

C I T Y O F B U R B A N K

O F F I C E O F T H E C I T Y C O U N C I L

April 20, 2022

Metropolitan Transportation Authority
Attn: North Hollywood to Pasadena Bus Rapid Transit Corridor Project FEIR Comment
One Gateway Plaza
Los Angeles, CA 90012

RE: City of Burbank Comments on North Hollywood to Pasadena Bus Rapid Transit Corridor Project and Final Environmental Impact Report

Dear Members of the Board of Directors:

The City of Burbank wants to thank you for the opportunity to provide comments prior to your consideration to approve the North Hollywood to Pasadena Bus Rapid Transit Corridor Project and to certify the Final Environmental Impact Report. The City of Burbank remains committed to ensuring that the proposed project expands the Los Angeles County regional transit network, connects Burbank jobs to reliable and convenient transit, and supports Burbank's goal of connecting 12,000 new housing units to transportation alternatives. We want to ensure that our City's residents and businesses are protected from potential impacts caused by the project, and we also want to ensure the project's success in further connecting to the regional transportation network. With these important goals in mind, the City of Burbank submits the following comments in response to the Final Environmental Impact Report and the changes proposed by Metro staff.

Dedicated Bus Lanes on Olive Avenue

The Burbank Community and the City Council have continued to voice concerns over the potential impacts of bus lanes on Olive Avenue. Metro's change from "curb-running" (bus lanes created from parking lane) to "side-running" (bus lanes created from a travel lane) has eliminated the primary concerns of parking and economic impacts to adjacent strip-commercial land uses on Olive Avenue, the risk for parking spillover into single family neighborhoods, and impacts to sidewalk widths and pedestrian access along and across Olive Avenue caused by street widening. We appreciate that Metro listened to the comments we submitted as part of the Draft EIR and removed the curb-running option from consideration.

The side-running option would affect transportation and land use along Olive Avenue differently than the curb-running option. Removing a travel lane on Olive Avenue would increase congestion and delay for motor vehicles traveling along the street, given the amount of traffic that currently uses Olive Avenue. Metro included a traffic diversion analysis in the FEIR that indicates that converting a travel lane to a bus lane would cause vehicle traffic to shift onto other streets (to bypass the resulting vehicle delays), and that the traffic that continues to use Olive Avenue would actually see improved travel times because the signal improvements made for the BRT would also improve travel for cars. Unfortunately this analysis and its assumptions were not documented in the FEIR. While the City agrees that traffic will shift to other streets, we disagree with Metro's assessment of the amount of traffic that will shift. Based on verbal discussions with Metro's staff regarding the assumptions made in this analysis, the City believes that it fails to account for the delays caused by that shifted traffic to other arterial intersections in the City

because it fails to properly analyze the available capacity at those streets' intersections. In urban street networks like Burbank, the roadway capacity constraints are at intersections, not along the street segments, which were measured by Metro. We believe converting a travel lane on Olive Avenue to a bus lane would result in some lesser amount of traffic shifts to other streets (due to less available intersection capacity elsewhere) and would result in higher levels of intersection congestion and delay on Olive Avenue during peak periods that would be noticeable to the driving public and would increase the risk of peak-period cut-through traffic into adjoining neighborhoods. A more detailed analysis of these shifts, along with an operational analysis of the project's impacts to Olive Avenue should be conducted to properly disclose how the project will affect Olive Avenue. A more detailed analysis will likely show that vehicle congestion on Olive Avenue will increase, along with a resulting increase in cut-through and spillover traffic into adjacent residential neighborhoods.

City of Burbank Requests Additional Funding for Neighborhood Protection

The City Council believes that implementation of side-running bus-only lanes require investments in additional neighborhood protection measures to ensure Olive Avenue vehicle traffic does not divert into adjoining neighborhoods. The City Council requests that Metro fund additional neighborhood protection and/or first-last mile improvements in the amount of \$5 million directed to neighborhoods adjacent to Olive Avenue between Alameda Avenue and Victory Boulevard, and that these improvements may be defined by the City of Burbank. These neighborhood protection elements would be funded as part of the project, and would be in addition to any other first-last mile improvements earmarked for project stations. This funding is necessary for the City to be able to protect neighborhoods while it simultaneously supports necessary regional transit connections that support its other goals and policies.

Olive Avenue between Buena Vista and Lake Should be Configured as Mixed-Flow Unless Ridership Goals Met Within 36 Months

Because implementation of a side-running bus lane and removing a travel lane could be detrimental to Burbank neighborhoods, Metro and the City will not see the true effects of this roadway reconfiguration until after the project is constructed. In addition, once the project is constructed, its operation may reveal that project ridership may not be high enough to justify the impacts on these neighborhoods caused by the conversion of travel lanes to bus lanes. Therefore, the City Council will not permit the construction of side-running bus lanes on Olive Avenue until the project achieves at least 17,500 average daily weekday boardings within 36 months of opening day. Should the project achieve that ridership level, then the City and Metro shall confer and consider whether Metro should install side-running bus lanes on Olive Avenue at its sole cost. This allows Metro and the City of Burbank to evaluate whether the project's ridership sufficiently justifies the conversion of vehicle lanes to bus lanes and the potential impact that conversion has on adjacent residential neighborhoods.

City Believes Olive Bridge Station Should be a Required Separate Project

Metro's removal of the Olive Avenue Bridge station and its relocation to Lake Street will significantly compromise the project's ability to meet the goals and objectives of providing a convenient, reliable, regional transit service for the region's transit riders. Connecting the proposed BRT project to Metrolink is critical to creating a travel alternative to the automobile and to support the region's investments in Metrolink service. The new proposed station at Olive and Lake would require connecting Metrolink riders to walk 1/3 mile along an uninviting and narrow pedestrian path alongside and under the Olive overpass, which would unduly burden patrons with

disabilities. This lack of connection is contrary to Burbank2035 Mobility Element Policy 4.8, which is to “Promote multimodal transit centers and stops to encourage seamless connections between local and regional transit systems, pedestrian and bicycle networks, and commercial and employment centers.” Further, moving the station to Lake Street does not address the FEIR’s failure to address the project’s connection to the following existing and planned Class I and IV bicycle facilities, which is also contrary to Policy 4.8: Chandler Bikeway, Burbank Channel Bikeway, San Fernando Bikeway, First Street Bikeway, and Front Street Cycle Track. Connecting the BRT to Metrolink and the adjacent bicycle facilities must be a high priority for the project.

The City Council requests that the Metro Board of Directors direct its staff to work with the City to develop a program to upgrade the Olive Avenue Bridge to include a BRT station, including the required vertical connections to the Metrolink Station below and the necessary pedestrian improvements made to the bridge. This will likely require a substantial modification or reconstruction of the Bridge, and would likely take longer to implement than the BRT project’s 2024 timeline for opening. The City Council believes Metro do more than simply offer to move the station should the City reconfigure the bridge, but instead should actively seek outside state and federal funding for the necessary improvements, and include this project as one of its formal funding priorities. The City has already committed a portion of its Measure R Arroyo Verdugo Highway Operations Improvement Funds to the project that could be leveraged with other outside funding.

Additional Comments on Metro’s FEIR Responses to City of Burbank

Other Transportation Plan, Policy, and Safety Impacts

The City’s DEIR comment letter stated that the DEIR was inadequate in assessing the proposed projects impact on Olive Avenue vehicular efficiency, and did not disclose whether the project will cause spillover into adjacent neighborhoods. The DEIR further did not assess whether potential BRT improvements may influence street traffic including proposed transit signal priority improvements. In response, Metro indicated that curb-running bus lanes would not have an impact on vehicle travel, and that side-running bus lanes (that convert two vehicle lanes to two bus lanes) would not cause residential spillover traffic onto residential streets because Olive Avenue vehicle traffic will shift to other streets such that the speeds of the remaining traffic on Olive Avenue will not be affected. Because of this, vehicle traffic will not spillover into adjacent residential neighborhoods. Unfortunately no documentation was provided with the traffic diversion analysis included in the FEIR to support this assertion. Given the amount of traffic currently on Olive Avenue, the limited ability for alternative streets to accommodate diverted traffic, and the loss of vehicle capacity caused by the side-running bus lanes, the City believes that the proposed project will cause spillover traffic into residential neighborhoods, which is contrary to Burbank2035 Mobility Element Policy 6.1, which is to “Maintain arterial street efficiency to discourage spillover traffic into residential neighborhoods”. The FEIR is therefore inadequate in evaluating this policy conflict with Burbank2035, and important effects the project will have on adjacent residential neighborhoods is not disclosed to the public or to the Metro Board of Directors.

The City’s DEIR comment letter stated that the DEIR failed to disclose a policy impact with Burbank 2035 General Plan Planned Bicycle Routes, which includes provision for a Class II bike route on Glenoaks Boulevard between Providencia and Alameda Avenue. In response, Metro indicated that the proposed project would operate as mixed-flow on Glenoaks Boulevard between Olive Avenue and Providencia Avenue. This response referenced the wrong segment of Glenoaks Boulevard, and did not address the potential conflict. The proposed project should accommodate the proposed bicycle facility on Glenoaks Boulevard, including accommodating the

implementation of that facility in accordance with the goals and policies of the City's Complete Streets Plan, which could include a buffered or protected bicycle facility that would match the facility planned for Glenoaks Boulevard in the City of Glendale.

Public Service Impacts

The City's DEIR comment letter stated that the DEIR conclusion that the project will not cause impacts to police public services did not include evidence to support this conclusion, and that the DEIR did not disclose whether local police resources would be required to police the project as well as enforce new bus lane or other vehicle code regulations that apply to the project. In response, Metro indicated in the FEIR that the project would not have impacts on police public services because it will not increase population levels necessitating additional police resources. However, the FEIR did not address the City's concern relating to additional police public service resources needed to ensure public safety of the project, other than to indicate that Metro would "develop appropriate enforcement strategies." The City requests that Metro identify how required police public services will be provided for the project and which agency will be expected to bear the costs of these services.

Utility Systems and Roadway Infrastructure

The City's DEIR comment letter stated that the DEIR failed to identify a significant impact to the City's recycled water interconnection with the City of Glendale. In response, Metro indicated that impacts to this facility would be identified as part of the project's design phase. However, the City believe this response is inadequate given the importance of this interconnect and fails to disclose the project's potential impact. Mitigation of this impact could involve redesigning the project in this area to avoid this infrastructure, which could introduce secondary impacts that are not identified as part of the FEIR.

Similarly, the City's DEIR comment letter stated that the DEIR failed to identify the impacts to overhead and underground utilities, drainage, sidewalk widths, street trees, street lights, sidewalk furniture, and landscape. In response, Metro indicated that the project is not anticipated to require the construction or relocation of utilities that could cause an impact because these relocations would be coordinated with utility providers, and a utility base map will be prepared to identify utility conflicts. This response is inadequate because the mere coordination with utility providers is not substantial evidence to support the assertion that no impacts are anticipated.

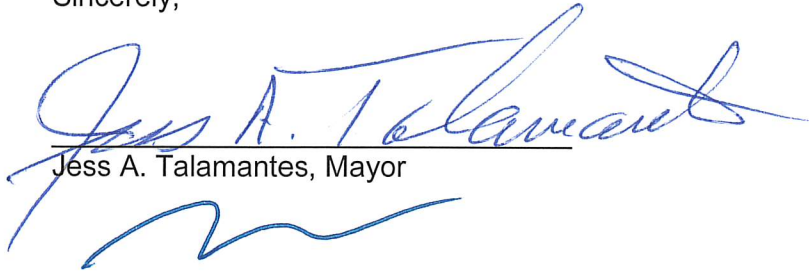
The City's DEIR comment letter stated that the DEIR failed to document the increased annual pavement maintenance costs to the City's streets caused by frequent heavy bus service operating in the curb lane of Olive Avenue, which could require mitigation measures to improve the pavement structural section to accommodate the bus traffic. In response, Metro indicated that the small amount of bus trips added by the project to Olive Avenue relative to the existing traffic on Olive would not be expected to accelerate pavement deterioration. However, given the size and speed of the large buses used for the project as well as their travel on the outer edges of Olive Avenue, the City remains concerned that the project will accelerate the pavement wear of Olive Avenue. The City requests further details on the proposed joint maintenance agreement that would identify the maintenance obligations of both parties in maintaining the project.

The City of Burbank remains committed to the NoHo to Pasadena BRT project and believes it will be an important way for the City and Metro to improve regional transit, provide competitive travel options, improve air quality, and reduce Greenhouse Gas emissions. The City believes that the project's success hinges on its ability to provide an important travel alternative while protecting Burbank neighborhoods from impacts and connecting directly to the Metrolink system. Metro's changes to the project description between the release of the Draft and Final EIRs is responsive

to many of the City's requests. Addressing the remaining concerns and changes expressed in this letter will ensure that this project will be a successful enhancement to the regional transit network and will be compatible with the Burbank neighborhoods that it will travel through.

The Burbank City Council respectfully requests the Metro Board of Directors consider the points raised in this letter as it considers approving the project.

Sincerely,

A handwritten signature in blue ink, reading "Jess A. Talamantes", written over a horizontal line.

Jess A. Talamantes, Mayor

A handwritten signature in blue ink, reading "Konstantine Anthony", written over a horizontal line.

Konstantine Anthony, Vice Mayor

A handwritten signature in blue ink, reading "Bob Frutos", written over a horizontal line.

Bob Frutos, Council Member

A handwritten signature in blue ink, reading "Sharon Springer", written over a horizontal line.

Sharon Springer, Council Member

A handwritten signature in blue ink, reading "Nick Schultz", written over a horizontal line.

Nick Schultz, Council Member