April 10, 2007

Ms. Carrie Pourvahidi  
Deputy Director  
California High-Speed Rail Authority  
925 L Street, Suite 1425  
Sacramento, CA  95814

ATTN: Palmdale-Los Angeles

Dear Ms. Pourvahidi:

Thank you for allowing us to comment on the Notice of Preparation (NOP) for a Project Level EIR/EIS for the Palmdale to Los Angeles segment of the California High Speed Train System. As the City of Burbank is located along the segment and would have a station located within the City, we are very eager to work with the Authority as it further refines the project through the Project Level EIR/EIS phase. As we commented previously as part of the Program Level EIR/EIS in 2004, the City does have some specific concerns relating to the proposed project that we would like to see addressed as part of the Project EIR/EIS. Below are some of the issues that the City feels needs further discussion and analysis:

**Project Alignment and Cross-Section**

The Program EIR/EIS did not adequately detail the proposed alignment to be considered in the City of Burbank and did not clarify if an elevated, at-grade, or depressed cross section was being considered. The Project EIR/EIS should clarify the proposed cross section and provide a detailed analysis of the environmental effects of the proposed alignment, especially for any elevated segments. The City is concerned that plans outlined under the Program EIR/EIS do not consider a proposed rail grade separation at Buena Vista Street, nor do they show how the alignment will cross over or under existing grade separations at Burbank Boulevard, Magnolia Boulevard, and Olive Avenue. Finally, the City currently does not support the Combined UPRR/Metrolink & I-5 Alignment along Interstate 5 south of the Downtown Burbank Metrolink Station due to the significant residential noise and aesthetic impacts to low-income neighborhoods south of Olive Avenue.

**Consistency with Planned Transportation Improvements**

The City requests that the Project EIR/EIS consider planned transportation improvements in the Interstate 5 corridor between Hollywood Way and Olive Avenue. These improvements include a planned rail grade separation at Buena Vista Street (see above), a new grade-separated crossing at Empire Avenue, and extensive widening to Interstate 5 in this area that is planned to encroach in some of the existing rail right of way. As part of these improvements, the existing
UP/SCRRRA rail line will be relocated within the right of way to accommodate the freeway improvements. The project EIR/EIS should include these projects when evaluating alignment cross-section alternatives in this area. In addition, both the City and the Metropolitan Transportation Authority (MTA) have adopted bicycle plans that identify a Class I bike path to be located in the rail right of way adjacent to San Fernando Blvd. and Victory Place. The City has applied for funding to construct a path in the City Limits, and the City of Los Angeles has already constructed a bicycle path in railroad right of way in the Sylmar area and has plans to extend this facility to the south. The City of Burbank requests that the Project EIR/EIS address the possibility of a bicycle path in the corridor and identify how the high speed train proposal might affect this facility.

Traffic and Circulation

The Program EIR/EIS and NOP describe a proposed station to be located at the Downtown Burbank Metrolink Station. We request that the Project EIR/EIS include a detailed traffic analysis of the effects the proposed station would have on adjoining street intersections, and include an analysis of the projected share of trips arriving to the station via alternative transportation modes. We request that the Authority consult with City staff to ensure that local impact thresholds and criteria are used to evaluate traffic impacts, and that mitigations for any impacts be developed as part of the high-speed train project. These thresholds can be provided to the Authority upon request. In addition, the EIR/EIS should include a study of projected parking needs as a result of the high speed train. Finally, any station circulation study should include an analysis of pedestrian and bicycle connections to ensure that the proposed station is well connected to adjoining land use and transit facilities to maximize integration of the station with the surrounding commercial, office, and residential land uses in the Downtown. Particular attention should be given to creating or improving pedestrian linkages between the proposed station on the west side of Interstate 5 and the Downtown land uses east of Interstate 5.

Land Use

The City of Burbank Center Plan amendment to the General Plan has identified the area near the Downtown Burbank Metrolink Station as an area for intensified, transit-oriented development, and is actively planning for future redevelopment of land adjacent to the station for a possible transit oriented development project. The City requests that the Project EIR/EIS identify and address any potential impacts to the ability to redevelop land in and around the proposed station, and address any possible inconsistencies with the Burbank Center Plan and the City’s General Plan.

Noise and Vibration

The Program EIR/EIS identified areas in the City of Burbank that could experience “high” or “medium” noise and vibration impacts. We request that the Project EIR/EIS include a more detailed analysis of the location of these impacts and their relation to sensitive land uses such as residential neighborhoods, schools, parks, and sensitive commercial businesses (such as sound recording studios, etc.). Any areas of “high” or “medium” impact should include mitigation
measures to reduce exposure to these sensitive land uses. Consideration should be given to areas adjoining any elevated rail sections proposed under the Project EIR/EIS.

Socioeconomic and Environmental Justice Issues

The Program EIR/EIS identified the possibility for impacts to low-income neighborhoods south of Olive Avenue, especially under the Combined UPRR/Metrolink & I-5 alignment. The City requests that the Project EIR/EIS further identify these potential impacts and identify mitigations as needed.

Relationship to Bob Hope Airport

The Draft Program EIR/EIS contemplated a station near Bob Hope Airport for the purpose of connecting the high-speed train system to this regional airport. However, the final Program EIR/EIS dropped this station from final analysis. As one of the goals of the high-speed train system is to connect regional airports, the City of Burbank requests that the Project EIR/EIS address how the high speed train system will be connected to Bob Hope Airport to ensure a better connection between regional air traffic from areas outside the state and destinations along the proposed high-speed train system.

Thank you again for providing the City of Burbank the opportunity to comment on the Notice of Preparation for the California High Speed Train Project. We look forward to working with the Authority on this project. If you have any further questions or require information on the City’s impact thresholds for use in the analysis, please feel free to contact me at 818.238.5269 or via email at dkriske@ci.burbank.ca.us.

Sincerely,

David Kriske
Senior Planner, Transportation
City of Burbank Community Development Department