



**SOUTH BAY CITIES**  
COUNCIL OF GOVERNMENTS

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October 9, 2018

Board of Directors  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Los Angeles, Ca. 90012  
Attention: Michele Jackson, Board Secretary

**RE: PROPOSED CRENSHAW / LAX – GREEN LINE OPERATING PLAN**

Dear L. A. Metro Board Members:

**SBCCOG RECOMMENDATION**

As a regional compromise, the SBCCOG supports C-3 for the opening day of the Crenshaw-LAX / Green Line connection. SBCCOG is asking Metro to operate opening day service using Option C-3 as a one-year pilot and then review the net operating subsidy of the service (operating costs minus fare revenues) to determine if C-3 is sustainable or if Metro needs to modify the service or revert to C-1.

Our support for C-3, which is also the first choice of the Gateway Cities Council of Governments, recognizes the fact that the C5, C-4 would better serve the South Bay on opening day and B-2 would better serve the South Bay riders once the Green Line is extended to the Torrance Transit Center. We also recommend that Metro implement additional capital improvements to make all of the options function more efficiently and more effectively serve Metro’s rail customers.

**BACKGROUND**

The SBCCOG previously requested that Metro consider Option C-5, C-4, or C-3 for the Crenshaw / LAX – Green Line opening day operations and make necessary capital investments to enable a transition to the B-2 operating plan by the time that the Green Line extension to Torrance opens in 2028.

The SBCCOG’s leadership has been instrumental in developing the L. A. County rail transit network since its inception in 1983. We have diligently supported regional planning that has developed an integrated network of lines with fully functional rail junctions. The Green Line has provided a one-seat ride between Norwalk and the El Segundo Employment Area since it was opened in August 1995. SBCCOG is very concerned that a significant portion of current riders will abandon the Green Line if C-1 is implemented.

We understand that Metro staff continues to recommend Option C-1 which will operate the South Bay rail segment as a rail shuttle service between Redondo Beach and LAX and eliminate direct Green Line service between Norwalk and Redondo Beach. We understand the C-1 operating plan has the following elements:

LOCAL GOVERNMENTS IN ACTION

Carson   El Segundo   Gardena   Hawthorne   Hermosa Beach   Inglewood   Lawndale   Lomita  
Manhattan Beach   Palos Verdes Estates   Rancho Palos Verdes   Redondo Beach   Rolling Hills  
Rolling Hills Estates   Torrance   Los Angeles District #15   Los Angeles County

1. Operate the Green Line and Crenshaw Line as a continuous one-seat ride between Norwalk and Exposition
2. Eliminate direct service operation of the Green Line South west of the Aviation/Imperial Station
3. Create a new Rail Shuttle Line segment between the Crenshaw/ LAX station at Century-Aviation and the former Green Line Redondo Beach station.
4. All current South Bay riders will need to transfer at Century / Aviation for either the Crenshaw / LAX line to Exposition or the Green Line east to Norwalk.
5. Eliminate the current one-seat ride between the South Bay and both the Silver Line and Blue Line.

#### REASONS FOR OPPOSITION TO C-1

Option C-1 is inconsistent with all prior rail transit system planning since the initial L. A. County Rail Transit Implementation Strategy was adopted in the mid-1980s. This new staff operating plan was never considered during the past 23 years of planning and was never assumed during the billions of dollars invested in the Green Line and Crenshaw / LAX projects. As a result, the SBCCOG is concerned that the new Rail Shuttle concept changes the expected seamless operating plan so significantly that it may require supplemental CEQA or NEPA environmental documentation process with appropriate consideration of potential environmental, financial, and customer convenience impacts of the alternate operating plans.

Option C-1 adds a 7 to 9-minute delay for current Green Line riders between Norwalk and Redondo Beach by forcing all riders to travel on the Crenshaw / LAX line to a transfer station at Century and Aviation to continue their trip on the Crenshaw/LAX line or Green Line. Riders travelling to the Westside, to Green Line destinations east of the Blue Line, to Santa Monica, Long Beach, and downtown LA destinations will need to transfer a second time at the Exposition Line, Silver Line or Blue line to complete their trip.

SBCCOG understands that Metro staff is concerned with operating costs, ridership and revenue estimates for opening day service. However, Metro's operating cost projections have been based on prior studies of individual lines and have not projected the synergistic ridership or revenue that can be expected when all three lines are connected or the negative results that may occur from transfer penalties that will be created by eliminating current Green Line direct service between Norwalk and Redondo Beach.

SBCCOG is also optimistic that the annual net subsidy costs differences between C-1 and C-3 will be lower than Metro has projected. For example, when Torrance Transit expanded its service to downtown L. A., the transit operator projected ridership would rise 70%. To the agency's pleasant surprise, ridership grew 125%.

#### NEEDED IMPROVEMENTS

The scrutiny of the Operating Options has spotlighted several improvements that SBCCOG believes should be immediately addressed. Regardless of whether C-3 or C-1 is selected for the opening day operating plan, SBCCOG urges Metro to complete the following improvements before or immediately following the opening of the Crenshaw/LAX line:

1. Add a pocket track at the La Brea Station to make the La Brea / Downtown Inglewood station the regular northern terminus for South Bay trains rather than only operating to this station on game days;

2. Increase traction power, if necessary, to enable 3-minute headways between the Aviation/Century station and the La Brea/Downtown Inglewood station;
3. Extend the Green Line Century/Imperial (LAX) station platform to accommodate 3-car trains;
4. Work with LAWA to retain current LAX G-Shuttle bus service from Aviation/Imperial Green Line station until the LAX Automated People Mover opens at the future Crenshaw / LAX 96th Street Station;
5. Provide expanded Metro, Torrance Transit and GTrans bus service on the Silver Line between the South Bay and downtown Los Angeles to extend the hours of service in the morning and evening as well as expand the morning and evening hours of the LADOT Express Bus services between the South Bay and downtown. Add connecting express bus service to accommodate South Bay transit riders that cannot use the rail lines south of the Redondo Beach / Marine Green Line station.

#### PREPARING FOR GREEN LINE EXTENSION TO TORRANCE

Based on data collected during the Alternative Analysis, Metro is preparing an EIR to allow determination of a locally preferred alternative and mitigations for the Green Line segment between Redondo Beach and Torrance. Although Metro staff has agreed to review the operating plan one year prior to the opening of the extension, SBCCOG is concerned that a one-year lead time would not allow enough time to design, fund and deliver additional capital improvements before the Green Line is extended to Torrance in 2028.

SBCCOG urges Metro to contemporaneously complete The Green Line Extension EIR and planning studies, engineering and conceptual cost estimates for improvements that are outside the Redondo Beach to Torrance EIR/EIS study area to ensure that operations can be transitioned to B-2 when the Green Line is extended to Torrance.

In conclusion, SBCCOG strongly supports Option C-3 and urges the Metro Board to adopt Option C-3 for opening day service and the first year of operation. We believe this option will attract more riders to the system while retaining current riders and will help Metro continue to provide and grow a first-class direct rail service.

Sincerely,



Britt Huff, Chair  
South Bay Cities Council of Governments  
Mayor, Rolling Hills Estates

c.c.:  
Metro Board Members / Alternates  
SBCCOG Board Members  
Phillip Washington, Metro CEO  
Jacki Bacharach, SBCCOG CEO