

January 3, 2019

Habib Balian, Chief Executive Officer  
Metro Gold Line Foothill Extension Construction Authority  
406 E. Huntington Drive  
Monrovia, CA 91016

**Re: Formal Response to the Supplemental Environmental Impact Report—Gold Line Phase 2B Procurement**

Dear. Mr. Balian:

This letter is intended to serve as a formal City of Montclair multi-level response to:

1. The Supplemental Environmental Impact Report (SEIR) for the Metro Gold Line Foothill Extension Construction Authority Phase 2B Project from Glendora to Montclair, and the proposed splitting of the Phase 2B Project into multiple procurement phases, with future Gold Line stations in either La Verne or Pomona serving as a temporary terminus until Gold Line light rail service is extended to the Montclair Transcenter in a future procurement phase. The City of Montclair respectfully opposes splitting the Phase 2B procurement and, instead, requests the Construction Authority to use available Metro, CalSTA TIRCP, and SBCTA funds as a local match to pursue Federal Transit Administration grants, or other funds, to complete the Phase 2B Project as a single procurement.
2. A letter submitted by the San Bernardino County Transportation Authority (SBCTA) to the Construction Authority dated on or about December 21, 2018, and entered into the public record regarding the Phase 2B SEIR. The City of Montclair respectfully objects to a position taken in the SBCTA letter that Gold Line light rail service sharing approximately three miles of Metrolink San Bernardino Line alignment from Pomona to Montclair represents a serious harm to the San Bernardino Line's ridership viability, and that this concern should cause a re-evaluation of the Gold Line light rail extension to Pomona, Claremont and/or Montclair.

The City of Montclair assiduously asserts that the Gold Line light rail extension must and should be continued to the Montclair Transcenter to provide the necessary public transit connectivity and accessibility that will effectively serve to provide the largest degree of public transit access in the east end of Los Angeles County and the west end of San Bernardino County. The Montclair Transcenter presently provides the highest level of public transit access for this combined area, with commuter rail service provided via the Metrolink San Bernardino line; and local and regional bus service provided via the Foothill Transit Silver Streak with service to Union Station, Foothill Transit Local Line 690 with service to Azusa, Omnitrans bus services (including local routes 66, 85, 88, and 290), Riverside Transit Agency (RTA) route 204 with service to downtown Riverside, and the Flix Bus with state-to-state service to Las Vegas.

The Montclair Transcenter has capacity to park 1,600 vehicles—the largest parking capacity along the Metrolink San Bernardino line and at current and future Gold Line stations. Parking at the Montclair Transcenter is at no cost. The City of Montclair is also acquiring land and working with developers to construct additional transit parking capacity for up to 300 vehicles in a project proposed for development south of the Metrolink tracks at the Montclair Transcenter. The Montclair Transcenter is also adjacent to the Pacific Electric Bike Trail, and has capacity for bicycle locker storage.

The Montclair Transcenter can also host ride-share/hailing services (offered through carriers such as Uber, Via and Lyft), kiss-and-ride drop off services, and shuttle services to Ontario International Airport (ONT) and other destinations—the potential for this latter service will be greatly improved when the I-10 Freeway Express Lane Project (two express lanes in either direction, between Montclair and Interstate 15) is completed in 2023-24, providing shuttle and ride-sharing service access to Express Lanes for a quick, approximately ten-minute ride to ONT. Until such time that direct commuter rail, light rail, or other form of people-mover service is available to deliver airline passengers directly to ONT, shuttle and ride-sharing services out of the Montclair Transcenter represents the most viable transit-, shuttle- and ride-hailing-delivery option for ONT-bound airline passengers.

The importance of achieving transit access to ONT cannot be understated. ONT is generally recognized as vital to the economic health of the Inland Empire. Its current underutilized capacity can only benefit by transit access made available by public transit carriers such as Metrolink delivering passengers that live in and around the Metrolink corridor and in the Los Angeles area, and by the Gold Line delivering passengers that live in Pasadena and the foothill cities of the San Gabriel Valley.

Approximately 40 years ago, Los Angeles County officials made a regrettable and unwise decision to not extend public transit to Los Angeles International Airport (LAX)—marking LAX as one of the only international airports in the nation without public transit access. Los Angeles County leaders are now erasing that error in judgment with an anticipated 2020 extension of the Green Line's Crenshaw /LAX light rail service to the Aviation Station, with "people mover" access directly to LAX terminals scheduled for 2023.

Delaying Gold Line light rail service to the Montclair Transcenter beyond 2026 will only harm the delivery of future airline passengers to ONT via public transit and direct shuttle service, pushing such access further into the future and harming the ability of ONT to fully achieve its potential as an international airport.

The City of Montclair has also made ardent strides to develop a transit district to serve the Montclair Transcenter. Through the Amended North Montclair Downtown Specific Plan and the Montclair Place Specific Plan presently under development, the City of Montclair anticipates delivering more than 6,000 residential units in and around the Montclair Transcenter, and many of those housing units have been developed, are under development, or are being planned for development.

Only through the effort of cities working with transit providers can the Los Angeles, Orange and Inland Empire regions fully realize significant growth in public transit and its promised beneficial impacts on the environment and the lives of people living in the region. To that end, the City of Montclair takes the position that Gold Line light rail service sharing approximately three miles of the Metrolink San Bernardino

Line corridor does not represent a competitive service that threatens the future of Metrolink ridership; rather, it complements and expands on the promise of public transit's future. Gold Line light rail service draws in passengers from different regions, and delivers them to San Bernardino County to enjoy the benefits of the area for living, working, enjoyment, and easy access to a major international airport.

The Gold Line creates opportunity for the Metrolink San Bernardino Line because it would deliver passengers to the Montclair Transcenter—passengers who can continue to explore San Bernardino County via Metrolink service that extends east to San Bernardino and Redlands via the future Redlands Passenger Rail Project. Furthermore, with Gold Line light rail serving the Montclair Transcenter, the Metrolink San Bernardino Line could potentially achieve the ridership levels projected by SBCTA in its Appendix entitled "[Development of Ridership Forecasts for the San Bernardino Infrastructure Improvement Study](#)". Via an updated Los Angeles County Metropolitan Transportation Authority (Metro) ridership transfer system that allows passengers to easily migrate to a network of transit services, Gold Line riders travelling east out of the Montclair Transcenter could transfer to Metrolink San Bernardino Line railcars to continue their journey, and San Bernardino County residents travelling west to San Gabriel Valley foothill cities and Pasadena could transfer from Metrolink San Bernardino Line railcars at the Montclair Transcenter to Gold Line light rail cars.

Without strong transit leadership and a vision to promote connectivity and transit accessibility, transit ridership will decline and even the Los Angeles area, with its massive rail system build-out supported by an estimated \$120 billion in Measure M tax revenues over 40 years, would be adversely impacted.

The challenge to Metrolink is not the Gold Line; instead, declining ridership across Metrolink's service corridors is more directly attributed to lower gasoline prices, health of the economy, increasing car ownership, the choice of demographic groups to not use transit, the presence of a homeless population at transit centers and on rail cars, and the concern of riders for personal safety and security. Technology is also a contributor to ridership decline through the expansion of e-commerce, telecommuting, and distance-learning. Other advances such as bike-share and car-share programs, app-based ride-hailing services and vehicle automation suggest other challenges to the future of transit and its ridership base.

In order to circumvent these challenges, there is an obvious need for transit to coordinate with, and integrate into, the expanding network of mobility services. Essentially, public transit becomes the bulk deliverer of passengers through its backbone system of rail and bus lines—a system that then allows passengers to merge into a larger transit mobility network of personal cars, micro-transit services, bicycling, pedestrian travel, ride-sharing, ride-hailing services, taxicabs, shuttle services, and other forms of personal travel that take the transit passenger to the point of destination.

Further, transit leaders need to encourage partnerships that embrace and integrate into the mobility network; and connecting to transit hubs such as the Montclair Transcenter is essential to this process. Without connectivity, accessibility, and integration public transit will remain as a series of isolated systems that fail to effectively integrate into the emerging mobility network that functions to deliver riders to their destinations—a fact readily apparent when looking at a map of public transit services that reveals vast gaps and voids where public transit fails to reach. Only by achieving a targeted level of connectivity to,

and integration with, a larger mobility network can public transit truly become efficient and effective in delivering services.

Government leaders in the transit industry must develop the vision to see beyond what transit is in order to see what it can be. These leaders have a unique opportunity to achieve an extraordinary level of connectivity, accessibility, and integration in the delivery of transit services—it may, in fact, be the only means to make public transit attractive, functional, and viable long-term. Without this connectivity and accessibility to a large mobility network, transit cannot integrate deeply into the regions served, nor can it successfully connect with the minds and needs of its traditional users and an expanded base of users. This level of integration requires public and private partnerships, as government alone does not have the resources or capacity to achieve the necessary level of transit integration that can make an expansive mobility network truly functional.

Transit hubs serve to unite a region’s vast transit corridors and deliver the passengers that feed into the larger mobility network that disperses passengers via smaller or micro-transit platforms. This process represents the most economical and efficient means of delivering transit passengers. In short, connectivity and its integration into the mobility network is the future of transit; it is the future means to maintain and increase transit ridership to desirable levels. Delivery of Gold Line light rail service to the Montclair Transcenter—a major transit hub—is logical and essential to that transit future and the future of the Gold Line, Metrolink San Bernardino Line, ONT, and the region.

The balance of this document serves to support the City of Montclair’s formal response to (1) the Supplemental Environmental Impact Report (SEIR) for the Metro Gold Line Foothill Extension Construction Authority Phase 2B Project from Glendora to Montclair, and the proposed splitting of the Phase 2B Project into multiple procurement phases, with future Gold Line stations in either La Verne or Pomona serving as a temporary terminus until Gold Line light rail service is extended to the Montclair Transcenter in a future procurement phase; and (2) the letter submitted by SBCTA to the Construction Authority dated on or about December 21, 2018, and entered into the public record regarding the Phase 2B SEIR.

- I. The City of Montclair maintains that [Assembly Bill 1600](#) (AB 1600), introduced by then Assembly Member Norma Torres and Chaptered as Section 132400 et seq. of the Public Utilities Code statutorily mandates that (1) the City of Montclair/Montclair Transcenter is an extension city for Gold Line light rail service; (2) is the designated eastern terminus of the Gold Line; and (3) that every effort should be made to secure the necessary funds to construct the Gold Line eastern extension to the Montclair Transcenter.

AB 1600 statutorily provides that the Metro Gold Line Foothill Extension Construction Authority (Construction Authority) construct the “project” (the Los Angeles-Pasadena Foothill Extension Gold Line light rail project, and any mass transit guideway that may be planned east of the Sierra Madre Villa Boulevard along the rail right-of-way) to the City of Montclair.

AB 1600 amended Section 132400(f) of the Public Utilities Code to provide that the “extension cities” are the Cities of Arcadia, Monrovia, Duarte, Irwindale, Azusa, Glendora, San Dimas, La Verne, Pomona, Claremont and **Montclair**.

Prior to adoption of AB 1600, the Construction Authority was authorized to accept grants, fees and allocations from the state, local agencies and private entities. AB 1600 amended Section 132410(a) and Section 132410(a)(1) of the Public Utilities Code to provide that the “Construction Authority has all of the powers necessary for...building the project, including, but not limited to,...(1) Acceptance of grants, fees, allocations and transfers of funds from federal, state, and local agencies, as well as private entities”.

The Construction Authority constructed the project from Los Angeles’ Union Station to Sierra Madre Villa Boulevard in the City of Pasadena, and from Sierra Madre Villa Boulevard to APU/Citrus College in the City of Azusa, in two separate phases.

To date, the Construction Authority has completed advanced construction engineering and environmental and utility realignment work (the latter designated as Design-Build 1, or DB-1) for the next phase of the project, known as Phase 2B, from the City of Glendora to the City of Montclair.

To provide for construction of Phase 2B, the Metropolitan Transportation Authority (Metro) allocated funds from Los Angeles County’s Measure M transportation tax measure; in addition Metro, the Construction Authority and the San Bernardino County Transportation Authority (SBCTA), in December 2017, jointly applied for, and in April 2018 were awarded approximately \$280+ million in grant funding through the [Transit and Intercity Rail Capital Program \(TIRCP\)](#), administered by the California State Transportation Agency (CalSTA), to construct Phase 2B from the City of Glendora to the City of Montclair. TIRCP funds derive from the state’s cap-and-trade auction program and Senate Bill 1’s (SB 1) State Rail Assistance Program.

Construction for that portion of the Phase 2B Project in San Bernardino County, from the Los Angeles County-San Bernardino County line between the cities of Claremont and Montclair to the Montclair Transcenter (the Montclair Segment), would be funded by approximately \$48 million secured through SBCTA and approximately \$39 million of the April 2018 CalSTA TIRCP award to Metro for the Phase 2B Project.

In mid-2018, the Construction Authority released its Request for Bids (RFP) to the following short-listed team of potential project bidders:

1. AECOM | Stacy and Witbeck JV
2. Herzog Rados Lane, a Joint Venture
3. Kiewit-Parsons, a Joint Venture
4. San Gabriel Valley Transit Partners (STP), a Joint Venture of Fluor and Ames

Bid packages for construction of the alignment portion (Design-Build 2, or DB-2) of Phase 2B were received by the Construction Authority in September 2018 from each of the four teams. The lowest responsible bid came in at approximately \$570 million above projected construction costs for the Phase 2B alignment. Received high bids were reportedly based on a number of factors including the impact of Trump Administration tariffs on the chain of

construction materials, cost inflation factors, risk, cost of labor, and labor shortages in the construction industry.

In November 2018, the Construction Authority Board of Directors accepted the responding bids and, in response to the higher-than-anticipated bid pricing for the Phase 2B Project, determined to split Phase 2B into multiple build-procurements. The Board also directed staff to ask the two lowest responsible bidders to re-bid on the project's separate procurement phases in order to provide the Construction Authority with accurate costing for construction of each procurement phase. This "re-bid" process would enable the Construction Authority to accurately determine (1) the cost to construct each procurement phase, and (2) the revenue shortfall related to the cost of construction for the balance of the project—either from La Verne to Claremont/Montclair or Pomona to Claremont/Montclair. The Construction Authority is in the process of determining the number of procurement phases, with either the City of La Verne or the City of Pomona serving as the "temporary" terminus until Phase 2B can be fully completed to its designated eastern terminus, either in the City of Claremont or the statutorily (AB 1600) designated terminus in the City of Montclair.

- a. The City of Montclair maintains that (1) pursuant to AB 1600, the Gold Line Construction Authority is, and remains, under legal obligation to build the Phase 2B Project from the City of Glendora to the cities of Pomona, Claremont and Montclair; and (2) the Construction Authority is, and remains, under legal obligation to pursue all available means of generating funding, including from both federal and state sources, to achieve construction of Gold Line light rail service to the cities of Glendora, San Dimas, La Verne, Pomona, Claremont, and Montclair.
- b. The City of Montclair objects to the splitting of Phase 2B into separate procurement phases and, instead, requests the Construction Authority use the estimated \$630 million in available Metro, CalSTA TIRCP, and SBCTA funding for construction of the Phase 2B Project as a local match, and apply to the Federal Transit Administration (FTA) for \$570 million (approximate) in Federal New Starts grant funds (or other grants) to complete construction of the Phase 2B Project.
  - i. The City of Montclair understands and appreciates that federalization of the Phase 2B Project from Glendora to Montclair would require compliance with the National Environmental Protection Act (NEPA); however, the Phase 2B Project's clearance through the California Environmental Quality Act (CEQA) has already equipped the project to clear through many of the requirements of NEPA. The City of Montclair also understands and appreciates that NEPA may add up to two years for Phase 2B to clear NEPA requirements; however, the Phase 2B Project has faced recurring construction timeline changes over the past decade, including two additional years, minimum, now proposed by the Construction Authority to complete the Phase 2B Project to Pomona and/or Claremont and Montclair, changing the target completion date from 2026 to 2028. This proposed construction timeline change stems from the

recommendation to split the Phase 2B Project into multiple construction procurements. However, the 2028 construction timeline is dependent on the ability to generate new funding for construction of that segment of the Phase 2B Project from La Verne to Montclair (or Pomona to Montclair, based on the rebid of the alignment into two or more procurement phases). Since, in all probability, the Construction Authority will need to pursue federal funding to close the funding gap for construction of Gold Line light rail service beyond La Verne or Pomona, the Construction Authority should comply with its obligation to build the Phase 2B Project in its entirety at the outset of the project and comply with its obligation to fully access available federal and state funds to achieve completion of the Phase 2B Project. By not leveraging its local resources as a match for federal funding, the Construction Authority would lose a valuable resource to achieve connectivity and accessibility through the Montclair Transcenter—the only major transit hub serving the east end of Los Angeles County and the west end of San Bernardino County.

- ii. The City of Montclair maintains that pursuant to AB 1600, the Construction Authority has all of the powers necessary for building the project, including, but not limited to acceptance of grants, fees, allocations and transfers of funds from **federal**, state, and local agencies, as well as private entities. Furthermore, in early December 2018, the Metro Board of Directors, including Los Angeles County Supervisors Hilda Solis and Kathryn Barger, Los Angeles Mayor Eric Garcetti, and Metro Board Directors John Fasana and Ara Najarian, voted to reaffirm the agency's commitment to funding and completing the Foothill Gold Line light rail extension from Glendora to Montclair (Phase 2B) as a Metro "first priority project". The motion also directed Metro staff to identify funding sources and approaches to fill the funding gap identified by the Foothill Gold Line Extension Construction Authority (the Construction Authority) through the currently on-going procurement. It is noted that while the Phase 2B Project is proposed to be constructed from Glendora to Montclair, the Board's action can only recommend construction to Claremont in Los Angeles County. The City of Montclair is outside of Los Angeles County, directly east of the City of Claremont in San Bernardino County. The Montclair Segment of the Gold Line Phase 2B Project from the Los Angeles County-San Bernardino County border to the Montclair Transcenter is under the jurisdiction of the San Bernardino County Transportation Authority (SBCTA). SBCTA has separately and jointly, with Metro and the Construction Authority, secured funding for construction of the Montclair Segment. Any application by the Construction Authority to secure federal or state funding should be completed jointly with SBCTA to ensure that additional funding requirements for construction of the Montclair Segment are successfully obtained.

The approved Metro Board action includes the following language:

***WE THEREFORE MOVE*** that the Board:

- *Reaffirm its commitment to complete the Foothill Extension to Claremont as a first priority project, per the final and unanimous vote to approve the 2009 Long Range Transportation Plan, and in accordance with promises made to county voters in 2008 and 2016 when they overwhelmingly supported Measures R and M [Item 10.1 of the minutes of the October 22, 2009, meeting of the Board of Directors of the Los Angeles County Metropolitan Transportation Authority adopting the 2009 Long Range Transportation Plan included language directing Metro “As a first priority, pursue other potential funding sources...which are not currently in the 2009 LRP,...to close the funding gaps on the Gold Line Foothill Extension....This evaluation shall include, but not be limited to,...Federal Re-authorization, Federal Climate Change Transit Funds, Federal Stimulus Funds, and other Federal and State funds.”];*
  - *Oppose any actions or proposals that would reduce or eliminate already committed funding secured on behalf of the Foothill Extension project and/or that could disrupt the ability of the Construction Authority to complete the project to Claremont, including but not limited to proposals to introduce new rail service within the future Gold Line corridor that could make it more difficult and more costly to complete the project to Claremont;*
  - *Direct our CEO to work closely with the Construction Authority to identify possible funding sources and approaches that could be used to fill the remaining funding gap to build the project all the way to Pomona and to Claremont; and*
  - *Direct our CEO to report back to the Board in January 2019 with options for initial funding to extend the first phase beyond La Verne to Pomona, with the second phase consisting of Claremont and Montclair.*
- c. In the event that the Construction Authority moves forward with the Phase 2B Project as a multi-procurement Project, and identifies separately the cost for construction of the La Verne to Claremont/Montclair or Pomona to Claremont/Montclair procurement, the City of Montclair requests that the Construction Authority use the remaining balance of funds available from Metro, CalSTA TIRCP, and SBCTA and reserved for construction of the Phase 2B Project from La Verne to Montclair or Pomona to Montclair as a local match for application to the FTA (or other entity) for a Federal New Starts grant (or other grant).

The grant amount would be based on the total required amount of funding necessary to complete construction of the La Verne to Montclair or Pomona to Montclair segment of the split Phase 2B Project, minus the amount of available Metro, TIRCP and SBCTA funds reserved for the La Verne to Montclair or Pomona to Montclair procurement portion of the Phase 2B Project (the local match).

- i. The City of Montclair understands and appreciates that federalization of the Phase 2B Project from Glendora to Montclair would require compliance with the National Environmental Protection Act (NEPA); however, the Phase 2B Project’s clearance through the California Environmental Quality Act (CEQA) has already equipped the project to clear through many of the requirements of NEPA. The City of Montclair also understands and appreciates that NEPA may add up to two years for the La Verne to Montclair or Pomona to Montclair procurement to clear NEPA requirements; however, the Phase 2B Project has faced recurring construction timeline changes over the past decade, including two additional years, minimum, now proposed by the Construction Authority to complete the Phase 2B Project to Pomona and/or Claremont and Montclair, changing the target completion date from 2026 to 2028. This proposed construction timeline change stems from the recommendation to split the Phase 2B Project into multiple construction procurements. However, the 2028 construction timeline is dependent on the ability to generate new funding for construction of that segment of the Phase 2B Project from La Verne to Montclair (or Pomona to Montclair, based on the rebid of the alignment into two or more procurement phases). Since, in all probability, the Construction Authority will need to pursue federal funding to close the funding gap for construction of Gold Line light rail service beyond La Verne or Pomona, the Construction Authority should comply with its obligation to build the Phase 2B Project in its entirety at the outset of the project and comply with its obligation to fully access available federal and/or state funds to achieve completion of the Phase 2B Project. By not leveraging its state and locally derived resources as a local match for federal funding, the Construction Authority would lose a valuable resource to achieve connectivity and accessibility through the Montclair Transcenter—the only major transit hub serving the east end of Los Angeles County and the west end of San Bernardino County.
- iii. The City of Montclair maintains that pursuant to AB 1600, the Construction Authority has all of the powers necessary for building the project, including, but not limited to acceptance of grants, fees, allocations and transfers of funds from **federal**, state, and local agencies, as well as private entities. Furthermore, in early December 2018, the Metro Board of Directors, including Los Angeles County Supervisors Hilda Solis and Kathryn Barger, Los Angeles Mayor Eric Garcetti, and Metro Board Directors John Fasana and Ara Najarian, voted to reaffirm the agency’s commitment to funding and

completing the Foothill Gold Line light rail extension from Glendora to Montclair (Phase 2B) as a Metro “first priority project”. The motion also directed Metro staff to identify funding sources and approaches to fill the funding gap identified by the Foothill Gold Line Extension Construction Authority (the Construction Authority) through the currently on-going procurement. It is noted that while the Phase 2B Project is proposed to be constructed from Glendora to Montclair, the Board’s action can only recommend construction to Claremont in Los Angeles County. The City of Montclair is outside of Los Angeles County, directly east of the City of Claremont in San Bernardino County. The Montclair Segment of the Gold Line Phase 2B Project from the Los Angeles County-San Bernardino County border to the Montclair Transcenter is under the jurisdiction of the San Bernardino County Transportation Authority (SBCTA). SBCTA has separately and jointly, with Metro and the Construction Authority, secured funding for construction of the Montclair Segment. Any application by the Construction Authority to secure federal or state funding should be completed jointly with SBCTA to ensure that additional funding requirements for construction of the Montclair Segment are successfully obtained.

The approved Metro Board action includes the following language:

***WE THEREFORE MOVE*** that the Board:

- *Reaffirm its commitment to complete the Foothill Extension to Claremont as a first priority project, per the final and unanimous vote to approve the 2009 Long Range Transportation Plan, and in accordance with promises made to county voters in 2008 and 2016 when they overwhelmingly supported Measures R and M [Item 10.1 of the minutes of the October 22, 2009, meeting of the Board of Directors of the Los Angeles County Metropolitan Transportation Authority adopting the 2009 Long Range Transportation Plan included language directing Metro “As a first priority, pursue other potential funding sources...which are not currently in the 2009 LRP,...to close the funding gaps on the Gold Line Foothill Extension....This evaluation shall include, but not be limited to,...Federal Re-authorization, Federal Climate Change Transit Funds, Federal Stimulus Funds, and other Federal and State funds.”];*
- *Oppose any actions or proposals that would reduce or eliminate already committed funding secured on behalf of the Foothill Extension project and/or that could disrupt the ability of the Construction Authority to complete the project to Claremont, including but not limited to proposals to introduce new rail service*

*within the future Gold Line corridor that could make it more difficult and more costly to complete the project to Claremont;*

- *Direct our CEO to work closely with the Construction Authority to identify possible funding sources and approaches that could be used to fill the remaining funding gap to build the project all the way to Pomona and to Claremont; and*
- *Direct our CEO to report back to the Board in January 2019 with options for initial funding to extend the first phase beyond La Verne to Pomona, with the second phase consisting of Claremont and Montclair.*

- II. The City of Montclair maintains that [Measure I](#) (Ordinance No. 04-01), San Bernardino County’s half-cent sales tax measure for transportation improvements, together with its incorporated Expenditure Plan, directs the County’s transportation authority (SBCTA) to fund construction and operation of an extension of Gold Line light rail service to the Montclair Transcenter.

First approved by San Bernardino County voters in November 1989, Measure I was reauthorized in November 2004, at which time the Gold Line extension was added. SBCTA administers Measure I revenue and ensures projects are implemented in compliance with the Expenditure Plan, incorporated into the Measure I Ordinance as Exhibit A. In order to achieve effective administration of the Expenditure Plan and address regional requirements, Measure I divides San Bernardino County into five distinct “subareas.”

The San Bernardino Valley Subarea of the Expenditure Plan is that area described as the Valley Subarea and includes the cities of Chino, Chino Hills, Colton, Fontana, Grand Terrace, Highland, Loma Linda, Montclair, Ontario, Rancho Cucamonga, Redlands, Rialto, San Bernardino, Upland, and Yucaipa, and unincorporated areas in the east and west portions of the San Bernardino valley urbanized area.

Pursuant to Section G of the San Bernardino Valley Subarea Expenditure Plan, eight percent of revenue collected in the Valley Subarea shall fund a variety of eligible transit projects, including “*construction and operation of an extension of the Gold Line to Montclair Transit Center for San Bernardino County passengers traveling to San Gabriel Valley cities, Pasadena, and Los Angeles.*”

- a. Based on the language of Measure I and Exhibit A (the Expenditure Plan), the City of Montclair maintains that the Gold Line extension from the Los Angeles County-San Bernardino County line between Claremont and Montclair to the Montclair Transcenter (the Montclair Segment) is, and remains, an eligible project under Measure I, and that available funds, including CalSTA TIRCP funds developed jointly by Metro, the Construction Authority, and SBCTA for construction of the Montclair Segment should be

made available to the Construction Authority to complete construction of the Montclair Segment, or as a local match for the Construction Authority to apply to the FTA for federal New Starts grant funds or other federal grant funds.

- III. The City of Montclair maintains that, based on the City of Montclair’s belief and on legislative mandates (AB 1600 and San Bernardino County’s Measure I) to extend Gold Line light rail service to the Montclair Transcenter, that Gold Line light rail service would be extended to the Montclair Transcenter. Therefore, the City of Montclair acted on, and is acting on, that belief and on legislative mandates and is acting to facilitate development of a transit oriented district in North Montclair at extraordinary expense to the City and developers that acted, and are acting, with the same belief and on the intent of legislative mandates.

Since 2006, the Montclair City Council, acting on the promise of a future Gold Line light rail station at the Montclair Transcenter, has enacted measures designed to transform North Montclair into a transit-oriented district.

- a. In 2006, the Montclair City Council adopted the North Montclair Downtown Specific Plan (NMDSP), calling for development of North Montclair—the area contiguous to the Montclair Transcenter—into a transit oriented district (TOD). The NMDSP was [amended](#) in 2017 to expand the boundaries of the TOD and to incorporate new design elements to ensure development of premium-quality, high-density housing projects throughout the NMDSP area. To date, an estimated \$450 million has been invested in North Montclair, resulting in improvements to the Montclair Place regional shopping center and the addition of more than 500 housing units. An estimated 400 additional housing units are projected for construction over the next two years. In total, the City anticipates up to 6,000 high-density residential units, along with new retail, office space, and cultural, dining, and entertainment options will be added within the NMDSP area and the adjoining Montclair Place District—the latter serving as the current site of the Montclair Place regional shopping center and contiguous properties. The combined total of economic improvements in North Montclair is projected to be \$3 billion to \$4 billion.

The NMDSP is designed to capitalize on extension of Gold Line light rail service to the Montclair Transcenter where it would complement available bus and Metrolink services, converting the Transcenter to the only true multi-modal public transit facility serving the west end of San Bernardino County and the east end of Los Angeles County.

The City of Montclair’s Amended NMDSP and the Montclair Place District Specific Plan convert the goals of the Southern California Association of Governments’ (SCAG) and Metro’s ["First Last Mile Strategic Plan"](#) into a true action plan by:

- i. Facilitating the reach of transit through advocacy of infrastructure improvements and promoting development of a TOD in and around the Montclair Transcenter. TOD development expands the population base in and around the Transcenter, with the purpose and intent of promoting transit

ridership, reducing both vehicle miles travelled (VMT) and green house gas (GHG) emissions, and contributing to sustainable living by providing choice in methods of transportation, reducing energy consumption and otherwise promoting a reduction in natural resources;

- ii. Maximizing multi-modal benefits and efficiencies through the strategic expansion of Montclair Transcenter services to incorporate transit choices that include commuter rail, light rail, bus and ride sharing/hailing services; and by incorporating in and around the Montclair Transcenter a TOD that offers a pedestrian- and bicycle-friendly downtown environment for a mixed, transit-dependent population of residents, visitors, employees and employers that embrace sustainable living through a reduction in the area's carbon footprint; and
  - iii. Promoting Metro/SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Planning Policy to coordinate infrastructure investments in station areas to extend the reach of transit, with the ultimate goal of increasing transit ridership. The City of Montclair is promoting sustainable development throughout North Montclair by embracing construction of high-density residential projects within a TOD environment that would also be served by an extensive array of transit services, pedestrian- and bicycle-friendly paseos, complete streets, and an array of commercial, office, entertainment, dining and cultural opportunities. Montclair officials are also seeking to coordinate efforts with the California Department of Transportation (Caltrans) to preserve and enhance parking services in and around the Montclair Transcenter, while concurrently seeking to work with developers to develop available Transcenter property to incorporate high-density residential developments immediately adjacent to Transit facility services. In compliance with the "green" rule adopted by the California Energy Commission, Montclair is also moving forward with requiring residential property developers to incorporate solar panels on to the rooftops of eligible projects (three stories or lower) to achieve energy conservation.
- IV. The City of Montclair maintains that, in concert with the state's overarching statewide goals to promote sustainability, achieve GHG emission reduction targets, improve the quality of life for residents in disadvantaged communities, promote housing development, and otherwise comply with the state's environmental targets under [Senate Bill 32](#)—the California Global Warming Solutions Act of 2006—the City of Montclair has promoted and advocated for extension of Gold Line light rail service to the Montclair Transcenter as vital and essential to environmental quality, regional transit connectivity and accessibility, promotion of complementary transit service options, housing development, community sustainability, a "Healthy Montclair", and to improve conditions in Montclair as a CalEPA-designated disadvantaged community.

- a. In order to fulfill the vision of the City of Montclair’s [Amended North Montclair Downtown Specific Plan \(NMDSP\)](#), Montclair’s civic leaders believe it is vital and essential that the Montclair Transcenter, the only major multi-modal transit facility at the east end of Los Angeles County and the west end of San Bernardino County, function as the designated terminus for Gold Line light rail service—a completed service that would provide regional transit-connectivity that complements, not competes with, Metrolink commuter rail service.

Connectivity between trains, buses, and accessibility to TODs and surrounding areas is vital to the success of public transit. Without efficient connectivity and accessibility transit ridership will not achieve impactful results. Regionally, Los Angeles’ Union Station, and transit centers in Fullerton, Montclair, and San Bernardino provide the necessary level of transit connectivity to achieve sustained ridership success. However, the development of a population base adjacent to a transit center and the integration of a mobility network into the larger area, with accessibility through a public transit backbone, are also vital to promoting transit ridership.

Montclair’s emphasis in developing a TOD in and around the Montclair Transcenter will provide a transit-oriented population that will benefit by the Transcenter’s accessibility and connectivity, and by the addition of light rail as a complementary transit service. Furthermore, extension of Gold Line light rail service to the Montclair Transcenter complies with AB 1600, designating Montclair as the terminus for the eleven “extension cities”, as defined under Section 132400 (f) of the Public Utilities Code.

The City of Montclair also functions as one of two “disadvantaged communities” along the Phase 2B Project alignment from Glendora to Montclair—the other being Pomona. According to [California State Transportation Agency \(CalSTA\) 2018 Transit and Intercity Rail Capital Program \(TIRCP\) Guidelines](#) for grant funding, connection to disadvantaged communities is a “secondary evaluation criteria” vital to a successful application. In 2018, Metro was awarded approximately \$280 million in grant funding for the Phase 2B Project based on meeting all application criteria, including fulfilling all “primary” and “secondary” grant application requirements.

- i. Pursuant to state statute Senate Bill 862 of 2014 as amended by Senate Bill 9 of 2015, the TIRCP is required to “*fund transformative capital improvements, including the facilities that support them, that significantly reduce vehicle miles traveled, congestion, and greenhouse gas emissions, along with achieving geographic equity.*” Core to the application process is the requirement to denote disadvantage communities, low-income communities, and/or low-income households that will benefit from proposed project. Specifically, an applicant should discuss how “*some or all of the [proposed] project provides direct, meaningful, and assured benefits to a disadvantaged community, low income communities or low income households.*”

It is an obvious goal of the TIRCP to maximize benefits to disadvantaged communities and low income communities and households, of which Montclair qualifies. Senate Bill 535 of 2012, as amended by Assembly Bill 1550 of 2016 codifies that, pursuant to the California Climate Investments Program, projects funded with Cap-and-Trade auction proceeds must result in: (1) a minimum of 25 percent of the available moneys in the Greenhouse Gas Reduction Fund be allocated to projects located within, and benefiting individuals living in, disadvantaged communities; (2) an additional minimum of 5 percent is to be allocated to projects that benefit low-income households or to projects located within, and benefiting individuals living in, low-income communities located anywhere in the state; and (3) an additional minimum of 5 percent be allocated either to projects that benefit low-income households that are outside of, but within a 1/2 mile of, disadvantaged communities, or to projects located within the boundaries of, and benefiting individuals living in, low-income communities that are outside of, but within a 1/2 mile of, disadvantaged communities.

A map identifying communities in California identified as disadvantaged communities, as determined by the California Environmental Protection Agency (CalEPA), is available at the [CalEPA](#) website. As indicated in the CalEPA map depicting disadvantaged communities, the cities of Pomona and Montclair meet the CalEPA criteria for disadvantaged communities and, thus, are vital to the achieving the objectives of CalSTA, CalEPA, the California Climate Investment Program, and the California Air Resources Board. Further, both cities provide a necessary component of the qualifying “secondary” criteria for a successful TIRCP application. The City of Montclair maintains that without the inclusion of Pomona and Montclair into the Phase 2B Project, the qualifying criteria for a TIRCP grant has not been met, rendering the future of the grant in doubt. The City of Montclair further maintains that a split Phase 2B project that includes a procurement from Glendora to La Verne does not meet the qualifying “secondary” criteria; i.e., such a project does not include a disadvantage community as defined by CalEPA and, thus, endangers the TIRCP grant or a significant share of the TIRCP grant.

In addition to contributing benefits towards meeting or exceeding the AB 1550 investment minimums, the TIRCP has a statutory investment target for benefits to disadvantaged communities required by SB 862 (a 25 percent minimum). This target goal applies across the entire program regardless of funding source. Further, SB 862 requires the California Air Resources Board (CARB), in consultation with CalEPA, to develop funding guidelines for all agencies that are appropriated monies from the Greenhouse Gas Reduction Fund. These guidelines must include a component for how administering agencies should maximize benefits for disadvantaged communities.

V. In compliance with Senate Bill 32 to reduce green house gas (GHG) emissions and achieve improved environmental quality, the City of Montclair promotes extension of Gold Line light rail service to the Montclair Transcenter as essential to achieve positive GHG emission reductions.

- a. Reducing GHG emissions is a primary goal of Southern California’s public transit systems; and central to this goal is targeted reductions in vehicle miles travelled (VMT)—achieved by moving commuters out of their vehicles and off freeways, highways and streets by incentivizing them to utilize public transit. Providing transit capacity sufficient to accommodate ridership demand is the first step toward incentivizing riders and producing targeted GHG reductions. The City of Montclair maintains that providing transit options at the Montclair Transcenter, including commuter- and light-rail, is a logical step in achieving “sufficient ridership capacity” and reducing GHG emissions.

A primary evaluation criteria under CalSTA 2018 Transit and Intercity Rail Capital Program grant funding guidelines is the requirement for a proposed project to produce GHG emission reductions. As proposed under the 2018 TIRCP application, Pomona, Claremont and Montclair are pivotal to demonstrating GHG reductions that may occur as a result of Phase 2B Project implementation. Total cost per ton of carbon dioxide equivalents (CO<sub>2</sub>e) reduction and Transit and Intercity Capital Program funding per ton of CO<sub>2</sub>e reduction were primary elements of the evaluation for project selection. In addition, the estimated reduction in GHG emissions were required to demonstrate a benefit to disadvantaged communities, low-income communities, and/or low-income households. Removal of Pomona and/or Claremont and Montclair fails to achieve estimated reductions in GHG emissions and removal of Pomona and Montclair from the Phase 2B Project fails to effectively demonstrate a benefit to disadvantaged communities, low-income communities, and/or low-income households.

VI. The City of Montclair maintains that by failing to connect with Pomona and/or Claremont and Montclair, a split Phase 2B Project would not significantly promote improved transit because the Project, in not connecting to Montclair’s multi-modal Transcenter, would (1) fail to effectively expand and improve rail and transit services; (2) fail to directly connect with other rail, bus, and transit services; (3) fail to promote the future of transit through adequate connectivity and accessibility to an expanding mobility network; and (4) fail to establish the connecting infrastructure for future expansion of light rail or other transit to ONT.

The City of Montclair also maintains that extension of Gold Line light rail service to the Montclair Transcenter serves to **complement** regional transit services, and not harm Metrolink San Bernardino Line ridership as contended by a letter submitted to the Construction Authority by SBCTA on or about December 21, 2018. Further, the City of Montclair contends that SBCTA should consider other causes to Metrolink’s ridership decline—a decline that has occurred system-wide. These other causes may include economic, societal, and systemic factors—the latter including an apparent reluctance to effectively

integrate with other transit services and embrace and integrate with an expanding mobility network.

- a. The City of Montclair maintains that connectivity and accessibility are vital to the current and future success of public transit. However, in a [letter](#) to the Construction Authority from the San Bernardino County Transportation Authority (SBCTA), dated on or about December 21, 2018, SBCTA argues that integration of the Gold Line along the Metrolink alignment from Pomona to Montclair would significantly harm Metrolink ridership. SBCTA presumably uses a pre-study report released by Metrolink dated July 19, 2017, and entitled "[Objective: Increase Ridership](#)". According to the report, the San Bernardino line, which includes the Covina Metrolink station, experienced a 7.6 percent overall decline in ridership from **January to March 2016** as compared to the same period in 2015. This decline reportedly increased to 25 percent at the Covina Metrolink station after the Gold Line Azusa Downtown and APU/Citrus Gold Line stations became operational in **March 2016**—a decline presumably attributed to “rail-to-rail migration”—for a total loss of 56,620 riders. The next closest decline in ridership for the same period was on the Inland Empire-Orange County Line, which reportedly saw a 4 percent decrease, or 14,488 fewer riders.

In fact, there is no clear and definitive empirical study or evidence that can positively attribute ridership decline at the Covina Metrolink station to the singular phenomenon of rail-to-rail migration. Between 2014 and 2017, the [Rancho Cucamonga Metrolink Station](#) reportedly saw a 25 percent decline in ridership—attributed to a \$4.50 per day parking charge introduced at the station, significantly lower gas prices that drew many riders back to private vehicles, and elimination of a rush hour express train from Los Angeles’ Union Station to San Bernardino, with stops only in San Bernardino, Rancho Cucamonga, Covina and Los Angeles. A competing rail line was not reported as a factor in the 25 percent decline at the Rancho Cucamonga Metrolink Station.

Further, a January 2018 Southern California Association of Governments (SCAG) study, "[Failing Transit Ridership: California and Southern California](#)", demonstrates that public transit use has fallen significantly in the past decade. From 2012-15, Ventura, Los Angeles, Orange, San Bernardino, Riverside and Imperial counties lost 72 million annual public transit rides, both bus and rail, despite the fact that since 1990, the SCAG region added more than 100 miles of light- and heavy-rail in Los Angeles County and more than 350 miles of commuter rail region-wide. The study notes that Metro’s loss represents approximately 72 percent of total ridership loss, statewide, and that the primary cause of ridership decline was a dramatic increase in private automobile ownership—2.1 million vehicles were added to households from 2000 to 2015—and many of these household represented traditional transit users. A corollary to these added vehicles has been, of course, greatly increased traffic congestion, which can make for an increased opportunity for transit providers to recapture lost riders.

The SCAG study does not make recommendations to resolve transit’s failure to hold onto or expand its ridership base; it does, however, note that the SCAG region has “vast untapped potential” for new public transit riders. The SCAG region represents a population of approximately 14.5 million people; and if one out of four used transit just twice monthly instead of a vehicle, annual ridership would grow by 96 million.

Driving may be inexpensive in the form of vehicle operating costs, but it is not inexpensive in its impacts on the environment, or in the time it forces people to endure long commutes on the state’s roads, freeway, and highways. Public transit professionals must come to recognize that without connectivity, accessibility, and integration into the mobility network public transit will remain in the backwash of emerging, modern transit services. Micro-transit, for example, is an emerging public transit concept that utilizes the model for private ride hailing services like Uber, Lyft, and Via to provide door-to-door accessibility; and many cities already deploy shuttle services that are on-call to pick up senior citizens and transport them to medical appointments, and shopping, and civic activities.

Public transit leaders have an obligation to save public transit by (1) recognizing the need to use existing public transit as the backbone for a transit mobility network; (2) using that backbone as the means to move and deliver large numbers of riders to points of connection for access to the larger mobility network that criss-crosses the landscape to connect all points; (3) integrating into that mobility network as a partner and service provider; and (4) expanding on public transit services by welcoming parallel services that reach points of connectivity where they expand on accessibility.

Objectively, many factors contribute to a decline in transit boardings, just as other factors and trends contribute to an increase in transit boardings. These factors can include, but are not limited to, availability of other transit services, price of fuel, cost of transit ridership versus cost of vehicle commute, intended destination, connectivity, accessibility, job requirements, seasonal weather, economic conditions, growth in vehicle ownership, the number of people in a travelling group which (from a cost perspective) factors into a decision to use transit or a personal vehicle, frequency of trains, reliability of transit, and train comfort and accommodations.

Nonetheless, accepting for the moment that the March 2016 opening of Gold Line light rail stations in Azusa contributed to a decline in transit boarding at the Covina station, at least temporarily, the City of Montclair respectively makes the following observations that may also serve as functional causes for the decline in ridership out of the Covina Metrolink Station:

- i. The Gold Line serves the Foothill cities of the San Gabriel Valley, Pasadena and Los Angeles. In contrast, Metrolink is a direct line between Los Angeles’ Union Station and San Bernardino. Together, they are complementary services and represent a larger part of accessibility and a mobility network that should be

designed to serve the needs of transit riders and provide the greatest level of penetration into a region to promote the connectivity and accessibility that transit is vitally dependent on.

- ii. Ridership out of the Covina Metrolink station declined, in part, because many of the transit riders previously using the Covina Metrolink station were from neighborhoods closer to the new Azusa Gold Line stations, and found it more convenient to access transit service at the Azusa stations—in effect, these transit riders chose to take advantage of “transit ridership in my backyard” (TRIMBY).
- iii. The Gold Line light rail trip out of the Azusa stations does not appreciably increase the commute time to Los Angeles’ Union Station, and is certainly more advantageous if the destination is Pasadena or other foothill cities in the San Gabriel Valley.
- iv. Transit riders out of Azusa who may be going beyond Los Angeles’ Union Station on Gold Line light rail service are not required to de-board at Union Station or transfer to other transit services.
- v. The Gold Line offers a direct route to Pasadena as a destination, whereas Metrolink riders would require a transfer out of Los Angeles’ Union Station to the Gold Line for transit service to Pasadena, adding greater time for a Metrolink commute to Pasadena;
- vi. Gold Line fares are significantly lower than Metrolink fares;
- vii. Gold Line service is typically at regular 4 to 7 minute intervals all day long throughout each weekday, versus a varying schedule for Metrolink trains that can operate with 30 minute to one hour or greater arrival and departure intervals, with limited operating hours each day.

The City of Montclair also is compelled to ask a question regarding competition: So what? Generally, competition is considered healthy because it spurs innovation, superior service and products, a range of choices, and greater interest and purchasing momentum among members of the population acquiring the service or product. In other words, competition can end up creating a larger base of riders that may come to appreciate and enjoy the benefits of public transit and use the services on a frequent basis. However, for this outcome to be realized, transit must become an attractive product for users; i.e., connectivity and accessibility, with an array of choices that allow for integration into the larger mobility network that is emerging and capturing the interest of a commuting public, must be a part of its character.

It is noted that, in fact, an established mobility network and competition to public transit already exists. It exists in the form of personal choice to: drive a vehicle, walk, rideshare,

bicycle, take a bus or shuttle service, use ride-hailing or taxi services, tele-commute, use e-commerce, use public or private transit services, or otherwise make a choice that gives the consumer authority in the matter of commuting and using transit. In any event, there is no written rule or statute that publicly delivered transit service must be kept free of competition. Instead, the momentum is for connectivity and accessibility in transit and the widening of choices in a mobility-driven network.

Thus, the City of Montclair reiterates that the Gold Line and Metrolink are not competitors; instead, they offer completely different and complementary transit experiences that, with the exception of reaching, or seeking to reach, into service points that offer the highest level of connectivity and accessibility, serve distinctively different service areas; and that, alone, is justification for extending Gold Line service to the Montclair Transcenter.

It is worth noting again that there are many competing demands that influence transit ridership, and both Metrolink and the Gold Line must provide service within this mix of various alternatives. In that regard, then, the focus should be to enhance and promote each respective public transit service as an attractive alternative to their potential ridership base, and cooperate with cities along respective service routes to enhance the development of transit districts along rail corridors, expand the transit population base, and establish transit connectivity and accessibility to a larger mobility network.

To further reinforce the observation that Metrolink and Gold Line services should be considered complementary, the City of Montclair observes that in a letter to the Southern California Regional Rail Authority Board of Directors introducing the [Comprehensive Annual Financial Report \(CAFR\) of the Southern California Regional Rail Authority \(SCRRA\) for the fiscal year ended June 30, 2017](#), Chief Executive Officer Arthur T. Leahy and Chief Financial Officer Ronnie Campbell observe that:

*Southern California's growing transit needs provide an opportunity for additional rail services through the six counties served by Metrolink. Our new Southern California Optimized Rail Expansion (SCORE) plan responds to this growth opportunity with a series of transformative service recommendations to be implemented in 2023 and 2028.*

*Metrolink offers the only high speed, long-distance transit service to 2028 Summer Olympic venues located across the region, including Anaheim Honda Center for volleyball; Lake Perris for rowing and canoe sprints; Bonelli Regional Park in San Dimas for mountain biking; and the Sepulveda Dam for archery, equestrian riding and long-distance canoeing. SCRRA continues to plan for these exciting new growth opportunities with its federal, state and regional funding partners.*

It is recognized that comments made by Chief Executive Officer Leahy and Chief Financial Officer Campbell are intended to promote regional expansion of Metrolink services, and

not the services of other transit providers. In fact, Metrolink operates on an estimated 409 miles of unduplicated route miles out of 540 total route miles—a fact that points to a clear lack of any significant “competition” from, or integration with, other transit haulers. Nonetheless, the letter does note the need to expand transit services to meet “growing transit needs”. Achieving this objective goes beyond Metrolink. It requires a coordinated expansion of transit services, transit connectivity, and transit accessibility; and integration with a mobility network that meets the everyday needs of current and future transit riders.

It is further noted that despite a decade long decline in Metrolink boardings, the transit carrier establishes that a growing need does exist for expanding the present level of public transit service. Addressing that need is the objective of all transit service providers. In Southern California the Gold Line and other light rail carriers, Metrolink, bus companies, and Los Angeles’ expanding subway system are core components of a successful public transit system backbone designed to meet public transit needs. These transit services are mutually complementary, not mutually exclusive. However, the design of these respective systems must and should promote connectivity and accessibility to its most expansive level; i.e., expansion that incorporates a mobility network that works hand-in-hand with the strength of public transit—its backbone of trains and buses that bring large numbers of passengers to points of connection for access to the larger mobility network.

When Gold Line service extends to the Montclair Transcenter, it would run parallel for approximately 3 miles in a shared alignment with Metrolink. However, that achievement should not simply be framed as one of competition; rather, from the perspective of Gold Line riders and a successful public transit system, it is a necessary shared environment to allow the Gold Line to reach the only multi-modal transit center serving the east end of Los Angeles County and the west end of San Bernardino County for the purpose of expanding on connectivity and accessibility and strengthening the backbone of public transit. It is, after all, the objective of any truly great and enduring public transit system to establish connectivity and accessibility for the largest number of users, for the largest gain to society, and for the largest benefit to the environment.

Continued analysis on the matter of ridership impacts demonstrates that declines in boarding has been a trend for Metrolink over much of the past decade.

According to the [Southern California Regional Rail Authority Comprehensive Annual Financial Report For the Fiscal Years Ended June 30, 2017 & 2016](#), Metrolink has experienced a decline in ridership since Fiscal Year 2007-08, when it peaked at 12,680,973 annual boardings and declined nearly every year since. This decline is demonstrated in **Statistical Summary 1**, on the following page:

### Statistical Summary 1

- Fiscal Year 2007-09: 12,680,973
- Fiscal Year 2008-09: 12,241,830
- Fiscal Year 2009-10: 12,005,949
- Fiscal Year 2010-11: 11,270,214
- Fiscal Year 2011-12: 11,977,540
- Fiscal Year 2012-13: 12,075,388
- Fiscal Year 2013-14: 11,748,648
- Fiscal Year 2014-15: 11,823,612
- Fiscal Year 2015-16: 11,504,399
- Fiscal Year 2016-17: 11,640,269

**Statistical Summary 2**, below, reinforces the results in **Statistical Summary 1**, above, but demonstrates the decline as a drop in average weekday boardings:

### Statistical Summary 2

- Fiscal Year 2007-08: 47,210
- Fiscal Year 2008-09: 45,444
- Fiscal Year 2009-10: 44,390
- Fiscal Year 2010-11: 41,823
- Fiscal Year 2011-12: 42,388
- Fiscal Year 2012-13: 42,359
- Fiscal Year 2013-14: 42,180
- Fiscal Year 2014-15: 42,165
- Fiscal Year 2015-16: 41,186
- Fiscal Year 2016-17: 40,955

**Statistical Summary 3**, below, demonstrates that Metrolink's farebox recovery ratio—the ratio of fare revenue to direct operating expenses—for the same period also realized annual declines due to an overall decrease in passenger fares versus increases in direct operating expenses:

### Statistical Summary 3

- Fiscal Year 2007-08: 49.9%
- Fiscal Year 2008-09: 45.5%
- Fiscal Year 2009-10: 43.3%
- Fiscal Year 2010-11: 44.9%
- Fiscal Year 2011-12: 45.0%
- Fiscal Year 2012-13: 43.7%
- Fiscal Year 2013-14: 43.3%

- Fiscal Year 2014-15: 38.7%
- Fiscal Year 2015-16: 37.7%
- Fiscal Year 2016-17: 36.2%

A steady decline in ridership can be the product of any number of factors; however, **Statistical Summary 4**, below, appears to demonstrate that during the same ten-year period, “on-time performance was not a deterring factor, as Metrolink realized generally steady on-time performance, with only minor dips:

#### **Statistical Summary 4**

- Fiscal Year 2007-08: 96%
- Fiscal Year 2008-09: 94%
- Fiscal Year 2009-10: 93%
- Fiscal Year 2010-11: 95%
- Fiscal Year 2011-12: 95%
- Fiscal Year 2012-13: 95%
- Fiscal Year 2013-14: 94%
- Fiscal Year 2014-15: 93%
- Fiscal Year 2015-16: 88%
- Fiscal Year 2016-17: 94%

Despite declines in its farebox recovery ratio and ridership, **Statistical Summary 5**, below, demonstrates that total train miles actually increased over the same ten-year period, as Metrolink delivered more routes, new trains, new schedules and modifications to existing schedules. However, despite the apparent increase in total train miles, and in the face of declining ridership and a drop in its farebox recovery ratio, Metrolink was forced to reduce weekend service on the Inland Empire-Orange County and Orange County lines:

#### **Statistical Summary 5**

- Fiscal Year 2007-08: 2,489,787
- Fiscal Year 2008-09: 2,548,786
- Fiscal Year 2009-10: 2,520,801
- Fiscal Year 2010-11: 2,435,835
- Fiscal Year 2011-12: 2,647,347
- Fiscal Year 2012-13: 2,747,258
- Fiscal Year 2013-14: 2,774,110
- Fiscal Year 2014-15: 2,764,351
- Fiscal Year 2015-16: 2,755,653
- Fiscal Year 2016-17: 2,752,681

Along with its increase in total train miles, Metrolink also experienced a significant and steady increase in service hours over the same ten-year period, as indicated in **Statistical Summary 6**, below:

**Statistical Summary 6**

- Fiscal Year 2007-08: 63,136
- Fiscal Year 2008-09: 70,387
- Fiscal Year 2009-10: 69,912
- Fiscal Year 2010-11: 68,371
- Fiscal Year 2011-12: 74,611
- Fiscal Year 2012-13: 77,310
- Fiscal Year 2013-14: 78,658
- Fiscal Year 2014-15: 78,992
- Fiscal Year 2015-16: 80,125
- Fiscal Year 2016-17: 85,436

Despite its drop in its farebox recovery ratio, **Statistical Summary 7** demonstrates that Metrolink passenger fares actually enjoyed significant improvement over the past decade:

**Statistical Summary 7**

- Fiscal Year 2007-08: \$69,891,700
- Fiscal Year 2008-09: \$73,057,016
- Fiscal Year 2009-10: \$69,343,026
- Fiscal Year 2010-11: \$74,170,744
- Fiscal Year 2011-12: \$79,986,127
- Fiscal Year 2012-13: \$84,359,583
- Fiscal Year 2013-14: \$85,672,573
- Fiscal Year 2014-15: \$83,111,282
- Fiscal Year 2015-16: \$84,505,943
- Fiscal Year 2016-17: \$83,397,682

Based on statistical information extracted from the [Southern California Regional Rail Authority Comprehensive Annual Financial Report For the Fiscal Years Ended June 30, 2017 & 2016](#), there is no clear correlation between in Metrolink ridership declines and the presence or nearness of Gold Line light rail service to Metrolink’s San Bernardino Line; rather, Metrolink’s ridership decline is most likely tied to other factors—including factors that can only be addressed by making public transit a more attractive means for commuters to travel not just on the backbone of a public transit system, but on the vast mobility network that is taking shape in urban and suburban areas throughout the nation.

Thus, the City of Montclair maintains that Metrolink ridership is probably not declining for reasons attributed to the presence of Gold Line light rail service or other rail service. In fact, the reasons for decline are many and nuanced. While it is possible for “transit competition” to be a factor in ridership decline, the larger conclusion is that many other factors have greater impact. In any event, competition is an appreciated quality of American life, and public transit is not, nor should it be, protected from free-market forces; instead, public transit leaders must address the rapidly occurring changes in transit, and seek to accelerate connectivity, accessibility, and integration and involvement in the mobility network.

Public transit leaders must also reconcile to the following: (1) competition is a byproduct of consumerism, and (2) competition in the world of public transit cannot be distilled down to single or multiple transit competitors. Instead, competition comes in the form of lower gasoline prices, lower vehicle operating costs, availability of newer economical cars, transit service quality, farebox prices and fluctuations, availability of buses and rideshare/hailing services, bicycles, pedestrian travel, demographic shifts (including an aging population), changes and flexibility in work schedules and the locations where people perform their work, economic recessions, service reductions and many other factors. Competition is also the existing and expanding mobility network. Public transit leaders must either take the advantage and be leaders in this new transit environment, or allow their industry to be relegated to the same fate of the Pacific Electric Railway Company Red Cars when automobiles and a vast network of freeways became the standard for the Southern California commute.

In an environment that offers many emerging transit choices, it is clear that public transit planners can no longer seek comfort in attributing ridership decline to the existence or “threat” of a “competing” public transit service. Alternatively, the better recourse is to re-engineer service delivery and work with stakeholders to increase the potential transit ridership base.

In its Appendix, ["Development of Ridership Forecasts for the San Bernardino Infrastructure Improvement Study"](#), SBCTA ran various model alternatives that projected out ridership growth for the Metrolink San Bernardino Line. Using 2008 as its base year, the model for a “No Build Scenario” (Alternative A—the existence of the existing Metrolink San Bernardino Line without build-out), forecasts an increase from 10,600 boardings per day in 2008 to 15,875 in 2020. According to [Metrolink](#), current weekday ridership on the San Bernardino Line is 8,833, with Saturday ridership at 3,844 and Sunday ridership at 2,870—a significant difference in comparison to SBCTA’s projections.

Furthermore, under each subsequent alternative, up to Alternative F, daily boardings are projected to increase until they peak at 16,500 boardings a day—alternative F presumes a system build-out that includes the addition of multiple Express train sets, six additional trains, and completion of the Redlands Passenger Rail Project and the Downtown San Bernardino Passenger Rail Project.

It may be that current ridership for the Metrolink San Bernardino Line is significantly below current and projected expectations—a decline that certainly carries a high-level of concern for SBCTA and Metrolink—but the decline has been steady over the past decade, and precedes the completion of Gold Line light rail service to Azusa. Public transit service providers can take pause to reflect on both the number of cities planning transit districts along rail lines and the projected steady growth in population for the region, and use those gains to promote public transit in a way that encourages connectivity, accessibility and integration. Transit leaders should not, however, take solace in the ongoing belief that they are, or should be, the only public transit service provider in a complex and choice driven society—“That train”, as is often said, “has left the station.”

VII. Conclusion.

- a. The City of Montclair maintains that excluding the cities of Pomona and/or Claremont and Montclair from the Phase 2B Project harms the Gold Line extension and the public in the following ways:
  - i. Weakens the Project’s potential ability to achieve meaningful GHG reductions—reductions that would otherwise be achieved through a more expansive Phase 2B extension project to the City of Montclair;
  - ii. Fails to promote greater health benefits that would stem from improved regional air quality—improvements that would otherwise be achieved through a more expansive Phase 2B extension project to the City of Montclair;
  - iii. Fails to expand on meaningful transit connectivity, accessibility and integration into the larger mobility network—connectivity, accessibility and integration that would otherwise be achieved through a more expansive Phase 2B extension project to the City of Montclair;
  - iv. Fails to connect with disadvantaged communities, low-income communities, and/or low-income households in the cities of Pomona and Montclair—connections that would otherwise be achieved through a more expansive Phase 2B extension project to the City of Montclair;
  - v. Fails to promote significant public health improvements in disadvantaged communities, low-income communities and/or low-income households—public health improvements that may otherwise be achieved through a more expansive Phase 2B extension project to the City of Montclair;
  - vi. Fails to produce significant positive ridership growth and passenger mile increases—increases that would otherwise be achieved through a more expansive Phase 2B extension project to the City of Montclair;

- vii. Fails to significantly reduce vehicle miles travelled and the number of automobile trips that would otherwise be achieved through a more expansive Phase 2B extension project to the City of Montclair.
- viii. Fails to deliver a transit service project that could be used to promote significant construction of high-density housing development within one-half mile of rail stations and major transit centers—construction objectives that would otherwise be achieved through a more expansive Phase 2B extension project to the City of Montclair;
- ix. Fails to contribute to improvement of transit-served areas—improvements that may otherwise be achieved through a more expansive Phase 2B extension project to the City of Montclair;
- x. Fails to contribute in any significant way to the relocation of jobs and development of new housing and commerce in an around transit centers—development activities that would otherwise be achieved through a more expansive Phase 2B extension project to the City of Montclair;
- xi. Fails to produce the lower-carbon footprint stemming from the relocation of jobs and development of new housing and commerce in and around transit areas—development activities that would otherwise be achieved through a more expansive Phase 2B extension project to the City of Montclair;
- xii. Fails to achieve significant GHG emission reductions that may otherwise result from the creation of jobs, development of commerce and buildup of housing densities near and around transit centers—activities that may otherwise be achieved through a more expansive Phase 2B extension project to the City of Montclair;
- xiii. Fails to contribute to the acceleration of future phases of public transit and expanded connectivity and accessibility, including an extension of transit services to Ontario International Airport—transit expansion that may otherwise be achieved through a more expansive Phase 2B extension project to the City of Montclair;
- xiv. Fails to integrate across other modes of transportation such as connections with airports, bus terminals and other rail projects serving the region—connections that would otherwise be achieved through a more expansive Phase 2B extension project to the City of Montclair;
- xv. Fails to directly connect to a Metrolink-served multi-modal transit hub in the east end of Los Angeles County and west end of San Bernardino County for the

purpose of promoting expanded connectivity, accessibility, and integration with an emerging and growing mobility network for the betterment of transit service—connectivity that would otherwise be achieved through a more expansive Phase 2B extension project to the City of Montclair;

- xvi. Fails to enhance and/or promote connectivity, integration, and coordination with the state’s various transit systems including, but not limited to, local, regional and statewide transit systems including, potentially, the high-speed rail system—connectivity, integration and coordination that may otherwise be achieved through a more expansive Phase 2B extension project to the City of Montclair;
  - xvii. Fails to significantly promote active transportation accessibility to an important regional transit system—accessibility that would otherwise be achieved through extension of light rail service to the cities of Claremont and Montclair where transit service can connect directly with the Pacific Electric Bike Trail, Claremont’s extensive bicycle lanes, and a developing pedestrian- and bicycle-friendly transit district in Montclair.
  - xviii. Even if elements of the Phase 2B Project are separable or scalable, based on available funding, it appears that the primary and secondary requirements of the CalSTA guidelines for the approved TIRCP grant cannot fully be satisfied without inclusion of Pomona and/or Claremont and Montclair into the Phase 2B Project.
- b. Since the early 2000s, the City of Montclair has served as a central partner and voice in advocating for extension of Gold Line light rail service from Glendora to Montclair:
- i. In 2012, Montclair Mayor Paul M. Eaton took an advocacy role on behalf of the Gold Line when San Bernardino Associated Governments (SanBAG, now SBCTA) moved to strike the Montclair Segment of the Gold Line Phase 2B project from its list of priority transit projects as defined in Measure I and its Expenditure Plan for the San Bernardino County Valley Sub-region. Through Mayor Eaton’s intervention and invoking the provisions of Measure I, the SanBAG Board of Directors correctly maintained the Montclair Segment as a Measure I priority transit project.
  - ii. In 2014, the Montclair City Council authorized advancing up to \$3 million to ensure that the Montclair Segment (Los Angeles County-San Bernardino County line to Montclair Transcenter ) of the Gold Line Phase 2B project (Glendora to Montclair) was included in the advanced engineering and environmental consulting work being completed by the Construction Authority for the Phase 2B Project. The Montclair City Council took this action after the San Bernardino County Transportation Authority (SBCTA) refused to pay its share of the cost of the engineering and environmental work for the Gold Line extension. The City of Montclair entered into separate agreements with (1) the Construction Authority

for payment of project invoices, and (2) SBCTA for reimbursement to Montclair in the event Measure M was approved by Los Angeles County voters.

- iii. In 2014, the City of Montclair formally joined and became a voting member of the Gold Line Foothill Construction Authority Joint Powers Authority.
- c. Based on the totality of the City of Montclair’s commitment to the Gold Line extension project, the Montclair City Council respectfully requests that the Construction Authority Board of Directors reconsider its decision to split the project into multiple procurement phases and immediately move to use existing local funds as a local match to apply for federal transit-related grant funds (or other federal or state grants or funds) to complete construction of the Gold Line extension from Glendora to the Montclair Transcenter.
- d. Failing to take the recommended action in paragraph “VII.c.”, above, the Montclair City Council respectfully requests that the Construction Authority Board of Directors move as quickly as possible to ascertain available funding for the second phase of a split Phase 2B procurement from La Verne to Montclair or Pomona to Montclair, and use these funds as a local match to apply for federal transit-related grant funds (or other federal or state grant funds) to complete construction of the Gold Line extension to the City of Montclair Transcenter.

The City of Montclair cautions, however, that in light of trending economic conditions, splitting the Phase 2B Project into multiple procurements is likely to result in even higher cost estimates for each phase of split procurement, further harming the ability of the Construction Authority to construct separate procurements of the projects, and putting subsequent procurements further beyond the ability of the Construction Authority to construct and achieve its mandate under AB 1600.

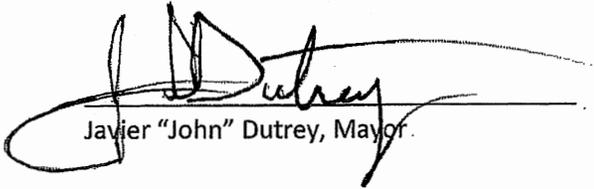
- e. Finally, the Montclair City Council respectfully disagrees with the positions and arguments taken by SBCTA in its letter to the Construction Authority dated on or about December 21, 2018, and asks that the Construction Authority deem extension of Gold Line light rail service from the City of Glendora to the City of Montclair as essential to the future of public transit in the region, and that only by expanding on connectivity and accessibility can public transit securely promote its long-term survivability and its ability to integrate with the expanding mobility network that is shaping the future of transit, nationally.

SIGNATURE APPROVALS OF THIS DOCUMENT, ***CITY OF MONTCLAIR FORMAL RESPONSE TO THE SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT—GOLD LINE PHASE 2B PROCUREMENT, DATED JANUARY 3, 2019***, BY THE MONTCLAIR CITY COUNCIL ARE PROVIDED ON THE FOLLOWING PAGE.

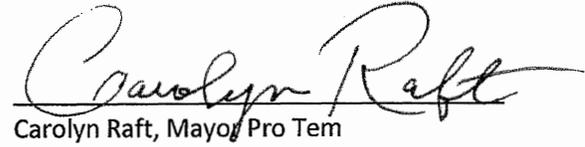
Respectfully Submitted,

CITY OF MONTCLAIR, CALIFORNIA

MONTCLAIR CITY COUNCIL:



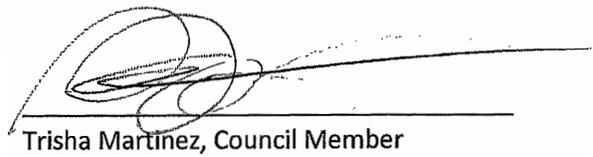
Javier "John" Dutrey, Mayor



Carolyn Raft, Mayor Pro Tem



Bill Ruh, Council Member



Trisha Martinez, Council Member