

February 10, 2022

Peter Carter, Project Manager
Metro
One Gateway Plaza, Mail Stop 99-22-6
Los Angeles, CA 90012

Submitted Electronically

RE: UCLA Formal Comments on the Sepulveda Transit Corridor Project during Public Scoping Period

Dear Mr. Carter:

The University of California, Los Angeles (UCLA) appreciates the opportunity to provide comments on Metro’s Sepulveda Transit Corridor (STC) project under the current scoping process. As a Trustee Agency for the STC project, the University actively participates in Metro’s planning process. While other UCLA entities and stakeholders may submit separate feedback, this correspondence represents UCLA’s formal comments under the STC scoping process.

UCLA ardently supports smart construction of the STC to better connect the Westside and the San Fernando Valley as well as other Metro lines across the metropolitan area. The completion of this critical project will improve quality of life throughout the L.A. region. Proper construction of the STC will provide much-needed and improved transit options to ensure Angelenos can access major employment, educational and cultural centers across Los Angeles. Therefore, UCLA strongly opposes Alternatives 1 and 2, and has grave concerns about Alternative 3 as currently presented. Alternatives 4, 5, and 6 are each significantly better for the Los Angeles region as a whole.

The STC not only will be one of the largest and most significant public works projects in the history of Los Angeles – and the nation – it is a once-in-a-lifetime opportunity to dramatically improve one of the worst traffic bottlenecks in the world. Therefore, we must get it right.

UCLA PREFERENCES AND CONCERNS REGARDING THE SIX PROJECT ALTERNATIVES

In reviewing Metro’s six project alternatives, UCLA has outlined below preferences as well as concerns for several of the options. These comments focus less on the technology or mode (i.e.,

monorail versus heavy rail transit) and rather on how the alternatives are designed and expected to perform. UCLA's comments are guided by the following principle:

Investing resources in a project as significant as the Sepulveda Transit Corridor must result in a system that enhances equity by transporting people directly to the places they need to go and that connects as seamlessly as possible with the existing rapid transit network, and does this while minimizing the impacts of operations on the neighborhoods through which it runs.

Building on our guiding principle, UCLA firmly believes that a successful Sepulveda Transit Corridor Metro line must include a station on the UCLA campus and a seamless connection to the Wilshire/Westwood Purple/D Line station. UCLA must be more readily and easily accessible to our Los Angeles community. As the region's premier public research university, including an exceptional medical center and the number one rated hospital in California, UCLA is also the third largest employer in L.A. County with a daytime population of over 84,000 students, faculty, staff, patients, and visitors. The campus is similar in size to the central business district of large U.S. cities. As a much-desired destination for the tens of thousands of Angelenos who are students, employees, patients and others, the university warrants an on-campus Metro station. Any STC proposal (such as Alternative 1 or 2) that relies on a shuttle to reach the campus would not attract maximum ridership potential and is destined to fail.

Alternative 1, which would create a monorail station on the west side of the 405 freeway and then connect to UCLA via a surface street shuttle bus, would so substantially increase the time it would take to travel from Van Nuys to campus that it would significantly decrease the incentive to use this transit option. As anyone who travels the streets of Westwood during rush hour knows, surface transportation is extremely slow. Taking a shuttle bus in mixed flow traffic could add 20 to 30 minutes (including transfers) to the time it would take to get from the Valley. Additionally, Alternative 1 does not provide a connection to the Wilshire/Westwood Purple/D Line station. **UCLA strongly opposes Alternative 1.**

Alternative 2, which would create a monorail station on the south side of Wilshire Boulevard at Veteran Avenue from which riders would cross a pedestrian bridge to connect to UCLA via an above-ground people mover, presents both similar and additional negative issues. While an above-ground people mover would, in theory, reduce the amount of time to get from the Wilshire station to campus, it still would add at least 10 to 15 minutes to travel time, reducing incentive to use it. Even worse, many stakeholders (including UCLA) would strongly oppose the construction, operational, and aesthetic impacts that such a people mover would have on the local community. Further, Alternative 2 assumes use of UCLA property for the automated people mover station, access to federal land on the south side of Wilshire, and the placement of a maintenance station in the vicinity. These presumptions have not been vetted or cleared

and are potentially insurmountable. Alternative 2 also fails to provide a seamless connection to the Wilshire/Westwood Purple/D Line station. **UCLA strongly opposes Alternative 2.**

Alternative 3 would tunnel from the proposed Getty Center station to a UCLA station, then surface south of campus and proceed via an aerial route to the corner of Wilshire and Veteran before crossing Wilshire and making its way back to the 405. While UCLA appreciates the effort to create an underground station on campus, Alternative 3 in its current form is also unacceptable.

First, the aerial portion of the route assumes that UCLA's Lot 36 at the corner of Wilshire and Veteran would be available for a large, above-ground monorail station. Such a station is in fact incompatible with UCLA's plans for the site. Second, the location of the station prevents a direct connection to the Purple/D Line Westwood Station and would require riders to exit one station, walk some distance along Westwood Blvd, and enter another station to connect from the STC Line to the Purple/D Line and vice versa. It is also unclear if the proposed aerial routes across Wilshire, through the Federal Building property, and back up to the 405 right-of-way would be viable and permissible. **Unless Alternative 3 is significantly amended** so that the route runs underground all the way from the Getty Center through UCLA and back to the 405 *and* provides a direct connection to the Purple/D Line Westwood station, **UCLA would oppose this option.**

The Alternatives 1-3 have other issues of concern not directly related to UCLA. These include stations that do not directly connect with other Metro rapid transit stations, the questionable policy of building another freeway-running transit line, and whether it is even safe to build and run such a line along the highly congested 405 corridor through the Sepulveda Pass. As for Alternatives 4, 5, and 6, UCLA considers these to be consistent with its guiding principle. These three alternatives all provide an on-campus UCLA station as well as a direct connection to the Purple/D Line Wilshire/Westwood station and other rapid transit lines. They provide a one-seat ride to UCLA.

Accordingly, Alternatives 4, 5, and 6 have the greatest potential to attract riders from automobiles to rapid transit. By connecting riders seamlessly to other Metro lines, including the Orange/G Line, the Purple/D Line, the Expo/E Line, and the future East San Fernando Valley Light Rail, in addition to Metrolink lines that connect to these Metro lines, these alternatives would provide easier and faster access to UCLA for Angelenos from areas far beyond the Westwood and West Los Angeles communities surrounding the campus and resolve current shortcomings of those lines with indirect access to UCLA.

Additionally, Alternatives 5 and 6 would especially minimize impacts on the communities through which they run.

ISSUES THAT METRO MUST ADDRESS DURING THE SCOPING PROCESS

Metro's goals and objectives for the STC are sound and UCLA addresses them throughout this comment letter. To highlight some specific alignments with Metro's goals and objectives for the STC, UCLA strongly recommends that Metro incorporate in its Environmental Impact Report (EIR) a rigorous accounting for the following topics.

1. Equity and Access (STC Goal "Improve Accessibility and Promote Equity")

Approximately 30% of UCLA students are the first in their families to attend college, and almost 50% of UCLA undergraduate students are on some form of financial aid, qualifying based on household income level. For a variety of reasons, many of these students do not live on the Westside and must commute to UCLA for their classes and other activities.

In addition to educating a diverse student population, UCLA is the third largest employer in L.A. County, providing tens of thousands of high-quality job opportunities. The university employs not only researchers, doctors, and professors, but also groundskeepers, electricians, food service workers, custodians, administrative staff, bus drivers and others, many of whom live some distance from campus, including in the San Fernando Valley, or the eastern portions of Los Angeles County, and beyond. For many employees in the service sector, mobility costs—both time and money—are a major barrier.

UCLA requests that Metro analyze transit equity for each alternative: How will each alternative make it easier for as many people as possible to work and be a student at UCLA? How will each alternative impact prospective students from traditionally underserved communities and households?

There is a deficit of housing equity in Los Angeles, and it is crucial to analyze how the greatest number of Angelenos may benefit or not benefit from whichever alternative is selected. Further, what reparative value does each alternative offer regarding mobility assistance to traditionally underserved employees and students, and their homes? The STC project offers substantial opportunity to remediate some of the past transgressions regarding mobility infrastructure investments. UCLA perceives there to be significant benefit to underserved populations via the provision of a rail connection between the San Fernando Valley and the Westside, and believes that Metro must study the equity impacts thoughtfully and comprehensively. Such analysis is critical and necessary.

An additional equity matter for Metro to consider is how the different alternatives propose to impact various neighborhoods.

2. Interconnectivity (STC Goal “Improve Mobility”)

Travel times are a primary metric for travelers and commuters. UCLA requests that Metro analyze ridership estimates and travel time differences between the six alternatives. This analysis should be both broad and granular. It should be broad in the sense that there will be network effects across the county and likely the region. For example, UCLA has conducted travel time analyses of trips originating at each Metro rail station in the system, comparing driving travel times to transit travel times, and found notable impacts deep into the San Gabriel Valley. The granularity comes within the local environs of Westwood, as the substitution of transit for previous driving trips partly depends on travel time, and there are differences in mode choice depending upon the type of connection from the Purple/D Line station that will be at Wilshire/Westwood up to the UCLA main campus. If there is a direct rail connection, ridership from the east will be much higher than if a commuter is required to surface and switch modes to reach UCLA. The STC project should not be studied as a stand-alone investment; interconnectivity to existing transit assets will ensure maximum return on investment (ROI) of the STC project, and Metro’s analysis should measure such ROI.

3. Operational Cost Additions and Other Cost/Benefit Analyses (STC Goal “Provide a Cost-Effective Solution and Minimize Risk”)

Metro should not only calculate or study the cost of the rail line itself, it should also study the cost of providing mobility from the San Fernando Valley to UCLA. For example, for Alternative 1 this involves operational costs related to the bus shuttle operation. These future operational plans were noted by one P3 submittal to include UCLA’s BruinBus service as the shuttle provider; UCLA has neither agreed to, nor is in the fiscal position to, provide such service. Any operational cost for the shuttle should be added to the alternative’s cost figures for the life of the project whether that be 50 or 100 years, and not assume that a third party would or could cover those costs. Including the capital and operational costs of the shuttle into the alternative’s cost structure provides an honest and apples-to-apples comparison to the alternatives which already provide a direct connection to the center of the UCLA campus. Real cost calculations for each alternative must be inclusive of the complete transit promises each alternative proposes.

Additionally, beyond purely monetary concerns, broader societal benefits and costs should be calculated and factored into the EIR. How many riders would use each alternative over the life of the project? Under each alternative, how much time would all projected riders save and how can that be quantified (i.e., human productivity metrics, quality of life)? Broader sustainability benefits and costs, including the benefits and costs to human health, should also be taken into consideration and incorporated

into the EIR.

4. GHG Reductions (STC Goal “Protect Environmental Resources and Support a Sustainable Transportation System”)

The state of California has greenhouse gas emission (GHG) reduction goals, as do UCLA, Metro, and L.A. County. Reducing GHG emissions means replacing driving trips with transit trips, and analyses should be undertaken to ascertain which alternative would remove the most metric tons of GHG emissions. To properly complete these calculations, the effort should utilize the most up-to-date data sets for number of employees, students, patients and special generators within the model that will be used to estimate emission reductions. UCLA requests that all GHG emission reduction calculations be transparent and explicit regarding methodology and data sources. UCLA has interest in reviewing all portions of this effort as well as the other metrics and analyses that Metro undertakes as it evaluates the various alternatives.

Besides these recommended, specific analyses for the environmental studies, it is imperative that any related benefit-cost analysis (BCA) determine how to integrate a calculation of transportation insecurity (e.g. via a transportation security index) into the BCA. Too often, social exclusion risk factors disenable travel by low-income individuals, who forego medical appointments and other important services. In general, the University recommends a holistic, modernized approach to the BCA so that all community and regional benefits are captured.

CONCLUSION

In summary, UCLA strongly opposes Alternatives 1 and 2 for the Sepulveda Transit Corridor because they do not include a direct on-campus UCLA station or a direct connection to the Wilshire/Westwood Purple/D Line. Without these two significant elements, the project will not meet its most important objectives. Without a UCLA station, the project will fail to attract its potential ridership or reduce the number of vehicles that could be diverted from local freeways and surface streets. Additionally, without a UCLA station and connection to the Purple Line, the project will fall short of its equity, diversity, and inclusion objectives by significantly increasing travel times to the heart of campus.

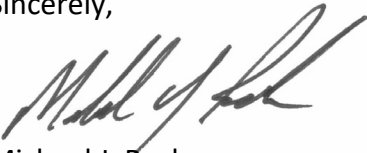
Alternatives 4, 5, and 6, by connecting directly from the San Fernando Valley to the Purple/D Line station at Wilshire and Westwood, would provide optimal levels of connectivity to the most important and busiest activity center along the entire project study area, that is, the UCLA campus. Such connectivity will not only dramatically reduce traffic on local surface streets and freeways, it will improve mobility and accessibility across the greater Los Angeles region. Alternatives 4, 5, and 6 would also significantly increase equity by providing fast and convenient access to UCLA from less affluent areas in L.A. County and beyond for students, employees,

patients, and visitors from such areas. UCLA not only provides the finest public university education in the nation, but its payroll includes high-quality positions at every level.

Finally, Alternative 3, which does provide a direct on-campus station, is problematic in that it does not include a seamless connection to the Wilshire/Westwood Purple/D Line station, assumes use of UCLA property to which the University has not agreed, and may face significant opposition from our neighbors in Westwood Village and the federal government in connection with its elevated portions. UCLA could support Alternative 3 if these issues are resolved.

In sum, the Sepulveda Transit Corridor project presents Metro with a golden opportunity to truly impact congestion in a significant positive way and improve the quality of life for residents of Southern California. But to realize this opportunity, Metro must build a project that maintains its long-term congestion reduction objectives, improvements in equity and access, and minimal operational impacts on neighborhoods. Only the alternatives including an on-campus UCLA station and seamless connection to the Purple/D Line at Wilshire and Westwood can realize this opportunity and meet Metro's own objectives. Los Angeles and her people deserve nothing less. We cannot squander this momentous opportunity. Let's get it right and build a Sepulveda Transit Corridor that works for all of Los Angeles.

Sincerely,

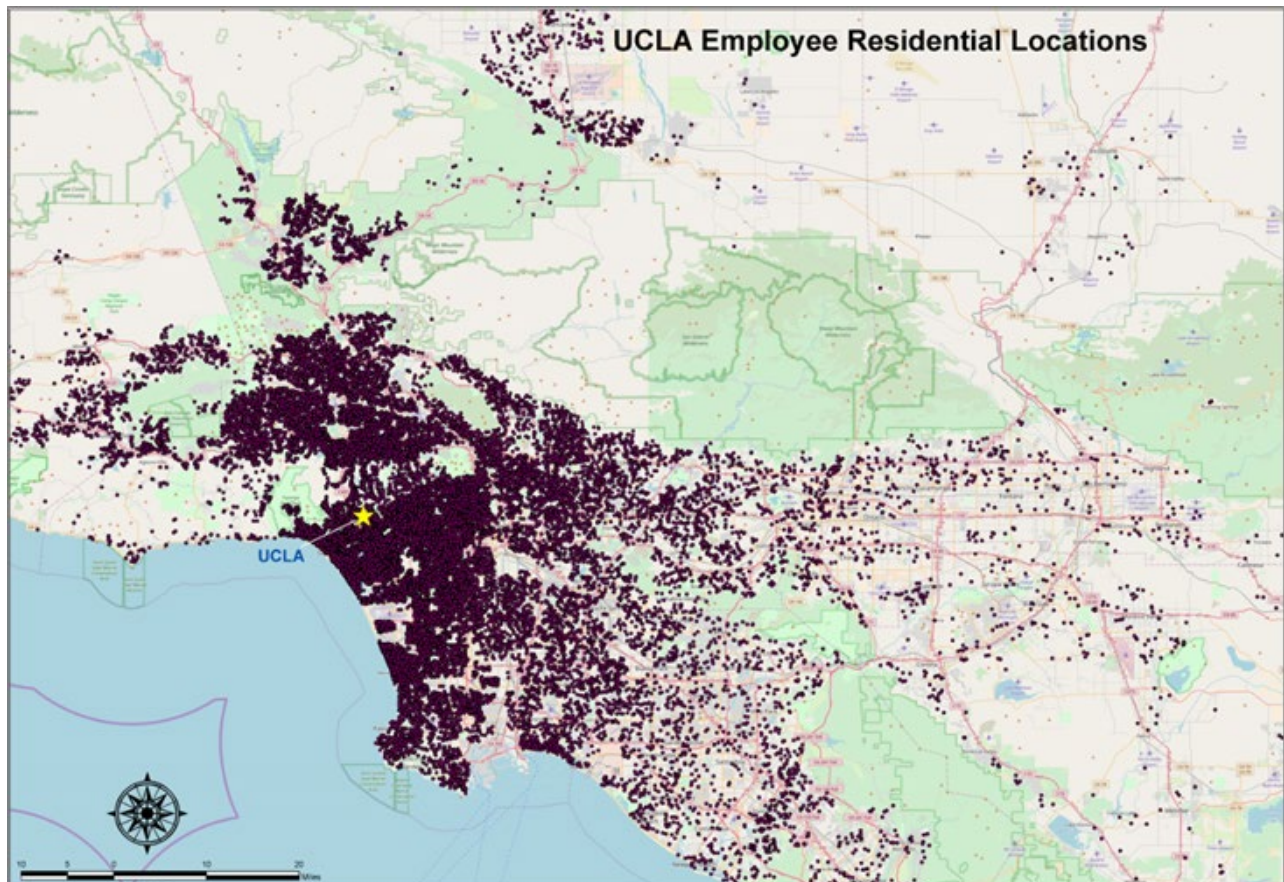
A handwritten signature in black ink, appearing to read "Michael J. Beck". The signature is fluid and cursive, with a large, sweeping initial "M".

Michael J. Beck
Administrative Vice Chancellor

Attachments

- Attachment 1: UCLA Employee Residential Locations
- Attachment 2: UCLA Bruins in the San Fernando Valley

Attachment 1 – UCLA Employee Residential Locations



Attachment 2 – UCLA Bruins in the San Fernando Valley

