UCLA Administration

Office of the Vice Chancellor
2211 Murphy Hall
Box 951405
Los Angeles, CA 90095-1405

August 30, 2025

Peter Carter
Project Manager
Metro
One Gateway Plaza, MS 99-22-6
Los Angeles, CA 90012

Submitted electronically to: sepulvedatransit@metro.net

RE: UCLA Formal Comments on the Sepulveda Transit Corridor Project's Draft Environmental Impact Report

Dear Mr. Carter:

The University of California, Los Angeles (UCLA) appreciates the opportunity to comment on Metro's Sepulveda Transit Corridor (STC) project following the release of the Draft Environmental Impact Report (DEIR). As a Trustee Agency for the STC project, UCLA has a significant interest in the project's design, impacts, and mitigation measures, especially those affecting the UCLA campus in Westwood. While we recognize that the decision of whether and how to advance this project rests with Metro and its Board of Directors, if the STC line is to be built, we believe it is critical that the project be designed, constructed and operated in a manner that creates an effective transit conduit to our public university, while minimizing long-term impacts to UCLA's core educational, research, public service and healthcare mission.

While other UCLA stakeholders may submit separate feedback, this correspondence represents UCLA's formal comments regarding the DEIR.

UCLA is home to more than 48,000 students and nearly 42,000 employees, in addition to thousands of daily patients and visitors. The campus sits within the Westwood neighborhood of Los Angeles, a densely developed and highly trafficked area (especially along Wilshire Boulevard) constituting one of the most congested areas in the region. Westwood currently lacks rail transit. While the Metro D Line extension (expected to open in 2027) will partially address this issue by providing a connection to the east, a significant need remains to connect Westwood and the Westside with mass transit north to the San Fernando Valley and points south. Furthermore, the D Line Westwood station is located nearly one mile from the center of the UCLA campus and not directly accessible to the university. In addition to providing mass transit opportunities to and from the San Fernando Valley, four of the STC Alternatives also resolve this nearly one mile gap between UCLA and the D Line.

If Metro moves forward with the STC line, the locally preferred alternative should benefit the most people, connect not just West LA and the San Fernando Valley, but connect people with Metro lines across the region. Completion of the STC project could improve mobility and accessibility and foster a higher quality of life throughout the L.A. region — including for thousands of our students and employees who commute long distances across the Southland to work or learn at UCLA. Proper

construction of the STC, including a station on or adjacent to the UCLA campus and a seamless connection to the D Line, will provide much needed and improved transit options to ensure Angelenos can access major employment, educational and cultural centers across Los Angeles.

We appreciate and acknowledge that each community may see the project differently. Our views in this letter relate specifically to the direct impacts on the UCLA campus community – namely those who travel to and from UCLA for employment, education, healthcare, events, and more. In reviewing the DEIR, UCLA has outlined below several of our key conclusions, concerns, and preferences.

1. RIDERSHIP

Some of the most striking and compelling data in the DEIR are the projected ridership numbers. The DEIR's ridership projections show that Alternatives 4 and 5—directly serving UCLA—would generate exceptionally high ridership, rivaling, and in most cases, far exceeding other systems across the country. Alternative 6 performs somewhat less strongly but still surpasses Alternatives 1 and 3. While Alternative 3 would connect to UCLA Gateway Plaza, the projected ridership for 4 and 5 is 50% higher than Alternative 3's projected ridership . The DEIR indicates that Alternatives 4 and 5 would have among the highest ridership levels of any rail line in the United States. If Metro's ridership projections were to be realized, the proposed Gateway Plaza station would become the busiest non-transfer station in the entire Metro system. (*See the tables in Attachment One and Two for ridership comparisons to rail systems in various metropolitan areas, including Los Angeles.)* By contrast, Alternative 1 would have the lowest ridership (50% of Alternatives 4 and 5), rely on an impractical shuttle bus system, and worsen congestion in Westwood Village. We recommend that Alternative 1 should be eliminated from further consideration.

If the Metro Board of Directors decides to proceed with the STC project, we recommend that they select one of the high-ridership Alternatives as their Locally Preferred Alternative. In addition to its location in the center of campus, the potential future UCLA Gateway Plaza station is proximate to the Ronald Reagan UCLA Medical Center and the major UCLA medical clinic complex, and just steps away from Pauley Pavilion, a major events venue.

2. REGIONAL CONNECTIVITY

If built correctly, the STC could significantly aid efforts to complete the Metro rail network across L.A. County. By linking to the G, D, and E Lines, the STC line will fill in a major network gap, making the entire transit network more attractive to riders, and performing better overall. As an example, Metro's ridership projections show significantly higher ridership on the D Line when connecting to the STC, ranging from approximately 31,000 to 33,000 for Alternatives 4, 5 and 6**.** These figures exceed the passenger volumes on the current Metro rail lines.

3. RISKS AND RESILIENCE

A notable map in the DEIR displays wildfire footprints in the Sepulveda Pass, highlighting three wildfires over the past eight years which unfortunately are bound to occur again somewhere in the Pass. It does not seem prudent to put all mobility options, specifically the 405 and the STC line, in the same corridor, exposed to the same risks. Additionally, if the STC line includes a station on or adjacent to campus, it could play a vital role with any emergency evacuation of the 20,000+ students living on campus and in

adjacent campus housing, and the thousands of others who live in private housing in neighborhoods adjacent to the campus.

4. CONSTRUCTION IMPACTS

We understand that a project of this scale will bring unavoidable construction impacts to UCLA. Given the university's role as a leading educational, research, and medical institution, it is essential that any STC construction near or on campus be managed in a way that safeguards our operations and minimizes disruption to the nearly 90,000 students, employees, patients, and visitors who come to UCLA each day. Our main concerns are as follows.

- **Traffic** – the campus and the Westwood community have experienced firsthand the significant traffic delays associated with the construction of the D Line station. These delays don't just frustrate commuters, but they also impact emergency vehicles transporting patients to the Ronald Reagan Medical Center Emergency Room. Impacts to traffic are particularly concerning during times of heightened activity on campus, such as major events at Pauley Pavilion and other facilities, as well as during student move-in/out, finals, and graduation. Some of these large events will require a pause in construction activity, such as the annual spring commencement weekend.

  Additionally, there will be impacts related to the truck haul routes that will carry daily construction-related truck traffic for the length of the project—years of impacts—and it is critical that Metro and their contractors coordinate with UCLA to mitigate and minimalize day-to-day truck and equipment traffic impacts.

  Moving the station out of Gateway Plaza to the perimeter of the campus could help reduce these operational disruptions. Alternatives 3, 4, & 5 are proposed as a single-bore tunnel, which might enable the station platforms and facilities to be built using the tunnel as access, significantly reducing the surface disruption and traffic impacts.

- **Construction Laydown and Staging Area Management** – UCLA's main campus is only 419 acres, and very densely developed, with more than 20,000,000 square feet of built space and a campus population approaching 90,000 people. Therefore, any use of land at UCLA for non-campus related purposes brings costs and constraints. The construction of an underground rail station on campus, plus the rail line and tunnel, will require a construction laydown area proximate to the future station's footprint. For the UCLA Gateway Plaza station, several options have been suggested by both the P3 teams and Metro itself. It is not clear that a reasonable laydown area can be identified on the campus without causing significant operational disruptions.

  This concern is particularly true for Alternative 6, which if built as the proposed dual bore tunnel design, would include a lengthy (upwards of 800' in length) trench as part of the station construction process. An 800' trench would extend well past the northern edge of Gateway Plaza and, on the south side, would come perilously close to the Ronald Reagan Medical Center.

- **Research, Education and Medical Services Continuity** – Significant research and medical procedures utilizing sensitive equipment occur on the UCLA campus every day. If an STC station were to be constructed on campus, it would have to be done in a manner that ensures the integrity and capability of the University's research, medical, and teaching functions. Metro must make every reasonable effort to mitigate construction impacts, such as noise and vibration. Beyond this, to the greatest extent possible, the construction schedule should be coordinated with the UCLA academic calendar. This is especially important during periods of intense academic activity, notably "finals week" during each academic quarter and during special and important events, such as UCLA commencement weekend.

  UCLA's campus includes many buildings that contain vibration-sensitive equipment, and some of these buildings are within a short distance (up to 300') of the proposed rail alignments, generally underneath Westwood Plaza. The equipment is a mix of medical, engineering, and other extremely sensitive types of sensors. Given the proximity of the alignments, UCLA conducted a vibration sensitive equipment survey of its research and medical labs in mid-2023 and identified several dozen pieces of either vibration or electromagnetic interference sensitive equipment, including some which reach the VC-E level of vibration criteria, and which include items such as a low-temperature ultrahigh vacuum scanning probe microscope, numerous scanning electron microscopes, MRI scanners, and an electron beam lithography device (which may require NIST-A criterion), among many others. These survey results were provided to Metro in summer 2023. While the DEIR notes in its Noise and Vibration section that Westwood Plaza and Gateway Plaza identified in the report as parts of Impact Area 7, include nine Category 1 medical and research buildings, it also notes that these buildings would be exposed to ground-borne vibration and ground-borne noise that exceed FTA criteria.

  Given this, and the array of sensitive equipment in that part of campus, UCLA requests additional analysis and design scrutiny of train operations through the campus to ensure the best possible combination of resilient track supports and/or quieter train sets so that VC-E can be maintained. Metro did this for the D Line Section 3 Extension by commissioning the Noise and Vibration Study, published in August 2011. The Study supplemented the results of the project's initial Noise and Vibration Technical Report, and its purpose was to "further analyze those locations where refinements in the design, operations, or alignments were made; where vibration impacts were predicted using the previous analysis; and in response to comments and concerns by the public." It is critical that the STC's operation does not impede or impact research or medical care activities on campus.

  Regarding construction-related noise and vibration impacts, there are two areas of significant interest and concern for the campus: the Ronald Reagan Medical Center, which includes a Level 1 Trauma Center, and the Meyer and Renee Luskin Conference Center and Hotel adjacent to Gateway Plaza. The Reagan Hospital is located on Westwood Plaza, approximately a 600'distance from Gateway Plaza and directly adjacent to four of the five alternative alignments. Additionally, potential construction laydown Site S-3 is both directly adjacent to the UCLA campus and proximate to the Tiverton House, a small guest house used for UCLA Health patients' families. If Site S-3 is utilized for construction laydown, the contractor must ensure that the noise and vibration generated are not overly burdensome to the Tiverton House guests.

- **Luskin Conference Center and Hotel Construction Impact Mitigation –** Directly adjacent to Gateway Plaza is UCLA's Meyer and Renee Luskin Conference Center and Hotel (LCC). The facility is an important hub for conferences and other events. The hotel has 254 rooms, many of which overlook the adjacent Plaza and the potential future station construction site. The lengthy construction period will significantly impact accessibility to the facility and customers' desire to stay at the hotel. Therefore, it is imperative that Metro work with UCLA to ensure that the project impact will be mitigated as much as is reasonable to ensure the continued functioning of the LCC and that the project incurs the minimum impact that is reasonably possible regarding noise, dust, vibration, structural impacts, utility interruptions, and environmental concerns (such as site-specific hazards like the use of chemicals and fuel for construction-related heavy machinery).

  LCC is operated by UCLA's Housing and Hospitality Services (HHS) Department, which is a self-supporting auxiliary, meaning all of its revenue comes from its sales and service activities. Because HHS Department revenue is partly dependent on the LCC, operational constraints should be limited, and if, for example, guests are unable to conveniently access the property or noise impacts are significant, unavoidable, and extreme enough to disrupt guests, the project should compensate the UCLA HHS Department for lost room and/or event sales for the duration of the significant impact, or make improvements to reduce the impact to a level of non-significance.

- **Complications with use of Gateway Plaza** – After reviewing the DEIR and understanding the full potential impact of an STC station at Gateway Plaza, both during construction and operations, the campus has concerns as to whether this is the best campus location for a station. It might be the most optimal location for riders as it is in the center of campus, but because it is the center of campus, the construction impacts will be substantial, as will certain operational impacts once the STC station is complete.

  In 2025, more than 400 public transit buses per weekday serve the UCLA campus. Gateway Plaza is a primary transit stop and designated transit hub. These bus lines include Big Blue Bus Routes 12 and 18; BruinBus Routes U1, U5, and in the summer, U901; Culver CityBus Routes 6 and 6R; and Long Beach Transit Route 405. Additionally, many tour buses and school buses use the Plaza for pick-up and drop-off. Because this Plaza is the central transit hub on campus, it will be critical for Metro to ensure appropriate mitigation of the construction impacts upon bus operations on campus. UCLA requests that if a rail station is constructed in Gateway Plaza, Metro allocates funding to assist with upgrading alternative location(s) which will be suitable to manage the daily bus traffic that travels to campus.

  If the STC project is to proceed, we suggest Metro consider a less disruptive but similarly beneficial station location, such as near the Gayley and Strathmore intersection.

- **Parking Lot 36 Impacts of Alternative 3 --** Alternative 3 includes an underground monorail station on UCLA's Parking Lot 36, located just north of Wilshire Boulevard adjacent to Veteran Avenue. Alternative 3's underground footprint on the parking lot would consume a significant portion of the last relatively large undeveloped space that UCLA owns, and while it is likely that

future development or additions of built space can still occur, construction costs would be increased by the need to skirt around the monorail's underground station footprint. UCLA requests that Metro work with UCLA to minimize the reduction in development capacity of the site should Alternative 3 be selected.

Further, the location is coincidentally also a transit hub, much like Gateway Plaza, with several different public transit agencies providing bus routes and stops on Kinross Avenue next to the site—and by 2027, in the lot itself—which will be impacted by the station's construction for several years, at a minimum. This will require additional coordination and mitigation to ensure the transit service can continue serving its customer base.

5. OTHER CONSIDERATIONS

- **Campus Safety and Security** – UCLA has a long history of supporting public transportation use by our constituents and the greater Los Angeles community. Ensuring robust safety and security protocols for those utilizing public transit as well as the areas adjacent to public transit facilities is paramount. This concern is both for the construction period and for the long-term operation of the STC line. Recent experience on Metro's rail network suggests that larger societal issues with vagrancy, on-transit assaults, and the security of the areas surrounding rail stations must be addressed. It is critical that Metro develop and execute effective site-specific construction and operational safety plans which take into consideration the unique needs of the campus community. For the long term, Metro must address potential public safety impacts from related STC activities at Gateway Plaza, in Parking Lot 36, and adjacent areas. This effort should include building a strong relationship with UCLA's Office of Campus and Community Safety and integrating their input into all safety measures.

- **Stakeholder Communication and Transparency –** Because UCLA has a diverse array of stakeholders with varying concerns and information needs, and because the large, complex, and lengthy STC project can potentially disrupt campus life and activities, it is important for Metro and its project team to maintain a steady flow of information to the campus community. This will allow people to plan for detours or closures, helping to maintain goodwill. Additionally, frequent communication and collaboration with UCLA during the construction period can help minimize operational impacts. UCLA urges Metro to ensure robust communication between the project team and University stakeholders.

- **Long-Term Environmental and Community Impacts –** The high-water table in Westwood presents challenges to the built environment, both on campus and in Westwood Village. It is imperative that the construction impact of the tunnel and stations (UCLA Gateway Plaza and Wilshire Boulevard) include, at a minimum, implementation of low-impact development practices, such as bioswales and other pervious vegetated surfaces. Air quality impacts during construction is also a concern. UCLA appreciates Metro's commitment to utilize as many zero-emission hauling vehicles as possible, and requests that if a UCLA Gateway Plaza station is constructed, there is an effort to maximize the percentage of those vehicles on and around UCLA. We also have concerns about the potential for fugitive dust produced by construction activities at Gateway Plaza and the Wilshire Blvd stations. UCLA expects Metro's project team to

ensure full compliance with all regulations and a willingness to expand mitigation as needed, depending upon local conditions and weather.

Consistent with UCLA's commitment to sustainability efforts, each Alternative is estimated to have a net reduction in greenhouse gas emissions and carbon, compared to the no-build Alternative. According to the DEIR, Alternatives 4 and 5 provide the highest reductions, while Alternatives 1 and 3 provide the lowest, about half of Alternative 4, which scores the highest reductions. Estimates for Alternative 6 are similar to Alternatives 4 and 5, but lower.

- **Coordination with Campus Projects and Continuity of UCLA's Built Environment –** Given that the rail project's anticipated construction time spans more than five years, it is possible that the University will undertake construction or major rehabilitation of one or more buildings on campus within that same period. It will be critical for Metro to coordinate activities with UCLA across the construction period to reduce conflicts and compound construction impacts. Regarding station aesthetics and design, UCLA requests that any station or plaza accoutrements on campus be built to match UCLA's architectural style and color palette, much the way that the Parking Lot 36 D Line station and plaza will be built.

  Equity and Accessibility Requirements – While the designs for the five Alternatives will seemingly meet federal and state accessibility requirements, careful monitoring will still be required during the long construction period. Each pedestrian detour and each impediment created by construction on campus will impact a significant number of pedestrians and mobility-challenged campus community members and visitors. Particularly for Gateway Plaza, located in the physical center of the UCLA campus and in proximity to Pauley Pavilion, it will be important for the project team and its contractors to be thoughtful about how they plan and manage pathway detours in the station construction areas.

CONCLUSION

UCLA appreciates the opportunity to provide feedback on the Draft Environmental Impact Report. Our comments in this response to the DEIR align with our overarching guiding principle as stated in previous comment letters:

> *Investing resources in a project as significant as the Sepulveda Transit Corridor must result in a system that enhances equity by transporting people directly to the places they need to go and that connects as seamlessly as possible with the existing rapid transit network, and does this while minimizing the impacts of operations on the neighborhoods through which it runs.*

In summary, if Metro elects to build the STC line, we urge the board to consider the following recommendations:

- **Alternative 1 should be eliminated from further consideration.** It provides the weakest connectivity, lacks a station on or adjacent to UCLA, would result in the longest travel times to campus, has the lowest environmental benefits, and would worsen the existing congestion in Westwood Village through reliance on large volumes of shuttle buses.

- **Alternative 6 should not advance in its current form.** Although Alternative 6 offers faster travel times to UCLA from the San Fernando Valley than the other Alternatives, it is the most expensive, would result in lower ridership than Alternatives 4 and 5, and would have the most significant construction impact to the UCLA campus. If Alternative 6 is to be considered further, it should be revised to a single-bore tunnel, which would reduce campus disruption.

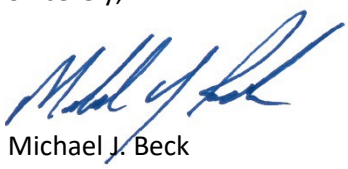
- **Ridership should be a primary consideration.** Serving the greatest number of people should be a principal factor in determining the Locally Preferred Alternative. The estimates speak for themselves. Alternatives with the greatest ridership numbers will move the most people out of their cars, provide the greatest connectivity, and have the best long-term environmental impact.

- **Consider an alternative portal location.** UCLA Gateway Plaza is the most central campus location for riders, but building and operating a rail station at this location would be excessively disruptive to campus operations, including the hospital, Luskin Conference Center, Engineering and medical research facilities, Pauley Pavilion, and primary campus parking facilities. We recommend Metro consider shifting the rail station west near the Strathmore and Gayley intersection, or another location that provides similar rider convenience to campus with less disruption to campus operations.

- **Station Mitigations.** Any station on or adjacent to UCLA must include robust mitigation for traffic, emergency access, noise and vibration, campus safety, and continuity of medical and academic operations.

The STC project presents an excellent opportunity to improve the quality of life for residents of Southern California. Should Metro move forward with this important project, we urge the Metro Board of Directors to select a Locally Preferred Alternative that includes a station on or adjacent to UCLA, a seamless connection to the Purple/D Line Wilshire station, and prioritizes potential ridership. If the project is to be built, it must work for all of Los Angeles and effectively connect our communities.

Sincerely,



Michael J. Beck
Administrative Vice Chancellor

Attachments:

Attachment 1: L.A. Metro Rail System and Lines Ridership Tables
Attachment 2: U.S. Rail Systems Ridership Table

Attachment One: L.A. Metro Rail System and Lines Ridership Tables

(DATA FOR EXISTING LINES ARE CIRCA Q1 2025)

Where Do the STC Alternatives Rank in **Daily Passenger Counts** for Metro Rail Lines?

Rank	Line	Details	Daily Passenger Counts
1	Sepulveda Transit Corridor	Alternative 5	123,551
2	Sepulveda Transit Corridor	Alternative 4	122,775
3	Sepulveda Transit Corridor	Alternative 6	107,092
4	Sepulveda Transit Corridor	Alternative 3	81,842
5	L.A. Metro Rail D Line	Reported as part of the B Line (Q1 2025)	
6	L.A. Metro Rail B Line	PKA Red Line	63,951
7	L.A. Metro Rail A Line	PKA Blue Line	63,902
8	Sepulveda Transit Corridor	Alternative 1	62,590
9	L.A. Metro Rail E Line	PKA Expo Line	47,049
10	L.A. Metro Rail C Line	PKA Green Line	18,876
11	L.A. Metro Rail K Line	PKA Crenshaw Line	5,753

By STC Alternative, Impact on **Total L.A. Metro Rail System** Daily Passengers Count:

Rank	Alternative	Daily Passenger Counts
1	With Alternative 5, daily passengers =	323,083
2	With Alternative 4, daily passengers =	322,307
3	With Alternative 6, daily passengers =	306,624
4	With Alternative 3, daily passengers =	281,374
5	With Alternative 1, daily passengers =	261,122

Attachment Two: U.S. Rail Systems Ridership

Average weekday passenger counts for major heavy rail **subway systems** and **light rail systems** in American cities based on the most recent available data for Q1 2025:

Rank	Rail System/Line	Daily Passengers
1	New York City Subway (NYCTA)	3,700,000 daily passengers on 28 rail lines The 7 Train has the highest daily ridership
2	Washington Metro (WMATA)	559,400 daily passengers across six rail lines Red Line has the highest daily ridership
3	Chicago "L" (CTA)	360,100 daily passengers on eight rail lines Red Line has 108,303 daily passengers
4	MBTA Subway	291,400 daily passengers Green Line has 95,300 daily passengers
5	SEPTA Metro	219,000 daily passengers (Philadelphia, L, B, M lines)
6	Metro Rail (Los Angeles)	199,800 daily passengers
7	PATH (Manhattan, Hudson County, Newark)	197,300 daily passengers
8	Bay Area Rapid Transit (BART)	167,700 daily passengers (Across six rail lines)
9	Sepulveda Transit Corridor – Alternative 5	123,551 daily passengers
10	Sepulveda Transit Corridor – Alternative 4	122,775 daily passengers
11	San Diego Trolley System	122,000 daily passengers
12	Sepulveda Transit Corridor – Alternative 6	107,092 daily passengers
13	Seattle Link Light Rail	100,000 daily passengers Line 1 has 82,000 daily passengers
14	MARTA Rail (Atlanta)	87,100 daily passengers (Across four rail lines)
15	Sepulveda Transit Corridor – Alternative 3	81,842 daily passengers
16	MAX Light Rail Portland	63,500 daily passengers
17	DART Light Rail Dallas	63,400 daily passengers

18	Sepulveda Transit Corridor – Alternative 1	61,590 daily passengers
19	Metrorail (Miami)	53,200 daily passengers
20	TRAX (SLC)	42,900 daily passengers
21	Denver RTD	37,800 daily passengers