



August 28, 2025

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Re: Comments on Draft Environmental Impact Report (DEIR) for the Los Angeles County Metropolitan Transportation Authority (Metro) Sepulveda Transit Corridor Project (Project).

To whom it may concern,

The Bel Air Beverly Crest Neighborhood Council (“BABCNC”) appreciates the opportunity to comment on the Sepulveda Transit Corridor Project (“Project”) Draft EIR. We are a governmental body created by the City of Los Angeles City Charter to advocate for its neighborhoods on important public issues. This Project could not have more relevance to our mission.

We represent the roughly 25,000 Angelenos that live, do business, and own property between the 405 freeway and Laurel Canyon, reaching from Mulholland to Sunset. Our Board is comprised of publicly elected representatives, members selected by longstanding neighborhood associations and other stakeholder groups.

To best understand and advocate for the interests of our community, our Board formed an ad-hoc committee that has met five times and conducted direct outreach in our community to

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STAKEHOLDER GROUPS

Bel Air Association
Bel-Air Crest Master Association
Bel Air Hills Association
Bel Air Ridge Association
Benedict Canyon Association
Casiano Estates Association
Doheny-Sunset Plaza Neighborhood Assn.
Holmby Hills Homeowners Association
Laurel Canyon Association
Residents of Beverly Glen

RESIDENTIAL DISTRICTS

Bel Air Glen District
Franklin-Coldwater District
North of Sunset District
NON-RESIDENTIAL REPRESENTATION
At-Large Members
Commercial or Office Enterprise Districts
Custodians of Open Space
Faith-Based Institutions
Public Schools
Private Schools K–6 and 7–12

solicit input from qualified experts, comments from the community, and ultimately to craft this letter to share the input we received and our board's resulting conclusions.

Any of the proposed routes will need to physically cross through our district. And as such, any of the proposed routes will have unavoidable, direct and indirect impacts on the communities we represent. In addition, because of the almost entirely car-dependent nature of our community's geography and lack of any meaningful mass transit, our constituents are unlikely to be heavy users of public transit. We are uniquely impacted by the construction and operation of this system regardless of which project alternative is chosen. And so, our community wants assurances that our concerns noted below have effective, specific mitigation plans in place and for those plans to be communicated to our Board in a manner easily disseminated and understood by the general public.

I. Input from Neighborhood Representatives of the BABCNC

The neighborhoods comprising the BABCNC are all impacted in some way by both construction and operation of the Project, differing primarily by geographic location, and summarized as follows:

- **Bel-Air Association:** Any alternative requiring tunneling under Bel-Air is vehemently opposed by the Bel-Air Association. Any amount of noise or vibration due to either the construction or operation of such a route under Bel-Air is unacceptable. Concerned about the lack of financing for the Project, especially any alternative that requires tunneling. Also concerned that Bel-Air is in a liquefaction zone, particularly parts of lower Bel-Air that will be impacted by Alternative 5 where the tunnel as described will be only 50 feet underground as it rises up to UCLA. Bel-Air is also concerned about evacuation - specifically, how people would evacuate from the tunnels in the event of an emergency. Finally, Bel-Air is concerned about the fact that there are existing earthquake faults in the area.
- **Bel Air Crest:** Concern was raised specifically about impacts of construction activity along the 405 freeway because of additional noise. Concerned about the impacts on Sepulveda during construction that will impede ingress and egress into Bel Air Crest. Sepulveda is the primary means to access this neighborhood. It is also an emergency exit for those communities that are on Casiano Road and in Casiano. If there is a fire or other emergency, these persons need to use Sepulveda to exit. There are also important educational institutions that use Sepulveda as well. Concerned that any monorail option will create visual blight in an area that is supposed to be a scenic corridor. Also concerned that any sound walls will be ineffective due to unique Canyon acoustics and topography. Also concerned about a decrease in home values to vibration and noise by

Project. Also concerned about the creation of an additional transit element in a Very High Fire Hazard Severity Zone (“VHFHSZ”), introducing new people into a potentially dangerous environment and exacerbating the risk to those that already live there. Also concerned about narrowing of lanes on 405 freeway, which is already an accident prone environment. Research has documented that reduction of lane width is associated with increased traffic accidents. Also concerned about the elimination of shoulders on the 405 freeway. Also concerned that if there is a stop at the Getty, there will be no public parking precluding residents in the area from utilizing this proposed Project.

- Upper Bel Air/Bel Air Hills Association: Concerns were raised related to potential visual impacts from Alternative 6 and potential noise impacts from monorail alternatives on western side. Their representative also expressed concerns about the extensive existing cut-through traffic, the problems this traffic creates with respect to emergency response and evacuation during times of emergencies, and the impacts of doing nothing. Also concerned about the narrowing of traffic lanes on the 405 freeway for the monorail alternative causing accidents resulting in spillover traffic into the neighborhood.
- Beverly Glen (Residents of Beverly Glen, Bel Air Ridge, Bel Air Glen): It was noted that Alternative 6 goes 250 feet under Beverly Glen canyon which raises concerns regarding construction and operational impacts. All communities are currently affected by cross-mountain commuting traffic. Also, there is a concern regarding new accessory structures being placed in open space as part of Alternative 6.
- Benedict Canyon: Concern for traffic impacts during construction. Concerned about haul trucks using Canyon roads.
- Coldwater Canyon: Concern for traffic impact during construction.
- Laurel Canyon: Generalized concerns about lack of financing for the Project.
- Mulholland Corridor: Concern for traffic impact during construction. Concerns that hauling required for Project and diversion of traffic from the 405 will impede major fire responses from Mulholland and the multiple fire stations situated thereon.

II. Presentations from Stakeholders & Public Comment

Our committee heard from representatives from the Getty Center, Bel-Air Association/Keep Bel-Air Beautiful, a mobility planner from UCLA, and expert geotechnical engineer, and members of the public. The BABCNC Planning and Land Use Committee also held a Special Meeting where a representative from the Sherman Oaks Homeowners

Association, Bob Anderson, spoke and gave a presentation on Project Alternatives and other related issues. These presentations, comments, and the ensuing discussions provided the context and basis for the content of this letter. Please see Attachment A for a detailed summary of these meetings.

III. Consensus Opinions

Based on the input and discussion provided in our committee's meetings, the following issues were identified as concerns of general consensus.

A. Poor Outreach by Metro

We found a disappointing, yet unfortunately expected lack of knowledge in the general community regarding the Project. The contents of the DEIR - particularly the potential impacts to our community, what alternative routes have been proposed, and the mere fact that this major infrastructure project is under consideration is not widely known by residents of our neighborhoods. Metro may have met the legal requirements for public outreach but has not been truly effective in its communication. Even if the public had significant awareness of the aforementioned issues, the public comment period is unreasonably short relative to the length and complexity of the DEIR. The public could not reasonably be expected to read and interpret roughly 2,500 pages of technical reports in 90 days - especially for a Project of this scope and magnitude.

B. Canyon Traffic Impact

Traffic on canyons and other roads frequented by commuters in an attempt to avoid 405 freeway traffic (specifically Sepulveda, Roscomare, Beverly Glen, Benedict Canyon, and Coldwater Canyon) is a current persistent and real burden on our communities. We are concerned that construction of the Sepulveda Transit Corridor ("STC") Project will potentially add to the distressing traffic condition in our canyon roads, as well as further exacerbate the issues of general accessibility, emergency ingress and egress in case of emergency, road safety, and general negative impacts that constant heavy traffic has on our quality of life.

The means of mitigating these concerns are unclear to us. At a minimum, mitigation of commuter traffic impacts on canyon roads during construction is critically important, especially considering the prospect of an extended construction timeline.

Given that the entirety of our community is in a VHFHSZ, our ability to safely evacuate in the event of a wildfire is of paramount importance to us. We are concerned that any increase in traffic will exacerbate the existing challenges related to emergency response and evacuation (not to mention everyday emergencies).

The risks and burdens imposed by the current levels of traffic in our canyons is unacceptable and is getting worse. A solution is required.

C. Zoning and Density Impact

Both existing and proposed legislation, including, but not limited to, Senate Bill 79, allows for ministerial approval of dense housing projects, including multi-family developments in areas zoned for single family housing around major transit hubs such as those proposed via this Project. Importantly, this dramatic rezoning tied to the creation of major transit stops currently does not exempt VHFHSZs. This increased population density in risk prone areas (often coupled with elimination of parking requirements) creates significant risk to human life. We believe this is an obviously dangerous oversight.

While we understand this aspect is not within Metro's control, Metro is required to evaluate the reasonably foreseeable environmental consequences that flow from the creation of Major Transit Stops within VHFHSZs. These stops open the door to the construction of dense development projects that would otherwise not be allowed under local zoning law. This is an extremely serious threat to the safety of people that live in fire prone areas like ours and must be accounted for in Metro's decision making. Metro has undertaken zero analysis of this particular issue in the DEIR. Because of this fatal flaw, the DEIR must be revised and recirculated.

We have only to look at the Pacific Palisades Fire just this year to see the disastrous result of trying to evacuate too many people through limited access routes in a similar fire zone.

D. Parking at Planned Stations

There is inadequate planned parking at proposed stations. Without sufficient parking, chances of any significant portion of our community actually using the STC is slim to none. At least one of the alternatives (Alternative 3) has a station planned in the middle of the Santa Monica Mountains and yet has no planned parking whatsoever. This is a huge missed opportunity. By not providing adequate parking, Metro ensures inequity of access to a community that is particularly impacted by its construction and operation.

E. Construction Budget & Timeline

Significant concerns were raised from multiple sources that financing for the Project has not been sufficiently identified, questioning the ultimate feasibility of completing the Project within the Project budget and in a timely manner, or at all. Other testimony pointed to the fact that other comparable projects have not secured complete funding in advance.

Given that we have experienced a period of significant inflation in recent years (which continues to persist), particularly impacting construction materials and labor, we are skeptical that the financial assumptions Metro is basing its projections on will prove to be accurate.

Running over budget and behind schedule is not uncommon for large infrastructure projects such as this. The lack of secured funding is of concern to all of us as taxpayers, and the potential for an extended construction period particularly affects communities like ours that would be immediately and disproportionately impacted if the Project is not completed as designed in a reasonable timeframe.

Federal funding, which is typically relied on for such projects, is highly questionable at this time given recent actions taken and policies proposed by the federal government. The public-private partnership model proposed to address some of the financing is not well defined.

We believe that the Metro Board should take these financial feasibility issues into serious consideration in evaluating the Project.

F. Tunneling Issues (Eminent Domain & The Stone Canyon Reservoir)

While our community would not appear to be directly impacted by traditional eminent domain issues, many of our constituents have expressed two primary concerns where tunneling under private property could result in a taking of real property rights.

The first concern is regarding disruption to the enjoyment of private property due to sound and vibration during construction and operation, particularly in sections of proposed routes where the tunnel is close to the surface.

The second is a need to be assured that the chosen Project alternative's route will not negatively impact the integrity of structural elements of homes or the surrounding geology due to tunneling, including caissons or disrupting liquefaction zones in Lower Bel Air or Beverly Glen.

It is known that there are many homes in Lower Bel Air that have caissons equal or greater to the proposed depth of the tunnels in that area. If in the unfortunate event that a tunnel is on a collision course with a home's caissons, we are concerned about the taking of said property. It is not clear what mitigation measures would be taken to deal with these issues so as to not result in unbuildable lots, a complete taking of property (not just subterranean rights), or schedule and budget escalations.

Separately, Lower Bel Air needs assurances that thorough measures have been taken to ensure the ongoing stability of the Stone Canyon Reservoir dam. Any destabilization or negative

impacts to the structural integrity of the dam would have extremely dangerous consequences. Although we cannot speak for them, this concern would logically be shared by UCLA and LADWP.

IV. Conclusion

The DEIR does not serve its intended purpose as an informational document for the public at large. Many questions remain regarding the environmental impacts of the Project. We feel that recirculation of the DEIR is required after the environmental impacts have been fully evaluated and disclosed in a manner that can be reasonably digested and understood by the public in a reasonable amount of time.

As it stands, our community needs more consideration and specific mitigation measures related to traffic, operational noise, aesthetic impacts, potential zoning and density impacts, parking at stations, eminent domain, concerns for tunneling under homes, and a realistic expectation of the Project's construction budget and timeline.

Sincerely,

Dr. Travis Longcore
President
Bel-Air Beverly Crest Neighborhood Council

Attachment A : Summary of Presentations from Stakeholders & Public Comment

Sherman Oaks Homeowners Association (Bob Anderson)

Bob Anderson of the Sherman Oaks Homeowners Association (SOHA) presented his concerns about the Sepulveda Transit Corridor Draft Environmental Impact Report (DEIR). He's been following the project since 2015 and believes the process is flawed, stating there are 10 serious flaws in the DEIR package. He noted that Metro initially considered 25 to 27 concepts before narrowing it down to six alternatives in 2022, consisting of three monorails (Alts 1, 2, and 3) and three heavy rails (Alts 4, 5, and 6). Of the monorail options, Alt 1 is completely above ground, while Alt 3 has a tunnel to provide a station on the UCLA campus. Heavy rails, like the Red and Purple lines, are limited by grade and must be subways to cross the Sepulveda Pass. Alts 4 and 5 were designed by the Bechtel consortium, while Alt 6 was designed by Metro's own environmental contractor. He voiced his opposition to Alternative 4 and stated that his group would not support any of the other four alternatives due to the problems with each.

Anderson's key concerns include financing, eminent domain, and environmental impacts. He criticized Metro for not having a clear funding plan for the project, which could cost between \$17 and \$29 billion, noting that the Measure M budget is only \$5.7 billion, escalating to \$20 billion. He also pointed out the significant eminent domain required for all alternatives, particularly for Alternative 4, which would require the removal of 9 to 11 homes. On environmental impacts, he raised concerns about noise and vibration, especially for underground sections that are not very deep. He also expressed frustration with the lack of detail on how a public-private partnership (PPP) would work and noted that Alternative 6 cannot be built under a PPP. He believes the DEIR is being used as a decision-making document rather than a tool to identify environmental impacts.

The Getty Center : Mary Elizabeth Michaels

The speaker emphasized the importance of providing transit to an important cultural center such as the Getty which would provide more people, both Los Angeles residents and tourists, the opportunity to access this resource and allow the Getty to expand programming. She explained her understanding of how a Metro stop at the Getty would work, where it would be located and the Getty's current operating considerations and emergency preparedness planning.

Committee members raised issues related to reasonable foreseeability of increased density near new major transit stops due to the mandates of SB 79 and other laws that would create a heightened fire risk in the existing Very High Fire Hazard Severity Zone. Concerns were also raised about safety and evacuation issues in general, lack of parking at the proposed stop/ first and last mile concerns, questions related to the Getty's existing Conditional Use permit that has limitations related to parking. There was further discussion regarding the availability of

funding in general for the project, impact of inflation, reliability of traditional federal resources, transparency regarding the public-private partnership financing model, and the ability to complete the project and possible phasing. Other issues of concern were identifying the scope of eminent domain that would be invoked, the Woodland impact of Alternative 4, and the possible impact of vibrations due to construction or operation on the integrity of the Stone Canyon Reservoir dam.

The Bel-Air Association / Keep Bel-Air Beautiful (Fred Rosen)

He expressed fierce opposition to the project, especially the alternative which includes tunneling under lower Bel Air. He stated that no amount of noise or vibration is acceptable and all subways/tunnels are nonstarters are the BAA. He questioned the competence of Metro to perform on time and on budget, expressed the strong belief that project is not financially feasible, that conflicts of interest exist, that there are continuing management and design issues, and that there is a lack of transparency and communication from both Metro and elected representatives, especially the lack of outreach. His group is prepared to sue and projects years of litigation that would significantly delay the project. It was his position that the existing proposals are already outdated and that a suitable outcome of the current process would be to start over, looking to future technologies.

Committee members debated these points and raised the concern that pursuing the project now is important to address the serious traffic and accessibility issues faced by the City and specifically our neighborhoods, which take the brunt of health and quality of life impacts created cars using the canyons as alternative routes to the Sepulveda corridor.

Dr. Jonathan Stewart

A professor at UCLA and geotechnical/ civil engineer with a specialization in earthquake engineering commented on the Draft EIR and responded to many technical questions. He believes that the Metro design team will have the capacity to solve earthquake, liquefaction and water issues that may be encountered and believes that EIR as to the topics he read was adequate - largely because the project must adhere to existing regulations that have been put in place.

He emphasized that the technology has improved significantly in all aspects over the years (specifically since the construction of the Red Line) and that experiences of other countries in earthquake prone areas with tunnels have not experienced major issues during significant seismic activity due to improvements in technology and design. He also spoke to how emergency situations on both above and below ground systems are planned for and mitigated. He noted that heightened engineering standards are required within 50 feet of the fault lines and also that the depth of the tunnel would affect how much of an impact would result from boring. He further

noted that if liquefaction were encountered, there would likely be mitigation in the form of improvements to the ground surface in certain areas that would help adjacent structures.

UCLA (David Karwaski, Director of Mobility Planning & Traffic Systems at UCLA Transportation).

UCLA supports any alternative that provides a stop in the middle of campus (regardless of technology) and also emphasized the importance of having a one seat ride from the Valley to UCLA noting that options with an increased travel time will have decreased ridership. UCLA has not done independent ridership studies or forecasts but cited the number of students (48,000) plus employees (40,000) that would be served in addition to others that would be able to access medical and cultural facilities via this option. As evidence of student demand, he noted that UCLA gave away 25,000 transit passes last year and that the student body has expressed strong support for the Sepulveda Transit Corridor Project with a stop in the middle of UCLA. It was noted that UCLA stop would be the second busiest stop in the Metro system (18,000) if it was in operation today; Wilshire would be the busiest stop in the Metro stop (30,000 people); Getty has just 1300 people per day forecasted.

Regarding funding issues, he was not concerned about the source of funding at this point and expressed the opinion that the federal government will likely provide money in the future (just like they did for the Purple Line/D Line).

He noted that residential communities will benefit by having traffic taken off canyon streets resulting in better air quality. Also noted was that under certain alternatives, the lanes of the 405 would be narrowed from 14 feet to 11 feet and the shoulders would be eliminated, creating a bad result for the community, however a committee member was skeptical that this would be the result of the Metro project rather than the creation of the HOV lane. The speaker did not think it was feasible to expect that eliminating the UCLA stop would enable Metro to further extend the line towards LAX earlier than now planned.