



CITY OF
WEST HOLLYWOOD

CITY HALL
8300 SANTA MONICA BLVD.
WEST HOLLYWOOD, CA
90069-6216
TEL: (323) 848-6475

September 19, 2024

VIA E-MAIL

Mr. Roger Martin, Project Manager
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop 99-22-6
Los Angeles, CA 90012-2952

Re: City of West Hollywood Comments on Metro K Line Northern Extension Draft Environmental Impact Report

Dear Mr. Martin,

Thank you for the opportunity to review Metro’s Draft Environmental Impact Report (DEIR) for the K Line Northern Extension. West Hollywood residents voted for all three Metro ballot measures at among the highest levels in the County and delivering on the promise of Metro Rail connectivity has long been among the City’s top priorities. We look forward to continued partnership with Metro, the City of Los Angeles, and the County of Los Angeles as we work to get this transformative project shovel-ready and eligible for funding and financing. As you know, K Line North is a uniquely competitive project that will connect four existing Metro rail lines in the heart of the region, leverage Metro’s existing transit investments, and generate the highest ridership of any light rail project in the United States. We are encouraged that Metro’s Draft CEQA environmental review is nearly complete, and that Metro’s public hearings and community meetings have been well attended. As you prepare to start on the next phase of your analysis, we would like to share a few considerations that we hope will inform a thorough final EIR:

- 1. Based on the information available to date, the City of West Hollywood’s preferred route remains the San Vicente- Fairfax Alternative.** Of the three routes under consideration, the San Vicente-Fairfax route would serve more residents and businesses as well as more regional destinations and job centers in Central Los Angeles and West Hollywood. The San Vicente-Fairfax route has seen overwhelming public support throughout Metro’s project development process and remains the best chance of uniting the region around a single, locally preferred alternative. Longstanding support for this alignment and efforts to generate funding to accelerate its construction through a potential Enhanced Infrastructure Financing District (EIFD) could also facilitate getting this project built in our lifetimes.
- 2. During Metro’s public comment period, the City of West Hollywood conducted extensive outreach to our residents, businesses, and stakeholders, as well as those of surrounding communities along the K Line North corridor, to ensure that the community was aware of Metro’s process and how to provide public comment.** These activities, coordinated through the West Hollywood Advocates for Metro Rail (WHAM)

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DEPARTMENT**

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and All on Board Coalition advocacy groups, included tabling at community events, door-to-door outreach to businesses, City public service announcements through SMS text messaging and at electronic displays at City bus shelters and City facilities, social media posts, e-blasts, announcements at City advisory board and commission meetings, flyers distributed across all City facilities, and presentations at community and stakeholder group meetings. As part of that process, constituents were encouraged to submit comments directly to Metro, attend Metro public hearings, or submit comments via email or an online form developed to facilitate the rapid collection of similar comments. **In addition to the comments submitted directly to Metro, an additional over 600 public comments were submitted through the online comment form.** While the vast majority of these comments support the San Vicente-Fairfax alternative, a variety of other preferences and considerations are also included. **The verbatim public comments received through these channels are included at [this Dropbox link](#) for Metro's review.**

3. It has come to our attention that there may be a misunderstanding regarding the City's position on the potential need to relocate the West Hollywood Sheriff Station to facilitate Metro rail construction. **The City of West Hollywood is not opposed to exploring the temporary or permanent relocation of the Sheriff Station if needed for K Line North construction.** We look forward to working with our partners at Metro and Los Angeles County, including the Los Angeles County Sheriff's Department, to find an acceptable solution and the City remains open to assisting however we can.
4. The City retained UltraSystems Environmental Inc. to conduct a peer review of the DEIR for the K Line Northern Extension on behalf of the City. UltraSystems identified minor issues in the Paleontological Resources, Cultural Resources, Biological Resources, and Transportation sections of the DEIR as well as the associated Transportation Technical Study. Most of their findings relate to typical CEQA best practices, consistency within the DEIR, and relatively minor technical issues and requests for clarifications rather than issues pertaining to the City's primary interests with the project. However, **we are enclosing a letter from UltraSystems Environmental Inc. to the City summarizing the findings of their peer review as a courtesy to Metro in the hopes that the Final EIR can be made as defensible as possible with the benefit of these third-party comments.**
5. One issue raised by the UltraSystems peer review that does relate to the City's primary interests is a potential discrepancy between ridership estimates (which differ substantially between the La Brea and San Vicente-Fairfax alternatives) and VMT reduction estimates (which are virtually identical between these alternatives). While we understand that VMT generation/reduction is not necessarily proportional to ridership, we agree that **Metro should provide a concise but factual explanation of how VMT reduction and ridership were estimated to explain the seeming discrepancy and demonstrate whether reconciliation of the apparent discrepancy will affect the conclusions in the EIR.**



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6. In the City's scoping comment letter dated May, 24, 2021, the City asked Metro to consider the potential for local, mid-day, off-peak, late-night, healthcare, recreation, special event and concert, and tourism trips which are uniquely relevant to K Line North, but not typically well estimated by Metro's ridership modeling. We understand that Metro's Federal Transit Administration (FTA)-approved ridership model must be used for official ridership estimates, but **can Metro share any supplemental modeling that was done to estimate these additional trip types? If none has been performed to date, can this be incorporated into future workplans?**

7. **Metro's future first/last mile (FLM) work should incorporate findings from the City's soon to be completed Rail Integration Study** which will include developing first/last mile (FLM) recommendations to maximize the reach of future transit stations in and around West Hollywood, studying the potential to implement small business protection and anti-displacement mechanisms, and compiling a range of other data and analysis relevant to Metro's analysis and the K Line North project. To that end, it would be helpful to understand what Metro will be producing related to FLM and when that work is anticipated to occur.

We look forward to expanding our partnership with Metro, the City of Los Angeles, and the County of Los Angeles as we work towards a project that meets all of our needs and develop an implementable funding package to realize that vision. Thank you for your consideration and careful evaluation of our comments. Please keep us informed of project milestones and study outcomes and let us know if we can be of assistance along the way.

Sincerely,

DocuSigned by:

Nicholas P. Maricich

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Nicholas P. Maricich

Director of Community Development

Enclosures

UltraSystems Environmental Inc. Peer Review of Metro DEIR Summary Letter
(September 12, 2024)
City of West Hollywood Scoping Comment Letter (May 24, 2021)