



CITY OF BURBANK
COMMUNITY DEVELOPMENT DEPARTMENT

275 East Olive Avenue, P.O. Box 6459, Burbank, California 91510-6459

www.ci.burbank.ca.us

January 28, 2011

Jon Foreman
Senior City Planner
Los Angeles Department of City Planning
200 North Spring Street, Room 601
Los Angeles, California 90012

Via facsimile to (213) 978-6566 and email to Jon.Foreman@lacity.org

Re: Comments on NBC Universal Evolution Plan Draft Environmental Impact Report

Dear Mr. Foreman:

The City of Burbank has reviewed the Draft Environmental Impact Report (DEIR) for the proposed NBC Universal Evolution Plan. Due to the proximity of the project site to the City of Burbank, the City is very concerned about the project and the impacts it will have on Burbank streets, residents, and businesses. The City of Burbank respectfully submits the following comments.

Traffic and Transportation

1. Travel Demand Model / Growth Forecasts

City of Burbank Community Development Department staff collaborated with the project's traffic consulting staff to develop a modified travel demand model for the NBC Universal Evolution Plan. This modified model was developed in response to initial concerns the City had regarding the ability of the original travel demand model to forecast traffic conditions in Burbank.

The revised model used for the Alternative Impact Analysis for the City of Burbank (DEIR Exhibit E – Transportation Study Appendix F) includes a more detailed street network for Burbank as well as refined network link attributes for number of travel lanes, capacity, and speed parameters. The model also includes a more detailed traffic analysis zone structure and centroid connectors that satisfactorily simulates intersection volume assignments and existing traffic patterns in the city. In addition, at the City's request the project study area was expanded to include eight additional intersections in Burbank, bringing the total number of studied intersections in the city to 36. The modified travel demand model was used to distribute and assign project traffic to Burbank streets, and the output from this modified model was used to identify significant traffic impacts in the City of Burbank under the Alternative Impact Analysis.



By way of a letter transmitted to the project consulting team in December 2009 (attached hereto), City of Burbank staff acknowledged that the modified model methodology, study area, network and zone structure, background socio-economic data and forecasts, traffic counts, and other data had been developed in accordance with Burbank's policies for project traffic studies.

The City has identified errors in the cumulative projects list included in the DEIR (DEIR Exhibit E – Transportation Study, Table 10: Trip Generation Estimates for Cumulative Projects, page 96) including an under-reporting of entitled development at major studio campuses in the City including Warner Brothers, Disney, and NBC-Burbank in excess of 4,000,000 square feet. Through the collaborative modeling process conducted for the Burbank-specific Alternative Impact Analysis (DEIR Appendix E – Transportation Study Appendix F: LOS Worksheets and Impact Analysis Other Jurisdictions), it was the City's understanding that all cumulative projects reasonably foreseeable in the City of Burbank have been accounted for in the travel demand model land use assumptions. However, DEIR Appendix E, Transportation Study Appendices G, H, and I documenting the travel demand modeling process does not document the Burbank-specific Travel Demand Model developed for the Burbank-specific analysis. Therefore, the City cannot verify that the City's entitled cumulative projects are included in the background, cumulative project traffic for the model used in the DEIR supplemental Burbank analysis. If these cumulative projects are not accounted for, then the study grossly under-estimates the background traffic in the City of Burbank and does not represent an accurate portrayal of traffic impacts by the project in the City of Burbank. The City requests that the study document the cumulative projects accounted for in the project's background traffic to show that all approved and entitled projects in the City of Burbank have been accounted for.

While the City endorses the modified travel demand model as a tool for identifying impacts and developing mitigations for the NBC Universal Evolution Plan, it does not necessarily endorse model inputs, including but not limited to project trip generation and trip reductions. Comments regarding the trip generation assumptions used for the DEIR are included below.

2. Trip Generation / Transportation Demand Management Credits

The City believes that the trip generation derived for the retail and housing portion of the project is too low given the size and type of proposed uses, the relation of these uses to existing and planned transit networks, the demographics of the users of the proposed uses, and the guidelines presented in the Institute of Transportation Engineers (ITE) *Trip Generation Handbook*. In particular, a number of credits for pass-by, walking, and internal capture on the retail portion of the project are too aggressive given the project characteristics. First, the study uses the trip generation rate for "Shopping Center" when estimating trips for the neighborhood and community retail uses, which total approximately 145,000 square feet. The ITE Shopping Center describes retail centers that combine multiple tenants into a common facility that is managed as a single development. The study uses the ITE average rate for these uses, when the ITE *Trip Generation Handbook* recommends that the fitted curve be used instead (ITE Trip Generation Handbook, Second Edition, Section 3.4, page 9). Using the fitted curve instead of the average rate would yield nearly twice as many trips in the PM peak hour, and approximately 50 percent more daily trips for the retail uses. The City requests the study utilize shopping center fitted curve rates as recommended by ITE rather than the average rate.

In addition, a number of trip credits are taken from basic trip generation to account for factors like pass-by trips, internal capture trips, and non-motorized trips. The City believes that application of these credits on top of the already-low trip generation for the retail uses severely undercounts the trip generation. First, ITE provides an average pass-by trip generation credit of 34 percent for shopping centers, while the traffic study applies a 40 to 50 percent credit. This is compounded with an additional credit for walking/cycling/internal capture trips that is inappropriate for the proposed uses, especially since the use of the shopping center rate (instead of explicit ITE rates for retail, restaurant, and other uses commonly found in a shopping center) already implies internal capture of trips due to the nature of a shopping center use. Because these large credits are compounded on top of an already-low trip generation rate (from the average rate instead of the fitted-curve rate), the City believes the trip generation is underestimated. The City requests the study utilize a lower, more realistic pass-by rate for the retail portions of the project. Finally, it is possible that on top of these credits an additional Transportation Demand Management (TDM) credit was taken on the community and neighborhood retail portions of the project, although this is not clear from the study (DEIR Appendix E – Transportation Study Table 19 – Proposed Project TDM Program, page 287). The City does not believe that a TDM reduction is appropriate on the retail portions of the project due to the location of the retail in relation to transit.

The study does not document how expected increases in attendance to the existing theme park and entertainment uses of the project translate to increased trip generation under future conditions. This increased attendance should be factored into the existing project future trip generation and included in the analysis. Also, the study assumes a very low per-square-foot trip generation rate for the new entertainment uses proposed as part of the project. Using the trip generation for entertainment uses from the study (DEIR Appendix E – Transportation Study, Table 14, page 173), the existing entertainment uses generate more than 17 daily trips per 1,000 square feet, while the new entertainment uses are only expected to generate a little over 7 daily trips per 1,000 square feet (after accounting for the trip generation of the hotel use). A similar relationship exists for the AM and PM peak hour trip generation rates. This suggests that the new entertainment uses will generate significantly less trips than the existing uses. The City believes that the trip generation for the proposed entertainment uses is too low.

The City also disagrees with the trip generation reduction claimed for the TDM program that is proposed to reduce the project's trip generation. In particular, the study is applying a 20 percent TDM reduction on the 2,937 new housing units proposed for the project. This is an extremely aggressive TDM reduction for housing units in Los Angeles, especially if the housing is targeting upper-income households, requires bus-to-rail transfers, and includes multiple free parking spaces for each housing unit. Other than the provision for free transit passes and a marginal proximity to the Metro Red Line (requiring either a long walk or a bus transfer), there is virtually no incentive for the residents of the housing units in the proposed project to shift to bus or rail. The City suggests that if an aggressive TDM reduction be proposed that it be coupled with equally-aggressive TDM measures such as parking pricing or unbundled free parking, reduced parking ratios (e.g. provide one space per unit), or direct proximity to the Metro Red Line Subway, Metro Rapid bus, or other high-capacity bus services. As proposed, the layout of the residential units in relation to transit amenities and the lack of any true disincentives

to driving will not result in a 20 percent trip generation reduction on the housing portion of the project.

These comments also apply to the 16.5 percent TDM reduction on the office component, especially with regard to the large amounts of parking being provided to office workers. Like the residential, there is little incentive to utilize transit if abundant parking is being provided on site.

The study indicates that a Transportation Management Association (TMA) will be developed for the project, but does not explicitly describe how the TMA would be established, who would be responsible for its administration, or how the TMA would be funded. The City requests that a mitigation measure be added to specify the details of the required TMA, and to ensure that membership be required by all new and existing commercial and retail tenants of the proposed project. In addition, the City requests that the TMA be required to participate in the trip reduction monitoring required to validate the trip generation caused by each phase of the project.

3. Project Phasing and Mitigations

The project proposes a phased project implementation that conditions development of future phases based on completion of mitigation measures and monitoring of actual trip generation of prior phases. However, while the project identifies specific improvements to be constructed as part of specific project phases, there is no mechanism to ensure that actual trip generation of each phase is correlated to predicted trip generation identified in the study. The project's mitigation monitoring and phasing program requires that mitigations for future phases be advanced if the trip generation for a given phase exceeds the generation predicted in the study (DEIR Appendix E – Transportation Study Appendix S, Table S-1, Footnote [b], page S-2). However, given the aggressive trip reductions proposed by the study, the City believes that this phasing plan is inadequate. The City requests that an additional mitigation measure be imposed on the project to include hard trip caps on each phase, such that actual project trip generation is measured at each phase, and that future phases are contingent on achieving trip generation at or below the generation predicted by the study, in addition to constructing the mitigation measures identified at each phase. Development of future phases would be prohibited unless actual trip generation is proven to match the generation identified in the study, and the mitigations identified for each project phase have been completed. Information requiring the trip generation of each phase should be provided to the City of Burbank before the project moves from one phase to another. Further, as an additional mitigation monitoring tool, the City requests that traffic monitoring infrastructure be built into project driveways for existing and future project phases so that actual, real-time sampling of traffic volumes of the project can be captured (e.g. installation of loop detectors in project access points and driveways to monitor actual trip generation of the project). This monitoring equipment can be used to verify any trip generation assumptions included in the analysis and ensure compliance with phasing requirements.

The DEIR should explicitly state that all identified project mitigations are mandatory mitigations that must be funded by the project applicant when required to be implemented by the specific project phase as identified in the project phasing program.

4. City of Burbank Alternative Impact Analysis Methodology

The City of Burbank Alternative Impact Analysis (DEIR Appendix E – Transportation Study Appendix F: LOS Worksheets and Impact Analysis Other Jurisdictions) indicates that the City's Interim Traffic Study Guidelines (City of Burbank, November 2007) were used to conduct traffic impact analysis under the Alternative Impact Analysis. However, the Significant Impact Criteria described on page F-4 of the Transportation Study Appendix F does not match the criteria outlined in the City's Interim Traffic Study Guidelines. In general, the City's thresholds mirror those of the City of Los Angeles, except that the threshold for intersections at LOS F is more stringent than the City of Los Angeles. The City requests that the study affirm which impact analysis was used for the Alternative Impact Analysis to show that it is consistent with the City of Burbank Interim Traffic Study Guidelines, or at a minimum conform to the City of Los Angeles significance thresholds for LOS D, E, and F intersections (which are substantially similar to the City of Burbank). Also, the study should explain how differences in the impact analysis from the main body of the traffic study and the Impact Analysis of Other Jurisdictions in the Transportation Study Appendix F were used to derive project impacts and mitigations identified in the DEIR, including whether or not the expanded list of 36 study intersections in Appendix F resulted in additional project impacts.

5. Traffic Signal Improvements

The project has proposed to mitigate certain intersection traffic impacts through improvements to traffic signal infrastructure in the City of Burbank. The project proposes to connect a number of existing traffic signals to Burbank's Citywide Signal Control System (CSCS) through hardware upgrades to improve overall vehicle capacity by three percent over existing conditions. The City generally approves of this approach to increase capacity (versus implementing roadway widening) but the project mitigations do not specify the actual signal improvements that would be implemented to achieve this capacity credit.

The City has identified the improvements necessary to achieve an increase in capacity at the project study intersections identified, and has itemized these improvements and estimated their cost. In general, the City has identified physical hardware upgrades (controllers, poles, conduit, etc.) as well as necessary software and timing improvements (master control software, development of timing plans, data collection) to achieve this capacity increase. These improvements and present-day cost estimates are as follows:

- **Pass at Verdugo (Intersection #75, B-27):** Fully modify the traffic signal at this intersection for approximately \$200K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network requiring 1500 feet of conduit and fiber optic cable at a cost of \$75K and the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of \$6K.
 - Cost: \$281K
- **Evergreen at Riverside (Intersection #77, B-28):** This intersection requires minor traffic signal modification for approximately \$50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network requiring

including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of \$6K.

- Cost: \$56K
- **Pass at 134 E/B off-ramp (Intersection #78, B-29):** This intersection requires minor traffic signal modification for approximately \$50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network requiring 1200 feet of conduit and fiber optic cable at a cost of \$25K and the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of \$6K.
 - Cost: \$81K
- **Pass at Alameda (Intersection #79, B-30):** This intersection requires minor traffic signal modification for approximately \$50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of \$6K.
 - Cost: \$56K
- **Pass at Riverside (Intersection #80, B-31):** This intersection requires minor traffic signal modification for approximately \$50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of \$6K.
 - Cost: \$56K
- **Pass at Olive (Intersection #81, B-32):** Modify the traffic signal at this intersection for approximately \$100K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of \$6K.
 - Cost \$106K
- **Olive and Warner Brothers Studio Gate 2/Gate3 (Intersection #83, B-33):** This intersection requires minor traffic signal modification for approximately \$50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of \$6K.
 - Cost: \$56K
- **Olive and Warner Brothers Studio Gate 1/Lakeside (Intersection #83, B-34):** Fully modify the traffic signal at this intersection for approximately \$250K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of \$6K.
 - Cost: \$256K

- **Alameda at Hollywood Way (Intersection #84, B-35):** Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of \$6K.
 - Cost: \$6K

- **Olive at Hollywood Way (Intersection #86, B-36):** Fully modify the traffic signal at this intersection for approximately \$250K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of \$6K.
 - Cost: \$256K

- **Olive at Riverside (Intersection #87, B-37):** This intersection requires minor traffic signal modification for approximately \$50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network requiring the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of \$6K.
 - Cost: \$56K

The City has identified additional signal improvements at one smaller signalized intersection and two roadway corridors within the project study area. These locations were not identified as being impacted in the study, but are located between and adjacent to impacted intersections. The City believes that improvements at these locations are needed to achieve the three percent capacity credit at the adjacent, impacted intersections. These improvements are identified below.

- **Pass at Oak (this intersection was not identified in DEIR as impacted):** This intersection is located within a corridor of five impacted study intersections. The City believes that coordination at this intersection is required to achieve a capacity credit at the adjacent impacted intersections of Pass at Verdugo, Pass at EB 134, Pass at Alameda, Pass at Riverside, and Pass at Olive. The existing traffic signal at this intersection should be fully modified for approximate cost of \$200K.
 - Cost: \$200K

- **Pass Avenue between 134 and Verdugo (not identified in the DEIR):** This intersection is located within a corridor of five impacted study intersections. Staff believes that interconnection on this portion of the corridor is required to achieve a capacity credit at the adjacent impacted intersections of Pass at Verdugo, Pass at EB 134, Pass at Alameda, Pass at Riverside, and Pass at Olive. This corridor segment should be interconnected to provide and enhance coordination.
 - Cost: \$500K

- **Verdugo between Hollywood way and Buena Vista (not identified in the DEIR):** Staff believes since this segment connects to an impacted corridor, it should be interconnected to provide and enhance coordination.
 - Cost: \$250K

The City has also identified a need to provide better inter-jurisdictional traffic signal coordination along the Barham/Olive corridor between the City of Burbank and the City of Los Angeles. This corridor includes a number of impacted intersections. Enhanced inter-jurisdictional coordination is required to realize the capacity credits applied to intersections in this heavily-travelled corridor.

- **Burbank TMC and LADOT through Olive and Barham: (not identified in the DEIR):** Staff believes that since this segment is along an impacted corridor, it should be interconnected between the two cities with ITS equipment (conduit fiber, Dynamic Message Signs, control hub station, network equipment & misc) to provide and enhance coordination.
 - Cost: \$500K

Finally, the City believes that the following system hardware, software, and timing resources are needed to fully interconnect the intersections identified in the study as being impacted by the project. The following additional improvements are identified to achieve the three percent capacity credit identified at many of the impacted study intersections in Burbank.

- **Timing Plan Study:** Lump sum of approximately \$150K
 - Cost \$150K
- **Adaptive Traffic Control System**
 - Software Upgrade for \$200K
 - Hardware (Vehicle detection system placement) for \$500K
 - Hardware (Controller Upgrade) for \$100K
 - Cost \$800K

The total cost for the above traffic signal improvements (in 2010 dollars) is approximately **\$3.6 million**. It should be noted that these cost estimates are based on current design and construction cost experience. The actual costs borne by the proposed project would be adjusted based on market conditions that exist when the project scope is finalized and the improvements are constructed.

6. Physical Improvements

The study has identified a number of physical improvements to mitigate project impacts in Burbank. These improvements include roadway intersection restriping, widening, parking removal, and sidewalk narrowing to add roadway capacity in the project area. These improvements have been proposed in response to both the primary, project-wide traffic analysis as well as the secondary, Burbank-specific supplemental analysis that was requested by the City. In some cases these physical improvements are accepted in concept, but the implementation of

the improvements is not within acceptable engineering standards (e.g. narrow lanes, reduced-width sidewalks). In other cases, the improvements would reduce on-street parking or restrict turning movements. In some cases these improvements cannot be supported by the City given the Burbank City Council's policy direction with regard to street widening and parking removal. Detailed comments on each proposed physical improvement are described below.

- **Evergreen at Riverside (Intersection #77, B-28):** The study identifies that that the applicant or its successor should widen the south side of Riverside immediately west of the intersection to provide dual Right Turn Lanes. The City requests that this improvement be implemented in consultation with City staff to ensure that the improvement is built to acceptable City standards.
- **Pass at Alameda (Intersection #79, B-30):** The study identifies that the applicant or its successor should widen the north side of Alameda immediately east of intersection to allow an exclusive west bound 10-foot right turn lane, even though the minimum acceptable curb-lane width is 12 feet. The City does not approve of this mitigation and requests instead that a 12-foot right-turn-lane (not 10-foot) be striped in the existing roadway curb-to-curb width, along with the required lane shifts to accommodate this additional lane, rather than by widening the roadway and narrowing the sidewalk.

In addition to the above, the study recommends prohibiting northbound left turns at this intersection. The purpose is to extend the dual southbound Left Turn Lanes on Pass approaching Riverside. The City does not support this recommendation. If the prohibition is put in place it will make it very difficult for drivers on northbound Pass to get to destinations to the west and provides no reasonable alternatives for drivers to access westbound Alameda beyond the turn restriction. It is also not clear if secondary impacts from this turn prohibition on other intersections to the north of the intersection were analyzed. The City requests the project consulting staff work with City staff to identify an alternative physical improvement at these locations and, if no acceptable improvement is identified, to consider reductions in the project size to mitigate this impact, or to identify this intersection as an unmitigated project impact.

- **Pass at Riverside (Intersection #80, B-31):** The study identifies that that the applicant or its successor should widen and remove on-street parking along the south side of Riverside, immediately west of intersection to allow an exclusive east bound 11-foot right turn lane, even though the minimum acceptable curb-lane width is 12 feet. Widening streets and removing on-street parking in order to increase intersection capacity at this location would likely not be supported by the City Council given prior policy direction with regard to parking removal and roadway widening. The City requests the project consulting staff work with City staff to identify an alternative physical improvement and, if no acceptable improvement is identified, to consider reductions in the project size to mitigate this impact, or to identify this intersection as an unmitigated project impact.

- **Pass at Olive (Intersection #81, B-32):** The study identifies that the applicant or its successor widen Olive Avenue to provide dual left turn lanes northbound, three through lanes in each direction, and modify the traffic signal to accommodate this change. This improvement is on the City's long-range transportation plans and is identified as a mitigation measure for another development project in the City of Burbank. However, the study proposes a total of eight 10-foot lanes, including curb lanes, in this stretch of Olive Avenue with a horizontal curve with high rate of speed and reduced sidewalk width. This concept is not acceptable as it introduces hazardous roadway geometry. A similar improvement to the one that is recommended as a project mitigation is identified on the City's long-range plans as a mitigation for a previously-entitled development project, but the City's improvement assumes that additional right-of-way is required from adjacent properties to provide acceptable, safe lane and sidewalk widths. The City requests that the project consultant staff work with City staff to identify an improvement design that would accommodate acceptable lane and sidewalk widths and identify the required right-of-way needed for the improvement.
- **Olive and Warner Brothers Studio Gate 2/Gate3 (Intersection #83, B-33).** The study does not address the existing on-going conflicts due to the steady flow of vehicles on Olive Avenue blocking the crosswalk on the south side. The City requests the project consulting staff work with City staff to identify an improvement to this conflict and, if no acceptable improvement is identified, to consider reductions in the project size to mitigate this impact, or to identify this intersection as an unmitigated project impact.
- **Olive and Warner Brothers Studio Gate 1/Lakeside (Intersection #83, B-34):** The study identifies a need to restripe the eastbound direction to provide an exclusive eastbound Right Turn Lane and shared through and Left Turn Lane in that direction. This improvement can be constructed in existing street-widths with minimal effects to on-street parking.
- **Alameda at 134 W/B on-ramp (Intersection #164, B-38):** The study identifies a need to install a traffic signal at the 134 W/B on-ramp west of Hollywood Way and interconnect it with the existing traffic signal at intersection of Alameda and Hollywood Way. However, the level of service analysis for this intersection and the proposed improvement do not consider changes in roadway configuration due to the new westbound 134 on-ramp at Hollywood Way that is under construction and expected to open in April 2011. The City requests that the study be revised to account for the pending ramp improvement and intersection geometry at this location. The City can provide the planned intersection configuration to the project applicant.
- **Alameda at Hollywood Way (Intersection #84):** Level of service analysis for this intersection does not consider changes in roadway configuration due to the new westbound 134 on-ramp at Hollywood Way that is under construction and expected to open in April 2011. The City requests that the study be revised to account for the pending ramp improvement and intersection geometry at this location. The City can provide the planned intersection configuration to the project applicant.

7. Neighborhood Intrusion Impacts

The study identifies certain neighborhoods in the Burbank Media District as potentially being significantly impacted by project “cut-through” traffic. This includes neighborhoods west of Olive Avenue (impacted under Future, 2030 with Project with TDM conditions, before Mitigations), and neighborhoods adjacent to the Olive Avenue / Hollywood Way intersection (impacted under Future, 2030 with Project, before TDM conditions).

In addition, the study identifies significant project traffic travelling through the Pass Avenue corridor between Olive Avenue and Verdugo Avenue, which implies that significant project traffic is being directed into residential neighborhoods north of Verdugo Avenue. Therefore, the project may significantly impact local residential neighborhoods north of Verdugo Avenue between Hollywood Way and Clybourn Avenue. Given the unpredictability of forecasting neighborhood traffic impacts prior to implementation of the project (per DEIR Appendix E – Transportation Study, page 368) and the City’s skepticism that the aggressive TDM reductions will be realized, the City requests that the project provide a mechanism to fund a neighborhood protection program in the following neighborhoods:

- a. The area bounded by Olive Avenue, Lakeside Drive the western city limits, and Riverside Drive
- b. The area bounded by Olive Avenue, Pass Avenue, Riverside Drive, and Hollywood Way
- c. The area bounded by Verdugo Avenue, Clybourn Avenue, Clark Avenue, and Hollywood Way

8. Consideration of Previously-Entitled Development Projects and Mitigations

The Burbank Alternative Impact Analysis includes project traffic impact analysis under two future roadway scenarios. In the first scenario, only future, funded roadway improvements are considered to be in place by the project horizon year. In the second scenario, the City’s long-range transportation improvements are also assumed to be constructed by 2030. These improvements include intersection and signal projects that are identified in the City’s long-range infrastructure blueprint as well as improvements identified as mitigations for entitled developments for the three major studio campuses in the Media District. While these two alternative analyses are included to show traffic impacts under both scenarios, the DEIR does not describe how differences in the impacts under both of these scenarios affect the sequencing or coordination of project mitigations with previously-planned long-range improvements. It does not explain if there are different project impacts identified under each of the two roadway scenarios. It also does not clearly describe how the project may need to mitigate intersection impacts if improvements are required that are shared by both the proposed project and previously-entitled projects in Burbank. For impact mitigations that might be shared with other development projects, the DEIR should provide an alternative to provide a fair-share cost of the improvements or to coordinate with other development projects that share the improvement.

9. Transit Improvements

The proposed project includes funding of a shuttle system to integrate the project with the surrounding transit network. This system is used to justify the aggressive TDM reductions to the project's trip generation. This system is proposed to connect the outlying portions of the project (such as the residential and retail component near Barham Boulevard and Forest Lawn Drive) to the denser core of the existing and proposed office and studio uses. This system is also proposed to connect the project to the Metro Red Line subway, the Hollywood district of Los Angeles, and the Media District and Downtown areas of Burbank.

The City believes that this shuttle system needs to be a traditional, fixed-route service both within the project site as well as along the corridors that serve Burbank and Hollywood. An on-call, demand-responsive system would not be effective in shifting the project's employees, visitors, and others to transit because the on-call system requires too much advance planning and transfer times to make this system effective. The City believes that the shuttle service should provide 15-minute peak period and 30-minute off-peak service on a fixed route with local stops within and outside the project site, and with a published, fixed schedule. Further, this system should be branded as a service included in one of the existing transit systems (such as Metro, LADOT, or BurbankBus) rather than a standalone, Universal-branded shuttle with little recognition to infrequent or new transit riders. Branding the service as part of the larger region will help increase its awareness as another transit resource amongst existing bus, rail, and commuter rail systems.

The City believes that the system should add additional connectivity to the regional bus transit network to help shift the project's trips to transit. The shuttle service should provide a through-connection between outlying endpoints rather than providing separate shuttle routes that converge at the proposed transit hub near Barham Boulevard and Lakeside Drive. For example, the service should instead run from either Downtown Burbank to Hollywood (through the project site) or from Downtown Burbank to the Universal Metro Red Line Station (through the project site) so that new regional transit connections are established in addition to service to the project. In particular, the Burbank-to-Hollywood route could provide a transit alternative to the congested Barham corridor while still connecting the residential portion of the project to two major trip destinations.

The City believes that justification of an aggressive TDM credit needs to include provisions for connecting the project site to the Bob Hope Airport, the Metrolink/Amtrak Ventura Line, and the large media employment center in the Golden State area of Burbank east of the airport. The transit mitigation package should include enhanced transit connectivity to the Bob Hope Airport area through expanded service on the existing Metro Local 222 route along Hollywood Way similar in scope to the transit connections proposed in the study. In addition, the transit mitigations should include a requirement for the project to participate in any future transit studies of the Bob Hope Airport area and should include provisions for connecting to the proposed California High Speed Rail station at its San Fernando Valley station.

Finally, the City believes that proposed roadway improvements should complement the proposed transit improvements to improve transit travel times relative to auto travel and encourage shifts

to transit. Consideration should be given to implementing the proposed third through lane on Barham Boulevard as a transit-only lane (similar to the Wilshire Boulevard bus lanes) rather than a mixed-flow lane. Given the tremendous latent demand for vehicle travel in the Barham corridor, a new mixed-flow lane will do nothing to improve travel times for vehicles, but reserving it for transit vehicles could provide an improvement to bus travel times and make transit trips in the corridor more attractive. Consideration should also be taken to implement this odd-numbered fifth through lane as a reversible lane to accommodate directional AM and PM travel flows. In addition, implementation of the proposed interior “north-south spine road” should provide for transit infrastructure such as pre-emption, queue jumps, and other measures to improve transit flow in the project site.

10. Los Angeles River Bicycle Path

The City requests that the project participate in completion of the Los Angeles River bicycle path between Barham Boulevard and Lankershim Boulevard along the Los Angeles River. Identified in the Los Angeles River Master Plan, this is a critical link in a regionally significant Class I bicycle path and will integrate the proposed project in the region’s bicycle facilities. The City of Burbank is pursuing infrastructure to connect its Media District to the proposed LA River path, and integration of the path with the proposed project will help to provide infrastructure that supports the study’s claimed TDM and non-motorized transportation credits.

Public Services

The Public Services sections of the DEIR analyze impacts on services and facilities in the City and County of Los Angeles but do not analyze impacts on services or facilities in the City of Burbank. This is of particular concern for Libraries, Parks and Recreation, and Police services. The EIR must discuss impacts to public services in general, regardless of the jurisdiction in which the services are located, rather than focusing only on those located in the City and County of Los Angeles.

There are library and park facilities located in the City of Burbank near the project site. In some cases these facilities may be more convenient and/or desirable for project tenants than comparable facilities in the City or County of Los Angeles. To use a specific example, the City of Burbank’s Buena Vista Branch Library, located at 300 North Buena Vista Street, is the closest library to the project site of any jurisdiction, and probably the most convenient to access. Further, the Buena Vista Branch Library is larger than the two closest City of Los Angeles libraries that are cited in the DEIR (North Hollywood and Goldwyn), with 28,000 square feet and over 184,000 volumes. Since Burbank’s facility is closer, more convenient, and offers greater selection than the Los Angeles City or County libraries discussed in the DEIR, it is possible that there may be greater impacts on Burbank’s Buena Vista Branch Library than other libraries discussed in the DEIR. While the proposed mitigation measure to locate a branch library on the project site may mitigate some of this impact, the limited size and number of volumes that will be found at that library will mean that many residents will still need to travel off-site for more complete library services.

The City of Burbank is a member of the Southern California Library Cooperative (SCLC) along with the City and County of Los Angeles.¹ Burbank also operates a universal borrowing program with the Los Angeles City and County libraries, so residents of those areas may receive free Burbank library cards and enjoy the same privileges as Burbank residents. The Burbank Public Library currently has about 73,000 library card holders, of which about 26,000 are residents of the City of Los Angeles. About 9,400 of those residents live in ZIP codes that are adjacent to the project site. The DEIR states that the residential component of the project is expected to add 6,450 residents to the area. As such, there is the potential for a notable increase in Burbank library card holders and service demands placed on the Buena Vista Branch Library and other Burbank libraries. This should be discussed and analyzed in the EIR.

Similarly, the DEIR focuses its discussion of police impacts on the Los Angeles Police Department and Los Angeles County Sheriff's Department, and primarily focuses on on-site crime and policing issues. However, the proposed project would result in substantial numbers of additional people coming into Burbank for shopping and recreation and vehicles using Burbank streets. The additional traffic and people will lead to increased demand for police services in Burbank as a result of increased traffic infractions, accidents, and criminal activity. This will impact the Burbank Police Department and may affect its ability to continue providing the same levels of service to the Burbank community. The EIR should discuss the potential impacts on the services of all affected police departments and not just the Los Angeles Police Department and Los Angeles County Sheriff's Department. It may be necessary to identify mitigation measures to reduce potentially significant impacts on the Burbank Police Department.

Thank you in advance for your attention to the concerns raised in this letter. Should you have any questions or concerns, please contact me at (818) 238-5250 or mforbes@ci.burbank.ca.us.

Sincerely,
Community Development Department



Michael D. Forbes
Assistant Community Development Director / City Planner

Attachment

cc: Honorable Mayor and Members of the Burbank City Council
Michael Flad, City Manager
Dennis Barlow, City Attorney
Greg Herrmann, Community Development Director

¹ On page 1813, the DEIR references the Metropolitan Cooperative Library System. The SCLC has replaced that organization.



CITY OF BURBANK
COMMUNITY DEVELOPMENT DEPARTMENT

275 East Olive Avenue, P.O. Box 6459, Burbank, California 91510-6459
www.ci.burbank.ca.us

December 21, 2009

Mr. Pat Gibson, P.E.
Gibson Transportation Consulting, Inc.
660 S. Figueroa Street, Suite 1120
Los Angeles, CA 90017

RE: Endorsement of the Modified Travel Demand Model for the Universal Evolution Plan

Dear Pat:

This letter is in response to your request for a written acknowledgement of our collaborative efforts to develop a revised travel demand model for the purposes of determining traffic impacts in the City of Burbank related to the Universal Evolution Plan (formally the NBC Universal Vision Plan).

As you know, City of Burbank Community Development Department Transportation Section staff have been working with your transportation engineering and travel demand modeling staff to develop a modified model for the Universal Evolution Plan. This modified model was developed in response to initial concerns we had regarding the ability of your original travel demand model to forecast traffic conditions in Burbank.

This revised model includes a more detailed street network for Burbank as well as refined network link attributes for number of travel lanes, capacity, and speed parameters. The model also includes a more detailed traffic analysis zone structure and centroid connectors that satisfactorily simulates intersection volume assignments and existing traffic patterns in the city. In addition, at our request you expanded the traffic study area to include eight additional intersections in Burbank, bringing the total number of studied intersections in the city to 36. As we understand, this modified travel demand model will be used to distribute and assign project traffic to Burbank streets, and that the output from this modified model will be used to identify significant traffic impacts in the project's Draft Environmental Impact Report (DEIR).

By way of this letter, City of Burbank staff acknowledge that the modified model methodology, study area, network and zone structure, background socio-economic data and forecasts, traffic counts, and other data has been developed in accordance with our city policies for project traffic studies.

While we endorse the modified travel demand model as a tool for identifying impacts and developing mitigations for the Universal Evolution Plan, this letter does not endorse the project itself or any findings that will be derived from the use of this modified model as will be reported in the project's DEIR. Accurate results of the model depend upon the accuracy and



appropriateness of model inputs. This letter does not endorse model inputs including but not limited to project trip generation and trip reductions. Further, this letter does not endorse future project traffic forecasts resulting from project trip generation, project traffic impacts, or any proposed traffic impact mitigations identified in the DEIR.

The City of Burbank is currently undergoing a public process to update its General Plan Land Use and Mobility Elements, with a public hearing with the City Council scheduled for summer 2010. Input from this public process, results of environmental review, or direction from the City Council could change the inputs we have given to you to represent future conditions in the model. Thus, while the assumptions given to you to represent our best estimate of forecasted conditions in Burbank, these assumptions could change when the General Plan is updated.

Finally, while this letter acknowledges the validity of the travel demand model and model methodology, no comments contained herein should imply concurrence with any evaluation of traffic impacts associated with the proposed project. The City reserves the right to comment on the proposed project and project assumptions through the DEIR public comment period.

Thank you for providing the opportunity for us to provide input on the development of the travel demand model used to evaluate the Universal Evolution Plan. Should you have any further questions, please feel free to contact me at 818.238.5270 or via email at dkriske@ci.burbank.ca.us.

Sincerely,

A handwritten signature in black ink, appearing to read "David Kriske". The signature is fluid and cursive, written in a professional style.

David Kriske
Principal Planner, City of Burbank Community Development Department