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REVISED

**PLANNING AND PROGRAMMING COMMITTEE
JANUARY 16, 2008**

**SUBJECT: COMMENTS ON SCAG DRAFT 2008 REGIONAL
TRANSPORTATION PLAN**

**ACTION: APPROVE METRO COMMENT LETTER ON THE DRAFT 2008
REGIONAL TRANSPORTATION PLAN**

RECOMMENDATION

Approve for release comments on the Southern California Association of Governments' (SCAG) Draft Regional Transportation Plan (RTP).

ISSUE

In December 2007, SCAG released the Draft 2008 RTP for public comment. The RTP identifies regional transportation priorities for the six-county region through 2035.

POLICY IMPLICATIONS

All our projects and priorities must be included in SCAG's RTP to be eligible for federal funds. Conversely, any projects in Los Angeles County that are included in the RTP that are not supported by us are also eligible for federal funding and if included in the RTP may be required for air quality conformity purposes. Projects required for air quality conformity purposes must be implemented unless substituted with projects of equal air quality benefit.

OPTIONS

The Board can approve the release of the comment letter, modify the comment letter, or choose not to release a formal comment letter.

FINANCIAL IMPACT

The RTP identifies a ~~\$569~~ ~~\$545~~ billion transportation program for the six-county area through 2035, consisting of \$413 billion in traditional revenue sources and ~~\$156~~ ~~\$132~~ billion in revenue increases or innovative financing strategies. Los Angeles County is assumed to generate \$231.7 billion in traditional revenue sources through 2035.

BACKGROUND

In early December 2007, SCAG released its Draft 2008 RTP for public review. Comments are due by February 18, 2008. Attached for the Board's consideration is a draft letter of comment on the Draft RTP.

In general, the draft RTP is a well written document that properly identifies many of the key transportation issues that the region is facing. One of the most significant differences between the Draft 2008 RTP and our adopted 2001 Long Range Transportation Plan (LRTP), is that many new transportation projects have been proposed in the RTP for Los Angeles County that are beyond revenues that we assume to be available from traditional sources. SCAG is assuming that these projects are funded with a combination of traditional funding, innovative funding (e.g., container fees and public private partnerships), revenue increases (e.g., SCAG is assuming a 10 cent increase in the state gas tax and a 10 cent increase in the federal gas tax), and traditional funds between 2030 and 2035 that have no Board commitments. These projects include the following:

- I-710 Truck Lanes between ports and SR-60
- I-710 Tunnel from I-10 to I-210
- High Desert Corridor connecting LA and San Bernardino
- I-5 Carpool and Truck Climbing Lanes in Santa Clarita
- I-5 Carpool Lanes from SR 19 (Rosemead Blvd) to I-710
- ~~US-101 High Occupancy Toll Lanes from SR-23 to SR-170~~
- Regional Connector
- Green Line LRTP Extension
- Gold Line Extension to Montclair
- Purple Line Extension to Western and La Cienega
- High Speed Rail System
- Rail Capacity Improvements (Tier 4 engines, grade separations, capacity improvements)
- Orangeline Maglev Project in Southeastern Los Angeles County and Orange County

Many of the above projects are included in our 2001 Strategic Plan. Staff will work with SCAG to reconcile financial forecasts between the two agencies, and to determine if these projects assume new funding commitments from traditional funding sources. If any of the projects are removed from the Draft 2008 RTP, they would not be eligible for preliminary engineering or environmental analysis in accordance with Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU).

SCAG plans to adopt a final RTP in March or April of 2008. Metro is scheduled to release its draft LRTP in March 2008 and adopt the final LRTP in June 2008. Since the adoption of the LRTP will be after the adoption of the RTP, staff will coordinate closely with SCAG staff throughout the LRTP development and review process. If there is any conflict in projects or project schedules between the final LRTP and final RTP, SCAG could amend their RTP to incorporate any necessary changes after our LRTP is adopted. There is precedent for amending the RTP. The SCAG 2004 RTP was recently amended to incorporate the CMIA projects from the state bond initiative.


NEXT STEPS

Upon Board approval, our comments will be transmitted to SCAG for their consideration in developing their final 2008 RTP. SCAG is scheduled to adopt their final 2008 RTP at their March or April Regional Council meeting.

Prepared By: Brad McAllester, Executive Officer
Long Range Planning & Coordination

ATTACHMENTS

- A. Draft comment letter on SCAG Draft 2008 RTP



Carol Inge
Chief Planning Officer



Roger Snoble
Chief Executive Officer

Attachment A
Draft Comment Letter on SCAG Draft 2008 RTP

January 24, 2008

Hasan Ikhata, Executive Director
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017-3435

Dear Mr. Ikhata:

Thank you for the opportunity to comment on the Southern California Association of Governments' (SCAG) Draft 2008 Regional Transportation Plan (RTP). We would like to compliment SCAG on the inclusive process that was undertaken to develop the draft RTP. In general, we find the document to be well written in identifying many of the key challenges facing our region through 2035. The Metro Board has approved the following comments at their January 24th meeting, and requests that they be addressed in developing the final 2008 RTP.

1. In January, the Metro Board was briefed on preliminary recommendations for Metro's draft 2008 LRTP. That briefing included a presentation on our updated financial model, which has been revised to reflect expected increases in project construction costs as well as the impact of the State funding shortfall. SCAG should be aware that Metro does not anticipate adding any new projects in the draft 2008 LRTP and the schedule of some existing projects may be impacted. Metro's planning staff will coordinate with SCAG planning staff and provide you with our latest financial assumptions, as well as project, cost, and scheduling assumptions.
2. The draft 2008 LRTP identifies various projects that have not been approved by the Metro Board through the 2001 LRTP. We note that Metro anticipates releasing its draft 2008 LRTP in March 2008 and adopting a final 2008 LRTP in June 2008. As a result, SCAG should be aware that it may need to amend its RTP to reflect Metro's adopted LRTP as some future point. We note that there is precedent for such amendments, as the 2004 RTP was recently amended to incorporate CMIA projects funded through the State Bond. Projects not included in Metro's Constrained LRTP to date include the following:
 - I-710 Truck Lanes between ports and SR-60
 - I-710 Tunnel from I-10 to I-210

- High Desert Corridor connecting LA and San Bernardino
 - I-5 Carpool and Truck Climbing Lanes in Santa Clarita
 - I-5 Carpool Lanes from SR 19 (Rosemead Blvd) to I-710
 - ~~US 101 High Occupancy Toll Lanes from SR-23 to SR-170~~
 - Regional Connector
 - Green Line LRTP Extension
 - Gold Line Extension to Montclair
 - Purple Line Extension to Western and La Cienega
 - High Speed Rail System
 - Rail Capacity Improvements (Tier 4 engines, grade separations, capacity improvements)
 - Orangeline Maglev Project in Southeastern Los Angeles County and Orange County
3. Through the review and adoption of the Air Plan, Metro provided comments regarding rail electrification and Tier 4 locomotives, which were assumed to be funded and implemented by 2014. Metro expressed its concern as to whether these programs could be accomplished by that deadline. SCAG should clarify whether these proposals are still included in the draft RTP. We remain concerned that SCAG not commit to these strategies or others, that cannot realistically be attained on schedule and would put the region at risk for air quality sanctions and the loss of federal transportation dollars.
 4. We have reviewed SCAG's demographic forecast for Los Angeles County and have noted that population and employment is decreasing in comparison to the 2004 RTP, in various corridors where major transit facilities are planned. We are concerned that these reductions are not consistent with SCAG's stated goal to encourage development along transit corridors, and we would seek revisions to growth forecasted for these corridors.
 5. It is our understanding that SCAG did not include its MAGLEV proposal in its air quality conformity analysis and that conformity was attained without this project. This is consistent with the 2004 RTP, which listed the MAGLEV in its constrained program but did not assume air quality credit for it. We recommend that this practice be continued for the 2008 RTP. We would also like to see the RTP

confirm that this project is fully funded through private funds, and that Metro has no financial obligation.

6. We will work with SCAG staff to ensure that SCAG is aware of our LRTP schedules for Los Angeles County transportation projects. It is important for air quality conformity purposes that the RTP project schedules to be consistent with Metro's project schedules. We need to avoid the need to go through the air quality substitution process that happened to Metro on the Red Line and to OCTA on the Centerline project.
7. Attached to this letter are additional comments on specific elements of the draft RTP.

Thank you for the opportunity to comment on the draft RTP. Metro looks forward to working with SCAG in addressing these comments. If you have any questions, please contact Brad McAllester at 213-922-2914.

Sincerely,

Roger Snoble
Chief Executive Officer

ADDITIONAL COMMENTS ON DRAFT 2008 RTP

- Page 13, SCAG states that an additional \$10B is needed for arterial and transit related system preservation needs through 2035 (27years from now). Metro's latest survey includes an unfunded backlog of \$9.9 B for Los Angeles County for every road and type of system preservation – 3R, Maintenance for Arterials and Local Streets. System preservation needs for arterials are estimated at approximately \$5.4 B for arterials comprised of:

\$1.2 B for Arterial 3R unmet backlog

\$2.8 B for annual Arterial 3r unmet cost to maintain backlog for 27 years

\$0.167B of unmet maintenance backlog

\$1.2B for annual Arterial maintenance Unmet cost to maintain for 27 years.

There is another \$4 5.5B of system preservation needs on local streets (maintenance and 3R).

- Projects in the Pipeline (p. 95): 5/14 HOV connector will be in construction shortly, and others such as 5/170, 57/60, 405/605, etc. are not even in the strategic element of our LRTP. In addition, I-405 HOV gap closure in the Westside of LA (1st bullet), I-5 and SR-14 (3rd bullet), I-5 and I-605 (4th bullet), I-10 and SR-60 (5th bullet) and US-101 (7th bullet) are all too broad and are in need of better clarification.
- The RTP references a Major Corridor Study that has been completed for SR-60. Metro is not aware of this Study. The Multi-County Goods Movement Action Plan (MCGMAP) considered preliminary criteria and conducted modeling to identify an East/West freight corridor. The final recommendation of the MCGMAP, however, is that further analysis of parallel East/West corridors needs to take place with consideration given to both alternative technologies and potential East/West non-freeways corridors.
- Metro is pleased to see SCAG's inclusion of alternative technology methods for moving goods.