



CITY OF SOUTH PASADENA

OFFICE OF THE MAYOR

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May 7, 2008

Members of the Regional Council
Members of the Transportation and Communications Committee
Southern California Association of Governments
818 West Seventh Street, 12th Floor
Los Angeles, CA 90017

Re: Final Comment on Regional Transportation Plan (RTP):
Action Requested at Transportation and Communications
Committee and Council, May 8, 2008

Honorable Members of the Council and Committee:

The City of South Pasadena has reviewed the responses of Southern California Association of Governments (SCAG) to our comments on the RTP, and in light of those comments requests that SCAG take action to identify the Route 710 Tunnel Extension as a strategic rather than constrained project.

At the same time as your meeting in Ontario on May 8, our full City Council will be hosting its annual meeting with our Los Angeles County Supervisor Michael Antonovich, a meeting that has been set for months. That explains why I cannot attend your transportation and communications committee and full council meeting that morning. Nonetheless a member of our city staff will be present to support the requests of South Pasadena and our neighbor cities Pasadena and La Canada-Flintridge.

South Pasadena Support for Substitution of 710 Tunnel for Surface Route in the RTP

South Pasadena appreciates the SCAG response to our comment, confirming that the RTP includes the 710 project "as a tunnel as opposed to surface freeway." (2008 RTP Comments and Responses, p. 138.) We also appreciate the response that an RTIP item (project 2009) exists only "for property management along the potential future 710 corridor," and not for freeway construction. (*Ibid.*) These confirmations assure South Pasadena that the relevant Metropolitan Planning Organization RTP will no longer list or rely on a surface freeway, relieving our city of a long-standing threat.

At the same time, South Pasadena does not oppose sound research of a bored tunnel alternative for state route 710, provided that the study remains “route neutral” in fulfilling a proper purpose and need. For that reason, in light of the SCAG responses quoted in the paragraph above, South Pasadena supports the inclusion of the 710 tunnel project within the Strategic Plan portion of the RTP.

*South Pasadena Requests that the 710 Tunnel Be Placed in the Strategic Plan,
as Federal Law Requires*

We firmly disagree with the SCAG response to our request, which without sufficient evidence simply concludes, “SCAG establishes that the new funding sources identified for the SR-710 Tunnel are reasonably available.” (2008 RTP Comments and Responses, p. 138.) South Pasadena established in its comments of February 19, 2008 that within the meaning of 23 C.F.R. part 450, funding sources for the tunnel cannot be deemed reasonably available. South Pasadena’s position is now confirmed by the subsequent, authoritative, conclusions of the Metropolitan Transportation Authority (METRO) and the Southern California Air Quality Management District (SCAQMD).

In its draft Long Range Transportation Plan, METRO concludes that the 710 project, with untested assumptions about presently nonexistent funds from “fees, public/private partnerships, or tolls” can only stand in the “strategic unfunded” plan together with other similar projects “as candidates for additional study or funding in the long term.” (Draft METRO LRTP, pp. 31-32.) Because METRO can only describe the 710 project as a candidate for long term funding, SCAG must honor that judgment and also place 710 in its strategic unfunded plan.

Similarly, SCAQMD also questions the RTP’s erroneous inclusion of remote projects in the constrained plan. As stated in the SCAQMD comment on the draft RTP:

The conformity determination includes projects that do not show full funding. *According to federal guidelines, all projects included in the conformity analysis must show reasonable funding for the duration of the project life*, i.e. Caltrans Rte. 5 HOV/Truck lanes project which has approx. \$500,000 of committed funding – this is a \$400 billion project; High Desert Corridor Toll Project has been identified as requiring a joint public/private partnership, needing some type of funding commitments. If the RTP is not accepted and subsequently approved with the above types of projects modeled, is there a contingency plan with alternative projects which can be funded with the current funding sources that are committed and available?

(2008 RTP Comments and Responses, p. 137 (emphasis added).)

Finally, the City of Pasadena observes that the 710 project “continues to be a sensitive topic among our elected officials, neighborhood groups, and city residents”; that the project has been subject only to a preliminary feasibility assessment and remains subject to more ongoing studies; and concludes by asking that “the RTP recognize the ongoing studies for this facility and not presuppose the ongoing studies by defining a route for the 710 gap closure project.” (2008 RTP Comments and Responses, p. 116.)

In sum, the 710 project is one whose technical feasibility has not been established, one whose route has not even been determined, and one that has not been subject to any formal environmental assessment. In contrast, the Gold Line Phase II extension to Montclair is properly categorized in the constrained plan, because it is a defined project on a fixed route, its right of way has been acquired, its environmental assessment is complete, and it enjoys universal acceptance and support.

South Pasadena agrees with the San Gabriel Valley Council of Governments that high priority projects not be jeopardized by inclusion in the wrong category. (2008 RTP Comments and Responses, p. 126.) As between the Gold Line Phase II and route 710 tunnel, South Pasadena agrees with SGVCOG that the Gold Line is properly listed in the SCAG RTP as a constrained project, and that METRO should so include it in its LRTP as well; no one questions that premise. The 710 project, with support and funding far more conjectural, cannot be deemed one likely to be constructed within the year 2020 timeframe of the RTP, and should be listed as “strategic unfunded” in the RTP as now listed in the LRTP.

Conclusion

South Pasadena joins its Assembly Member Anthony Portantino, and neighboring cities Pasadena and La Canada-Flintridge, in supporting inclusion of the 710 tunnel project in the RTP, but insisting that the project be listed as “strategic unfunded.” Revising the RTP accordingly will ensure the integrity and internal consistency of the plan, eliminating the concerns of METRO, SCAQMD, and the most affected communities in the San Gabriel Valley.

Respectfully,

A handwritten signature in black ink, appearing to read "Philip C. Putnam", with a horizontal line extending to the right.

Philip C. Putnam
Mayor