



**SOUTH BAY CITIES**  
COUNCIL OF GOVERNMENTS

2355 Crenshaw Blvd., #125  
Torrance, CA 90501  
(310) 371-7222  
[sbccog@southbaycities.org](mailto:sbccog@southbaycities.org)  
[www.southbaycities.org](http://www.southbaycities.org)

July 13, 2020

TO: [Metroplan@metro.net](mailto:Metroplan@metro.net)

SUBJECT: SBCCOG Comments on Draft Metro Long Range Transportation Plan (LRTP)

Thank you for the opportunity to make comments on Metro’s draft LRTP. The South Bay Cities Council of Governments (SBCCOG) has the following comments:

1. Compared to previous LRTP’s, the 2020 LRTP is critical. False assumptions will threaten the livability and perhaps even the viability of LA County in 2050. From what we already know, the upcoming 30-year period will be fraught with turbulence. Not only does the LRTP guide Metro investments and services but SCAG incorporates it into its RTP-SCS which influences RHNA and to land use plans throughout the county.

There are at least three significant dynamics that will change the quantity and quality of Metro’s transit market, all predicted or predictable, which have not been accounted for in the draft LRTP. They are:

- A. Technology: Electronic access is decreasing the need for the physical proximity that drives demand for mobility. The LRTP is based on an assumption that mobility networks and systems will return to the “old normal” after the virus has passed. That would require a return to business as usual. It seems more likely, or at least more prudent, to plan for the case where transactions are completed virtually rather than in physical spaces. This is especially true regarding work sites where telework has in many firms taken hold, in part because of employee preferences. Several technology businesses have declared that telework will become a permanent option, and close to home, the County of Los Angeles is making a broad range of worksite options available to its large work force.

New technology for collaboration and virtual presence has made the adjustment to COVID-19 feasible. Zoom, WebEx, and MS Teams, while not brand new, have become popular options available to facilitate remote work and a range of remote services including working from home (WFH), virtual government, telemedicine and online education. These technologies and others are certain to develop in the next few years, and to become permanent common options for work early in the next 30 years. Microsoft has already introduced its “Together Mode” to help the brain more effectively process meetings with many attendees shown on the screen. Imagine in the near future voice-activated ad hoc Zoom meetings with multiple participants. Proximity, while desired for many circumstances, will no longer be required except for a few interactions, with special approvals needed for nonessential travel.

- B. Environment: Climatologists have predicted with a high degree of confidence that extreme heat will affect life in all of Southern California long before 2050. The LRTP should include

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language that recognizes the phenomenon and include specific recommendations and budgets for transit service adaptations. The adaptations could include consideration of significantly increased investments needed for better air circulation systems in buses, on the rail platforms and train cars to ensure protection from future health concerns for both riders and operators. Without protection from the heat, few people will be willing to wait outside 20 minutes in extreme heat.

- C. New modes: The emerging micromobility phenomenon could easily grow to capture a sizable segment of the short range trip, five miles or less which already characterizes 70 to 75% of all trips today.

Automated vehicles in the form of “robocabs” should begin to appear in commercial service no later than 2025 with full scale deployment in many markets by 2035. Robocabs are essentially driverless robots that deliver door-to-door, no-transfer, on-demand service at rates lower than existing network transportation service. How much lower will be understood better in the next few years as more is learned about the higher capital expense per vehicle and lower operational expenses.

The LRTP should include a strategy for the market segment in which public transit can compete. For example, its most effective niche might be rapid, long haul, low cost service.

More specific comments:

- 2. Covid-19 may have dramatically and permanently changed Metro’s potential transit market share. The new paradigm of working from home (WFH) may continue to significantly exceed transit as it has in recent years especially as employers seek to improve their profitability by reducing their office expenses. Technologies such as virtual meetings and shared work software enable a new model for a significant share of the workforce that may reduce congestion, especially if WFH is integrated with transportation demand management (TDM).

The LRTP should more extensively address the potential long-term effects of WFH as a distinct mode and not refer to it as just another TDM strategy.

- 3. Metro staff has estimated it will need to charge 20-cents per mile in a Vehicle Miles Traveled congestion reduction fee to help fund an 81% growth in transit mode share from the pre-COVID 19 rate (a mode share change from 7% to 14%) over the next 30 years. This growth rate assumes that the current COVID 19 ridership levels are not relevant to LRTP assumptions and ridership will return to prior levels over the next two years which is an overly optimistic assumption even within the industry.

The LRTP assumes Faster Transit strategies will grow ridership by 7%, reduced/free fares will add 25% and VMT Fees will add another 18%. The balance will come from future travel trends and compound effects, and Measure M. We disagree with the projection’s assumption that pre-COVID riders will return as Safer At Home restrictions are lifted. Metro assumes the pandemic will not have permanent ridership impacts. Therefore, Metro has chosen to consider COVID 19 as a short-term impact and has compounded a full recovery with a trend-based expansion factor and the other strategies to create its 81% total growth rate. That rate has driven the sizing of the fleet, capital and

operating/maintenance expenses sufficient to carry the projected ridership which puts into question whether the LRTP can be considered financially constrained. In addition, the LRTP states that reduced / free fares are contingent on a 20-cent per mile VMT tax. The combined assumptions of post-COVID 19 ridership recovery, background trend growth, a speculative VMT tax enabling free fares, and other hazy assumptions have created a strategic house of cards that should not be used to predict an 81% growth rate in transit ridership.

The LRTP describes the possibility that Metro could have free fares if the VMT tax were adopted. According to a chart on page 13 of the report, the combination of the two strategies would attract approximately 500,000 additional daily transit trips.

To help fund the transit expansion using VMT fees (the fleet, operation and maintenance cost of which is not fully identified) if average annual travel for a vehicle is 12,000 per year in Los Angeles County and the fee is 20-cents per mile, the average vehicle owner in L. A. County would pay \$2,400 per year in VMT fees.

SBCCOG believes that a 20-cent-per-mile VMT fee is both regressive and unrealistically high. Assuming that the VMT fee will fund transit expansion is based on two incorrect assumptions:

1. Determining what level of VMT revenue would be needed to fund the level of transit expansion desired; and,
2. Causing enough financial pain that rational travelers will abandon their vehicles and flock to transit at nearly-double the pre-COVID transit rate.

The strategy is designed to punish vehicle travel to the point that the VMT monthly cost exceeds the average transit fare. But it is unrealistic to expect owners to completely abandon their vehicle. So, transit riders will need to pay the transit fares and the VMT fee for those trips that are not practical on transit.

We believe the VMT fee will have a negative effect on transit ridership because it will be absorbed in annual vehicle ownership costs while transit trips must be paid for on a per-trip basis and, thus, are more discretionary for those with access to a vehicle. We expect it will more likely lead to ridesharing, telecommuting and working from home rather than dramatic increases in transit use. While the VMT fee will likely reduce VMT, may reduce the daily duration of the a.m. and p.m. peak periods, and may reduce vehicle ownership and use, we do not understand how it will double pre-COVID 19 rates of transit ridership.

Additionally, if a VMT fee is imposed, it will be extremely important and we strongly urge Metro to equitably allocate VMT revenues earmarked for transit purposes between Metro and the Eligible Municipal Operators.

On page 61, the report states, "Metro is considering free transit for students, and if additional revenue is raised through congestion pricing, Metro could subsidize transit for all riders." The language needs to be updated to reflect the recent Board direction on student and other fare discounts. Clarification is needed regarding the financial cost (including increased capital and operations costs) of providing free/subsidized fares from VMT fees and the financial assumptions for any other transit strategies that will be funded with VMT fees.

4. On page 66, the report states, “While the expanded programs, partnerships, and policies of the 2020 LRTP represent additional expenditures, these will be balanced by future revenues anticipated through future policies, such as ExpressLanes and congestion pricing.” It is impossible to confirm this statement from the narrative in the LRTP. A chart is needed that clearly describes the sources, uses, and amounts for each of the funding sources.
5. The LRTP needs to provide more detail on the capital, operating and maintenance cost of achieving a 14% transit mode share which would likely double Metro and municipal transit operator costs. Metro should also be transparent in its projected farebox recovery assumptions and the other funding mechanisms assumed in its goal to increase annual transit trips per capita by 81% over the next three decades.
6. Page 20 - In the Better Transit section, the Metro Rail Expansion paragraph on near-term projects includes the West Santa Ana Branch, but does not include the Green Line Extension to Torrance which is in its environmental clearance process. Please correct the omission or eliminate the narrative reference to specific projects and refer readers to the complete list on the following page.
7. Page 28 - In the More Transit Trips Mean More Opportunity page, please add a column in each chart for the current daily transit trips and transit mode share for commute trips. Also add a chart for transit mode share for daily trips. It is important to distinguish between commute and daily mode shares in order not to understate the relative size of the non-transit daily and commute trip mobility challenge which exceeds 85% of the congestion problem.
8. Spending \$160 billion to increase the transit mode share from 7% to 14% may not be the most cost-effective way to reduce congestion compared to strategies that eliminate trips. Metro is not just a transit agency, it is a mobility manager. The LRTP does not provide sufficient attention to trip elimination which has the potential to reduce travel far more than 14%. Please evaluate the cost benefit of the wide range of trip reduction strategies that do not rely on a mode shift but simply eliminate the need for the trip.
9. Page 34 – A portion of the I-405 South Bay Improvements are scheduled for completion before the 2028 Olympics, but the Major Highway Projects shows the project opening in 2047. There should be a Phase I and Phase II with the appropriate cost and Open Year.

The I-110 ExpressLane extension should not wait until 2046 to open. The extension should be the first priority for surplus revenues generated from the existing I-110 ExpressLane, before these funds are committed to other new ExpressLane projects such as the I-105 ExpressLane which is slated to open in 2025.

10. Page 67 – The pie chart shows that \$66.8 billion (17%) of the \$400 billion in the LRTP will come from “Other Local” sources. Please list the sources and amounts assumed and the proportion assigned to capital vs operations.
11. Page 74 – Although the LRTP is financially constrained over its 30-year term, there is no transparency as to funding constraints by decade. Metro regularly updates its financial forecasts with decade-by-decade transparency, but these financial constraints are not shown in the LRTP. Instead project opening dates are used. As a result, short- and long-term consequences of financial

challenges such as COVID 19 are not explicitly addressed in the LRTP and make the issue of financial constraint hard to assess.

How will the upcoming SRTP be constrained consistent with the LRTP decennial budgets and schedules assumed in the LRTP? Will the SRTP provide more transparency on the first decade funding available per the LRTP and its underlying financial assumptions and allocations?

The LRTP includes projected costs for major transit and highway projects. But the document also includes dozens of programs that are described without the cost of individual program / project / policy / strategies being identified. The LRTP should provide a summary table of the costs for each of the four major initiatives beyond the major projects.

12. Finally, the Next Gen Bus Study is referenced several times in the LRTP with numerous embedded strategies and actions. The LRTP projects a 13% reduction in traffic delay once the recommendations are implemented. The key goals of the Next Gen study are to ensure that: transit service is: 1, accessible to nearly all potential riders and serves 2020 destinations; 2. improves travel speeds by dedicating bus-only lanes on streets; 3. provides transit priority at signalized intersections, and reduces the number of local stops.

The study states that with these strategies, Metro hopes to make a transit trip take no more than 2.5 times the time a comparable trip takes in a vehicle. We do not understand how much these strategies will cost or how a 2.5X travel time delta would attract a projected 7% increase in transit ridership.

The innovation in the LRTP appears to be largely driven by new transit projects, policies and pricing strategies but it does not address the way travel, technology, work and commutes are changing. Traditional public transit has been declining for over 10 years in Los Angeles County, pre-COVID – and we are concerned that this LRTP focuses too much on business as usual.

Sincerely,

Olivia Valentine, SBCCOG Chair  
Councilmember, City of Hawthorne