

September 2023 RBM Public Comments – Item 42

From: [REDACTED]
Sent: Tuesday, September 26, 2023 2:17 PM
To: Board Clerk <BoardClerk@metro.net>
Subject: Authorizing Extension of MicroTransit Pilot Program

Attn: Board of Directors - Regular Board Meeting

Meeting Date: Thu. Sep. 28, 2023

Agenda Number: #42 - 2023-0464

As a proud devoted constituent of the city of Los Angeles, specifically in the city of Burbank...by way of my hometown of Pasadena...I am simply writing to request that the Board of Directors vote YES to authorize the extension of the Micro Transit Pilot Program. Otherwise known as Metro Micro.

I have been a very active passenger with this public transportation service for at least the past 20 months. And due to the fact that there are no public bus routes within at least 3/4 of a mile of the specific area of Burbank that I reside. This Micro Transit service has been extremely essential in helping to provide myself effective transportation within my community. I started taking the Metro Micro service over a year ago once my own car became unable to drive any longer, and I could no longer afford the necessary repairs. And since I'm also partially disabled, the ability to catch a ride with the ADA van within a short walk is very convenient for myself. Not to mention the affordable cost of the rides is also very much appreciated.

Although I do plan to have use of my own car again in the near future to be able to travel around my extensive Los Angeles community. Continuing to provide this very helpful and effective public transportation service would be greatly appreciated.

And I believe it will continue to be a valuable transportation resource for many others

within our local community, assuming the rates to ride do not go up too much in the future.

And special shout out to all the tremendous drivers within the Burbank-North Hollywood Zone.

Steven, Claudia, Kevin B., Giovanni, Robert, Rogean, Sasha, Oscar, Naomi and many others, keep up the great work and service you're providing to your community.

Best Regards,

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For Metro Board of Directors Meeting, Sep 27, 2023

General Public Comment

By [REDACTED] Lawndale Homeowner, Retired Aerospace Engineer

(See Honorable Board Clerk for contact information)

Subject: C Line (Green Line) Extension Cost Effectiveness and Ridership

Purpose: *If trains are to be built, I strive to determine the best train option.*

New Acronym: **GLT** for Green Line Team

Key References

C Line (Green Line) Extension Draft Environmental Impact Report (DEIR)

DEIR, Non-CEQA Reports, CLGET Ridership Summary, Table 3-1, C-Line/K-Line Configuration C-2 (selected by the Metro Board recently)

“Update to C Line Extension to Torrance” memo from CEO and Chief Planning Officer to Metro Board of Directors, dated August 14, 2023 (Aug 14 letter)

DEIR, Section 2.4-3 Proposed Project - Construction Durations

DEIR, Table 2.4-1 Proposed Project - Construction Schedule

DEIR, Table 2.4-3 Hawthorne Option - Construction Schedule

DEIR Appendix 2-B Construction Methods Memo

DEIR Section 3.5-2.2.1 through 3.4-2.2.3 (pages 3.4-16 through 3.4-19), Construction Tables 3.5-7 through 3.5-9 for Proposed Project (PP or ROW), Trench Option, and Hawthorne Blvd Option.

Green Line Extension Cost Effectiveness

In the C Line (Green Line) Extension Draft Environmental Impact Report (CLGET DEIR), Section ES.2-2, list of Project Objectives, the only reference to cost is “to provide a cost effective project.”

Metro Green Line Team (GLT) has previously defined cost effectiveness as cost per rider (cost/rider).

This presentation compares the relative cost effectiveness of two options, Hybrid Row and Hawthorne Blvd option. In a Comparison of Alternatives (DEIR Table ES-3, page ES-48), the “Proposed Project” a.k.a. ROW path, is unacceptable due to significant and unavoidable noise impact. The ROW path would also cause emergency responder delays at street crossings (ref. Aug 14 letter, pages 8-9). Hybrid ROW (previously called 170th/182nd grade separation option) and Hawthorne Blvd options do not degrade environment or safety that way.

Note that lowest cost option is not a project objective.

Summary: The Hawthorne Blvd option is more cost effective than Hybrid ROW option (by about 16%); for this and many other reasons, the Hawthorne Blvd option should be selected as the Green Line Extension Locally Preferred Alternative (LPA).

Ridership

The metric which Metro uses in their ridership reporting is “boardings,” sometimes called “project trips.” In this case, that includes all riders who will use the two new stations in Redondo Beach and Torrance. In an attachment to the DEIR, Non-CEQA Reports, CLGET Ridership Summary, Table 3-1... C-Line/K-Line Configuration C-2 (selected by the Metro Board recently) Haw Blvd Project Trips/Boardings are forecast to be 35% higher than for ROW (15,648/11,579). To emphasize the obvious, more ridership means less traffic, less air pollution, and less green house gases.

Project Option Cost Comparison

Metro Green Line Team would not provide details supporting their cost estimates despite my repeated requests.

Other sources were examined to compare option costs

- Green Line DEIR physical construction tables*
- Updated Green Line train program schedules*
- Metro Green Line Team 2023 cost & 2024 budget*

Physical Construction Cost

Physical construction cost includes cost for BNSF freight rail work, utility work, excavation, build of new light rails and stations

Tables of physical construction schedules from inside the DEIR Section 2.4-3 and Appendix 2-B show labor required. I loaded the data into a spreadsheet and found the Haw Blvd option to require 14% more construction labor than ROW path.

In the Aug 14 memo, the Green Line staff provided a cost estimate of Hybrid ROW (\$2.23B) in their Aug 14 letter to the Board of Directors, an increase of 14% over ROW path. I assumed the 14% increase to apply for all aspects of the option, including construction labor, so that means the construction labor for Hybrid ROW and Haw Blvd are the same. I also assumed that the equipment required for both tasks is the same since the labor is similar.

Pause. I am not trying to determine actual cost in dollars. That would require burdened labor rates and more which I am assuming are insignificant differences between the options. I'm just trying to show the relative difference in cost items, like labor, to compare the relative cost.

Material cost is not so easy, clear as mud. The construction tables show material movement, that Haw Blvd option requires 1.5% more than plain ROW. If Hybrid ROW requires 14% more for everything, material movement would be 12% more than Haw Blvd; Hybrid ROW requires digging under two street crossings, so they probably remove more dirt than replace. Those trenches will

need concrete support walls and at-grade covers. Hybrid ROW would need more robust (I assume) sound/safety walls all along the neighborhoods than for Haw Blvd, where the noise level is higher than in the neighborhoods. It seems like the elevated Haw Blvd structures would need more concrete for the elevated structure, but Hybrid ROW has to move/reset the BNSF tracks and multiple petrochemical pipelines. I assume special materials are required for freight and light rail substructure, and this offsets the extra concrete for Haw Blvd. The Hybrid ROW physical construction schedule estimate, new in the Aug 14 memo, is 15 months longer than Haw Blvd. Due to offsetting but different issues, I assume material cost is similar enough between the two options to assume they are the same.

With those numerous assumptions, I conclude that the physical construction cost for Hybrid ROW and Haw Blvd option are the same.

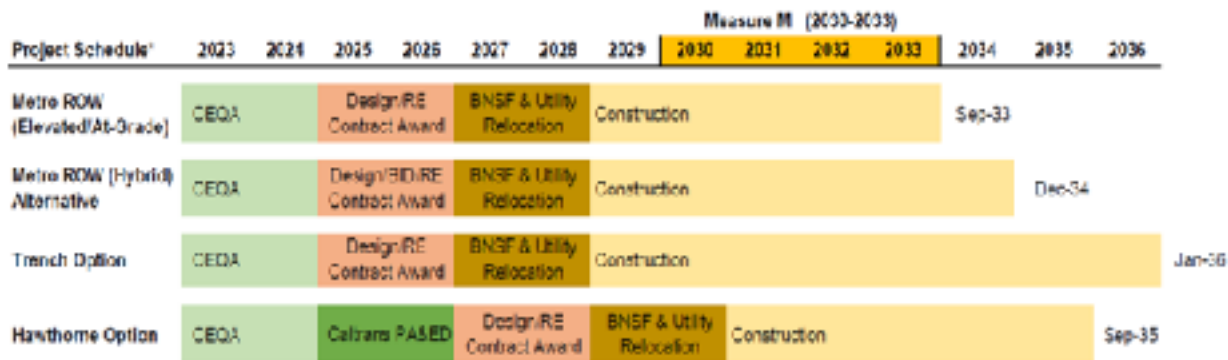
AND I said for months, often over the phone during Metro Committee meetings, that the ROW was defective, Metro's fix was the 170th/182nd Grade-separated option, and that extra cost to fix (14%) would make the construction cost about the same as for Haw Blvd. My rationale for 14% higher than ROW was based on the construction table for Trench option, which is about 66% higher than ROW. I estimated that the 170th/182nd Grade-separated option would have to trench about 1/4 as much as Trench option, 1/4 of 66% is 16.5% versus the Hybrid ROW increase of 14%. This supports my rationale for scaling most of Hybrid ROW by 14%.

Aside. If you have read this far, thank you. It's taken me months to get this far - no help from the GLT.

Total Project Cost

To assess total project cost, let's look at the GLT's project schedule of the train options for cost elements and build on the Hybrid ROW cost for an estimate of Haw Blvd cost.

(see schedule graph below, from Aug 14 letter to Metro Board)



Source: Metro, STV, and Jacobs

All four train options contain cost elements of CEQA, Design/ Bid, BNSF & Utilities, Construction.

ROW and Trench are scored environmentally defective in the DEIR, relative to Hybrid ROW and Haw Blvd, so are not evaluated.

The CEQA is the same cost for all options, & final EIR will be finished next year.

Physical Construction (BNSF, utilities, and construction) are the same for Hybrid and Haw Blvd, consistent with the DEIR construction tables, as explained above. Note that the Hybrid ROW construction schedule is 15 months longer than for Haw Blvd.

I assume the Design & bid work are the same (there is margin in the budget if not, which I discuss later).

Caltrans Project Approval & Env Document (PA&ED) is an additional cost for Haw Blvd. I used the Green Line CEQA team labor burn rate for the past two years (\$41M/year) and doubled for a similar Caltrans team, that is 164M total, which seems generous since the EIR will be finished before the Caltrans work. The Aug 14 letter made some unbelievable statements about the Caltrans work which I will rebut below (after Conclusions).

Inflation due to Haw Blvd extended schedule of 21 months at 3.5%/yr (Metro rate) is 144M.

Property Acquisition The Aug 14 memo says, “Several commercial properties needed to construct and operate Project located adjacent to I-405 and [the west side] of Haw Blvd [between 162nd Street north to the southbound Haw Blvd off ramp from the I-405].” How much should I book for that? How about \$11M? I think that’s too much, but it’s less than 1/2 a percent of the 2.23B Hybrid ROW, so it’s negligible.

Total add-ons to Hybrid ROW to get Haw Blvd option cost estimate are

Caltrans: 164M

Inflation: 144M

Prop Acquisition: 11M

Total Add-ons: 319M

Hybrid ROW: 2230M

Haw Blvd est: 2549M

My Haw Blvd option cost estimate of 2.55B is 14% higher than for Hybrid ROW

Hawthorne Blvd Total Project Cost Estimate Perspective

My estimate, with my sources and assumptions, are explained in detail, all derived from GLT processes, is \$410M less than the GLT estimate of \$2.96B, without any of their details explained (and, no, add-ons for risk and inflation common to all cost estimates are not distinguishing details).

We have no idea where the GLT thought they needed another \$410M above my add-ons. But just for fun, let’s put that number into perspective. An open position for Caltrans Senior Transportation Engineer at top salary is about \$163K/year (I assume that is industry standard). I added 50% for benefits (still trying to get a number from Caltrans) and 100% for overhead. That’s \$408K/year. So what I will call the Green Line Team’s overestimate for Haw Blvd of \$410M is 1000 years of Senior

*Transportation Engineering-level labor, a millennium of labor. Where in the world do they think they need a millennium of labor? Remember my assumption that the Design/Bid schedule cost element was about the same for Hybrid ROW and Haw Blvd? If you spread the millennium of labor over four years of Design/Bid and Caltrans work (beyond my generous allocation of 200 heads/year), that is 250 heads/year for four years. Really? **And this is where I claim that the Green Line Team's cost estimates for the Hawthorne Blvd option fail my test of reasonableness: their estimate is much too high relative to their estimate for the Hybrid ROW.***

Conclusions

For 14% more cost for Haw Blvd option over Hybrid ROW, ridership is 35% higher.

Haw Blvd option cost/rider is less than, better than for Hybrid ROW (by about 16%).

Haw Blvd option is more cost effective than Hybrid ROW and satisfies the Green Line cost effectiveness project objective better. For this and many other reasons, the Hawthorne Blvd option should be selected as the Green Line Extension Locally Preferred Alternative (LPA).

Bonus Comments for the Committed

About Metro-Caltrans work

The Aug 14 letter made some unbelievable statements about the Caltrans work required for the Haw Blvd Path which I will rebut now. On page 10, discussing Haw Blvd option, "Caltrans has not yet approved an encroachment permit and would require Metro to complete federal environmental documentation per the National Environmental Policy Act (NEPA) before Caltrans would consider approval of an encroachment permit."

This is highly disingenuous. First of all, of course Metro as not acquired the Caltrans encroachment permit. They have not performed the work required or paid Caltrans to review an application, if even filed yet.

Secondly, when Metro asked Caltrans to comment on the Green Line Extension program, Caltrans responded with two letters from Caltrans CEQA Branch Chief Miya Edmonson, one before the DEIR to Dolores Royal Saltaralli dated Feb 25, 2021, and one after the DEIR was published, to Georgia Sheridan dated March 24, 2023. Neither letter mentioned NEPA. It may be required, but neither letter said Caltrans "... would require Metro to complete federal environmental documentation per the National Environmental Policy Act (NEPA) before Caltrans would consider approval of an encroachment permit."

The Aug 14 memo continues, "This would add approximately two additional years of planning work." No big deal. It's in the schedule, I booked 400 years of senior transportation engineering-level work for that, probably over booked.

The Aug 14 memo continues, "The lack of approval from Caltrans on the Hawthorne option poses a significant risk to the Project implementation."

Nice try. To learn more about encroachment permits, especially around a freeway, I communicated with a coordinator of the I-5 North County Enhancements Project. They acquired numerous Caltrans encroachment permits, and no problems were noted.

I reported all this to the Metro Construction Committee meeting on September 21, that the Aug 14 memo made misleading statements about Caltrans requiring NEPA review. Secondly, stating the obvious, Metro and Caltrans work with each other all the time. CEO Wiggins and Caltrans District 7 Director Roberts attend every Metro Committee meeting (although Director Roberts had a sub that day). I said to the Committee that, if I could ask questions of the Green Line Team presenting in the next meeting to occur in a few minutes (Executive Management Committee), I would ask them to cite examples

where Metro and Caltrans could not agree on a project to the extent that the project was stopped. The risk sounds overstated.

And since the ROW path crosses State Route 107, a Caltrans ROW, I assume that a Caltrans encroachment permit would be required for the Green Line ROW.

Parking

The Aug 14 memo says, page 11, for the Haw Blvd option that about 20 parking spaces would be lost [in the median of Haw Blvd]. This is also mentioned in the DEIR Executive Summary Section ES.2-3.3. OK, Green Line Team, if this is so noteworthy that it belongs in the Executive summary, page 29 of a 1008-page DEIR, and the Aug 14 update summary memo, where is your mitigation plan? This is just another example of the many cheap shots that the GLT has taken against the Haw Blvd option (or if positive for the Haw Blvd option, like ridership, the data is suppressed). In neither reference above do they mention the capacity of parking in the area, which in the median and along Hawthorne Blvd is 310 spaces. So 20 spaces lost is about 6% of total available public parking. To discover this, (I live down the street so I have counted them) you have to go to DEIR Non-CEQA Documents, Transportation Detail Report, Section 3, to discover total available public parking. No mitigation plan. No assessment of ample parking on private commercial property available to customers either. And no assessment of utilization, which during normal business hours on weekdays is less than half for both public and private capacity. Nevertheless, during walks with GLT staff along Haw Blvd (spring 2022), before we knew the number of spaces which would be lost (and I give credit to the design team for keeping the number low), I made suggestions about how more parking space could be created to offset any loss. For example, there is a half lot on the west side of Haw Blvd south of 169th Street which has been vacant for over 30 years. So we can remain calm. This is not Parking Armageddon.

Cost of the BNSF ROW

By the way, a frequent argument for the ROW option is that the ROW has already been purchased. But nobody at Metro seems to know how much it cost. Not an Executive Officer of Transit Asset Management, her contacts, nor Metro records. I suspect that is a negligible amount compared to the total project, which would make that argument in favor of ROW path meaningless.

Questions?

As I noted earlier, the Honorable Board Clerk has my contact information, and Metro Board of Directors and their staff are welcome to contact me about this report.