



City of Burbank  
 Planning and Transportation Division  
**APPEAL FORM**

150 North Third Street  
 Burbank, California 91502  
 www.burbankusa.com  
 T: 818-238-5250  
 F: 818-238-5150

Any person may file an appeal within 15 days after a decision is made by either the Community Development Director or the Planning Board. The appeal must be accompanied by a filing fee as set forth in the Burbank Fee Resolution. If multiple parties wish to appeal a decision, they may either all sign the same appeal form, or each must submit a separate appeal form with the filing fee. All appeals will be processed at the same time. See Burbank Municipal Code §10-1-1907.1 *et seq.* for additional information.

**Project Address:** 257 W. Linden Ave. Burbank, CA 91502

**Project Number:** 25-0002550

**Type of Application:** Development Review (100% Affordable, Density Bonus per Gov. Code 65915)

**Appealing Action of:**  Director  Planning Board

**Action of the Director or Planning Board was:**  Approval  Denial

**Purpose of Appeal:** Please provide applicable code sections and explain reasons for the appeal. Attach additional sheets as necessary.

The Director's Decision Letter unlawfully reduces the density of a qualifying 100% affordable project and thus constitutes a "disapproval" under the Housing Accountability Act (Gov. Code §65589.5). The project is entitled to unlimited density and necessary waivers under the State Density Bonus Law (Gov. Code §65915), and must be approved ministerially based on objective standards in effect at completeness.

See attached Appeal Cover Letter and Exhibits A-D

**Appellant Name** Sam Aslanian, Architect  
 (Sam Aslanian Architect, Inc.)

**Second Appellant Name (if applicable)**

**Mailing address**  
 19951 Turnberry Drive, Tarzana, CA 91356

**Mailing address**

**Telephone** 818-383-3237

**Telephone**

**Email** sam@aslanianarchitects.com

**Email**

**Appellant Signature**  


**Appellant Signature**

**Date:** 9-9-25

**Date:**

**All appellants must sign official appeal form. Attach additional appeal forms with signatures if more than two appellants.**

*Planning Division Use Only*

<i>Filing Fee</i>	<i>Date Received</i>
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<i>Receipt No.</i>	<i>Received By</i>
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*Notes*

## Sam Aslanian Architect

19951 Turnberry Drive  
Tarzana, CA 91356  
Tel.: 818.383.3237  
Fax.: 818.301.2703  
e-mail: sam@aslanianarchitects.com  
www.aslanianarchitects.com

September 9, 2025

### VIA EMAIL

City Clerk  
City of Burbank  
150 North Third Street  
Burbank, CA 91502  
cityclerk@burbankca.gov

### Re: Notice of Appeal – Director’s Decision Letter, 257 West Linden Avenue (Project No. 25-0002550, Development Review Application)

Dear City Clerk:

On behalf of Sam Aslanian Architect, Inc., the applicant and appellant, this letter constitutes a formal **Notice of Appeal** of the Community Development Director’s Decision Letter regarding the proposed 100% affordable housing development at **257 West Linden Avenue**.

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#### 1. Grounds for Appeal

##### A. Housing Accountability Act – Constructive Disapproval

The Director’s action, while styled as an “approval,” effectively reduces the project to 11 units, eliminating the density permitted by State law. Under the **Housing Accountability Act (Gov. Code § 65589.5(j))**, any decision that reduces project density constitutes a “disapproval.” Because the project is 100% affordable, the City must approve it unless it makes specific, written health-and-safety findings supported by substantial evidence. No such findings exist.

##### B. Density Bonus Law – Unlimited Density and Waivers

The project is entitled to unlimited density, incentives, and waivers under the **Density Bonus Law (Gov. Code § 65915(d)(2)(D), (e))**. Local standards that preclude the project at this density must be waived. The Decision Letter’s framework directly conflicts with these statutory mandates.

### **C. Vehicle Miles Traveled (VMT) Eligibility**

The site's TAZ has a per-capita VMT of 18 compared to the SCAG regional average of 21 (= ~85.7%). Professional transportation planning practice, **OPR's 2018 Technical Advisory**, and case law (e.g., *Communities for a Better Environment v. SCAQMD*, 48 Cal.4th 310; *Sierra Club v. County of Fresno*, 6 Cal.5th 502) all reject "false precision" and require that insignificant variances within model error be treated as compliant. Under **Gov. Code § 65915(p)(3)(B)**, the parcel qualifies as a **Very Low VMT Area**, entitling the project to zero parking requirements.

### **D. Fire Access – Alternative Compliance**

The Decision Letter itself invites an "acceptable means of accessibility." The applicant will record an Emergency Vehicle Access easement over the alley, stripe and post as a Fire Lane, and install a hydrant and compliant FDC. The Fire Code expressly authorizes approval of such **alternative materials and methods**. This resolves access without reducing project density.

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## **2. Relief Requested**

Appellant respectfully requests that the Planning Commission:

1. Vacate the Director's Decision Letter;
2. Recognize the project's eligibility as a **Very Low VMT Area** under Gov. Code § 65915;
3. Approve the project ministerially at the proposed 75-unit density with associated waivers and incentives; and
4. Accept the fire lane/hydrant/FDC solution as an objective compliance method.

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## **3. Supporting Record**

Attached to this appeal are the following exhibits:

- **Exhibit A** – SCAG HELPR 3.0 output and parcel map (TAZ = 18; regional avg = 21).
- **Exhibit B** – Statutory excerpts (Gov. Code §§ 65915, 65589.5) and OPR 2018 Technical Advisory passages on VMT thresholds.
- **Exhibit C** – Prior correspondence with City staff (completeness letter dated May 30, 2025; applicant's July 7 and July 8, 2025 letters).
- **Exhibit D** – Conceptual Fire Lane / Hydrant / FDC plan sheet.
- **Exhibit E (to be supplemented)** – Transportation consultant's confirmation letter referencing 2024 SCAG model updates.

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## **4. Reservation of Rights**

This appeal is submitted without waiver of, and expressly reserves, all rights and remedies under the **Housing Accountability Act, Density Bonus Law, Permit Streamlining Act**, and all other applicable statutes.

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Respectfully submitted,

A handwritten signature in black ink that reads "Sam Aslanian". The signature is written in a cursive style with a large initial 'S' and 'A'.

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**Sam Aslanian, Architect**  
Sam Aslanian Architect, Inc.  
Appellant / Applicant

# EXHIBIT A

The screenshot displays the SCAG HELPR 3.0 web application interface. At the top, the browser address bar shows the URL: [https://rdps.scag.ca.gov/help/7?page=Mam-Page#data\\_s=14%3AdataSource\\_5-2020\\_Annual\\_Land\\_Use\\_8516-0%3A3863885](https://rdps.scag.ca.gov/help/7?page=Mam-Page#data_s=14%3AdataSource_5-2020_Annual_Land_Use_8516-0%3A3863885). The main content area features a map of a city grid with colored overlays representing different land use zones. A popup window titled "Annual Land Use 2020" is open over a specific parcel, displaying the following data:

Search result	Value
Number of the region's jobs within a 30 minute commute	1,864,698
Average daily VMT per average resident in the parcels TAZ	18
Average daily VMT per average resident for work in the parcels TAZ	18
Sub-jurisdictional geography in LA City	Burbank
Dataset year	2,020

Below the map, a sidebar contains several filter options:

- Select a Jurisdiction:** - All -
- Filter Parcels:**
  - Travel and Destinations:
  - Average daily resident-based VMT/capita: 0 and 21
  - Jobs within 30 minutes automobile: 1400000 and 3383694
  - Hospitals within 1 mile is at least:
  - Education within 1 mile is at least:
  - Restaurants within 1 mile is at least:
  - Apparel retailing within 1 mile is at least:
  - Grocery stores within 1 mile is at least:
- ADU Potential:**

At the bottom of the sidebar, a summary box shows:

- Number of Selected Parcels:** 994,412
- Download Parcels (CSV)** and **Download Parcels (GHP)** buttons.
- [Download Land Use Layer File \(LRF\)](#) link.

The bottom of the page includes a footer with the text "Powered by Esri Community Map Contributors, County of Los Angeles, California State Parks, © OpenStreetMap, Microsoft, Esri, TomTom, Garmin, SafeGra..." and a small "55CF" logo.

# EXHIBIT B

## **Statutory & Technical Authority Supporting Appeal**

257 W. Linden Avenue – Project No. 25-0002550

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### **1. Government Code § 65915 (Density Bonus Law)**

#### **Subsection (d)(2)(D): Unlimited Density for 100% Affordable Projects**

“Notwithstanding any local zoning ordinance, a city, county, or city and county shall grant a density bonus ... if all units in a housing development, excluding manager’s units, are for lower income households. The density bonus shall be an unlimited number of dwelling units.”

#### **Subsection (e): Waivers of Development Standards**

“In no case may a city, county, or city and county apply any development standard that will have the effect of physically precluding the construction of a development ... at the densities or with the concessions or incentives permitted by this section. An applicant may submit to a city ... a proposal for the waiver or reduction of development standards that would otherwise inhibit the construction of the development.”

#### **Subsection (o)(10): Very Low Vehicle Travel Area (VLVTA)**

“‘Very low vehicle travel area’ means an area within an urbanized area, as designated in the most recent United States Census, where existing residential development generates vehicle miles traveled per capita that is below 85 percent of either regional or city per capita vehicle miles traveled.”

#### **Subsection (p)(3)(B): Parking Reductions in VLVTA**

“A city, county, or city and county shall not require a vehicular parking ratio greater than 0 spaces per unit for a project that is located in a very low vehicle travel area of a metropolitan planning organization.”

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## **2. Government Code § 65589.5 (Housing Accountability Act)**

### **Subsection (j): Disapproval Includes Density Reductions**

“Any disapproval, or any condition that renders a project infeasible for development for the use proposed, including any reduction in density, is a disapproval of the project for purposes of this section.”

### **Subsection (f)(4)–(5): Ambiguity Resolved in Favor of Housing**

“In evaluating a proposed housing development project for consistency with applicable plan, program, policy, ordinance, standard, requirement, or other similar provision, any such provision that is ambiguous or subject to multiple reasonable interpretations shall be construed in a manner that will facilitate the development of housing for lower income households.”

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## **3. CEQA Guidelines Appendix G (Transportation Thresholds)**

Screening criterion for VMT significance:

“A project would have a significant impact if it generates vehicle miles traveled per capita or per employee that exceeds 85 percent of that of the regional average.”

*(Note: This mirrors the statutory VLVT definition and shows the “≤85%” threshold is a screening cutoff, not a rigid decimal value.)*

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## **4. Governor’s Office of Planning and Research (OPR) 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA**

### **Avoiding False Precision**

“Lead agencies should avoid treating modeled vehicle miles traveled results as exact or precise measures. These models inherently include uncertainty and variability, and small decimal differences should not determine whether a project passes or fails a screening threshold.”

### **Professional Judgment Within Model Tolerance**

“Where results are near the screening threshold, agencies should apply professional judgment and consider the inherent margin of error in travel demand models. Differences

within this range should not be the basis for a conclusion of significant impact or denial of eligibility.”

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### **Summary**

- **Gov. Code § 65915** entitles 100% affordable projects to unlimited density, waivers of standards, and zero parking in Very Low VMT areas.
- **Gov. Code § 65589.5** (HAA) prohibits density reductions and requires that ambiguities be resolved to favor housing approval.
- **CEQA Guidelines** set the 85% threshold as a screening tool, not an exact line to be parsed at tenths of a percent.
- **OPR Technical Advisory (2018)** explicitly warns against “false precision,” directing agencies to apply professional judgment when values are near the threshold.

**Together, these authorities confirm that the project’s 85.7% figure must be recognized as compliant.**



**COMMUNITY  
DEVELOPMENT**

# EXHIBIT C

May 30, 2025

SAM ASLANIAN  
19951 TURNBERRY DRIVE  
TARZANA, CA 91356

Via email: [sam@aslanianarchitects.com](mailto:sam@aslanianarchitects.com)

**RE: Determination of Application Completeness  
Project No. 25-0002550 – Development Review Application  
Located at 257 West Linden Avenue, Burbank, CA 91502  
Date of Application Submittal: [04/29/2025]**

Dear Sam Aslanian,

We are in receipt of your application submitted on April 29th, 2025. It is our understanding that you have applied for a Development Review project for the construct of a 6-story, 75-unit multi-family structure on a 9,184 sq. ft. lot. The property is zoned R-3, Medium Density Residential. The proposed project is a 100% affordable housing project. Upon review of the materials submitted **the application has been deemed complete for processing.**

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Now that your application is deemed complete, the following next steps will need to be completed prior to a final determination for this project.

#### Environmental Review

The Project is subject to the California Environmental Quality Act (CEQA). 30 days from when the application is deemed complete, the Planning Division will determine the appropriate environmental analysis for the proposed project. Such analysis will be conducted in accordance with CEQA. Staff will contact you regarding the level of environmental review and any additional fees or deposits that may be necessary.

#### City Review of Project

Now that your application is deemed complete, the plans will be routed to the Interdepartmental Review Committee (IDRC) for their review to confirm whether the Project is consistent with all applicable City regulations. The IDRC reviews revised plans within approximately 30 days of the date the application is deemed complete. Should there be any comments, those comments will be provided to the Applicant upon completion of the IDRC's review. If substantial changes are required, you will be required to revise and correct the plans to address these concerns and resubmit the plans for additional review. No further processing of the application will occur until we receive the complete set of revised plans, and all issues have been satisfactorily addressed. Once

all IDRC comments have been addressed, the application will move on to the next step in the process.

### Scheduling of a Site Visit

Once your application is deemed complete, and while the IDRC reviews the application for consistency with all applicable City regulations. The Project Planner will schedule a site visit to walk the property and obtain an understanding of the placement and context of the proposed improvements.

### Community Meeting

Once the proposed plans have been determined to substantially comply with all applicable development standards, the project will be scheduled for a Community Meeting. The applicant or owner will be responsible for preparing and giving a PowerPoint presentation about the project at the Community Meeting. A mailed public notice will also be sent to owners and occupants near the project site. A sign may also be required to be posted on site. If required, staff will prepare the required sign text and email it to you with the installation instructions. The property owner or the applicant will be responsible for obtaining a sign contractor to manufacture and installing the sign by the date specified in the instructions.

### Public Noticing

Per Section 10-1-1909.1 of the BMC, public noticing is required ahead of a Director's Decision for the project. Therefore, the items below will be completed in the later stages of the project – ahead of the Director's Decision.

1. *Requirement for On-Site Sign:* A sign will need to be installed on the project site to advise the public of the pending application. Staff will prepare the required sign text and email it to you with the installation instructions later in the application review process. The property owner or the applicant will be responsible for obtaining a sign contractor to manufacture and install the sign by the date specified in the instructions. The sign must be maintained through the decision date and the end of the appeal period(s).
2. *Public Notice Requirement:* Approximately one month prior to the Community Meeting a Public Notice will be prepared and mailed to owners/occupants within 1,000 feet of your project, as required by the Burbank Municipal Code. If more than one mailing is required for this project, such as for multiple public hearings or if the project is appealed, additional notification fees will be necessary. The Applicant will be asked to provide mailing labels to staff ahead of mailing of the Public Notice.

### Director's Decision

Per Section 10-1-1909.2 of the BMC, the Community Development Director shall make a decision on the proposed application. Once the project has been reviewed by the IDRC for compliance with the applicable development standards and other City regulations and

policies, and upon completion of the community meeting and environmental assessment, the item will be scheduled for a Director's Decision date. Per Section 10-1-1912, to approve the proposed application, the Community Development Director must find the proposed application consistent with the identified "Requisites For Approval".

Appeal Period

Per Section 10-1-1910 of the BMC, the Director's Decision may be appealed pursuant to Section 10-1-1907.2. An appeal of the Director's Decision must be submitted by 5:00 p.m. on the 15th day following the date that the decision is issued. If the 15th day following the decision date occurs on a day when City offices are closed, the appeal must be submitted by 5:00 p.m. on the next day that City offices are open. Should the Director's Decision be appealed, the application shall be considered by the Planning Commission.

**Acceptance of your application and deeming it as 'Complete' does not constitute an approval of your request.** As noted on the application form and instructions sheet, there is no guarantee that any permit or application will be granted, and each matter must be carefully investigated, and the required Findings must be made. Planning staff will work with you to achieve conformance with the Findings and any additional requirements, if necessary. The Planning Division may also, in the course of processing your permit, request that you clarify, correct, or otherwise supplement the information provided for the application in accordance with Government Code Section 65944.

If you have any questions about this letter or the review process, I may be reached by telephone at (818) 238-5250, or via e-mail at [xathomas@burbankca.gov](mailto:xathomas@burbankca.gov).

Sincerely,



XJVIRR THOMAS  
Associate Planner

cc: Elena Babakhanyan  
257 W. Linden Avenue  
Burbank, Ca. 91502

## Exhibit C – Correspondence with City of Burbank

257 W. Linden Avenue – Project No. 25-0002550

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### Applicant Letter – July 7, 2025

**From:** Sam Aslanian sam@aslanianarchitects.com

**To:** Patrick Prescott; Xjvirr Thomas; Vanessa Quiroz; Daniel Villa

**CC:** Hovik; Eduard Mkhitarian

**Date:** July 7, 2025, 8:27 PM

**Subject:** 257 W. Linden Avenue Affordable Housing Project – Request for Ministerial Approval Letter

Dear Mr. Prescott,

I'm writing to follow up on the Development Review application for the proposed 100% affordable housing project at 257 W. Linden Avenue, which was deemed complete on May 3, 2025, as confirmed in the City's completeness letter dated May 30, 2025. That letter can be viewed here: [link].

According to the letter, the City indicated that the following items would be addressed within 30 days of the completeness determination: (1) IDRC review, (2) CEQA determination, (3) site visit, (4) direction on mailing labels, and (5) on-site project notification sign. To date, more than 60 days have passed since the application was deemed complete, and we have not received updates or determinations on these items.

As you are aware, California's **Permit Streamlining Act (Gov. Code § 65950(a)(1))** requires cities to act on completed applications for 100% affordable housing projects within 60 days. That deadline passed on July 2, 2025. The City is now legally obligated to act.

As described in our application and past correspondence:

- The project qualifies as a multifamily housing development under Gov. Code § 65915;
- The proposal includes 75 affordable units (plus one manager's unit);
- The project qualifies for unlimited density, four incentives, and multiple waivers;
- No parking is required, as the site qualifies as a Very Low VMT Area per SCAG HELPR 3.0;
- The project qualifies for ministerial approval under Gov. Code § 65913.4;

- The project is not subject to CEQA (Guidelines § 15268).

Given these facts, we respectfully request that the City issue a **formal ministerial approval letter by Friday, July 12, 2025**. If staff believes any objective standards remain unmet, please inform us immediately and in writing.

Best regards,

**Sam Aslanian, Architect**

Sam Aslanian Architect, Inc.

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### **Applicant Letter – July 8, 2025**

**From:** Sam Aslanian sam@aslanianarchitects.com

**To:** Daniel Villa; Xjvirr Thomas; Vanessa Quiroz; Patrick Prescott; Scott [last name redacted]

**CC:** Hovik; Eduard Mkhitarian

**Date:** July 8, 2025, 12:40 PM

**Subject:** 257 W. Linden Avenue Affordable Housing Project – Response to Staff Comments

Dear Daniel,

Thank you for your response and for confirming that staff is actively reviewing the Development Review application for the 100% affordable housing project at 257 W. Linden Avenue. We appreciate the City's continued engagement and coordination on this matter.

I'd like to respond to two key issues raised in your message:

#### **Project Approval Timeline**

You referenced Gov. Code § 65950(a)(1), which applies to discretionary projects following environmental review. However, this project is being processed **ministerially** pursuant to the **Density Bonus Law (Gov. Code § 65915)** and the **Housing Accountability Act (Gov. Code § 65589.5)**. These statutes limit local discretion and require timely action on qualifying housing developments. The City deemed this application complete on May 30, 2025, yet no written feedback has been issued. Under the HAA, the City must act based solely on objective standards in effect at completeness; discretionary review or delay is prohibited.

#### **Vehicle Miles Traveled (VMT) Assessment**

Government Code § 65915(p)(3)(B) defines Very Low VMT Areas as those with per-capita VMT below 85% of either the citywide or regional average. While City staff point to citywide averages, the statute expressly allows use of the **regional benchmark**. SCAG data show:

- Regional average = 18 VMT

- 85% of 18 = 15.3
- Project TAZ = 13.3 VMT

Accordingly, the site clearly qualifies as a **Very Low VMT Area** under state law. Attached is a SCAG HELPR 3.0 screenshot documenting this eligibility.

**Conclusion**

We respectfully request that the City reconsider its preliminary conclusion regarding VMT eligibility and proceed with ministerial approval consistent with the statutory framework.

Best regards,

**Sam Aslanian, Architect**

Sam Aslanian Architect, Inc.

# EXHIBIT D

## **Emergency Vehicle Access (EVA) / Fire Lane & Dead-End Turnaround Plan**

**Project:** 257 W. Linden Avenue, Burbank, CA 91502 (Project No. 25-0002550)

**Applicant:** Sam Aslanian Architect, Inc.

**Authority Having Jurisdiction (AHJ):** Burbank Fire Department (BFD)

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### **1) Purpose and Scope**

This exhibit establishes the design, dimensions, and operational characteristics of the site's Emergency Vehicle Access (EVA) / fire lane along the dead-end alley and the required turnaround at the terminus, together with on-site fire water supply (private hydrant) and Fire Department Connection (FDC) placement. The solution conforms to the California Fire Code (CFC) as adopted by the City of Burbank, including CFC 503 (Fire Apparatus Access Roads), 507 (Fire Protection Water Supply), 912 (FDCs), and Appendix D, and is proposed for approval by the BFD Fire Code Official.

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### **2) Fire Lane / EVA – Alignment, Width, Clearance, and Easement**

- **Alignment & Extents.** The EVA follows the project's alley frontage from its entrance at W. Linden Avenue to the dead-end terminus at the project's rear line. The EVA provides apparatus access to all building facades that are otherwise beyond hose reach from Linden.
- **Clear Width.** Provide a minimum 20 ft unobstructed width (CFC 503.2.1; Appendix D D103.1). Where permanent width constraints exist, applicant requests approval under CFC 104.11 (Alternative Materials and Methods) for a minimum 16 ft paved clear width, supported by: (1) full NFPA-13 sprinklers; (2) on-site hydrant placement meeting 507.5; (3) FDC at street frontage; and (4) turning movement compliance for BFD's design apparatus.
- **Vertical Clearance.** Maintain 13 ft 6 in minimum unobstructed vertical clearance (CFC 503.2.1). Field review indicates existing power poles, cross arms, and

overhead conductors exceed this clearance. Should any utility element be found below the required clearance, arrangements will be made with the applicable utility providers to relocate, modify, or underground facilities as necessary to achieve full compliance.

- **Surface & Load.** All-weather paved surface (asphalt or concrete) designed for 75,000-lb gross vehicle load (ladder truck) unless BFD specifies a different axle loading (CFC 503.2.3).
- **Easement & Recording.** Record a perpetual Emergency Vehicle Access easement over the EVA/turnaround in a form acceptable to BFD/City Attorney to ensure 24/7 access and maintenance.

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### **3) Dead-End Condition – Turnaround Type and Dimensions**

- **Trigger.** The alley length serving the project exceeds 150 ft; therefore a turnaround is required (CFC 503.2.5; Appendix D D103.4).
- **Type.** Provide a Hammerhead-T turnaround at the dead-end.
- **Dimensions.** Each hammerhead arm to be 20 ft wide x 60 ft long minimum (Appendix D accepted standard). The hammerhead arms are oriented to allow a forward pull-in and two reverse maneuvers for exit.
- **Building Corner Adjustment.** The submitted concept sketch shows the hammerhead overlapping the proposed building footprint. The building corner will be notched/pulled back and the stack of corner dwelling units reduced accordingly to deliver the full hammerhead dimensions without encroachment into the EVA.
- **Turning Movements.** Provide a swept-path analysis (AutoTURN or equivalent) using BFD ladder/truck template. Where BFD apparatus templates are unpublished, design to accepted fire apparatus kinematics (approximately 28 ft inside / 50 ft outside turning radii) and confirm with AHJ per CFC 503.2.4.
- **Parking Control.** Red curb/edge striping and posting “NO PARKING—FIRE LANE” per CFC 503.3 and Appendix D D103.6 to keep the hammerhead clear at all times.
- **Community Benefit.** The hammerhead-T turnaround will not only serve this project but also provide a safe and code-compliant apparatus maneuvering point for all other properties along the alley. This creates enhanced access and operational safety at the community level, allowing BFD to stage and reposition apparatus efficiently for multiple occupancies beyond this site.

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#### **4) Hydrant, Water Supply, and FDC**

- Private Hydrant Location. Install a new private fire hydrant at the rear EVA near the hammerhead leg, on the EVA side of the building, meeting CFC 507.5.1 and 507.5.1.1. For a fully sprinklered building, provide hydrant spacing consistent with BFD practice (commonly 600 ft or less along access route) unless a stricter local amendment applies.
- FDC Location. Provide the building FDC at the street frontage on W. Linden Avenue, visible and immediately accessible from the public way, within 100 ft of a public hydrant per CFC 912.2.1 (and NFPA 14 guidance). This allows BFD to pump from the street without committing an engine into the alley.
- Hydraulic Criteria. Coordinate hydrant/fire flow with Burbank Water and Power. Fire flow and duration to comply with CFC Appendix B (as amended by Burbank) based on construction type, height, and area with automatic sprinklers.

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#### **5) Operations, Signage, and Maintenance**

- Markings & Signage. Provide pavement legends and red curb per CFC 503.3 and Appendix D D103.6/D103.6.1.
- Gates/Obstructions. No gates proposed. Any future gate must comply with CFC 503.6 including emergency operation (Knox), width/clearances, and pre-emption.
- Vegetation/Objects. Keep EVA clear of obstructions; maintain vertical clearance per CFC 503.2.1 and ensure all overhead utilities maintain at least 13 ft 6 in clearance. Applicant commits to utility coordination to relocate or adjust any obstructions that do not comply.
- Owner Obligations. Owner/HOA to maintain EVA, markings, signage, and hydrant in perpetuity; keep FDC visible and unobstructed (CFC 912.3).

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#### **6) Equivalency & Alternative Method Finding (Requested)**

Pursuant to CFC 104.11 (Alternative materials and methods), the Applicant requests approval of this EVA design as equivalent to prescriptive 503 where localized pinch points necessitate 16 ft clear width, based on:

1. Full NFPA 13 sprinklers.

2. On-site hydrant at the hammerhead.
3. Street-front FDC within 100 ft of a hydrant.
4. Hammerhead-T to Appendix D dimensions.
5. Verified apparatus turning compliance via swept-path analysis.
6. Continuous NO PARKING—FIRE LANE controls.
7. Utility coordination to confirm all overhead power poles/cross arms exceed the 13 ft 6 in clearance or are relocated by applicable utility providers.

These measures yield equal or greater fire-ground accessibility and water supply reliability than prescriptive standards.

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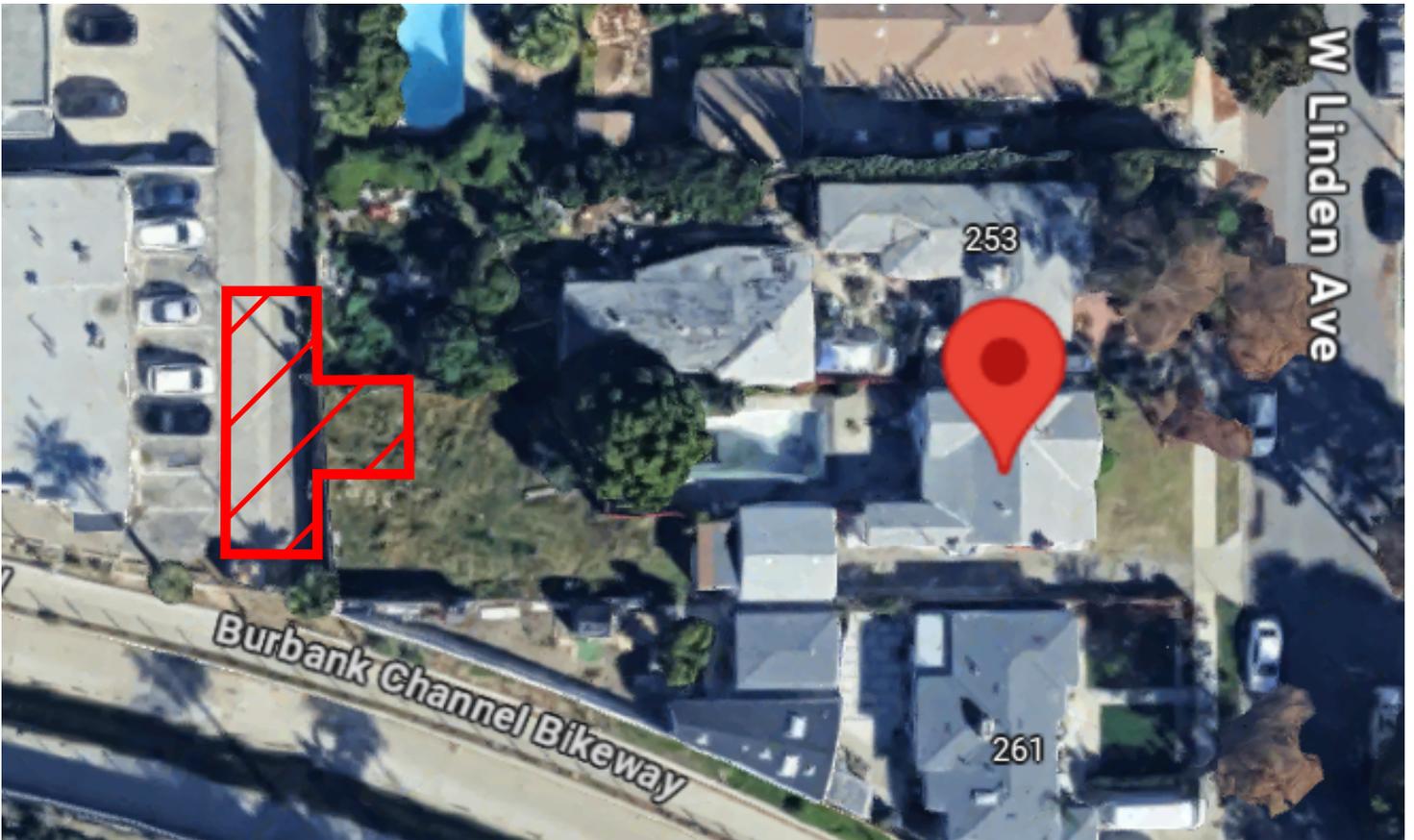
## **7) Submittals and Approvals**

- Plan Sheet. Provide a dedicated Fire Access & Water Supply Plan showing: EVA, hammerhead dimensions, hydrant/FDC, turning paths, striping/signage, vertical clearance notes, load capacity, and EVA easement.
  - Agency Coordination. Submit to Burbank Fire Department for approval and to Burbank Water and Power for hydrant service/flow sign-off.
  - Construction Notes. Incorporate fire access/water supply notes in the civil and life-safety plan sheets.
- 

## **References / Standards Cited**

- California Fire Code (as adopted by Burbank): 503.1–503.6; Appendix D (D103.1 width; D103.4 turnaround; D103.6 signage); 507.5.1/507.5.1.1 hydrants; 912.2.1 FDC; 104.11 alternative methods.
- NFPA 13 (sprinkler), NFPA 14 (standpipes/FDC).
- AASHTO/AutoTURN turning templates.
- City of Burbank Fire Department amendments (fire lane signage, hydrant spacing).





**257 W. LINDEN AVE.  
VICINITY MAP SHOWING PROPOSED  
FIRE APPARATUS HAMMER HEAD  
TURN AROUND**

# TECHNICAL MEMORANDUM

**To:**  
Sam Aslanian  
Sam Aslanian Architect, Inc.

**From:** Iteris, Inc.  
801 S. Grand Avenue, Suite 750  
Los Angeles, CA 90017

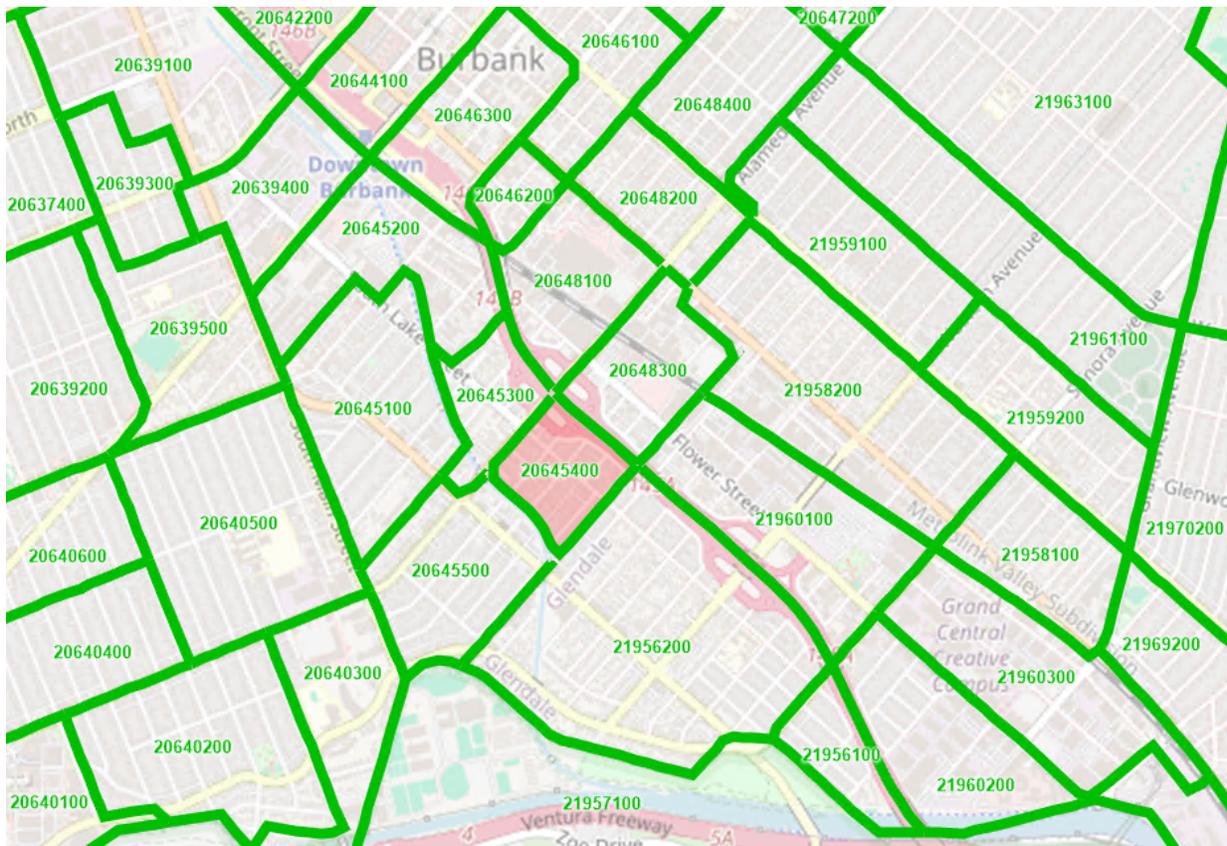
**Date:** September 17, 2025

**RE:** Travel Modeling Services for 257 West Linden Avenue, Burbank, California

This memorandum presents Iteris' Transportation Assessment of a proposed development project located at 257 West Linden Avenue in Burbank, CA. This analysis will utilize the SCAG 2024 RTP/SCS travel demand model, per the City of Burbank Traffic Analysis Guidelines.

## Background

**Figure 1** illustrates the location of the proposed project as part of the SCAG 2024 RTP/SCS travel demand model. Within the regional model, the project is within Transportation Analysis Zone (TAZ) 20645400.



**Figure 1: Proposed Project's TAZ Location**

## Methodology

Iteris utilized the 2019 and 2025-year travel demand model scenario from the current SCAG RTP/SCS travel demand model to prepare a CEQA-level Transportation Assessment of the project zone (without the proposed project). CEQA analysis is summarized as VMT, which is an area-wide performance measure which helps compare the overall performance of a project or project alternatives and is also used as a metric to ultimately assess the transportation environmental impacts of a project. SB743 VMT summary data was developed for the following geographies:

- Total project Traffic Analysis Zone (TAZ) automobile VMT (non-truck)
- Total City of Burbank automobile VMT (non-truck)
- Total County of Los Angeles automobile VMT (non-truck)
- SCAG Six County region LA automobile VMT (non-truck)

In addition to summarizing the raw model outputs, Iteris reviewed the SCAG VMT tool (HELPR 3.0) for reasonableness checking. The Housing, Environment, and Land Use Parcel Tool (HELPR) 3.0, developed by SCAG, is an interactive web-mapping platform that supports local jurisdictions and stakeholders in evaluating land use patterns, development potential, and environmental considerations in relation to regional objectives. Its data is sourced from *Connect SoCal 2024* (link), SCAG’s Regional Transportation Plan and Sustainable Communities Strategy. More information is available through the HELPR tool at <https://rdp.scag.ca.gov/helpr/>. The document can be also found at <https://rdp.scag.ca.gov/helpr/helpr-documentation.pdf>.

## SB743 VMT Analysis

The SCAG VMT tool was used to estimate VMT by trip purpose for six counties, the City of Burbank in Los Angeles County, and TAZ 20645400, which encompasses the project area. Total home-based VMT per capita was then calculated for each geography. This analysis was conducted for both 2019 and 2025 and the results are summarized in **Table 1**.

**Table 1. Total Home-based VMT per Capita Calculated Using the SCAG RTP/SCS Model**

Model Year	Metric	SCAG Region	LA County	Burbank	Project TAZ (TAZ 20645400)	TAZ VMT Comparison to Region
2019	Total Home-based VMT	390,849,238	176,849,430	1,435,387	15,410	<b>-37.8%</b>
	Total population	18,825,496	10,043,399	107,885	1,194	
	<i>Total home-based VMT per capita</i>	<u>20.76</u>	<u>17.61</u>	<u>13.30</u>	<u>12.91</u>	
2025	Total Home-based VMT	358,673,530	161,383,802	1,326,289	14,162	<b>-34.8%</b>
	Total population	19,075,895	10,047,932	107,583	1,155	
	<i>Total home-based VMT per capita</i>	<u>18.80</u>	<u>16.06</u>	<u>12.33</u>	<u>12.26</u>	

It should be noted that the home-based VMT includes all trip purposes including work, shopping, school, university, and recreation. As summarized in **Table 1**, total VMT per capita declined from 2019 to 2025, which is reasonable given the rise in remote work following COVID 19. Additionally, in both the 2019 and 2025

data, the project TAZ (TAZ 20645400) both indicate a low VMT area, with the zone greater than 30% reduction when compared with the regional average.

As mentioned earlier, the HELPR tool was also used as an additional resource to validate the model results. **Table 2** completes a summary of calculated SCAG model VMT analyses and HELPR tool VMT values.

**Table 2. Total Home-based VMT per Capita Calculated Using the SCAG HELPR Web-Based Tool**

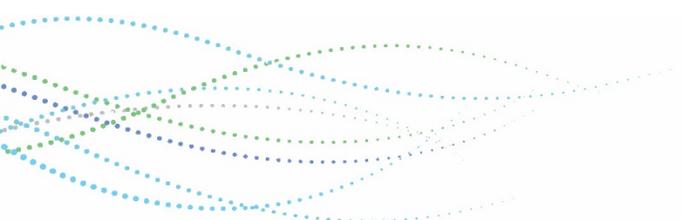
Model Year	Metric	SCAG Region	Project TAZ (TAZ 20645400)	TAZ VMT% of Region
2019	<i>Total home-based VMT per capita</i>	<u>21</u>	<u>18</u>	<u>-14.3%</u>

As summarized in **Table 2**, At the SCAG regional level, HELPR reports an average regional home-based VMT per capita of 21, which closely aligns with the model output of 20.76 in the 2019 data (it should also be noted that HELPR presents rounded values without decimals). However, at the project’s TAZ level, HELPR estimates VMT per capita at 18, compared to 12.91 as calculated directly from the SCAG model. While the HELPR estimate is near the low-VMT area threshold (-14.3%), it does fall within reasonable rounding error as the values in HELPR are heavily rounded to a single digit. For example:

- If the project VMT per capita was rounded up to 18 from 17.5, then using 17.5 compared to the region would show a reduction of 16.6%

### Conclusion

In conclusion, the SB743 VMT analysis, based on both the SCAG travel demand model and the HELPR tool, provide consistent evidence that the project area qualifies as a low-VMT area. At the regional level, HELPR results closely match the SCAG model outputs, further validating the model’s reliability. Although some differences were observed at the TAZ level, both sources place the project area within the low-VMT threshold, confirming that travel behavior in the project zone generates fewer home-based VMT per capita relative to regional averages. Taken together, these findings indicate that the project area is not anticipated to result in significant transportation-related environmental impacts under CEQA.



# TECHNICAL MEMORANDUM

**To:**  
Sam Aslanian  
Sam Aslanian Architect, Inc.

**From:** Iteris, Inc.  
801 S. Grand Avenue, Suite 750  
Los Angeles, CA 90017

**Date:** September 24, 2025

**RE:** Travel Modeling Services for 257 West Linden Avenue, Burbank, California

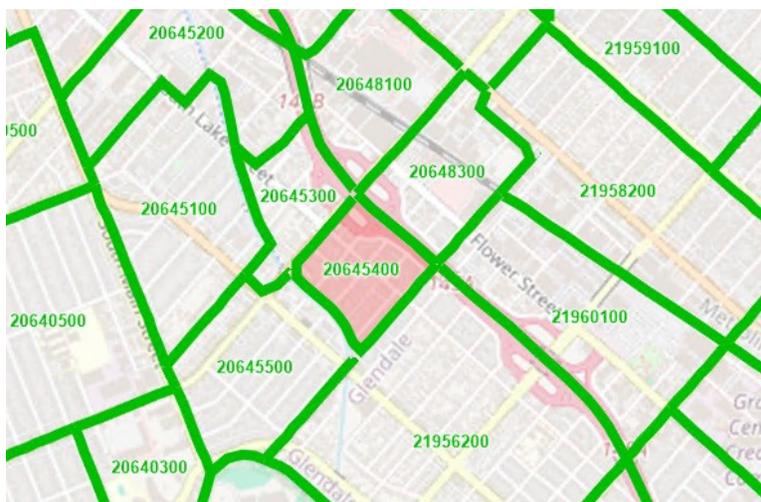
This memorandum presents Iteris' Transportation Assessment of a proposed development project located at 127 West Linden Avenue in Burbank, CA. This analysis will utilize the SCAG 2024 RTP/SCS travel demand model, per the City of Burbank Traffic Analysis Guidelines.

## Firm Qualifications

Iteris team members are experts in the fields of transportation planning, traffic engineering, and ITS. Knowledge of these practice areas enables Iteris to provide comprehensive services ranging from initial traffic impact studies, transportation modeling, planning, systems engineering, and detailed design, through implementation and performance measurement/monitoring. Iteris combines the knowledge of transportation planners, transportation engineers, systems engineers, system integrators, and software engineers to offer an unmatched combination of talent and experience. Within California Iteris has extensive travel demand model development and application experience applying, modifying, developing, and analyzing multiple travel demand models. Specific modeling has been completed utilizing all of the current Southern California region models (SCAG, OCTA, RivTAM, SBTAM, VCTM, ICTM). Iteris has used these models to support various projects, including VMT studies, general plan updates, long-range planning efforts, transportation strategic plans, environmental project support, traffic impact analysis, fee nexus and traffic impact fee studies, corridor studies, and local project developments.

## Background

**Figure 1** illustrates the location of the proposed project as part of the SCAG 2024 RTP/SCS travel demand model. Within the regional model, the project is within Transportation Analysis Zone (TAZ) 20645400.



**Figure 1: Proposed Project's TAZ Location**

## Methodology

Iteris utilized the 2019-year and 2025-year travel demand model scenario from the current SCAG RTP/SCS travel demand model to prepare a CEQA-level Transportation Assessment of the project zone (without the proposed project). SCAG is the Southern California Association of Governments and is the designated MPO for the region. The use of the SCAG RTP/SCS travel demand model is commonly used for CEQA VMT studies, and is the regional model designated in the City of Burbank Transportation Study Guidelines (dated 12/1/2020) for these activities.

CEQA analysis is summarized as VMT, which is an area-wide performance measure which helps compare the overall performance of a project or project alternatives and is also used as a metric to ultimately assess the transportation environmental impacts of a project. Following standard professional practice, TAZ-level automobile VMT was divided by resident population to develop per-capita VMT, which was then compared against the SCAG regional per-capita VMT average. SB743 VMT summary data was developed for the following geographies:

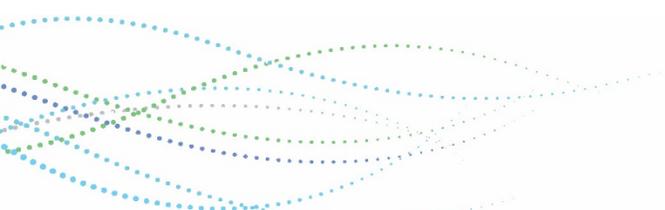
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In addition to summarizing the raw model outputs, Iteris reviewed the SCAG VMT tool (HELPR 3.0) for reasonableness checking. The Housing, Environment, and Land Use Parcel Tool (HELPR) 3.0, developed by SCAG, is an interactive web-mapping platform that supports local jurisdictions and stakeholders in evaluating land use patterns, development potential, and environmental considerations in relation to regional objectives. Its data is sourced from *Connect SoCal 2024* (link), SCAG's Regional Transportation Plan and Sustainable Communities Strategy. More information is available through the HELPR tool at <https://rdp.scag.ca.gov/helpr/>. The document can be also found at <https://rdp.scag.ca.gov/helpr/helpr-documentation.pdf>.

This methodology is consistent with statewide guidance and standard practice, including Office of Planning and Research (OPR)'s 2018 Technical Advisory on Evaluating Transportation Impacts in CEQA, Caltrans procedures, and peer jurisdictions such as the City of Los Angeles.

## SB743 VMT Analysis

The SCAG VMT tool was used to estimate VMT by trip purpose for six counties, the City of Burbank in Los Angeles County, and TAZ 20645400, which encompasses the project area. Total home-based VMT per capita was then calculated for each geography. This analysis was conducted for both 2019 and 2025 and the results are summarized in **Table 1**.



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*\*Note: Small decimal differences in modeled outputs are expected, as the model is a statistical tool. Therefore, comparing at the first or second decimal is likely too refined of an analysis for the regional model to estimate.*

It should be noted that the home-based VMT includes all trip purposes including work, shopping, school, university, and recreation. As summarized in **Table 1**, total VMT per capita declined from 2019 to 2025, which is reasonable given the rise in remote work following COVID 19. Additionally, in both the 2019 and 2025 data, the project TAZ (TAZ 20645400) both indicate a low VMT area, with the zone greater than 30% reduction when compared with the regional average.

As mentioned earlier, the HELPR tool was also used as an additional resource to validate the model results. **Table 2** completes a summary of calculated SCAG model VMT analyses and HELPR tool VMT values.

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2019	<u>Total home-based VMT per capita</u>	<u>21</u>	<u>18</u>	<u>-14.3%</u>

*\*Note: As mentioned as a footnote in Table 1, the regional model is most likely able to present VMT results at the integer level (not including decimals). This is evidenced by the HELPR tool values summarized in Table 2.*

As summarized in **Table 2**, At the SCAG regional level, HELPR reports an average regional home-based VMT per capita of 21, which closely aligns with the model output of 20.76 in the 2019 data (it should also be noted that HELPR presents rounded values without decimals). However, at the project’s TAZ level, HELPR estimates VMT per capita at 18, compared to 12.91 as calculated directly from the SCAG model. While the HELPR estimate is near the low-VMT area threshold (-14.3%), it does fall within reasonable rounding error as the values in HELPR are heavily rounded to a single digit.

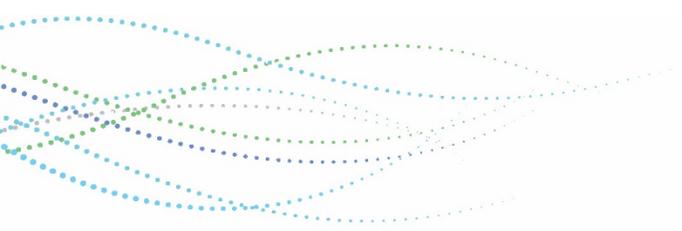
- As an example, if the project VMT per capita was rounded up to 18 from 17.5, then using 17.5 compared to the region would show a reduction of 16.6%

## Conclusion

In conclusion, the SB743 VMT analysis, based on both the SCAG travel demand model and the HELPR tool, provide consistent evidence that the project area qualifies as a low-VMT area under Gov. Code § 65915(p)(2). At the regional level, HELPR results closely match the SCAG model outputs, further validating the model’s

reliability. Although some differences were observed at the TAZ level, both sources place the project area within the low-VMT threshold, confirming that travel behavior in the project zone generates fewer home-based VMT per capita relative to regional averages. Importantly, the finding is not marginal – the project TAZ is approximately 35% below the SCAG regional per-capita VMT average, based on the most current model outputs.

Taken together, these findings indicate that the project area is not anticipated to result in significant transportation-related environmental impacts under CEQA.



## Executive Summary – Iteris Transportation Analysis

**Project:** 257 W. Linden Avenue, Burbank, CA

**Date:** September 24, 2025

**Prepared by:** Iteris, Inc. (SCAG/Caltrans/FHWA transportation consultants)

### What is VMT?

Vehicle Miles Traveled (VMT) measures how far people typically drive in an area. If a site is located in a Very Low VMT Area (15% or more below the regional average), state law (Gov. Code § 65915) grants:

- Unlimited density for 100% affordable housing projects;
- Zero required parking;
- Ministerial (by-right) approval.

### Iteris Findings

Using the SCAG 2024 RTP/SCS travel demand model (the method required by the City’s Traffic Analysis Guidelines), Iteris found the project site is well below the regional average:

Model Year Regional Avg. VMT Project TAZ VMT Reduction vs. Regional

2019	20.76	12.91	-37.8%
2025	18.80	12.26	-34.8%

HELPR 3.0 confirms the same trend; prior concerns about “rounding” are simply artifacts of HELPR’s integer display.

### Conclusion

The site is more than 30% below the regional average, well beyond the 15% threshold. It is clearly in a Very Low VMT Area, meaning the proposed 75-unit affordable housing project must be approved ministerially with zero required parking.

Reference: Full Iteris Technical Memorandum (Sept. 24, 2025):

[Iteris Revised Transportation Letter](#)

## *Sam Aslanian Architect*

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