



149 South Barrington Ave.
Box 194
Los Angeles, California 90049
www.bcc90049.org

January 10 , 2024

Los Angeles County Metropolitan Transit Authority
One Gateway Plaza
Los Angeles, CA 90012-2952
Attn: Mark Vallianatos (VallianatosM@metro.net), Anthony Chica
(ChicaA@metro.net), trafficroduction@metro.net

RE: Brentwood Community Council Opposition to Traffic Reduction Study (TRS)/ Congestion Pricing on the Westside of Los Angeles

Dear Mr. Vallianatos and Mr. Chica,

Thank you for presenting Metro's Traffic Reduction Study (TRS) to the Brentwood Community Council (BCC) on December 13. The Brentwood Community Council ("BCC") is the broadest based Brentwood community organization, representing approximately 35,000 stakeholders of the 90049 community. BCC includes 13 homeowners' associations, multi-family residential dwellers, business organizations, schools, religious groups, volunteer service groups, public safety and environmental organizations.

As you know, our area suffers from extreme traffic congestion during peak hours as commuters from all over Los Angeles try to get to and from jobs in Westside cities like Santa Monica.

In particular, commuters driving from Santa Monica to the Valley cross Brentwood as a diagonal shortcut to enter the I-405 freeway at the Sunset Blvd. and Wilshire Blvd. on-ramps in order to avoid congestion on the I-10 and I-405. These drivers are taking east-west streets like Sunset Blvd., San Vicente Blvd., Montana Ave., and Wilshire Blvd and north-south streets like Bundy Drive and Barrington Ave.. to avoid the I-405/I-10 interchange due to its severe back-up. That is why we are keenly interested in Metro's proposed study on congestion pricing and its inevitable impact on Brentwood.

The BCC strongly opposes the implementation of congestion pricing on the I-10 west of the 405 and in the Santa Monica mountains on the Westside (including Sepulveda Blvd., Benedict Canyon, Roscomare Road, and Coldwater Canyon) and we request that no recommendation be made to the Metro Board to study these areas further until after the Sepulveda Transit Corridor (STC) and D/Purple Line (Wilshire Blvd.) projects are completed and their impact can be determined.

Implementing congestion pricing in these areas would simply displace cars from the freeways onto our already gridlocked streets and we do not see evidence that it can achieve the desired goal of reduced vehicle trips. Merely displacing cars to side streets does not achieve the goal of the TRS.

We object to any further consideration of congestion pricing until after the STC's implementation for the following reasons:

- Lack of public transit alternatives for drivers – Unlike other parts of the city, drivers passing through Brentwood and other points west of the I-405 have extremely limited public transportation alternatives, and no options to get to the Valley.

Based on the information we've seen to date, it appears that the study area is looking at the impact on east-west traffic along the I-10 freeway, ignoring the impact of the cut-through traffic to the Valley whose drivers currently have no public transit alternatives.

The theory that fewer drivers will drive in peak hours if tolls are implemented is realistic only if drivers have another way to get to their destinations. Cities like London, Stockholm, and New York have excellent transit alternatives that do not exist on LA's Westside.

Anyone going east from Santa Monica, Brentwood, and other areas west of the I-405 already avoids driving in afternoon peak hours, which typically run from 3 pm to 7 pm Monday through Friday. During these hours, all of the streets mentioned above are gridlocked, as are the freeways.

Given how miserable the drive is, the only people who initiate trips during these time blocks truly have no current option to move their drives to another time or to work from home that day.

- Impact on neighborhoods – Quality of life in Westside neighborhoods is already severely negatively impacted by the traffic caused by drivers trying to avoid gridlock on the freeways. Implementing tolls will simply cause additional drivers to cut through neighborhoods instead of staying on the freeways. However, for quality of life, cars need to stay on the freeways whenever possible, not move into neighborhoods to avoid tolls.

What benefit is gained by trying to free up freeway capacity at the expense of neighborhoods?

At the BCC presentation, you said that good local data hasn't been available to assess the impact on neighborhoods. Certainly, unless data exists that runs counter to the logical conclusion that more cars will cut through neighborhoods if tolls are added, the Metro Board should not be considering congestion pricing.

- Tax on middle class and other drivers - Implementing congestion pricing simply adds a tax on drivers whose lives are already extremely negatively impacted by existing traffic conditions. This tax does not just hit residents

of the Westside. Commuters come from all over LA County to work in areas like Santa Monica, Venice, Brentwood, and Playa Vista. Adding subsidies for low-income drivers is nice but it does not help the vast majority of commuters who have no other options for their drive time. They will have no other options until the D Line is complete and some form of the STC project is implemented. Adding this tax also will negatively impact the desirability of building up new “Silicon Beach” technology businesses, hence taking away revenue to the County.

- Lack of consideration for other Metro projects in the same area - Looking at the TRS without including data to show the impact of a project in the Sepulveda Transit Corridor makes no sense. Given that one of the STC alternatives appears likely to be approved, the projected baseline traffic, including its implementation, should be used. Otherwise, potential benefits from TRS are overstated.
- Lack of transparency on TRS/Congestion Pricing – While we very much appreciate the presentation to the BCC, the TRS project has not been at all transparent to the Westside community. We have heard from Supervisor Horvath that the Metro Board directed Metro staff to obtain community input on TRS but do not feel that this has been accomplished:

It is our understanding that your presentation to the BCC was the only presentation of the project made on the Westside. Other groups like WRAC’s (Westside Regional Alliance of Councils) Transportation Committee requested a similar presentation but were denied.

- The BCC made numerous requests over a period of several months in order to schedule this presentation, and even after it was scheduled, Metro asked whether they could cancel it.
- We were directed to attend a presentation in Westwood on the STC at which a few boards on TRS were included in the room. However, TRS was not addressed in the STC presentation and the time allowed

for attendees to review the boards on the TRS and Express Lanes projects to get up to speed and ask questions was extremely limited. No one could look at the boards or ask questions during the STC presentation.

- We were provided no explanation at the meeting of what data or methodology was used (other than SCAG (Southern California Association of Governments) data. The charts stated only differences without indicating what the starting and ending points were or what time period was being used in the calculations. We've made some guesses to interpret the data,¹ but absent any explanation, these do not seem to provide a significant enough benefit to justify congestion pricing.
- No data was provided on the impact on local streets and neighborhoods.
- No data was presented to show that existing toll lanes in DTLA have reduced traffic and encouraged drivers to switch to public transportation.
- At the BCC meeting, we were told that a follow-up meeting would be scheduled to discuss methodology data and to address more questions than could be asked during the limited presentation time. However, when trying to schedule a follow-up we were told that we could not schedule any further meetings.
- A few of our community members did attend the single 90-minute Zoom webinar scheduled by Metro for TRS. This presentation covered all of the study areas, not only the Westside. The time

¹ Using our math skills, we think that the charts show average speed on the I-10 going from 43 MPH to 47 MPH if it increases by +4 mph and 9.3% but this seems unlikely to be the average speed for peak hours only, or if it is it doesn't argue for charging all drivers tolls. Similarly, based on the data we think that the Santa Monica mountains may be projected to increase from 24.8 mph to 28.8 mph at a +4 mph and 16.1% improvement. None of these numbers in our opinion justify a huge cost to our communities both in dollar terms and in other impacts.

allocated to ask questions was very short and didn't give much opportunity to ask Westside-specific questions. On this call you stated that Metro's outreach on the TRS was conducted with input from 200 community members in a county of close to ten million --- your outreach efforts have been woefully inadequate.

We note that other projects like Sepulveda Transit Corridor have done an excellent job of communicating with the community, scheduling many meetings throughout the process both on a regional basis and to community organizations that have requested them.

Based on all of these points, the Brentwood Community Council believes that Metro should complete the STC and the D/Purple Line before it considers projects like the Traffic Reduction Study/Congestion Pricing that would have a severe negative impact on Westside communities. Metro should not be pushing traffic from freeways onto city streets.

We strongly object to further study and consideration of the Traffic Reduction Study unless and until more meaningful dialogue with the communities most affected by TRS is completed and a majority of these communities agree to such further study. Without this dialogue and the identification of sufficient public transit alternatives, no further study should move forward. We also request more transparency in the process, including access to the information underlying the study's assumptions and an explanation of the methodologies used.

Thank you for your consideration.

Sincerely,



Lauren Cole

Transportation Representative, Brentwood Community Council

Los Angeles County Metropolitan Transit Authority

January 10, 2024

Page 7

Cc: The Honorable Karen Bass
Marian Ensley, West Area Representative, City of Los Angeles
Lindsay Horvath, LA County Supervisor, 3rd District
Carolyn Jordan, Chair, Brentwood Community Council
Traci Park, Councilwoman, Council District 11
Katy Yaroslavsky, Councilwoman, Council District 5