



North Los Angeles County Transportation Coalition

July 13, 2020

TO: Metroplan@metro.net

FROM: NCTC JPA Comments on the Metro Draft Long Range Transportation Plan (Draft LRTP)

Thank you for the opportunity to comment on the Metro Draft Long Range Transportation Plan (Draft LRTP). For decades, North Los Angeles County Transportation Coalition (NCTC) Subregional members comprised of the Cities of Lancaster, Palmdale, Santa Clarita and the unincorporated 5th Supervisorial District north of the I-5/SR14 Interchange, have repeatedly sought equitable transportation funding through decisions made by the Metro Board in downtown Los Angeles.

With the voter approval of Measure R in 2008, Measure M in 2016, and CA SB1 in 2018, the NCTC Subregion was able to receive funding for critical transportation mobility projects stuck in a funding bottleneck as bad as traffic through the Newhall Pass. The CA State and Los Angeles County taxpayer measures became critical to cover the funding gap created as federal transportation policy placed the cost of transportation infrastructure primarily on the backs of state/local governments.

The creation of the formal NCTC JPA in 2017, has strengthened the partnership with the agencies responsible for transportation policy and funding in Los Angeles County: Metro, Caltrans, Metrolink. The NCTC JPA Subregion thanks the current Metro leadership led by Mr. Phil Washington, CEO, who with his Planning staff, have worked hard to listen and act on the delivery of key mobility projects for north Los Angeles County residents and businesses.

Oh Those Metro Maps

Seeking equitable funding for north Los Angeles County mobility projects has not been the only challenge—inclusion on the Metro “maps” has been just as formidable. NCTC Subregion elected officials, public officials, Executive Director, civic, and business leaders routinely go to Metro meetings to receive handouts and maps that do not depict north Los Angeles County—either excluded from an insert table or occasionally, nonexistent on the map.

The NCTC Subregion in north Los Angeles County must continually strive to be on the “map,” for example:

- None of the maps show SR138 connecting the I-5 to the SR14.
- SR138 is on most maps but is usually covered with the map legend.
- June 7, 2019 Draft LRTP Board Report and Baseline Understanding Appendix, pg.84, Metro ranks NCTC Subregion #1 Total Area Subregion, but leaves SR126 and SR138 off the map.

The Metro Draft LRTP illustrations need to depict the north Los Angeles County subregion properly.

Metro Investment with NCTC Subregion Gets Funding and Transit Ridership Results

The sentiment that transportation funding was not equitable for the NCTC Subregion, led the NCTC Board of Directors to ask for a Funding Analysis and Snapshot report. The report complied with the assistance of Metro Countywide Planning and Development and the NCTC staff members is in final development.

The NCTC Subregion draft funding analysis details formula and discretionary funding to the region from FY2018-24. The draft analysis shows that for transportation discretionary grants, the NCTC region is doing exceptionally well.

When the NCTC Subregion partners with Metro and Metrolink seeking discretionary federal and state grants, we have a near 100% success rate. That is not a typo, \$401 million in three recent federal and state grant examples:

- I-5 North Capacity Enhancement Project received a total of **\$294 million in grants**, including private sector funding obtained by the Subregion:
 - ✓ Federal \$47 million INFRA grant and
 - ✓ CA State \$247 million TECP grant.
- AVL Service Improvements received **\$107 million** TIRCP grant award matched with 53% of NCTC Measure M MSP Subregional funds (\$116.3M).

In July 2019, the Metro AVL Study had **jaw dropping results for north Los Angeles County**:

- AVL Ridership Steadily Increasing—since **July 2015**.
- **29% Ridership Growth on the AVL July 2015 to July 2019**
- Metro initiated the \$5.5 million investment in the Ridership Fare Reduction Program—**AVL ridership has grown 29%** as of June 2019. The program is so successful that even after Metro lowered the fare reduction investment to \$2 million in July 2018, ridership has continued to steadily increase.
- **AVL HAS SEEN INCREASED RIDERSHIP IN LOS ANGELES COUNTY.**
- AVL achieves **over 11% transit mode split** for trips generated in the Antelope Valley and nearly 10% for trips generated in the Santa Clarita Valley.
- AVL Service Improvement Scenarios for frequent, clock-based transit to/from Lancaster to/from LA Union Station in less than 90 minutes is achievable for \$698.1 million.

Following the Northridge Earthquake in 1994, total trip time on Metrolink rail service to/from the Antelope and Santa Clarita Valley's has seen little improvement. The AVL Study clearly demonstrated that with modest investment—**\$698.1 million**—Metrolink service can provide the frequent transit trip to compete with the car trip on the freeway. (*Metro AVL Study Metro Report, July 17, 2019 Metro Planning & Programming Committee*).

In this Draft LRTP period, the NCTC Subregion realistically sought the \$220m Metrolink Antelope Valley Line Capital and Service Improvements Project scenario option with NCTC allocating 53%, \$116.3M in Measure M matching funds used to achieve the TIRCP \$107 million grant award. The \$220m AVL capital improvement project entering environmental clearance will provide a real rail alternative to the freeway trip—for **the \$698.1 million AVL project**, the NCTC Subregion must **wait for the next 30-year plan**.

Metro partnering with the NCTC Subregion to seek funding opportunities produces results, returning federal and state tax dollars to the LA region's transportation projects as the north Los Angeles County residents respond by using the viable transit alternative provided.

Freeways Can Not Be Forgotten

The Draft LRTP provides a Snapshot of the North Los Angeles County NCTC Subregion transportation network (*Baseline June 2019 LRTP Metro Report pages 85/86*).

Major Transportation Facilities

Area freeways include the Golden State Freeway (I-5) and the Antelope Valley Freeway (SR-14). State Route SR-126 and SR-138 also impact the region. Metrolink operates commuter rail services with stations located in the cities of Lancaster, Palmdale, Santa Clarita, and in unincorporated areas of Los Angeles County.

For the NCTC Subregion funds in the LRTP programmed to highways and arterials is imperative. Los Angeles County relies on the freeway network to move people and goods. Is 26% highway funding for the entire Los Angeles County sufficient over a 30-year period? The NCTC Subregion has limited viable alternatives to the freeway network.

The main connection for the Antelope Valley and Santa Clarita Valley to the LA Basin and beyond is the freeway system with limited regional rail connections through Metrolink. The Metrolink AVL is the only true mobility option that does not use the freeway system. Even Santa Clarita Transit and Antelope Valley Transit Authority (AVTA) use the freeway system for their transit service between the Valley's and into the LA Basin.

Metro asks the NCTC Subregion to be patient for the regional rail alternative transit option, while spending less on the freeway system—NCTC has concerns with this long-term transportation planning approach for the north Los Angeles region.

The Draft LRTP has the expansion of the Express Lanes Strategic Network, i.e. tolling/congestion pricing proposal, for the entire County by 2045. (Page 33, Figure 13, Tier 3 Draft LRTP). The NCTC JPA has not taken a formal position on the Metro Express Lanes Strategic Network expansion—but a majority of the NCTC Board has publicly expressed **serious concerns** with the Metro congestion pricing/toll lanes proposal and how it adversely impacts north Los Angeles County residents and businesses, especially those in the Equity Focus Communities (EFC). Ironic, the best map in the Draft LRTP depicting the NCTC Subregion seeks additional congestion pricing.

The NCTC Subregion believes more funds should be spent in the Draft LRTP for life-saving highway projects like the SR14 and SR138. At every NCTC JPA Board meeting, the NCTC receives public testimony from Neenach, Antelope Acres, and Oso Town Councilmembers on the NW SR 138 Corridor with powerful visuals of fatal accidents as they urge Caltrans, Metro and NCTC to approve roughly \$90 million in safety related fixes detailed in the Metro approved EIR connecting the I-5 to the SR14 along the SR138 corridor. (*Metro Northwest SR138 certified EIR, 2017*)

Metro and Caltrans staff have heard the northwest SR138 corridor public comment and have sought traffic calming, signage, and other measures, but concerning the safety related expansion projects including passing lanes, the NCTC Subregion is told to be patient, Metro and Caltrans do not have the funding for these freeways/highway projects.

The freeway/highway arterial network is part of the NCTC Subregion transit system. For many north Los Angeles County residents, transit options have many transfers, take numerous hours, and are not available 24/7 to match their work schedules.

As the Metro Board seeks to Reimagine The Highway System, please acknowledge that the NCTC Subregion needs to improve chokepoints along the SR 14 and SR 138 which are above the CA allowable accident rate according to Caltrans (*Caltrans SR14 Traffic Safety and Operational Analysis, July 2019*).

May 14, 2020 Tweet by Transportation Policy Director to a Metro Board Member:

“Those who stand to be the most impacted by the policy or program should hold the most power in the decision-making space, but they rarely do” by Ms. Ariel Ward, A Tale of Two Truths: Transportation and Nuance in the Time of COVID-19, May 13, 2019 www.medium.com

Transportation professionals need to make space for critical questions even when—or especially when—its inconvenient. May 14, 2020 Tweet by Transportation Policy Director to a Metro Board Member

Demographics in North Los Angeles County

The recent Covid Pandemic highlights how all of Los Angeles County relies on the NCTC Subregions first responders and essential workers—on 24/7 shifts throughout Los Angeles County. We appreciate and are proud of our north Los Angeles County neighbors for the work they have done during the pandemic to provide essential services to keep us healthy, safe, and secure, while stocked with essential goods. Thank You!

It is understandable that city, civic and business leaders are reticent to headline Equity Focus Communities (EFC) in economic development brochures touting the benefits of their city, but US Census Bureau statistics, Metro demographic maps tell the story—NCTC Subregion needs Equity:

- One in three in the Antelope Valley live in Equity Focus Communities—yet Lancaster and Palmdale appear to have no projects listed in the Draft LRTP.
- Black/African American population: Lancaster 21.8 %, Palmdale 12.5%
- Asian population: Santa Clarita 11%
- Hispanic or Latino: Lancaster 39.7%, Palmdale 60.2%, Santa Clarita 33.5%
- Persons in Poverty: Lancaster 23.8%, Palmdale 17.3%, Santa Clarita 8.6%
- School Free/Reduced Lunch Program, Lancaster K-6 eligible: 75%
- Veterans average population in AV & SCV is 6.1%, above LA County 3.5% & CA 5.4% avg.
- Veterans average population: Lancaster 7.5%, Palmdale 5.8%, Santa Clarita 4.9%
- Persons without Health Insurance, under age 65: Lancaster 7.5%, Palmdale 10%, Santa Clarita 7.5%
- Persons 65 years and over: Lancaster 9.8%, Palmdale 18.9%, Santa Clarita 11.3%

NCTC Subregion officials need Metro assistance to connect with the impacted Equity Focus Communities in the Antelope and Santa Clarita Valley’s.

Draft LRTP Specific Section Comments

The NCTC urges Metro to disregard the one size fits all policies and allow each subregion flexibility to determine the best plan for their region. The Draft LRTP clearly illustrates the unique geography of the NCTC Subregion, ranking the subregion 1st in Total Area.

- Lancaster and Palmdale have Equity Focus Communities (EFC), but no projects appear to be listed in the Draft LRTP.

- Figure 14, only North County project shows I-5 from 14 to Lake Hughes, should be to Parker Road.
- Figure 15, I-5 improvements, should be moved from planned to build since fully funded.
- Figure 26, when combine all the bus and rail categories, 57% of the funding going towards these categories versus 26% for highways/multimodal projects
- Plan states that complete streets and Active Transportation will come out of roadway money
- Page 70, SHOPP funding estimate LA County, how is the \$22B derived and doesn't Caltrans allocate the SHOPP Program? The NCTC Subregion has successfully worked with Metro and Caltrans to allocate SHOPP funds to the I-5, SR14, SR138, and SR 126.
- Metrolink and Goods Movement very limited discussion. In fact, no projects listed.
- The Draft does not depict the Subregional list of projects, rather that is listed in a separate Baseline Report from June 2019.
- No mention of the Metro Call For Projects Program.
- Highway Program—Can the SR14 and SR138 access Rural highway grant funds? Why do those rural corridors compete with urban I-5, I-405, I-10, etc. corridors for funds?
- June 7, 2019 Draft LRTP Board Report and Baseline Understanding Appendix, page 84, Metro ranks the NCTC Subregion #1 Total Area Subregion, but there is NO SR126 or SR138 on the NCTC specific map shown. Page 86, states Palmdale is largest City in North County—should clarify this for land area? Population would be Santa Clarita largest.
- Will the Subregional Section with maps/descriptions be in the Final LRTP?
- Will there be a Strategic Unconstrained Funding Section?
- No maps show SR138 connecting the I-5 to the SR14.
- SR138 on most maps, but usually covered with the map legend.
- There is no I-5 symbol illustrated in north Los Angeles County, just central Los Angeles.
- Transportation Demand Management (TDM)/Transportation System Management (TSM) programs are not mentioned in the Draft LRTP
- Since the Metrolink Antelope Valley Line Capital and Service Improvements Project is funded, should it be depicted in the Draft LRTP tables?
- How can north Los Angeles County access numerous programs that appear to be centered/focused around the Metro Service Area, like Micro-Transit? Is the TDA Article 8 process supposed to remedy the apparent structural funding inequity to north Los Angeles County taxpayers?

NCTC Urges Equitable Funding

In conclusion, the NCTC Subregion appreciates the bolstered partnership with Metro and the opportunity to comment on the Draft LRTP—Our Next LA, and we urge meetings with Metro and NCTC staff to discuss the Draft Plan prior to receiving the “matrix” responses in the Final Plan.

The NCTC Subregion has sought mobility improvements for north Los Angeles County—the I-5, SR14, SR138, SR126—while seeking improvements to the only rail service to the region—the Metrolink Antelope Valley Line (AVL). The only Metrolink line entirely within Los Angeles County.

The NCTC subregion has continually made the case for equitable transportation funding and when given the opportunity to partner with Metro we have seen tremendous results, from receiving federal and state grant awards, to residents using the new transportation improvements at levels way above the rest of Los Angeles County.

For many north Los Angeles County residents, transit options have many transfers, take numerous hours, and are not available 24/7 to match their work schedules. For the #1 Subregion in Land Area, the freeway arterial network is part of the transit system residents rely on. The SR14 and SR138 serve many of the Equity Focus Communities in the Antelope and Santa Clarita Valley's and residents are seeing accidents and fatalities rise above "acceptable" Caltrans standards.

Funding must be included in the 2020 LRTP Plan to provide safety-related improvements by both Metro and Caltrans to north Los Angeles County residents and businesses using the SR14 and SR138. The NCTC Subregion has seen enough studies and plans for safety related fixes for the SR14 and SR138—they need to be funded and completed in this LRTP Plan. North Los Angeles County residents should not have to endure more fatal accidents due to lack of highway funding.

The NCTC Subregion has sought viable alternatives to the freeway, but the region is constantly told to wait your turn for Metrolink Antelope Valley Line rail improvements. We urge Metro and Metrolink to fund the \$698.1 million AVL improvements in the 2020 LRTP Plan—now.

The Census Bureau and Metro demographic map facts cannot be swept under the rug any longer, **Equity Focus Communities exist in north Los Angeles County** and it is time Metro acknowledges the Subregion needs "boxes to stand on" with action, planning assistance, and funding. The NCTC Subregional staff has limited resources to properly address the Equity Focus Communities myriad of issues. The NCTC JPA needs Metro's assistance.

The NCTC Subregion looks forward to working with Metro and all transportation partners in Los Angeles County to make critical mobility investments in north Los Angeles County over the next 30 years.

Sincerely



Arthur Sohikian
Executive Director
North Los Angeles County Transportation Coalition JPA

CC: NCTC JPA Board of Directors