, Esperanza V.

Response to Comment CN17-1

The Regional Connector's primary purpose is to close a two-mile gap in the Metro light rail network and eliminate transfers from many transit trips. Many existing transit riders would benefit from shorter trip times to, from, and through downtown Los Angeles as a result of the Regional Connector. The Federal Transit Administration New Starts Cost-Effectiveness Index for the proposed project, as of the publication of the Draft EIS/EIR, was \$13.68 (a "medium-high" rating), which indicates that the anticipated transportation benefits of the project would be great enough to justify the projected cost. Refer to Chapter 6, Cost and Performance Consideration and Summary Comparison of Alternative, of this Final EIS/EIR for updated information regarding the Locally Preferred Alternative. Connections with intersecting bus lines would be made at the new stations and, as noted in Section 4.17.3.5 of the Draft EIS/EIR and this Final EIS/EIR, the Regional Connector project does not involve any cuts in bus service or fare increases. Metro notes the Bus Riders Union's support for the TSM Alternative, and secondary support for the No Build Alternative. Additional shuttle bus service and bus-only lanes would fail to address the two-mile gap in the light rail system in a way that reduces transfers and improves trip times, and would not provide adequate capacity in the downtown area for the volume of transit passengers anticipated in the coming decades.

Response to Comment CN17-2

Although the Regional Connector would be located near the heavy rail Metro Red and Purple Lines, the primary purpose of the project is to eliminate transfers on the light rail system. New connections between the Metro Gold, Blue, and Expo Lines would be created. Trips from Pasadena to Long Beach, or East Los Angeles to Culver City (once the Expo Line opens) currently require two transfers. By linking these unconnected light rail lines in the Metro system, the Regional Connector would eliminate these transfers and allow a one-seat ride. Travel time savings would range from 7 minutes to 20 minutes or more, depending on the time of day. This constitutes a cost-effective enhancement of transit service, rather than a duplication.

Response to Comment CN17-3

The Regional Connector would shorten travel times between Metro Rail stations system-wide, and would place three new stations in downtown Los Angeles. In addition to the 17,000+ new daily transit trips generated by the Regional Connector, many existing transit trips would be improved with fewer transfers and faster travel times. Approximately 90,000 passengers per day would use the Regional Connector in the year 2035. As mentioned in Response to Comment CN17-1, the Federal Transit Administration cost-effectiveness rating for the project, as of the publication of the Draft EIS/EIR, was \$13.68, which indicates substantial transit benefits relative to cost. In addition to the ridership benefits, the Regional Connector could also assist community revitalization and economic development. Refer to Chapter 6, Cost and Performance Consideration and Summary Comparison of Alternative, of this Final EIS/EIR for updated information regarding the Locally Preferred Alternative.

Metro designated the Fully Underground LRT Alternative as the Locally Preferred Alternative in part because it would address the need to reduce transfers system-wide and provide additional transit capacity in the downtown area. Many of the major streets in the downtown area already

carry their maximum practicable volume of buses. Further increases in transit capacity in the downtown area require the use of other modes, such as underground light rail. Buses have and will continue to play an important role in the regional transit system. However, buses cannot meet every transit need and purpose.

Response to Comment CN17-4

The Regional Connector would provide benefits to transit patrons who transfer to the rail system because fewer transfers on the rail system would be needed. Modeling indicates that some bus riders would begin using the rail system in lieu of bus trips once the Regional Connector is built because of the increased reliability and speed. In addition to creating new trips, the Regional Connector would improve trip times and reduce transfers on existing trips. Approximately 90,000 riders per day would use the Regional Connector 16 years after it is projected to open (year 2035), and this figure is expected to grow further in subsequent years. Metro would create new connections with the bus system at the new Regional Connector stations, which would benefit transit riders across Los Angeles County. Implementation of the Regional Connector would not involve reductions in bus service, as noted in Section 4.17.3.5 of the Draft EIS/EIR and this Final EIS/EIR, and would not preclude separate bus system improvements from being made.

Response to Comment CN17-5

As shown in Table 6-6 of the Draft EIS/EIR, bus operating funds would not be used to construct the Regional Connector. Table 6-8 of the Draft EIS/EIR showed that the costs of operating the Metro bus system would be the same for both the No Build Alternative and the build alternatives, demonstrating that the Regional Connector would not result in any cuts to the operating budget for the bus system. As mentioned in Responses to Comments CN17-1 and CN17-3, above, the Regional Connector's favorable FTA Cost-Effectiveness Index makes it competitive for New Starts funding. Metro is currently working to reduce the costs of constructing the Regional Connector. Metro has recently completed tunneling for the Eastside Extension Phase 1 within budget and on schedule, and believes that the contingency included in the Regional Connector's financial plan would be sufficient to cover any unforeseen expenses regardless of the outcome of America Fast Forward (formerly the 30/10 initiative). No fare increases are proposed to cover the Regional Connector's financing. Refer to Chapter 6, Cost and Performance Consideration and Summary Comparison of Alternative, of this Final EIS/EIR.

Response to Comment CN17-6

As discussed in Response to Comment CN17-5, above, Tables 6-6 and 6-8 of the Draft EIS/EIR showed that bus operating funds would not be used to construct or operate the Regional Connector, and bus operations funding would remain unaffected by the project. The Regional Connector project would not involve any bus fare increases or service reductions. Refer to Chapter 6, Cost and Performance Consideration and Summary Comparison of Alternative, of this Final EIS/EIR.

Response to Comment CN17-7

Support for the No Build Alternative is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

3435 Wilshire Boulevard
Suite 320
Los Angeles, CA 90010-1904



(213) 387-4287 phone
(213) 387-5383 fax
www.angeles.sierraclub.org

October 18, 2010

Ms. Dolores Roybal Saltarelli, Transportation Planning Manager
Metro
1 Gateway Plaza, Los Angeles, CA 90012
Via email regionalconnector@metro.net

Sierra Club comments on the Regional Connector Draft EIS/EIR

We've long sought this vital light rail connection across the downtown Los Angeles gap between the Blue-Expo and Gold Lines. It will provide one-seat convenience for riders to more destinations within downtown and for trips from one side to the other.

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We support the **Fully-Underground LRT Alternative**, and seek creative funding opportunities to **not eliminate the 5th and Flower station**, such as Propostion A and C for non-subway expenditures, or Los Angeles CRA funding.

Darrell Clarke
Angeles Chapter Conservation chair and Transportation co-chair
darrell@dclarke.org

CN18

Responses to Comments from Sierra Club, Clarke, Darrell

Response to Comment CN18-1

Thank you for your comment.

Response to Comment CN18-2

Support for the Fully Underground LRT Alternative is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. Metro is actively seeking ways to reduce the costs of the project, and is considering all available funding sources. Proposition A and C funds are largely unusable for the fully underground Regional Connector due to the voter-approved Metropolitan Transportation Authority Reform and Accountability Act of 1998. The City of Los Angeles would provide a portion of the local funding for the Regional Connector.



Oct. 18, 2010

FAX COVER

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**COMMENT ON DRAFT EIS/EIR
FOR REGIONAL CONNECTOR TRANSIT CORRIDOR PROJECT**

TO: METRO PLANNING GROUP
Dolores Roybal-Saltarelli

Via fax to:
Ginny-Marie Brideau
Project Manager
The Robert Group
323 669 9800

FROM: HIGGINS BUILDING HOA
108 W. 2nd Street, Los Angeles CA 90012

If questions or problems with transmission
please contact Joan Springhetti 213 621 7895