



February 14, 2012

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Transmitted via Email to [lieb@SCAG.ca.ca.gov](mailto:lieb@SCAG.ca.ca.gov)

Re: Draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Program Environmental Impact Report (PEIR).

Dear Mr. Lieb:

The City of Glendale respectfully submits the following comments on the Draft 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and Program Environmental Impact Report (PEIR).

1. Under the Transit and Rail policies the RTP encourages local transit operators to expand and provide connections to planned rail and regional transit services as well as the major employment centers. While the City of Glendale supports such a policy, the plan fails to recognize the additional funding that will be necessary to fund such services by local agencies. Local transit operators currently provide key connection to the existing commuter rail, light rail, and BRT services using local transit funds. Any further expansion of these services although important in improving mobility, will create a hardship on local agencies.
2. Under Los Angeles Metro's 2009 Long Range Plan, the following projects were included as "Strategic Unfunded Projects":
  - a. Extension of the Orange line and Red Line to Bob Hope Airport.
  - b. East-West Connector between North Hollywood Red Line/Orange Line and the Pasadena Gold Line via Burbank and Glendale to provide a "missing link" between San Fernando Valley and San Gabriel valley.
  - c. Burbank – Glendale Light rail to Union Station or expansion/enhancement of the Metrolink service.

The above key transit projects should also be considered for implementation by using the "reasonably-available" revenues similar to RTP Financially Constrained Plan.

3. The California High Speed Rail (CHSR) in the RTP is included as currently being planned. However, the RTP fails to again address the impact of such a system on the local transit system such as the Beeline Service and the lack of funding for service connections to the High Speed Rail stations. Considering the tremendous capital and operating cost of the CHSR, we recommend implementation of alternatives such as increasing interregional connectivity of the existing systems (commuter rail, light rail and bus rapid transit) to improve mobility in the sub-regions at a lower cost and more immediate before the CHSR is constructed.
4. The RTP only allocates a little more than 1% of the funding to Active Transportation. We believe that that SCAG should consider increasing the funding for Active Transportation to between 5%-8% of the total funding in the RTP.

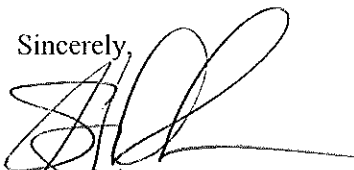
5. The 2012 RTP Financial Plan assumes that the “core revenues” and the “reasonably- available revenues” will fund the RTP’s Financially Constrained Plan. The following are key issues that need to be addressed in the Financial Plan:
  - a. As stated above, there are no provisions for funding local transit services as a result of planned expansion of rail and commuter services.
  - b. The “reasonably-available revenues” category in the amount of 226 billion dollars is in our opinion optimistic as to the possible adjustment to state and federal gas taxes, revenues from TOLL roads, and freight fees. There are no details about the controversial “vehicle mile user fees” that regional and local agencies have to enact to raise funding.
  - c. Highway projects are front loaded as they are easiest to finance in comparison to transit projects by borrowing against future toll revenues. Highway project increase in Vehicle Miles Traveled (VMT) consequently raises compliance issues with SB375 to reduce greenhouse gas emissions. It is our recommendation that transit (bus and rail), bicycle and pedestrian projects take priority over highway projects as they can improve mobility and reduce emissions as well.
  - d. It is recommended that the RTP/SCS Financial Plan include a full benefit/cost ration analysis and a Performance Criteria for major highway and rail projects contained in the “Constrained Financial” Plan.

Overall, we are concerned that the RTP’s assumption regarding the “reasonably- available revenues” is optimistic and the PEIR should consider alternatives in the draft plan that identifies only projects that can be funded as part of the “core revenues” to make the plan more realistic with priority given to transit projects.

Lastly, as cited on p. 3.12-25 of the DEIR , “Locally-developed county transportation plans have identified projects to close these (highway network) gaps and complete the system , and they are included in the Plan .These projects include ...the SR710 Gap Closure in Los Angeles County...”. The position of the City of Glendale remains consistent with Resolution No. 09-111 approved by the Glendale City Council on July 28, 2009, which addresses both the tunnel “gap closure” alternative as well as the general subject of “gap closure” alternatives for the SR-710 freeway between the I-10 and SR-134/I-210 freeways. On behalf of City Council and the citizens of Glendale, I wish to reiterate our opposition to any “gap closure” alternative that has or could be developed. In addition, I wish to express our opposition to the continued effort and expenditure of tax-payer monies in exploring, studying, and developing any means to facilitate this “gap closure”. It is Glendale’s belief and desire that efforts instead be directed to the development of alternatives that more effectively and more thoroughly address the concerns of mobility, congestion, and the movement of goods in the SR-710 corridor, particularly from our ports. Such alternatives should expand mass transit systems, improve existing infrastructure, and limit the long-distance movement of cargo/freight from the ports to rail. The City of Glendale has opposed this project and recommends the development of a multi-modal solution in lieu of further consideration of this project.

The City of Glendale looks forward to working with SCAG to address issues listed above. We appreciate the opportunity to comment on the RTP/SCS and the PEIR.

Sincerely,



Scott Ochoa  
City Manager