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**SHERMAN OAKS HOMEOWNERS ASSOCIATION**

*Founded in 1964*

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July 11, 2025

Metro CEO Stephanie Wiggins  
Los Angeles County Metropolitan Transportation Authority  
Sepulveda Transit Corridor Project

**Subject: SOHA Now Finds Ten Fatal Flaws in Sepulveda Transit Corridor Project Draft EIR Package  
Metro Must Postpone Locally Preferred Alternative Decision Until All Flaws Are Fixed**

Dear Ms Wiggins,

The Sherman Oaks Homeowners Association strongly supports effective public transit but cannot yet support any of the Sepulveda Transit Corridor Project (STCP) Alternatives due to missing or erroneous information. We have gone through all 73 documents and 21,000+ pages of the STCP Draft Environmental Impact Report (DEIR) package. Our June 25<sup>th</sup> letter to Metro identified eight Fatal Flaws in the package and noted there may be more. We found two new flaws, and Fatal Flaw 2 may be the most egregious yet. We request Metro respond to us within 14 calendar days explaining the capital cost discrepancies noted in Fatal Flaw 2. The ten total Fatal Flaws prevent the public from making informed DEIR comments. Any decision the Metro Board makes based on these flaws could be erroneous. Metro must postpone the DEIR evaluation cycle and correct all ten flaws before its Board selects the Locally Preferred Alternative (LPA). This requires additional time and funding but is necessary for a fair outcome.

Ten Fatal Flaws In STCP DEIR Package	
1 Insufficient Funding for Any Alternative	6 Minimal & No Station Parking (new)
2 Surprising High Tariffs on Monorails (new)	7 Zero Public-Private Partnership Detail
3 Inept Alternative Selection Method	8 No Early Public Input into Alternatives
4 Unrealistic & Improbable Project Schedules	9 Inconsistent Heavy Rail Technologies
5 Suspicious & Insufficient Ridership Analysis	10 Trivial Public Presentation Content

Our recommendation to postpone the LPA decision and authorize additional studies and funding for further STCP analyses is exactly what the Metro Board decided to do nine months ago for Metro’s K-Line Northern Extension Project. Metro released this project’s DEIR in mid-2024 and its status on Metro’s website states:

*“On October 31, 2024, Metro’s Board of Directors approved additional funding for contract modifications to support further environmental analyses, engineering, and community engagement. These efforts aim to address public comments received during the [K-Line Northern Extension] DEIR public comment period that ended on September 20, 2024. Metro is currently evaluating potential refinements to the proposed alignments and will share its findings with the community and stakeholders to better respond to questions and concerns raised during community meetings.”*

A postponement gives Metro time to address DEIR comments received, work with communities, evaluate refined alignments, conduct further environmental, engineering, ridership, and cost analyses, and share findings with the public. Without the postponement, any LPA decision will be as flawed as the DEIR package is today.

## **METRO STCP DEIR PACKAGE HAS 10 FATAL FLAWS POSTPONE BOARD PREFERRED ALTERNATIVE DECISION UNTIL FLAWS FIXED**

We also recommend that Metro eliminate STCP Alternative 4 immediately from further consideration. Alt 4 is and has always been unfair to the Sherman Oaks and Van Nuys communities – and the Valley overall. Alt 4 uses elevated heavy rail trains operating above Sepulveda Blvd in ONLY the Valley – but not on the Westside. Alt 4 does not provide parity for the Valley – as specifically guaranteed in Measure M. It would become the only above-ground heavy rail trains that Metro has or is planning across all LA County. The Valley never deserved this!

SOHA has consolidated important project information in a single-page SOHA InfoSheet which appears on page 3. It provides a quick summary of the five Alternatives, and our members have found it informative.

SOHA's updated STCP DEIR Fatal Flaws Analysis begins on page 4. It provides a detailed rationale for postponing the STCP DEIR process and what actions are required to fix the Fatal Flaws.

Thank you.

Respectfully,



Bob Anderson




VP and Transportation Committee Chair

Sherman Oaks Homeowners Association

[BobHillsideOrdinance@gmail.com](mailto:BobHillsideOrdinance@gmail.com)

cc: Metro Sepulveda Transit Corridor Project File, Sharon Gookin (Metro Deputy CEO), Nicole Englund (Metro Chief of Staff), Elba Higueros (Metro Deputy Chief of Staff), Peter Carter (Metro STCP Project Manager), Supervisor Janice Hahn (Metro Board Chair), Fernando Dutra (Metro Board First Vice Chair), Jacquelyn Dupont Walker (Metro Board Second Vice Chair), LA Mayor Karen Bass (Metro Board), Supervisor Lindsey Horvath (Metro Board), Supervisor Kathryn Barger (Metro Board), Supervisor Holly Mitchell (Metro Board), Supervisor Hilda Solis (Metro Board), Councilmember Katy Yaroslavsky (Metro Board), Inglewood Mayor James Butts (Metro Board), Pomona Mayor Tim Sandoval (Metro Board), Glendale Councilmember Ara Najarian (Metro Board), Congressmember Brad Sherman (30<sup>th</sup> District), Assemblymember Nick Schultz (44<sup>th</sup> CA District), Councilmember Nithya Raman (CD4), Councilmember Imelda Padilla (CD6), Councilmember Bob Blumenfield (CD3), John Alford (Congressmember Sherman Deputy), Katie Abrams (Supervisor Horvath Field Representative), Justin Orenstein (Supervisor Horvath Transportation Director), Dave Perry (Supervisor Barger Transportation Director), Victor Reyes (Assemblymember Schultz Field Deputy), Andrea Conant (CD4 Chief of Staff), Ackley Padilla (CD6 Chief of Staff), Jarrett Thompson (CD5 Transportation Deputy), Lisa Hansen (CD3 Chief of Staff), Mehmet Berker (CD4 Transportation Deputy), Jeff Jacobberger (CD3 Transportation Deputy), John Bwarie (Lindsay Imber (President Sherman Oaks NC), Jeffrey Hartsough (Sherman Oaks NC), Jeff Kalban (Sherman Oaks NC), Jamie Meyer (President, Bel Air Association), Fred Rosen (Keep Bel-Air Beautiful), Noah Helpem (KBAB counsel), Travis Longcore (President Bel-Air Beverly-Crest NC), Leslie Elkan (Village at Sherman Oaks BID), Tammy Scher (Sherman Oaks Chamber of Commerce), Marian Dodge (Hillside Federation), Kevin Crummy (Douglas Emmett), David Tedesco (IMT Capital), Rachel Uranga (LA Times), Colleen Shalby (LA Times), Dave Zahniser (LA Times), Jill Cowan (NY Times), Jill Stewart (LA Daily News), Steve Scauzillo (LA Daily News), Jim Hampton (CityWatch), Jack Humphreville (CityWatch), Marci Marks (Encino-Sherman Oaks-Studio City News), Matt Shaw (Westside Current), Jamie Paige (Valley Current), Joe Taglieri (Valley Current)

**METRO STCP DEIR PACKAGE HAS 10 FATAL FLAWS  
 POSTPONE BOARD PREFERRED ALTERNATIVE DECISION UNTIL FLAWS FIXED  
 SOHA INFO SHEET – METRO SEPULVEDA TRANSIT CORRIDOR PROJECT**

Alternatives 1 & 3 [No Alt 2]	Alternatives 4 [WE OPPOSE] & 5	Alternative 6
Automated Driverless Monorail	Automated Driverless Heavy Rail	Driver-Operated Heavy Rail
		
<b>Who Is Designing the Alternatives?</b>		
LA SkyRail Express Monorail construction consortium	Bechtel Sepulveda Partners Heavy rail construction consortium	HTA Partners Metro environmental contractor
<b>What Are the Routes and Route Lengths?</b>		
All routes from Van Nuys MetroLink station at north to Metro Expo E Line (Pico Blvd) at south		
Alt 1 – 15.1 miles (no tunnel) Alt 3 – 16.1 miles (3.6 in tunnel)	Alt 4 – 13.9 miles (8.4 in tunnel) Alt 5 – 13.8 miles (13.1 in tunnel)	Alt 6 – 12.9 miles (all in tunnel)
Above center or edge of I-405 in Valley, Pass, and Westside Alt 3 underground to UCLA	Subway under Westside and Pass <b>Alt 4 above Sepulveda Blvd in Valley</b> Alt 5 under Sepulveda Blvd in Valley	Subway under Westside and Pass Subway under Van Nuys Blvd in Valley
<b>Where Are the Stations?</b>		
8 or 9 above-ground stations on east and west sides of 405 Alt 3 has 2 stations underground	Alt 4 has 4 above-ground Valley stations along Sepulveda Blvd Alt 5 has 7 underground stations	7 underground stations
Van Nuys MetroLink Sherman Way Oxnard Street (Orange G Line) Ventura Blvd Getty Center UCLA Gateway Plaza (Alt 3 only) Wilshire Blvd (Purple D Line) Santa Monica Blvd Exposition Blvd (Expo E Line)	Van Nuys MetroLink (above ground) Sherman Way Oxnard Street (Orange G Line) Ventura Blvd UCLA Gateway Plaza Wilshire Blvd (Purple D Line) Santa Monica Blvd Exposition Blvd (Expo E Line)	Van Nuys MetroLink Oxnard Street (Orange G Line) Ventura Blvd UCLA Gateway Plaza Wilshire Blvd (Purple D Line) Santa Monica Blvd Olympic Blvd (Expo E Line)
<b>What Are the Peak Passenger Capacities per Hour?</b>		
Train every 2.77 minutes 15,910 passengers with 8-car train	Train every 2.5 minutes 16,320 passengers with 4-car train	Train every 4.0 minutes 11,970 passengers with 6-car train
Metro ridership estimates “suspicious” due to insufficient analysis and low levels of parking		
<b>How Long To Travel Entire Route End-to-End?</b>		
28 (Alt 1) & 33 (Alt 3) minutes	20 minutes (Alts 4 & 5)	18 minutes
<b>Will Alternatives Be Noisy?</b>		
Alts 1 & 3 need some sound walls on east side of 405 in Valley	Alt 4 needs sound walls in Valley Low-noise subways elsewhere	Low-noise subway
<b>What Is Metro’s Construction Budget? (2025 dollars)</b>		
\$8 billion including Measure M sales tax receipts plus federal, state, county, and local funding		
<b>How Much Will Construction Cost? (2025 dollars)</b>		
\$17.8 (Alt 1) & \$24.0 (Alt 3) billion	\$23.1 (Alt 4) & \$27.9 (Alt 5) billion	\$28.2 billion
<b>At Least How Long Will Approvals &amp; Construction Take?</b>		
12 years (Alt 1) & 14 years (Alt 3)	14 years (Alts 4 & 5)	15 years (Alt 6)

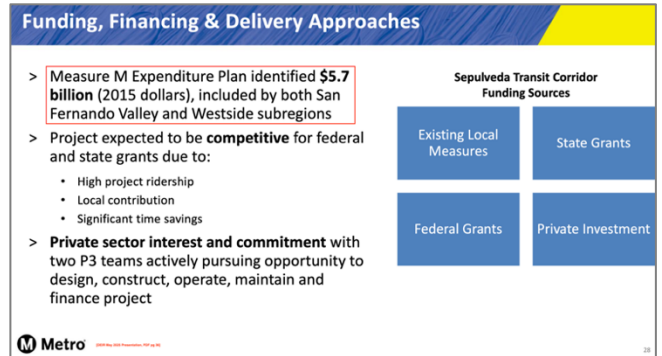
*Info based on publicly available 2018 to 2025 Metro documents, DEIR package, PDA contractor proposals, and other; may change due to ongoing design activities  
 July 2025 (Revision 9)*

# METRO STCP DEIR PACKAGE HAS 10 FATAL FLAWS POSTPONE BOARD PREFERRED ALTERNATIVE DECISION UNTIL FLAWS FIXED SOHA STCP DEIR FATAL FLAWS ANALYSIS

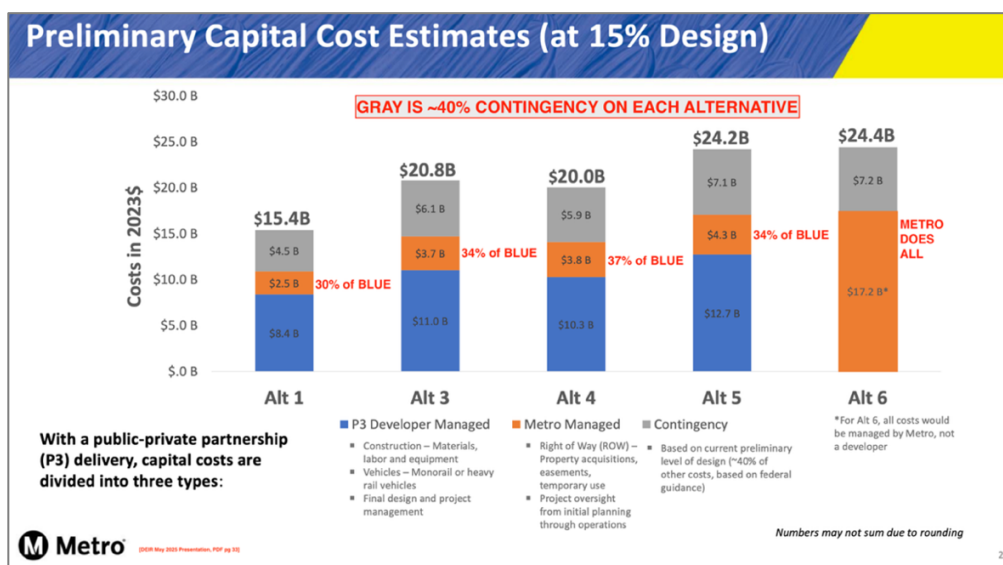
## Fatal Flaw 1 – Insufficient Funding For Any Alternative

There is less than \$3.8 billion in real funding available today for the STCP. Metro keeps telling the public that they will find more funding later – but never how much, how, or when. Without knowing realistic funding, the public cannot make informed comments on the STCP – and the Metro Board cannot make an informed and fair decision on which Alternative to build. The chart to the right was presented at Metro’s May 2025 pre-DEIR meeting and validates that there is only \$5.7 billion of 2015 dollars available in the Measure M Expenditure Plan. But more than half of that funding is not guaranteed or available today.

The only funding available today is that which Metro directly controls – sales tax revenues from Measure M. The Measure M Expenditure Plan shows that only 45% of the \$5.7 billion, or \$2.6 billion, comes from sales tax revenues. The remaining 55% was simply a 2015 Metro guess at how much funding they might obtain from local, state, federal, and other sources. Today, LA City is over budget. LA County is not much better. California has severe budget shortages. Federal funding is essentially unobtainable under the current administration – possibly for years to come. Metro’s only reliable STCP funding source is gross sales tax receipts. These receipts increased about 30% from 2018 to 2024, which implies a 48% increase from 2015 to 2025. So, Metro’s \$2.6 billion in 2015 dollars escalates to \$3.8 billion in 2025 dollars. That’s not much!



The chart below from Metro’s May 2025 pre-DEIR meeting provides capital cost estimates for the five STCP Alternatives, ranging from \$15 billion to \$24 billion in 2023 dollars. They are higher in 2025 dollars. The \$3.8 billion of actual available funding is short by \$10 to \$20 billion. Metro doesn’t consider how much funding is available for a project in parallel with preparing the DEIR, as highlighted in this short video (<https://youtu.be/hb9FxfFITHg>) from Metro’s January 2023 STCP Open House. The Metro representative states it was “... too early to speculate on cost ...” and is “... premature to talk about costs ...” This is nonsense unless a public-private partnership (PPP) might solve the funding dilemma – but Metro has provided the public zero detail on how a potential PPP would work – so how could the public know. We need factual funding information and how funding will impact cost and schedule for the five Alternatives. The Metro Board needs to know even more.



Metro chose to NOT INCLUDE the cost chart above in its DEIR package and NOT PRESENT IT at the recent June 23<sup>rd</sup> virtual DEIR public meeting. This is unfair to new attendees trying to understand the project.

## METRO STCP DEIR PACKAGE HAS 10 FATAL FLAWS POSTPONE BOARD PREFERRED ALTERNATIVE DECISION UNTIL FLAWS FIXED

The cost chart above also shows that Metro applied a ~40% cost contingency to each Alternative, which they say is consistent with the 15% design level for the Alternatives. Metro used Pre-Development Agreement (PDA) contracts for Alternatives 1, 3, 4, and 5. The PDAs were supposed to result in a higher percentage of design at DEIR, maybe 25%. A higher level of design would require a lower level of contingency than ~40%. Metro needs to explain what level of design each Alternative is at and how this impacts cost and schedule.

### Fatal Flaw 2 – Surprising High Tariffs on Monorails (new)

Metro presented the page 4 capital costs chart at its May 2025 public meetings. SOHA was surprised by the high costs of the monorail Alternatives as were many others. Residents from many communities, elected officials' staff, and even the press contacted us about the costs. At the virtual public meeting we attended, Metro never highlighted the surprising monorail costs and never explained why they were high. We analyzed several possibilities and recently concluded that Metro must have applied tariffs to only monorails and never bothered mentioning this to the public.

We first compared Metro's capital costs for the Alt 1 and Alt 3 monorails which have similar routes. Alt 1 has no tunnel. Alt 3 has a 3.6-mile tunnel under Bel Air, UCLA, and Westwood, and its route is one mile longer than Alt 1. Alt 3's capital cost estimate is \$20.8 billion – \$5.4 billion more than Alt 1 at \$15.4 billion. This makes sense because tunnel length is the key driver cost driver.

We next compared Metro's capital costs for the Alt 4 and Alt 5 driverless heavy rail which travel the same route. Alt 4 has an 8.4-mile tunnel. Alt 5 has a 13.1-mile tunnel which is 4.7 miles longer than Alt 4's tunnel. Alt 5's capital cost is \$24.2 billion – \$4.7 billion more than Alt 4 at \$20.0 billion. This again makes sense and importantly highlights that each mile of tunnel versus above-ground costs about \$1 billion extra.

We finally compared Metro's capital costs for the Alt 3 monorail and Alt 4 heavy rail. Alt 4 has an 8.4-mile tunnel – 4.8 miles longer than Alt 3's 3.6-mile tunnel. Since each mile of tunnel adds about \$1 billion, Alt 3 should cost about \$4.8 billion less than Alt 4 – or \$15.2 billion. It couldn't possibly cost more than Alt 4 – that would make no sense. Yet Metro's cost chart tells us that Alt 3 costs \$0.8 billion more than Alt 4 – or \$20.8 billion. How can this be? Very simply, it can't be. Something is driving up the monorail costs and Metro has not told us what that is.

SOHA wondered what might drive up only monorail costs. Our Transportation Committee Chair, Bob Anderson, remembered something from attending Keep Bel-Air Beautiful's April 18, 2025 deposition of Metro Chief Planning Officer Ray Sosa. Mr. Sosa's Planning Department is responsible for the Sepulveda Transit Corridor Project. During the deposition, Mr. Sosa twice mentioned "tariffs" in response to capital cost questions, as the following quotes show.

*Deposing attorney: "How many billions of dollars of public funds does Metro expect to spend on this project?"*

*Mr. Sosa: "So there is funding in Measure M that's in the billions, and there will be a need for more funding based on some of the climate in the industry. We have things affecting prices like **tariffs** and so forth and so on so it will be in the billions. I don't have a specific number to share." [official deposition transcript PDF page 57]*

*Deposing attorney: "Your best estimate as you sit here today of the estimated cost per mile in various alternatives."*

*Mr. Sosa: "It could be between one or two, depending on the **tariffs**, it could be more." [official transcript PDF page 69]*

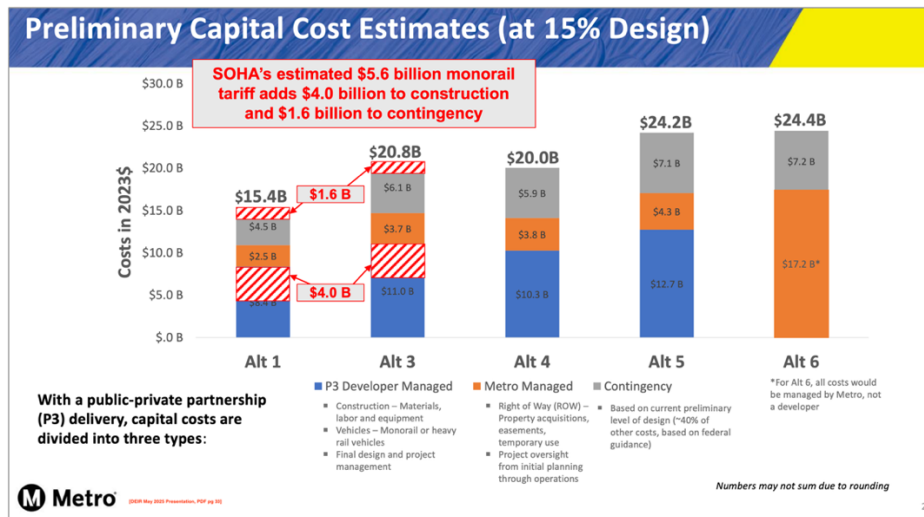
The official deposition transcript is available at <https://www.shermanoakshomeownersassociation.com/transit>. Scroll down a few stories and click the "Deposition Transcript of Metro Chief Planning Officer" button.

Keep Bel-Air Beautiful's deposing attorney never used the word tariff, yet Mr. Sosa used it twice – about a month before Metro released its STCP capital cost estimates. Mr. Sosa would only do this if tariffs were on Metro's mind. So, there is a good chance Metro used a tariff to increase monorail costs because the monorail consortium includes non-US-based companies. How much tariff? Our earlier Alt 3-to-Alt 4 comparison shows that the Alt 3 capital cost should be \$15.2 billion – \$4.8 billion less than Alt 4. A \$5.6 billion tariff would fill the gap and raise Alt 3's cost to Metro's \$20.8 billion value. So, we used this \$5.6 billion tariff as an illustrative example to show what a tariff could do to capital costs.

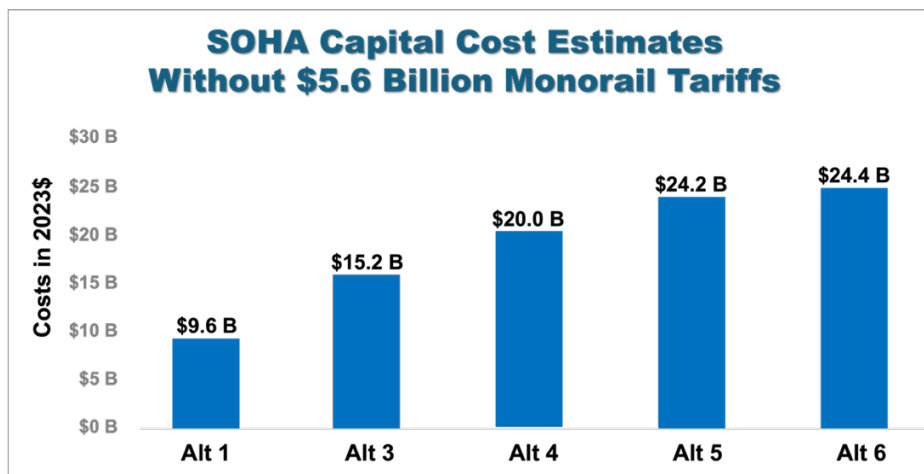
We know this is not perfect or exact – but it's something thoughtful compared to the zero information that Metro gave the public about this. We applied the \$5.6 billion tariff to both Alt 1 and Alt 3 and split it into \$4.0 billion for

# METRO STCP DEIR PACKAGE HAS 10 FATAL FLAWS POSTPONE BOARD PREFERRED ALTERNATIVE DECISION UNTIL FLAWS FIXED

construction with \$1.6 billion for the ~40% contingency on construction. As the chart below shows, the tariff is a significant portion of the two monorail Alternatives capital costs.



In reality, putting tariffs on the monorail doesn't make much sense. As once explained to us, the monorail PPP contractor would be a US-based entity and would construct the project using local union labor and competitively priced components, just like the heavy rail contractor. If tariffs made a component's cost non-competitive, they would procure it elsewhere. Because of this, tariffs would apply to only a very small portion of the project's capital cost. It would be almost impossible to increase monorail costs by more than \$1 billion due to tariffs – much less \$5 billion – even if tariffs were 145% – which they currently are not. In addition, the tariff situation is very fluid and changing weekly. No one can predict what tariffs might be in a month, let alone three or four years. We think Metro was very foolish if they added unpredictable tariffs to monorail costs. The public might look at our illustrative “no-tariff” chart below and come away with a very different opinion of monorail versus heavy rail.



The root problem is that Metro presented financially irresponsible capital cost estimates for the five Alternatives that defy reason or logic. Then they never explained why monorail costs were unrealistically increased from public expectations. SOHA has a strong argument for thinking Metro using tariffs. But, whatever the actual cause of the high monorail costs, Metro has an obligation to explain this to the public – and they failed this obligation. Metro self-created this Fatal Flaw 2 themselves because they expected the public to roll over and play dead – not question the cost estimates and their root issues. These cost estimates will greatly influence the Metro Board deciding which Alternative the public prefers and which alternative to build. Metro needs to carefully review all its capital cost estimates using common sense, determine if any are excessively high or low, correct them, and present revised costs to the public along with a detailed rationale for each estimate. The requires the LPA decision be postponed. Only then can the public and Metro Board understand and trust the costs.

# METRO STCP DEIR PACKAGE HAS 10 FATAL FLAWS POSTPONE BOARD PREFERRED ALTERNATIVE DECISION UNTIL FLAWS FIXED

## Fatal Flaw 3 – Inept Alternative Selection Method

Metro uses the “Ready...Fire...Aim” method to select which Alternative to build – not the more proven “Ready...Aim...Fire” one. By ignoring cost and schedule impacts on the project while designing the Alternatives and preparing the DEIR, Metro may have already damaged their chances of getting federal funding they so desperately need. They’ve also created a knowledge vacuum for their own Board – one that makes an intelligent Board decision on which Alternative to build extremely challenging. The DEIR’s purpose is understanding the environmental impacts of the project. Metro provided a DEIR package to the public and Board that is full of descriptive information with no rationales about why decisions were made. It’s been almost six years since Metro has provided any such information – and that was in the DTCP Final Feasibility Study Report in November 2019. The DEIR was never meant to provide the end-all technical, cost, and schedule details that the Board needs to decide on which Alternative to build.

That decision requires detailed knowledge of every technical and environmental aspect of the project, and in addition complete knowledge of project cost, schedule, and funding timelines. For example, even though these are not required by the California Environmental Quality Act (CEQA), the DEIR package should have included realistic potential funding scenarios and their impacts on both project cost and schedule. Instead, Metro puts off understanding cost and schedule implications – and that got them where they are today – with insufficient information to proceed to a Board decision.

The DEIR itself provides proof of this situation. The table below from DEIR Chapter 4 (PDF page 17) ranks projects using new January 2025 guidance from the Federal Transit Administration (FTA). Projects are ranked for future

Capital Investment Grants (CIG) funding based on specific criteria for Cost Effectiveness, Mobility Improvements, and Congestion Relief. FTA uses five rankings: Low, Medium-Low, Medium, Medium-High, and High. The table shows how each of the five Alternatives ranked. The FTA guidance also states: “To be considered for a CIG construction grant agreement, a project must achieve at least an overall ‘Medium’ rating.”

**Table 4-25. Preliminary FTA Capital Investment Grant Scores by Project Alternative**

	Alt 1	Alt 3	Alt 4	Alt 5	Alt 6
<b>Cost Effectiveness</b>					
Annualized cost per annual linked project trip	\$36.48	\$32.60	\$21.85	\$24.30	\$27.35
Rating	Low	Medium-Low	Medium-Low	Medium-Low	Medium-Low
<b>Mobility Improvements</b>					
Annual linked project trips with quintuple weight for trips by transit-dependent persons	59,632,779	78,074,962	117,123,892	117,864,174	102,162,752
Rating	High	High	High	High	High
<b>Congestion Relief</b>					
New systemwide linked transit trips	16,537	21,502	34,358	34,675	30,580
Rating	Medium-High	High	High	High	High
Source: HTA, 2024 <small>(DEIR Chap 4, PDF pg 17)</small>					

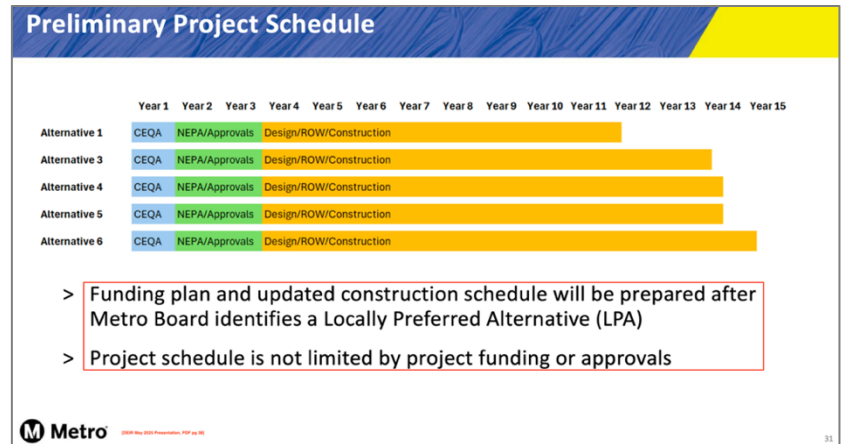
The table shows that none of the five Alternatives achieved higher than a Medium-Low score on cost effectiveness – dangerously low. Metro spent eight years and \$150+ million on the project so far yet only achieved “Low” and “Medium-Low” FTA cost effectiveness ratings, which will drag down the STCP overall FTA rating and make it more difficult to get federal funding.

Metro’s “Ready...Fire...Aim” method for selecting the Alternative to build is responsible for this debacle. Metro needs to provide the public and their Board realistic potential funding scenarios before the Board makes their decision on which Alternative to build. Metro should also try to improve the project’s FTA cost effectiveness ratings for all Alternatives.

# METRO STCP DEIR PACKAGE HAS 10 FATAL FLAWS POSTPONE BOARD PREFERRED ALTERNATIVE DECISION UNTIL FLAWS FIXED

## Fatal Flaw 4 – Unrealistic & Improbable Project Schedules

A glance at the preliminary project schedule at the right from Metro’s May 2025 pre-DEIR presentation tells you it is not realistic – and neither are the cost estimates for the five Alternatives. The giveaway is the statement “Project schedule is not limited by project funding or approvals”. Since we know there is almost no funding available for the project, the preliminary schedule cannot be realistic. And if the schedule isn’t realistic, neither are the cost estimates – because if we don’t know how long it takes to build the Alternatives, we also don’t know how much they cost.



During Keep Bel-Air Beautiful’s deposition of Metro Chief Planning Officer Ray Sosa, in response to questions about schedule, Mr. Sosa’s response is very relevant – because this schedule was intended to placate the public.

*“I mean, it’s never the intention of Metro to release project schedules to placate the community.”* [Official deposition transcript page 45, lines 11-13]

Metro also chose to NOT INCLUDE the preliminary project schedule chart above in its DEIR package and NOT PRESENT IT at the recent June 23<sup>rd</sup> virtual DEIR public meeting. We cannot understand why Metro would not want the public to understand how long it takes to build each Alternative – even though we feel the unrealistic schedules were meant to placate the public.

The preliminary project schedule chart also states that the “Funding plan and updated construction schedule will be prepared after the Metro Board identifies a Locally Preferred Alternative (LPA)”. This means Metro is going to select which Alternative to build before they know how much it will cost and how long its construction will take. This is illogical – especially since Metro has in its hands today detailed cost estimates and schedules for SkyRail’s Alternative 1 and 3 monorails and Bechtel’s Alternative 4 and 5 heavy rails. The Pre-Development Agreement (PDA) contracts required the cost estimates as Deliverable D3.4.2.a. We do not know if Metro has an equivalently detailed cost estimate for Alternative 6 designed by Metro’s environmental contractor, HTA Partners – but they should.

In addition, Metro has explained that they might decide to phase the project into multiple increments built over a longer schedule – but notes they won’t make such a decision until after the Board selects which Alternative to build. This is absurd and changes the project completely. The Board plans to decide which Alternative to build without knowing whether they may have to build it in phases because they don’t have enough funding for it. Phasing may get portions of the project finished early – which ones? – but will delay the overall project and significantly increase project cost. Metro keeps saying this is how the California Environmental Quality Act (CEQA) requires them to make their decision. We think this is just an excuse for Metro to make whatever decision they want without considering cost and schedule impacts.

Finally, the schedule chart should have shown two different schedules for each of Alternatives 1, 3, 4, and 5 – and Metro’s earlier capital cost chart should have shown two different costs. The first schedule and cost would be the Alternative being built under a public-private partnership (PPP) arrangement, as planned for these four Alternatives. The second schedule and cost would apply if Metro and its selected PPP contractor cannot not reach agreement on a PPP contract, which is possible. Should this occur, Metro must procure a contractor to build the Alternative that their Board has already selected. Further detail on this serious situation can be found under Fatal Flaw 7 about PPPs.

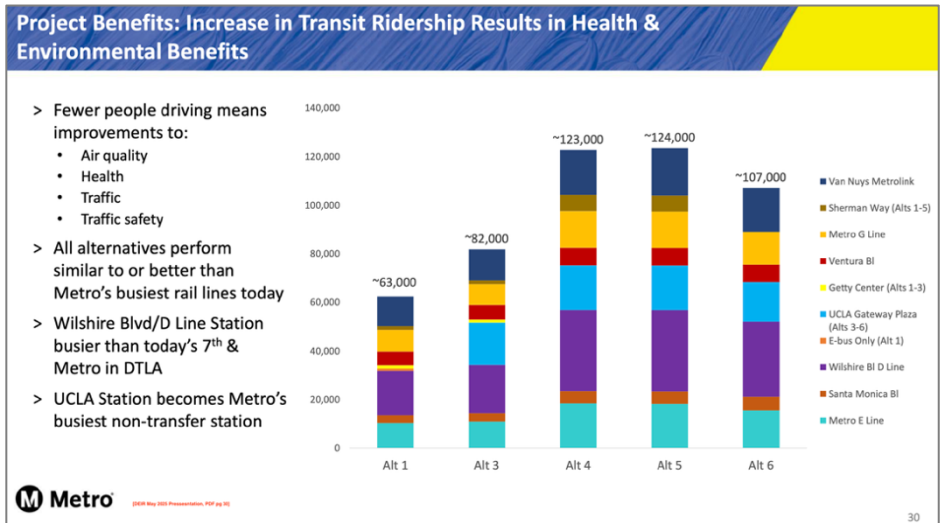
Fatal Flaw 4 can only be fixed if Metro develops and provides significantly more cost and schedule information to the public and Metro Board before deciding on which Alternative to build.

# METRO STCP DEIR PACKAGE HAS 10 FATAL FLAWS POSTPONE BOARD PREFERRED ALTERNATIVE DECISION UNTIL FLAWS FIXED

## Fatal Flaw 5 – Suspicious & Insufficient Ridership Analysis

We're suspicious of Metro's ridership analysis results that they showed below at the May 2025 pre-DEIR presentation. We also know that Metro shortchanged the public with minimal information about the ridership analysis assumptions. This is serious because the number of people that ride each Alternative figures critically in public opinion of the Alternatives, Alternative cost effectiveness, and how the Board decides which Alternative to build.

Ridership analysis is part art, part statistics, and part mathematical modeling. We know because Bob Anderson, our Transportation Committee Chair, conducted similar sophisticated modeling for years. One look at Metro's ridership results and he was very suspicious – because the ridership results are specific with exacting numbers of riders. These types of models are statistically based, and good modelers understand that there is no exact answer. If a modeler thinks an answer is perfect and exact, they're new at modeling. Good modelers account for statistical sensitivities, provide results in ranges, and explain why results are sensitive to specific parameters and assumptions. They also explain significant ridership differences, such as between monorail and heavy rail. Metro provided none of this in its DEIR Non-CEQA Transportation Assessment Report.



Ridership also figures critically in each Alternative's cost effectiveness. Even though the chart above notes that "all alternatives perform similar to or better than Metro's busiest rail line today", none of the Alternatives received an FTA Cost Effectiveness rating above "Medium-Low" (see Fatal Flaw 3). These poor ratings indicate that ridership is on the low side of where it should be for such a high-cost project. Metro should have taken steps to learn how to improve ridership and improve their FTA cost effectiveness rating. Metro can fix this Fatal Flaw by broadening their ridership analysis to include sensitivity studies of critical parameters and assumptions, providing more believable ridership results that take sensitivities into account, and better explaining the results to the public.

Ridership also figures critically in each Alternative's cost effectiveness. Even though the chart above notes that "all alternatives perform similar to or better than Metro's busiest rail line today", none of the Alternatives received an FTA Cost Effectiveness rating above "Medium-Low" (see Fatal Flaw 3). These poor ratings indicate that ridership is on the low side of where it should be for such a high-cost project. Metro should have taken steps to learn how to improve ridership and improve their FTA cost effectiveness rating. Metro can fix this Fatal Flaw by broadening their ridership analysis to include sensitivity studies of critical parameters and assumptions, providing more believable ridership results that take sensitivities into account, and better explaining the results to the public.

## Fatal Flaw 6 – Minimal & No Station Parking (new)

We also wondered if ridership was so low due to lack of parking and inconsistency of available parking between Alternatives. The table below from the DEIR Travel Demand Forecasting Report (PDF page 47) shows the number of parking spaces that Metro used in its ridership analysis. We have two concerns. First, different Alternatives have different numbers of parking spaces. Metro should have mandated specific numbers of spaces at each station location. This would have ensured consistency in ridership results. As it is, many stations have no parking, a few have some existing parking, and very few added a small amount of new parking.

**Table 4-6. Existing and New Parking Spaces by Station for Alternatives 1-6**

Station	Alt 1	Alt 3	Alt 4	Alt 5	Alt 6
Van Nuys Metrolink Station	0	0	0	0	0
Sherman Way	0	0	New: 122	New: 122	0
Metro G Linea	Existing: 1205	Existing: 1205	Existing: 1205	Existing: 1205	Existing: 307
Ventura Boulevard <sup>a</sup>	0	0	New: 92	New: 92	New: 185
Getty Center	0	0	--	--	--
UCLA Gateway Plaza	--	0	0	0	0
Metro E Line Expo/Sepulveda <sup>b</sup>	Existing: 260	Existing: 260	New: 126 Existing: 260	New: 126 Existing: 260	--
Metro E Line Expo/Bundy <sup>b</sup>	--	--	--	--	New: 80 Existing: 217

Source: HTA, 2024 (DEIR Travel Demand Forecasting Report, PDF page 47)

Most stations have minimal numbers of parking spaces. No station has more than 300 spaces except the G (Orange) Line with 1,200 existing spaces shared between the G Line and the STCP. Sherman Way has either zero or 122 spaces, and this is a travesty because it is near the LAX FlyAway terminal where people are used to going for LAX. It should have had hundreds or even thousands of spaces.

# METRO STCP DEIR PACKAGE HAS 10 FATAL FLAWS POSTPONE BOARD PREFERRED ALTERNATIVE DECISION UNTIL FLAWS FIXED

Metro tends to study parking separately from the project, and usually after their Board has selected the Alternative to build. This is absurd. Parking is a strong driver of ridership and parking studies should be an integral part of the DEIR package – especially since parking structures are integral to stations and have their own environmental impacts. But again, that’s not what Metro has done with this STCP DEIR package. And ridership has suffered because of this – and so has the cost effectiveness of the entire project.

Metro also didn’t study how increased parking spaces – whether they are built or not – might impact overall ridership. Metro didn’t determine if each Alternative’s ridership and project cost effectiveness would improve with increased parking. Metro’s ridership model was in place and operative and could have been used to answer these and many other critical questions. It should have been easy to study the ridership impacts of significant blocks of additional parking at specific stations. Metro might also have learned if any Alternative was limited by its train’s maximum passenger capacity – an important consideration for future operations and expansion, especially of Alt 6.

We don’t know the answers to these questions but would think Metro Board members and the public want to know the answers before they decide which Alternative to build. Metro still has the model and should use an LPA selection postponement to generate the needed answers and better plan for the future.

## Fatal Flaw 7 – Zero Public-Private Partnership Detail

Metro has given the public zero detail about the public-private partnerships (PPPs) they might use on Alternatives 1, 3, 4, and 5 – and can’t use on Alternative 6. The chart below from Metro’s May 2025 public meetings is a great example of zero detail – just buzz words. A PPP would be a complex contractual-financial arrangement between

Metro and their selected PPP contractor – either SkyRail or Bechtel. PPP details would include financial, funding, cost, schedule, approval time, risk sharing, and other commitments. Yet, Metro has never told the public anything about how an STCP PPP might work or how it could impact project funding, cost, and schedule. For example, would a PPP negate the need for federal funding toward the project? Without such information, the public cannot understand PPP impacts and submit reasonable questions and comments about project costs and funding. Neither can the Metro Board who is supposed to decide which Alternative to build.

**Cost & Risk Reduction Strategies: P3**

**Metro is assessing Public-Private Partnership (P3) delivery**

P3s have been used around the world to:

- Leverage specialized knowledge
- Allocate risk
- Tap into innovative solutions
- Improve service delivery
- Access private financing

> **P3 Innovations for Sepulveda Transit Corridor**

- Integration of construction contractor early in process, when critical planning, design and engineering decisions can have the greatest possible impact
- New construction, rail and infrastructure technologies
- Station design and construction efficiencies
- Design refinements to reduce right-of-way requirements

> Partnership with private sector across multiple phases of project delivery

**Metro** 2025 May 2025 Presentation: PPPs.pptx 40

As part of their Pre-Development Agreement (PDA) contracts with LA SkyRail Express and Bechtel Sepulveda Transit Corridor Partners, Metro can commit or not commit to a PPP arrangement to design, construct, operate, maintain and finance either Alternative 1 or 3 with SkyRail or Alternative 4 or 5 with Bechtel. Both contractors have already submitted PPP financing plans to Metro as PDA Contract Deliverable D3.7.a. So, Metro has significant PPP information but has chosen not to share any of it with the public.

Alternative 6 cannot have a PPP because Metro’s environmental contractor, HTA Partners designed it under a non-PDA contract. Metro has not explained how this might impact Alt 6 funding, cost, and schedule. They need to.

## METRO STCP DEIR PACKAGE HAS 10 FATAL FLAWS POSTPONE BOARD PREFERRED ALTERNATIVE DECISION UNTIL FLAWS FIXED


The chart at the right from a February 2021 Metro Board presentation shows PPP basics. If Metro selects one of Alternatives 1, 3, 4, or 5, they will exercise their in-place PDA Phase 4 option with SkyRail or Bechtel for about \$30 million. The PDA contracts ensure that Metro “owns” the design of the selected Alternative, so they can build the selected Alternative without a PPP if they so choose. The single selected contractor would then take about a year to refine engineering for the Final EIR, conduct performance analyses, finalize PPP terms and conditions, establish risk allocation, and finalize pricing and submit a PPP proposal to Metro. Once Metro and the selected PPP contractor negotiate and finalize the PPP contract, the PPP can proceed.

But note item 6 on the chart. If Metro and the selected contractor cannot finalize a PPP contract, Metro may procure delivery of the already selected Alternative “through a different approach”. One likely approach is Metro beginning another lengthy procurement to select a contractor to construct the Alternative. If this happened, the project would switch from a PPP to the usual contracting arrangement, with probable increases to project cost, the need for more federal and other funding, and a longer project schedule. This is outcome is certainly possible, but Metro has never mentioned it at a public meeting, and few probably know anything about it. Metro must explain how they would accommodate this possibility in their LPA decision process to the public and its Board, so everyone understand the implications and challenges of using a PPP.

**How does a PDA work?**

Early private sector participation in project definition/design as a partnership with Metro

1. PDA Contractor provides technical work to support project development
2. Parallel to environmental review and approval process
3. Proposed concept design to be refined based on technical study and public feedback through environmental/PDA Process, with multiple “off-ramps”
4. Upon feasibility, Metro specifies final delivery approach, performance requirements
5. The selected PDA Contractor may submit a proposal a proposal for implementation if requested by Metro
6. If offer is not acceptable, Metro may procure delivery through a different approach

 Metro PDA Presentation Feb 2021, PDP page 6

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### Fatal Flaw 8 – No Early Public Input Into Alternatives

Metro has always seemed to consider the public as more of a nuisance than a partner. A partner would ask the public for their opinions and concerns early – before beginning to design a project – then use the opinions as they developed initial project concepts. A partner would establish early relationships with communities and work with them as the project evolved. Not Metro! In 2017, they started the STCP and held their first public meeting in June 2018, where they unveiled six concepts with 25 variations. No one in the public had ever seen these concepts before and some were very surprising. Metro asked the public for comments and questions but never responded to them. It was the same one-sided communication that continues today.

Two examples illustrate how Metro ignored public inputs. Today’s Alternative 4 was unveiled to the public in June 2018, much to the surprise and consternation of the Sherman Oaks and Van Nuys communities. Alternative 4 has elevated heavy rail trains operating about 20 feet above Sepulveda Blvd for five miles in only the Valley – and would be the only current or planned Metro rail transit project countywide with such elevated heavy rail. No one in Sherman Oaks or Van Nuys was asked if elevated trains concerned them – the concept simply appeared in 2018. Local residents and organizations submitted multiple complaints and concerns over the next seven years. Metro ignored them all and continued to design Alternative 4.

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As shown in the table to the right from DEIR Chapter 3.12 (PDF page 26), Alternative 4 requires the most eminent domain and removes the most single- and multi-family residential properties of any Alternative – 212 residences by eminent domain. Alternative 4 also has the most – seven of them – “Significant and Unavoidable” environmental impacts of all five STCP Alternatives, per the DEIR Executive Summary table at the right (PDF page 42). Alternative 4 also has the only significant and unavoidable “Environmental Aesthetics” impact. People in the Valley universally hate Alt 4 and still wonder why Metro ever considered it acceptable in the first place. The answer is easy – Metro never asked us before they developed their initial concepts.

From the DEIR, we also now know that Alt 4 requires several sound walls along the track structure to mitigate the sound levels of passing trains to what are claimed to be acceptable levels. Unfortunately, the Federal Transit Administration and Metro use the same analysis guidelines for transit noise that the Federal Aviation Administration uses for airplane noise. The short-burst sound of a passing train or airplane is averaged across the day. Ask any Sherman Oaks or Van Nuys resident how they feel about noisy aircraft taking off from Van Nuys Airport and you’ll realize just how inadequate this noise averaging technique is.

Bel Air is a second significant example of Metro not talking to communities early. Bel Air only learned after the fact that four of Metro’s five Alternatives have tunnels under their community. Metro never asked them or informed them. Ignoring the Bel Air community has already resulted in litigation against Metro for withholding documentation and Keep Bel-Air Beautiful has already begun to prepare litigation to stop the project.

If Metro would only learn to treat the public as partners, not enemies, everyone might communicate and work together. For example, route realignments might be possible if Metro would sit down and work with concerned communities. This is a Fatal Flaw that impacts not just the STCP but all Metro projects.

## Fatal Flaw 9 – Inconsistent Heavy Rail Technologies

Today, few in the Valley or anywhere know that Alternatives 5 and 6 use totally different subway and tunnel technologies as illustrated below in diagrams from DEIR Chapter 2 (PDF pages 57 and 103).

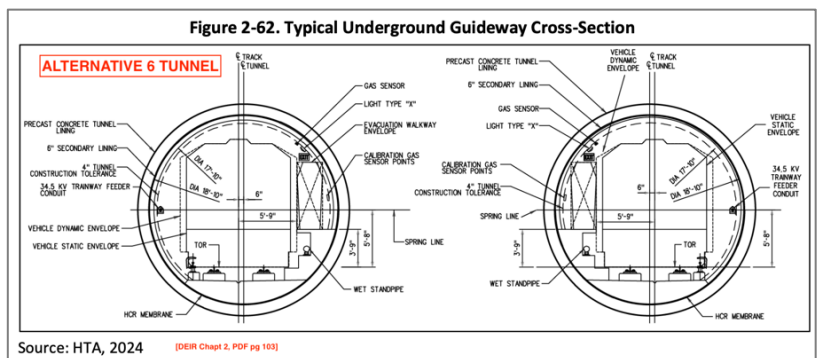
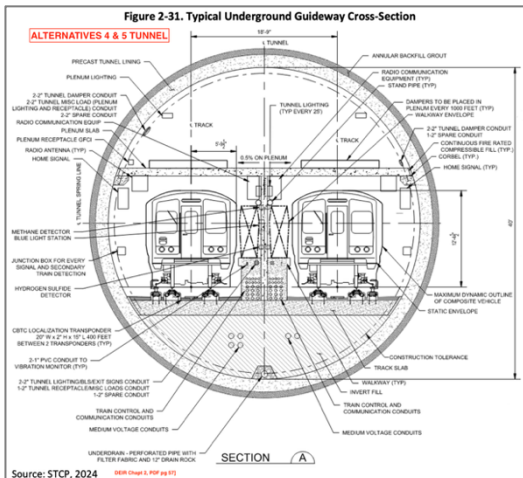
**Table 3.12-7 Summary of Potential Displacements by Alternative**

Land Use		Alternative 1 <sup>a</sup>	Alternative 3 <sup>b</sup>	Alternative 4	Alternative 5	Alternative 6
Commercial	Parcels	14	14	19	26	41
	Units	14	14	97	86	44
Industrial	Parcels	10	10	11	11	2
	Units	9	8	12	19	1
Institutional/Public Facilities	Parcels	2	2	1	1	1
	Units	2	2	1	1	1
Vacant/Undeveloped	Parcels	2	1	1	1	10
	Units	0	0	0	0	0
Mixed Use	Parcels	0	0	1	1	1
	Units	0	0	2 businesses 34 residential units	2 businesses 34 residential units	2 businesses 3 residential units
Multi-Family Residential	Parcels	0	0	3	0	1
	Units	0	0	168	0	124
Single-Family Residential	Parcels	1	1	9	0	0
	Units	1	1	10	0	0
<b>Total Parcels</b>		<b>28</b>	<b>27</b>	<b>45</b>	<b>40</b>	<b>55</b>
<b>Total Residential Units</b>		<b>1</b>	<b>1</b>	<b>212</b>	<b>34</b>	<b>127</b>
<b>Total Business Units</b>		<b>23</b>	<b>22</b>	<b>111</b>	<b>107</b>	<b>46</b>

Source: HTA, 2024 (DEIR Chapt 3.12, PDF pg 26)

<sup>a</sup>Includes the MSF Base Design and Electric Bus MSF. The parcels that would be used for MSF Design Option 1 would be acquired for the Alternative 1 or Alternative 3 alignment and are therefore also included.

<sup>b</sup>Includes the MSF Base Design. The parcels that would be used for MSF Design Option 1 would be acquired for the Alternative 1 or Alternative 3 alignment and are therefore also included.



Source: HTA, 2024 (DEIR Chapt 2, PDF pg 103)

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Alt 5 and Alt 6 are abnormally different and never should have been this way. These two Alternatives that should have used the same technology along different Valley routes morphed into modern technology under Sepulveda Blvd and old technology under Van Nuys Blvd. Metro knew this was happening but did nothing about it. Now it's a Fatal Flaw and the public needs Metro's explanation as to why and how it happened, plus its implications.

Alternative 5 uses automated driverless technology having two walk-through trains in a single large-diameter tunnel, with 2.5 minutes between trains and a 16,000-passenger per hour peak capacity. Walk-through trains allow a single security person to monitor an entire train, not just a single train car. Alt 5's stations have modern platform screen doors for additional safety against falling on the tracks. It was designed by the Bechtel consortium and could be built and operated under a public-private partnership (PPP) arrangement.

Alternative 6 uses older non-automated driver-operated technology having no walkability between train cars in twin smaller-diameter tunnels, with 4.0 minutes between trains and a 25%-lower 12,000-passenger per hour peak capacity. It does not have platform screen doors because current Metro Design Guidelines don't include them, as Metro representative Cecily Way explained during Metro's June 23<sup>rd</sup> virtual DEIR meeting Q&A session. It was designed by HTA Partners, Metro's environmental contractor, and cannot have a PPP arrangement because it was not designed under a Pre-Development Agreement (PDA) contract.

In addition, the Alt 5 and Alt 6 subway technologies are not interchangeable.

No one we have talked to understands how this confusing difference between Alt 5 and Alt 6 came to be. But to make matters worse, Metro also decided to make Alt 6 their "Proposed Project" as explained below from the DEIR Executive Summary (PDF page 7). We do not think that Metro's rationale for selecting Alt 6 as "consistent" and "familiar" is reasonable or viable.

*"Among the five project alternatives described in this DEIR, the Proposed Project is Alternative 6. Alternative 6 is consistent with the description of the Sepulveda Transit Corridor Project as presented to the public when Measure M was passed. In addition, the proposed design, construction, and operation of Alternative 6 are familiar to the Metro Board of Directors and the public, as they would be similar to Metro's existing heavy rail transit lines. In this DEIR, all alternatives, including the Proposed Project, are evaluated equally ... However, as permitted under CEQA, the Metro Board may select an alternative other than Alternative 6 as the LPA based on findings from the DEIR ..."*

How and why did Metro allow this inconsistency to happen? If you're not confused by now, congratulations – because we are. Two different subway routes. Two different subway technologies. No rationale for why. And by the way, the old-technology Alt 6 is one mile shorter than the modern-technology Alt 5, has 25% less passenger capacity for future growth, costs just a bit more to construct, and takes a year longer to build. Metro has again created yet another Fatal Flaw. The public deserves to know why this happened and possibly even how both Alt 5 and Alt 6 could use modern driverless technology to the benefit of everyone. Metro must provide all this information to fix this flaw.

### **Fatal Flaw 10 – Trivial Public Presentation Content**

As you have seen throughout this document, Metro has been consistent on one aspect of the project – their public presentation materials consistently fail to present information and detail that the public wants and needs – it's always coming later. Fatal Flaw 1 showed a presentation chart with minimal information on funding that was confusingly presented in ten-year-old 2015 dollars. It also showed a chart with capital costs for each Alternative in 2023 dollars – making it challenging to compare funding versus cost. Fatal Flaw 2 examined why Metro presented higher-than-expected monorail capital costs but provided no explanation rationalizing why the costs were higher. Fatal Flaw 4 showed a schedule chart with unrealistic schedules and no detail. Fatal Flaw 5 showed a suspicious ridership chart with no detail or rationale for its results. Fatal Flaw 7 showed a trivial public-private partnership chart that told the public nothing about how a PPP would be used on the STCP. We have many more examples that we could show.

Metro public meeting materials are simply light on content and detail that the public and often even Metro Board members need. Every Metro publication about their outreach efforts talks only about the quantity of events held and number of people who participated, but never about the quality and timeliness of the information presented at the

## **METRO STCP DEIR PACKAGE HAS 10 FATAL FLAWS POSTPONE BOARD PREFERRED ALTERNATIVE DECISION UNTIL FLAWS FIXED**

event or why it was appropriate at that stage of the project. In DEIR Chapter 5 on public participation, Metro continues to brag about how many public events they have held and how many people have attended – but provide nothing about the quality and timeliness of the information they presented. Sadly, most people we talk to who have attended Metro public meetings either know nothing about the project or are totally confused by it. Other people we've talked to told us they won't attend any more Metro meetings because they see the same old "garbage" (their word, not ours) at every meeting. This is consistent Metro behavior, even though the public keeps telling they want more detail.

It's hard to understand why Metro doesn't want to treat the public as important project stakeholders and give them details they ask for. One possible answer was revealed during Keep Bel-Air Beautiful's deposition of Metro Chief Planning Officer Ray Sosa. His response below to a question about why Metro considered it appropriate to talk with UCLA as a stakeholder but not the public in Bel Air is telling. It seems Metro doesn't consider all stakeholders equal.

*"Bel-Air is a residential neighborhood, a number of homes, an association of homes. You know, they – there isn't a facility that would require that same level of evaluation within that community." [Official deposition transcript page 206, lines 24-25 and page 207, lines 1-3]*

If Metro decides to postpone the Locally Preferred Alternative decision and fix these Fatal Flaws, they could demonstrate their renewed dedication to the public by holding detailed, full-of-information public meetings about how they fixed the Fatal Flaws and how they will proceed. It would certainly be refreshing.