



January XX, 2022

**VIA EMAIL (sepulvedatransit@metro.net)**

Peter Carter, Project Manager  
 Metro  
 One Gateway Plaza, Mail Stop 99-22-6  
 Los Angeles, California 90012

**Re: Sepulveda Transit Corridor Project**

Dear Mr. Carter:

The Bel Air Beverly Crest Neighborhood Council serves a large, multi-community, open space, wildlife corridor area in the Santa Monica Mountains. The Council is advisory to the City of Los Angeles on issues that affect our territory. Its western border is the Sepulveda Scenic Corridor/I-405 Freeway. Its eastern border is Laurel Canyon. Its northern border is Mulholland Drive. Its southern border is Sunset Blvd. Significant segments of the proposed project routes will definitely be located within our borders. We offer these comments as a courtesy, representing the views of our Board of Directors. This letter should not, however, be interpreted as representing the position of the City of Los Angeles as a whole or a communication from the City, which is represented by the Mayor in intergovernmental relations.

The Metro Sepulveda Transit Corridor Project ("Project") area includes important canyon routes between the valley and West Los Angeles. Benedict Canyon, Beverly Glen (a secondary highway), Stone Canyon, Roscomare Road (a canyon collector street), Bellagio Road leading to Sunset Boulevard, and Sepulveda Boulevard (a secondary highway). The I-405 Freeway leads to and from WLA to the San Fernando Valley.

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**STAKEHOLDER GROUPS**

Bel Air Association  
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 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 District  
 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

Re: Sepulveda Transit Corridor Project

BABCNC concurs that the Environmental Impact Report (EIR) should address all of the topic areas listed in Appendix G of the CEQA Guidelines, as described in the Notice of Preparation (NOP). We offer additional comments on several topic areas and propose additional alternatives that should be included in the analysis.

### **Wildfire**

The BABCNC territory is within a Very High Fire Hazard Severity Zone as designated by Cal Fire. Several significant fires have swept through this area and burned tree canopies, homes, and wildlife. We take this threat with all seriousness. As part of the description of the project area and baseline conditions, please investigate all arson, electric, and spontaneous fires, especially those within the proposed project footprint within the last 5 years. You may not find all of the car fires, but the residents can testify that they happened. Fire Department records may or may not have been retained, and smaller incidents may not be documented. You have only to examine both the east and west sides of Sepulveda to find the answers related to the two larger fires. Fires have been started by faulty electrical wires, the homeless, including cooking fires and pyromaniacs. Cars fires/accidents on the freeway or on both sides of Sepulveda can cause a gas tank to explode, spewing gasoline onto hillsides and burning the hillsides in Bel Air. A full understanding of the historical and current fire risk must be included in the wildlife risk analysis, and special attention paid to any additional risk from Project construction and ongoing operations from all alternatives. We have been told by LA Fire Department officials that a wind-driven fire beginning in the Kirkwood Bowl area could reach our western border in as within 15-30 minutes. Burning embers from our tall non-native trees, such as pines, eucalyptus, and palm trees can fly great distances in a windstorm. Given our dense residential areas within our canyons, what escape routes are available for passengers on trains, in tunnels, or on aerial monorails? What escape routes are available to fire evacuees, who would have to leave their Bel Air Beverly Crest communities both during and after construction?

### **Geotechnical, Subsurface, and Seismic Hazards**

We request that Metro investigate all earthquake fault lines in the Project area, such as the fault along Mulholland Dr. from approximately Benedict Canyon and west to the I-405. We have had two recent earthquakes along that fault. We have been told by USGS that earthquake faults cannot be remediated and can reach 3 miles deep.

On several mountainsides, there has been earth slippage. A chunk of the Mulholland roadway east of Coldwater Canyon (part of the BABCNC territory) literally broke off and fell into the canyon below. The analysis should map all current and historical landslide areas and assess the impacts of construction and operation of all alternatives on them.

Our residents report that there are many springs and aquifers in the project area. Some, but not all of these have been mapped. A thorough investigation, starting with existing data (Dark et al. 2011, Liu et al. 2011) and including field inspections should be made of springs and near-surface aquifers. To assist this effort, we compiled the following examples.

1. A large, intermittent spring exists at the top of Beverly Glen and Mulholland Drive.
2. Another major spring feeds a stream on the west side of Stone Canyon Road.
3. Under several houses in Bel Air Crest, springs and/or surficial aquifers have invaded elevator shafts. Some basements had to be rebuilt. Please check for the lawsuits.
4. Milken School is across the Mulholland Bridge on Mulholland Drive. The gym had to be rebuilt 3 times because water from springs undermined the gym floor.

Fully describing the underground waters is essential to a complete impact analysis because of the potential adverse impacts of dewatering any tunnels and access shafts. Such adverse impacts would include potential geotechnical hazards, subsidence, and loss of biological function of surface ecosystems dependent on streams or surface aquifers.

How will dewatering of subsurface tunnels affect subsidence and where? How much water will be pumped out of tunnels and how will it be disposed of? How long will such dewatering take place (during construction, indefinitely)? Will clean, fresh water pumped from tunnels simply be discharged into the stormdrain system and wasted by discharging it into the ocean? Can the project design include reuse of any water pumped from tunnels to replenish existing aquifers to ensure continued ecological function of streams and riparian zones dependent on near-surface water? Where will any dewatering pumps be located and what route will any removed water take? How will dewatering affect wildlife? What do studies show about springs draining into tunnels? How will wildlife fare if traditional sources of water are no longer available on the surface?

We are certain that the Lower Stone Canyon reservoir area is prone to liquefaction, based upon data Insurance Company insurance policies issued to homeowners in the area. Some Bel Air Crest Canyon Homes are marked on maps as liquefaction locations. For example, Stone Canyon Road is on a flood plain. The Stone Canyon reservoir is not lined and is supported by an earthen dam. A second such dam was built elsewhere by the same man: William Mulholland. That dam failed/ collapsed years ago. The EIR should consider the relationship between project elements and liquefaction risk, and the impacts on any tunnel that may be close to a liquefaction zone in if an event occurs. Please confirm and identify the entirety of the liquefaction areas within our boundaries in the EIR.

Given the fate of the other Mulholland designed dam, how will tunneling affect the stability of the Stone Canyon Reservoir Dam? Will tunneling below and or around the reservoir and/or Stone Canon Creek/Stone Canyon Road destabilize the area?

Residents have concerns about the number of tunnels. The geotechnical analysis should evaluate the differential effects of one or two tunnels on stability, noise, and vibration.

### **Noise and Vibration**

Community residents are concerned about noise and vibration, both from underground and aboveground project elements. The noise analysis should include three-dimensional analysis of noise propagation from the project elements, including rail segments, tunnel vents, maintenance yards, stations, and other project elements. Such analysis should be done using software capable of mapping the influence of buildings and topography on noise propagation and not using generic assumptions about the fall-off of noise with distance. Those who live in the hillsides know that topography can exacerbate and concentrate noise and any analytical approach must be done using a fully three-dimensional noise propagation model. Differential propagation during different weather conditions should also be considered.

Effects of noise on wildlife should be considered, and such analysis must consider the frequencies of sound to which other species are sensitive and not based on human auditory sensitivity. What significant sounds/noise emit from vents, fans, electrical charging facilities, and any other ancillary equipment necessary for any proposed mode of transportation? What remedies would the team recommend, such as sound walls, to reduce noise in our neighborhoods and mountainsides?

Characterization of sound from the monorail alternatives are of interest, as are the sounds that might be emitted from any tunnel vents. All communities are concerned about the results of vibrations from underground tunnels as well. Some communities are concerned about the vibrations and sounds carrying into their communities. The EIR should describe the expected vibrations/sounds above the ground which result from aerial monorail transit.

### **Visual Quality and Aesthetics**

Many areas within the project area are designated as scenic corridors. These include the Sepulveda Pass, Beverly Glen Boulevard, and Mulholland Drive. What visual effects will the monorail option have on these scenic resources, including for the residents for Bel Air Crest.

The bridge over the entrance to Bel Air Crest is 16.5' at its highest point. Add the height of the monorail support columns and the height of the monorail on the monorail track, and the top of the monorail cars will be about 50' from the ground. Since the community of Bel Air Crest is situated uphill from its entrance, please study the visual effects inside the community and inside a monorail car. How will people be affected by monorails traveling no less than every 2 minutes in each direction both day and night?

Re: Sepulveda Transit Corridor Project

We already have a serious problem with light pollution in our mountains and on the freeway. While laws are on the books, it is difficult to trace the multiple sources of significant light. These lights negatively affect the mountain wildlife, particularly raptors and night foraging animals which are not biologically suited to hunting for prey in artificial lighting conditions. For all aboveground project elements, what is the spectral distribution and intensity of light will be emitted from trains, monorails, and associated infrastructure at night?

## **Alternatives**

We suggest the following alternatives that could achieve the project goals while reducing the environmental impacts of construction and operation.

Low/Zero Emission Bus Alternative. Given the huge cost of the proposed project and capacity of the 405 Freeway, the same money spent immediately on low/zero emission busses that connect through the Sepulveda Pass is likely to be a far more cost effective and climate-smart alternative. One project alternative should include expansion of the bus system using express lanes on the 405 instead of a rail project.

Multiple Use Tunnels. It has been suggested that tunnels could accommodate vehicles, instead of or in addition to trains. Of course the suggestion would be for separate tunnels for different vehicular use. Would a dedicated truck tunnel remove significant traffic away from our traditional roadways? What benefits could be gained from using these alternative tunnels?

Sepulveda Pass Underground Rail Alternative. The project alternatives conspicuously lack an underground alternative that uses the existing transit corridor and property under the 405 Freeway.

Sincerely,

Travis Longcore, Ph.D., President  
Bel Air-Beverly Crest Neighborhood Council  
[tlongcore@babnc.org](mailto:tlongcore@babnc.org)

Dark, S., E. D. Stein, D. Bram, J. Osuna, J. Monteferrante, T. Longcore, R. Grossinger, and E. Beller. 2011. Historical Ecology of the Ballona Creek Watershed. Southern California Coastal Water Research Project, Technical Publication No. 671, Costa Mesa, California.

Liu, S.-W. S., T. Hogue, E. D. Stein, and J. Barco. 2011. Contemporary and historical hydrologic analysis of the Ballona Creek watershed. Tech. Rep. 683, Southern California Water Research Project, Costa Mesa, California.