

CITY OF BURBANK
OFFICE OF THE CITY COUNCIL

December 20, 2020

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

**RE: City of Burbank Comments on Draft Environmental Impact Report for the
Metro North Hollywood to Pasadena Bus Rapid Transit Corridor Project**

Dear Members of the Board of Directors:

The City of Burbank wants to thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for Metro's North Hollywood to Pasadena Bus Rapid Transit Corridor Project. As the City of Burbank is located along the proposed corridor and would have several stations located within the city, we are 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. In meeting these goals, the City also wishes to ensure Metro builds the project in a way that ensures that the interests of Burbank's residents and businesses are protected from significant adverse environmental impacts caused by the project. With the release of the DEIR, the City submits the following comments to ensure that the Project's environmental impacts are fully disclosed, analyzed, considered, and mitigated.

Insufficient Range of Project Alternatives

The DEIR fails to include an adequate range of project alternatives to mitigate potential project impacts. Specifically, the nature of Bus Rapid Transit allows for different BRT elements and roadway cross sections to be implemented depending on the local context of the project. The DEIR includes a project alternative with full BRT implementation including dedicated bus lanes and transit priority lanes on virtually the entire corridor. It also includes an "Improved Existing Bus Service Alternative" that would implement regular transit service frequency improvements but would construct no BRT improvements. This "all or nothing" project alternative approach fails to comply with CEQA's requirement to evaluate a reasonable range of feasible alternatives. The DEIR does not acknowledge that the implementation of targeted BRT elements, like bus lanes or queue jumps, installed at high-congestion and other critical areas, can dramatically

improve travel time and potentially meet project objectives without creating a significant adverse environmental impact. To be legally adequate, the DEIR should include a project alternative that includes targeted BRT elements in areas where they would have highest impact to improving transit service in the corridor.

Also, more disruptive BRT elements, such as dedicated bus lanes, have tradeoffs with existing roadway elements like sidewalks, travel lanes and parking. And BRT elements have varying levels of transit improvement relative to adjoining vehicle traffic congestion and delays. The DEIR does not include adequate information on the existing congestion levels and delays on the corridor relative to the proposed transit service for the public and decision makers to evaluate the relative improvement and tradeoffs that BRT elements like dedicated bus lanes have along different segments of the project corridor. The DEIR therefore does not include adequate project alternatives nor information on existing roadway congestion levels to fully disclose the relative benefits, tradeoffs, and impacts that the project has on the environment. In particular, there is insufficient information in the DEIR for the public and decision makers to evaluate whether the proposed bus lanes on Olive Avenue and Glenoaks Boulevard should be implemented as peak-only bus lanes, or whether buses should travel in more mixed-flow segments because existing vehicle congestion and delay in the existing general purpose lanes is low and therefore bus lanes are not warranted.

The project alternative proposes to install a new BRT transit station at the top of the Olive Avenue overpass to directly connect BRT riders to the Downtown Burbank Metrolink Station below. The City of Burbank suggested and proposes this direct connection. However, the implementation of this connection as described in the DEIR introduces substantial transportation policy and safety impacts by reducing travel lanes on Olive Avenue contrary to the Burbank General Plan and creating a pedestrian crossing and travel lane merge movements along an old bridge vertical curve that will likely introduce new safety impacts. The construction of the proposed station is also likely infeasible because any types of heavy construction including station platforms, ADA ramps, signal foundations, pull boxes, and underground conduits will likely compromise the structural integrity of the existing bridge. The DEIR should include a project alternative that implements this station by widening the Olive Avenue bridge to expand pedestrian sidewalks, improving substandard bridge railings, creating a bus turnout and station platform outside of the existing Olive Avenue roadway, and constructing a second elevator on the south side of Olive Avenue to eliminate the proposed hazardous pedestrian crossing. This project alternative would eliminate several project impacts identified above, and would likely contribute to an environmentally superior project alternative.

The Project Alternatives section identifies that the No Project Alternative is environmentally superior, and then identifies the "Improved Existing Bus Service Alternative" (Alternative 2) as the environmentally superior alternative of the remaining two build alternatives. The project alternative is not identified as environmentally superior and the DEIR fails to address how the project alternative meets the stated project objectives better than the environmentally superior alternative to warrant it being chosen

over the environmentally superior Alternative 2. Based on this omission, the public and decision makers are led to believe that Alternative 2 should be selected as the preferred project, rather than the proposed project. As such, the alternatives analysis is legally inadequate.

Transportation Plan, Policy, and Safety Impacts not Identified and Mitigated

The DEIR indicates that the project would have a less-than significant transportation impact because the project does not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. While the proposed project is consistent with some City of Burbank Mobility Element policies related to transit facilities as documented in the DEIR, , the DEIR fails to document several inconsistencies with numerous other Burbank Mobility Element policies related to roadway, transit, bicycle, and pedestrian facilities which are not disclosed in the DEIR. The proposed project is inconsistent with the following transportation program, plans, or policies:

Roadway Policy Impacts

- *Burbank2035 General Plan Mobility Element Roadway Circulation Street Classifications.*

The DEIR fails to disclose the significant adverse impact the project will cause on maintaining the City's circulation network and street classifications. The Burbank General Plan designates Olive Avenue as a Major Arterial (General Plan Exhibit M-2) with five travel lanes. Major arterials should give priority to regional transit and auto traffic, and should encourage good transit and automobile progression using traffic signal timing (General Plan Page 4-11). The DEIR indicates that Olive Avenue would retain two travel lanes on Olive Avenue in each direction, but fails to disclose that the project would remove one travel lane in each direction on the Olive Avenue overpass of Interstate 5, which reduces the number of travel lanes from five lanes to three and conflicts with the General Plan street classification and roadway cross section requirements for major arterials which requires two lanes in each direction. The DEIR is inadequate in disclosing this significant roadway policy impact and in failing to identify appropriate mitigation measures for this impact. The DEIR must disclose congestion and potential impacts to public safety caused by narrowing of Olive Avenue to one lane in each direction. The DEIR must include a project alternative or mitigation measure that implements this station by widening the Olive Avenue bridge to expand pedestrian sidewalks, improving substandard bridge railing, creating a bus turnout and station platform outside of the existing Olive Avenue roadway, and constructing a second elevator on the south side of Olive Avenue to eliminate the proposed hazardous pedestrian crossing.

- *Burbank2035 General Plan Mobility Element Policy 1.2: Recognize that...wholesale changes to street rights-of-way are infeasible.*

The DEIR is inadequate in failing to disclose a roadway policy impact with Burbank General Plan Mobility Element Policy 1.2. The project proposes to

widen the entire length of Olive Avenue by one to two feet through the entire length of the City to accommodate a transit-only bus lane. Burbank2035 General Plan Policy 1.2 does not support "wholesale changes to street rights-of-way," therefore the project is inconsistent with Policy 1.2.

- *Burbank2035 General Plan Mobility Element Policy 3.4: All street improvements should be implemented within the existing right-of-way. Consider street widening and right-of-way acquisition as methods of last resort.* The DEIR is inadequate in identifying roadway policy significant impacts with the Burbank General Plan Mobility Element. The project would require the curb-to-curb street width of Olive Avenue and Glenoaks Boulevard to be widened by up to four feet along the entire length of the project, which conflicts with Mobility Element Policy 3.4. The DEIR does not investigate feasible mitigation measures to address this policy impact, such as project alternatives that preserve the existing street roadway width consistent with this policy. Further, the DEIR does not identify the numerous locations along Olive Avenue where the half-street street right-of-way width is only 40 feet, which may be insufficient to accommodate the proposed project's 36-foot wide half-street width (72-foot total width) without eliminating sidewalks. Providing ADA-accessible sidewalks in these locations may require property acquisition which is not disclosed in the DEIR, and which is inconsistent with Policy 3.4.
- *Burbank2035 General Plan Mobility Element Policy 6.1: Maintain arterial street efficiency to discourage spillover traffic into residential neighborhoods.* The DEIR is inadequate in assessing the proposed project's impact on Olive Avenue and Glenoaks Boulevard arterial street efficiency, and does not disclose whether the project will cause arterial spillover traffic into adjacent residential neighborhoods. The proposed project includes transit signal priority and transit queue jumps at intersections, but does not disclose how these improvements may influence arterial street traffic. In particular, Olive Avenue is a diagonal street that intersects other north-south and east-west arterial streets. Implementing transit system priority signal timing on this diagonal arterial may introduce unacceptable delays on all other north-south and east-west streets near the proposed project, and may prevent the City from synchronizing its other arterial streets. The DEIR must disclose and analyze how potential transit system signal priority will affect the City's arterial traffic signal coordination and synchronization.

Transit Policy Impacts

- *Burbank2035 General Plan Mobility Element Policy 4.1: Ensure that local transit service is reliable, safe, and provides high-quality service to major employment centers, shopping districts, regional transit centers, and residential areas*

The proposed project corridor passes by, but does not serve, the Disney Studio Campus and St. Joseph's Hospital and related medical complexes at the

intersection of Buena Vista Street and Alameda Avenue. Because the proposed project passes near, but does not serve this major employment center, the project conflicts with Burbank General Plan Policy 4.1 which requires transit to serve the City's major employment centers. DEIR should study a route alternative to divert the project alignment onto Alameda Avenue and Buena Vista Street to serve this major employment and community center and including a stop at the Buena Vista Street / Alameda Avenue Intersection.

- *Burbank2035 General Plan Mobility Element Policy 4.3: Improve and Expand Transit Centers; create a new transit center in the Media District*

The Burbank2035 General Plan identifies a future bus transit center to be located within the Burbank Media District, at a location where local and regional bus lines intersect. The proposed project includes a station located where this future transit center is identified. However, the DEIR fails to analyze how the proposed project supports or inhibits the development of this transit center. The DEIR should evaluate how the construction of the proposed project's stop at Hollywood Way / Riverside Drive / Olive Avenue can serve as the foundation for a future bus transit center in the Media District, specifically how the proposed project's station will provide connections to BurbankBus, Metro Local, and Metro Express service in the Media District while supporting the required first-last mile improvements necessary to support the station.

- *Burbank2035 General Plan Mobility Element Policy 4.8: 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.*

The DEIR fails to analyze how the proposed project is compatible with Burbank2035 General Plan Mobility Element Policy 4.8 relating to the project's seamless connection between the Downtown Metrolink Station as well as the City's existing and planned off-street bicycle network that serves the Downtown Burbank Metrolink Station. The proposed transit station on the Olive Avenue overpass does not support a seamless connection to the existing Burbank Channel Class I Bikeway, and the future Chandler Extension Class I Bikeway because it requires eastbound riders to navigate a circuitous route across Olive Avenue and down the existing elevator. The proposed project should promote a more seamless connection to these other transportation systems by implementing this station by widening the Olive Avenue bridge to expand pedestrian sidewalks, improving substandard bridge railings, creating a bus turnout and station platform outside of the existing Olive Avenue roadway, and constructing a second elevator on the south side of Olive Avenue to eliminate the proposed hazardous pedestrian crossing.

The DEIR fails to analyze the proposed project's potential ridership impacts to the existing BurbankBus Pink Route service in conflict with Burbank2035 General Plan Mobility Element Policy 4.8. The Pink Route provides local

service along the Olive Avenue corridor and connects the Universal City Red Line Station and Downtown Burbank Metrolink Station to the Media District. This impact is especially pertinent as the City is being asked to become the primary local transit provider in the corridor due to the NextGen Bus Plan eliminating Metro 155 service.

Pedestrian Policy Impacts

- *Burbank2035 General Plan Mobility Element Pedestrian Transportation Sidewalk Standards*

The DEIR fails to disclose a significant policy impact with Burbank2035 General Plan Mobility Element standard sidewalk width requirements. The project would widen Olive Avenue and Glenoaks Boulevard by one to two feet in both directions to convert the existing on-street parking into a bus-only lane. This would require sidewalk widths on Olive Avenue and Glenoaks Boulevard to be reduced below the standard widths identified in the Burbank2035 General Plan (Table M-2 – Sidewalk Standards, Page 4-21). The sidewalk width standards are generally 15 feet along the project corridor, and the required street widening would reduce these widths to 14 feet. In some locations on Olive Avenue, sidewalk widths would be reduced to 4 feet, which does not meet ADA minimum width standards. The DEIR fails to identify a significant transportation impact, nor does it identify feasible mitigation measures to this significant impact. *Burbank General Plan Mobility Element Policy 9.2: Address the needs of people with disabilities and comply with the requirements of the ADA during the planning and implementation of transportation improvement projects.*

The DEIR fails to disclose a significant policy impact with the Burbank General Plan Mobility Element because the project proposes to reduce sidewalk widths on Olive Avenue in certain segments to four feet wide, which is below the ADA minimum width.

Bicycle Policy Impacts

- *Burbank2035 General Plan Mobility Element Bicycle Routes*

The DEIR fails to disclose a policy impact with the Burbank General Plan Mobility Element Planned Bicycle Routes and the Bicycle Master Plan Top Priority Projects, which both include the addition of Class II bicycle lanes on Glenoaks Boulevard between Providencia Avenue and Alameda Avenue, with connections to the Class III bicycle route on Providencia Avenue. Further, the project precludes the City from connecting this planned facility to the Downtown Burbank Metrolink Station via Glenoaks Boulevard between Providencia Avenue and Verdugo Avenue, which is a bicycle network gap identified in the City's Complete Streets Plan. The DEIR must identify a mitigation measure for this policy impact.

Other Transportation Impacts

The DEIR fails to disclose a potential transportation impact by introducing a hazard due to a geometric design feature. The project proposes to construct a transit station at the top of the Olive Avenue Overpass, and install a signalized pedestrian crosswalk at the crest of the overpass. The DEIR did not analyze of the placement of this pedestrian crossing at the top of a 60 year old overpass with poor vehicle sightlines due to high roadway grades caused by the profile of the overpass. The project proposes to construct two roadway travel lane drops on the overpass immediately approaching the proposed station platform, and the DEIR does not disclose or analyze whether the introduction of this roadway design feature on the existing overpass creates a potentially significant adverse impact. The project also proposes to introduce additional pedestrian traffic travelling to and from the new station platform. These pedestrians will be boarding and alighting buses mixed with through pedestrian traffic on the bridge's existing seven foot sidewalks. These sidewalks are located along bridge railings that are of substandard height (39 inches) separating pedestrian traffic from falling to the Interstate 5 freeway below.

The DEIR fails to analyze whether the proposed station loading platforms with midblock crosswalk on the Olive bridge is feasible. A midblock crosswalk on the Olive bridge is likely hazardous for pedestrians and vehicles due to creating a visibility issue on the bridge's vertical curve. The DEIR did not adequately investigate whether a signalized crosswalk can be constructed on the existing Olive bridge given the types of heavy construction including station platforms, ADA ramps, signal foundations, pull boxes, and underground conduits that will be required and may likely compromise the structural integrity of the existing bridge. The DEIR is inadequate in analyzing these potential safety impacts and identifying mitigation measures for those potentially significant adverse impacts. The DEIR should include a project alternative or mitigation measure that implements this station by widening the Olive Avenue bridge to maintain four travel lanes, expand pedestrian sidewalks, improve substandard bridge railings, creating a bus turnout and station platform outside of the existing Olive Avenue roadway, and constructing a second elevator on the south side of Olive Avenue to eliminate the proposed hazardous pedestrian crossing.

The DEIR fails to analyze a potential transportation impact caused by a hazardous geometric design feature by proposing bus left turn movements to westbound Olive Avenue from the far-most right turn lane of northbound Glenoaks Boulevard. The DEIR does not disclose this potential hazardous condition or identify mitigation measures to reduce potential significant impacts. Making a left turn from the far-most right turn lane also violates California Vehicle Code Section 22100(b) and may cause other drivers to unintentionally copy the same movement, thereby introducing a new hazardous condition for pedestrians and road users.

The DEIR fails to analyze a potential transportation impact caused by a hazardous geometric design feature by proposing to install center-running median bus lanes on Glenoaks Boulevard at the Alameda Avenue and Providencia Avenue

intersections across conflicting left turn movements to these streets. The DEIR does not disclose this potential hazardous condition or identify mitigation measures to reduce potential significant impacts.

The proposed project allows right-turning vehicles to merge with the curb-running bus lane approaching each intersection and allows right turns be made from the bus lane. Existing right turn lanes with protected right turn signal indication cannot be merged with the curb-running bus lane due to the complexity of the signal operation at these locations. Removing the protected right turn indication will compromise vehicular safety at these locations. The DEIR failed to analyze the impact of traffic circulation should these protected right turn lanes be removed.

The DEIR fails to analyze a potential transportation impact caused by hazardous geometric design feature by proposing to integrate the bus stations into the sidewalk area and using a curb extension to facilitate access and pedestrian circulation.

The DEIR fails to adequately analyze if including 11 foot bus only curb lanes adjacent to the existing 10 foot travel lanes on Olive Avenue and Glenoaks Boulevard will create a potentially significant adverse safety impact. The DEIR should analyze how the geometric configuration of BRT elements, such as dedicated lanes, curb extensions, and bus stations may create hazardous geometric design features, particularly where the alignment is required to make left or right turns, enter, exit, and cross freeway ramps, bicycle facilities, and pedestrian crossings at intersections.

Cumulative Impacts Not Fully Disclosed

The DEIR appears to use the "related projects list" method of analyzing potential cumulative impacts. The list of cumulative projects (Table 5-1, Page 5.2) included in the Cumulative Impact section of the DEIR omits several projects in the City of Burbank, including approved entitlements for the City's three major studio campuses. The City of Burbank's cumulative project list can be provided to Metro to add the additional cumulative projects located within ½ mile of the project alignment

The DEIR related projects list includes the City of Los Angeles Colorado Boulevard Specific Plan, but does not include the two City of Burbank Specific Plans that the alignment passes through (Media District and Burbank Center Specific Plans). Further, the Burbank Center Plan is not considered in the Population and Housing Section of the DEIR.

The DEIR related project list includes the unfunded Metro Los Angeles – Glendale – Burbank Feasibility Study, but does not include the funded Antelope Valley Line Improvement Project, which will fund capital improvements to expand Metrolink service to 30 minute, all-day, bi-directional service. The DEIR's failure to include these service improvements as a cumulative project makes the DEIR inadequate in analyzing the need for the BRT project to seamlessly connect to this important regional connection, and

inclusion of this cumulative project would likely provide support for the Olive Avenue / Metrolink transit stop improvements described elsewhere in this comment letter.

The DEIR identifies the Metro / City of Burbank Olive/Verdugo/Sparks intersection improvement project as a related project, but does not identify the conflict the proposed project would have with the City's planned improvement of this intersection, which would construct pedestrian, bicycle, and vehicle channelization improvements that would preclude the installation of bus lanes through the intersection.

The DEIR identifies the City of Burbank Olive Avenue Bridge Improvement project as a related project, but does not disclose that the proposed narrowing of Olive Avenue to one lane in each direction is in conflict with one of the purposes of the bridge improvement, which is to improve operational efficiency while also adding bicycle and pedestrian improvements to the bridge. Constructing a transit stop at the top of the bridge in the middle of the travelled roadway would conflict with this project. These numerous omissions and inconsistencies render the Cumulative Impacts analysis legally inadequate because the findings and conclusions are not supported by substantial evidence.

Aesthetic and Biological Resources Not Addressed

The DEIR identifies that a significant aesthetic impact would occur if the project would "substantially damage scenic resources, including...trees..." and identifies several impacts to existing mature tree landscape elements along the corridor outside the City of Burbank (Page 3.2-14). However, the project does not apply this threshold to the City of Burbank and therefore does not identify impacts to mature street trees in the City of Burbank. In particular, the project would require the removal of several rows of large mature street trees on Olive Avenue and Glenoaks Boulevard in Downtown Burbank. These trees would be removed because the project is required to widen Olive Avenue by one to two feet for the proposed project. By applying the project's aesthetic impact significance thresholds to the City's street trees, the DEIR should identify a significant impact to aesthetic resources in Burbank by removing these trees, and should identify feasible mitigation measures to lessen these impacts. In addition, the DEIR must analyze the removal of these trees as a significant Biological Resources impact given the contribution these mature street trees give to the City's urban forest resources. Without this additional analysis, the Aesthetics and Biological Resources impact analyses are legally inadequate because they are not supported by substantial evidence.

Public Service Impacts Not Identified

The DEIR indicates that the proposed project will cause no impact to police public services because it will not lead to an increase in police service calls or the local jurisdictional service ratio. However, there is no evidence to support this conclusion (Page 4-22). The DEIR states that the project will be subject to Metro's transit police strategy including Transit Services Bureau officers and contracted police services. But it does not state directly if the proposed project will be patrolled and staffed by Metro transit police or local jurisdictional police, and if local police will be contracted to provide

police service. Also, the DEIR is silent on whether local or Metro law enforcement will be required to enforce bus-only lanes and other transit-only facilities, and fails to define the requirements and costs to enforce bus-only facilities. The DEIR fails to adequately identify if the project will pose a significant adverse impact to police service. Therefore, the Public Service impact analysis is legally inadequate because it is not supported by substantial evidence.

Utility Systems and Roadway Infrastructure not Analyzed

The DEIR indicates that the project will have no impact to electric utility systems, but does not document why this statement is true. Metro is proposing to utilize electric transit vehicles for the project, which could require substantial electrical utility system improvements if vehicle charging is expected to occur within the City of Burbank. The DEIR indicates that "the location of charging stations for electric buses would be analyzed and located where sufficient capacity is located" (Appendix S, Page 29) but does not include this analysis in the DEIR. The DEIR is insufficient in determining whether the proposed project will create a significant impact to the City's electrical utility system.

The DEIR fails to identify a significant impact to the City's recycled water interconnect with the City of Glendale located in the Glenoaks Boulevard median south of Alameda Avenue. The proposed project will likely impact this critical recycled water interconnect including hydrants, valves, vacuum/air release valves, meter boxes, and a fiber optic communication pull box. The DEIR should identify this significant impact and identify mitigation measures to mitigate it.

The DEIR fails to identify the impacts caused by several miles of street widening with respect to existing overhead and underground utilities, drainage, sidewalk width, street trees, street lights, sidewalk furniture, landscape, etc. The DEIR should disclose any potential significant impacts to public infrastructure. As such, the Utility Systems impact analysis is legally inadequate because it is not supported by substantial evidence.

The DEIR fails 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 and Glenoaks Boulevard. Identifying impacts to increased pavement wear could require mitigation measures such as strengthening the roadway cross section in the bus lanes to accommodate heavy bus travel. The DEIR also fails to identify maintenance costs for other roadway elements including signs, striping, traffic signals, and other roadway infrastructure. Additional comments related to civil public infrastructure are attached to this comment letter.

Other Project Considerations

The City recognizes that impacts to public parking are not considered CEQA impacts. Nonetheless, the project proposes to eliminate 500 curb parking spaces along Olive Avenue and Glenoaks Boulevard without identifying a parking program or plan to address this lack of curb parking. These parking spaces currently serve a significant amount of

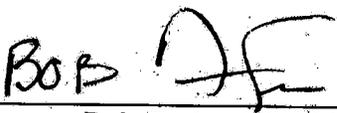
mid-century, single story strip commercial development that does not include on-site parking. Removing parking for these land uses without providing a parking program to address this parking loss would create an economic impact on these strip commercial businesses who rely on this curb parking. Removing all parking inventory for these businesses would impact the business viability and prevent use and re-use of these older buildings. Further, wholesale removal of curb parking would push parking demand into adjacent residential neighborhoods, likely requiring the City of Burbank to implement additional permit parking zones in these residentially-adjacent neighborhoods. The DEIR should disclose this potential economic affect and provide a program or plan to offset the loss of parking caused by the proposed project. The DEIR should also propose project alternatives to the implementation of full-time bus lanes in areas where loss of curb parking will impact adjoining land uses.

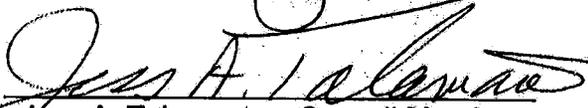
The DEIR fails to disclose if new transit stations will induce additional parking demand around them, especially if parking demand will impact sensitive residential or strip commercial land uses. Bus Rapid Transit is meant to operate similarly to light rail transit, but BRT stations, unlike light rail stations are built without parking. The DEIR should disclose the number of new transit riders at each station who are expected to arrive by automobile and identify potential parking demands caused by the proposed project.

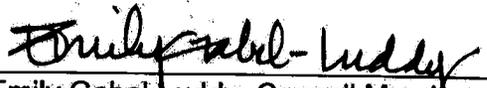
Thank you again for providing an opportunity to comment on the DEIR for the Noho to Pasadena Bus Rapid Transit Corridor Project located in the City of Burbank. If you have any questions regarding the contents of this letter, please feel free to contact David Kriske, Assistant Community Development Director with the Community Development Department, at 818.238.5269 or via email at dkriske@burbankca.gov.

Sincerely,


Sharon Springer, Mayor


Bob Frutos, Vice Mayor


Jess A. Talamantes, Council Member


Emily Gabel-Luddy, Council Member


Timothy M. Murphy, Council Member

Attachment: Memorandum

MEMORANDUM



**PUBLIC
WORKS**

DATE: November 30, 2020

TO: David Kriske, Assistant Community Development Director

FROM: Daniel J. Rynn, Chief Assistant Public Works Director – City Engineer

SUBJECT: Project No. Metro Bus Rapid Transit Project
Located at North Hollywood to Pasadena

Project Description:

On October 26, 2020, Metro released a Draft Environmental Impact Report (DEIR) for its North Hollywood to Pasadena Bus Rapid Transit Project. The Proposed Project would run from the North Hollywood Red/Orange Line Station in the City of Los Angeles through the Cities of Burbank and Glendale and into the City of Pasadena ending at Pasadena City College. Bus Rapid Transit is high capacity, frequent bus service that operates on local streets in both mixed-flow and dedicated bus lanes with fixed transit stops like a rail line. The Proposed Project would operate along a combination of local roadways and freeway sections with various configurations of mixed-flow and dedicated bus lanes depending on location. Attachment 1 shows the project corridor. In Burbank, the route is proposed to operate as a dedicated bus lane along Olive Avenue and Glenoaks Boulevard.

The bus lane would be constructed by generally widening these streets by one to two feet on each side and eliminating on-street parking. Stations are proposed in public right of way on Olive Avenue at Hollywood Way, Alameda Avenue, I-5 Olive overpass / Metrolink Station, and San Fernando. A station is also proposed on Glenoaks Boulevard at Alameda Avenue. The project would be served by electric transit buses.

ENGINEERING DIVISION

General Requirements:

- The City's arterial paving program has identified portions of Olive Ave to be repaved by 2022. Any impacts to the pavement on these segments of Olive Ave will have to be repaired per the City of Burbank Standards.
- Bus pads will be required at all bus stops.
- The Olive Ave bridge currently has two lanes of traffic in each direction. Creating one lane in each direction as a dedicated bus lane may cause additional traffic congestion and additional pedestrian traffic over the bridge and to the Metrolink access point. The DEIR should consider widening the bridge to create the dedicated bus lanes and/or bus turnouts. At a minimum, the sidewalk widths should be increased and the substandard safety barrier rails on both sides of the bridge should be upgraded.

For additional information or questions, please contact Anthony Roman, Civil Engineer Associate, at (818) 238-3945.

Checked by: Anthony Roman

Date: November 18, 2020

WATER RECLAMATION AND SEWER

SECTION 2.9 – CONSTRUCTION:

- Proposed stations/stops located near City of Burbank and/ or County of Los Angeles catch basins must include trash receptacles.

SECTION 2.10 – PERMITS AND APPROVALS:

- Altering any part of the existing storm drain infrastructure requires approval and permits from the City of Burbank and/ or the County of Los Angeles.

SECTION 4.1.3 – HYDROLOGY AND WATER QUALITY:

- In addition to SWPPP and County SUSMP requirements, the City of Burbank has a Low Impact Development (LID) ordinance. Due to the proposed construction activities, revise document to include the aforementioned City LID ordinance.

SECTION 4.1.9 – UTILITIES AND SERVICE SYSTEMS:

- Best Management Practices shall apply to all construction projects and shall be required from time of land clearing, demolition or commencement of construction. Refer to BMC 9-3-407 for additional information.

- Certain construction and re-construction activities on private property will need to comply with post-construction Best Management Practices (BMPs), which include Sections 8-1-1007 and 9-3-414.D of the BMC authorizing the City to require projects to comply with the Standard Urban Stormwater Mitigation Plan provisions and the City's **Low Impact Development** (LID) ordinance. For questions on these requirements, please contact the City's Building Division at (818) 238-5220.

- The project will disturb more than 5,000 SF within the City's transportation corridors (i.e., public streets, parkway areas, and public parking) and as such, is subject to the City's Green Streets Policy requirements. This policy can be reviewed at the following address:
http://file.burbankca.gov/publicworks/OnlineCounter/permits/app_docs_procedures/greenstreet/gspolicy.pdf

For additional information or questions, please contact Eden Lopez at (818) 238-3930.

Checked by: Stephen Walker

Date: November 19, 2020

TRAFFIC ENGINEERING

General Requirements:

CONDITIONS:

- An operational analysis shall be performed to show traffic congestion caused by narrowing of Olive Avenue to one lane in each direction.

- The DEIR should provide a feasibility study to address the impacts and review whether the proposed station loading platforms with midblock crosswalk on the Olive bridge is feasible. Midblock crosswalk on the Olive bridge is hazardous for pedestrians and vehicles due to visibility issue on the vertical curve. A signalized crosswalk cannot be constructed on the existing Olive bridge because any types of heavy construction including station platforms, ADA ramps, signal foundations, pull boxes, and underground conduits will compromise the structural integrity of the existing bridge. Metro may need to reconstruct the bridge to maintain 4 travel lanes with bus turnouts or dedicated bus lanes, sidewalk widening, and new pedestrian signals.

- An operational analysis shall be performed to show traffic congestion caused by narrowing of Olive Avenue to one lane in each direction.
- The DEIR also fails to identify the feasibility of street widening with respect to existing overhead and underground utilities, drainage, sidewalk width, sidewalk furniture, landscape, etc.
- The DEIR should provide a feasibility study to address the impacts and review whether the proposed station loading platforms with midblock crosswalk on the Olive bridge is feasible. Midblock crosswalk on the Olive bridge is hazardous for pedestrians and vehicles due to visibility issue on the vertical curve. A signalized crosswalk cannot be constructed on the existing Olive bridge because any types of heavy construction including station platforms, ADA ramps, signal foundations, pull boxes, and underground conduits will compromise the structural integrity of the existing bridge. Metro may need to reconstruct the bridge to maintain 4 travel lanes with bus turnouts or dedicated bus lanes, sidewalk widening, and new pedestrian signals.
- Making a left turn from the far-most right turn lane also violates California Vehicle Code Section 22100(b) and may cause other drivers to unintentionally copy the same movement, thereby introducing a new hazardous condition for pedestrians and road users.
- The proposed project allows right-turning vehicles to merge with the curb-running bus lane approaching each intersection and allows right turns be made from the bus lane. Existing right turn lanes with protected right turn signal indication cannot be merged with the curb-running bus lane due to the complexity of the signal operation at these locations. Removing the protected right turn indication will compromise vehicular safety at these locations. The DEIR failed to analyze the impact of traffic circulation should these protected right turn lanes be removed.
- The DEIR fails to analyze a potential transportation impact caused by hazardous geometric design feature by proposing to integrate the bus stations into the sidewalk area and using a curb extension to facilitate access and pedestrian circulation. The DEIR does not disclose traffic congestion as a result of the dedicated bus lanes in combination with narrowing of the roadway at bus stations via curb extension.
- The DEIR showed cross sections but fails to identify locations where existing lane width is substandard and fails to analyze the potentially hazardous condition as a result of addition of dedicated bus lanes in the already congested and substandard travel lanes. City of Burbank requires minimum 10.5 feet travel lane and 12 feet curb lane where there is transit service. The DEIR should analyze how the geometric configuration of BRT elements, such as dedicated lanes, curb extensions, and bus stations may create hazardous geometric design features,

particularly where the alignment is required to make left or right turns, enter, exit, and cross freeway ramps, bicycle facilities, and pedestrian crossings at intersections. Should curb parking be modified to provide a dedicated bus lane or queue jump, the project DEIR should analyze how these elements may reduce travel lanes below 10.5 feet, curb lanes below 12 feet.

For additional information or questions, please contact Vikki Davtian, Principal Engineer – Traffic, at (818) 238-3922.

Checked by: Vikki Davtian

Date: November 30, 2020

FIELD SERVICES

General Comments:

Utilities and Service Systems:

- The proposed project would utilize electric-powered vehicles, which may require recharging using electrical networks. The project should analyze the potential to create electrical system impacts associated with powering required transit vehicle charging stations located in the City of Burbank.
- The proposed project would potentially conflict with, or require the relocation/reconstruction of, storm water drainage facilities in roadways along the project's alignment. The Project DEIR should analyze the project's impact of City and County storm water facilities within the project alignment.
- The unique nature of a BRT project, whereby a regional transit agency constructs capital improvements and operates transit vehicles on public infrastructure owned by another agency, could result in additional impacts to City of Burbank public service systems. In particular, the project DEIR should identify impacts to roadway maintenance of local streets including the increased maintenance needed for pavement, signage, striping, station maintenance, lighting, and other roadway infrastructure used by the project and owned and maintained by the City. Also, the DEIR should analyze right-of-way impacts to land adjacent to streets along the alignment, including any land acquisition required for stations or roadway widening. Also, the City seeks clarification on whether public easements necessary for the project will be required within City right of way.

Transportation:

- Refer to attached letter.

For additional information or questions, please contact Public Works Field Services at (818) 238-3800.

Checked by: John Molinar

Date: November 23, 2020