

Garcetti

DECLARATION OF PHILLIP A. WASHINGTON

EXHIBIT B



March 7, 2016

Honorable George H. Wu
United States District Court
312 N. Spring Street
Los Angeles, CA 90012

Dear Judge Wu:

We are writing in our capacities as elected representatives in the greater Los Angeles community. With National Environmental Policy Act (NEPA) litigation concerning Metro's Westside Purple Line Extension (WPLE) before your court, we are compelled to offer background information separate and apart from the legal arguments being made. While remedies will be proscribed based on established legal principles, we ask that the designated remedies not delay the project and that the tangible effects of available remedial measures receive consideration.

In 2008 Los Angeles County voters passed Measure R, a thirty-year half-cent sales tax designed to fund highway improvements, municipal transportation priorities, and twelve major transit projects which collectively carry the promise of providing a comprehensive transit network as an alternative for Los Angeles residents stuck in traffic. The WPLE is among the highest profile of these projects based on budget size, scope, complexity, and its potential to effectively link the job centers, cultural institutions, and residents of West Los Angeles with the rest of the county.

Formally entitled the Traffic Relief and Rail Expansion Ordinance, Measure R's chief priority is to reduce road congestion in the region—the WPLE promises significant benefits in this regard for the county. When completed, the WPLE will provide a twenty-five minute ride between Downtown Los Angeles and Westwood; the same trip regularly takes more than an hour in rush-hour traffic. With more than 49,000 daily boardings expected at the seven new stations included in the WPLE, the project is poised to significantly blunt the anticipated increase in congestion while also reducing energy consumption and improving air quality.

The WPLE is expected to create 65,500 jobs, but that statistic alone doesn't do justice to the role this rail line will play in the Los Angeles employment landscape. Sections 2 and 3 of the Purple Line include stops in Beverly Hills, Century City, Westwood and the U.S. Department of Veterans Affairs' (VA) Greater Los Angeles Campus, all major destinations for employment, shopping, culture, education, and health care. Taken together, this area has the second densest concentration of jobs in Southern California after Downtown Los Angeles. With station stops located in these important centers, the WPLE will bring more Angelenos to their destinations more swiftly and efficiently than current options allow.

The WPLE will provide workers an easier commute by reducing congestion, and it will also stitch together different communities within the region through fast, reliable, transportation. When the 9-mile extension is complete it will link Downtown Los Angeles and Koreatown to the Miracle Mile and its many museums and cultural attractions and West Los Angeles. The planned terminus of the WPLE at the VA's Greater Los Angeles Campus is included in the recently released Master Plan undertaken by the VA re-envisioning the campus to fulfill their mission of better serving veterans. Metro and the VA are continuing to work cooperatively on the details of incorporating this WPLE station in the future of the campus. Any delay to earlier sections of the project will delay its benefits for those needing to travel to these destinations for work, school, medical services, and other needs.

A court decision to reopen or vacate the Record of Decision (ROD) for the WPLE may compromise the flow of more than \$2 billion in federal transportation funding made possible through New Starts funding (Section 5309) - as authorized by the FAST Act that was recently adopted by Congress and signed into law by the President late last year. Specifically, reopening or vacating the ROD may serve to delay an anticipated (Summer 2016) \$1.2 billion Full Funding Grant Agreement for Section 2 of the WPLE and also serve to block ongoing efforts with the Federal Government to accelerate construction of Section 3 of the WPLE - which is needed to strengthen the City of Los Angeles' bid to host the 2024 Olympic Games. Like Section 2, Section 3 of the WPLE (Century City to West LA VA) anticipates securing more than \$1 billion in federal New Starts funding.

Added uncertainty in funding could have an adverse effect on the procurement process as Metro seeks a contractor to build Section 2 of the WPLE. With the procurement for Section 2 of the WPLE currently out for bid, the effects of potential remedies range from contractors increasing their bids (to account for uncertainty associated with available funds and material changes to the procurement documents) to delay or cancellation of the procurement itself, the consequences of which include delaying the project delivery date and jeopardizing its functionality for regional priorities such as hosting the 2024 Olympic Games.

As local leaders and stakeholders, we appreciate how our communities are protected by NEPA and the California Environmental Quality Act (CEQA). While ensuring compliance with federal environmental law is essential as we plan for the future of our city, county, and region, it is of the utmost importance that minor shortcomings not cause undue delay to the project schedule, render efforts to accelerate the project unviable, and result in higher costs for taxpayers. We encourage you to consider these regional priorities and tangible effects as you determine the proper remedy in the NEPA case before you.

Sincerely,



Mark Ridley-Thomas
Los Angeles County Supervisor
Metro Board Chair



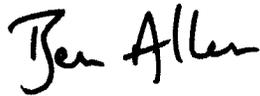
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Los Angeles Mayor
2nd Vice Chair, Metro
Board



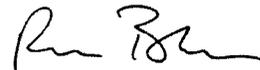
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