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April 25, 2019

The Honorable City Council  
City of Los Angeles  
City Hall, Room 395  
Los Angeles, California 90012

Dear Honorable Members:

**NEXUS STUDY ANALYSIS; CF 07-0287 CF 08-0229**

The Department of City Planning is submitting for the record, the attached supplemental analysis prepared by transportation consultant Fehr & Peers regarding the Nexus Study for the Coastal Transportation Corridor Specific Plan and West Los Angeles Transportation Improvement and Mitigation Specific Plan.

Sincerely,

VINCENT P. BERTONI, AICP  
Director of Planning

Conni Pallini-Tipton  
Senior City Planner

VPB:CPT:ro



April 25, 2019

Renata Ooms  
City Planning Associate  
Department of City Planning  
200 N. Spring St., Room 763  
Los Angeles, CA 90012

***Re: Review of the Nexus Study for the CTCSP and WLA TIMP Specific Plans***

Even though time has passed since the Nexus Study for the CTCSP and WLA TIMP Specific Plans was conducted, the findings are still applicable and there is no substantial evidence that would result in different findings than already reported. Transportation conditions on the Westside have not substantially changed nor have the anticipated levels of growth changed from those envisioned in the Nexus Study. In addition, no new studies have been conducted that provide new substantial evidence that would lead to new or different findings or contradict the findings in the Nexus Study. Therefore, there is no substantial evidence for the need for a new Nexus Study and the study is still applicable for adoption and implementation by the City.

A comment was submitted regarding declining transit ridership trends and points to a study conducted by UCLA/ITS that concludes that the major determinant in transit usage is access to a vehicle and not proximity to transit. First, the final EIR acknowledged transit ridership trends nationally and in Los Angeles. Based on a study published by Metro<sup>1</sup>, transit ridership in Los Angeles County is evolving similarly to the national trend<sup>2</sup>: Metro bus ridership has decreased, and rail ridership has increased. Since 2008, bus ridership in Los Angeles County has decreased at a rate similar to the national trend (12% in Los Angeles compared to 9% nationwide). Rail ridership has grown much more quickly in Los Angeles County than in the United States as a whole (27% in Los Angeles compared to 11% nationwide). When evaluating changing trends in transit ridership, it is important to examine multi-year periods. Transit ridership on both bus and rail fluctuates up and down from year to year, and one-year comparisons may suggest changes in ridership trends that do not bear out over a longer period. For example, ridership on the Red/Purple Line decreased from the previous year on two occasions between 2008 and 2015, but ridership on the line over the entire period increased by 9%.

Since the publication of the EIR, UCLA's Institute of Transportation Studies (ITS) published a study on falling transit ridership in Southern California and statewide for the Southern California Association of Governments (SCAG)<sup>3</sup> as referenced in the comment. The study explored a variety of factors for falling transit use and concluded that the most significant factor is the increase of motor vehicle access, particularly

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<sup>1</sup> Quality of Life Report (LA County Metropolitan Transportation Authority, 2016) [Pages 18 – 19].

<sup>2</sup> Public Transportation Ridership Report (American Public Transportation Association, 1990-2015).

<sup>3</sup> Falling Transit Ridership: California and Southern California (UCLA Institute of Transportation Studies, January 2018).

for low-income households that traditionally have been the most frequent transit users in the region. On a per capita basis, the number of transit trips has mostly declined annually since 2007 and declined consistently since 2013 in both the SCAG region and statewide. The study states that a defining attribute of regular transit riders is their relative lack of access to private vehicles, and within the SCAG region lower income households dramatically increased their vehicle ownership between 2000 and 2015. According to Census data, between 1990 and 2000, the SCAG region added 1.8 million people and 456,000 household vehicles (0.25 vehicles per new resident) in comparison to the time period between 2000 and 2015 when the region added 2.3 million people and 2.1 million household vehicles (0.95 vehicles per new resident).

While the study concludes that a significant cause of ridership decline is access to private vehicles for those previously dependent on transit, it does not state that the solution to increased transit ridership is to reduce auto-ownership levels. Rather, the study acknowledges that the extensive street and freeway networks in Los Angeles as well as free parking in many areas make driving relatively easy while moving around by modes other than driving is not. Due to the historical investment in making driving relatively easy, it is understandable why people choose to acquire cars. Therefore, the study states that transit agencies should focus on increasing ridership by convincing the vast majority of people who rarely or never use transit to begin riding occasionally instead of driving. For example, if one out of every four people who rarely or never ride transit (approximately 14.5 million (77%) of the 18.8 million people in the region) replaced one driving trip with one transit trip every two weeks then annual transit ridership would grow by 96 million and would more than offset the loss in recent years (72 million annual transit rides).

In response to ridership declines, Metro formed a Regional Ridership Improvement Task Force to prepare a Ridership Growth Action Plan<sup>4</sup>. The plan identifies innovative solutions to retain current customers, reclaim past customers, and recruit new customers. Strategies include better information for riders, more collaboration between Metro and the 16 municipal operators in the County, enhanced perceptions of safety and comfort on transit, and improved service quality. Metro is also exploring new technology solutions to increase transit ridership, such as its partnership with Via<sup>5</sup> to provide on-demand door-to-door service to three transit stations in Los Angeles (Artesia, El Monte, and North Hollywood Stations).

On the Westside, Metro's Expo Line has surpassed ridership expectations and reached Year 2030 ridership projection levels in Spring 2017 with a daily average of 64,000 boardings<sup>6</sup>. The transit improvements contained in the Project List are intended to further increase transit ridership on the Westside. The Proposed Project maintains the original intent of the CTCSP and WLA TIMP to alleviate the expected impacts of new development on the circulation system. However, acknowledging the existing physical constraints of a now fully built-out urban environment as well as recent State legislation, the Proposed Project considers other transportation impacts and benefits applicable in the assessment of a TIA fee. As described in the Nexus

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<sup>4</sup> Ridership Growth Action Plan (LA County Metropolitan Transportation Authority Regional Ridership Improvement Task Force, November 2018).

<sup>5</sup> LA Metro Launches Partnership with Via to Provide On-Demand Service to Three Busy Transit Stations (Metro news release: [https://www.metro.net/news/simple\\_pr/la-metro-launches-partnership-provide-demand-servi/](https://www.metro.net/news/simple_pr/la-metro-launches-partnership-provide-demand-servi/), January 2019).

<sup>6</sup> Expo Line Reaches 2030 Ridership Goal (Curbed Los Angeles, July 10, 2017).

Study, the updated impact fees that are a part of the Proposed Project were developed to mitigate transportation impacts as measured by VMT, rather than LOS. As described by the Governor's Office of Planning and Research, possible mitigations for VMT include improving or increasing access to transit, improving pedestrian or bicycle networks, providing traffic calming, providing bicycle parking, providing car-sharing, bike sharing, and ride sharing programs, and parking demand management programs.<sup>7</sup> The Proposed Project's list of transportation improvements include transit enhancements, active transportation projects, transportation demand management programs, and roadway and ITS projects; these projects are intended to mitigate VMT.

The comment provides no substantial evidence supporting the need for different analysis or conclusions from those in the EIR or Nexus Study. Therefore, there is no basis for additional environmental analysis or nexus analysis and no further response is required (CEQA Guidelines, Sections 15204(c))."

Sincerely,

A handwritten signature in blue ink that reads "Sarah Brandenburg". The signature is written in a cursive, flowing style.

Sarah Brandenburg  
Principal

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<sup>7</sup> Governor's Office of Planning and Research. 2016, January 20. Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA: Implementing Senate Bill 743 (Steinberg, 2013). Available: [https://www.opr.ca.gov/docs/Revised\\_VMT\\_CEQG\\_Guidelines\\_Proposal\\_January\\_20\\_2016.pdf](https://www.opr.ca.gov/docs/Revised_VMT_CEQG_Guidelines_Proposal_January_20_2016.pdf). Accessed on May 24, 2016.