



February 13, 2012

Jacob Lieb  
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818 West Seventh Street, 12<sup>th</sup> Floor  
Los Angeles, California 90017-3435

via electronic mail to [lieb@scag.ca.gov](mailto:lieb@scag.ca.gov)

**Re: Comments on 2012-2035 Regional Transportation Plan / Sustainable Communities Strategy and Draft Program Environmental Impact Report**

Dear Mr. Lieb:

The City of Burbank has reviewed the Draft 2012-2035 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) and the related Draft Program Environmental Impact Report (PEIR) and respectfully submits the following comments. The Burbank City Council reviewed and endorsed the content of this letter at its February 7, 2012 meeting.

**Aviation Forecast**

The City of Burbank has submitted comments on prior RTPs regarding the aviation forecast. As we have asserted in prior years, the City of Burbank continues to believe that the forecast of 9.4 million annual passengers (MAP) for the Bob Hope Airport is unreasonably high. Two of the primary constraints to passenger volume at the Airport are the number of passenger gates and the capacity of streets serving the Airport. The City believes that neither the existing streets nor the existing 14 gate terminal building could accommodate 9.4 MAP. The City and Airport Authority are engaging in a joint public outreach process to discuss the future of the airport, which may include a new terminal building. However, it is unlikely that anything other than a replacement terminal with the same number of passenger gates as the current terminal would be acceptable to the residents of Burbank who must ultimately vote on whether to approve any new terminal facility.

Based on the passenger volume trend since the airport opened in 1930, the City Council and City staff believe that 8.0 MAP is a more reasonable number for 2035. The City is using this number in our own forecasts, including our 2035 General Plan update and related EIR. This number is also consistent with the Airport Authority's own passenger forecast.

**Transportation Projects**

**Project Funding**

The 2012 RTP Financial Plan identifies two broad categories of revenue sources to fund projects identified in the plan. Core revenues, in the amount of \$305 billion, are identified as committed or historically-available funding across the six-county region. Reasonably-available revenues, in the

amount of an additional \$226 billion, are identified as new transportation funding likely to materialize during the plan period. These additional funds include revenues from adjustments to state and federal gas taxes, vehicle-miles-traveled user fees, tolling, private funding, and freight fees.

The plan assumes that these reasonably-available revenues will materialize to fund projects in the RTP Financially-Constrained Plan and are necessary to meet the region's greenhouse gas and air quality reduction mandates. However, many of these reasonably-available funding sources may in fact not materialize, especially given the controversial nature of some of the proposals. In particular, it may not be prudent to expect that VMT or mileage-based fees are politically feasible to implement, especially if these types of funding sources are relied upon to implement necessary projects in the Financially Constrained Plan. Further, the City is unaware of any VMT fee proposal being currently discussed at the regional or state level.

The City believes that SCAG should consider an alternative in the PEIR that does not assume the reasonably-available revenues identified in the current draft become available during the plan period. This alternative would then modify the list of projects to include only those that are funded under the core revenues and assess the air quality and greenhouse gas impacts from this reduced plan. The City especially notes the significant uncertainty related to funding of the California High Speed Rail system.

#### Local Transit Service

The Transit and Rail policies in Section 2 - Transportation Investments, include emphasis on encouraging local transit operators to expand local transit services to serve as neighborhood circulators and "last-mile" transit connections between regional transit systems and major residential and employment centers. The City supports policies to encourage expansion of local transit service; however, the plan does not address the significant difficulty local agencies currently have in funding these types of services with the operating funds currently available to local jurisdictions within the region. The Plan should more specifically identify the additional funding necessary to implement expanded local transit, and should bolster policies and objectives that expand the availability of operations funding to local transit agencies.

#### Regional Transit Projects

The City believes that there are a number of regional transit projects in the Arroyo Verdugo Cities subregion of Los Angeles County that should be included in the 2012 RTP, especially if additional funding sources are identified over the next 25 years. These projects are identified in other long-range planning documents and, specifically, are called out in Metro's Long Range Transportation Plan adopted in 2009 as "Strategic Unfunded Projects." These important projects would improve transit mobility in and around the Arroyo Verdugo Cities region, and would especially improve east-west travel between the San Fernando and San Gabriel Valleys. The City believes that the following projects should be considered for implementation using additional reasonably-available funding sources as described in the Financial Plan:

- a. Regional transit connection between the North Hollywood Red Line / Orange Line Station and the Gold Line in Pasadena via Burbank and Glendale
- b. Extension of the Orange Line and/or Red Line to Bob Hope Airport
- c. Bus Rapid Transit (BRT) or other regional transit connection between Downtown Burbank and Hollywood via Universal City.

- d. Burbank-Glendale Light Rail (implemented as light rail, BRT, heavy-rail DMU, or other technology)

#### High Speed Rail

The plan identifies the California High Speed Rail system as influencing regional and intercity travel in the SCAG region, but does not specifically identify how this planned transportation improvement will integrate with regional and local systems. Integration of any intercity transit system with existing and planned transit services is critical to ensuring the effectiveness of this major transportation investment. The 2012 RTP should include stronger policies that support development of regional and local connections to High Speed Rail, including identification of future regional projects and funding needs that support High Speed Rail connections to the local network.

#### Land Use Policies

Regarding the variety of land use policies discussed in the RTP/SCS, the City provides a general comment that for these policies to be effective, land use control must remain at the local level. The RTP/SCS provides blanket policies that apply generally to the entire SCAG region and may not be appropriate in every situation. For example, the RTP/SCS associates Transit Oriented Development with higher residential densities and multifamily or mixed-use housing products. However, the City of Burbank contains many single family residential neighborhoods that are located within walking distance of transit centers and corridors, and within walking distance of commercial districts. The City is pleased that the RTP/SCS was developed based on existing local General Plans and local input, and that cities will continue to have sole authority over local land use decisions.

The City of Burbank appreciates the opportunity to comment on the RTP/SCS and PEIR and looks forward to continuing to work with SCAG on the issues addressed herein.

Sincerely,  
Community Development Department



Michael D. Forbes  
Assistant Community Development Director / City Planner

cc: Honorable Mayor and Members of the City Council  
Michael Flad, City Manager  
Amy Albano, City Attorney