Division of Land / Environmental Review

City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012

FINAL ENVIRONMENTAL IMPACT REPORT
Volume 3

NBC Universal Evolution Plan
ENV-2007-0254-EIR
STATE CLEARINGHOUSE NO. 2007071036
Council District 4

THIS DOCUMENT COMPRISES THE SECOND AND FINAL PART OF THE ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE PROJECT DESCRIBED. THE DRAFT EIR (VOLUMES 1 THROUGH 27) WHICH WAS PREVIOUSLY CIRCULATED FOR PUBLIC REVIEW AND COMMENT, COMPRISES THE FIRST PART.

Project Address: 100 Universal City Plaza, Universal City, CA 91608

Project Description: Universal City Studios LLLP, L.P., proposes the NBC Universal Evolution Plan (the "Project"), which sets forth the framework to guide the development of an approximately 391-acre site located in the east San Fernando Valley near the north end of the Cahuenga Pass (the "Project Site"). The Project, as proposed, would involve a net increase of approximately 2.01 million square feet of new commercial development, which includes 500 hotel guest rooms and related hotel facilities. In addition, a total of 2,937 dwelling units would be developed. Implementation of the proposed Project would occur pursuant to the development standards set forth in two proposed Specific Plans. The proposed Universal City Specific Plan addresses development within the portion of the Project Site located within the City of Los Angeles, whereas the proposed Universal Studios Specific Plan addresses development within the portion of the Project Site located under the jurisdiction of the County of Los Angeles. Under the proposed Project, portions of the Project Site that are currently in the County of Los Angeles would be annexed into the City of Los Angeles, while other areas would be detached from the City of Los Angeles and returned to the jurisdiction of the County of Los Angeles. The proposed annexation/detachment reflects the Applicant's objective to establish jurisdictional boundaries that follow existing and planned on-site land use patterns.

APPLICANT:
Universal City Studios LLLP, L.P.

PREPARED BY:
Environmental Review Section
Los Angeles City Planning Department

July 2012

III. Responses to Comments
(Continued)

Comment No. 12-375

See next page

[close]

SEARCH BY:

- Address
- Street Intersection
- Assessor Parcel No.
- PIN Number
- Legal Description
- MapSheet
- Case Number
- Community Plan Area
- Council District
- Certified Neighborhood Council

SEARCH BY INTERSECTION:

[redacted]

Enter First Street Name: [redacted]
Note: Do not use prefixes or suffixes
Example: For N Spring St enter 'spring'

[redacted]me:
Example: 'temple'

Click "GO" to start the search: GO

Table 17
Analyzed Intersections

No.	Intersection	Jurisdiction
1	Colfax Avenue & Ventura Boulevard	City of Los Angeles
2	Kraft Avenue/SR 170 SB Off-Ramp & Riverside Drive	City of Los Angeles/Caltrans
3	Tujunga Avenue & Riverside Drive/Camarillo Street	City of Los Angeles
4	Tujunga Avenue & Ventura Boulevard	City of Los Angeles
5	Eureka Drive & Ventura Boulevard	City of Los Angeles
6	Lankershim Boulevard & Magnolia Boulevard	City of Los Angeles
7	[redacted]	City of Los Angeles
8	Vineland Avenue & Magnolia Boulevard	City of Los Angeles
9	Vineland Avenue/Lankershim Boulevard & Camarillo Street	City of Los Angeles
10	Vineland Avenue & Riverside Drive	City of Los Angeles
11	Vineland Avenue & Moorpark Street	City of Los Angeles
12	Vineland Avenue & Whipple Street	City of Los Angeles
13	Vineland Avenue & US 101 NB Off-Ramp	City of Los Angeles/Caltrans
14	Vineland Avenue & Ventura Boulevard	City of Los Angeles
15 [a]	SR 134 EB On-Ramp e/o Vineland Avenue & Riverside Drive	City of Los Angeles/Caltrans
16	Plaza Parkway & Ventura Boulevard	City of Los Angeles
17	Riverton Avenue/Campo de Cahuenga Way & Ventura Boulevard	City of Los Angeles
18	Lankershim Boulevard & SR 134 WB Off-Ramp	City of Los Angeles/Caltrans
19	Lankershim Boulevard & Riverside Drive	City of Los Angeles
20	Lankershim Boulevard & Moorpark Street	City of Los Angeles
21	Lankershim Boulevard & Whipple Street	City of Los Angeles
22	US 101 NB Ramps & Campo de Cahuenga Way	City of Los Angeles/Caltrans
23	Metro Driveway & Campo de Cahuenga Way	City of Los Angeles
24	Cahuenga Boulevard & Magnolia Boulevard	City of Los Angeles
25	Cahuenga Boulevard & Huston Street	City of Los Angeles
26	Cahuenga Boulevard & Camarillo Street	City of Los Angeles
27	Cahuenga Boulevard & SR 134 WB Off-Ramp	City of Los Angeles/Caltrans
28	Cahuenga Boulevard & SR 134 EB Ramps	City of Los Angeles/Caltrans
29	Cahuenga Boulevard & Riverside Drive	City of Los Angeles
30	Cahuenga Boulevard & Moorpark Street	City of Los Angeles
31	Cahuenga Boulevard & Whipple Street	City of Los Angeles
32 [b]	Cahuenga Boulevard & Valley Spring Lane	City of Los Angeles
33	Lankershim Boulevard & Cahuenga Boulevard	City of Los Angeles
34	Lankershim Boulevard & Valleyheart Drive/James Stewart Avenue	City of Los Angeles/County of Los Angeles
35	Lankershim Boulevard & Main Street	City of Los Angeles/County of Los Angeles
36	Lankershim Boulevard & Campo de Cahuenga Way/ Universal Hollywood Drive	City of Los Angeles/County of Los Angeles
37	Lankershim Boulevard & US 101 NB Off-Ramp	City of Los Angeles/Caltrans
38 [c]	Lankershim Boulevard & Ventura Boulevard/Cahuenga Boulevard	City of Los Angeles

Response to Comment No. 12-375

Appendix AA consists of a page from ZIMAS and a copy of page 733 from the Draft EIR and is referenced in Response to Comment No. 12-36. As such, the commenter is referred to Response to Comment No. 12-36, above.

Comment No. 12-376

See next page

APPENDIX BB

As shown on Table 30 on page 780, the Project is expected to generate a net total of 36,451 daily trips on a typical weekday, including approximately 3,069 morning peak hour trips and 3,623 afternoon peak hour trips before considering Transportation Demand Management program/transit credits. Accounting for a site-wide Transportation Demand Management program/transit credit of approximately 13.9 in the morning peak hour and 11.4 percent in daily trips and the afternoon peak hour, the Project Site is expected to generate a net increase of 28,108 daily trips on a typical weekday, including approximately 2,328 morning peak hour trips and 2,770 afternoon peak hour trips as shown in Table 36 on page [illegible]. The Transportation Demand Management program thus results in a decrease of 8,343 daily trips, including approximately 741 morning peak hour trips and 853 afternoon peak hour trips.

(2) Project-Related Roadway Improvements

(a) North-South Road

As part of the Project, a new roadway, "North-South Road", would be constructed. North-South Road would be connected between Lakeside Plaza Drive on the north and Buddy Holly Drive (the US 101 frontage road) on the south, thereby providing a north-south Modified Secondary Highway connection through the Project Site. The North-South Road would provide four travel lanes along its length during peak hours.

New signalized intersections would be added along North-South Road at Lakeside Plaza Drive, Buddy Holly Drive, and at approximately three to four additional intersections along the length of the roadway to provide access to the residential neighborhoods in the Mixed-Use Residential Area. A new system of modified hillside collector streets, local streets, and private driveways would be constructed in the Mixed-Use Residential Area to provide an integrated system of access and circulation streets.

The existing 'East-West' roadway reflected in the County's Master Plan of Highways would be removed from the Master Plan.

(b) Buddy Holly Drive

The Project proposes to improve Buddy Holly Drive between Universal Studios Boulevard/Universal Center Drive and Barham Boulevard to provide additional lanes of travel along the roadway. The roadway improvements can be divided into three distinct roadway segments: (1) Buddy Holly Drive between Barham Boulevard and the US 101 northbound off-ramp, (2) Buddy Holly Drive between the US 101 northbound off-ramp to the North-South Road, and (3) Buddy Holly Drive between the North-South Road and Universal Studios Boulevard/Universal Center Drive. The proposed intersection of North-South Road & Buddy Holly Drive and the proposed improvements to Buddy Holly Drive described below. Please refer to Figures 80A and 80B on pages 914 and 915.

Project Design Feature B-8: The Applicant or its successor shall pay for up to five changeable message signs (CMS) as part of the Hollywood Event Management infrastructure.

c. Mitigation Measures

(1) Sharing of Mitigation Measures

Certain of the Project's regional and sub-regional highway improvements, specific intersection improvements, signal controller upgrades and transit improvements, may be shared with the neighboring proposed Metro Universal project (Metro Universal – Related Project #65).

Construction of the proposed Metro Universal project if approved by the City of Los Angeles may begin prior to commencement of construction of the Project. In accordance with standard City of Los Angeles policy, the proposed Metro Universal project would be required to suitably guarantee the shared intersection improvements prior to building permit issuance as well as implement these improvements before issuance of a certificate of occupancy. Some of these improvements would improve the intersection operating condition beyond what is required to mitigate impacts from the proposed Metro Universal project alone. At such locations, subject to an agreement to share in the cost of the improvement, the extra capacity credit would be available for the Project as mitigation. The Los Angeles Department of Transportation has agreed that the Applicant or its successor may enter into an agreement with the developer of the proposed Metro Universal project to share the extra capacity (excess mitigation credits). This excess credit would be available to the Project in exchange for providing reimbursement for a portion of the costs of the improvements to the proposed Metro Universal project. In the event that the proposed Metro Universal project is not approved or is delayed, the Project would pay the full implementation costs of these traffic improvements and be reimbursed by the proposed Metro Universal project if and when that project is built. Any remaining excess capacity or over-mitigation not utilized by the Project and the proposed Metro Universal project could be made available to other projects subject to share in on the cost of the improvements.

Conversely, if the Project is delayed and construction of the proposed Metro Universal project commences first, the proposed Metro Universal project would be required to implement the mitigation measures. The extra capacity credit would be made available to the Project on the basis of a fair-share financial participation in the improvement that would be implemented under a reimbursement agreement between the two parties.

Response to Comment No. 12-376

Appendix BB consists of a copy of pages 619 and 665 from the Draft EIR and is referenced in Comment No. 12-37. As such, the commenter is referred to Response to Comment No. 12-37, above.

Comment No. 12-377

See next page

APPENDIX CC

I. Introduction/Summary

A. Introduction

The Applicant, Universal City Studios LLLP, L.P., proposes the NBC Universal Evolution Plan (hereafter referred to as the "Project") which sets forth the framework to guide the development of an approximately 391-acre site located in the east San Fernando Valley near the north end of the Cahuenga Pass. The Project Site is generally bounded by the Los Angeles River Flood Control Channel - Los Angeles County Flood Control District (hereafter referred to as the Los Angeles River Flood Control Channel) to the north, Barham Boulevard to the east (except in the area of the Hollywood Manor residential area), the Hollywood Freeway to the south (except for the southwest corner of the Project Site which abuts existing off-site hotel and office towers), and Lankershim Boulevard to the west. The Project Site is located approximately two miles north of Hollywood and 10 miles northwest of downtown Los Angeles, in central Los Angeles County. The Project Site is located approximately 1.5 miles south and east of the junction of U.S. Route 101 (Hollywood Freeway) and State Route 134 (Ventura Freeway). The Hollywood area within the City of Los Angeles is located south of the Project Site, starting at the south end of the Cahuenga Pass. The City of Burbank is located generally to the northeast of the Project Site. The Project Site is shown in a regional and local context in Figures 1 and 2 on pages 2 and 3, respectively.

Future development across the Project Site would occur pursuant to two proposed Specific Plans, the proposed Universal City Specific Plan, which would guide future development within the portions of the Project Site located within the City of Los Angeles, and the proposed Universal Studios Specific Plan, which would guide future development within the portion of the Project Site located within unincorporated Los Angeles County. This Draft Environmental Impact Report (Draft EIR) analyzes the potential environmental effects of development pursuant to these two proposed Specific Plans, as well as the Applicant's requested General Plan Amendments, and all other related actions.

Under existing conditions, approximately 95 acres (24 percent) of the Project Site are located within the City of Los Angeles (the "City") and the remaining 296 acres (76 percent) are located within the unincorporated area of Los Angeles County (the "County"). The proposed Specific Plans reflect the proposed annexation and detachment of portions of the Project Site from the County's jurisdiction into the City, and from the City's

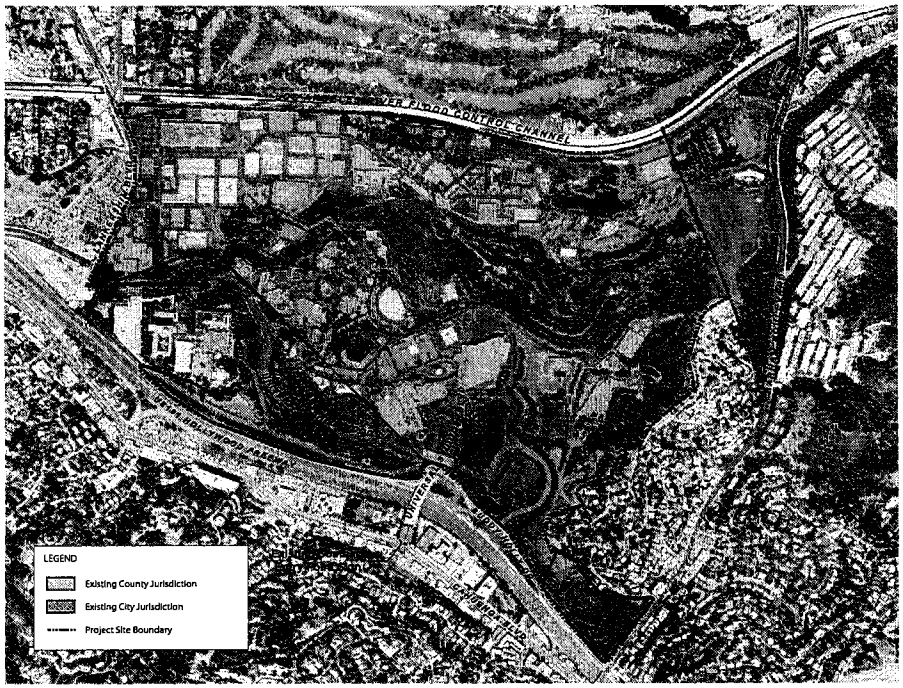
jurisdiction into the County. The proposed Project involves the annexation of approximately 76 acres (19 percent) of the Project Site from the County's jurisdiction into the City, and the detachment of approximately 32 acres (8 percent) of the Project Site from the City's jurisdiction into the County, for an overall net change of approximately 44 acres (11 percent) from the County to the City. Figure 3 on page 5 identifies those portions of the Project Site under City and County jurisdiction under existing conditions as well as under the proposed annexation and detachment actions.

The Project, as proposed, would include the development of approximately 1.83 million square feet of net new entertainment, studio, office, and related uses, which includes up to 500 hotel guest rooms and related hotel facilities. In addition, 2,937 residential dwelling units and 115,000 square feet of retail/commercial uses and up to 65,000 square feet of community serving uses would be constructed. Approximately 638,000 square feet of existing studio, office, and entertainment uses would be demolished as part of the Project, although the majority of existing on-site uses and facilities would remain.

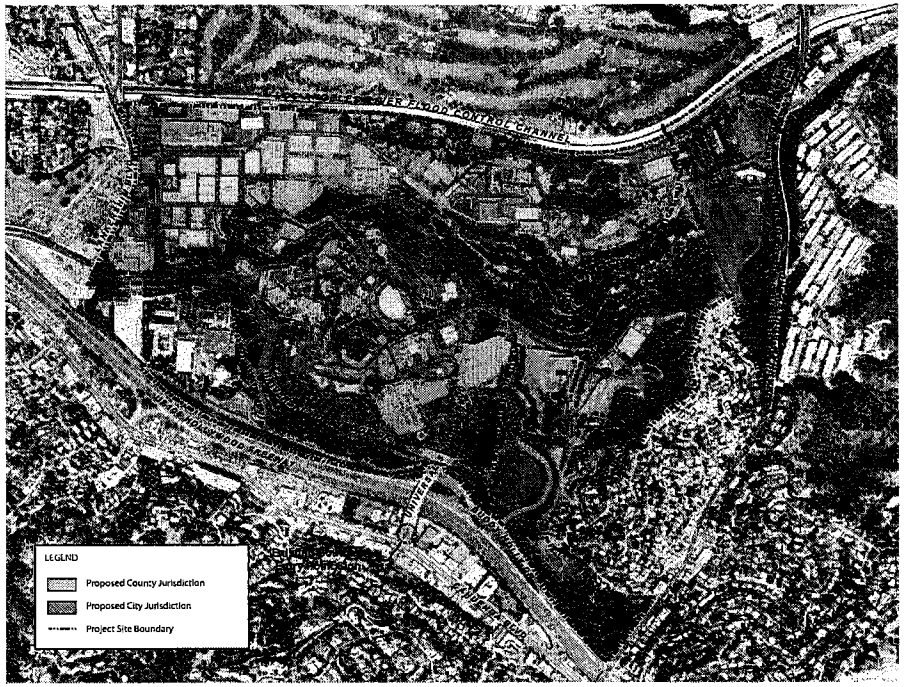
The proposed City and County Specific Plans provide a framework for the continued use and development of the Project Site. Specifically, the proposed Universal City Specific Plan would regulate the development of various studio production and commercial uses, as well as new residential dwelling units within the jurisdictional boundaries of the City. The proposed Universal Studios Specific Plan would regulate the enhancement of existing studio production facilities, entertainment facilities (Universal Studios Hollywood and Universal CityWalk) and new entertainment venues, hotel and office uses.

Adoption of the aforementioned proposed Specific Plans, along with other actions described in the Project Description of this Draft EIR (see Section II), requires approval by the City of Los Angeles and the County of Los Angeles. These requests for approval are actions requiring environmental review under the California Environmental Quality Act (CEQA). The City of Los Angeles Department of City Planning is acting as Lead Agency for the Draft EIR and for purposes of complying with CEQA. As Lead Agency, the City is responsible for the preparation and distribution of this Draft EIR. The County of Los Angeles serves as a responsible agency.

The City and the County entered into a Memorandum of Understanding concerning cooperative efforts to process the Project's environmental documents and entitlements. The Memorandum of Understanding states that the City is expected to act first on Project entitlements and thus the City shall be designated the Lead Agency pursuant to CEQA for the environmental review of the Project and the County shall be designated as a Responsible Agency. The Memorandum of Understanding further states that the City and the County shall work jointly and cooperate in the preparation of the EIR for the Project and



Existing Jurisdictional Boundaries



Proposed Jurisdictional Boundaries

NORTH

Source: Rios Clementi Hale Studios, 2010.

matrix environmental

Figure 3
Aerial of Existing and Proposed Jurisdictional Boundaries

Response to Comment No. 12-377

Appendix CC consists of a copy of pages 1 and 4 from the Introduction/Summary section of the Draft EIR, as well as Figure 3, page 5, from the Draft EIR, which are referenced in Comment No. 12-38. As such, the commenter is referred to Response to Comment No. 12-38, above.

Comment No. 12-378

See next page

meyers | nave
professional law corporation

Resources | PUBLICATIONS

Title: MN Legal Alert: Court Invalidates EIR's Use of Post-Approval "Future" Baseline For Analysis of Project Impacts
Author(s): Amrit Kulkarni and Peter Hayes
Date: 2010-12-23

Summary:

Court Invalidates EIR's Use of Post-Approval "Future" Baseline For Analysis of Project Impacts

The California Environmental Quality Act, or CEQA, requires agencies to analyze the potentially significant impacts of proposed projects and adopt feasible methods to reduce or avoid significant impacts identified. The California Court of Appeal, Sixth District, has ruled that an Environmental Impact Report ("EIR") may not compare impacts to a baseline consisting of projected future conditions when the project is expected to be complete. The ruling, in *Sunnyvale West Neighborhood Assn. v. City of Sunnyvale City Council*, is important, since comparison to a "future" baseline had become a widespread "industry practice," particularly for analysis of traffic and circulation impacts.

The City of Sunnyvale prepared an EIR for the proposed Mary Avenue Extension, consisting of a new bridge to be constructed over two freeways and light rail tracks. [illegible] analysis of forecasted traffic conditions -- without the project -- in the year 2020, the year in which the City expected the project to be complete and in use. The EIR's baseline included future traffic levels based on build-out under the City general plan, along with numerous roadway improvements planned to be in place by 2020. In response to comments criticizing the traffic analysis, city staff reported that it had been prepared consistent with impact-analysis guidelines of the Santa Clara Valley Transportation Authority, as part of that Authority's responsibilities under the state's Congestion Management Law.

In court, the petitioners attacked use of a future baseline. The petitioners cited CEQA Guidelines section [illegible], which requires an EIR to describe physical environmental conditions in the vicinity of a project "as they exist at the time the notice of preparation [of the EIR] is published or . . . , at the time environmental analysis is commenced, . . ." and which further provides that "[t]his environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant."

In defense of its future baseline, the City relied on *Save Our Peninsula Committee v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99, which the City argued gave it discretion to use a future baseline. In *Save Our Peninsula*, the court had stated that ". . . where the issue involves an impact on traffic levels, the EIR might necessarily take into account the normal increase in traffic over time. Since the environmental review process can take a number of years, traffic levels as of the time the project is approved may be a more accurate representation of the existing baseline against which to measure the impact of the project." (Id. at 125 – 126.) Some agencies and legal practitioners had interpreted *Save Our Peninsula* to allow an agency with knowledge that environmental conditions would either improve or degrade by the time a project is constructed to select a future baseline, so long as the agency was careful to summarize the evidence supporting its selection of the future baseline.

Sunnyvale West Neighborhood Assn significantly narrows that interpretation. The decision acknowledges that the California Supreme Court, in *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, endorsed *Save Our Peninsula*'s holding. But *Sunnyvale West Neighborhood Assn* further notes that the Supreme Court "never sanctioned the use of predicted conditions on a date subsequent to EIR certification or project approval as the 'baseline' for assessing a project's environmental consequences." The *Sunnyvale West Neighborhood Assn* invalidated the EIR's use of a future baseline consisting of projected conditions in 2020 -- more than a decade after proposed project approval.

Sunnyvale West Neighborhood further holds that use of a post-approval future baseline is a "failure to proceed in a manner required by law," and that agencies lack discretion to select such a baseline, regardless of whether they determine that a post-approval future baseline is supported by "substantial evidence." The decision alternatively holds that, even if the City had possessed discretion to select a post-approval future baseline, the Santa Clara Valley Transportation Authority guidelines for traffic impact analysis under the Congestion Management Act would not provide an adequate basis for selecting a post-approval future baseline under CEQA. Finally, the court rejected an argument that the EIR's use of a future baseline consisting of traffic conditions expected to be much worse than presently exist resulted in a "more conservative and realistic" impact assessment and was, therefore, not reversible "prejudicial" error. The court, after acknowledging that this argument had "some surface appeal," held that use of a post-approval future baseline improperly "obscures the existence and severity of adverse impacts that would be attributable solely to the project under the existing conditions without the other assumed roadway improvements."

Sunnyvale West Neighborhood does not rule out discussion of foreseeable changes and future conditions in an EIR, and notes that such discussion may be necessary to compliance with CEQA – for example, in discussion of cumulative impacts or the "no project" alternative. Nevertheless, the decision emphasizes the primacy of comparison to an "existing conditions" baseline. [illegible] proposed and becomes the subject of an EIR under CEQA. [illegible] focus on the existing environment is the foundational information of an EIR even where secondary analyses are included.

Meyers Nave's Land Use Group provides advice on local land use, subdivision, zoning, environmental impact reviews and CEQA issues. For more information about the Group, or the legal issues discussed in this alert, contact Amrit Kulkarni or Peter Hayes at 800.464.3559.

click here for full text

Related Attorneys:
Kulkarni, Amrit
Hayes, Peter

Related Areas of Law:
Land Use & Environmental Law
Environmental Law

©2003-2009, Meyers Nave Riback Silver & Wilson. All rights reserved.

Response to Comment No. 12-378

Appendix DD consists of a page from the website of Meyers Nave regarding a California Court of Appeal decision and is referenced in Comment No. 12-39. As such, the commenter is referred to Response to Comment No. 12-39, above.

Comment No. 12-379

See next page

APPENDIX EE

From: jbech@earthlink.net
Subject: LEED controversy
Date: Wed, October 20, 2010 10:25 am
To: "Lisa Sarkin" <lsarkin@scnc.info>
Cc: "Jon Brouse" <jon@jonbrouseaia.com>

---

lisa

thought you might be interested:
Suit charges USGBC with fraud, false advertising, [redacted]
Henry Gifford, a Manhattan building energy consultant and outspoken critic of LEED, has filed a lit against the USGBC seeking class action status and alleging fraud, false advertising, antitrust, and RICO violations. Gifford claims the [redacted] claiming its LEED rating system [redacted] and that the LEED Accredited Professional credential is worthless. The USGBC says it does not comment on pending lawsuits.
Read More: http://www.sgc-ecms.com/ecms/redirect.cfm?LID=351329&SID=2923427

[this is what some of us have been saying in the architectural field for some time now, as to wether or not public policy / requirements should be based on LEED specifically. i have been a proponent of good architecture [sustainable building practices] for over 20 years, but believe that all LEED currently does is add an extra charge / bureaucracy to my clients without the guarantee that the building will be more energy efficient or better for the environment through the use of LEED qualified materials.]

best regards
[redacted]

Attachments:

untitled-[1]	
Size:	1.2 k
Type:	text/plain

APPENDIX EE

Table 192 (Continued)
Comparison of the Project to the Applicable Housing Goals and Policies of the City of Los Angeles General Plan Framework and 1998-2005 Housing Element

General Plan Policies	Analysis of Project Consistency
Goal 8: Housing, jobs, and services in mutual proximity.	**Compatible:** The Project includes a mix of neighborhood -serving retail uses, residential and community facilities in proximity to one another.
[redacted] Energy efficient housing.	[redacted] The Project would be designed and constructed to comply [redacted] applicable energy conservation standards [redacted] in addition [redacted] Mixed-Use Residential Area [redacted] been accepted [redacted] the LEED-ND (Neighborhood Development) pilot [redacted] would seek LEED-ND [redacted]
A distribution of housing opportunities by type and cost for all residents of the City.	**Compatible:** The Project's 2,937 new multi-family units would contribute to meeting the City's overall housing needs for both ownership and rental housing. Based on current planning forecasts, the Project would provide approximately 60 percent ownership units (approximately 1,760 condominiums and townhomes) and 40 percent renter-occupied units (approximately 1,175 rentals). As noted above, although the Project's specific unit pricing has not been established at this time, the Applicant is considering providing a range of housing opportunities including work force housing (i.e., rentals at 200 percent of area median income). This may not, however, accommodate households in the lowest income categories.
General Plan Housing Element (1998-2005) Objectives	
Encourage production and preservation of an adequate supply of rental and ownership housing to meet the identified needs of persons of all income levels and special needs.	**Compatible:** The Project's 2,937 new multi-family units would contribute to meeting the City's overall housing needs for both ownership and rental housing. Based on current planning forecasts, the Project would provide approximately 60 percent ownership units (approximately 1,760 condominiums and townhomes) and 40 percent renter-occupied units (approximately 1,175 rentals). As noted above, although the Project's specific unit pricing has not been established at this time, the Applicant is considering providing a range of housing opportunities including work force housing (i.e., rentals at 200 percent of area median income). This may not, however, accommodate households in the lowest income categories.
Encourage the provision of housing with support services for persons with special needs (e.g., homeless, mental or physical disability, elderly, large families, and persons living with HIV/AIDS).	**Compatible:** While the Project is not specifically planned to accommodate special needs housing, it should be noted that such households would not be prevented from occupying housing units.
Promote housing strategies which enhance neighborhood safety and sustainability, and provide for adequate population, development, and infrastructure and service capabilities within the City and each community plan area, or other pertinent	**Compatible:** The Project involves preparation and approval of a proposed Specific Plan and this EIR through which the Project's land uses, infrastructure, and services would all be specified and coordinated. The design of the Mixed-Use Residential Area includes a range of unit types and neighborhood-serving retail uses, and community facilities, which would be designed with attention to

Response to Comment No. 12-379

Appendix EE consists of an email from jbech@earthlink.net to Lisa Sarkin and a copy of page 2073 from the Draft EIR is referenced in Comment No. 12-41. As such, the commenter is referred to Response to Comment No. 12-41, above.

Comment No. 12-380

See next page

APPENDIX FF

Shadows cast by the same building during the summer solstice are shorter than during the winter solstice, and oriented at a greater number of degrees from true north, due to the higher angle of the sun during the summer season.

This section of the Draft Environmental Impact Report (EIR) assesses the shading impacts of the Project Site under both existing conditions and proposed Project development. The analysis addresses existing shading conditions on surrounding uses as a result of existing on-site buildings and certain prominent off-site buildings that cast shadows in areas where Project shadows are also likely to occur. The analytical approach is conservative in that it evaluates the shade impact of the Height Zones and Height Exception areas as if they were fully built out with maximum development at the respective height zones rather than evaluating individual building envelopes as shown in the conceptual plan. The maximum development evaluated uses the maximum development footprint for conservative illustrative purposes only, as buildings may be located anywhere within the respective Height Zone, as permitted. As described further in the Methodology discussion of this Draft EIR section, the total permitted development on the Project Site would be substantially less than the full build-out of the Height Zones. Th[redacted] im[redacted] shown by [redacted].

Shadow patterns have been calculated and diagrammed for the following periods:

Season	Date	Time of Day
[redacted]	December 22	9:00 A.M. to 3:00 P.M.
[redacted]	March 22	[redacted]
[redacted]	June 22	[redacted]
[redacted]	September 22	[redacted]

These periods were selected per the City of Los Angeles CEQA Thresholds Guide (2006) and represent the portion of the day during which shading would be expected to be of concern to most people. Collectively, the seasonal shadow patterns define an annual shadow pattern that can be attributed to existing buildings and development permitted under the development Height Zones and Height Exception areas set forth by the proposed City and County Specific Plans. Although the daily periods for each season vary, each bears an approximately equal relationship to the total period of sunlight for the respective day.

S[redacted] analysis have been diagrammed for morning (9:00 A.M.), midday (1[redacted] and spring or 4:00 P.M. in summer and fall).

[redacted] account in all shadow projections.

Routinely usable outdoor spaces associated with residential, recreational (parks and historical sites), institutional (schools, convalescent hospitals, etc.), and certain commercial uses (pedestrian-oriented outdoor spaces, restaurants with outdoor eating spaces, nurseries, etc.), and existing solar collectors are considered shadow-sensitive. Although the Lakeside Golf Club is a recreational use, users of this facility are highly mobile and generally do not stay in the same location for more than a limited amount of time. Hence, the Lakeside Golf Club is not defined as shadow-sensitive. Nevertheless, potential shadow impacts on this facility are identified in this analysis for informational purposes. The off-site locations included in this analysis are shown in Figure 126 on page 1184.

2. Environmental Setting

a. Existing Local Off-Site Conditions

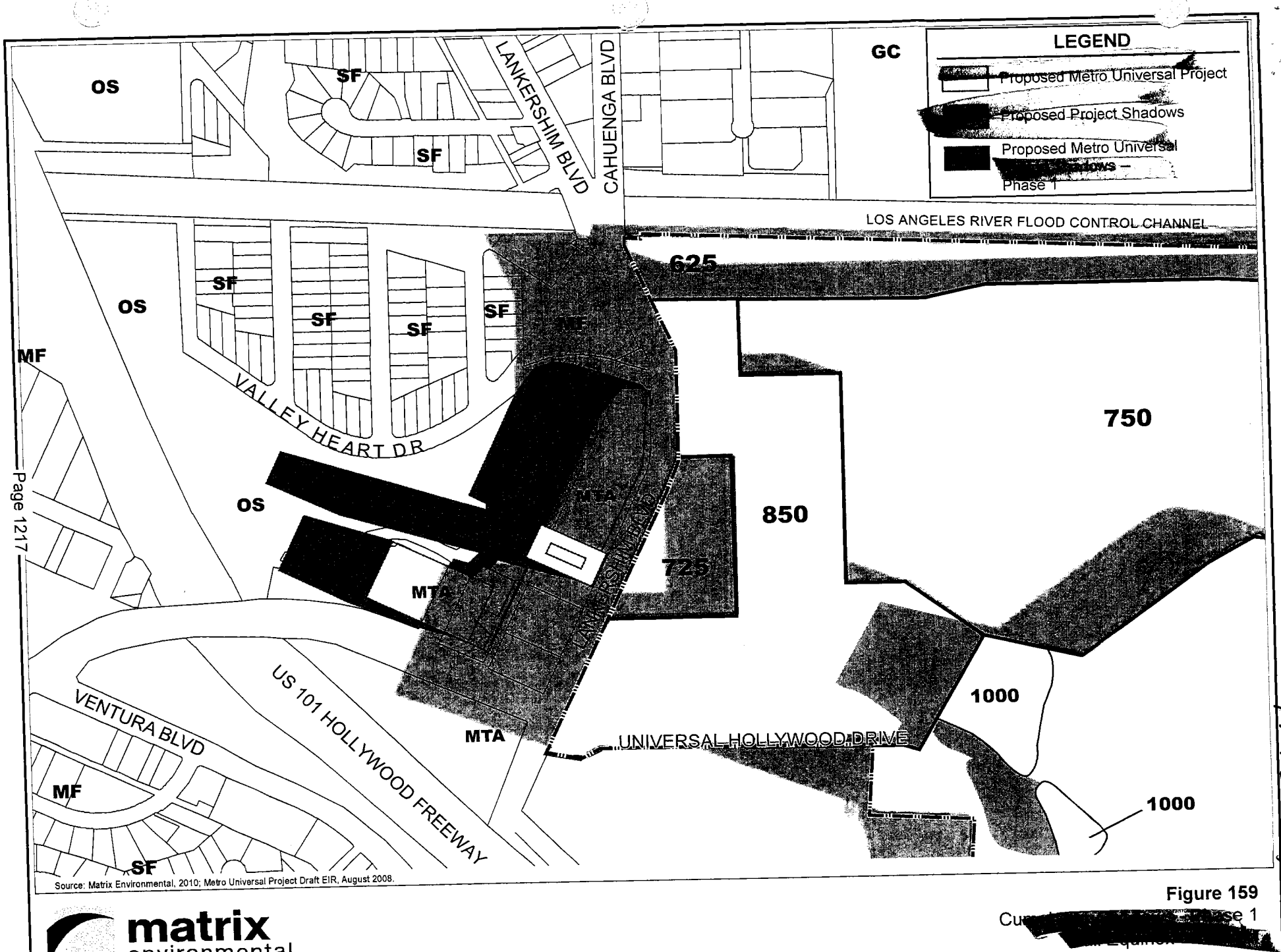
The Project Site is surrounded or partially surrounded on all sides by sizable public roadways and drainage facilities that separate the Project Site from adjacent uses. Along the northern boundary of the Project Site, the Los Angeles River Flood Control Channel separates the Project Site from the Toluca Estates area and the Lakeside Golf Club. Along the southern border of the Project Site, the Hollywood Freeway separates the majority of the site from the commercial and residential development to the south; however, hotel and office land uses are located adjacent to the Project Site's southwestern corner (south of Universal Hollywood Drive and north of the Hollywood Freeway). Lankershim Boulevard separates the Project Site from the Universal City Metro Red Line Station, the Campo de Cahuenga, Weddington Park (South), City View Lofts apartments, and the Island residential area to the west. Barham Boulevard separates the Project Site from the Oakwood Garden Apartments and the Hollywood Knolls area to the east. A portion of the Project Site's eastern border, however, is directly adjacent to the Hollywood Manor area. Off-site shadow-sensitive uses within the vicinity of the Project Site include: (1) the Toluca Lake and Toluca Estates residential area, multi-family residences in the City of Burbank, and the outdoor patio at the Ca' del Sole Restaurant to the north across the Los Angeles River Flood Control Channel; (2) the Hollywood Manor residential area, Oakwood Garden Apartments, and Hollywood Knolls residential area to the east, along Blair Drive and across Barham Boulevard, respectively; (3) the Campo de Cahuenga historic site, Weddington Park (South), the Island residential area, and the City View Lofts to the west, across Lankershim Boulevard; and (4) the outdoor pool, poolside bar, and seating/dining areas of the Sheraton Universal Hotel and the Universal City Hilton Hotel adjacent to the southwest corner of the Project Site across Universal Hollywood Drive.

Response to Comment No. 12-380

Appendix FF consists of a copy of pages 1157-1158 from the Draft EIR and is referenced in Comment No. 12-43. As such, the commenter is referred to Response to Comment No. 12-43, above.

Comment No. 12-381

See next page



Source: Matrix Environmental, 2010; Metro Universal Project Draft EIR, August 2008.

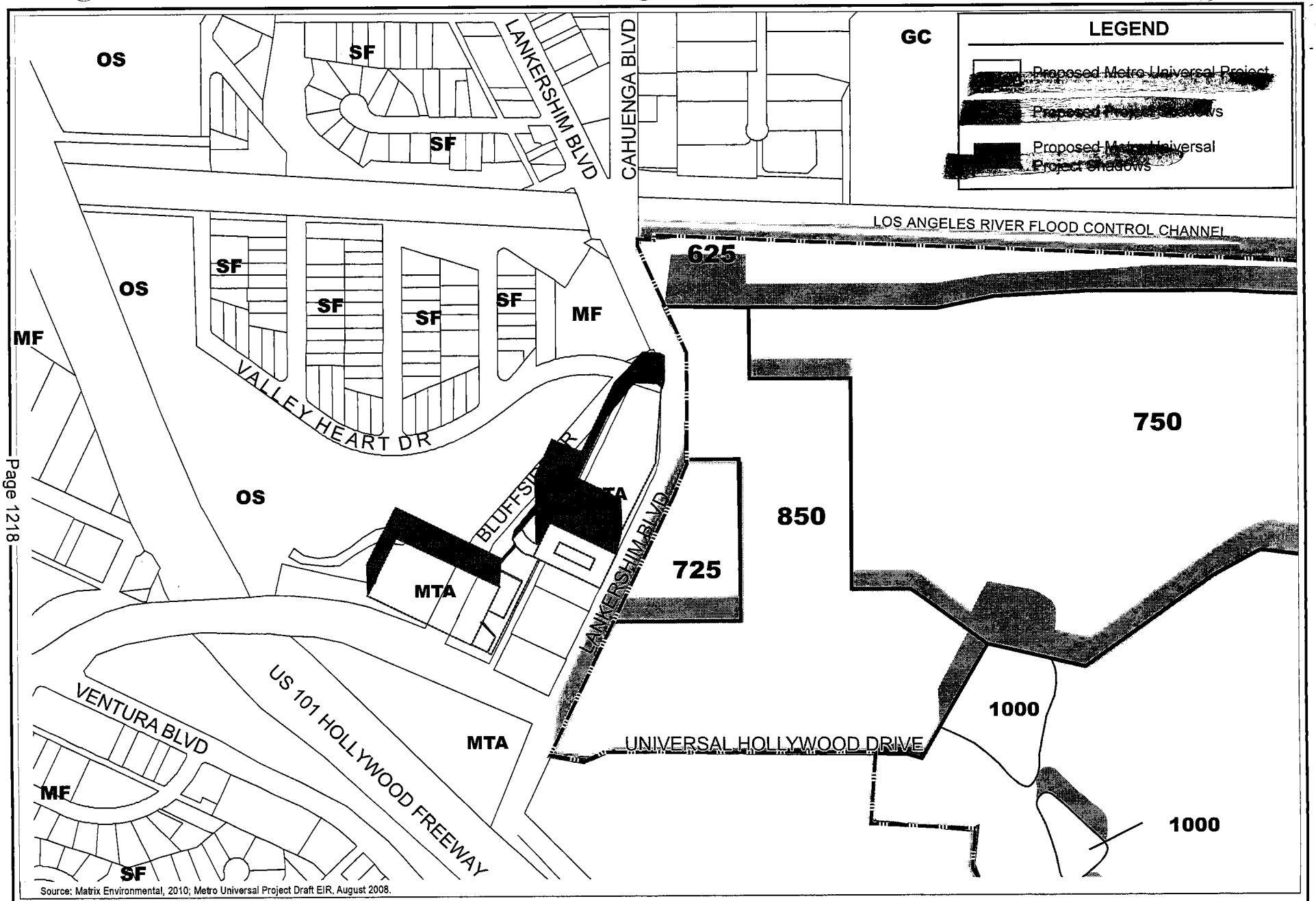
Figure 159

Cu[redacted]se 1

matrix environmental

Page 1217

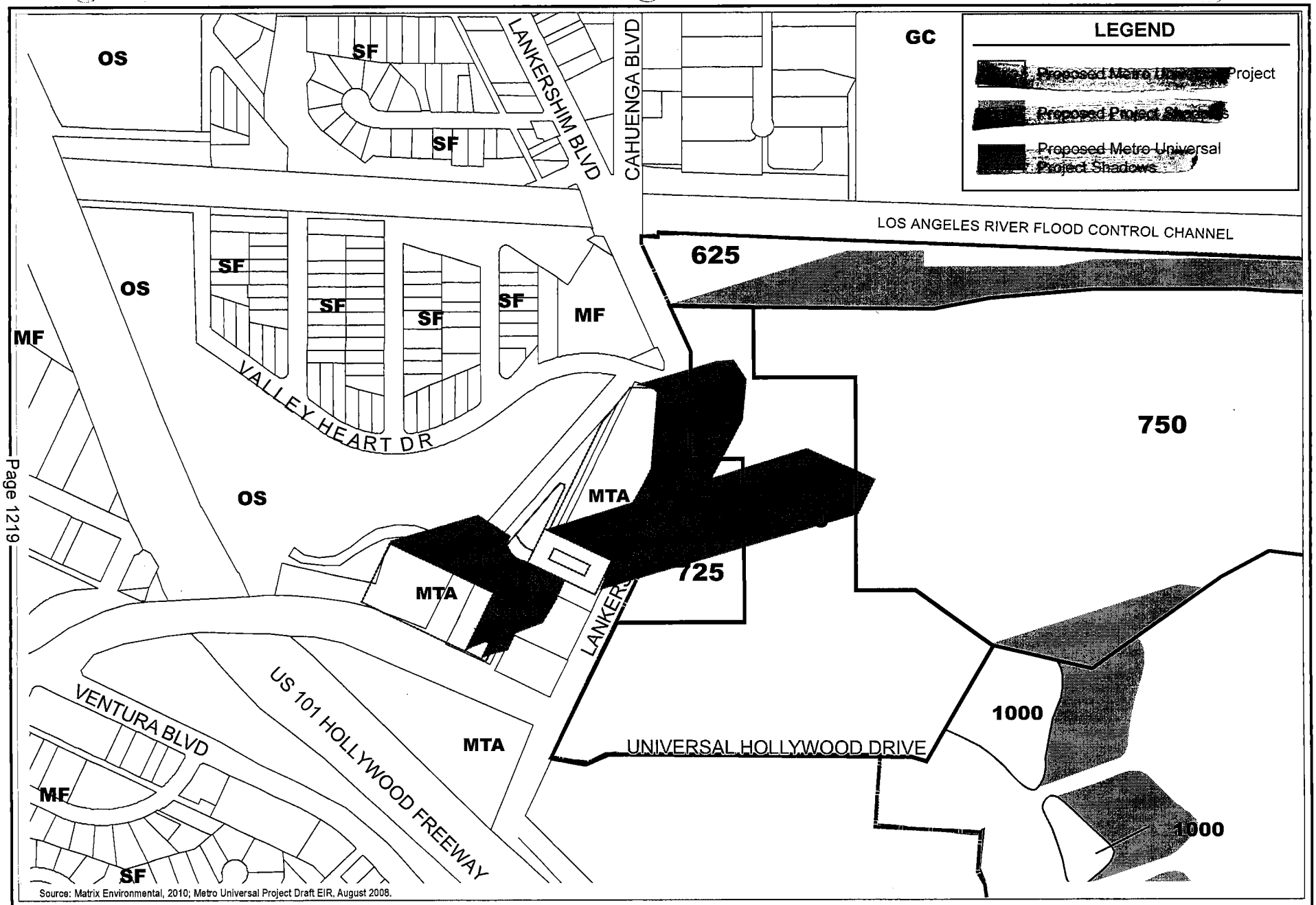
Appendix 6.6



Source: Matrix Environmental, 2010; Metro Universal Project Draft EIR, August 2008.

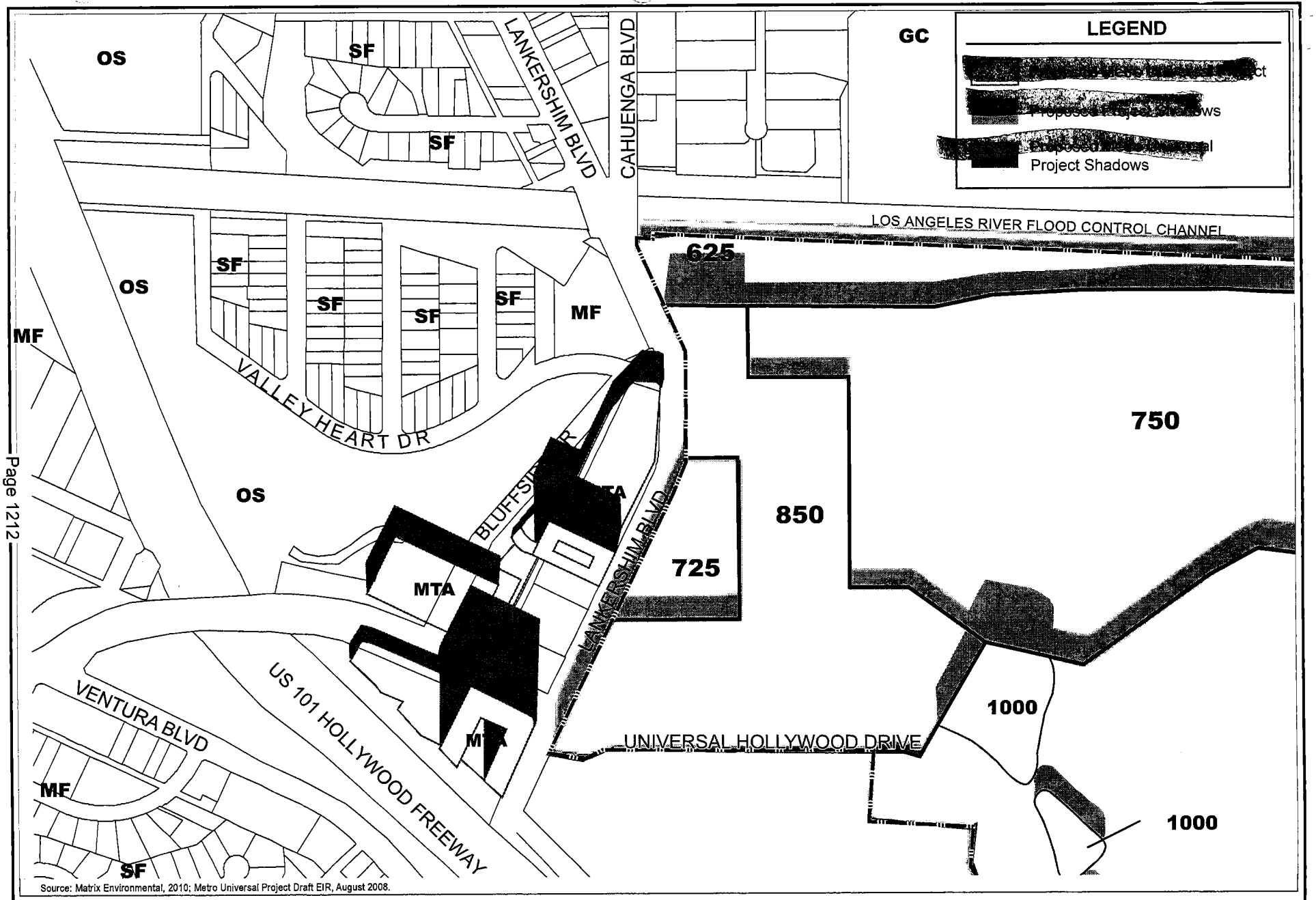
matrix environmental

Figure 4.6-[illegible]
[illegible] Shadows - Phase 1
Fall Equinox - 1:00 PM



matrix environmental

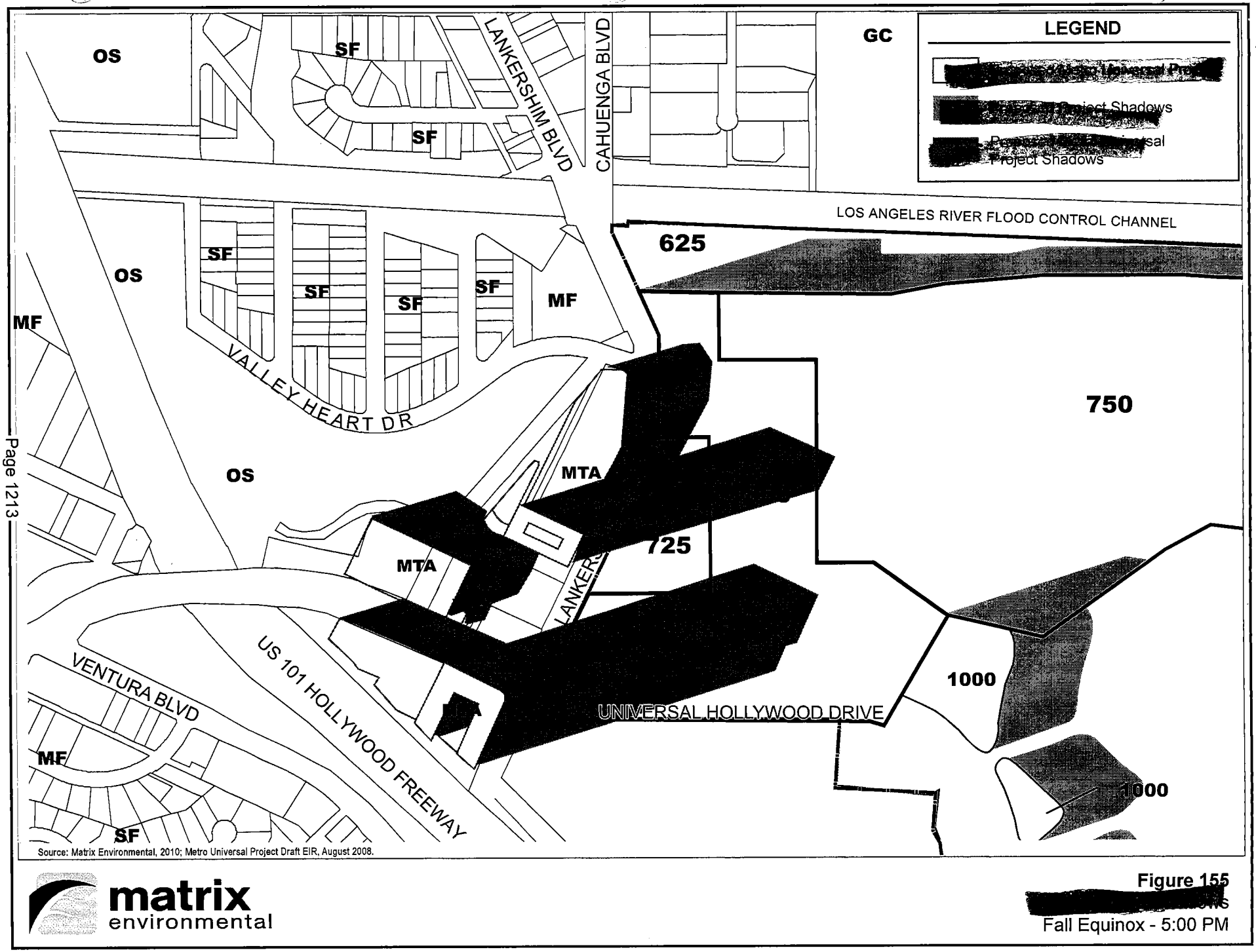
Figure 161
Cumulative Shadows - Phase 1
Fall Equinox - 5:00 PM



Source: Matrix Environmental, 2010; Metro Universal Project Draft EIR, August 2008.

matrix environmental

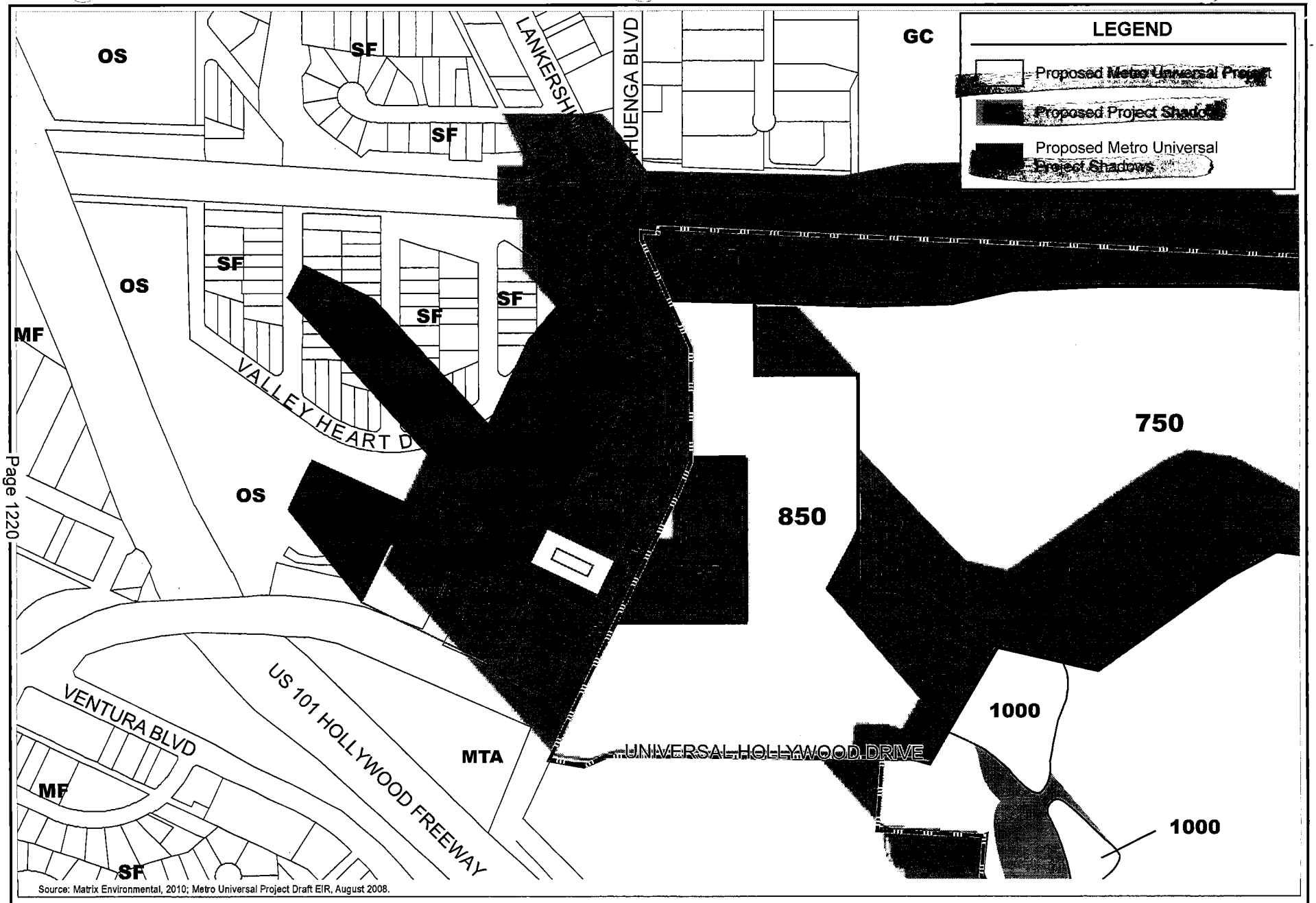
Figure 154
Fall Equinox - 1:00 PM



Source: Matrix Environmental, 2010; Metro Universal Project Draft EIR, August 2008.

matrix environmental

Figure 155
Fall Equinox - 5:00 PM

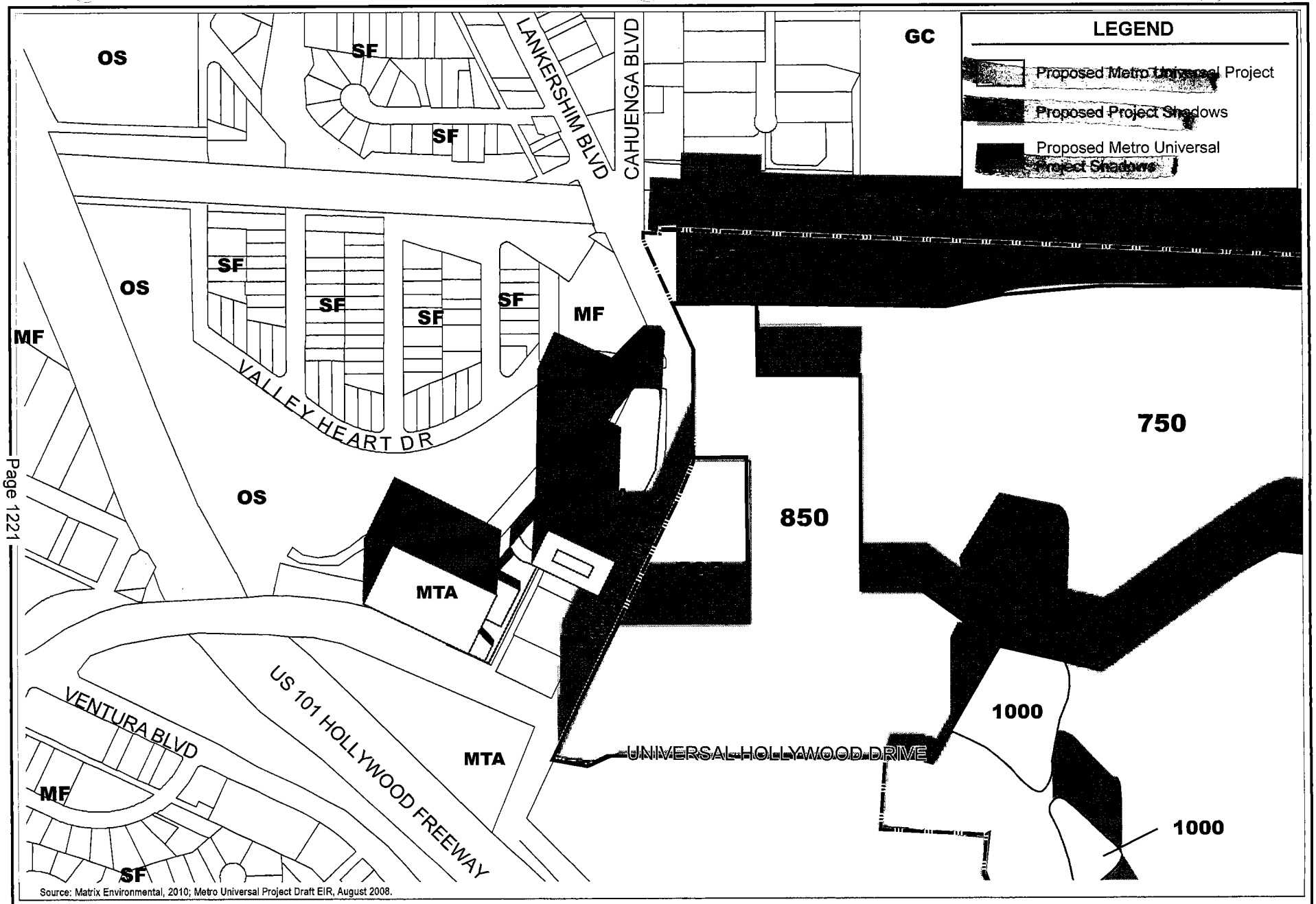


Source: Matrix Environmental, 2010; Metro Universal Project Draft EIR, August 2008.

matrix environmental

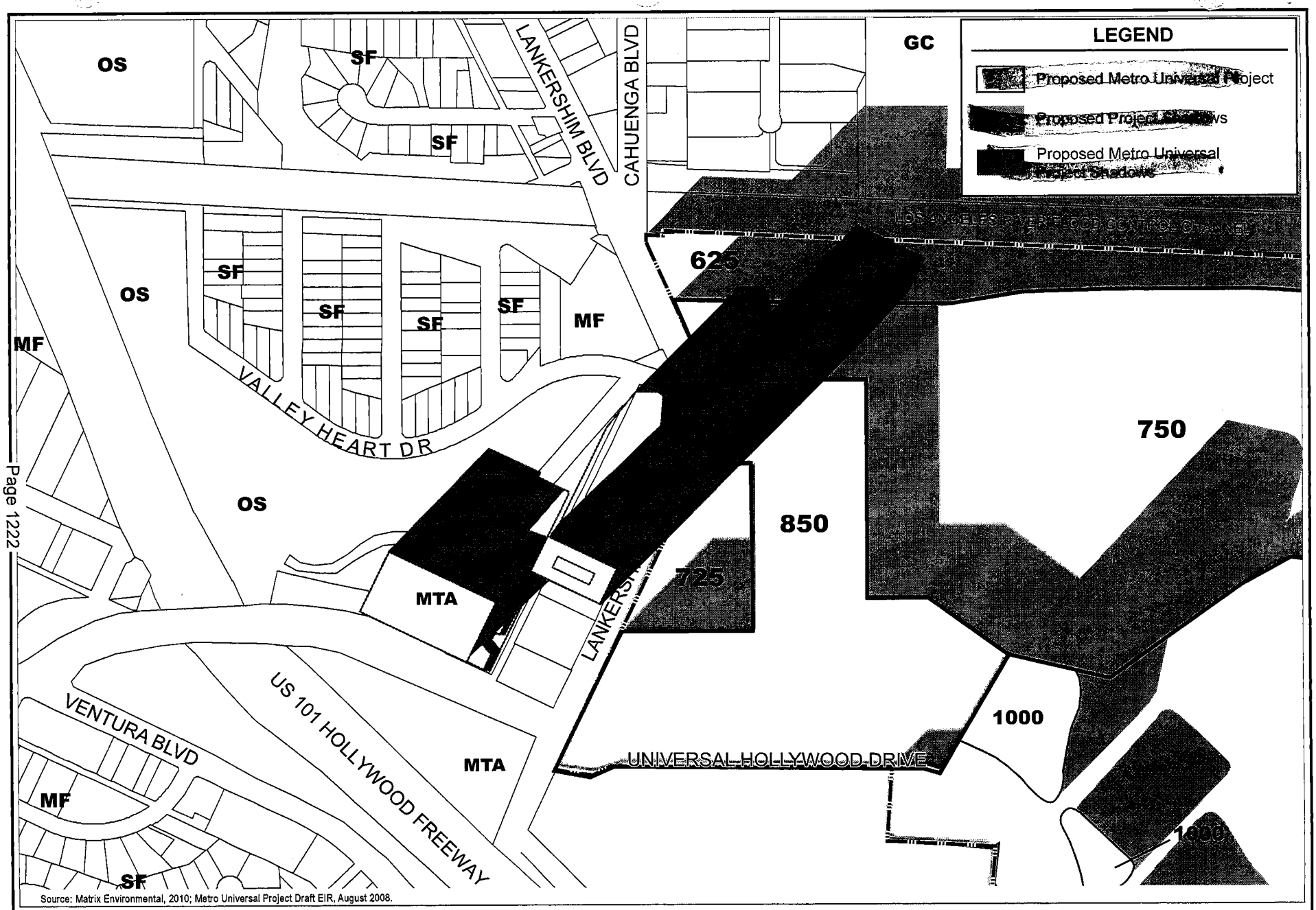
Figure 162
Winter Solstice - 9:00 AM

Page 1220



matrix environmental

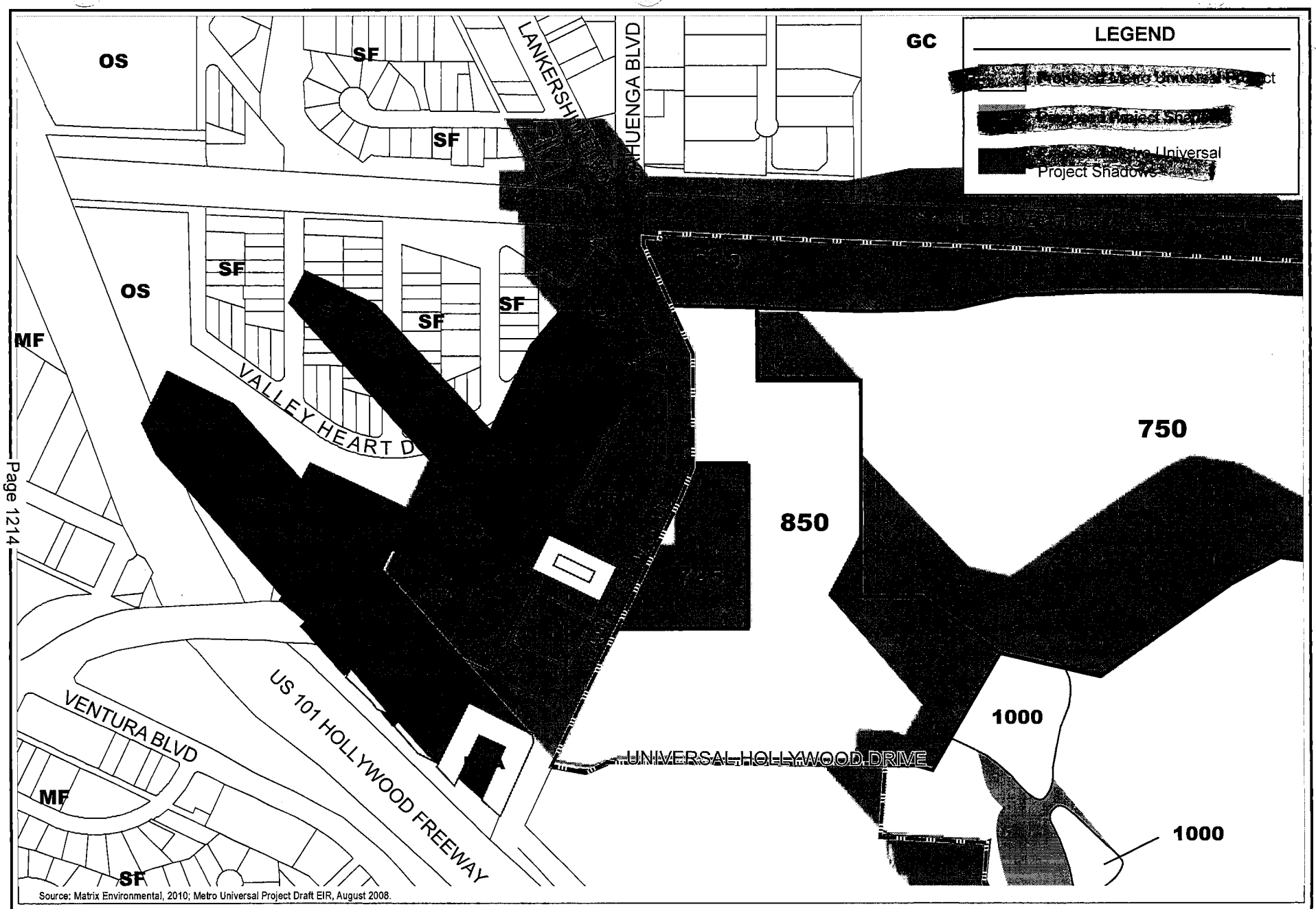
Figure 163
Cumulative Shadows - Phase 1
Winter Solstice - 12:00 PM



Source: Matrix Environmental, 2010; Metro Universal Project Draft EIR, August 2008.

matrix environmental

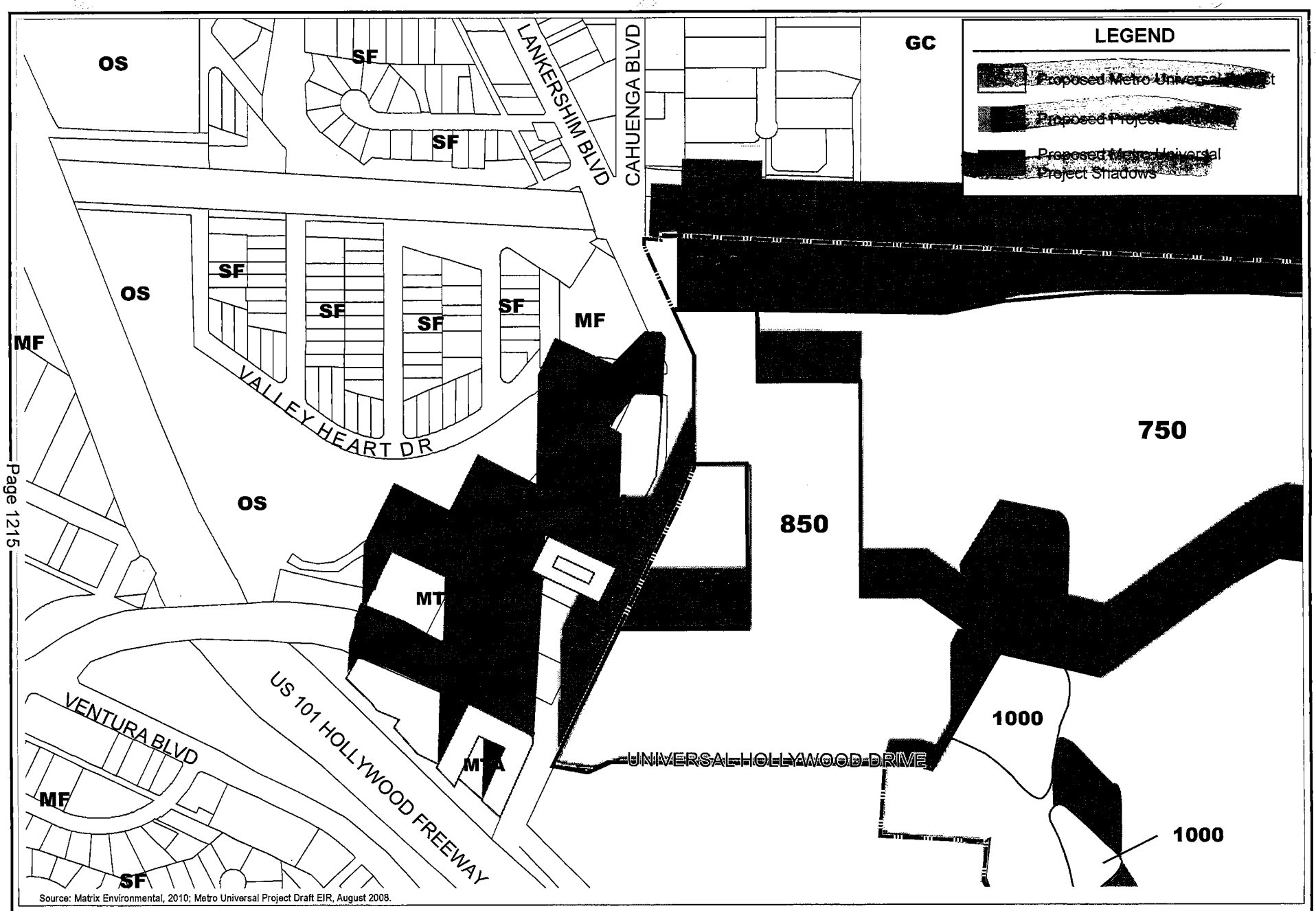
Figure 164
Cumulative Shadows - Phase 1
Winter Solstice - 3:00 PM



matrix environmental

Figure 156

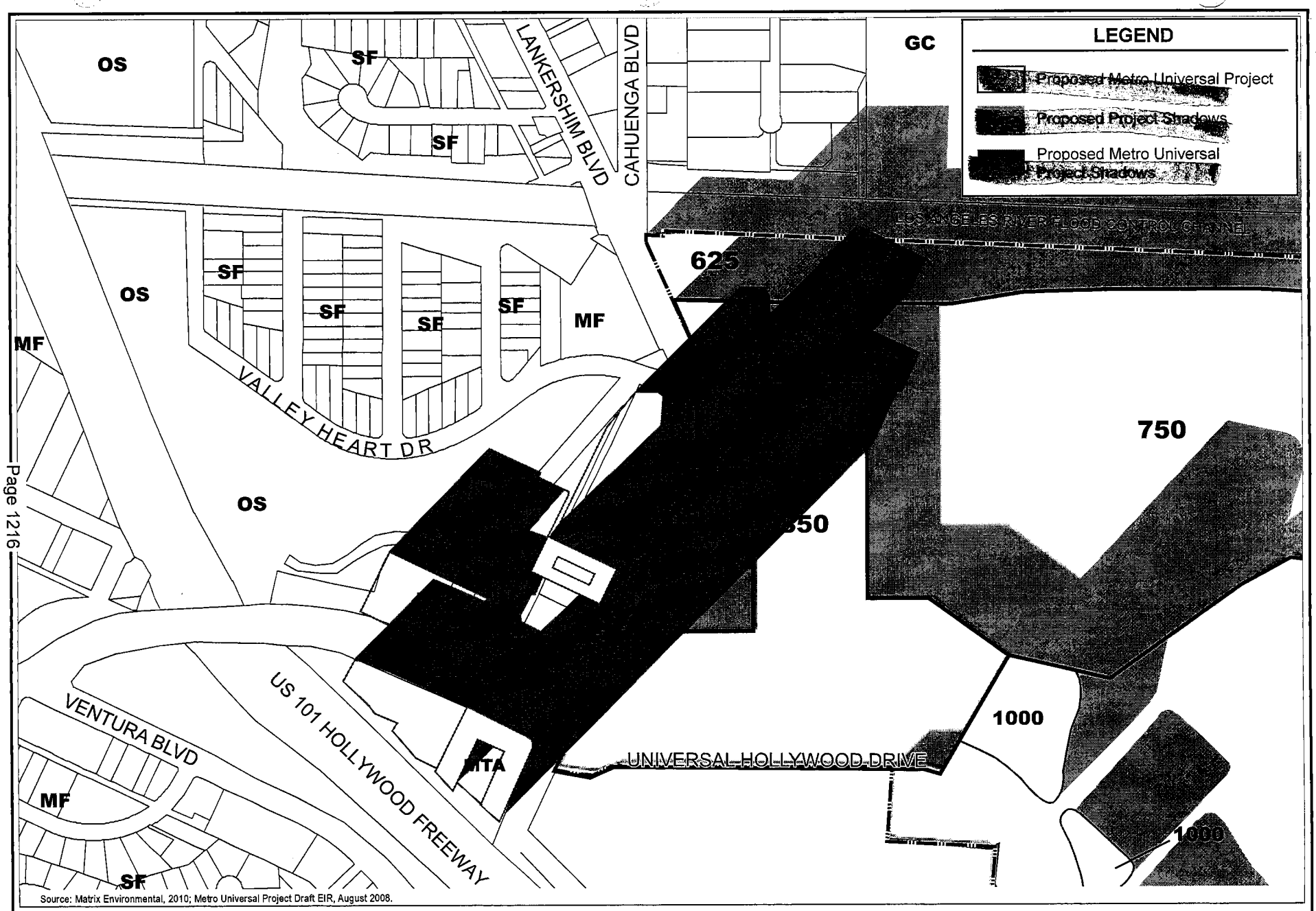
Winter Solstice - 9:00 AM



Source: Matrix Environmental, 2010; Metro Universal Project Draft EIR, August 2008.

matrix environmental

Figure 157
Winter Solstice - 12:00 PM



Source: Matrix Environmental, 2010; Metro Universal Project Draft EIR, August 2008.

matrix environmental

Figure 158
Project Shadows
Winter Solstice - 3:00 PM

Response to Comment No. 12-381

Appendix GG consists of a copy of Figures 159, 161, 154, 155, 162, 163, 164, 156, 157, and 158 on pages 1217–1219, 1212–1213, 1220–1222, and 1215–1217 from the Draft EIR and is referenced in Comment No. 12-44. As such, the commenter is referred to Response to Comment No. 12-44, above.

Comment No. 12-382

See next page

APPENDIX HH

NBC UNIVERSAL
EVOLUTION PLAN

NBC UNIVERSAL

Dear Neighbor,

As part of our ongoing effort to keep you informed about the NBC Universal Evolution Plan, we hope you will take a moment to review the enclosed pamphlet on the key improvements that our project will bring to Los Angeles.

The Evolution Plan is a 20-year blueprint for our 391-acre Universal City property and it is vital to our motion picture and television businesses on the lot, and to keeping entertainment jobs in Los Angeles in the future. Below are some key benefits of the proposed Evolution Plan:

- Creates 43,000 jobs in Los Angeles during the construction period and during operations
- Generates $26 million in new revenues to the City and County annually
- Invests $100 million in transit solutions throughout Los Angeles, which could potentially unlock over $200 million in federal and state funds
- Brings much-needed improvements to 138 intersections within a 50-square-mile area surrounding Universal City
- Builds a new north/south road to help alleviate traffic on Barham Boulevard
- Secures Universal Studios' place as the largest working studio in the world by updating our production facilities with new high-tech soundstages, outdoor sets, modern office space and new post production facilities
- Transforms a portion of our property into a new residential neighborhood with 35 acres of open space, parks and trails

If you would like to join thousands of your neighbors and become a supporter of the project, please fill out the enclosed postcard, or you can sign up online by visiting our website at www.nbcuniversalevolution.com. Also on our website, you'll find a summary of the City of Los Angeles' recently released Draft Environmental Impact Report on the Evolution Plan.

We look forward to working with you to make the NBC Universal Evolution Plan a reality and sharing updated information with you as the Plan moves forward.

Sincerely,

Tom Smith
Senior Vice President, West Coast Real Estate
NBC Universal

NBC UNIVERSAL
EVOLUTION PLAN

NBC UNIVERSAL

100 Universal City Plz · Universal City, CA 91608-9961

[redacted]

[redacted]

I want to personally thank you for your support of the NBC Universal Evolution Plan. The Plan is vital to our motion picture and television businesses on the lot and to keeping entertainment jobs in Los Angeles in the future. You have shared with us how excited you are about the Plan, especially the thousands of new jobs, the investment in the entertainment industry and the transit improvements that will result from the Plan. As a reminder, our Plan will:

- Create a **total of 43,000 new jobs** -- 31,000 jobs during the construction period and, once completed, 12,000 new full- and part-time jobs, **resulting in $26 million annually** in new tax revenues to the City and County of Los Angeles.
- **Invest $100 million** to accelerate local and regional transit improvements and work with Caltrans to improve speeds and traffic flow along five miles of the 101 Freeway.
- **Secure Universal Studios' place as the largest working studio in the world** by updating our production facilities with new high-tech soundstages, outdoor sets, modern office space and new post production facilities.
- Transform a portion of our property into a new residential neighborhood with **35 acres of open space, parks and trails.**

We invite you to take a moment to read the enclosed material and feel free to visit our website at **www.nbcuniversalevolution.com.**

We look forward to continuing our efforts to make the NBC Universal Evolution Plan a reality and sharing updated information with you as the Plan moves forward.

Sincerely,

Tom Smith

Thomas G. Smith
Senior Vice President, West Coast Real Estate
NBC Universal

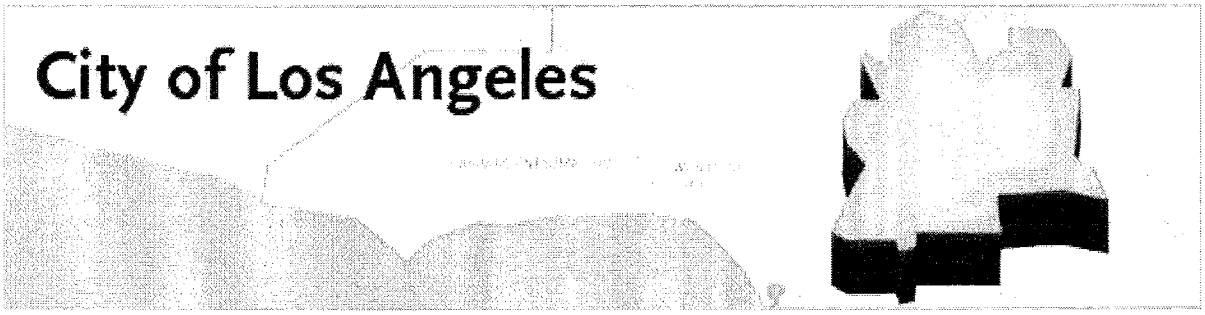
Response to Comment No. 12-382

Appendix HH consists of letters from Thomas G. Smith of NBC Universal regarding the proposed Project and is referenced in Comment Nos. 12-45, 12-46, 12-47, and 12-50. As such, the commenter is referred to Response to Comment Nos. 12-45, 12-46, 12-47, and 12-50.

Comment No. 12-383

See next page

Measure R Project Tracker



Project Name & Description	Funding	Status
Crenshaw/LAX Transit Corridor (project acceleration)*		
Accelerates construction of a line along the Crenshaw Bl Corridor and connects Los Angeles, Inglewood, Hawthorne and El Segundo, plus unincorporated LA County. Region(s): City of Los Angeles, South Bay cities More: Project Website	$1.21B	MIS/EIR/EIS/EA Final Phase
East Light Rail Access (Gold Line)		
Increases access, including pedestrian and bicycle, to the Gold Line Eastside Light Rail project. Region(s): City of Los Angeles More: Project Website	$30.0M	Ongoing
East San Fernando Valley North-South Rapidways: Canoga Corridor		Construction
Extends the Metro Orange Line north from Canoga Park Station to Chatsworth with a projected completion three years early. Region(s): City of Los Angeles, San Fernando Valley More: Project Website	$182M	
Exposition Bl Light Rail Transit: Culver City to Santa Monica*		
Extends the Exposition Rail Line, currently under construction to Culver City, to Santa Monica. Region(s): City of Los Angeles, Westside cities City: Los Angeles More: Project Website	$925M	MIS/EIR/EIS/EA Final Phase

Green Line Extension to Los Angeles International Airport* Links the Metro Green Line to LAX at the Aviation Station. Region(s): City of Los Angeles, South Bay cities More: Project Website	$200M	Initial Planning
Regional Connector: Links Local Rail Lines* Links four light rail lines that terminate at the edges of Central LA. Expected to provide seamless connections between Long Beach/Pasadena, and Culver City/East LA, minimizing the need for rail transfers. Region(s): City of Los Angeles, Gateway Cities, San Gabriel Valley, South Bay cities, Westside cities More: Project Website	$160M	MIS/EIR/EIS/EA Draft Phase
San Fernando Valley East North-South Rapidways (project acceleration) Accelerates bus service improvements, including possible dedicated bus lanes, on four potential East San Fernando Valley corridors, including Van Nuys, Sepulveda, Reseda and Lankershim. Region(s): City of Los Angeles, San Fernando Valley More: Project Website	$68.5M	Initial Planning Early Planning
Sepulveda Pass Transit Corridor Provides a rapid transit option to improve traffic flow between the Westside and the San Fernando Valley through the Sepulveda Pass along the I-405 freeway corridor. It will provide a viable alternative to driving on a heavily congested freeway. Specific transit technology and routing will be subject to approved plans developed in cooperation with local jurisdictions and affected communities. Region(s): City of Los Angeles, San Fernando Valley More: Project Website	$1.0B	Initial Planning
West Santa Ana Branch Corridor Provides for the development of a grade-separated transit corridor. Phase I is designed to go from the LA County line toward downtown LA. Region(s): City of Los Angeles, Gateway Cities More: Project Website	$240M	Alternative Analysis Study

Westside Subway Extension (to be opened in segments)*

Extends Metro Rail to the Westside. The project is expected to serve Century City and Westwood/UCLA.	$4.07B	MIS/EIR/EIS/EA Draft Phase

Region(s): City of Los Angeles, Westside cities
More: Project Website

I-405, I-110, I-105, SR-91 Ramp/Interchange Improvements: South Bay

Constructs improvements in the South Bay to reduce delays on the freeways. Examples include auxiliary lanes and ramp reconfigurations.	$906M	Initial Planning 

Region(s): City of Los Angeles

I-5 Capacity Enhancement: SR-134 to SR-170

Constructs one carpool lane in each direction along the I-5 freeway between SR-134/SR-170, including access improvement for Empire Av.	$272M	Final Design

Region(s): Arroyo Verdugo, City of Los Angeles

Here's how it works: The Measure R Projects Tracker lists the various projects in alphabetical order by category with a brief description of the project.[1] You can view the status for many of the projects with estimated Measure R funding allocations as projected over 30 years.[2]

**Specific mode and routing will be subject to approved plans developed in cooperation with local jurisdictions and affected communities.*
***Specific improvements are expected to be developed by local jurisdictions.*
****Partial funding by public/private partnerships is assumed to be part of the project plan.*

[1]Projects listed are for reference only and do not indicate priority order. Project definition depends on final environmental process.
[2]Measure R does not fully fund all projects.

Response to Comment No. 12-383

Appendix II consists of pages from the Measure R Project Tracker website and is referenced in Comment No. 12-48. As such, the commenter is referred to Response to Comment No. 12-48.

Comment No. 12-384

See next page

From: "Failing, Doug" <FailingD@metro.net>
Subject: Re: Second Request for a Reply [Fwd: Studio City]
Date: Fri, January 21, 2011 9:28 am
To: "'lsarkin@scnc.info'" <lsarkin@scnc.info>

Lisa,

Sorry for the delay in getting to you. I'm doing some fact checking with Caltrans. Certainly us at Metro are funding some soundwall projects in your area. I need to see where Caltrans is, given the state of the current budget, Caltrans is a little unsure as to their future budget capabilities and what existing projects will remain funded let alone adding new projects.

Doug

----- Original Message -----
From: Lisa Sarkin <lsarkin@scnc.info
>
To: Failing, Doug
Sent: Fri Jan 21 08:32:19 2011
Subject: Second Request for a Reply [Fwd: Studio City]

---------- Original Message ----------
Subject: Studio City
From: "Lisa Sarkin" <lsarkin@scnc.info
>
Date: Wed, January 19, 2011 1:04 pm
To: failingd@metro.net

Hi Mr. Failing:

We met at the 2008 Southwest Valley Neighborhood Councils' Townhall at the Beverly Garland Hotel.

Are you able to confirm to us what we believe you said about CalTrans funds coming to this area, which was zero? Is that still true?

Also, we don't see anything related to this same area within the Measure R improvements. Can you also confirm that for us?

Thank you for your assistance with this matter.

Best regards,

Lisa Sarkin
Studio City Neighborhood Council Board Member
Chair - Land Use Committee
SCNC (818) 655-5400 home office (818) 980-1010
fax (818) 980-1011 cell (818) 439-1674

Response to Comment No. 12-384

Appendix II-1 consists of a copy of an email from Doug Failing to lsarkin@scnc.info and is referenced in Comment No. 12-48. As such, the commenter is referred to Response to Comment No. 12-48.

Comment No. 12-385

See next page

APPENDIX JJ

NBC UNIVERSAL EVOLUTION PLAN

STUDIO CITY STAKEHOLDER COMMENTS & QUESTIONS

1. Why is the term "population growth" used?
2. Where is the financing coming from for the proposed Project?
3. Why is the Initial Study dated 2007?
4. Why does the DEIR have "Vision" and not "Evolution" Plan shown in some areas?
5. Why would the Metro Universal Project mitigations be shared with the Evolution Plan?
6. Why are impacts to Ventura and Cahuenga Boulevards left out of the DEIR?
7. How will road conditions, caused by the proposed Project construction be repaired?
8. What is being done to eliminate sound issues?
9. What is being done to eliminate air pollution from idling trucks?
10. Why are the proposed schools over the hill?
11. What benefit to health and quality of life does this proposed Project give to those already living in Studio City?
12. What will be done to control HAZMAT?
13. Is water being drained out of the aquifer? Will that affect the hillsides?
14. What will be done for wildlife and natural habitat with the reduced water levels?
15. What happened to the underpass under Lankershim Blvd. from the Metro Station?
16. Now that COMCAST will buy NBC Universal, will the proposed Project change?
17. Why would the East/West road be eliminated?
18. How is it possible to put in additional lanes on Barham when there are houses on the top of the hill and in some locations there is no room to expand?
19. Why are the City and County Specific Plans less restrictive than the current codes? Basically, the proposed Project would have carte blanche to do whatever they want at any time?
20. "The US 101 Interchange Improvements at Universal Terrace Parkway (Campo de Cahuenga Way) would require the use of Metropolitan Transportation Authority and Caltrans Park and Ride Facility overflow lot ("Caltrans Overflow Lot") along Ventura Boulevard; and the Metro Transportation Authority and County Park and Ride Facilityoverflow lot, also along Ventura Boulevard ("County Overflow Lot") for construction staging. If Phase 1 of the proposed Metro Universal project is constructed prior to the construction of the US 101 Interchange Improvements, the temporary loss of parking in both of these overflow parking lots would be accommodated in the proposed Phase 1 Metro Universal parking facility. If the Metro Universal project is delayed or does not go forward, the temporary loss of parking in the overflow parking lots would be addressed by the Applicant providing substitute parking in the vicinity and shuttle service from the substitute parking to the Universal City Metro Red Line Station during the hours of operation of the Red Line." This would significantly affect Ventura Blvd. in Studio City, plus where would they put the overflow parking?
21. The project's timeline for completion is 20 years - is that a best-case scenario or are there issues that could cause this project to take longer to build? What

22. if the project takes longer; what additional transportation mitigation measures would then take place?
23. Is the City of Burbank and City of West Hollywood under any legal or moral obligation to do all or any of the recommended mitigation measures?
24. What happens to the 101 freeway if Caltrans does not complete all of the recommended mitigation measures? Where does the State of California get the money to complete all recommended construction? How long will it take for the construction to be completed if the State of California only partially comes up with the ONE HUNDRED MILLION DOLLARS that is being projected to complete all 101-freeway construction? Is there anything in Caltrans' current or future budget to construct everything that needs to take place to the 101-freeway for all mitigation measures?
25. Since this project is being touted as a Transportation Oriented Development (TOD) does the heavier use of the Red Line significantly influence the already 250 million dollar operating deficit the Metro is currently experiencing? When does the Metro believe it will no longer be operating at a loss? Who covers the greater use of the Red Line costs -- the more the Red Line, Light Rail, Bus Rapid Transit (BRT) or other forms of Metro's public transportation are put into use the more the Metro and ultimately the taxpayer lose money. My question is, if this project touts the additional usage of the Red Line will NBC Universal, Comcast or whatever entity owns the development cover the additional expense of the Red Line?
26. What is the maximum daily capacity of the Red Line? Can additional cars be added to it and if so, who pays for that cost? Can adding additional tunnels or light rail to handle additional riders expand the Red Line and if so, who covers those costs?
27. How many riders are projected for the Red Line each year during construction and when the project is completed? What is projected rider-ship for all phases of construction? Are construction workers included in these numbers?
28. What specifically is NBC Universal going to do to make employees and guests use the Red Line, Buses, Carpools, Vanpools, Telecommuting or other forms of mitigation measures specifically mentioned in the DEIR to get people out of their cars? What are the incentives to make people get off congested roads and the 101 freeway?
29. Who oversees and enforces all traffic mitigations? What happens if they are not completed? What is the time-frame for completion?
30. In Studio City, there is currently either proposed or under construction the Colfax Bridge, LA DWP Trunk Line Replacement Projects(s) and the Equinox Gym on Ventura Boulevard which will and are greatly affecting vehicular and pedestrian mobility - have any of these projects been factored into traffic counts or mitigation measures?

STUDIO CITY RESIDENTS ASSOCIATION
Your Advocate for Studio City

P.O. Box 1374 • Studio City, CA 91614 • Ph (818)509-0230 Fax (818)509-0260 • www.studiocityresidents.org

February 3, 2011

John Foreman, Senior City Planner
Department of City Planning, Room 601,
City Hall Room,
Los Angeles, CA 90012

NBC Universal Evolution Plan
Draft Environmental Impact Report
ENV 2007-0254-EIR
State Clearing House No: 200707-1036

This is the response of the Studio City Residents Association to the draft environmental impact report.

1. THE DRAFT ENVIRONMENTAL IMPACT REPORT IS LEGALLY INADEQUATE: IT IS PROCEDURALLY DEFICIENT

The Draft Environmental Impact Report (DEIR) referenced above addresses a proposed development that presents significant and in some cases severe impacts not only on the surrounding neighborhood but on other significant areas of Los Angeles and adjoining cities. The project is commonly referred to as the NBC Universal Evolution Plan and shall be referred to as such herein.

2. THE DEIR SHOULD BETTER REFLECT THE METRO UNIVERSAL PROJECT

One major defect and inadequacy of the DEIR for NBC Universal Evolution Plan is an inability or unwillingness to incorporate and thereby evaluate the effect of a proposed Metro Universal Project development immediately across Lankershim Boulevard at the MTA Redline Station (and the environmental effect on not just on the NBC Universal Evolution Plan but on the surrounding environments.)

In process with the City of Los Angeles is the DEIR for the Metro Universal Project to which public and other comments and responses have been filed. To date no final Environment Impact Report has been issued, approved or accepted for the Metro Universal Project. It is only upon the acceptance and approval of the Environment

Impact Report for the Metro Universal Project and the issuance of permits with conditions that the environmental impacts and the mitigation measures from that project will become known and can be reflected in the EIR for this project. Until this information is available then the DEIR for NBC Universal Evolution Plan is defective and fails to comply with the intended purposes of CEQA.

3. THIS DEIR AND THE EIR TO FOLLOW DOES NOT COMPLY WITH CEQA.

The purpose of a DEIR is to provide the public with detailed information about a Project before it is approved. (Pub. Resources Code §§ 21002.1; 21003.1.) "When significant new information is added to the EIR after public notice is given of the availability of the DEIR, but before certification, the EIR must be recirculated for public review. . . ." (CEQA Guidelines § 15088.5; Pub. Resources Code § 21092.1.) Any recirculated Draft EIR should contain redline or other convenient methods of comparing the recirculated Draft EIR to the original. The NBC_Universal Evolution Plan will be relying on unverifiable future projections rather than established facts therefore NBC Universal Evolution Plan DEIR is grossly inadequate. *Sunnyvale West Neighborhood Assn. v City of Sunnyvale City Council H 035135 Dec 16, 2010.* The City must recirculate a DEIR after verifiable and legally adequate information is added. It will not be possible to rely upon the filed Responses in order to cure the draft's inadequacies.

4. SIGNIFICANT AND UNMITIGATED IMPACTS EXIST.

In addition, the NBC Universal Evolution Plan DEIR references "Significant and Unmitigatable Impacts". These impacts that cannot be mitigated commence at page 255 though page 373. These "Unmitigatable Impacts" refer to impacts that cannot be prevented or that no preventative measures can be taken for various reasons. The impacts on the community cannot "...be reduced to a level of insignificance" (p.255). yet it is proposed that these impacts remain and not be mitigated. Again, this is contrary to the requirements of CEQA.

The impacts are:

Solid Waste, Traffic, Noise and Air Quality.

When the NBC/Universal DEIR categorizes an impact as SIGNIFICANT and UNAVOIDABLE and no remedial action possible, this has effect of having making the report fail in its primary purpose.
Ignoring significant and unavoidable impacts has the effect of making an Environmental Impact Report deficient, incomplete and failing to be effective in addressing environmental impacts and concerns.
The DEIR does not state on what basis the significant and unavoidable impacts will be allowed and that will permit a project to go forward

5. INCORPORATION OF OTHER RESPONSES.

Studio City Residents Association joins the following organizations in their comments and objections and other matters raised their filings to the NBC Universal Evolution Plan DEIR and incorporates those comments and objections in this response as though set forth in full herein.

Communities United for Smart Growth
Studio City Neighborhood Council.

Respectfully submitted,

Alan Dymond
President
Studio City Residents Association

COMMENTS ON WATER:

AN ANALYSIS OF THE DWP'S URBAN WATER MANAGEMENT PLANS DATING BACK TO 1985 SHOWS THAT LONG TERM WATER PROJECTIONS HAVE BEEN GROSSLY OVERSTATED ON A ROUTINE BASIS IN ORDER TO ALLOW DEVELOPMENTS TO OCCUR.

EVERY REPORT FROM 1990 THROUGH 2007 HAS SHOWN AN OVER PROJECTION OF WATER SUPPLIES – YET THE DWP DOES NOT SHOW THOSE PUBLICATIONS OR PROJECTIONS.

WITH HUNDREDS OF PROJECTS RESULTING IN TENS OF THOUSANDS OF HOUSING UNITS BEING APPROVED OVER THE LAST TWENTY YEARS, EACH CITING THE UWMP AS EVIDENCE OF AVAILABLE WATER AND ACTUAL DELIVERIES AVERAGING FAR LESS THAN ANY OF THE PROJECTIONS – IT IS NOT DIFFICULT TO SEE WHY SOUTHERN CALIFORNIA HAS BECOME MIRED IN A PERMANENT DROUUGHT.

ALLOWING FURTHER DEVELOPMENT WILL ONLY DEEPEN THE ALREADY EXISTING DROUGHT IN SOUTHERN CALIFORNIA.

THERE IS HARD EVIDENCE AVAILABLE TO VALIDATE THIS.

STATE LAWS LIKE SB 610 AND SB 221 ARE SUPPOSED TO PROTECT WATER SUPPLY BY REQUIRING PLANNERS AND DEVELOPERS TO PROVIDE WRITTEN VERIFICATION OF SUFFICIENT SUPPLIES BY WATER AGENCIES, HOWEVER THE LAWS WEAKNESS IS THAT IT ALLOWS DEVELOPERS, PLANNERS AND WATER AGENCIES TO MERELY CITE UWMP "PROJECTIONS" TO GET APPROVED – INSTEAD OF "REAL" WATER!

THAT IS AND CANNOT BE AN ACCEPTABLE COURSE TO FOLLOW.

THIS LACK OF ANY CRITICAL REVIEW LEADS TO A DEEPER DROUGHT.

WATER IS A KEY ELEMENT – A WATER ASSESSMENT IS A MANDATORY ELEMENT TO THE PLANNING PROCESS. AS A PREREQUISITE TO APPROVING A NEW PROJECT, A DEVELOPER OR CITY PLANNER HAS TO PROVIDE EVIDENCE THAT THERE IS "SUFFICIENT WATER" IN NORMAL AND DRY YEARS OVE THE NEXT TWENTY YEARS FOR THEIR PROJECT.

THIS DOES NOT EXIST IN THE EVOLUTION DEIR AND IS THEREFORE UNACCEPTABLE.

Projections Routinely Overstate Actual Supplies

print

LA'S URBAN WATER PLAN

David Coffin

How is it that every small, medium and large development or project that comes before neighborhood councils, city planners and the city council is always cited by both developers and the water department as having 'sufficient water' yet we find ourselves in the grips of a permanent drought and under an emergency water conservation order?

An analysis of Department of Water and Power's Urban Water Management Plans dating back to 1985 shows that long term water projections have been grossly overstated on a routine basis by as much as 41 percent leading planners and decision makers to believe that sufficient water would be available when projects before them were being evaluated.



This study compared the amount of water projected in each regularly published UWMP with the actual amount of water later received and found that not since the 1985 report have projections come acceptably close.

Every report from 1990 to 2005 has routinely projected water deliveries well above 700,000 acre feet with some projections as high as 799,000 AF. Yet a review of historical data shows that LADWP has only once received more than 700,000 AF in the last 30 years and rarely have actual deliveries exceeded 680,000 AF.

In spite of this, 13 out of 16 forecasts from the last four water management plans had water deliveries projected at over 700,000 AF. They were:

- The 1990 Urban Water Management Plan with 'projected' deliveries of 707,300 AF in 1995, 728,400 AF in 2000, 745,500 in 2005 and 756,500 AF in 2010.

- The 1995 plan with 'projected' deliveries of 673,000 AF in 2000, 695,000 AF in 2005, 725,000 AF in 2010, and 750,000 in 2015.

- The 2000 plan with projected deliveries of 679,000 AF in 2005, 718,000 AF in 2010, 757,000 AF in 2015, and 799,000 AF in 2020.

- The 2005 plan with projected deliveries of 683,000 AF in 2010, 705,000 AF in 2015, 731,000 AF in 2020, and 755,000 in 2025 and 776,000 in 2030.

With hundreds of projects resulting in tens of thousands of housing units being approved over the last twenty years, each citing the UWMP as evidence of available water and actual deliveries averaging only 624,123 AF a year, it's not difficult to see why Southern California has become mired in a permanent drought.

GROUNDLESS OPTIMISM IN FUTURE WATER

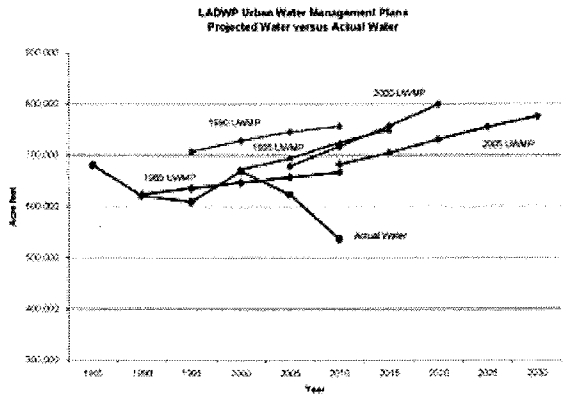
1990 UWMP REPORT			
Year	Projected	Actual	Percent overstated
1986			
1990	689,900	621,476	11.0%
1995	707,300	608,754	16.2%
2000	728,400	669,549	8.8%
2005	745,500	623,438	19.6%
2010	756,500	536,554	41.0%
2015			
2020			
2025			
2030			
BOLD numbers are average yearly yield (1987/2009)			

Why are we routinely committing new water to every new housing project that is proposed when actual deliveries chronically fall short of projected deliveries? And why are laws designed to protect water supplies such as SB 610 and SB 221 failing to over-commitment water?

Exaggerated projections are not only an LADWP phenomena; many regional water districts also seriously overstate future supplies in their water plans. UWMP data suggests that water supply projections are developed to meet regional housing needs assessments (RHNA) that are distributed by local multi-county government agencies such as SCAG.

Rather than using infrastructure such as water and power as a determining factor in housing growth thus protecting water supply, the opposite occurs. Housing targets are cited first and water departments tweak their projections dramatically to achieve those goals. Even if it means citing projections that can never be met.
Because water projections are overstated by such large margins, this all but guarantees that every new housing project proposed within the scope of the UWMP will be green-lighted as having sufficient water supplies by LADWP officials.

A DROUGHT IN THE PLANNING
Distinct from the drought of 1987 where growth was the primary factor, today's drought has its roots dating back to the 1990 UWMP when the long term projections inexplicably rose 10 to 12 percent over the previous UWMP. Urban Water Management Plans were supposed to provide a layer of protection for our water supplies after the 1987 drought, but instead the new projection models have been used to assure project approvals.



The increased projections in UWMP's are primarily due to overly optimistic projections in groundwater and to a lesser extent recycled water, seawater desalinization, the collection of urban runoff, other forms of water conservation. On top of that is a big dose of MWD purchases to make up for the shortfall.

For example, the last four UWMP's cited increased groundwater yields ranging between 106,000 and 170,000 AF. However groundwater yields dropped significantly in 2000 and the actual deliveries never materialized. The actual yields of underground water averaged about 86,000 AF and were as low as 48,000 AF.

Similarly recycled water is cited to increase to 15,000 to 29,000 AF in the latest water plan but the average amount received between 2000 and 2009 has only been 3,457 AF. This year's recycled water is 118% below 2005 UWMP projections.

Water plans also rely heavily on imported MWD water to make up the shortfall but that supply is uncertain as MWD struggles to procure enough water from the State Water Project and Colorado River to deliver to water not only to the LADWP but also the dozens of other water agencies all over the Southern California region.

State laws like SB 610 and SB 221 are supposed to protect water supply by requiring planners and developers to provide written verification of sufficient supplies by water agencies. However the laws weakness is that it allows developers, planners and water agencies to merely cite UWMP 'projections' to get projects approved instead of 'real' water.

Another weakness is that neither SB 610 or SB 221 require that UWMP's be accurate, nor do they require the figures to be reviewed, updated or amended as actual supplies come in at the projected times. The projections that were approved in the original plan remain continue to be cited for as long as five years later. Even when supplies dwindle to record per capita lows.

Since there is no requirement by law to review actual deliveries against projections, this virtually guarantees that projects of any size will be assured to receive a letter by LADWP acknowledging sufficient water supply when the plans targets have not been met in the past,.

LACK OF CRITICAL REVIEW LEADS TO DROUGHT

As the last twenty years projections in urban water management plans have become so overstated, even contrived, this has led to an absence of critical review by people who review and make decisions about a project. After all, if we have 680,000 AF of water today and in 2010 we are expecting to reach 750,000 AF what is there to worry about?

Planning commissioners, elected leaders, neighborhood councils and community residents have generally treated the conclusions of 'sufficient water' in each report as 'fact' when new developments come to them for approval.

This lack of critical review is repeated over and over again and is especially in plain view when questions are raised or when written comments to draft environmental documents for new developments cite the obvious disconnect between 'sufficient water' and the recent need for the Emergency Water Conservation Order (2008) and later the mayor's Water Supply Action Plan (2008). City planners and developers routinely dismiss the comments out of hand by merely pointing out the latest UWMP cited in their EIR and the future water projections in them.

WATER - A KEY PLANNING ELEMENT

A water assessment is a mandatory element to the planning process. As a prerequisite to approving a new project, a developer or city planner has to provide evidence that there is 'sufficient water' in normal and dry years over the next twenty years for their project.

Evidence that a project has the water it needs is typically provided by citing the latest UWMP in the projects Environmental Impact Reports (EIR) and obtaining a letter from the water agency acknowledging the availability of water over this twenty year period. Water agencies themselves generally just cite their own UWMP in the acknowledgement.

Similarly, cities and counties must demonstrate in their housing plans that they have sufficient water

supplies if growth is projected in their General Plan.

Because of this, the Urban Water Management Plan becomes a vitally important document to the planning process. If reports consistently overstate the amount of available water, planners ratchet up the housing production and approvals to meet established housing goals. Years later when water supplies do not meet the previously cited water projections, emergency solutions have to be enacted to minimize environmental damage and keep the taps flowing. This is the situation that exists today.

INFRASTRUCTURE IMBALANCE

Overstating future water supplies in water management plans results in housing inventories that outstrip water availability. This imbalance affects local residents by reducing their base price (Tier I) allocations, produces higher water bills, forces a curtailment of outside irrigation, and creates penalties. And it doesn't stop there, both the Central and Southern California regions have been seriously affected as drought restrictions have led California's agriculture industry to fallow land and lay off workers resulting in a loss of one billion dollars to the state in 2009.

THE URBAN WATER MANAGEMENT PLAN

Why is an accurate Urban Water Management Plan so important?

No single document is more regularly cited in the dozens of Draft Environmental Impact Reports (DEIR) submitted by developers to the city planning department and approved by planning commissions and city councils than the Urban Water Management Plan.

In order for the public and decision makers to understand how a large proposed project will impact neighbors, traffic, sewers, water, power, fire, police, libraries, parks, etc., an environmental impact report is drawn up.

The projects DEIR provides important details on infrastructure, traffic, demographics, demands for public safety and community services, and other information. Go online and download any of the dozens of DEIR's that the city makes available and you will find the UWMP cited in the Utilities section. When DEIR's are first published there is a comment period where the public is invited to comments on the project.

When questions and comments on the project are received, they are answered and noted and then added to the appendix of the final report. When completed and published in its final form the document becomes known as the Final Environmental Impact Report or FEIR. It is this document that zoning administrators, area planning commissions, and city officials review when deciding to approve or deny a project.

With tens of thousands of "housing units projected" to be proposed and built in the city of Los Angeles between 2006 and 2014 it is of the utmost importance that the information provided for these reports be accurate otherwise serious infrastructure imbalances will occur as successive projects are green-lighted.

THE BUNDY EXAMPLE

As noted before, water assessments provided for major projects rely entirely on the original projections published in the water plan. A projects water assessment completely ignores the -actual- supplies received after the water plan was published approved.

I could have picked any project since they all cite water availability the same way but the Bundy Village and Medical Park was most convenient. This projects Water Supply Assessment (WSA) was based on "water supplies available during normal, single-dry, and multiple dry water years during the 20-year projections" like all other assessments. It was predictably approved later on by the LADWP Board of Water and Power Commissioners which cited the 25 year projection of 776,000 AF in the 2005 UWMP as evidence of sufficient water for the project.

In response to the projects DEIR, one local neighborhood council submitted a comment asking that the Water Supply Assessment be re-evaluated in light of the fact that the city reduced water supplies due to drought and regulatory restrictions."

The planning department's reply to the neighborhood council comment merely restated the water supply assessment saying that it "continued to remain adequate" citing sections of the California water code and noted that the twenty year projection is sufficient to meet water demand. It sidestepped the request to re-evaluate the water supply assessment and punted that task to elected officials who would have to approve the project.

City planners always quote the results of a UWMP as 'fact' while ignoring the years of projections that were not met including 2005 UWMP projection of 718,000 AF by 2010 cited in the plan. Next year's level is not likely to come close to being achieved given this year's delivery of 536,554 AF reported by LADWP. They also ignore the historical fact that every previous UWMP's projection above 700,000 has been missed and missed by far, ranging from 60,000 to 190,000 AF.

Looking at historical indicators there no category of supply (aqueducts, groundwater, recycled, MWD, etc.) there to believe that anything above 699,000 AF can be routinely reached now or in the future. The last four water management plans, an expensive product to produce, have not been worth the paper they are written on.

Basing today's planning policies on doubtful long range future water projections that trend up while real supplies trend down or flat is a fool's game and one that will irreversibly damage the community economically and in quality.

*(David Coffin is a long-time activist and an occasional contributor to CityWatch. He blogs at **westchesterparents.org** and can be reached at **david@westchesterparents.org**)* -cw

CityWatch
Vol 8 Issue 92
Pub: Nov 19, 2010

From: hippolady@roadrunner.com
Subject: Complete Comments: NBC Universal Evolution Plan
Date: Mon, December 20, 2010 10:46 am
To: jon.foreman@lacity.org
Cc: mariana.salazar@lacity.org

Name: Lisa Sarkin (speaking personally)
Organization: Studio City Neighborhood Council
Address: 11603 Kelsey Street, Studio City 91604
Phone: (818) 980-1010 home (818) 439-1674 cell

My comments are simple with respect to Studio City, please consider them to be questions:

The current proposed project, NBC Universal Evolution Plan, is too large for the southeast valley and the proposed City Specific Plan takes away too many checks and balances from the local communities.

Unfortunately, the city and county did not take the advice of the Studio City Neighborhood Council to combine the two projects on both sides of Lankershim Blvd. and on Barham Blvd. into one EIR. BUT the Evolution DEIR mentions the Metro/Universal Project with combined mitigations that do not satisfy the communities for Metro alone. Shared parking is proposed in an area that already has major parking problems. There is no circulation in the area, but removing the required East/West street is being requested. The consideration that the residential community on the east side of the lot is Metro adjacent is not mitigated by a shuttle service through the lot or onto Barbam Blvd., Ventura Blvd., Cahuenga Blvd., Moorpark Street or Riverside Drive.

Numerous places in the Metro DEIR unavoidable impacts are listed, so adding the Evolution to these mitigations will make those unavoidable impacts even more pronounced. Plus, the Metro mitigations do not reduce the level of significance for Studio City, because Studio City is listed as only a hillside community. Studio City's boundaries are: (from the SCNC Bylaws)

NORTH: Coldwater Canyon Boulevard where it intersects US-101 (Ventura Freeway); Ventura Freeway; US-101 / CA-134 / CA-170 freeway interchange.
EAST: US-101 / CA-134 / CA-170 freeway interchange; US-101 (Hollywood Freeway); Vineland Avenue; Whipple Street; Lankershim Boulevard to Fredonia Drive (excluding the two-acre parcel on the west side of Lankershim owned by Universal Studios, described as Lots 1, 2 and 3 of Tract 25507 and portion of lot 279 of Lankershim Ranch and Water Company, also know as the "Hotel / Post Office parcel"); the border between zip codes 91604 and 90068; border between zip codes 91604 and 90068 where it intersects Mulholland Drive (just west of Torryson Place at approximately 7700 Mulholland Drive).
SOUTH: Border between zip codes 91604 and 90068 where it intersects Mulholland Drive (just west of Torryson Place at approximately 7700 Mulholland Drive); Mulholland Drive; intersection of Mulholland Drive and Split Rock Road.
WEST: Intersection of Mulholland Drive and Split Rock Road; sightline to the southern terminus of Longridge Avenue; Longridge Avenue; (all following descriptions are the border between zip codes 91604 and 91423 until it reaches the intersection of Kling Street and Coldwater Canyon Boulevard) Ventura Boulevard; Fulton Avenue; Valleyheart Drive north of the Los Angeles River; Ethyl Avenue; Sarah Street; Van Noord Avenue; Kling Street; Coldwater Canyon Boulevard; Coldwater Canyon Boulevard where it intersects US-101 (Ventura Freeway).

The errors and omissions related to Studio City were outlined in the responses from the SCNC, Studio City stakeholders, including myself, during the Metro DEIR process. I am disappointed that these changes were not made in the Evolution DEIR. Many of the documents provided by the Evolution DEIR are outdated and need to be updated. The city is currently rationing water, brown outs have occurred at times and schools are no longer year round, to name a few.

The current DEIR puts all of the services required by a residential community to be placed in the City of Los Angeles at a time when the current residents are receiving little to no services. All of the southeast valley schools are filled over capacity. The current residents are being bombarded with increasing fees but streets, sewer capacity, water, power and all other services are being reduced. The infrastructure of the southeast valley cannot absorb any further development without a restructuring and improvement to the infrastructure. The current capacity of the 101, 134 and 170 freeways and Lankershim Blvd, Ventura Blvd, Cahuenga Blvd. and Barham Blvd. must be improved if the proposed Metro and/or Evolution developments are to go forward in any form.

How do the southeast valley communities absorb any more density with the currently proposed mititations? What types of jobs are really being proposed? Where are the community safeguards and involvement in the decisions? When are the current residents considered in the project compliance? How can unavoidable impacts be reduced to a level of insignificance, instead of being proposed at all?

I request that a combined EIR is for both the Metro/Universal Project and the NBC

Universal Evolution Plan be required for these two developments and that no shared mitigations be considered.

PROPOSED NBC UNIVERSAL EVOLUTION PLAN
COMMENTS and QUESTIONS
By Barbara Monahan Burke January 11, 2011

There must be recognition of the vast cumulative negative impact on the surrounding communities the proposed NBC Universal Evolution Plan (Evolution) in combination with the proposed adjacent Metro Project (Metro). Nothing will be able to mitigate the destructive impacts these projects will have on the scale, character and the quality of life in our community, Studio City.

This report will deal with the impacts on LADWP water and electrical usage, as well a waste sanitation, with a few other items brought up in these sections.

We, the Los Angeles ratepayers, are always asked to CONSERVE water and energy and create GREEN scenarios as best we can. In fact, the residents over the past quarter century have succeeded far better at conservation than commercial and industrial businesses overall. Yet, here we have a so-called inevitable giant project on a modest parcel that until now has coexisted with the surrounding predominantly R1-1 residences. The proposed increased density is unacceptable for our San Fernando Valley suburban area. We are not urban downtown and do not aspire to become "Times Square West."

In addition, there is a proposal for not only a jail but also a prison surrounded by existing R1-1 residential and modest commercial areas. This is absolutely inappropriate and even dangerous to our community that works so hard to try to achieve safety for our neighborhoods.

Open-space living, especially along the proposed green spaces by the Los Angeles River, is essential for our residents and workers. We need a broad space-allotment on both sides of the Los Angeles River to provide walking trails, bikeways for recreation and travel for work including spots for enjoying nature. It is wasteful of our PUBLIC OPEN SPACE to claim only a 12-foot right-of-way is there for active or passive activities beyond the concrete walls of the current channel – that beyond being proposed as available for a planned roadway and conduit for the LADWP projects. Again, inappropriate and unacceptable.

The terms of the LADWP agreement refer to both 30 and 50 year time frames for the city water usage and the county water usage respectively. Why is it different? 30 years appears more frequently for the city than the 50 years for the county. Both terms of agreements (with the city and the county) should be the same. The county claims better terms, but both should be in perpetuity. As it is, the other ratepayers will eventually have to put up with higher rates for, again, lesser usage by them. The water and power rates will skyrocket anyway as the adjoining areas' density increases dramatically (in our eyes for the worse) with the unmitigated affects of the proposed development dropped into the midst of Studio City without consideration for those who already live and work in the area.

In the 1955's agreement, potable water could be recycled but not reclaimed. Now, without essential transparency to our stakeholders, the LADWP "recycled" water is defined as "recycled" as well as "reclaimed" water. Only true "recycled" water should be allowed as "potable" water alongside natural spring water, natural aquifer water. Clean up the San Fernando Valley Aquifer and use it as natural water – do not put sludge over it and call the resulting water "recycled," it would be "reclaimed" with all the involved chemicals added to and within the original sewage, nothing natural about it.

The charts for proposed water usage, in all instances industrial waste permits should be mandatory for the industries.

We already have police DUI stops at Ventura Boulevard by Lankershim Boulevard and at Laurel Canyon by Ventura Boulevard because of excessive alcohol and drug use of drivers in Studio City. The last thing we need are more bars.

Shocked is the only work that comes to mind to describe the feeling when I read of the proposed shooting range. With increased above-ground gang activity in Studio City and an increase in area murders, it is disturbing to see "shooting" proposed. Inappropriate and unacceptable.

The turf for the Lakeside Golf Course should be handled organically, both for handling pests and fertilizing. It is possible, and it is essential given Evolution's proximity to the Los Angeles River. We all work to honor the Los Angeles River, the intent of the Los Angeles River Improvement District, and this developer should, too.

In specifying irrigation schedules, the LADWP should urge watering in the morning. Evening water allows pests and diseases to thrive.

Surplus Water Supply

Page 5 of 15 #2.2.1 – Leaving the final decision to the LADWP Board of Commissioners is unacceptable. The courts should be able to override any decision by the politically appointed Board of Commissioners.

Page 1 – "Current flow levels" by the Bureau of Sanitation within Studio City are already beyond recommended capacity now as evidenced by the now permanent scrubber located on Radford Street.

The Hyperion Treatment Plant proposed enlargement is unacceptable. With the ensuing loss of open space for the southeast valley, Studio City stakeholders have let officials know at numerous meetings that the little open space we have left must be preserved.

Page 2.6 – Default – 24 months is too long for water to not be delivered.

California law requires this proposed project's assessment before the DEIR presentation. 4.3 allows the LADWP to provide "recycled" (read recycled/reclaimed) water to Evolution as asked. It should be "potable" unless true recycled without chemicals (not reclaimed) is to be used for irrigation.

There shall be maximum energy efficiency per Title 24 – clean, efficient and renewable. CONSERVATION shall be the first priority for all ratepayers; the Sierra Club agrees. The LADWP should emphasize this.

Use permeable materials wherever possible to maximize infiltration of ground water.

The combination of trees, water and air working together creates a balance, a healthy environment dependent on each part. Our open space situation is healthful for us and other creatures, must be created. Evolution will bring density and disproportionate building at the expense of the trees, water and air and other living occupants of the area.

The practice of releasing hotter air from inside to outside might help the energy usage of proposed project building, but that in turn heats up the outside air not only for the project area but also for areas in the general vicinity of the project. That negatively affects our adjacent community directly, Studio City, forever.

Page 7 – Okays shall be by the city, not (as suggested) by the project personnel. This demands transparency.

Page 16 – Safety and security are essential. Once that thresh-hold is reached, no extra light shall be used because that is unhealthy for plants as well as people.

We decry the waste of energy Sign Districts would need, as well as the loss of "darkness."

Increase penalties for delay in water replacement.

With increased use of on-site water infiltration, storm drainage should decrease dramatically. Supervisor Zev Yaroslavsky is a proponent of on-site infiltration.

Finally, always replace annual water supplies with naturally achieved potable water, not reclaimed.

Transportation Comments & Questions from Todd Royal

RE: DEIR Case Number:
ENV-2007-0254-EIR

Section One: Overall Comments and Questions

1. The project's timeline for completion is 20 years - is that a best-case scenario or are there issues that could cause this project to take longer to build? What is the project takes longer; what additional transportation mitigation measures would then take place?
2. Is the City of Burbank and City of West Hollywood under any legal or moral obligation to do all or any of the recommended mitigation measures?
3. What happens to the 101 freeway if Caltrans does not complete all of the recommended mitigation measures? Where does the State of California get the money to complete all recommended construction? How long will it take for the construction to be completed if the State of California only partially comes up with the ONE HUNDRED MILLION DOLLARS that is being projected to complete all 101-freeway construction? Is there anything in Caltrans's current or future budget to construct everything that needs to take place to the 101-freeway for all mitigation measures?
4. Since this project is being touted as a Transportation Oriented Development (TOD) does the heavier use of the Red Line significantly influence the already 250 million dollar operating deficit the Metro is currently experiencing. When does the Metro believe it will no longer be operating at a loss? Who covers the greater use of the Red Line costs -- the more the Red Line, Light Rail, Bus Rapid Transit (BRT) or other forms of Metro's public transportation are put into use the more the Metro and ultimately the taxpayer lose money. My question is, if this project touts the additional usage of the Red Line will NBC Universal, Comcast or whatever entity owns the development cover the additional expense of the Red Line?
5. What is the maximum daily capacity of the Red Line? Can additional cars be added to it and if so, who pays for that cost? Can adding additional tunnels or light rail to handle additional riders expand the Red Line and if so, who covers those costs?
6. How many riders are projected for the Red Line each year during construction and when the project is completed. This would projected ridership for all phases of construction. Are construction workers included in these numbers?
7. What specifically is Universal going to do to make employees and guests use the Red Line, buses, Carpools, Vanpools, Telecommuting or other forms of mitigation measures specifically mentioned in the DEIR to get people out of their cars. What are the incentives to make people get off congested roads and the 101 freeway?
8. Who oversees and enforces all traffic mitigations? What happens if they are not completed? What is the time-frame for completion?

9. In Studio City there is currently either proposed or under construction the Colfax Bridge, LA DWP Trunk Line Replacement Projects(s) and the Equinox Gym on Ventura Boulevard which will and are greatly affecting vehicular and pedestrian mobility - have any of these projects been factored into traffic counts or mitigation measures?

End General Comments and Questions.

Section Two: Page Number(s) Comments and Questions from the DEIR

- Page 54 P#1: When the term "unavoidable or significant impacts" are mentioned who then pays the cost to correct that problem? Is it the taxpayer? Is it Universal or a combination thereof? If the taxpayer then does the taxpayer receive any type of financial incentive such as a dividend check from NBC Universal if they are within 5 miles of the project? Will the City of Los Angeles out of the General Fund have to make all necessary traffic mitigation measures? What happens if the City of Los Angeles declares bankruptcy do those contracts related to traffic mitigation become invalid?

- Page 54 P#2: With furloughs and layoffs significantly impacting the Los Angeles Department of Transportation (LADOT) where do they get the resources and manpower to ensure all traffic mitigation measures before, during and after construction are completed?

- Page 58 (A): Sharing of Mitigation Measures - if mitigation measures are shared then why are there two separate DEIR's?

- Page 67 Mitigation B-22: Does Caltrans have the money in their budget currently or in the future to determine if a signal is required? Do either Caltrans or LADOT have the money and resources to study the proposed traffic signal study?

- Page 68 Mitigation B-27, B-28, B-29, B-30, B-31, B-33, B-34, B-35, B-36, B-37 and B-38: What if the City of Burbank does not have the money in their current or future budgets to implement the above mitigations? What if the City of Burbank refuses to have their Traffic Signal Interconnect and Signal Timing System and their Citywide Signal Control System interfaced with this proposed project.

- Page 73 (E): What alternate routes are being suggested for motorists? It's not said in the DEIR of any specific routes. Hollywood is a world-renowned tourist destination and drivers could use specific routes and direction to popular destinations within the Hollywood Event Management Infrastructure. This specificity would cut down on vehicular congestion,

smog, increase air quality and reduce carbon emissions that lead to Global Warming.

- Page 74 Mitigation B-40: Who enforces construction workers not parking in adjacent neighborhoods like Studio City?

- Page 74-75 Mitigation B-41: Who enforces no construction traffic of any kind does not go into residential streets and the continued enforcement of no construction traffic or hauling not taking place on Ventura Boulevard? The Ventura Boulevard Cahuenga Specific Plan prohibits construction hauling and truck traffic.

- Page 45: Please explain the words, "substantial inconvenience to auto travelers?"

- Page 46: What study or criteria are used for projecting traffic to the year 2030?

- Page 47: Half of the 148 signalized study intersection would be significantly impacted - does this include the City of Burbank?

- Page 48: Under the section TRANSIT ANALYSIS who pays for the additional transit trips if the Metro already operates at a 250-275 million dollar loss?

- Page 50: Construction; why are there 2 DEIR's and not one if the projects occur at the same time?

- Page 50: Where does the City of Los Angeles and Caltrans get the money for additional roadway improvements?

- Page 52 Neighborhood Intrusion and Project Access: Why is it acceptable to the City of Los Angeles to have significant and unavoidable intrusions into Studio City neighborhoods?

- Page 53 Supplemental Caltrans Analysis: This could result in significant cumulative impacts at the analyzed freeway segments - will Caltrans contribute the money and time for construction to alleviate these problems?

- Page 54: Why would LADOT and the City of Los Angeles allow significant impact or impacts to remain?

- Page 58 (A) iii Mitigation Measures (Sharing of them with Metro Project): Who exactly does what traffic mitigation measures if they are shared? The DEIR does not state the specifics.

- Page 71 Mitigation Measure B-39: What is the traffic threshold to warrant a new signal? Why won't it be installed now if there will be a significant project impact until one is installed?

- Page 73: What is the Hollywood Event Management Infrastructure?

- Page 77 Weaving: What constitutes a "fair share contribution?"

- Page 84: Why is it acceptable to have 6 freeway segments on the 101 South Freeway and 170 be left with significant impacts? Who pays to alleviate that additional freeway congestion because of this project?

- Page 255: Why is it acceptable to be left with significant and unavoidable impacts?

- Page 257 (2) Operations (i) Roadway Intersection: Intersections 22, 23, 29, 30, 33, 35, 36, 73, 82 - if the City of Los Angeles permit process can't be completed then a significant impact or impacts remain then why is the project allowed to go forward? With AB 32 The Global Warming Solutions Act this means not only will traffic be worse but noise, air quality, solid waste and off-site mitigation measures also grow worse and under AB 32 this is against the law.

- Page 259 (v) Supplemental Caltrans Analysis: Where does Caltrans get the money for their part(s) of the mitigation measures?

End Section Two Specific Comments and Questions

Section Three: Appendix E-2 LADOT Assessment Letter

- Page 3 (C). Traffic Oriented Development (TOD): How does a project that produces over 36,000 vehicles trips a day promote TOD and conform to AB 32?

- Page 5 Part II. Project Transportation Mitigation Program: "no feasible mitigation measures were identified," why is that phrase acceptable under CEQA and AB 32?

- Page 5 (A): What specific, "inherent incentives" are being provided for employees, visitors and tenants?

- Page 6: Will the TDM Program include everything listed? Especially GUARANTEED ride home program and IRS Code 132(f) for pre-tax dollar transit commute expense accounts?

- Page 12: What happened to an East-West road as originally proposed?

- Page 28 Conclusions: Eight unmitigated traffic impacts are mentioned; why is that acceptable?

Lisa:

I have some thoughts on Universal.

I know your team is spending tons of time dealing with notes and commentary on the EIR.

But I was thinking that we should also be taking a longer term view of the Universal project. As you know every 10 or so years they come up with a revision. The billion dollar price tag is a business and economic decision for the company that keeps getting bought and sold.

I think we need to see if anyone can tell us what this project does to the "bottom line"

I would also volunteer to organize another sub group to collect information. I am thinking that SC needs to think in "big terms" what it is that we want to preserve
1. Green space
2. Traffic circulation
3. Specific "do-able" quality of life issues.. that we can name

Then we need to see if for example they will give us a greenbelt that is permanent. Maybe they can create a non-profit to hold the golf course.. Yes I am talking big thinking. What do we want protected?

Then I think a listening tour should have some contact with Burbank which is another town over run with show biz.. maybe Anaheim adjacent to Disneyland.. to find out the good, the bad and the better ideas based on experience.

My census stats show that locals communte.. not what we expected... that taints the use local talent... we need to expect traffic....

I also think we need to talk with businesses... they will allocate areas for shops that will make out Village area a Dead Zone

Would be more accepting if there was a tax credit for hiring with X miles for the employee... or the employer... They think big, hoping to have the city absorb all the infra structure expenses...AND they have the 800 gorilla power to change city and county lines, so this stuff that we come up with may be a real possibility.

We should be looking at a position of how to make this work for us... I think we know that some of it will come to fruition.. what can we do to make it work for us...??

Another point---Equinox s gone from our radar.. but I am betting that the new owner is not gone from Kerkorian's radar.. what is he asking around for???

I know we'll have a busy agenda and don't want to side track you from the immediate task at hand. Joann

SCNC BOARD

Jeffrey Carter
Ben Di Benedetto
Josh Gelfat
Victor Helo
Wayne Kartin
Remy Kessler
Ben Neumann
Richard Niederberg
Todd Royal
Lisa Sarkin
Lana Shackelford
Gail Steinberg
Ron Taylor
Rita C. Villa
John T. Walker

STUDIO CITY NEIGHBORHOOD COUNCIL

CBS Studio Center
4024 Radford, Studio City CA, 91604

PRESIDENT
John T. Walker
VICE PRESIDENT
Todd Royal
TREASURER
Remy Kessler
SECRETARY
Rita C. Villa
CORRESPONDING SECRETARY
Lana Shackelford

4024 Radford Ave.
Edit. Bldg. 2, Suite 6
Studio City, CA 91604
tel. (818) 655-5400
www.scnc.info

STAKEHOLDER COMMENTS & QUESTIONS

NBC UNIVERSAL EVOLUTION PLAN

Name:___Yuval Ron
Address: 12400 Ventura blvd suite 1025 studio city ca 91604

May we use it? no

Email Address:_yuval@yuvalronmusic.com

The comments and questions will be submitted to the City Planning Department and be included in the SCNC response to the Draft Environmental Impact Report:

We strongly object for proposed NBC Universal Evolution Plan as it may result in 36,000 additional car trips into the Studio City area with little to no traffic mitigations. Together, with the 2,937 unit residential district on the back lot this plan would lower the quality of life in Studio City, will lower the value of our property, will increase the pollution and strain on the natural environment and infrastructure of Studio City. PELASE STOP THIS AND ANY OTHER LARGE DEVELOPMENTS in Studio City. WE, the residents, the people who vote, do NOT want these developments in our little Studio City.
Please listen!

Date: Wednesday, January 26, 2011 2:43 PM

From: dfrady@roadrunner.com

To: hippolady@roadrunner.com

Subject: Re: NBC Universal Evolution Plan

Our comment is simple. There is too much traffic and the variances that the City Council always gives to the builders just makes a bigger mess.

--
Carol or Dennis Frady

---- hippolady@roadrunner.com wrote:
> Dear Neighbors -
>
> I'm sure you have heard about the proposed NBC Universal Evolution Plan and it 20 year construction window. It proposes to bring more than 36,000 car trips into the Studio
> City area with little to no traffic mitigations. Also, proposed is a 2,937 unit residential
> district on the backlot which will be entirely within the limits of the City of Los Angeles.
> The city will be responsible for all services and infrastructure.
>
> If you want to learn more, please go to www.scnc.info and clink on the Draft Environmental
> Impact Report link.
>
> Attached is a comment form which must be submitted by February 4, 2011. Please write any
> question you would like answered by the developer and email it to me or fax it to (818) 980-1011.
>
> This is just the first process. Public hearings will begin after the Final Environmental
> Impact Report is published.
>
> Thank you for your support. Lisa

Copyright © 2011 Road Runner HoldCo. LLC | Advertise with Us | Web Privacy Policy | Privacy Policy | Sign Up for Road Runner

Date: Wednesday, January 26, 2011 10:40 PM

From: John A. Mozzer <jamworks@earthlink.net>

To: sczo@roadrunner.com

Subject: Re: NBC Universal Evolution Plan

I wonder what Comcast thinks about it.

http://www.engadget.com/2011/01/18/fcc-approves-comcasts-purchase-of-nbc-justice-department-up-ne/

-----Original Message-----
>From: sczo@roadrunner.com
>Sent: Jan 26, 2011 2:37 PM
>To: sczo@roadrunner.com
>Subject: NBC Universal Evolution Plan
>
>Dear Neighbors -
>
>I'm sure you have heard about the proposed NBC Universal Evolution Plan and it 20 year construction window. It proposes to bring more than 36,000 car trips into the Studio
>City area with little to no traffic mitigations. Also, proposed is a 2,937 unit residential
>district on the backlot which will be entirely within the limits of the City of Los Angeles.
>The city will be responsible for all services and infrastructure.
>
>If you want to learn more, please go to www.scnc.info and clink on the Draft Environmental
>Impact Report link.
>
>Attached is a comment form which must be submitted by February 4, 2011. Please write any
>question you would like answered by the developer and email it to me or fax it to (818) 980-1011.
>
>This is just the first process. Public hearings will begin after the Final Environmental
>Impact Report is published.
>
>Thank you for your support. Lisa

Copyright © 2011 Road Runner HoldCo. LLC | Advertise with Us | Web Privacy Policy | Privacy Policy | Sign Up for Road Runner

SCNC BOARD

Jeffrey Carter
Ben Di Benedetto
Josh Gelfat
Victor Helo
Wayne Kartin
Remy Kessler
Ben Neumann
Richard Niederberg
Todd Royal
Lisa Sarkin
Lana Shackelford
Gail Steinberg
Ron Taylor
Rita C. Villa
John T. Walker

STUDIO CITY NEIGHBORHOOD COUNCIL

CBS Studio Center
4024 Radford, Studio City CA, 91604

PRESIDENT
John T. Walker
VICE PRESIDENT
Todd Royal
TREASURER
Remy Kessler
SECRETARY
Rita C. Villa
CORRESPONDING SECRETARY
Lana Shackelford

4024 Radford Ave.
Edit. Bldg. 2, Suite 6
Studio City, CA 91604
tel. (818) 655-5400
www.scnc.info

STAKEHOLDER COMMENTS & QUESTIONS

NBC UNIVERSAL EVOLUTION PLAN

Name: Toby and Cindy Northcote-Smith
Address: 4078 Kraft Ave, Studio City, CA 91604
May we use it? Yes
Email Address: Tobyns@sbcglobal.net

The comments and questions will be submitted to the City Planning Department and be included in the SCNC response to the Draft Environmental Impact Report:

Both my wife and I are opposed to the expansion of universal.

Our prime concerns are:

1. Increased congestion. Our roads are already too busy. Particularly Ventura Blvd. Laurel Canyon ect.
2. Stress on local infrastructure and shops. Trader Joes couldn't be any busier as it is.
3. Increased crime. There has been an increase in crime over the past few years. We believe this is as a result of the increased population density as a result of condo/apartment
4. Degraded Education. Our schools are already reaching capacity. LAUSD is at breaking point. The extra curriculum services that the parents organizations will struggle to maintain the current levels of support that keep property values and studio city what it is.

SCNC BOARD

Jeffrey Carter
Ben Di Benedetto
Josh Gelfat
Victor Helo
Wayne Kartin
Remy Kessler
Ben Neumann
Richard Niederberg
Todd Royal
Lisa Sarkin
Lana Shackelford
Gail Steinberg
Ron Taylor
Rita C. Villa
John T. Walker

STUDIO CITY NEIGHBORHOOD COUNCIL

CBS Studio Center
4024 Radford Ave.
Edit. Bldg. 2, Suite 6
Studio City CA, 91604

PRESIDENT
John T. Walker
VICE PRESIDENT
Todd Royal
TREASURER
Remy Kessler
SECRETARY
Rita C. Villa
CORRESPONDING SECRETARY
Lana Shackelford
SCNC Office:
(818) 655-5400
www.scnc.info

STAKEHOLDER COMMENTS & QUESTIONS

NBC UNIVERSAL EVOLUTION PLAN

Name: LANA FORD

Address: 4377 Colfax Ave #23

Email Address: lana@lanaford.com May we use it? yes

The comments and questions to be submitted to the City Planning Department and be included in the SCNC response to the Draft Environmental Impact Report:

① What is the forecast from Universal NBC/Comcast for the company's workforce growth during this time of development?

② What are the responses/recommendations from their corporate Neighbors — Disney/ABC + Warner Bros. ? And for that matter — CBS needs to be included as a Studio City Corporate Player in this too.

SCNC BOARD

Jeffrey Carter
Ben Di Benedetto
Josh Gelfat
Victor Helo
Wayne Kartin
Remy Kessler
Ben Neumann
Richard Niederberg
Todd Royal
Lisa Sarkin
Lana Shackelford
Gail Steinberg
Ron Taylor
Rita C. Villa
John T. Walker

STUDIO CITY NEIGHBORHOOD COUNCIL

CBS Studio Center
4024 Radford Ave.
Edit. Bldg. 2, Suite 6
Studio City CA, 91604

PRESIDENT
John T. Walker
VICE PRESIDENT
Todd Royal
TREASURER
Remy Kessler
SECRETARY
Rita C. Villa
CORRESPONDING SECRETARY
Lana Shackelford
SCNC Office:
(818) 655-5400
www.scnc.info

STAKEHOLDER COMMENTS & QUESTIONS

NBC UNIVERSAL EVOLUTION PLAN

Name: LANA FORD

Address: 4377 Colfax Ave #23

Email Address: lana@lanaford.com May we use it? Yes

The comments and questions to be submitted to the City Planning Department and be included in the SCNC response to the Draft Environmental Impact Report:

Has there been any contact with the Tree People Association to join forces with lobbying for saving the Heritage Trees?

SCNC Board

Jeffrey Carter
Ben Di Benedetto
Josh Gelfat
Victor Helo
Wayne Kartin
Remy Kessler
Ben Neumann
Richard Niederberg
Todd Royal
Lisa Sarkin
Lana Shackelford
Gail Steinberg
Ron Taylor
Rita C. Villa
John T. Walker

CBS Studio Center
4024 Radford, Studio City CA, 91604

President
John T. Walker
Vice President
Todd Royal
Treasurer
Remy Kessler
Secretary
Rita C. Villa
Corresponding Secretary
Lana Shackelford

4024 Radford Ave.
Edit. Bldg. 2, Suite 6
Studio City, CA 91604
tel. (818) 655-5400
www.scnc.info

STAKEHOLDER COMMENTS & QUESTIONS

NBC UNIVERSAL EVOLUTION PLAN

Name:John and Linda Mattingly

Address:11565 Dilling St Studio City 91604

Yes

May we use it?

Email Address:lcmattingly@earthlink.net

The comments and questions will be submitted to the City Planning Department and be included in the SCNC response to the Draft Environmental Impact Report:

We are fully supportive of the Universal development. Thank you.

From: gsilver4@sbcglobal.net
Subject: NBC/Universal Evolution Plan - ENV-2007-0254-EIR,
Date: Tue, January 18, 2011 11:06 am
To: "Zev Yaroslavsky" <Zyaroslavsky@lacbos.org>,jon.foreman@lacity.org
Cc: "Tom LaBonge" <councilmember.labonge@lacity.org>,"Jennifer Driver" <jennifer.driver@lacity.org>,"Priya Mehendale" <priya.mehendale@lacity.org>,"Karo Torossian" <karo.torossian@lacity.org>,"Jeffrey Ebenstein" <jeffrey.ebenstein@lacity.org>,"Shawn Bayliss" <shawn.bayliss@lacity.org>,"Thomas Glick" <tom.glick@lacity.org>

HOME **Homeowners of Encino**

♦ Serving the Homeowners of Encino ♦

GERALD A. SILVER
President
PO BOX 260205
ENCINO, CA 91426
Phone (818)990-2757

January 18, 2011

Jon Foreman – Senior City Planner
Los Angeles City Planning Department
200 N. Spring St. Room 601
Los Angeles, CA 90012
jon.foreman@lacity.org

Case No. ENV-2007-0254-EIR, Clearinghouse Number:2007071036

Project Location: 100 Universal City Plaza, Universal City, CA 91608

Proposed Project: The NBC Universal Evolution Plan (the "Project") includes the development of a 391-acre site in the east San Fernando Valley near the Cahuenga Pass (the "Project Site"). The Project, as proposed, would involve a net increase of 2.01 million square feet of new commercial development, including 500 hotel guest rooms and related hotel facilities. A total of 2,937 dwelling units would be developed. Implementation would occur pursuant to the development standards set forth in two proposed Specific Plans. The proposed Universal City Specific Plan addresses development within the portion of the Project Site located within the City of Los Angeles, whereas the proposed Universal Studios Specific Plan addresses development within the portion of the Project Site located under the jurisdiction of the County of Los Angeles. Portions of the Project Site that are currently in the County of Los Angeles would be annexed into the City of Los Angeles, while other areas would be detached from the City of Los Angeles and returned to the jurisdiction of the County of Los Angeles. The proposed annexation/detachment reflects the Applicant's objective to establish jurisdictional boundaries that follow existing and planned on-site land use patterns.

We object to the traffic, noise, congestion, infrastructure damage and pollution that the 2.01 million square feet of new commercial development including 500 hotel guest rooms and 2,937 dwelling units will bring to the San Fernando Valley, and the entire region. This massive amount of new development simply cannot be sustained by the existing infrastructure, regardless of the meager "mitigations" that are proposed.

We ask that the City and County reject the draft EIR for this project. The draft EIR prepared by Matrix Environmental is "authoritative" looking on the surface, but is grossly inadequate and fails in its findings. The draft EIR is devoid of meaningful mitigation measures and contains many flawed conclusions. The lengthy document obfuscates traffic, congestion and

infrastructure problems while going on at length about tangential matters and ignores mitigation measures that are required by CEQA. Throughout the draft EIR the preparer reaches faulty conclusions claiming impacts are reduced to "less than significant" when in reality the impacts are significant.

We ask that the City and County not approve any discretionary approvals, including annexation changes, zone changes, height district changes, vesting zone changes, general plan amendments, specific plan amendments, variances, exceptions or conditional use permits for this project. The project will create environmental problems that cannot be mitigated. We ask that you deny the applicant's requests described below:

We oppose the adoption of a Specific Plan to regulate development within the City portions of the Project Site; General Plan Amendment to Regional Commercial land use designation for the City portions of the Project Site; the removal of a small portion of the Project Site from the Mulholland Scenic Parkway Specific Plan; Zone Change and Code Amendment to effectuate the new Specific Plan; Tentative Tract Maps for mixed-use development (including residential condominiums with accompanying Development Design Guidelines); Development Agreement; Pre-Annexation Agreement; Haul Route Permit(s); Grading approvals; establishment of Community Facilities/Mello-Roos Districts and any additional actions that may be determined necessary.

We oppose the Applicant's request for the following discretionary approvals from the County of Los Angeles for those portions of the Project Site that are located within the unincorporated portions of Los Angeles County: adoption of a Specific Plan to regulate development within the County portions of the Project Site; General Plan Amendments to establish a Specific Plan land use designation, delete an on-site road designation (the "East-West Road") as set forth in the County's General Plan Circulation Element and amend the Urban Form Policy Map to change the project site designation; Zone Change to effectuate the new Specific Plan; Tentative Tract Map; Grading Approvals; Development Agreement; and any additional actions that may be determined necessary.

We oppose the Applicant's request for modification to the City and County jurisdictional boundaries through a Petition for Reorganization application with the Local Agency Formation Commission (LAFCO) and an amendment to the City's sphere of influence.

Our members strongly oppose granting any annexations, zone changes, height district changes, vesting zone changes, general plan amendments, specific plan amendments, variances, exceptions or conditional use permits for this project. We ask that you deny the applicant's requests, based in part upon the following facts:

1. The proposed location will not be desirable to the public convenience or welfare and is not proper in relation to adjacent uses and development of the east San Fernando Valley. The object here is to determine what is harmonious with the neighborhood and community, not what will maximize the Applicant's profits.

2. The uses will be materially detrimental to the character of the development in the immediate neighborhood, and other projects in the east San Fernando Valley. This project is totally out of scale with the adjacent community. The local roadway and circulation system cannot handle this massive increase in housing and commercial development.

3. The proposed location will not be in harmony with the various elements and objectives of the existing community plans. Exceptions, zone changes and variances are not needed to build on this property. Rather, this is a situation where the Applicant simply wants exceptions to the rules, to make this project more valuable, at a cost to the community.

Benefits to this Applicant should not be the major determinant. Rather, the focus should be on this project's impact on the neighborhoods. Moreover, the Applicant was aware of all restrictions on this property when he purchased the property. He can build and use his property rights without the exceptions requested.

4. The project's location will adversely affect the traffic in the east San Fernando Valley and result in increased congestion. The proposed use will detrimentally impact traffic on the Hollywood Freeway, Barham Blvd., Cahuenga Pass and the surrounding street grid, an area already heavily congested. Adding thousands of new trips will make traffic even more unbearable throughout the day and evening. This section of the east Valley has many F level intersections and cannot handle increased trips.

5. Granting any of the Applicant's requests will have severe negative impacts on local residents, and others living in the San Fernando Valley. It would allow a massive amount of commercial and residential development that cannot be sustained by the local infrastructure.

On behalf of our members, and the thousands of San Fernando Valley residents that are daily impacted by noise, traffic and congestion, we ask that you not approve the discretionary actions that are requested.

Cordially yours,

Gerald A. Silver

Gerald A. Silver, President

Attachments:

untitled-[1.1]	
Size:	7.7 k
Type:	text/plain

clip_image002.jpg	
Size:	12 k
Type:	application/octet-stream

clip_image004.jpg	
Size:	4.9 k
Type:	application/octet-stream

Rita C. Villa
Comments on the NBC Universal Evolution Plan
February 2, 2011

My questions and comments will only be related to the 'Summary of Significant and Unavoidable Impacts' and 'Growth Inducing Impacts.'

The Studio City area is impacted by traffic and parking issues. There is minimal traffic circulation within this area. Adding the proposed Project, without mitigating all of the significant and unavoidable impacts will exacerbate the problem.

Studio City is the gateway to the San Fernando Valley and studies show that the 101, 134 and 170 freeways should have had additional lanes added to them since 1994. Direct interchanges to and from each of these freeways should be added. The Project's proposed shared mitigations with the Metro Universal Project will only create even more significant and unavoidable impacts. The Metro Universal Project DEIR included significant and unavoidable impacts in the same locations as the NBC Universal Evolution Plan DEIR shows.

Each of the noted significant and unavoidable impacts is unacceptable to the Studio City community. The project must be reduced in size to eliminate all significant and unavoidable impacts.

Recent development has doubled the number of rental and condo units in Studio City. Between 2005 and 2008, 600 plus units were added to the housing stock. Many of these units are unsold or not rented. There are more available units in Studio City than at any other time.

Studio City has a 'scrubber,' installed on Radford Avenue because of the over burden on the sewer system. We have been told that an additional 'scrubber' will be installed soon. What will the applicant install to improve the infrastructure in the Studio City area? Growth without infrastructure improvements is unacceptable. Additional housing is not needed in the Studio City area, commercial development is needed. Too many of the manufacturing and commercial properties have already been converted to residential use. The loss of revenue generating commercial and manufacturing properties must be stemmed. This proposed Project will not increase sewer capacity or create connections to previously unserved area?

The proposed Project DEIR shows that students will be required to attend schools on the other side of the hill. There is already so much traffic on the streets leading over the hill that this is not feasible solution. Land for schools must be required to be set aside within the Project site. I specifically want to know where the filming currently taking place the back lot will be done in the future.

Court decisions have limited the reliance that can be places on the use of future estimates for growth and traffic. This DEIR relies heavily on the use of estimates many of which have been questioned by the City of Burbank as being understated. These calculations should be revised so that they are more realistic.

1

There are shortages of electricity and water throughout Southern California. Those resources are not endlessly renewable. The Project as proposed would place very heavy demands on resources that already being rationed. The City of Los Angeles should not accept the financial responsibility for the services required for the residential district while giving up the revenue from the commercially zoned portions of the project that will result from the annexation and detachment proposed in the DEIR.

The Southeast Valley is suburban and not urban. This area is not a regional center. The proposed Project must be reduced in size. As proposed it will overtax the infrastructure and will further congest all aspects of the surrounding communities. It will significantly and adversely impact the quality of life in Studio City. The Project as proposed must not be allowed to proceed.

Response to Comment No. 12-385

Appendix JJ contains comments, questions and copies of letters with comments on the Draft EIR. Responses to comments, questions, and letters are responded to below.

Comment Letter No. 12-385A

NBC UNIVERSAL EVOLUTION PLAN

STUDIO CITY STAKEHOLDER COMMENTS & QUESTIONS

Comment No. 12-385A-1

1. Why is the term "population growth" used?

Response to Comment No. 12-385A-1

Section IV.N.1, Employment, Housing, and Population – Employment, of the Draft EIR evaluates the number and character of jobs supported by the Project and the relationship of the Project to the applicable Southern California Association of Governments 2030 employment growth forecasts. Population growth is a descriptive term that is used to describe an increase in population and is a term commonly used in EIRs. For example, CEQA Guidelines Appendix G, XII, Population and Housing, asks "Would the project: (a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?"

Comment No. 12-385A-2

2. Where is the financing coming from for the proposed Project?

Response to Comment No. 12-385A-2

The comment asks about financing of the Project. As such, it is not a comment addressing the environmental analysis in the Draft EIR, but it is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385A-3

3. Why is the Initial Study dated 2007?

Response to Comment No. 12-385A-3

The Initial Study was prepared in 2007, and in July 2007, the City filed and circulated for a 30-day public review period a Notice of Preparation that a Draft EIR would be prepared for the Project and to allow the public to provide input on the scope of the Draft EIR. The Initial Study was also made available for public review at that time, and a public

scoping meeting was held on August 1, 2007. The commenter is also referred to Topical Response No. 1, EIR Process (see Section III.C, Topical Responses, of this Final EIR).

Comment No. 12-385A-4

4. Why does the DEIR have "Vision" and not "Evolution" Plan shown in some areas?

Response to Comment No. 12-385A-4

"Vision Plan" was the Project name used at the time of the filing of the applications for the Project and during the initial planning and analysis of the Project. The Project name has since been changed to "NBC Universal Evolution Plan."

Comment No. 12-385A-5

5. Why would the Metro Universal Project mitigations be shared with the Evolution Plan?

Response to Comment No. 12-385A-5

This commenter is referred to Response to Comment No. 12-14 regarding the potential sharing of mitigation measures.

Comment No. 12-385A-6

6. Why are impacts to Ventura and Cahuenga Boulevards left out of the DEIR?

Response to Comment No. 12-385A-6

Potential impacts to Ventura Boulevard and Cahuenga Boulevard are analyzed in Section IV.B.1, Traffic/Access – Traffic Circulation, of the Draft EIR. As shown in Figures 43A-43C and Table 17 of the Draft EIR, 28 of the analyzed intersections are on Ventura Boulevard, and 28 of the analyzed intersections are on Cahuenga Boulevard.

Comment No. 12-385A-7

7. How will road conditions, caused by the proposed Project construction be repaired?

Response to Comment No. 12-385A-7

Roadway maintenance in the City of Los Angeles and the adjacent cities is primarily handled by each city's Public Works Department as part of their normal activities. Funding for much of the road maintenance comes to the cities through the state as part of the distribution of gas tax monies collected when motorists purchase fuel for their vehicles.

Comment No. 12-385A-8

8. What is being done to eliminate sound issues?

Response to Comment No. 12-385A-8

Please refer to Section IV.C, Noise, of the Draft EIR, for a detailed analysis of the Project's potential noise-related impacts and proposed project design features and mitigation measures that would reduce noise. For the convenience of the reader, the following are the project design feature and mitigation measures from Section IV.C, Noise, of the Draft EIR:

Project Design Feature C-1: The Project shall not utilize pile driving machinery as part of its construction equipment mix.

Mitigation Measure C-1: When Project construction staging occurs within 500 feet of an occupied residential structure that is located outside of the combined boundaries of the Universal Studios Specific Plan and the Universal City Specific Plan, the contractor shall:

1. Locate stationary construction equipment away from the occupied residential structure or install temporary acoustic barriers around stationary construction noise sources; and
2. Shut off construction equipment that is not in use.

Mitigation Measure C-3: When Project construction in the Mixed-Use Residential Area occurs on the southern portion of the proposed grading area as shown in Figure 96 on page 1014:

1. All construction equipment, with the exception of small bulldozers and loading trucks or equivalent construction equipment with a peak particle velocity in the range of 0.003 to 0.076 inch/second, shall operate no closer than 30 feet from the property line adjacent to the Hollywood Manor receptor area.
2. All loading trucks shall operate no closer than 15 feet from the property line.

Mitigation Measure C-4: In the event that during Project construction, there is hauling that results in more than 78 haul trips per hour along Forest Lawn Drive, the Applicant or its successor shall monitor whether if such hauling results in increases of noise greater than 5 decibels above ambient within the Rancho Neighborhood in the City of Burbank. If noise increases generated by the construction hauling along Forest Lawn Drive exceed 5 decibel above ambient, the Applicant or its successor shall implement:

1. The installation of a noise barrier along the north end of Forest Lawn Drive. The barrier shall extend approximately 0.4 mile

along Forest Lawn Drive across from the Rancho Neighborhood. The barrier may consist of plywood panels (fifteen feet in height) and each panel shall overlap each end by 4 inches.

2. The Applicant or its successor shall post notices on the temporary noise barrier adjacent to the north side of Forest Lawn Drive that no unauthorized materials (such as graffiti or posters) may be posted on the temporary barrier and shall visually inspect and remove graffiti and/or unauthorized posters from the temporary barrier within 24 hours, as necessary.

Mitigation Measure C-5: In the event that there are concurrent cumulative hauling activities from the Project and related projects along or adjacent to Forest Lawn Drive that result in 78 haul trips per hour (without the installation of a noise barrier pursuant to Mitigation Measure C-4), or more than 189 haul trips per hour along Forest Lawn Drive (with the noise barrier), the Applicant or its successor shall monitor whether such hauling results in increases of noise greater than 5 decibels above ambient within the Rancho Neighborhood in the City of Burbank. If noise increases generated by the concurrent hauling along Forest Lawn Drive exceeds 5 decibels above ambient, the Applicant or its successor shall install or contribute to the installation of: (a) a sound wall consistent with Mitigation Measure C-4 if one was not previously installed for Project hauling; or (b) a modification to the sound wall in Mitigation Measure C-4, consistent with the recommendation of the noise monitoring report, in order to reduce the noise increase to less than 5 decibels above ambient.

Comment No. 12-385A-9

9. What is being done to eliminate air pollution from idling trucks?

Response to Comment No. 12-385A-9

Section IV.H, Air Quality, of the Draft EIR, provides a detailed analysis of potential Project air impacts. Mitigation Measures H-1 and H-2, Section IV.H, Air Quality, of the Draft EIR, which are restated below for the convenience of the reader, are recommended to reduce emissions from truck and equipment idling time:

Mitigation Measure H-1: The Applicant or its successor shall include in construction contracts the following control measures:

1. Keep all construction equipment in proper tune and maintained in accordance with manufacturer's specifications.

2. All contractors shall operate in compliance with the California Air Resource Board in-use off-road diesel engine rule 183.
3. Limit truck and equipment idling time to 5 minutes or less.
4. Rely on the electricity infrastructure surrounding the construction sites rather than electrical generators powered by internal combustion engines to the extent feasible.
5. Paints and primer used at the Project Site during construction shall comply with applicable South Coast Air Quality Management District Regulation 11 requirements related to the volatile organic compound content in paints and primers.

Mitigation Measure H-2: The Applicant or its successor shall minimize delivery truck idling times to a maximum of five (5) minutes, per the California Air Resources Board's Airborne Toxic Control Measure.

Other project design features and mitigation measures that would limit and control potential air emissions are listed in Section IV.H, Air Quality, of the Draft EIR.

Comment No. 12-385A-10

10. Why are the proposed schools over the hill?

Response to Comment No. 12-385A-10

Impacts related to schools are discussed in Section IV.K.3, Public Services – Schools, of the Draft EIR. The schools evaluated in the Draft EIR are the schools LAUSD identified as serving the Project Site, i.e., Valley View Elementary School, Bancroft Middle School and Hollywood High School as noted on page 1753 of the Draft EIR. The proposed Mixed-Use Residential Area is located within LAUSD local district 4, as is the case with the Hollywood Knolls, Hollywood Manor, and portions of the Cahuenga Pass communities. Valley View Elementary School, Bancroft Middle School, and Hollywood High School are the schools that serve local district 4 and, therefore, now serve students in the general vicinity of the proposed Mixed-Use Residential Area.

The comment also references Appendix V to the comment letter, which includes three maps that appear to designate the location of each of the three schools LAUSD identified as serving the Project Site. As described on pages 1753 and 1755 of the Draft EIR, Valley View Elementary School is located approximately 1.4 miles from the Project Site, Bancroft Middle School is located approximately 4.5 miles from the Project Site, and Hollywood High School is located approximately 4.4 miles from the Project Site. See also Figure 209 on page 1754 of the Draft EIR. The comment is noted and has been incorporated in to the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385A-11

11. What benefit to health and quality of life does this proposed Project give to those already living in Studio City?

Response to Comment No. 12-385A-11

The purpose of the Draft EIR, as set forth in the CEQA Guidelines, is to identify the potential impacts of the proposed Project. An EIR is not required to analyze the potential benefits attributable to a project. Notwithstanding, the Project Objectives contained in Section II, Project Description, of the Draft EIR describe the benefits desired to be achieved by the Project. Such objectives include, but are not limited to, the following: Maximize Opportunities for the Local and Regional Economy, Provide Certainty for Future Development, and Recognize Relationships with Neighbors. These benefits would extend to neighboring communities, as well as the greater Los Angeles Region.

Quality of life is a term that is not defined in CEQA. If, by "quality of life" the commenter means "personal satisfaction (or dissatisfaction) with the cultural or intellectual conditions under which [one]/live[s] (as distinct from material comfort),"[32] quality of life is not an environmental topic addressed under CEQA. Environmental issues set forth under DEQA (e.g., traffic, land use, air quality, etc.) are addressed throughout the Draft EIR analyzes all of the potential environmental impacts of the Project. Project design features and mitigation measures are required which reduce the Project's significant environmental impacts to the extent feasible, thus addressing related quality of life concerns. For additional information regarding the CEQA process, refer to Topical Response No. 1: EIR Process (see Section III.C, Topical Responses, of this Final EIR).

Comment No. 12-385A-12

12. What will be done to control HAZMAT?

Response to Comment No. 12-385A-12

Beginning on page 1978 of Section IV.M, Environmental Safety, and detailed in Appendix O, Environmental Safety Report, the Draft EIR and technical report describes hazardous waste management at the Project Site. The analysis of on-site hazardous materials assumes that the utilization of such materials would continue and potentially

[32] *Website http://dictionary.reference.com/browse/quality+of+life?s=t.*

increase under the proposed Project. Existing hazardous materials and hazardous waste programs currently in place on the Project Site are assumed to continue under the proposed Project. Management practices with regard to hazardous materials include the inventorying of hazardous materials and their storage, risk planning, employee training, and emergency response preparedness should a hazardous materials accident occur. Hazardous materials management is regulated through a wide array of federal, state and local regulations.

As detailed beginning on page 2013 of the Draft EIR, in addition to compliance with all applicable laws, rules and regulations (also known as plans, programs and policies) associated with hazardous materials management, Project design, construction, and operations would occur in accordance with Project Design Features detailed in Section IV.M, Environmental Safety, of the Draft EIR. For example, the Applicant's current comprehensive policies and programs specifically related to hazardous materials and waste management would continue to be implemented. As is currently the Applicant's practice, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all applicable Federal, State and local requirements. Monitoring of the Applicant's hazardous materials management would be conducted by the County Fire Department, the Los Angeles Fire Department, and other applicable regulatory authorities, as appropriate. Likewise, the disposal of on-site generated hazardous waste would occur in accordance with all applicable regulations. In addition, existing design and construction requirements and management practices related to asbestos, asbestos-containing material, or lead-based paint would continue at the Project Site in accordance with applicable Federal, State, and local regulations. The use of only non-polychlorinated biphenyl containing electrical equipment in all new and replacement construction would continue at the Project Site. Therefore, with compliance with the Applicant's Project Design Features, as well as existing regulations and plans at the Project Site, and implementation of mitigation specific to environmental safety (described in the Draft EIR beginning on page 2023), potential hazardous materials and environmental safety impacts during construction and operation would be minimized further. Therefore, no significant impact is anticipated.

Comment No. 12-385A-13

13. Is water being drained out of the aquifer? Will that affect the hillsides?

Response to Comment No. 12-385A-13

The Project does not propose any extraction of groundwater from the underlying aquifers other than as may be removed by dewatering activities for construction or

operation of subsurface structures. With regard to potential dewatering activities, please refer to Response to Comment No. 12-24 above for additional information.

Comment No. 12-385A-14

14. What will be done for wildlife and natural habitat with the reduced water levels?

Response to Comment No. 12-385A-14

Potential impacts to groundwater levels are discussed in Section IV.G.2., Water Resources – Groundwater, of the Draft EIR, and found to be less than significant. The commenter is also referred to Response to Comment Nos. 12-22 through 12-24, above regarding potential impacts to water levels.

For the reasons described above, this potential decrease in groundwater would not significantly impact wildlife. For additional information regarding potential impacts to wildlife, please refer to Section IV.I, Biota, of the Draft EIR. As explained in detail in Section IV.I, Biota, of the Draft EIR, with implementation of the recommended mitigation measures, the proposed Project would have less than significant impacts on biological resources.

Comment No. 12-385A-15

15. What happened to the underpass under Lankershim Blvd. from the Metro Station?

Response to Comment No. 12-385A-15

There is no underpass under Lankershim Boulevard proposed as part of the Project. As discussed on page 652 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, the mitigation program for the original Universal City Metro Red Line Station construction by Metro included a pedestrian tunnel beneath Lankershim Boulevard to provide a pedestrian connection between the Universal City Metro Red Line Station and the east side of Lankershim Boulevard. The pedestrian tunnel was never constructed. Pursuant to a settlement agreement unrelated to the proposed Project, Metro will construct a pedestrian bridge in lieu of the originally proposed tunnel, and in June 2012 the Metro Board of Directors authorized the full budget to design and construct the bridge.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385A-16

16. Now that COMCAST will buy NBC Universal, will the proposed Project change?

Response to Comment No. 12-385A-16

The proposed Project analyzed in the Draft EIR has not been changed. The comment does not address the environmental analyses in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385A-17

17. Why would the East/West road be eliminated?

Response to Comment No. 12-385A-17

The County Highway Plan identifies the location of existing and proposed roadway improvements. One of the proposed roadway improvements shown on the County Highway Plan is a future major public highway (100 foot right-of-way) through the Project Site, referred to as the East-West Road, that connects Forest Lawn Drive/Lakeside Plaza Drive and Lankershim Boulevard/Bluffside Drive (see Figure 226 on page 2414 in Section V, Alternatives to the Proposed Project of the Draft EIR). The proposed alignment for this planned, unbuilt roadway would be through the existing on-site Studio and Business Areas, thus requiring demolition of existing on-site structures, parking lots, utility infrastructure and relocation of access gates. One of the discretionary actions requested to implement the proposed Project is the deletion of the East-West Road from the County Highway Plan. Alternatives 8 and 9 within Section V, Alternatives to the Proposed Project, of the Draft EIR, serve to inform the decision-makers in evaluating the Project's requested deletion of the East-West Road from the County Highway Plan. Further, as stated on page 416 of Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, the County is currently in the process of updating the County General Plan including, but not limited to, an update to the County Highway Plan. The Draft County Highway Plan no longer shows the East-West Road or the Forman Avenue Extension (see Figure 4.4 referenced on pages 79–80 of the Draft Mobility Element. The commenter is referred to Topical Response No. 10: East-West Road Alternatives (see Section III.C, Topical Responses, of this Final EIR), for further information regarding the East-West Road.

Comment No. 12-385A-18

18. How is it possible to put in additional lanes on Barham when there are houses on the top of the hill and in some locations there is no room to expand?

Response to Comment No. 12-385A-18

As described in Mitigation Measure B-5 on page 669 of the Draft EIR:

> The Project Applicant or its successor shall widen and restripe Barham Boulevard from Forest Lawn Drive/Lakeside Plaza Drive to Buddy Holly Drive to provide three contiguous southbound lanes, two northbound lanes, and left-turn pockets to minor streets throughout the length of the roadway section from Forest Lawn Drive/Lakeside Plaza Drive on the north to Buddy Holly Drive/Cahuenga Boulevard (East) on the South. The Project shall also plant trees along the Project Site frontage as part of the landscaping for the corridor.

These Barham Boulevard improvements would be constructed within the existing public right-of-way with additional dedication of Project Site property where available adjacent to the Project Site.

Comment No. 12-385A-19

19. Why are the City and County Specific Plans less restrictive than the current codes? Basically, the proposed Project would have carte blanche to do whatever they want at any time?

Response to Comment No. 12-385A-19

Specific plans are common land use approvals used to implement the General Plan in particular areas. In unique areas and developments, such as mixed use districts, a specific plan can provide zoning regulations where conventional zoning districts may not achieve the desired planning results. Given the unique set of uses at the Project Site and the proposed development, including the mixed use nature of the Project, a specific plan is an appropriate land use approval for the Project Site. In some circumstances, the proposed specific plans may be less restrictive than the current code but in some circumstances they are more restrictive. See also Response to Comment Nos. 12-3 and 12-59.

Comment No. 12-385A-20

20. The US 101 Interchange Improvements at Universal Terrace Parkway (Campo de Cahuenga Way) would require the use of Metropolitan Transportation Authority and Caltrans Park and Ride Facility overflow lot ("Caltrans Overflow Lot") along Ventura Boulevard; and the Metro Transportation Authority and County Park and Ride Facilityoverflow [sic] lot, also along Ventura Boulevard ("County Overflow Lot") for construction staging. If Phase 1 of the proposed Metro Universal project is constructed prior to the construction of the US 101 Interchange Improvements, the temporary loss of parking in both of these overflow parking lots would be accommodated in the proposed Phase 1 Metro Universal parking facility. If the Metro Universal project is delayed or

does not go forward, the temporary loss of parking in the overflow parking lots would be addressed by the Applicant providing substitute parking in the vicinity and shuttle service from the substitute parking to the Universal City Metro Red Line Station during the hours of operation of the Red Line." This would significantly affect Ventura Blvd. in Studio City, plus where would they put the overflow parking?

Response to Comment No. 12-385A-20

As noted on page 698 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR and in the comment, if the proposed Metro Universal project is delayed or does not go forward, the temporary loss of parking during construction of the US 101 interchange improvement would be addressed by the Applicant providing substitute parking in the vicinity and shuttle service from the substitute parking to the Universal City Metro Red Line Station. The exact location of the substitute parking would be determined at the time of the construction of the US 101 interchange improvements in consultation with the Metropolitan Transportation Authority and Caltrans. The location will be in the vicinity of the Universal City Metro Red Line Station and may be on the Project Site. This temporary relocation of overflow parking is not considered a significant impact.

Comment No. 12-385A-21

21. The project's timeline for completion is 20 years - is that a best-case scenario or are there issues that could cause this project to take longer to build?

Response to Comment No. 12-385A-21

As stated on page 340 in Section II, Project Description, of the Draft EIR, the Applicant anticipates that construction of the proposed Project would conclude by 2030.

Comment No. 12-385A-22

22. What if the project takes longer; what additional transportation mitigation measures would then take place?

Response to Comment No. 12-385A-22

Please refer to Response to Comment No. 12-385A-21 above.

Comment No. 12-385A-23

23. Is the City of Burbank and City of West Hollywood under any legal or moral obligation to do all or any of the recommended mitigation measures?

Response to Comment No. 12-385A-23

As stated in Response to Comment No. 12-47, above, the Project would be required to implement all of the applicable transportation project design features and mitigation measures required as part of the Project's approvals. With regard to mitigation measures that require approval from other jurisdictions, see Response to Comment No. 12-306 above.

Comment No. 12-385A-24

24. What happens to the 101 freeway if Caltrans does not complete all of the recommended mitigation measures? Where does the State of California get the money to complete all recommended construction? How long will it take for the construction to be completed if the State of California only partially comes up with the ONE HUNDRED MILLION DOLLARS that is being projected to complete all 101-freeway construction? Is there anything in Caltrans' current or future budget to construct everything that needs to take place to the 101-freeway for all mitigation measures?

Response to Comment No. 12-385A-24

As described in Section IV.B.1.5, Traffic/Access – Traffic/Circulation, of the Draft EIR, the Project would be required to implement all of the applicable project design features and mitigation measures as identified in Section IV.B.1.5, Traffic/Access – Traffic/Circulation, of the Draft EIR.

The $100-million cost estimate of the traffic mitigation program is an engineering estimate of the implementation costs of the Project's proposed transportation improvement program developed for informational purposes only.

Comment No. 12-385A-25

25. Since this project is being touted as a Transportation Oriented Development (TOD) does the heavier use of the Red Line Significantly influence the already 250 million dollar operating deficit the Metro is currently experiencing? When does the Metro believe it will no longer be operating at a loss? Who covers the greater use of the Red Line costs -- the more the Red Line, Light Rail, Bus Rapid Transit (BRT) or other forms of Metro's public transportation are put into use the more the Metro and ultimately the taxpayer lose money. My question is, if this project touts the additional usage of the Red Line will NBC Universal, Comcast or whatever entity owns the development cover the additional expense of the Red Line?

Response to Comment No. 12-385A-25

An analysis of the Project's potential transit system capacity impacts is included in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR. As explained in more detail on pages 631–632 of the Draft EIR, based on average load factors in the morning and afternoon peak hours in the Project vicinity shown on Table 25 on page 755 of the Draft EIR, there is residual capacity in the Metro Red Line to accommodate the transit riders generated by the Project. In addition, generally an increase in ridership on an underutilized transit system will decrease operating losses rather than increase them. The comment is noted and has been incorporated into the Final EIR for the review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385A-26

26. What is the maximum daily capacity of the Red Line? Can additional cars be added to it and if so, who pays for that cost? Can adding additional tunnels or light rail to handle additional riders expand the Red Line and if so, who covers those costs?

Response to Comment No. 12-385A-26

The capacity of the Metro Red Line system shown in Table 25 on page 755 of the Draft EIR is 4,716 passengers per direction per hour with the 10-minute headway service that currently operates in the peak hours. The Metro Red Line has capacity to accommodate an additional 2,286 passengers in the A.M. peak hour and an additional 1,872 passengers per hour in the P.M. peak hour. This additional capacity on the Metro Red Line can accommodate the transit riders generated by the Project.

Comment No. 12-385A-27

27. How many riders are projected for the Red Line each year during construction and when the project is completed? What is projected rider-ship for all phases of construction? Are construction workers included in these numbers?

Response to Comment No. 12-385A-27

As discussed on pages 631-632 of the Draft EIR, the Project operation is expected to generate 1,037 morning peak hour transit trips and 1,194 afternoon peak hour transit trips. The Metro Red Line has capacity to accommodate an additional 2,286 passengers in the morning peak hour and an additional 1,872 passengers in the afternoon peak hour. This additional capacity on the Metro Red Line can accommodate the transit riders generated by the Project.

In terms of potential impacts on the transit system during construction, most construction worker trips are expected to occur before the morning and afternoon peak hours. During these hours, the transit system has excess capacity available to accommodate construction worker demand so significant impacts are not anticipated.

Comment No. 12-385A-28

28. What specifically is NBC Universal going to do to make employees and guests use the Red Line, Buses, Carpools, Vanpools, Telecommuting or other forms of mitigation measures specifically mentioned in the DEIR to get people out of their cars? What are the incentives to make people get off congested roads and the 101 freeway?

Response to Comment No. 12-385A-28

The commenter is referred to Response to Comment No. 12-146 above and Topical Response No. 4: Transportation Demand Management Program (see Section III.C, Topical Responses of this Final EIR), regarding the Transportation Demand Management Program. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385A-29

29. Who oversees and enforces all traffic mitigations? What happens if they are not completed? What is the time-frame for completion?

Response to Comment No. 12-385A-29

Each mitigation measure, including traffic-related mitigation measures, is assigned a monitoring agency and enforcement agency in the approved Mitigation, Monitoring, and Reporting Program.

Regarding the sharing of mitigation measures, the commenter is referred to Response to Comment No. 12-14, above.

The comment also states that the Project's mitigations should be implemented before the Project is allowed to begin construction. As noted in Section IV.B.1.5.n, Traffic/ Access – Traffic/Circulation, of the Draft EIR, similar to other developments in the City of Los Angeles, a detailed transportation mitigation phasing plan has been developed for the Project using trips as thresholds that were estimated based on the proposed development in each phase. The Project's transportation mitigation phasing program has been designed such that the Project is required to implement all mitigation measures tied to each phase of development prior to moving onto the next development phase. As noted in the City of Los

Angeles Department of Transportation's Assessment Letter dated April 2, 2010 (see Appendix E-2 of the Draft EIR):

> "Prior to the issuance of any building permit for each sub-phase, all on- and off-site mitigation measures for the sub-phase shall be complete or suitably guaranteed to the satisfaction of LADOT."
>
> and
>
> "Prior to the issuance of any temporary or permanent Certificate of Occupancy in the final sub-phase, all required improvements in the entire mitigation phasing plan shall be funded, completed, or resolved to the satisfaction of LADOT."

Consistent with the Los Angeles Department of Transportation Assessment Letter, the proposed City and County Specific Plans provide that prior to issuance of the approval for a Project under the Specific Plan, the Department of Transportation assign traffic improvements, if any, to the Project from the approved Traffic Mitigation Phasing Plan. Further, the proposed City Specific Plan requires that prior to the issuance of a building permit for a Project under the City Specific Plan, the Applicant shall guarantee, to the satisfaction of the Department of Transportation, the construction of any required traffic improvements for the Project (See Section 7.2 of the proposed Universal City Specific Plan included as Appendix A-1 of the Draft EIR). Similarly, the proposed County Specific Plan requires that prior to the issuance of a building permit for a Project, the Applicant provide documentation satisfactory to the County Regional Planning Director that the Applicant has guaranteed the construction of the required traffic improvements to the satisfaction of the City of Los Angeles Department of Transportation. (See Section 14 of the proposed Universal Studios Specific Plan included as Appendix A-2 of the Draft EIR). Implementation of the mitigation measures will be subject to the mitigation monitoring and enforcement requirements set forth in the approved Mitigation Monitoring and Reporting Program and the implementation and enforcement procedures of the respective Specific Plans. Further, to the extent the mitigation measure is guaranteed prior to issuance of the building permit, as discussed above, the bond provisions would be available for completion of the measure.

Comment No. 12-385A-30

30. In Studio City, there is currently either proposed or under construction the Colfax Bridge, LA DWP Trunk Line Replacement Projects(s) and the Equinox Gym on Ventura Boulevard which will and are greatly affecting vehicular and pedestrian mobility - have any of these projects been factored into traffic counts or mitigation measures?

Response to Comment No. 12-385A-30

In the event that Project construction occurs concurrently with the construction of the projects referenced in the comment, the Project's construction traffic management plan would take into account any major off-site construction projects that would affect traffic in the Project area and through this process construction traffic impacts would be reduced to a less than significant level. In terms of cumulative operational impacts, two of the three projects are infrastructure projects and would not add traffic to the local roadway network. The Equinox Gym project on Ventura Boulevard was proposed after the establishment of the Project's related projects list and as a result is not on the Project's related projects list. As noted in the traffic assessment for the Equinox Gym project, the proposed gym project would replace an existing 27,263 square-foot office with a proposed 27,263 square-foot health club. The proposed gym project will generate 418 daily net new trips with a net reduction of 11 trips in the morning peak hour and an addition of 36 trips in the afternoon peak hour. (See Los Angeles Department of Transportation's Traffic Assessment for the Proposed Health Club at 16830 Ventura Boulevard dated October 19, 2011) The land use assumptions of the Project's transportation model for the traffic analysis zone within which the proposed gym project is located includes growth beyond that reflected by the gym project. In this manner the trips associated with this particular project are accounted for in the Project's traffic modeling.

Comment Letter No. 12-385B

Studio City Residents Association

P.O. Box 1374 * Studio City, CA 91614 * Ph (818)509-0230 Fax (818) 509-0260 * www.studiocityresidents.org

Comment No. 12-385B-1

February 3, 2011

John Foreman, Senior City Planner
Department of City Planning, Room 601,
City Hall Room,
Los Angeles, CA 90012

NBC Universal Evolution Plan
Draft. Environmental Impact Report
ENV 2007 -0254-EIR
State Clearing House No 200707-1036

This is the response of the Studio City Residents Association to the draft environmental impact report.

1. THE DRAFT ENVIRONMENTAL IMPACT REPORT IS LEGALLY INADEQUATE: IT IS PROCEDURALLY DEFICIENT

The Draft Environmental Impact Report (DEIR) referenced above addresses a proposed development that presents significant and in some cases severe impacts not only on the surrounding neighborhood but on other significant areas of Los Angeles and adjoining cities. The project is commonly referred to as the NBC Universal Evolution Plan and shall be referred to as such herein.

2. THE DEIR SHOULD BETTER REFLECT THE METRO UNIVERSAL PROJECT

One major defect and inadequacy of the DEIR for NBC Universal Evolution Plan is an inability or unwillingness to incorporate and thereby evaluate the effect of a proposed Metro Universal Project development immediately across Lankershim Boulevard at the MTA Redline Station (and the environmental effect on not just on [sic] the NBC Universal Evolution Plan but on the surrounding environments.)

In process with the City of Los Angeles is the DEIR for the Metro Universal Project to which public and other comments and responses have been filed. To date no final Environment Impact Report has been issued, approved or accepted for the Metro Universal Project. It is only upon the acceptance and approval of the Environment

Impact Report for the Metro Universal Project and the issuance of permits with conditions that the environmental impacts and the mitigation measures from that project will become known and can be reflected in the EIR for this project. Until this information is available then the DEIR for NBC Universal Evolution Plan is defective and fails to comply with the intended purposes of CEQA.

3. THIS DEIR AND THE EIR TO FOLLOW DOES NOT COMPLY WITH CEQA.

The purpose of a DEIR is to provide the public with detailed information about a Project before it is approved. (Pub. Resources Code §§ 21002.1; 21003.1.) “When significant new information is added to the EIR after public notice is given of the availability of the DEIR, but before certification, the EIR must be recirculated for public review . . .” (CEQA Guidelines § 15088.5; Pub. Resources Code § 21092.1.) Any recirculated Draft EIR should contain redline or other convenient methods of comparing the recirculated Draft EIR to the original. The NBC Universal Evolution Plan will be relying on unverifiable future projections rather than established facts therefore NBC Universal Evolution Plan DEIR is grossly inadequate. *Sunnyvale West Neighborhood Assn. v City of Sunnyvale City Council H 035135 Dec 16, 2010*. The City must recirculate a DEIR after verifiable and legally

adequate information is added. It will not be possible to rely upon the filed Responses in order to cure the draft's inadequacies.

4. SIGNIFICANT AND UNMITIGATED IMPACTS EXIST.

In addition, the NBC Universal Evolution Plan DEIR references "Significant and Unmitigatable Impacts". These impacts that cannot be mitigated commence at page 255 though [sic] page 373. These "Unmitigatable Impacts" refer to impacts that cannot be prevented or that no preventative measures can be taken for various reasons. The impacts on the community cannot "...be reduced to a level of insignificance" (p.255). yet it is proposed that these impacts remain and not be mitigated. Again, this is contrary to the requirements of CEQA.

The impacts are:

Solid Waste, Traffic, Noise and Air Quality.

When the NBC/Universal DEIR categorizes an impact as SIGNIFICANT and UNAVOIDABLE and no remedial action possible, this has effect of having making [sic] the report fail in its primary purpose.

Ignoring significant and unavoidable impacts has the effect of making an Environmental Impact Report deficient, incomplete and failing to be effective in addressing environmental impacts and concerns.

The DEIR does not state on what basis the significant and unavoidable impacts will be allowed and that will permit a project to go forward

5. INCORPORATION OF OTHER RESPONSES.

Studio City Residents Association joins the following organizations in their comments and objections and other matters raised their filings to the NBC Universal Evolution Plan DEIR and incorporates those comments and objections in this response as though set forth in full herein.

Communities United for Smart Growth
Studio City Neighborhood Council.

Respectfully submitted,

Alan Dymond
President
Studio City Residents Association

Response to Comment No. 12-385B-1

This comment is a copy of a letter commenting on the Draft EIR that was submitted by Studio City Residents Association, dated February 3, 2011 and is included as Comment Letter No. 72 to this Final EIR. Please see Response to Comment Nos. 72-1 through 72-6 for responses to the letter. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 12-385C

COMMENTS ON WATER

Comment No. 12-385C-1

AN ANALYSIS OF THE DWP'S URBAN WATER MANAGEMENT PLANS DATING BACK TO 1985 SHOWS THAT LONG TERM WATER PROJECTIONS HAVE BEEN GROSSLY OVERSTATED ON A ROUTINE BASIS IN ORDER TO ALLOW DEVELOPMENTS TO OCCUR.

EVERY REPORT FROM 1990 THROUGH 2007 HAS SHOWN AN OVER PROJECTION OF WATER SUPPLIES - YET THE DWP DOES NOT SHOW THOSE PUBLICATIONS OR PROJECTIONS.

WITH HUNDREDS OF PROJECTS RESULTING IN TENS OF THOUSANDS OF HOUSING UNITS BEING APPROVED OVER THE LAST TWENTY YEARS, EACH CITING THE UWMP AS EVIDENCE OF AVAILABLE WATER AND ACTUAL DELIVERIES AVERAGING FAR LESS THAN ANY OF THE PROJECTIONS - IT IS NOT DIFFICULT TO SEE WHY SOUTHERN CALIFORNIA HAS BECOME MIRED IN A PERMANENT DROUUGHT [SIC].

ALLOWING FURTHER DEVELOPMENT WILL ONLY DEEPEN THE ALREADY EXISTING DROUGHT IN SOUTHERN CALIFORNIA.

THERE IS HARD EVIDENCE AVAILABLE TO VALIDATE THIS.

Response to Comment No. 12-385C-1

The comment raises concerns regarding the Los Angeles Department of Water and Power's (LADWP) Urban Water Management Plan and development overall rather than the environmental analysis in the Draft EIR.

According to the 2010 LADWP Urban Water Management Plan, Appendix D, previous Urban Water Management Plan water supply projections have turned out to be higher than actual demands. However, it is important to note that projections of supply

reflect what can be produced and delivered if necessary to meet projected demands. If actual demands do not materialize at projected levels, then less supply is produced and delivered to meet those demands. In previous Urban Water Management Plan, LADWP anticipated that demands would gradually increase over time. This has not been the case. Changes in customer water use behavior has resulted in both increased water use efficiency and decreased demands. The net effect of these changes were that LADWP produced and purchased less water to meet actual demands than was envisioned in previous Urban Water Management Plans between 1990 and 2005.[33]

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment to No. 12-385C-2

STATE LAWS LIKE SB 610 AND SB 221 ARE SUPPOSED TO PROTECT WATER SUPPLY BY REQUIRING PLANNERS AND DEVELOPERS TO PROVIDE WRITTEN VERIFICATION OF SUFFICIENT SUPPLIES BY WATER AGENCIES, HOWEVER THE LAWS WEAKNESS IS THAT IT ALLOWS DEVELOPERS, PLANNERS AND WATER AGENCIES TO MERELY CITE UWMP “PROJECTIONS” TO GET APPROVED - INSTEAD OF “REAL” WATER!

THAT IS AND CANNOT BE AN ACCEPTABLE COURSE TO FOLLOW.

THIS LACK OF ANY CRITICAL REVIEW LEADS TO A DEEPER DROUGHT.

Response to Comment No. 12-385C-2

The comment appears to raise concerns regarding perceived weaknesses in SB 610 and SB 221. The comment does not address the environmental analysis in the Draft EIR.

Senate Bill 610 (Chapter 643, Statutes of 2001) and Senate Bill 221 (Chapter 642, Statutes of 2001) were companion measures that require counties and cities to obtain information regarding water availability prior to the approval of certain specified large development projects. Among other things, Senate Bill 610 amended California Water Code Section 10910 and Senate Bill 221 added Government Code Section 66473.7. California Water Code Section 10910 requires that counties and cities consider the availability of adequate water supplies for certain new large development projects. Government Code Section 66473.7 requires that counties and cities obtain written

[33] *City of Los Angeles Department of Water and Power, Urban Water Management Plan, 2005:* http://scag.ca.gov/rcp/pdf/uwmp/LosAngeles/LADWP_2005UWMP.pdf

verification from the applicable public water system of the availability of sufficient water supply for certain subdivisions.

As stated in Response to Comment No. 12-385C-1, the LADWP cites the Urban Water Management Plan in water supply assessments in accordance with Water Code Section 10910. The 2010 Urban Water Management Plan Section 11.4, Water Supply Assessments, explains that LADWP's Urban Water Management Plan uses anticipated growth as provided by demographic projections from Southern California Association of Governments (SCAG) data, re-allocated by Municipal Water District (MWD) into LADWP's service area. The City's General Plan uses population forecasts as provided by SCAG data as well; therefore, the Urban Water Management Plan projections are consistent with the City's General Plan as both use SCAG projections as their basis. In preparing water supply assessments, LADWP works with the Planning Department to confirm adequate water supplies for project's meeting specified criteria which includes projects that conform to the City's General Plan as well as those that conform subject to the approval by the City of a General Plan Amendment.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385C-3

WATER IS A KEY ELEMENT - A WATER ASSESSMENT IS A MANDATORY ELEMENT TO THE PLANNING PROCESS. AS A PREREQUISITE TO APPROVING A NEW PROJECT, A DEVELOPER OR CITY PLANNER HAS TO PROVIDE EVIDENCE THAT THERE IS "SUFFICIENT WATER" IN NORMAL AND DRY YEARS OVE [sic] THE NEXT TWENTY YEARS FOR THEIR PROJECT.

THIS DOES NOT EXIST IN THE EVOLUTION DEIR AND IS THEREFORE UNACCEPTABLE.

Response to Comment No. 12-385C-3

As stated in Response to Comment No. 12-385C-2 above, Government Code Section 66473.7 requires that counties and cities obtain written verification from the applicable public water system of the availability of sufficient water supply for certain subdivisions. California Water Code Section 10910 requires that counties and cities consider the availability of adequate water supplies for certain new large development projects. Consistent with these requirements, in April 2010, the Board of Water and Power Commissioners approved a Water Supply Assessment for the Project, a copy of which is included as Appendix N-1-2 of the Draft EIR. Specifically, the Board of Water and Power Commissioners found that "LADWP can provide sufficient domestic water supplies to the Project and approves the Water Supply Assessment prepared for the Project …"

As stated in Section IV.L.2, Utilities – Water, and Appendix N-1-2, Water Supply Assessment of the Draft EIR, the Project is estimated to increase water demand by 1249.1 ac-ft/year. Of that demand, 1003.1 ac-ft/year is calculated to be potable water and 246 ac-ft/year is calculated to be recycled water. As noted in the Draft EIR, the estimated water demand does not reflect reductions in water usage that would result from the water conservation measures included as project design features and described in Section L.2, Utilities – Water, of the Draft EIR. Water is supplied to the Project Site by the LADWP. The Los Angeles Aqueducts, local groundwater, purchased water from the Metropolitan Water District and recycled water are the primary sources of water supplies for LADWP. In addition, to meet the water demands of the Project, the Applicant would provide replacement water pursuant to the terms of the Surplus Water Supply Augmentation Agreement between the Applicant and LADWP. Under this agreement, the Applicant would provide water rights to LADWP that LADWP does not currently possess, thus increasing the water supply sources to which LADWP has access. The LADWP determined that the agreement would be necessary for the City area for 30 years and the County area for 50 years. The Surplus Water Supply Augmentation Agreement contemplates that the water rights would be from the Central and West Coast Basins. As indicated in the Water Supply Assessment for the Project, the Central and West Coast Basins are adjudicated groundwater basins. Under the adjudications, LADWP has specified, limited water rights in these basins. The water rights that the Applicant would provide LADWP under the Surplus Water Supply Augmentation Agreement would be in addition to LADWP's existing rights. As further noted in the Water Supply Assessment, there is an active groundwater rights sales and lease market in the Central and West Coast Basins. Based on the data for the Central and West Coast basins, LADWP determined that the Project demands could be offset through the purchase of annual adjudicated water rights in these basins.

In addition to the Applicant providing the additional water rights, the LADWP would increase the amount of reliable recycled water supply available to serve the Project Site thereby reducing the amount of potable water needed to support the proposed Project. With the inclusion of the project design features, including the agreement with LADWP to augment the water supply available to LADWP, impacts of the proposed Project on water supply would be less than significant.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385C-4

Projections Routinely Overstate Actual Supplies

LA'S URBAN WATER PLAN
David Coffin

How is it that every small, medium and large development or project that comes before neighborhood councils, city planners and the city council is always cited by both developers and the water department as having 'sufficient water' yet we find ourselves in the grips of a permanent drought and under an emergency water conservation order?

An analysis of Department of Water and Power's Urban Water Management Plans dating back to 1985 shows that long term water projections have been grossly overstated on a routine basis by as much as 41 percent leading planners and decision makers to believe that sufficient water would be available when projects before them were being evaluated.

This study compared the amount of water projected in each regularly published UWMP with the actual amount of water later received and found that not since the 1985 report have projections come acceptably close.

Every report from 1990 to 2005 has routinely projected water deliveries well above 700,000 acre feet with some projections as high as 799,000 AF. Yet a review of historical data shows that LADWP has only once received more than 700,000 AF in the last 30 years and rarely have actual deliveries exceeded 680,000 AF.

In spite of this, 13 out of 16 forecasts from the last four water management plans had water deliveries projected at over 700,000 AF. They were

• The 1990 Urban Water Management Plan with 'projected' deliveries of 707,300 AF in 1995, 728,400 AF in 2000,745,500 in 2005 and 756,500 AF in 2010.

• The 1995 plan with 'projected' deliveries of 673,000 AF in 2000, 695,000 AF in 2005, 725,000 AF in 2010, and 750,000 in 2015.

• The 2000 plan with projected deliveries of 679,000 AF in 2005, 718,000 AF in 2010,757,000 AF in 2015, and 799,000 AF in 2020.

• The 2005 plan with projected deliveries of 683,000 AF in 2010,705,000 AF in 2015,731,000 AF in 2020, and 755,000 in 2025 and 776,000 in 2030.

With hundreds of projects resulting in tens of thousands of housing units being approved over the last twenty years, each citing the UWMP as evidence of available water and actual deliveries averaging only 624,123 AF a year, it's not difficult to see why Southern California has become mired in a permanent drought.

GROUNDLESS OPTIMISM IN FUTURE WATER

1990 UWMP REPORT Year	Projected	Actual	Percent overstated
1988			
1990	689,900	621,476	11.0%
1995	707,300	608,754	16.2%
2000	728,400	669.549	8.8%
2005	745,500	623,438	19.6%
2010	756,500	536,554	41.0%
2015			
2020			
2025			
2030			
BOLD numbers are average yearly yield (1987/2009)			

Why are we routinely committing new water to every new housing project that is proposed when actual deliveries chronically fall short of projected deliveries? And why are laws designed to protect water supplies such as SB 610 and SB 221 failing to over-commitment water?

Exaggerated projections are not only an LADWP phenomena; many regional water districts also seriously overstate future supplies in their water plans. UWMP data suggests that water supply projections are developed to meet regional housing needs assessments (RHNA) that are distributed by local multi-county government agencies such as SCAG.

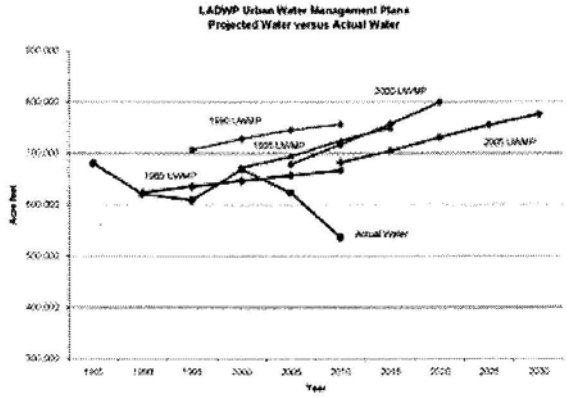
Rather than using infrastructure such as water and power as a determining factor in housing growth thus protecting water supply, the opposite occurs. Housing targets are cited first and water departments tweak their projections dramatically to achieve those goals. Even if it means Citing projections that can never be met.

Because water projections are overstated by such large margins, this all but guarantees that every new housing project proposed within the scope of the UWMP will be green-lighted as having sufficient water supplies by LADWP officials.

A DROUGHT IN THE PLANNING

Distinct from the drought of 1987 where growth was the primary factor, today's drought has its roots dating back to the 1990 UWMP when the long term projections inexplicably rose 10 to 12 percent over the previous UWMP. Urban Water Management Plans were

supposed to provide a layer of protection for our water supplies after the 1987 drought, but instead the new projection models have been used to assure project approvals.



The increased projections in UWMP's are primarily due to overly optimistic projections in groundwater and to a lesser extent recycled water, seawater, desalinization, the collection of urban runoff, other forms of water conservation. On top of that is a big dose of MWD purchases to make up for the shortfall.

For example, the last four UWMP's cited increased groundwater yields ranging between 106,000 and 170,000 AF. However groundwater yields dropped significantly in 2000 and the actual deliveries never materialized. The actual yields of underground water averaged about 86,000 AF and were as low as 48,000 AF.

Similarly recycled water is cited to increase to 15,000 to 29,000 AF in the latest water plan but the average amount received between 2000 and 2009 has only been 3,457 AF. This year's recycled water is 118% below 2005 UWMP projections.

Water plans also rely heavily on imported MWD water to make up the shortfall but that supply is uncertain as MWD struggles to procure enough water from the State Water Project and Colorado River to deliver to water not only to the LADWP but also the dozens of other water agencies all over the Southern California region.

State laws like SB 610 and SB 221 are supposed to protect water supply by requiring planners and developers to provide written verification of sufficient supplies by water agencies. However the laws weakness is that it allows developers, planners and water agencies to merely cite UWMP 'projections' to get projects approved instead of 'real' water.

Another weakness is that neither SB 610 or SB 221 require that UWMP's be accurate, nor do they require the figures to be reviewed, updated or amended as actual supplies come in at the projected times. The projections that were approved in the original plan remain continue to be cited for as long as five years later. Even when supplies dwindle to record per capita lows.

Since there is no requirement by law to review actual deliveries against projections, this virtually guarantees that projects of any size will be assured to receive a letter by LADWP acknowledging sufficient water supply when the plans targets have not been met in the past.

LACK OF CRITICAL REVIEW LEADS TO DROUGHT

As the last twenty years projections in urban water management plans have become so overstated, even contrived, this has led to an absence of critical review by people who review and make decisions about a project. After all, if we have 680,000 AF of water today and in 2010 we are expecting to reach 750,000 AF what is there to worry about?

Planning commissioners, elected leaders, neighborhood councils and community residents have generally treated the conclusions of 'sufficient water' in each report as 'fact' when new developments come to them for approval.

This lack of critical review is repeated over and over again and is especially in plain view when questions are raised or when written comments to draft environmental documents for new developments cite the obvious disconnect between 'sufficient water' and the recent need for the Emergency Water Conservation Order (2008) and later the mayor's Water Supply Action Plan (2008). City planners and developers routinely dismiss the comments out of hand by merely pointing out the latest UWMP cited in their EIR and the future water projections in them.

WATER - A KEY PLANNING ELEMENT

A water assessment is a mandatory element to the planning process. As a prerequisite to approving a new project, a developer or city planner has to provide evidence that there is 'sufficient water' in normal and dry years over the next twenty years for their project.

Evidence that a project has the water it needs is typically provided by citing the latest UWMP in the projects [sic] Environmental Impact Reports (EIR) and obtaining a letter from the water agency acknowledging the availability of water over this twenty year period. Water agencies themselves generally just cite their own UWMP in the acknowledgement.

Similarly, cities and counties must demonstrate in their housing plans that they have sufficient water supplies if growth is projected in their General Plan.

Because of this, the Urban Water Management Plan becomes a vitally important document to the planning process. If reports consistently overstate the amount of available water, planners ratchet up the housing production and approvals to meet established housing goals. Years later when water supplies do not meet the previously cited water projections, emergency solutions have to be enacted to minimize environmental damage and keep the taps flowing. This is the situation that exists today.

INFRASTRUCTURE IMBALANCE

Overstating future water supplies in water management plans results in housing inventories that outstrip water availability. This imbalance affects local residents by reducing their base

price (Tier I) allocations, produces higher water bills, forces a curtailment of outside irrigation, and creates penalties. And it doesn't stop there, both the Central and Southern California regions have been seriously affected as drought restrictions have led California's agriculture industry to fallow land and layoff [sic] workers resulting in a loss of one billion dollars to the state in 2009.

THE URBAN WATER MANAGEMENT PLAN

Why is an accurate Urban Water Management Plan so important?

No single document is more regularly cited in the dozens of Draft Environmental Impact Reports (DEIR) submitted by developers to the city planning department and approved by planning commissions and city councils than the Urban Water Management Plan.

In order for the public and decision makers to understand how a large proposed project will impact neighbors, traffic, sewers, water, power, fire, police, libraries, parks, etc., an environmental impact report is drawn up.

The projects DEIR provides important details on infrastructure, traffic, demographics, demands for public safety and community services, and other information. Go online and download any of the dozens of DEIR's that the city makes available and you will find the UWMP cited in the Utilities section. When DEIR's are first published there is a comment period where the public is invited to comments on the project.

When questions and comments on the project are received, they are answered and noted and then added to the appendix of the final report. When completed and published in its final form the document becomes known as the Final Environmental Impact Report or FEIR. It is this document that zoning administrators, area planning commissions, and city officials review when deciding to approve or deny a project.

With tens of thousands of "housing units projected" to be proposed and built in the city of Los Angeles between 2006 and 2014 it is of the utmost importance that the information provided for these reports be accurate otherwise serious infrastructure imbalances will occur as successive projects are green-lighted.

THE BUNDY EXAMPLE

As noted before, water assessments provided for major projects rely entirely on the original projections published in the water plan. A projects water assessment completely ignores the actual supplies received after the water plan was published approved.

I could have picked any project since they all cite water availability the same way but the Bundy Village and Medical Park was most convenient. This projects Water Supply Assessment (WSA) was based on "water supplies available during normal, single-dry, and

multiple dry water years during the 20-year projections" like all other assessments. It was predictably approved later on by the LADWP Board of Water and Power Commissioners which cited the 25 year projection of 776,000 AF in the 2005 UWMP as evidence of sufficient water for the project.

In response to the projects DEIR, one local neighborhood council submitted a comment asking that the Water Supply Assessment be re-evaluated in light of the fact that the city reduced water supplies due to drought and regulatory restrictions."

The planning department's reply to the neighborhood council comment merely restated the water supply assessment saying that it "continued to remain adequate" citing sections of the California water code and noted that the twenty year projection is sufficient to meet water demand. It sidestepped the request to re-evaluate the water supply assessment and punted that task to elected officials who would have to approve the project.

City planners always quote the results of a UWMP as 'fact' while ignoring the years of projections that were not met including 2005 UWMP projection of 718,000 AF by 2010 cited in the plan. Next year's level is not likely to come close to being achieved given this year's delivery of 536,554 AF reported by LADWP. They also ignore the historical fact that every previous UWMP's projection above 700,000 has been missed and missed by far, ranging from 60,000 to 190,000 AF.

Looking at historical indicators there no category of supply (aqueducts, groundwater, recycled, MWD, etc.) there to believe that anything above 699,000 AF can be routinely reached now or in the future. The last four water management plans, an expensive product to produce, have not been worth the paper they are written on.

Basing today's planning policies on doubtful long range future water projections that trend up while real supplies trend down or flat is a fool's game and one that will irreversibly damage the community economically and in quality.

(David Coffin is a long-time activist and an occasional contributor to CityWatch. He blogs at westchesterparents.org and can be reached at david@westchesterparents.org) –cw

CityWatch
Vol 8 Issue 92
Pub Nov 19, 2010

Response to Comment No. 12-385C-1

The comment consists of an article regarding LADWP's Urban Water Management Plan, water supply projects and, by way of example, the Bundy Village and Medical Park. The comment does not address the environmental analysis of the Draft EIR. The comment

raises issues similar to the issues raised in Comment Nos. 12-385C-1 through 12-385C-3 above. The commenter is referred to Response to Comment Nos. 12-385C-1 through 12-385C-3 above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 12-385D

Complete Comments NBC Universal Evolution Plan

From: hippolady@roadrunner.com
Subject: Complete Comments NBC Universal Evolution Plan
Date: Mon, December 20, 2010 1046 am
To: jon.foreman@lacity.org
Cc: mariana.salazar@lacity.org

Lisa Sarkin; Studio City Neighborhood Council; 11603 Kelsey Street; Studio City 91604; Phone: (818) 980-1010 home (818) 439-1674 cell

Comment No. 12-385D-1

My comments are simple with respect to Studio City, please consider them to be questions:

The current proposed project, NBC Universal Evolution Plan, is too large for the southeast valley and the proposed City Specific Plan takes away too many checks and balances from the local communities.

Unfortunately, the city and county did not take the advice of the Studio City Neighborhood Council to combine the two projects on both sides of Lankershim Blvd. and on Barham Blvd. into one EIR. BUT the Evolution DEIR mentions the Metro/Universal Project with combined mitigations that do not satisfy the communities for Metro alone. Shared parking is proposed in an area that already has major parking problems. There is no circulation in the area, but removing the required East/West street is being requested. The consideration that the residential community on the east side of the lot is Metro adjacent is not mitigated by a shuttle service through the lot or onto Barham Blvd., Ventura Blvd., Cahuenga Blvd., Moorpark Street or Riverside Drive.

Numerous places in the Metro DEIR unavoidable impacts are listed, so adding the Evolution to these mitigations will make those unavoidable impacts even more pronounced. Plus, the Metro mitigations do not reduce the level of significance for Studio City, because Studio City is listed as only a hillside community. Studio City's boundaries are (from the SCNC Bylaws)

NORTH: Coldwater Canyon Boulevard where it intersects US-101 (Ventura Freeway); Ventura Freeway; US-101 / CA-134 / CA-170 freeway interchange.

EAST: US-101 / CA-134 / CA-170 freeway interchange; US-101 (Hollywood Freeway); Vineland Avenue; Whipple Street; Lankershim Boulevard to Fredonia Drive (excluding the two-acre parcel on the west side of Lankershim owned by Universal Studios, described as Lots 1, 2 and 3 of Tract 25507 and portion of lot 279 of Lankershim Ranch and Water Company, also know [sic] as the "Hotel/Post Office parcel"); the border between zip codes 91604 and 90068; border between zip codes 91604 and 90068 where it intersects Mulholland Drive (just west of Torryson Place at approximately 7700 Mulholland Drive).

SOUTH: Border between zip codes 91604 and 90068 where it intersects Mulholland Drive (just west of Torryson Place at approximately 7700 Mulholland Drive); Mulholland Drive; intersection of Mulholland Drive and Split Rock Road.

WEST: Intersection of Mulholland Drive and Split Rock Road; sightline to the southern terminus of Longridge Avenue; Longridge Avenue; (all following descriptions are the border between zip codes 91604 and 91423 until it reaches the intersection of Kling Street and Coldwater Canyon Boulevard) Ventura Boulevard; Fulton Avenue; Valleyheart Drive north of the Los Angeles River; Ethyl Avenue; Sarah Street; Van Noord Avenue; Kling Street; Coldwater Canyon Boulevard; Coldwater Canyon Boulevard where it intersects US-101 (Ventura Freeway).

The errors and omissions related to Studio City were outlined in the responses from the SCNC, Studio City stakeholders, including myself, during the Metro DEIR process. I am disappointed that these changes were not made in the Evolution DEIR. Many of the documents provided by the Evolution DEIR are outdated and need to be updated. The city is currently rationing water, brown outs have occurred at times and schools are no longer year round, to name a few.

The current DEIR puts all of the services required by a residential community to be placed in the City of Los Angeles at a time when the current residents are receiving little to no services. All of the southeast valley schools are filled over capacity. The current residents are being bombarded with increasing fees but streets, sewer capacity, water, power and all other services are being reduced. The infrastructure of the southeast valley cannot absorb any further development without a restructuring and improvement to the infrastructure. The current capacity of the 101, 134 and 170 freeways and Lankershim Blvd, Ventura Blvd, Cahuenga Blvd. and Barham Blvd. must be improved if the proposed Metro and/or Evolution developments are to go forward in any form.

How do the southeast valley communities absorb any more density with the currently proposed mititations [sic]? What types of jobs are really being proposed? Where are the

community safeguards and involvement in the decisions? When are the current residents considered in the project compliance? How can unavoidable impacts be reduced to a level of insignificance, instead of being proposed at all?

I request that a combined EIR is for both the Metro/Universal Project and the NBC Universal Evolution Plan be required for these two developments and that no shared mitigations be considered.

Response to Comment No. 12-385D-1

This comment incorporates comments from Lisa Sarkin on the Draft EIR that are included in this Final EIR as Comment Letter No. 288, Lisa Sarkin, dated December 20, 2010. Please see Response to Comment Nos. 288-1 through 288-11 for responses to the comments. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 12-385E

PROPOSED NBC UNIVERSAL EVOLUTION PLAN
COMMENTS and QUESTIONS
By Barbara Monahan Burke January 11, 2011

Comment No. 12-385E-1

There must be recognition of the vast cumulative negative impact on the surrounding communities the proposed NBC Universal Evolution Plan (Evolution) in combination with the proposed adjacent Metro Project (Metro). Nothing will be able to mitigate the destructive impacts these projects will have on the scale, character and the quality of life in our community, Studio City.

Response to Comment No. 12-385E-1

The cumulative impacts of the NBC Universal Evolution Plan and the 256 related projects, including the Metro Universal project, were addressed in the analysis of cumulative impacts within each environmental issue included in Section IV, Environmental Impact Analysis, of the Draft EIR. (See page 269 of the Draft EIR). As discussed on pages 2434-2435 of the Draft EIR, based on the analysis contained in Section IV of the Draft EIR, implementation of the Project would result in significant and unavoidable impacts with regard to the following five issues:

- Traffic (during Project operations and cumulative conditions);
- Noise (during Project construction and cumulative conditions);

- Air Quality (during Project construction and operations and cumulative conditions);
- Solid Waste (during Project operations and cumulative conditions); and
- Off-Site Mitigation Measures (during construction and operations).

Impacts in three of these issue areas (traffic, air quality, and solid waste) are due in part to existing and future regional constraints that affect virtually every major project in the area. The remaining issue area (noise) is specifically related to the Project Site and the methodology that was applied to analyze this environmental issue. All other potential environmental issue areas analyzed in the Draft EIR would be less than significant or reduced to less than significant with implementation of the recommended mitigation measures.

Regarding the Metro Universal project, the commenter is referred to Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, of this Final EIR).

Comment No. 12-385E-2

This report will deal with the impacts on LADWP water and electrical usage, as well a [sic] waste sanitation, with a few other items brought up in these sections.

We, the Los Angeles ratepayers, are always asked to CONSERVE water and energy and create GREEN scenarios as best we can. In fact, the residents over the past quarter century have succeeded far better at conservation than commercial and industrial businesses overall. Yet, here we have a so-called inevitable giant project on a modest parcel that until now has coexisted with the surrounding predominantly R1-1 residences. The proposed increased density is unacceptable for our San Fernando Valley suburban area. We are not urban downtown and do not aspire to become “Times Square West.”

Response to Comment No. 12-385E-2

The Project’s potential impacts with regard to water supply, electricity, wastewater, and solid waste are analyzed in Sections IV.L.2, Utilities – Water; IV.L.4, Utilities – Electricity; IV.L.1, Utilities – Sewer; and IV.L.3, Utilities – Solid Waste, of the Draft EIR. The commenter is referred to those sections for a detailed discussion of the potential impacts and proposed project design features, including water and energy conservation features, and mitigation measures.

As explained in Response to Comment No. 12-4, the density in the Project area exceeds the population density used by the U.S. Census Bureau to define urban areas.

For this reason, the term "urban" was used throughout the EIR as it refers to the Project area. Please refer to Response to Comment No. 12-4 for further information.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385E-3

In addition, there is a proposal for not only a jail but also a prison surrounded by existing R1-1 residential and modest commercial areas. This is absolutely inappropriate and even dangerous to our community that works so hard to try to achieve safety for our neighborhoods.

Response to Comment No. 12-385E-3

The comment incorrectly states that the Project includes a prison on the Project Site. As discussed in Section IV.K.2, Public Services – Police/Sheriff of the Draft EIR, there is an existing County Sheriff substation located on the Project Site that is staffed with one lieutenant, two sergeants, one detective, one team leader, and twelve deputies. As set forth in Mitigation Measure K.2-2:

> The Applicant or its successor shall provide a new up to 16,000 square foot facility within the County portion of the Project Site, for the shared use of the County Sheriff's Department, contract security, and corporate security for the Project Site. Construction of the facility shall meet the operational needs of the County Sheriff's Department and comply with applicable California Code of Regulations Title 15 requirements and County standards. The facility shall include holding cells, office space, locker room, and several access points. The Applicant or its successor shall improve the facility at its cost. The facility shall be available once certificates of occupancy have been issued for a cumulative total of 765,000 square feet of net new Project development within County portions of the Project Site or 2022, whichever comes first, and once constructed shall replace the existing on-site County Sheriff's Department facility.

Holding cells are used in the case that a person is arrested and needs to be held before being transferred to another facility. As explained in Draft EIR Section IV.K.2, Public Services – Police/Sheriff, of the Draft EIR, the new Sheriff's station would help to provide immediate Sheriff and public safety services to the surrounding area and thus would enhance, rather than deteriorate, public safety. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385E-4

Open-space living, especially along the proposed green spaces by the Los Angeles River, is essential for our residents and workers. We need a broad space-allotment on both sides of the Los Angeles River to provide walking trails, bikeways for recreation and travel for work including spots for enjoying nature. It is wasteful of our PUBLIC OPEN SPACE to claim only a 12-foot right-of-way is there for active or passive activities beyond the concrete walls of the current channel - that beyond being proposed as available for a planned roadway and conduit for the LADWP projects. Again, inappropriate and unacceptable.

Response to Comment No. 12-385E-4

The comment appears to be referring to the proposed 12 foot set back from the Los Angeles River Flood Control Channel included with the Proposed City Specific Plan. As explained on pages 418–419 in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, the northeastern portion of the Project Site that abuts the Los Angeles River Flood Control Channel is within the jurisdiction of the City of Los Angeles. The remaining approximately three-fourths of the northern edge of the Project Site is adjacent to River Road, a two-lane roadway that runs along the Los Angeles River Flood Control Channel. The majority of this northern edge is within the jurisdiction of the County Los Angeles and the majority of the River Road roadway is owned by the Los Angeles County Flood Control District. The County owned roadway area is approximately 20 feet in width.

As stated in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, the Applicant will cooperate with the County, City and other agencies as necessary to accommodate the future use of the County land for public use as contemplated by the County River Master Plan and to continue to use, if allowed by the County, a portion of River Road for studio access. Further, separate from the proposed 12 foot setback, in the northeastern portion of the Project Site that is within the City's jurisdiction and owned by the Applicant, the Project proposes a River Trailhead Park that would provide access to the river area, and connect the existing bike path along Forest Lawn Drive and the proposed bike path along the proposed North-South Road. If the County implements a public trail on the County owned portion of the Los Angeles River Flood Control Channel frontage, that path could be connected to the proposed River Trailhead Park and the internal bike path along the North-South Road.

Comment No. 12-385E-5

The terms of the LADWP agreement refer to both 30 and 50 year time frames for the city water usage and the county water usage respectively. Why is it different? 30 years appears more frequently for the city than the 50 years for the county. Both terms of agreements (with the city and the county) should be the same. The county claims better terms, but both

should be in perpetuity. As it is, the other ratepayers will eventually have to put up with higher rates for, again, lesser usage by them. The water and power rates will skyrocket anyway as the adjoining areas' density increases dramatically (in our eyes for the worse) with the unmitigated affects of the proposed development dropped into the midst of Studio City without consideration for those who already live and work in the area.

Response to Comment No. 12-385E-5

As stated in the Water Supply Assessment for the Project (Appendix N-1-2 of the Draft EIR), the terms of the Surplus Water Supply Augmentation Agreement were determined in order for the Department of Water and Power to adequately meet the water demands of the Project which are different in the City and County portions of the Project Site. As stated in the Resolution, the Board of Water and Power Commissioners found that with the Surplus Water Supply Augmentation Agreement between the Department of Water and Power and NBC Universal, the Department of Water and Power can provide sufficient domestic water supplies to the Project.

Comment No. 12-385E-6

In the 1955's agreement, potable water could be recycled but not reclaimed. Now, without essential transparency to our stakeholders, the LADWP "recycled" water is defined as "recycled" as well as "reclaimed" water. Only true "recycled" water should be allowed as "potable" water alongside natural spring water, natural aquifer water. Clean up the San Fernando Valley Aquifer and use it as natural water - do not put sludge over it and call the resulting water "recycled," it would be "reclaimed" with all the involved chemicals added to and within the original sewage, nothing natural about it.

Response to Comment No. 12-385E-6

The terms "reclaimed water" and "recycled water" are used interchangeably in the Draft EIR, which describes "reclamation (or recycled water)" as a potential source of water supply where wastewater is treated to a sufficient degree for certain types of uses. Recycled/reclaimed water is non-potable and must be conveyed in a separate system (conveyed in separate uniquely colored/marked pipes) from potable water to avoid the possibility of direct human consumption. (See Page 1853 of Section IV.L.2, Utilities – Water, of the Draft EIR.) As described in the Draft EIR, water recycling and reuse is serving to reduce Southern California's demand for potable water. LADWP utilizes recycled water produced by four wastewater treatment plants and restores the water to a level of quality specified by the California Department of Health Services before distributing it for landscaping and industrial uses. (Page 1861 of the Draft EIR.)

Comment No. 12-385E-7

The charts for proposed water usage, in all instances industrial waste permits should be mandatory for the industries.

Response to Comment No. 12-385E-7

It is unclear to what this comment refers. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385E-8

We already have police DUI stops at Ventura Boulevard by Lankershim Boulevard and at Laurel Canyon by Ventura Boulevard because of excessive alcohol and drug use of drivers in Studio City. The last thing we need are more bars.

Response to Comment No. 12-385E-8

As discussed in Section IV.K.2, Public Services – Police/Sheriff, of the Draft EIR, with regards to the sale of alcoholic beverages, the proposed City and County Specific Plans provide regulations governing the sale of alcoholic beverages within their respective jurisdictions which include operational conditions, such as hours of operation, requirements for employee training, seating provisions, security features, and consultation with the County Sheriff's Department and LAPD. The proposed Specific Plan regulations would provide an adequate approach for minimizing security issues related to the sale of alcoholic beverages. The increase in the sale of alcoholic beverages over existing conditions is included in the analyses of the Project's potential impacts to police/sheriff services. As stated on page 1749 of the Draft EIR, with implementation of the recommended mitigation measures, impacts to police/sheriff services would be reduced to less than significant levels. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385E-9

Shocked is the only work [sic] that comes to mind to describe the feeling when I read of the proposed shooting range. With increased above-ground gang activity in Studio City and an increase in area murders, it is disturbing to see "shooting" proposed. Inappropriate and unacceptable.

Response to Comment No. 12-385E-9

There is no shooting range proposed as part of the Project. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385E-10

The turf for the Lakeside Golf Course should be handled organically, both for handling pests and fertilizing. It is possible, and it is essential given Evolution's proximity to the Los Angeles River. We all work to honor the Los Angeles River, the intent of the Los Angeles River Improvement District, and this developer should, too.

Response to Comment No. 12-385E-10

The Lakeside Golf Course is not a part of the Project or the Project Site. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385E-11

In specifying irrigation schedules, the LADWP should urge watering in the morning. Evening water allows pests and diseases to thrive.

Response to Comment No. 12-385E-11

The Department of Water and Power restricts the timing for sprinkler use through its service area. In addition, there are a number of water-saving project design features included in the Project which directly relate to irrigation, such as "expanded use of high efficiency irrigation systems, including weather-based irrigation controllers with rain shutoff technology or smart irrigation controllers for any area that is either landscaped or designated for future landscaping". This project design feature, as well as others, are listed in Section IV.L.2, Utilities – Water, of the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385E-12

Surplus Water Supply

Page 5 of 15 #2.2.1 - Leaving the final decision to the LADWP Board of Commissioners is unacceptable. The courts should be able to override any decision by the politically appointed Board of Commissioners.

Response to Comment No. 12-385E-12

As described in Draft EIR Section IV.L.2, Utilities – Water, of the Draft EIR, State of California Water Code Sections 10910–10915 requires that counties and cities consider the availability of adequate water supplies for certain new large development projects. These statutory clauses require cities and counties to obtain written verification of sufficient water supply to serve proposed large development projects in their jurisdiction from the local water supplier. Pursuant to the State Water Code, a Water Supply Assessment was issued for the Project and included in Appendix N-1-2 to the Draft EIR and which is discussed in the Section, IV.L.2, Utilities – Water, of the Draft EIR.

Comment No. 12-385E-13

Page 1 - "Current flow levels" by the Bureau of Sanitation within Studio City are already beyond recommended capacity now as evidenced by the now permanent scrubber located on Radford Street.

Response to Comment No. 12-385E-13

As discussed in Draft EIR Section IV.L.1, Utilities – Sewer, of the Draft EIR, the City of Los Angeles Bureau of Sanitation stated in correspondence that the existing 18-, 24-, and dual 42-inch sanitary sewers are operating at 21 percent, 39 percent, and 47 percent of their capacity, respectively. No gauging information is available with regard to the 72-inch sanitary sewer located in Sierra Bonita Avenue. With regard to scrubbers, see Response to Comment No. 12-19, above.

Comment No. 12-385E-14

The Hyperion Treatment Plant proposed enlargement is unacceptable. With the ensuing loss of open space for the southeast valley, Studio City stakeholders have let officials know at numerous meetings that the little open space we have left must be preserved.

Response to Comment No. 12-385E-14

The Hyperion Treatment Plant is not part of the Project, but rather is operated by the City of Los Angeles Department of Public Works and is located in Playa del Rey and would not affect open space in the southeast valley. Further, as stated on page 1852 in Section IV.L.1, Utilities – Sewer, of the Draft EIR, Project impacts during construction and operations with regard to conveyance infrastructure and Hyperion Service Area capacity are less than significant.

Comment No. 12-385E-15

Page 2.6 - Default - 24 months is too long for water to not be delivered.

Response to Comment No. 12-385E-15

The comment appears to be referring to Section 2.6 of the Surplus Water Supply Augmentation Agreement (Appendix N-1-2 of the Draft EIR) which sets forth financial penalties the Applicant will pay the Department of Water and Power in the event that it is unable to provide replacement water supplies in the required timeframe. As stated in the Water Supply Assessment for the Project (Appendix N-1-2 of the Draft EIR), the terms of the Surplus Water Supply Augmentation Agreement were determined in order for the Department of Water and Power to adequately meet the water demands of the Project which are different in the City and County portions of the Project Site. As stated in the Resolution, the Board of Water and Power Commissioners found that with the Surplus Water Supply Augmentation Agreement between the Department of Water and Power and NBC Universal, the Department of Water and Power can provide sufficient domestic water supplies to the Project.

Comment No. 12-385E-16

California law requires this proposed project's assessment before the DEIR presentation. 4.3 allows the LADWP to provide "recycled" (read recycled/reclaimed) water to Evolution as asked. It should be "potable" unless true recycled without chemicals (not reclaimed) is to be used for irrigation.

Response to Comment No. 12-385E-16

Regarding recycled water, Draft EIR Section IV.L.2, Utilities – Water, of the Draft EIR describes that the Project's proposed water supply system, including the physical characteristics and existing capacities for all three system components: potable domestic water, fire protection water, and recycled water. Recycled water is wastewater that has been treated to a sufficient degree for certain types of uses. Recycled water is non-potable, and must be conveyed in a separate system from potable water to avoid the possibility of direct human consumption. Please refer to page 1861 of the Draft EIR for more discussion of recycled water and its potential uses. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

The commenter is also referred to Response to Comment No. 12-385E-6.

Comment No. 12-385E-17

There shall be maximum energy efficiency per Title 24 - clean, efficient and renewable. CONSERVATION shall be the first priority for all ratepayers; the Sierra Club agrees. The LADWP should emphasize this.

Response to Comment No. 12-385E-17

As discussed in Section IV.L.4, Utilities – Electricity, of the Draft EIR, each of the Project's buildings would be subject to the State Energy Conservation Standards for New Residential and Non-Residential Buildings (Title 24, Part 6, Article 2, California Code of Regulations). The Project shall incorporate energy conservation measures to exceed Title 24 (2005) requirements by 15 percent. In the event Title 24 is amended such that the energy conservation requirements exceed Title 24 (2005) by more than 15 percent, the Project would comply with the amended Title 24. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385E-18

Use permeable materials wherever possible to maximize infiltration of ground water.

Response to Comment No. 12-385E-18

As explained in Section IV.G.2, Water Resources – Groundwater, of the Draft EIR, no significant impacts are anticipated to potable water levels or the recharge of ground water from the construction and operation of the proposed Project; therefore, no mitigation measures are required or recommended.

In addition, as discussed in Section IV.G.1.b, Water Resources – Surface Water – Surface Water Quality, the County portion of the Project Site would comply with the County Low Impact Development Standards as applicable pursuant to the proposed County Specific Plan. Best Management Practices that may be used to comply with the County Low Impact Development Standards are set forth on pages 1384-1385 of the Draft EIR and include permeable materials such as porous pavement.

Development in the Mixed-Use Residential Area would be required to meet the applicable Standard Urban Stormwater Mitigation Plan Requirement. Best Management Practices designed to meet the Standard Urban Stormwater Mitigation Plan requirement are described on pages 1386-1388 of the Draft EIR and include preserving natural areas by minimizing impervious surfaces, bioswales/bioretention and media filters.

Comment No. 12-385E-19

The combination of trees, water and air working together creates a balance, a healthy environment dependent on each part. Our open space situation is healthful for us and other creatures, must be created. Evolution will bring density and disproportionate building at the expense of the trees, water and air and other living occupants of the area.

Response to Comment No. 12-385E-19

As discussed in Section II, Project Description, of the Draft EIR, the Project includes approximately 35 acres of open space. With regard to trees, please refer to Section IV.I, Biota, of the Draft EIR, which concluded that with implementation of the project design features and mitigation measures, the Project would have less than significant impacts with respect to biological resources. With respect to water, please refer to Section IV.L.2, Utilities – Water, which concluded that with implementation of the project design features and mitigation measures, the Project would not have significant impacts with regard to water. With regard to air, please see Section IV.H, Air Quality, of the Draft EIR, which concluded that with implementation of project design features and mitigation measures, Project construction emissions would be reduced.

Comment No. 12-385E-20

The practice of releasing hotter air from inside to outside might help the energy usage of proposed project building, but that in turn heats up the outside air not only for the project area but also for areas in the general vicinity of the project. That negatively affects our adjacent community directly, Studio City, forever.

Response to Comment No. 12-385E-20

It is unclear to what this comment refers. This comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385E-21

Page 7 - Okays shall be by the city, not (as suggested) by the project personnel. This demands transparency.

Response to Comment No. 12-385E-21

It is unclear to what this comment refers. This comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385E-22

Page 16 - Safety and security are essential. Once that thresh-hold is reached, no extra light shall be used because that is unhealthy for plants as well as people.

Response to Comment No. 12-385E-22

Artificial light impacts are discussed in Section IV.E.2, Light and Glare – Artificial Light, of the Draft EIR. Safety and security impacts are addressed in Section IV.K.2, Public Services – Police/Sheriff, of the Draft EIR. As discussed in more detail in Section IV.E.2 and Section IV.K.2 of the Draft EIR, impacts related to both Artificial Light and Public Services – Police/Sheriff, respectively, with implementation of the proposed project design features and mitigation measures, the Project would be less than significant. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385E-23

We decry the waste of energy Sign Districts would need, as well as the loss of "darkness."

Response to Comment No. 12-385E-23

Artificial light impacts are discussed in detail in Section IV.E.2, Light and Glare – Artificial Light, of the Draft EIR. As explained in Section IV.E.2 of the Draft EIR, artificial light impacts attributable to signage are less than significant. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. The Project includes a number of project design features that will reduce its electricity consumption via improved efficiencies and thereby reduce its emissions of greenhouse gases. See Project Design Features O-1, O-3, and O-4. These project design features include, among others: construction of new buildings that shall exceed Title 24 (2005) energy requirements by 15 percent; installation of energy-efficient appliances, lighting and lighting control systems, and heating and cooling systems, equipment, and control systems; and installation of consumption feedback modules to provide real-time and historical feedback to residents on their homes' energy consumption.

Comment No. 12-385E-24

Increase penalties for delay in water replacement.

Response to Comment No. 12-385E-24

It is unclear to what this comment refers. To the extent the comment is referring to penalties under the Surplus Water Supply Augmentation Agreement, please see Response to Comment No. 12-385E-15. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385E-25

With increased use of on-site water infiltration, storm drainage should decrease dramatically. Supervisor Zev Yaroslavsky is a proponent of on-site infiltration.

Response to Comment No. 12-385E-25

The comment is similar to Comment No. 12-385E-18, above. The commenter is referred to Response to Comment No. 12-385E-18, above.

Comment No. 12-385E-26

Finally, always replace annual water supplies with naturally achieved potable water, not reclaimed.

Response to Comment No. 12-385E-26

Water impacts, including use of potable and recycled water at the Project Site, are discussed in Section IV.L.2, Utilities – Water, of the Draft EIR. The Project does not propose to use recycled water as potable water. However, the Project does propose to increase its use of recycled water for irrigation which would reduce its need for potable water. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 12-385F

Transportation Comments & Questions from Todd Royal

RE: DEIR Case Number:
ENV-2007-0254-EIR

Comment No. 12-385F-1

Section One: Overall Comments and Questions

1. The project's timeline for completion is 20 years - is that a best-case scenario or are there issues that could cause this project to take longer to build? What is [sic] the project takes longer; what additional transportation mitigation measures would then take place?

Response to Comment No. 12-385F-1

The comment is the same as Comment No. 12-385A-21 above. Please refer to Response to Comment No. 12-385A-21, above.

Comment No. 12-385F-2

2. Is the City of Burbank and City of West Hollywood under any legal or moral obligation to do all or any of the recommended mitigation measures?

Response to Comment No. 12-385F-2

The comment is the same as Comment No. 12-385A-22 above. Please refer to Response to Comment No. 12-385A-22, above.

Comment No. 12-385F-3

3. What happens to the 101 freeway if Caltrans does not complete all of the recommended mitigation measures? Where does the State of California get the money to complete all recommended construction? How long will it take for the construction to be completed if the State of California only partially comes up with the ONE HUNDRED MILLION DOLLARS that is being projected to complete all 101-freeway construction? .Is there anything in Caltrans's [sic] current or future budget to construct everything that needs to take place to the 101-freeway for all mitigation measures?

Response to Comment No. 12-385F-3

The comment is the same as Comment No. 12-385A-23 above. Please refer to Response to Comment No. 12-385A-23, above.

Comment No. 12-385F-4

4. Since this project is being touted as a Transportation Oriented Development (TOD) does the heavier use of the Red Line significantly influence the already 250 million dollar operating deficit the Metro is currently experiencing. When does the Metro believe it will no longer be operating at a loss? Who covers the greater use of the Red Line costs -- the more the Red Line, Light Rail, Bus Rapid Transit (BRT) or other forms of Metro's public transportation are put into use the more the Metro and ultimately the taxpayer lose money. My question is, if this project touts the additional usage of the Red Line will NBC Universal, Comcast or whatever entity owns the development cover the additional expense of the Red Line?

Response to Comment No. 12-385F-4

The comment is the same as Comment No. 12-385A-24 above. Please refer to Response to Comment No. 12-385A-24, above.

Comment No. 12-385F-5

5. What is the maximum daily capacity of the Red Line? Can additional cars be added to it and if so, who pays for that cost? Can adding additional tunnels or light rail to handle additional riders expand the Red Line and if so, who covers those costs?

Response to Comment No. 12-385F-5

The comment is the same as Comment No. 12-385A-25 above. Please refer to Response to Comment No. 12-385A-25, above.

Comment No. 12-385F-6

6. How many riders are projected for the Red Line each year during construction and when the project is completed. This would projected ridership for all phases of construction. Are construction workers included in these numbers?

Response to Comment No. 12-385F-6

The comment is the same as Comment No. 12-385A-26 above. Please refer to Response to Comment No. 12-385A-26, above.

Comment No. 12-385F-7

7. What specifically is Universal going to do to make employees and guests use the Red Line, buses, Carpools, Vanpools, Telecommuting or other forms of mitigation measures specifically mentioned in the DEIR to get people out of their cars. What are the incentives to make people get off congested roads and the 101 freeway?

Response to Comment No. 12-385F-7

The comment is similar to Comment No. 12-385A-27 above. Please refer to Response to Comment No. 12-385A-27.

Comment No. 12-385F-8

8. Who oversees and enforces all traffic mitigations? What happens if they are not completed? What is the time-frame for completion?

Response to Comment No. 12-385F-8

The comment is the same as Comment No. 12-385A-28 above. Please refer to Response to Comment No. 12-385A-28.

Comment No. 12-385F-9

9. In Studio City there is currently either proposed or under construction the Colfax Bridge, LA DWP Trunk Line Replacement Projects(s) and the Equinox Gym on Ventura Boulevard which will and are greatly affecting vehicular and pedestrian mobility - have any of these projects been factored into traffic counts or mitigation measures?

End General Comments and Questions.

Response to Comment No. 12-385F-9

The comment is the same as Comment No. 12-385A-30 above. Please refer to Response to Comment No. 12-385A-30.

Comment No. 12-385F-10

Section Two Page Number(s) Comments and Questions from the DEIR

- Page 54 P#1: When the term "unavoidable or significant impacts" are mentioned who then pays the cost to correct that problem? Is it the taxpayer? Is it Universal or a combination thereof? If the taxpayer then does the taxpayer receive any type of financial incentive such as a dividend check from NBC Universal if they are within 5 miles of the project? Will the City of Los Angeles out of the General Fund have to make all necessary traffic mitigation measures? What happens if the City of Los Angeles declares bankruptcy do those contracts related to traffic mitigation become invalid?

Response to Comment No. 12-385F-10

As described in Section IV.B.1.6.a of the Draft EIR and Chapter V of the Transportation Study for the NBC Universal Evolution Plan Environmental Impact Report (Gibson Transportation Consulting, Inc. and Raju Associates, Inc., March 2010) (the "Transportation Study"), the Project would mitigate its significant intersection impacts to less than significant at all but nine of the analyzed intersections, four of which are projected to operate at an acceptable Level of Service (Level of Service D or better). These nine intersections are located adjacent to the Project Site and, as noted in Chapter V of the Transportation Study, most have existing physical constraints that render mitigation infeasible to achieve a less than significant impact at these locations. Therefore, the Applicant has worked extensively with the Los Angeles Department of Transportation (LADOT) to develop a transportation mitigation program that accommodates the additional traffic from the Project.

Regarding the remaining significant and unavoidable intersection and freeway segment impacts, as described in Sections 15121(a) and 15362 of the *CEQA Guidelines*, an EIR is an informational document which will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." (Public Resources Code Section 21002.1(a).) "Each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves *whenever it is feasible to do so*." (Public Resources Code Section 21002.1(b) (emphasis added).) If economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment, the project may still be approved at the discretion of the public agency. (Public Resources Code Section 21002.1(c).)

In approving a project which will result in the occurrence of significant effects which are identified in the final EIR but not avoided or substantially lessened, the lead agency must state the specific reasons to support its action in a statement of overriding considerations. The decision whether to approve the Project and adopt a statement of overriding considerations will be made by the decision-makers consistent with CEQA.

Comment No. 12-385F-11

- Page 54 P#2: With furloughs and layoffs significantly impacting the Los Angeles Department of Transportation (LADOT) where do they get the resources and manpower to ensure all traffic mitigation measures before, during and after construction are completed?

Response to Comment No. 12-385F-11

The comment is substantially the same as Comment No. 12-284, above. The commenter is referred to Response to Comment No. 12-284.

Comment No. 12-385F-12

- Page 58 (A): Sharing of Mitigation Measures - if mitigation measures are shared then why are there two separate DEIR's?

Response to Comment No. 12-385F-12

The commenter is referred to Response to Comment No. 12-14, above, regarding the sharing of mitigation measures. Please also refer to Topical Response No. 3 Defining

the Proposed Project (see Section III.C, Topical Responses, of the Final EIR) regarding the Metro Universal project.

Comment No. 12-385F-13

- Page 67 Mitigation B-22: Does Caltrans have the money in their budget currently or in the future to determine if a signal is required? Do either Caltrans or LADOT have the money and resources to study the proposed traffic signal study?

Response to Comment No. 12-385F-13

The commenter is referred to Response to Comment No. 12-173, above, regarding implementation of Mitigation Measure B-22.

Comment No. 12-385F-14

- Page 68 Mitigation B-27, B-28, B-29, B-30, B-31, B-33, B-34, B-35, B-36, B-37 and B-38: What if the City of Burbank does not have the money in their current or future budgets to implement the above mitigations? What if the City of Burbank refuses to have their Traffic Signal Interconnect and Signal Timing System and their Citywide Signal Control System interfaced with this proposed project.

Response to Comment No. 12-385F-14

The Project would be required to implement all applicable transportation project design features and mitigation measures required as part of the Project's approvals.

As noted in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, the Project has worked with the City of Burbank in development of the analysis and mitigation measures for intersections within the City of Burbank. As noted in the City of Burbank's comments on the Draft EIR, the City of Burbank requests improvements to inter-jurisdictional traffic signal coordination. The commenter is also referred to Response to Comment No. 12-306, above, regarding implementation of mitigation measures within other jurisdictions.

Comment No. 12-385F-15

- Page 73 (E): What alternate routes are being suggested for motorists? It's not said in the DEIR of any specific routes. Hollywood is a world-renowned tourist destination and drivers could use specific routes and direction to popular destinations within the Hollywood Event Management Infrastructure. This specificity would cut down on vehicular congestion, smog, increase air quality and reduce carbon emissions that lead to Global Warming.

Response to Comment No. 12-385F-15

The comment discusses traffic in Hollywood and appears to support the Hollywood Event Management Infrastructure that is a project design feature discussed on page 664 of the Draft EIR. The proposed signs would provide motorists on arterial streets leading to Hollywood from other parts of the region with advance information and warning regarding lane closures due to events in Hollywood, accidents, etc. The alternative routes that could be used would depend on the affected streets, as identified in the signs at the time.

Comment No. 12-385F-16

- Page 74 Mitigation B-40: Who enforces construction workers not parking in adjacent neighborhoods like Studio City?

Response to Comment No. 12-385F-16

Section IV.B.1. Traffic/Access - Traffic/Circulation, of the Draft EIR includes the following mitigation measure regarding construction worker parking:

> **Mitigation Measure B-40:** All construction workers shall be prohibited from parking on neighborhood streets offsite. To the extent that parking would not be available on-site, parking shall be provided by the Applicant or its successor at offsite locations. A construction worker shuttle service shall be provided if an offsite parking lot is not within reasonable walking distance of the Project Site.

Each mitigation measure, including traffic-related measures, is assigned a monitoring agency and enforcement agency in the approved Mitigation, Monitoring, and Reporting Program.

Comment No. 12-385F-17

- Page 74-75 Mitigation B-41: Who enforces no construction traffic of any kind does not go into residential streets and the continued enforcement of no construction traffic or hauling not taking place on Ventura Boulevard? The Ventura Boulevard Cahuenga Specific Plan prohibits construction hauling and truck traffic.

Response to Comment No. 12-385F-17

Each mitigation measure as part of the Project's approvals, including traffic-related measures, is assigned a monitoring agency and enforcement agency in the approved Mitigation, Monitoring, and Reporting Program. Regarding hauling on Ventura Boulevard, the commenter is referred to Response to Comment No. 12-202, above.

Comment No. 12-385F-18

- Page 45: Please explain the words, "substantial inconvenience to auto travelers?"

Response to Comment No. 12-385F-18

The comment is substantially the same as Comment No. 12-143, above. The commenter is referred to Response to Comment No. 12-143.

Comment No. 12-385F-19

- Page 46: What study or criteria are used for projecting traffic to the year 2030?

Response to Comment No. 12-385F-19

As explained in detail in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR and Appendix E-1 to the Draft EIR, a detailed travel demand forecasting model was developed for the traffic study area using the Southern California Association of Governments Regional Transportation Plan 2004 Transportation model and the City's General Plan Framework model as the base.

Comment No. 12-385F-20

- Page 47: Half of the 148 signalized study intersection would be significantly impacted - does this include the City of Burbank?

Response to Comment No. 12-385F-20

As explained in detail in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, there are 28 analyzed intersections in the City of Burbank, six of which are also under the jurisdiction of Caltrans. Of these intersections, eight intersections would experience a significant intersection level of service impact, seven of which can be mitigated to less than significant levels with implementation of the project design features and mitigation measures identified in Section IV.B.1. As stated on pages 693-694 of the Draft EIR, one intersection (Olive Avenue & Warner Brothers Studios Gate 2/Gate 3) would have residual significant and unavoidable impacts even with implementation of the project design features and mitigation measures identified in Section IV.B.1.

Comment No. 12-385F-21

- Page 48: Under the section TRANSIT ANALYSIS who pays for the additional transit trips if the Metro already operates at a 250-275 million dollar loss?

Response to Comment No. 12-385F-21

An analysis of the Project's potential transit system capacity impacts is included in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR. As explained in more detail on pages 631–632 of the Draft EIR, based on average load factors in the morning and afternoon peak hours in the Project vicinity shown on Table 25 on page 755 of the Draft EIR, there is residual capacity in the Metro Red Line to accommodate the transit riders generated by the Project. In addition, generally an increase in ridership on an underutilized transit system will decrease operating losses rather than increase them. The comment is noted and has been incorporated into the Final EIR for the review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385F-22

- Page 50: Construction; why are there 2 DEIR's and not one if the projects occur at the same time?

Response to Comment No. 12-385F-22

The comment appears to be referring to the preparation of an EIR for the Project and the preparation of an EIR for the Metro Universal project. Please see Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, of the Final EIR), regarding the Metro Universal project.

Comment No. 12-385F-23

- Page 50: Where does the City of Los Angeles and Caltrans get the money for additional roadway improvements?

Response to Comment No. 12-385F-23

The Project would be required to implement all of the applicable transportation project design features and mitigation measures, as described in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR. The commenter is also referred to Response to Comment No. 12-385F-11 and Topical Response No. 6: Freeway Improvements (see Section III.C, Topical Responses, of this Final EIR).

Comment No. 12-385F-24

- Page 52 Neighborhood Intrusion and Project Access: Why is it acceptable to the City of Los Angeles to have significant and unavoidable intrusions into Studio City neighborhoods?

Response to Comment No. 12-385F-24

As discussed on pages 682–683 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, with the proposed project design features, five of the nine potentially impacted neighborhoods would still be subject to potential neighborhood intrusion impacts. The five potentially impacted neighborhoods are shown in Figure 82 on page 919 of the Draft EIR and do not include areas in Studio City. Mitigation Measure B-42 is recommended to provide for the development of neighborhood traffic management plan(s) in the five potentially affected areas. However, as discussed in Topical Response No. 7: Neighborhood Intrusion (see Section III.C, Topical Responses, of this Final EIR), because it is possible that a significant impact may occur and that one or more neighborhoods might determine that it does not want to implement the mitigation actions, it is not possible to determine now whether such a potential neighborhood intrusion impact would be fully mitigated were it to occur. Accordingly, the Draft EIR conservatively concluded that with the identified mitigation the potentially significant impact would not be fully mitigated.

Also refer to Response to Comment No. 12-142, above.

Comment No. 12-385F-25

- Page 53 Supplemental Caltrans Analysis: This could result in significant cumulative impacts at the analyzed freeway segments - will Caltrans contribute the money and time for construction to alleviate these problems?

Response to Comment No. 12-385F-25

The comment raises issues similar to issues raised in Comment No. 12-227, above. The commenter is referred to Response to Comment No. 12-227 regarding the Supplemental Caltrans Analysis.

Comment No. 12-385F-26

- Page 54: Why would LADOT and the City of Los Angeles allow significant impact or impacts to remain?

Response to Comment No. 12-385F-26

The comment raises issues similar to issues raised in Comment No. 12-5, above. The commenter is referred to Response to Comment No. 12-5 regarding significant and unavoidable impacts.

Comment No. 12-385F-27

- Page 58 (A) iii Mitigation Measures (Sharing of them with Metro Project): Who exactly does what traffic mitigation measures if they are shared? The DEIR does not state the specifics.

Response to Comment No. 12-385F-27

The potential sharing of traffic mitigation measures is discussed on page 665 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, and in the City of Los Angeles Department of Transportation's Assessment Letter dated April 2, 2010 (see Appendix E-2 of the Draft EIR).With regard to the Metro Universal project, the commenter is referred to Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, of this Final EIR). See also Response to Comment No. 12-14 above.

Comment No. 12-385F-28

- Page 71 Mitigation Measure B-39: What is the traffic threshold to warrant a new signal? Why won't it be installed now if there will be a significant project impact until one is installed?

Response to Comment No. 12-385F-28

The California Manual on Uniform Traffic Control Devices and the California Traffic Manual both list traffic signal warrants that serve as the criteria for determining whether or not a traffic signal is the appropriate traffic control device for an intersection. The warrants consider traffic volumes, pedestrian flows, accident history, and speed limits to measure the applicability of a traffic signal at a particular location.

As with other transportation mitigation measures, required signal improvements would be implemented pursuant to the approved transportation mitigation subphasing program. The comment incorrectly states that the Project would cause a significant traffic impact prior to the installation of the traffic signal mitigation.

As noted in the City of Los Angeles Department of Transportation's Assessment Letter dated April 2, 2010 (see Appendix E-2 of the Draft EIR):

> "Prior to the issuance of any building permit for each sub-phase, all on- and off-site mitigation measures for the sub-phase shall be complete or suitably guaranteed to the satisfaction of LADOT."
>
> and

> "Prior to the issuance of any temporary or permanent Certificate of Occupancy in the final sub-phase, all required improvements in the entire mitigation phasing plan shall be funded, completed, or resolved to the satisfaction of LADOT."

Consistent with the Los Angeles Department of Transportation Assessment Letter, the proposed City and County Specific Plans provide that prior to issuance of the approval for a Project under the Specific Plan, the Department of Transportation assign traffic improvements, if any, to the Project from the approved Traffic Mitigation Phasing Plan. Further, the proposed City Specific Plan requires that prior to the issuance of a building permit for a Project under the City Specific Plan, the Applicant shall guarantee, to the satisfaction of the Department of Transportation, the construction of any required traffic improvements for the Project (See Section 7.2 of the proposed Universal City Specific Plan included as Appendix A-1 of the Draft EIR). Similarly, the proposed County Specific Plan requires that prior to the issuance of a building permit for a Project, the Applicant provide documentation satisfactory to the County Regional Planning Director that the Applicant has guaranteed the construction of the required traffic improvements to the satisfaction of the City of Los Angeles Department of Transportation. (See Section 14 of the proposed Universal Studios Specific Plan included as Appendix A-2 of the Draft EIR).

Comment No. 12-385F-29

- Page 73: What is the Hollywood Event Management Infrastructure?

Response to Comment No. 12-385F-29

The Hollywood Event Management Infrastructure is a system of changeable message signs that provide motorists with advance information regarding street closures that assist motorists in choosing alternative routes of travel. Alternative routes can be selected early thus avoiding long delays and preventing further congestion in the affected area. As noted in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR and the Los Angeles Department of Transportation's Assessment Letter (attached as Appendix E-2 to the Draft EIR), the Project proposes to fund the design and installation of up to five changeable message signs as part of the Hollywood Event Management Infrastructure.

Comment No. 12-385F-30

- Page 77: Weaving What constitutes a "fair share contribution?"

Response to Comment No. 12-385F-30

Fair-share contributions are a proportional cost toward the improvement to mitigate a project's traffic impacts. In the case of the Supplemental Caltrans Weaving Analysis, as set forth in Mitigation Measure B-47 (Mitigation Measure B-44 in the Draft EIR), the fair-share contribution shall be determined by Caltrans.

Comment No. 12-385F-31

- Page 84: Why is it acceptable to have 6 freeway segments on the 101 South Freeway and 170 be left with significant impacts? Who pays to alleviate that additional freeway congestion because of this project?

Response to Comment No. 12-385F-31

With regard to significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above. With regard to freeway improvements, the commenter is referred to Topical Response No. 6: Freeway Improvements (see Section III.C, Topical Responses, of this Final EIR).

Comment No. 12-385F-32

- Page 255: Why is it acceptable to be left with significant and unavoidable impacts?

Response to Comment No. 12-385F-32

With regard to significant and unavoidable impacts, the commenter is referred to Response to Comment Nos. 12-5 and 12-7, above.

Comment No. 12-385F-33

- Page 257 (2) Operations (i) Roadway Intersection: Intersections 22, 23, 29, 30, 33, 35, 36, 73, 82 - if the City of Los Angeles permit process can't be completed then a significant impact or impacts remain then why is the project allowed to go forward? With AB 32 The Global Warming Solutions Act this means not only will traffic be worse but noise, air quality, solid waste and off-site mitigation measures also grow worse and under AB 32 this is against the law.

Response to Comment No. 12-385F-33

As explained on pages 690–691 of the Draft EIR, with implementation of the project design features and mitigation measures, significant and unavoidable impacts would remain at the nine intersections identified in the comment. With regard to significant and

unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above. Please also refer to Draft EIR Sections IV.C, Noise; IV.H, Air Quality; and IV.L.3 Utilities – Solid Waste, of the Draft EIR for analyses related to noise, air quality, and solid waste, respectively. The environmental impacts of the Project's off-site traffic impacts are addressed in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR.

There are no provisions within Assembly Bill 32 that state that a project that has traffic, noise, air quality, or other impacts would be in violation of any law. As explained in more detail in Section IV.O, Climate Change, of the Draft EIR, with implementation of the proposed project design features, emission reduction features, and Transportation Demand Management Program, Project impacts with regard to climate change would be less than significant.

Comment No. 12-385F-34

- Page 259 (v) Supplemental Caltrans Analysis: Where does Caltrans get the money for their part(s) of the mitigation measures?

End Section Two Specific Comments and Questions

Response to Comment No. 12-385F-34

With regard to the Supplemental Caltrans Analysis, please refer to Response to Comment No. 12-385F-30, above. Please also refer to Response to Comment No. 12-385F-23, above, and Topical Response No. 6: Freeway Improvements (see Section III.C, Topical Responses, of this Final EIR).

Comment No. 12-385F-35

Section Three: Appendix E-2 LADOT Assessment Letter

- Page 3 (C). Traffic Oriented Development (TOD): How does a project that produces over 36,000 vehicles trips a day promote TOD and conform to AB 32?

Response to Comment No. 12-385F-35

The comment is substantially the same as Comment No. 12-279, above. The commenter is referred to Response to Comment No. 12-279.

Comment No. 12-385F-36

- Page 5 Part II. Project Transportation Mitigation Program: "no feasible mitigation measures were identified," why is that phrase acceptable under CEQA and AB 32?

Response to Comment No. 12-385F-36

The comment is substantially the same as Comment No. 12-285, above. The commenter is referred to Response to Comment No. 12-285.

Comment No. 12-385F-37

- Page 5 (A): What specific, "inherent incentives" are being provided for employees, visitors and tenants?

Response to Comment No. 12-385F-37

The comment is substantially the same as Comment No. 12-289, above. The commenter is referred to Response to Comment No. 12-289.

Comment No. 12-385F-38

- Page 6: Will the TDM Program include everything listed? Especially GUARANTEED ride home program and IRS Code 132(f) for pre-tax dollar transit commute expense accounts?

Response to Comment No. 12-385F-38

The comment is substantially the same as Comment No. 12-291, above. The commenter is referred to Response to Comment No. 12-291, above.

Comment No. 12-385F-39

- Page 12: What happened to an East-West road as originally proposed?

Response to Comment No. 12-385F-39

The comment is substantially the same as Comment No. 12-297, above. The commenter is referred to Response to Comment No. 12-61.

Comment No. 12-385F-40

- Page 28 Conclusions: Eight unmitigated traffic impacts are mentioned; why is that acceptable?

Response to Comment No. 12-385F-40

As explained on pages 690–691 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, with implementation of the project design features and mitigation measures, significant and unavoidable impacts would remain at nine intersections. The commenter is referred to Response to Comment No. 12-5, above, regarding significant and unavoidable impacts.

Comment Letter No. 12-385G

Comment No. 12-385G-1

Lisa:

I have some thoughts on Universal.

I know your team is spending tons of time dealing with notes and commentary on the EIR.

But I was thinking that we should also be taking a longer term view of the Universal project. As you know every 10 or so years they come up with a revision. The billion dollar price tag is a business and economic decision for the company that keeps getting bought and sold.

I think we need to see if anyone can tell us what this project does to the “bottom line”

I would also volunteer to organize another sub group to collect information. I am thinking that SC needs to think in “big terms” what it is that we want to preserve

1. Green space
2. Traffic circulation
3. Specific “doable” quality of life issues.. that we can name

Then we need to see if for example they will give us a greenbelt that is permanent. Maybe they can create a non-profit to hold the golf course.. Yes I am talking big thinking. What do we want protected?

Then I think a listening tour should have some contact with Burbank which is another town over run with show biz.. maybe Anaheim adjacent to Disneyland.. to find out the good, the bad and the better ideas based on experience.

My census stats show that locals communte [sic].. not what we expected... that taints the use local talent... we need to expect traffic....

I also think we need to talk with businesses... they will allocate areas for shops that will make out Village area a Dead Zone

Would be more accepting if there was a tax credit for hiring with X miles for the employee... or the employer... They think big, hoping to have the city absorb all the infrastructure expenses ... AND they have the 800 gorilla power to change city and county lines, so this stuff that we come up with may be a real possibility.

We should be looking at a position of how to make this work for us... I think we know that some of it will come to fruition.. what can we do to make it work for us... ??

Another point---Equinox s gone from our radar.. but I am betting that the new owner is not gone from Kerkorian's radar.. what is he asking around for???

I know we'll have a busy agenda and don't want to side track you from the immediate task at hand. Joann

Response to Comment No. 12-385G-1

The comment does not include comments on the environmental analysis of the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 12-385H

STAKEHOLDER COMMENTS & QUESTIONS

NBC UNIVERSAL EVOLUTION PLAN

Name: Yuval Ron
Address: 12400 Ventura Blvd., Suite 1025, Studio City, CA 91604

Comment No. 12-385H-1

May we use it? no

Email Address yuval@yuvalronmusic.com

The comments and questions will be submitted to the City Planning Department and be included in the SCNC response to the Draft Environmental Impact Report

We strongly object for proposed NBC Universal Evolution Plan as it may result in 36,000 additional car trips into the Studio City area with little to no traffic mitigations. Together, with the 2,937 unit residential district on the back lot this plan would lower the quality of life in Studio City, will lower the value of our property, will increase the pollution and strain on the natural environment and infrastructure of Studio City. PELASE [sic] STOP THIS AND ANY

OTHER LARGE DEVELOPMENTS in Studio City. WE, the residents, the people who vote, do NOT want these developments in our little Studio City.

Please listen!

Response to Comment No. 12-385H-1

The comment expresses opposition to the Project. Regarding traffic impacts, please refer to Section IV.B.1, Traffic/Access-Traffic/Circulation of the Draft EIR. There are a total of 44 mitigation measures recommended related to traffic and circulation impacts, which are listed and discussed in the Draft EIR. Regarding Air Quality, please refer to Section IV.H, Air Quality of the Draft EIR.

With regard to the implication of potential impacts of the Project on property values, the comment does not raise any environmental issues.

Quality of life is a term that is not defined in CEQA. If, by "quality of life" the commenter means "personal satisfaction (or dissatisfaction) with the cultural or intellectual conditions under which [one]/live[s] (as distinct from material comfort),"[34] quality of life is not an environmental topic addressed under CEQA. Environmental issues set forth under DEQA (e.g., traffic, land use, air quality, etc.) are addressed throughout, the Draft EIR analyzes the potential environmental impacts of the Project. Project design features and mitigation measures are recommended which reduce the Project's significant environmental impacts to the extent feasible.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 12-385I

Date: Wednesday, January 26, 2011 243 PM
From: dfrady@roadrunner.com
To: hippolady@roadrunner.com
Subject: Re NBC Universal Evolution Plan

Comment No. 12-385I-1

Our comment is simple. There is too much traffic and the variances that the City Council always gives to the builders just makes a bigger mess.

---

[34] *Website http://dictionary.reference.com/browse/quality+of+life?s=t.*

--Carol or Dennis Frady

Response to Comment No. 12-385I-1

The comment expresses opposition to the Project. Regarding traffic impacts, please refer to Section IV.B.1, Traffic/Access-Traffic/Circulation of the Draft EIR. There are a total of 44 mitigation measures required related to traffic and circulation impacts, which are listed and discussed in the Draft EIR.

Comment No. 12-385I-2

hippolady@roadrunner.com wrote

Dear Neighbors –

I'm sure you have heard about the proposed NBC Universal Evolution Plan and it 20 year construction window. It proposes to bring more than 36,000 car trips into the Studio City area with little to no traffic mitigations. Also, proposed is a 2,937 unit residential district on the backlot which will be entirely within the limits of the City of Los Angeles.

The city will be responsible for all services and infrastructure.

If you want to learn more, please go to www.scnc. info and clink on the Draft Environmental Impact Report link.

Attached is a comment form which must be submitted by February 4, 2011. Please write any question you would like answered by the developer and email it to me or fax it to (818) 980-1011.

This is just the first process. Public hearings will begin after the Final Environmental Impact Report is published.

Thank you for your support. Lisa

Response to Comment No. 12-385I-2

Regarding traffic impacts, please refer to Section IV.B.1, Traffic/Access-Traffic/ Circulation of the Draft EIR. There are a total of 44 mitigation measures required related to traffic and circulation impacts, which are listed and discussed in the Draft EIR. With regard to public services and infrastructure, as discussed in the Draft EIR, the Project would provide various utility, stormwater, and roadway infrastructure improvements as project design features or mitigation measures (see, for example, Section IV.B.1, Traffic/Access – Traffic/Circulation; Section IV.G.1.a, Water Resources – Surface Water – Drainage; Section IV.L.1, Utilities – Sewer; and Section IV.L.2, Utilities – Water).

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 12-385J

Date: Wednesday, January 26,2011 1040 PM
From: John A. Mozzer jamworks@earthlink.net
To: sczo@roadrunner.com
Subject: Re NBC Universal Evolution Plan

Comment No. 12-385J-1

I wonder what Comcast thinks about it.

http//www.engadget.com/2011/01/18/fcc-approves-comcasts-purchase-of-nbc-justice-department-up-ne/

-----Original Message----

From: sezo@roadrunner.com
Sent: Jan 26, 2011.237 PM
To: sezo@roadrunner.com
Subject: NBC Universal Evolution Plan

Dear Neighbors

I'm sure you have heard about the proposed NBC Universal Evolution Plan and it 20 year construction window. It proposes to bring more than 36,000 car trips into the Studio City area with little to no traffic mitigations. Also, proposed is a 2,937 unit residential district on the backlot which will be entirely within the limits of the City of Los Angeles.

The city will be responsible for all services and infrastructure.

If you want to learn more, please go to www.scnc info and click on the Draft Environmental Impact Report link.

Attached is a comment form which must be submitted by February 4, 2011. Please write any question you would like answered by the developer and email it to me or fax it to (818) 980-1011.

This is just the first process. Public hearings will begin after the Final Environmental Impact Report is published.

Thank you for your support. Lisa

Response to Comment No. 12-385J-1

The comment contains correspondence and asks about Comcast's opinion on the Project. As such, this is not a comment addressing the environmental analysis in the Draft EIR, but it is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. See also Response to Comment No. 12-385I-2, above.

Comment Letter No. 12-385K

STAKEHOLDER COMMENTS & QUESTIONS

NBC UNIVERSAL EVOLUTION PLAN

Name: Toby and Cindy Northcote-Smith
Address: 4078 Kraft Ave, Studio City, CA 91604
Email Address: Tobyns@sbcglobal.net

Comment No. 12-385K-1

May we use it? Yes

The comments and questions will be submitted to the City Planning Department and be included in the SCNC response to the Draft Environmental Impact Report

Both my wife and I are opposed to the expansion of universal.

Our prime concerns are:

1. Increased congestion. Our roads are already too busy. Particularly Ventura Blvd. Laurel Canyon ect. [sic]

2. Stress on local infrastructure and shops. Trader Joes couldn't be any busier as it is.

3. Increased crime. There has been an increase in crime over the past few years. We believe this is as a result of the increased population density as a result of condo/apartment

4. Degraded Education. Our schools are already reaching capacity. LAUSD is at breaking point. The extra curriculum services that the parents organizations will struggle to maintain the current levels of support that keep property values and studio city what it is.

Response to Comment No. 12-385K-1

The comment expresses opposition to the Project and concern regarding traffic infrastructure, crime, and education. Regarding traffic, please refer to Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR. Regarding crime, please refer to Section IV.K.2, Public Services – Police, of the Draft EIR. Regarding schools, please refer to Section IV.K.3, Public Services – Schools, of the Draft EIR. As explained in the Draft EIR, the imposition of project design features and mitigation measures, impacts with regard to police and school services as well as all infrastructure systems, with the exception of traffic and solid waste, are reduced to less than significant levels. With regard to traffic and solid waste, mitigation measures are identified that reduce Project impacts to the extent feasible.

With regard to the implication of potential impacts of the Project on property values, the comment does not raise any environmental issues. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 12-385L

STAKEHOLDER COMMENTS & QUESTIONS

NBC UNIVERSAL EVOLUTION PLAN

Name: Lana Ford
Address: 4078 4377 Colfax Ave. #23
Email Address: Lana@Lanaford.com

Comment No. 12-385L-1

May we use it? Yes

The comments and questions will be submitted to the City Planning Department and be included in the SCNC response to the Draft Environmental Impact Report:

1. What is the forecast from Universal NBC/Comcast for the company's workforce grow during this time of development?

Response to Comment No. 12-385L-1

As discussed in the Draft EIR, it is estimated that the Project would add 5,193 new on-site jobs once Project buildout has occurred by the year 2030. Another 1,718 direct jobs in the immediate vicinity of the Project Site would be created due to new households

spending for goods and services. It is anticipated that approximately two-thirds (65.8 percent) of the net new jobs would be associated with film, television, and video-related production and management activities. The Project's entertainment, retail (including retail and community services in the Mixed-Use Residential Area), child care, and theme park jobs represent one-quarter of the net new jobs, and the new hotel jobs represent about eight percent of the Project's total number of net new on-site jobs. Please refer to Section IV.N.1, Employment, of the Draft EIR for a detailed explanation and analysis.

Comment No. 12-385L-2

2. What are the Responses/Recommendations from their corporate neighbors – Disney/ABC & Warner Brothers? And for that matter – CBS needs to be included as a Studio City corporate player in this too.

Response to Comment No. 12-385L-2

The comment asks about opinions of other corporations regarding the Project. As such, this comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 12-385M

STAKEHOLDER COMMENTS & QUESTIONS

NBC UNIVERSAL EVOLUTION PLAN

Name: Lana Ford
Address: 4078 4377 Colfax Ave. #23
Email Address: Lana@Lanaford.com

Comment No. 12-385M-1

May we use it? Yes

The comments and questions will be submitted to the City Planning Department and be included in the SCNC response to the Draft Environmental Impact Report:

Has there been any contact with the Tree People Association to join forces with lobbying for saving the Heritage Trees?

Response to Comment No. 12-385M-1

The comment does not address the environmental analysis in the Draft EIR, but it is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Regarding potential impacts to trees, the commenter is referred to Section IV.I, Biota, of the Draft EIR, which concludes that with the implementation of the project design features and mitigation measures described in Section IV.I, Biota, of the Draft EIR, impacts to biological resources, including trees, would be less than significant. It should also be noted that the tree surveys of the Project Site did not identify any protected heritage trees. (See Appendix K-2 to the Draft EIR.)

Comment Letter No. 12-385N

STAKEHOLDER COMMENTS & QUESTIONS

NBC UNIVERSAL EVOLUTION PLAN

Name: John and Linda Mattingly
Address: 11565 Dilling St., Studio City 91604
Email Address: lcmattingly@earthlink.net

Comment No. 12-385N-1

May we use it? Yes

The comments and questions will be submitted to the City Planning Department and be included in the SCNC response to the Draft Environmental Impact Report

We are fully supportive of the Universal development.

Thank you.

Response to Comment No. 12-385N-1

The comment expresses support for the Project. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 12-385O

Homeowners
of Encino

January 18, 2011

Jon Foreman – Senior City Planner
Los Angeles City Planning Department
200 N. Spring St. Room 601
Los Angeles, CA 90012
jon.foreman@lacity.org

Case No. ENV-2007-02S4-EIR, Clearinghouse Number2007071036 [sic]

PROJECT LOCATION 100 UNIVERSAL CITY PLAZA, UNIVERSAL CITY, CA 91608

Comment No. 12-385O-1

Proposed Project: The NBC Universal Evolution Plan (the "Project") includes the development of a 391-acre site in the east San Fernando Valley near the Cahuenga Pass (the "Project Site"). The Project, as proposed, would involve a net increase of 2.01 million square feet of new commercial development, including 500 hotel guest rooms and related hotel facilities. A total of 2,937 dwelling units would be developed. Implementation would occur pursuant to the development standards set forth in two proposed Specific Plans. The proposed Universal City Specific Plan addresses development within the portion of the Project Site located within the City of Los Angeles, whereas the proposed Universal Studios Specific Plan addresses development within the portion of the Project Site located under the jurisdiction of the County of Los Angeles. Portions of the Project Site that are currently in the County of Los Angeles would be annexed into the City of Los Angeles, while other areas would be detached from the City of Los Angeles and returned to the jurisdiction of the County of Los Angeles. The proposed annexation/detachment reflects the Applicant's objective to establish jurisdictional boundaries that follow existing and planned on-site land use patterns.

We object to the traffic, noise, congestion, infrastructure damage and pollution that the 2.01 million square feet of new commercial development including 500 hotel guest rooms and 2,937 dwelling units will bring to the San Fernando Valley, and the entire region. This massive amount of new development simply cannot be sustained by the existing infrastructure, regardless of the meager "mitigations" that are proposed.

We ask that the City and County reject the draft EIR for this project. The draft EIR prepared by Matrix Environmental is "authoritative" looking on the surface, but is grossly inadequate and fails in its findings. The draft EIR is devoid of meaningful mitigation measures and contains many flawed conclusions. The lengthy document obfuscates traffic, congestion and infrastructure problems while going on at length about tangential

matters and ignores mitigation measures that are required by CEQA. Throughout the draft EIR the preparer reaches faulty conclusions claiming impacts are reduced to "less than significant" when in reality the impacts are significant.

We ask that the City and County not approve any discretionary approvals, including annexation changes, zone changes, height district changes, vesting zone changes, general plan amendments, specific plan amendments, variances, exceptions or conditional use permits for this project. The project will create environmental problems that cannot be mitigated. We ask that you deny the applicant's requests described below:

We oppose the adoption of a Specific Plan to regulate development within the City portions of the Project Site; General Plan Amendment to Regional Commercial land use designation for the City portions of the Project Site; the removal of a small portion of the Project Site from the Mulholland Scenic Parkway Specific Plan; Zone Change and Code Amendment to effectuate the new Specific Plan; Tentative Tract Maps for mixed-use development (including residential condominiums with accompanying Development Design Guidelines); Development Agreement; Pre-Annexation Agreement; Haul Route Permit(s); Grading approvals; establishment of Community Facilities/Mello-Roos Districts and any additional actions that may be determined necessary.

We oppose the Applicant's request for the following discretionary approvals from the County of Los Angeles for those portions of the Project Site that are located within the unincorporated portions of Los Angeles County adoption of a Specific Plan to regulate development within the County portions of the Project Site; General Plan Amendments to establish a Specific Plan land use designation, delete an on-site road designation (the "East-West Road") as set forth in the County's General Plan Circulation Element and amend the Urban Form Policy Map to change the project site designation; Zone Change to effectuate the new Specific Plan; Tentative Tract Map; Grading Approvals; Development Agreement; and any additional actions that may be determined necessary.

We oppose the Applicant's request for modification to the City and County jurisdictional boundaries through a Petition for Reorganization application with the Local Agency Formation Commission (LAFCO) and an amendment to the City's sphere of influence.

Our members strongly oppose granting any annexations, zone changes, height district changes, vesting zone changes, general plan amendments, specific plan amendments, variances, exceptions or conditional use permits for this project. We ask that you deny the applicant's requests, based in part upon the following facts:

1. The proposed location will not be desirable to the public convenience or welfare and is not proper in relation to adjacent uses and development of the east San Fernando Valley.

The object here is to determine what is harmonious with the neighborhood and community, not what will maximize the Applicant's profits.

2. The uses will be materially detrimental to the character of the development in the immediate neighborhood, and other projects in the east San Fernando Valley. This project is totally out of scale with the adjacent community. The local roadway and circulation system cannot handle this massive increase in housing and commercial development.

3. The proposed location will not be in harmony with the various elements and objectives of the existing community plans. Exceptions, zone changes and variances are not needed to build on this property. Rather, this is a situation where the Applicant simply wants exceptions to the rules, to make this project more valuable, at a cost to the community. Benefits to this Applicant should not be the major determinant. Rather, the focus should be on this project's impact on the neighborhoods. Moreover, the Applicant was aware of all restrictions on this property when he purchased the property. He can build and use his property rights without the exceptions requested.

4. The project's location will adversely affect the traffic in the east San Fernando Valley and result in increased congestion. The proposed use will detrimentally impact traffic on the Hollywood Freeway, Barham Blvd., Cahuenga Pass and the surrounding street grid, an area already heavily congested. Adding thousands of new trips will make traffic even more unbearable throughout the day and evening. This section of the east Valley has many F level intersections and cannot handle increased trips.

5. Granting any of the Applicant's requests will have severe negative impacts on local residents, and others living in the San Fernando Valley. It would allow a massive amount of commercial and residential development that cannot be sustained by the local infrastructure.

On behalf of our members, and the thousands of San Fernando Valley residents that are daily impacted by noise, traffic and congestion, we ask that you not approve the discretionary actions that are requested.

Cordially yours,

Gerald A. Silver, President

Response to Comment No. 12-385O-1

The comment incorporates the entirety of a letter from the Homeowners of Encino, dated January 18, 2011, commenting on the Draft EIR, which is included as Comment Letter No. 52 to this Final EIR. Please refer to Response to Comments 52-1 through 52-4.

Comment Letter No. 12-385P

Rita C. Villa
Comments on the NBC Universal Evolution Plan
February 2, 2011

Comment No. 12-385P-1

My questions and comments will only be related to the 'Summary of Significant and Unavoidable Impacts' and 'Growth Inducing Impacts.'

Response to Comment No. 12-385P-1

The comment refers to the Sections VI and VII of the Draft EIR. Specific comments related to the Draft EIR are responded to below. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385P-2

The Studio City area is impacted by traffic and parking issues. There is minimal traffic circulation within this area. Adding the proposed Project, without mitigating all of the significant and unavoidable impacts will exacerbate the problem.

Response to Comment No. 12-385P-2

Regarding traffic, circulation, and parking, please refer to Sections IV.B.1, Traffic/ Access – Traffic/Circulation, and IV.B.2, Traffic/Access – Parking, of the Draft EIR. As explained in more detail in Section IV.B.2, with the implementation of the identified project design features and mitigation measures, Project impacts with regard to parking would be reduced to less than significant levels. With regard to traffic, mitigation measures are identified that reduce Project impacts to the extent feasible. With regard to significant and unavoidable impacts, the commenter is referred to Response to Comment No. 12-5, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385P-3

Studio City is the gateway to the San Fernando Valley and studies show that the 101, 134 and 170 freeways should have had additional lanes added to them since 1994. Direct interchanges to and from each of these freeways should be added. The Project's proposed shared mitigations with the Metro Universal Project will only create even more significant and unavoidable impacts. The Metro Universal Project DEIR included significant and

unavoidable impacts in the same locations as the NBC Universal Evolution Plan DEIR shows.

Response to Comment No. 12-385P-3

With regard to freeway improvements, please refer to Topical Response No. 6: Freeway Improvements (see Section III.C, Topical Responses, of this Final EIR). Further, regarding the sharing of mitigation measures, see Response to Comment No. 12-385F-27.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385P-4

Each of the noted significant and unavoidable impacts is unacceptable to the Studio City community. The project must be reduced in size to eliminate all significant and unavoidable impacts.

Response to Comment No. 12-385P-4

The commenter is referred to Response to Comment No. 12-5, above, with regard to significant and unavoidable impacts and alternatives analyzed. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385P-5

Recent development has doubled the number of rental and condo units in Studio City. Between 2005 and 2008, 600 plus units were added to the housing stock. Many of these units are unsold or not rented. There are more available units in Studio City than at any other time.

Response to Comment No. 12-385P-5

The comment refers to housing availability in Studio City. Please refer to Section IV.N.2, Housing, of the Draft EIR. As discussed in the section, the Project's proposed 2,937 dwelling units would provide about one percent of the growth in SCAG's household forecast for the City of Los Angeles Subregion between 2008 and 2030. The Project also represents about 10 percent of the households forecasted for the Southeast San Fernando Valley between 2008 and 2030, according to SCAG's regional growth forecast. This means that the housing units proposed fit within the growth projections of SCAG, and would not exceed housing demand. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385P-6

Studio City has a 'scrubber,' installed on Radford Avenue because of the over burden on the sewer system. We have been told that an additional 'scrubber' will be installed soon. What will the applicant install to improve the infrastructure in the Studio City area? Growth without infrastructure improvements is unacceptable. Additional housing is not needed in the Studio City area, commercial development is needed. Too many of the manufacturing and commercial properties have already been converted to residential use. The loss of revenue generating commercial and manufacturing properties must be stemmed. This proposed Project will not increase sewer capacity or create connections to previously unserved area? [sic]

Response to Comment No. 12-385P-6

The Project includes the following wastewater Project Design Features, as described in Section IV.L.1, Utilities – Sewer, of the Draft EIR:

Project Design Feature L.1-1: Prior to the development of a new building, the capacity of the on-site sewer lines serving the building shall be examined and replacement or new sewer lines shall be installed as necessary.

Project Design Feature L.1-2: Gauging stations shall be installed in the proposed sewer lines in the County areas of the Project Site for wastewater flows to pass through before entering a City-owned sewer.

Project Design Feature L.1-3: New sanitary sewers in the City areas of the Project Site shall be designed to conform to the standards of the City's Bureau of Sanitation. New sanitary sewers in the County areas of the Project Site shall be designed to conform to the standards of the County of Los Angeles Sanitation District. The Applicant or its successor shall construct the additional on-site sanitary sewer system improvements required to support the additional development per these standards.

With implementation of these design features, impacts related to sewer conveyance and treatment capacity would be less than significant. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

With regard to scrubbers, the commenter is referred to Response to Comment No. 12-19, above. With regard to housing, the commenter is referred to Response to Comment No. 12-385P-5, above.

Comment No. 12-385P-7

The proposed Project DEIR shows that students will be required to attend schools on the other side of the hill. There is already so much traffic on the streets leading over the hill that this is not feasible solution. [sic] Land for schools must be required to be set aside within the Project site. I specifically want to know where the filming currently taking place the back lot will be done in the future. [sic]

Response to Comment No. 12-385P-7

The Project's potential impacts on seating capacity in the LAUSD schools likely to serve new students resulting from the Project's residential uses is contained in Draft EIR Section IV.K.3, Public Services – Schools (pages 1750 et seq.), and Draft EIR Appendix M. The three schools evaluated in the Section are the three schools LAUSD identified as serving the Project Site; i.e., Valley View Elementary School, Bancroft Middle School, and Hollywood High School.

Using student generation rates provided by LAUSD, the Draft EIR concludes that the Project's residential units would generate approximately 319 elementary students, 1506 middle school students, and 161 high school students, or a total of 636 additional Los Angeles Unified School District students. (Draft EIR, Section IV.K.3, pages 1762–1763.) These numbers would exceed the current capacity of the identified schools by 132 elementary school students and 58 high school students. The Draft EIR concludes that when these enrollment demand impacts are compared with LAUSD projections of future enrollment and seating capacity in the relevant schools, one out of the three schools serving the Project Site, Valley View Elementary School, would be over capacity by the time Project buildout is achieved. As such, the Project would cause a significant impact to the capacity of this school, but not at Bancroft Middle School or Hollywood High School, where there is projected to be surplus seating after accommodating Project-generated students. (Draft EIR, Section IV.K.3, page 1762.)

Nevertheless, LAUSD is authorized under State law to levy a fee on the construction of the Project's new residential units, commercial development and parking structures for the purpose of funding the construction or reconstruction of school facilities. LAUSD's current fee is $3.87 per square foot of new residential floor area, $0.47 per square foot of non-residential development, and $0.09 per square foot of a parking structure. Therefore, requiring the mandatory payment of school fees in conformance with the Leroy F. Greene School Facilities Act of 1998, more commonly referred to as Senate Bill 50, would provide full and complete mitigation of school impacts for the purposes of CEQA. No additional mitigation is required. (Draft EIR, Section IV.K.3, pages 1765–1767.)

The comment asks where filming that currently occurs on the Back Lot Area would occur with implementation of the Project. The Project would still have a back lot in the Studio Area of the Project Site. It is anticipated that most filming would occur in the Studio Area. As noted in the Draft EIR's Project Description, among the Project's objectives are to: (1) expand entertainment industry and complimentary uses of the Project Site; and (2) maintain and enhance the site's role in the entertainment industry. (Draft EIR, Section II, Project Description, pages 275–276.) Accordingly, the Project includes a net increase of 307,949 square feet of studio facility floor area, resulting in a new total of 1,536,069 square feet, a net increase of 437,326 square feet of studio-related office space, for a new total of 1,379,871 square feet, and a net increase of 495,406 square feet of other support office space, for a new total of 958,836 square feet. (Draft EIR, Table 2, page 280.) Therefore, although under the proposed Project, substantial portions of the Back Lot Area would become the Mixed-Use Residential Area, there would not be a net loss of film and television production and support facilities. Rather, the Project would result in a net increase of 1,240,681 square feet of studio-related floor area, for a new total of 3,874,776 square feet.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385P-8

Court decisions have limited the reliance that can be places [sic] on the use of future estimates for growth and traffic. This DEIR relies heavily on the use of estimates many of which have been questioned by the City of Burbank as being understated. These calculations should be revised so that they are more realistic.

Response to Comment No. 12-385P-8

It is unclear to which growth and/or traffic estimates the comment refers. Please refer to Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR for an explanation of the methodology used in the traffic analysis.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385P-9

There are shortages of electricity and water throughout Southern California. Those resources are not endlessly renewable. The Project as proposed would place very heavy demands on resources that already being rationed. [sic] The City of Los Angeles should not accept the financial responsibility for the services required for the residential district

while giving up the revenue from the commercially zoned portions of the project that will result from the annexation and detachment proposed in the DEIR.

Response to Comment No. 12-385P-9

As explained in Section IV.L.4, Utilities – Electricity, of the Draft EIR, the Los Angeles Department of Water and Power has indicated that the existing electrical distribution system would need to be reinforced and a new distribution system would need to be installed for the City portion of the Project Site. Pursuant to Project Design Feature L.4.3, the existing Los Angeles Department of Water and Power 34.5 kV system would be reinforced, and a new distribution system would be added. In addition to these improvements, additional electrical lines would be installed both on and off the Project Site. These electrical lines may be added to existing above-ground electrical poles or may be undergrounded. (See Section IV.L.4, Utilities – Electricity, of the Draft EIR, pages 1936–1938.) Thus, although implementation of the proposed Project would result in increased electrical consumption and demand, with implementation of the project design features, Project impacts with respect to electricity would be less than significant. (See page 1954 of the Draft EIR.)

In addition, as noted in the Draft EIR, the Project includes energy conservation measures outlined in the Draft EIR. (See Project Design Features L.4-4 through L.4-11 on pages 1953–1954 of Section IV.L.4, Utilities – Electricity, of the Draft EIR.) The projection of the proposed Project's electrical consumption is conservative in that it does not account for the Project's incorporation of the energy conservation measures, which would decrease the proposed Project's electrical consumption. (See pages 1935–1936 of the Draft EIR.)

As discussed in Section IV.L.2, Utilities – Water, of the Draft EIR, in order to facilitate the DWP's long-term supply of potable water available to serve the Project, the Applicant would enter into an agreement with the DWP to augment the water supply available to the DWP. Pursuant to the agreement, the Applicant, at its expense, would provide DWP with water rights in the Central and/or West Coast Basins, or other reliable supply sources agreed to by the DWP, to offset new potable water demand within the City portions of the Project Site and, upon a declaration by the DWP General Manager, new potable water demand within the County. In addition, the DWP would increase the amount of reliable recycled water supply available to serve the Project Site. With the inclusion of the project design features, including the agreement with DWP to augment the water supply available to DWP, impacts of the proposed Project on water supply would be less than significant.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 12-385P-10

The Southeast Valley is suburban and not urban. This area is not a regional center. The proposed Project must be reduced in size. As proposed it will overtax the infrastructure and will further congest all aspects of the surrounding communities. It will significantly and adversely impact the quality of life in Studio City. The Project as proposed must not be allowed to proceed.

Response to Comment No. 12-385P-10

Regarding the use of the term "urban" in the Draft EIR, the commenter is referred to Response to Comment No. 12-4, which explains that the density in the Project area exceeds the population density used by the U.S. Census Bureau to define urban areas. For this reason, the term "urban" was used throughout the EIR as it refers to the Project area.

As explained in Sections IV.L.1 through IV.L.5 of the Draft EIR, with the imposition of project design features and mitigation measures, impacts with regard to utility infrastructure, with the exception of solid waste, are reduced to less than significant levels. With regard to solid waste, impacts would be significant and unavoidable due to existing and future regional constraints regarding available landfill capacity that affect virtually every major project in the area. With regard to transportation infrastructure, with the implementation of the project design features and mitigation measures, significant and unavoidable impacts would remain at nine intersections. The commenter is referred to Response to Comment No. 12-5 above regarding significant and unavoidable impacts..

Quality of life is a term that is not defined in CEQA. If, by "quality of life" the commenter means "personal satisfaction (or dissatisfaction) with the cultural or intellectual conditions under which [one]/live[s] (as distinct from material comfort),"[35] quality of life is not an environmental topic addressed under CEQA. Environmental issues set forth under DEQA (e.g., traffic, land use, air quality, etc.) are addressed throughout, the Draft EIR analyzes all of the potential environmental impacts of the Project. Project design features and mitigation measures are required which reduce the Project's significant environmental impacts to the extent feasible.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

---

[35] *Website http://dictionary.referenc*e.com/browse/quality+of+life?s=t.

Comment No. 12-386

See next page

TRANSPORTATION ATTACHMENTS

Response to Comment No. 12-386

Specific comments contained in the Attachment portion of the letter are provided and responded to below.

Comment No. 12-387

See next page

ATTACHMENT 1

Table 17
Analyzed Intersections

No.	Intersection	Jurisdiction
1	Colfax Avenue & Ventura Boulevard	City of Los Angeles
2	Kraft Avenue/SR 170 SB Off-Ramp & Riverside Drive	City of Los Angeles/Caltrans
3	Tujunga Avenue & Riverside Drive/Camarillo Street	City of Los Angeles
4	Tujunga Avenue & Ventura Boulevard	City of Los Angeles
5	Eureka Drive & Ventura Boulevard	City of Los Angeles
6	Lankershim Boulevard & Magnolia Boulevard	City of Los Angeles
7	Studio City Place & Ventura Boulevard	City of Los Angeles
8	Vineland Avenue & Magnolia Boulevard	City of Los Angeles
9	Vineland Avenue/Lankershim Boulevard & Camarillo Street	City of Los Angeles
10	Vineland Avenue & Riverside Drive	City of Los Angeles
11	Vineland Avenue & Moorpark Street	City of Los Angeles
12	Vineland Avenue & Whipple Street	City of Los Angeles
13	Vineland Avenue & US 101 NB Off-Ramp	City of Los Angeles/Caltrans
14	Vineland Avenue & Ventura Boulevard	City of Los Angeles
15 [a]	SR 134 EB On-Ramp e/o Vineland Avenue & Riverside Drive	City of Los Angeles/Caltrans
16	Plaza Parkway & Ventura Boulevard	City of Los Angeles
17	Riverton Avenue/Campo de Cahuenga Way & Ventura Boulevard	City of Los Angeles
18	Lankershim Boulevard & SR 134 WB Off-Ramp	City of Los Angeles/Caltrans
19	Lankershim Boulevard & Riverside Drive	City of Los Angeles
20	Lankershim Boulevard & Moorpark Street	City of Los Angeles
21	Lankershim Boulevard & Whipple Street	City of Los Angeles
22	US 101 NB Ramps & Campo de Cahuenga Way	City of Los Angeles/Caltrans
23	Metro Driveway & Campo de Cahuenga Way	City of Los Angeles
24	Cahuenga Boulevard & Magnolia Boulevard	City of Los Angeles
25	Cahuenga Boulevard & Huston Street	City of Los Angeles
26	Cahuenga Boulevard & Camarillo Street	City of Los Angeles
27	Cahuenga Boulevard & SR 134 WB Off-Ramp	City of Los Angeles/Caltrans
28	Cahuenga Boulevard & SR 134 EB Ramps	City of Los Angeles/Caltrans
29	Cahuenga Boulevard & Riverside Drive	City of Los Angeles
30	Cahuenga Boulevard & Moorpark Street	City of Los Angeles
31	Cahuenga Boulevard & Whipple Street	City of Los Angeles
32 [b]	Cahuenga Boulevard & Valley Spring Lane	City of Los Angeles
33	Lankershim Boulevard & Cahuenga Boulevard	City of Los Angeles
34	Lankershim Boulevard & Valleyheart Drive/James Stewart Avenue	City of Los Angeles/County of Los Angeles
35	Lankershim Boulevard & Main Street	City of Los Angeles/County of Los Angeles
36	Lankershim Boulevard & Campo de Cahuenga Way/ Universal Hollywood Drive	City of Los Angeles/County of Los Angeles
37	Lankershim Boulevard & US 101 NB Off-Ramp	City of Los Angeles/Caltrans
38 [c]	Lankershim Boulevard & Ventura Boulevard/Cahuenga Boulevard	City of Los Angeles

ATTACHMENT 1 PG 2

Table 17 (Continued)
Analyzed Intersections

No.	Intersection	Jurisdiction
39	US 101 SB Ramps/Regal Place & Cahuenga Boulevard	City of Los Angeles/Caltrans
40	Ledge Avenue/Moorpark Way & Riverside Drive	City of Los Angeles
41	Forman Avenue & Riverside Drive	City of Los Angeles
42	Broadlawn Drive & Cahuenga Boulevard	City of Los Angeles
43	Universal Center Drive/Universal Studios Boulevard & Buddy Holly Drive	City of Los Angeles/County of Los Angeles
44	Universal Studios Boulevard & Cahuenga Boulevard	City of Los Angeles
45	Oakshire Drive & Cahuenga Boulevard	City of Los Angeles
46	US 101 SB Ramps w/o Barham Boulevard/Cahuenga Boulevard & Cahuenga Boulevard	City of Los Angeles/Caltrans
47	Barham Boulevard & Cahuenga Boulevard	City of Los Angeles
48	Barham Boulevard & Buddy Holly Drive/Cahuenga Boulevard	City of Los Angeles
49	Oakcrest Drive & Cahuenga Boulevard	City of Los Angeles
50	Mulholland Drive & Cahuenga Boulevard	City of Los Angeles
51	Cahuenga Boulevard & Hillpark Drive	City of Los Angeles
52	Barham Boulevard & De Wilt Drive	City of Los Angeles
53	Barham Boulevard & Lake Hollywood Drive	City of Los Angeles
54	Barham Boulevard & Coyote Canyon Road	City of Los Angeles
55	Barham Boulevard & Lakeside Plaza Drive/Forest Lawn Drive	City of Los Angeles
56	Warner Brothers Studios Gate 7/Gate 8 & Forest Lawn Drive	City of Los Angeles
57	Memorial Drive & Forest Lawn Drive	City of Los Angeles
58	Mount Sinai Drive & Forest Lawn Drive	City of Los Angeles
59	Forest Lawn Drive & Zoo Drive	City of Los Angeles
60 [b]	Forest Lawn Drive & SR 134 EB Ramps	City of Los Angeles/Caltrans
61 [b]	Forest Lawn Drive & SR 134 WB Ramps	City of Los Angeles/Caltrans
62	Cahuenga Boulevard/Highland Avenue & Pat Moore Way/ US 101 On-Ramps	City of Los Angeles/Caltrans
63	Highland Avenue & Odin Street	City of Los Angeles
64	Highland Avenue & Camrose Drive	City of Los Angeles
65	Highland Avenue & Franklin Avenue	City of Los Angeles
66	Highland Avenue & Franklin Place/Franklin Avenue	City of Los Angeles
67 [b]	Odin Street & Cahuenga Boulevard	City of Los Angeles
68	Cahuenga Boulevard & US 101 NB Off-Ramp	City of Los Angeles/Caltrans
69	Cahuenga Boulevard & Franklin Avenue	City of Los Angeles
70	Cahuenga Boulevard & Hollywood Boulevard	City of Los Angeles
71	Vine Street & Franklin Avenue/US 101 SB Off-Ramp	City of Los Angeles/Caltrans
72 [b]	Lankershim Boulevard & Muddy Waters Drive	City of Los Angeles/County of Los Angeles
73 [b]	Lankershim Boulevard & Jimi Hendrix Drive	City of Los Angeles/County of Los Angeles
74	Pass Avenue & Magnolia Boulevard	City of Burbank
75	Pass Avenue & Verdugo Avenue	City of Burbank

ATTACHMENT 1 PG 3

Table 17 (Continued)
Analyzed Intersections

No.	Intersection	Jurisdiction
76	Pass Avenue & Oak Street	City of Burbank
77	Evergreen Street/Riverside Drive & Alameda Avenue	City of Burbank
78	Pass Avenue & SR 134 EB Off-Ramp	City of Burbank/Caltrans
79	Pass Avenue & Alameda Avenue	City of Burbank
80	Pass Avenue & Riverside Drive	City of Burbank
81	Olive Avenue & Pass Avenue	City of Burbank
82	Olive Avenue & Warner Brothers Studios Gate 2/Gate 3	City of Burbank
83	Olive Avenue & Warner Brothers Studios Gate 1/Lakeside Drive	City of Burbank
84	Hollywood Way & Alameda Avenue	City of Burbank
85	Cordova Street/SR 134 WB Off-Ramp & Alameda Avenue	City of Burbank/Caltrans
86	Hollywood Way & Olive Avenue	City of Burbank
87	Olive Avenue & Riverside Drive	City of Burbank
88	Lima Street & Olive Avenue	City of Burbank
89	Olive Avenue & Alameda Avenue	City of Burbank
90	California Street & Riverside Drive	City of Burbank
91	Bob Hope Drive & Alameda Avenue	City of Burbank
92	Buena Vista Street & Alameda Avenue	City of Burbank
93	Buena Vista Street/SR 134 EB On-Ramp & Riverside Drive/ SR 134 WB Ramps	City of Burbank/Caltrans
94 [c]	SR 134 EB On-Ramp/Screenland Drive & Riverside Drive	City of Burbank/Caltrans
95	Buena Vista Street & Olive Avenue	City of Burbank
96 [c]	Sepulveda Boulevard & Ventura Boulevard	City of Los Angeles
97	Doble Avenue & Ventura Boulevard	City of Los Angeles
98	Kester Avenue (West) & Ventura Boulevard	City of Los Angeles
99	Willis Avenue & Ventura Boulevard	City of Los Angeles
100	Cedros Avenue (West) & Ventura Boulevard	City of Los Angeles
101	Cedros Avenue (East) & Ventura Boulevard	City of Los Angeles
102	Van Nuys Boulevard & Ventura Boulevard	City of Los Angeles
103	Tyrone Avenue/Beverly Glen Boulevard & Ventura Boulevard	City of Los Angeles
104	Hazeltine Avenue (West) & Ventura Boulevard	City of Los Angeles
105	Stern Avenue (West) & Ventura Boulevard	City of Los Angeles
106 [c]	Woodman Avenue & Ventura Boulevard	City of Los Angeles
107	Sunnyslope Avenue & Ventura Boulevard	City of Los Angeles
108	Dixie Canyon Avenue & Ventura Boulevard	City of Los Angeles
109	Fulton Avenue & Ventura Boulevard	City of Los Angeles
110	Valley Vista Boulevard/Royal Avenue & Ventura Boulevard	City of Los Angeles
111	Coldwater Canyon Avenue & Ventura Boulevard	City of Los Angeles
112	Whitsett Avenue/Laurel Terrace Drive & Ventura Boulevard	City of Los Angeles
113	Laurelgrove Avenue & Ventura Boulevard	City of Los Angeles

ATTACHMENT 1 PG 4

Table 17 (Continued)
Analyzed Intersections

No.	Intersection	Jurisdiction
114	Vantage Avenue & Ventura Boulevard	City of Los Angeles
115 [c]	Laurel Canyon Boulevard & Ventura Boulevard	City of Los Angeles
116	Radford Avenue/Ventura Place & Ventura Boulevard	City of Los Angeles
117 [a]	US 101 SB On Ramp n/o Lankershim Boulevard & Ventura Boulevard	City of Los Angeles/Caltrans
118	Lankershim Boulevard/Tujunga Avenue & Burbank Boulevard	City of Los Angeles
119	Vineland Avenue & Burbank Boulevard	City of Los Angeles
120	Cahuenga Boulevard & Burbank Boulevard	City of Los Angeles
121	Cahuenga Boulevard & Chandler Boulevard	City of Los Angeles
122	La Cienega Boulevard & Sunset Boulevard	City of West Hollywood
123 [c]	La Cienega Boulevard & Santa Monica Boulevard	City of West Hollywood
124	Laurel Canyon Boulevard & Hollywood Boulevard	City of Los Angeles
125	Crescent Heights Boulevard & Sunset Boulevard	City of Los Angeles
126	Fairfax Avenue & Hollywood Boulevard	City of Los Angeles
127	Fairfax Avenue & Sunset Boulevard	City of Los Angeles
128	La Brea Avenue & Franklin Avenue	City of Los Angeles
129	La Brea Avenue & Hollywood Boulevard	City of Los Angeles
130	La Brea Avenue & Sunset Boulevard	City of Los Angeles
131	La Brea Avenue & Fountain Avenue	City of West Hollywood/City of Los Angeles
132	La Brea Avenue & Santa Monica Boulevard	City of West Hollywood
133	Highland Avenue & Hollywood Boulevard	City of Los Angeles
134	Highland Avenue & Sunset Boulevard	City of Los Angeles
135	Highland Avenue & Fountain Avenue	City of Los Angeles
136 [c]	Highland Avenue & Santa Monica Boulevard	City of Los Angeles
137	Kester Avenue (East) & Ventura Boulevard	City of Los Angeles
138	San Vicente Boulevard/Clark St & Sunset Boulevard	City of West Hollywood
139	Cahuenga Boulevard & Sunset Boulevard	City of Los Angeles
140	Lankershim Boulevard & Chandler Boulevard (North)	City of Los Angeles
141	SR 170 SB Ramps & Magnolia Boulevard	City of Los Angeles/Caltrans
142	SR 170 NB Ramps & Magnolia Boulevard	City of Los Angeles/Caltrans
143 [a]	Tujunga Avenue & SR 170 NB On-Ramp/Private Driveway	City of Los Angeles/Caltrans
144	Coldwater Canyon Avenue & US 101 NB Ramps	City of Los Angeles/Caltrans
145	Coldwater Canyon Avenue & US 101 SB Ramps	City of Los Angeles/Caltrans
146	Coldwater Canyon Avenue & Moorpark Street	City of Los Angeles
147	Laurel Canyon Boulevard & US 101 NB Ramps	City of Los Angeles/Caltrans
148	Laurel Canyon Boulevard & US 101 SB Ramps	City of Los Angeles/Caltrans
149	Laurel Canyon Boulevard & Moorpark Street	City of Los Angeles
150	Colfax Avenue & Riverside Drive	City of Los Angeles
151	Colfax Avenue & Moorpark Street	City of Los Angeles
152	Lankershim Boulevard & Chandler Boulevard (South)	City of Los Angeles

ATTACHMENT 1 Pg5

Table 17 (Continued)
Analyzed Intersections

No.	Intersection	Jurisdiction
153	Hollywood Way & Verdugo Avenue	City of Burbank
154	Hollywood Way & Magnolia Boulevard	City of Burbank
155	Buena Vista Street & Verdugo Avenue	City of Burbank
156	Buena Vista Street & Magnolia Boulevard	City of Burbank
157 [c]	Tujunga Avenue & US 101 SB Off Ramp	City of Los Angeles/Caltrans
[illegible] [a]	[illegible]	[illegible]
159 [b]	US 101 SB Off-Ramp & Riverside Drive	City of Los Angeles/Caltrans
160	Vineland Avenue & US 101 SB Ramps	City of Los Angeles/Caltrans
161 [a]	US 101 NB On-Ramp & Moorpark Street	City of Los Angeles/Caltrans
162 [b]	Cahuenga Boulevard & US 101 SB Ramps	City of Los Angeles/Caltrans
163 [b]	Bob Hope Drive & SR 134 EB Off-Ramp	City of Burbank/Caltrans
164 [a]	SR 134 WB On-Ramp & Alameda Avenue	City of Burbank/Caltrans

[a] *Intersection is uncontrolled.*
[b] *Intersection is controlled by stop signs on minor approach.*
[c] *Denotes Congestion Management Program (CMP) arterial monitoring station.*

Source: Gibson Transportation Consulting, Inc., March 2010.

32 IN S.C. (INCLUDING UNIVERSAL)
4 W/I A FEW BLOCKS OF SC. APPROACHING SC.

Response to Comment No. 12-387

Attachment 1 consists of copies of pages 733–737 of the Draft EIR, with notations added by the commenter regarding the number of intersections in and near Studio City, and is referenced in Comment Nos. 12-230 and 12-231. The commenter is referred to Response to Comment Nos. 12-230 and 12-231, above.

Comment No. 12-388

See next page

ATTACHMENT 2

Table 18
Level of Service Definitions for Signalized Intersections
(Critical Movement Analysis Method)

Level of Service	Intersection Capacity Utilization	Definition
A	0.000 - 0.600	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	0.601 - 0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701 - 0.800	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801 - 0.900	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	0.901 - 1.000	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	> 1.000	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

Source: Transportation Research Board, Transportation Research Circular No. 212, Interim Materials on Highway Capacity, 1980.

Table 19
Level of Service Definitions for Unsignalized Intersections
(2000 Highway Capacity Manual Unsignalized Method)

Level of Service	Average Control Delay per Vehicle (seconds)
A	< 10.0
B	> 10.0 and ≤ 15.0
C	> 15.0 and ≤ 25.0
D	> 25.0 and ≤ 35.0
E	> 35.0 and ≤ 50.0
F	> 50.0

Source: Highway Capacity Manual, Transportation Research Board, 2000.

Response to Comment No. 12-388

Attachment 2 consists of a copy of page 738 from the Draft EIR and is referenced in Comment Nos. 12-232 and 12-233. The commenter is referred to Response to Comment Nos. 12-232 and 12-233, above.

Comment No. 12-389

See next page

ATTACHMENT 3

Table 20
Existing Conditions
Intersection Peak Hour Levels of Service

No.	Intersection	Peak Hour	V/C or Delay	LOS
1. [1]	Colfax Avenue & Ventura Boulevard	A.M.	0.580	A
		P.M.	0.840	D
2. [d]	Kraft Avenue/SR 170 SB Off-Ramp & Riverside Drive	A.M.	0.471	A
		P.M.	0.425	A
3. [a]	Tujunga Avenue & Riverside Drive/Camarillo Street	A.M.	0.944	E
		P.M.	0.849	D
4. [1]	Tujunga Avenue & Ventura Boulevard	A.M.	0.487	A
		P.M.	0.659	B
5. [1]	Eureka Drive & Ventura Boulevard	A.M.	0.464	A
		P.M.	0.552	A
6. [a]	Lankershim Boulevard & Magnolia Boulevard	A.M.	0.799	C
		P.M.	0.726	C
7. [1]	Studio City Place & Ventura Boulevard	A.M.	0.411	A
		P.M.	0.562	A
8. [a]	Vineland Avenue & Magnolia Boulevard	A.M.	0.513	A
		P.M.	0.734	C
9. [a]	Vineland Avenue/Lankershim Boulevard & Camarillo Street	A.M.	0.933	E
		P.M.	0.725	C
10. [a]	Vineland Avenue & Riverside Drive	A.M.	0.809	D
		P.M.	0.559	A
11. [a]	Vineland Avenue & Moorpark Street	A.M.	0.871	D
		P.M.	0.793	C
12. [a]	Vineland Avenue & Whipple Street	A.M.	0.433	A
		P.M.	0.364	A
13. [a]	Vineland Avenue & US 101 NB Off-Ramp	A.M.	0.307	A
		P.M.	0.282	A
14. [1]	Vineland Avenue & Ventura Boulevard	A.M.	0.667	B
		P.M.	0.821	D
15. [b]	SR 134 EB On-Ramp e/o Vineland Avenue & Riverside Drive	A.M.	47.6	E
		P.M.	34.1	D
16. [a]	Plaza Parkway & Ventura Boulevard	A.M.	0.538	A
		P.M.	0.381	A
17. [a]	Riverton Avenue/Campo de Cahuenga Way & Ventura Boulevard	A.M.	0.444	A
		P.M.	0.406	A
18. [a]	Lankershim Boulevard & SR 134 WB Off-Ramp	A.M.	0.681	B
		P.M.	0.429	A
19. [a]	Lankershim Boulevard & Riverside Drive	A.M.	0.850	D
		P.M.	0.775	C
20. [a]	Lankershim Boulevard & Moorpark Street	A.M.	1.033	F
		P.M.	0.847	D
21. [a]	Lankershim Boulevard & Whipple Street	A.M.	0.722	C
		P.M.	0.317	A
22. [1]	US 101 NB Ramps & Campo de Cahuenga Way	A.M.	0.077	A
		P.M.	0.408	A

* TWO BLOCKS OUTSIDE OF STUDIO CITY

Page 739

ATTACHMENT 3 A52

Table 20 (Continued)
Existing Conditions
Intersection Peak Hour Levels of Service

No.	Intersection	Peak Hour	V/C or Delay	LOS
23. [a]	Metro Driveway & Campo de Cahuenga Way	A.M.	0.000	A
		P.M.	0.231	A
24. [a]	Cahuenga Boulevard & Magnolia Boulevard	A.M.	1.141	F
		P.M.	0.963	E
25. [a]	Cahuenga Boulevard & Huston Street	A.M.	0.712	C
		P.M.	0.463	A
26. [a]	Cahuenga Boulevard & Camarillo Street	A.M.	0.989	E
		P.M.	0.649	B
27. [a]	Cahuenga Boulevard & SR 134 WB Off-Ramp	A.M.	0.465	A
		P.M.	0.408	A
28. [a]	Cahuenga Boulevard & SR 134 EB Ramps	A.M.	0.666	B
		P.M.	0.550	A
29. [a]	Cahuenga Boulevard & Riverside Drive	A.M.	0.671	B
		P.M.	0.741	C
30. [a]	Cahuenga Boulevard & Moorpark Street	A.M.	0.624	B
		P.M.	0.576	A
31. [a]	Cahuenga Boulevard & Whipple Street	A.M.	0.382	A
		P.M.	0.261	A
32. [c]	Cahuenga Boulevard & Valley Spring Lane	A.M.	28.1	D
		P.M.	24.6	C
33. [a]	Lankershim Boulevard & Cahuenga Boulevard	A.M.	0.484	A
		P.M.	0.364	A
34. [a]	Lankershim Boulevard & Valleyheart Drive/James Stewart Avenue	A.M.	0.329	A
		P.M.	0.356	A
35. [a]	Lankershim Boulevard & Main Street	A.M.	0.431	A
		P.M.	0.390	A
36. [a]	Lankershim Boulevard & Campo de Cahuenga Way /Universal Hollywood Drive	A.M.	0.517	A
		P.M.	0.531	A
37. [a]	Lankershim Boulevard & US 101 NB Off-Ramp	A.M.	0.520	A
		P.M.	0.446	A
38. [a,d]	Lankershim Boulevard & Ventura Boulevard/Cahuenga Boulevard	A.M.	0.723	C
		P.M.	0.624	B
39. [a]	US 101 SB Ramps/Regal Place & Cahuenga Boulevard	A.M.	0.607	B
		P.M.	0.528	A
40. [a]	Ledge Avenue/Moorpark Way & Riverside Drive	A.M.	0.627	B
		P.M.	0.636	B
41. [a]	Forman Avenue & Riverside Drive	A.M.	0.449	A
		P.M.	0.536	A
42. [a]	Broadlawn Drive & Cahuenga Boulevard	A.M.	0.487	A
		P.M.	0.307	A
43. [b]	Universal Center Drive/Universal Studios Boulevard & Buddy Holly Drive	A.M.	0.065	A
		P.M.	0.159	A
44. [b]	Universal Studios Boulevard & Cahuenga Boulevard	A.M.	0.473	A
		P.M.	0.329	A
45. [a]	Oakshire Drive & Cahuenga Boulevard	A.M.	0.529	A
		P.M.	0.396	A

ONLY
COMMITTED BASE ROADWAY & SIGNAL SYSTEM IMPROVEMENTS (TABLE 21)
INTERSECTION AFFECTING STAND ONLY OUT OF 36 INTERSECTIONS.
Page 1013

ATTACHMENT 3 PG 3

Table 20 (Continued)
Existing Conditions
Intersection Peak Hour Levels of Service

No.	Intersection	Peak Hour	V/C or Delay	LOS
46. [f]	US 101 SB Ramps w/o Barham Boulevard/	A.M.	0.952	E
	Cahuenga Boulevard & Cahuenga Boulevard	P.M.	0.643	B
47. [a]	Barham Boulevard &	A.M.	1.146	F
	Cahuenga Boulevard	P.M.	1.047	F
48. [a, c]	Barham Boulevard &	A.M.	-	E
	Buddy Holly Drive/Cahuenga Boulevard	P.M.	-	E
49. [a]	Oakcrest Drive &	A.M.	0.753	C
	Cahuenga Boulevard	P.M.	0.494	A
50. [a]	Mulholland Drive &	A.M.	0.736	C
	Cahuenga Boulevard	P.M.	0.668	B
51. [a]	Cahuenga Boulevard &	A.M.	0.659	B
	Hillpark Drive	P.M.	0.521	A
52. [f]	Barham Boulevard &	A.M.	0.813	D
	De Witt Drive	P.M.	0.698	B
53. [a]	Barham Boulevard &	A.M.	0.820	D
	Lake Hollywood Drive	P.M.	0.826	D
54. [f]	Barham Boulevard &	A.M.	0.745	C
	Coyote Canyon Road	P.M.	0.668	B
55. [d]	Barham Boulevard &	A.M.	0.973	E
	Lakeside Plaza Drive/Forest Lawn Drive	P.M.	0.880	D
56.	Warner Brothers Studios Gate 7/Gate 8 &	A.M.	0.526	A
	Forest Lawn Drive	P.M.	0.466	A
57.	Memorial Drive &	A.M.	0.402	A
	Forest Lawn Drive	P.M.	0.464	A
58.	Mount Sinai Drive &	A.M.	0.415	A
	Forest Lawn Drive	P.M.	0.408	A
59.	Forest Lawn Drive &	A.M.	0.831	D
	Zoo Drive	P.M.	0.600	A
60. [b]	Forest Lawn Drive &	A.M.	30.8	D
	SR 134 EB Ramps	P.M.	19.3	C
61. [b]	Forest Lawn Drive &	A.M.	**	F
	SR 134 WB Ramps	P.M.	17.7	C
62. [a]	Cahuenga Boulevard/Highland Avenue &	A.M.	0.619	A
	Pat Moore Way/US 101 On-Ramps	P.M.	0.463	A
63. [a]	Highland Avenue &	A.M.	0.643	B
	Odin Street	P.M.	0.523	A
64. [a]	Highland Avenue &	A.M.	0.586	A
	Camrose Drive	P.M.	0.511	A
65. [a, c]	Highland Avenue &	A.M.	-	F
	Franklin Avenue	P.M.	-	F
66. [a, c]	Highland Avenue &	A.M.	-	F
	Franklin Place/Franklin Avenue	P.M.	-	F
67. [c]	Odin Street &	A.M.	**	F
	Cahuenga Boulevard	P.M.	**	F
68. [a]	Cahuenga Boulevard &	A.M.	0.425	A
	US 101 NB Off-Ramp	P.M.	0.754	C

ATTACHMENT 3 PG 4

Table 20 (Continued)
Existing Conditions
Intersection Peak Hour Levels of Service

No.	Intersection	Peak Hour	V/C or Delay	LOS
69. [a]	Cahuenga Boulevard &	A.M.	0.739	C
	Franklin Avenue	P.M.	1.170	F
70. [a]	Cahuenga Boulevard &	A.M.	0.764	C
	Hollywood Boulevard	P.M.	0.661	B
71. [a]	Vine Street &	A.M.	0.343	A
	Franklin Avenue/US 101 SB Off-Ramp	P.M.	0.469	A
72. [c]	Lankershim Boulevard &	A.M.	18.1	C
	Muddy Waters Drive	P.M.	19.2	C
73. [b]	Lankershim Boulevard &	A.M.	11.7	B
	Jimi Hendrix Drive	P.M.	13.4	B
74.	Pass Avenue &	A.M.	0.406	A
	Magnolia Boulevard	P.M.	0.529	A
75.	Pass Avenue &	A.M.	0.477	A
	Verdugo Lane	P.M.	0.590	A
76.	Pass Avenue &	A.M.	0.369	A
	Oak Street	P.M.	0.425	A
77. [f]	Evergreen Street/Riverside Drive &	A.M.	0.530	A
	Alameda Avenue	P.M.	0.595	A
78.	Pass Avenue &	A.M.	0.499	A
	SR 134 EB Off-Ramp	P.M.	0.508	A
79. [f]	Pass Avenue &	A.M.	0.599	A
	Alameda Avenue	P.M.	0.713	C
80. [f]	Pass Avenue &	A.M.	0.461	A
	Riverside Drive	P.M.	0.363	A
81. [f]	Olive Avenue &	A.M.	0.673	B
	Pass Avenue	P.M.	0.747	C
82. [f]	Olive Avenue &	A.M.	0.430	A
	Warner Brothers Studios Gate 2/Gate 3	P.M.	0.501	A
83. [f]	Olive Avenue &	A.M.	0.665	B
	Warner Brothers Studios Gate 1/Lakeside Drive	P.M.	0.744	C
84. [f]	Hollywood Way &	A.M.	0.773	C
	Alameda Avenue	P.M.	0.749	C
85. [f]	Cordova Street/SR 134 WB Off-Ramp &	A.M.	0.641	B
	Alameda Avenue	P.M.	0.503	A
86. [f]	Hollywood Way &	A.M.	0.550	A
	Olive Avenue	P.M.	0.681	B
87. [f]	Olive Avenue &	A.M.	0.602	B
	Riverside Drive	P.M.	0.572	A
88. [f]	Lima Street &	A.M.	0.434	A
	Olive Avenue	P.M.	0.396	A
89. [f]	Olive Avenue &	A.M.	0.569	A
	Alameda Avenue	P.M.	0.710	C
90.	California Street &	A.M.	0.335	A
	Riverside Drive	P.M.	0.363	A
91. [f]	Bob Hope Drive &	A.M.	0.622	B
	Alameda Avenue	P.M.	0.636	B

ATTACHMENT 3 PG 5

Table 20 (Continued)
Existing Conditions
Intersection Peak Hour Levels of Service

No.	Intersection	Peak Hour	V/C or Delay	LOS
92. [f]	Buena Vista Street & Alameda Avenue	A.M.	0.750	C
		P.M.	0.838	D
93.	Buena Vista Street/SR 134 EB On-Ramp & Riverside Drive/SR 134 WB Ramps	A.M.	0.777	C
		P.M.	0.809	D
94. [b]	SR 134 EB On-Ramp/Screenland Drive & Riverside Drive	A.M.	33.3	D
		P.M.	34.6	D
95. [f]	Buena Vista Street & Olive Avenue	A.M.	0.796	C
		P.M.	0.776	C
96. [a,d]	Sepulveda Boulevard & Ventura Boulevard	A.M.	1.024	F
		P.M.	1.221	F
97. [a]	Noble Avenue & Ventura Boulevard	A.M.	0.579	A
		P.M.	0.707	C
98. [a]	Koster Avenue & Ventura Boulevard	A.M.	0.663	B
		P.M.	0.635	B
99. [a]	Willis Avenue & Ventura Boulevard	A.M.	0.434	A
		P.M.	0.649	A
100. [a]	Cedros Avenue (West) & Ventura Boulevard	A.M.	0.651	A
		P.M.	0.782	C
101. [a]	Cedros Avenue (East) & Ventura Boulevard	A.M.	0.805	D
		P.M.	0.699	B
102. [a]	Van Nuys Boulevard & Ventura Boulevard	A.M.	0.849	D
		P.M.	1.003	F
103. [a]	Tyrone Avenue/Beverly Glen Boulevard & Ventura Boulevard	A.M.	0.564	A
		P.M.	0.772	C
104. [a]	Hazeltine Avenue (West) & Ventura Boulevard	A.M.	0.674	B
		P.M.	0.619	B
105. [a]	Stern Avenue (West) & Ventura Boulevard	A.M.	0.419	A
		P.M.	0.427	A
106. [a,d]	Woodman Avenue & Ventura Boulevard	A.M.	0.588	A
		P.M.	0.587	A
107. [a]	Sunnyslope Avenue & Ventura Boulevard	A.M.	0.374	A
		P.M.	0.399	A
108. [a]	Dixie Canyon Avenue & Ventura Boulevard	A.M.	0.415	A
		P.M.	0.491	A
109. [a]	Fulton Avenue & Ventura Boulevard	A.M.	0.603	B
		P.M.	0.645	B
110. [a]	Valley Vista Boulevard/Ethel Avenue & Ventura Boulevard	A.M.	0.493	A
		P.M.	0.519	A
111. [a]	Coldwater Canyon Avenue & Ventura Boulevard	A.M.	0.859	D
		P.M.	1.073	F
112. [a]	Whitsett Avenue/Laurel Terrace Drive & Ventura Boulevard	A.M.	0.555	A
		P.M.	0.661	B
113. [a]	Laurelgrove Avenue & Ventura Boulevard	A.M.	0.459	A
		P.M.	0.548	A
114. [a]	Vantage Avenue & Ventura Boulevard	A.M.	0.509	A
		P.M.	0.533	A

ATTACHMENT 3 PG 6

Table 20 (Continued)
Existing Conditions
Intersection Peak Hour Levels of Service

No.	Intersection	Peak Hour	V/C or Delay	LOS
115. [a,d]	Laurel Canyon Boulevard &	A.M.	0.869	D
	Ventura Boulevard	P.M.	0.873	D
116. [a]	Radford Avenue/Ventura Place &	A.M.	0.456	A
	Ventura Boulevard	P.M.	0.574	A
117. [b]	US 101 SB On-Ramp n/o Lankershim Boulevard &	A.M.	0.0	A
	Ventura Boulevard	P.M.	0.0	A
118. [a]	Lankershim Boulevard/Tujunga Avenue &	A.M.	0.719	C
	Burbank Boulevard	P.M.	0.835	D
119. [a]	Vineland Avenue &	A.M.	0.805	D
	Burbank Boulevard	P.M.	0.756	C
120. [a]	Cahuenga Boulevard &	A.M.	0.587	A
	Burbank Boulevard	P.M.	0.649	B
121. [a]	Cahuenga Boulevard &	A.M.	0.293	A
	Chandler Boulevard	P.M.	0.478	A
122.	La Cienega Boulevard &	A.M.	0.683	B
	Sunset Boulevard	P.M.	1.031	F
123. [d]	La Cienega Boulevard &	A.M.	0.979	E
	Santa Monica Boulevard	P.M.	0.863	D
124. [g]	Laurel Canyon Boulevard &	A.M.	0.487	A
	Hollywood Boulevard	P.M.	0.700	B
125. [g]	Crescent Heights Boulevard &	A.M.	0.985	E
	Sunset Boulevard	P.M.	0.870	D
126. [g]	Fairfax Avenue &	A.M.	0.824	D
	Hollywood Boulevard	P.M.	0.713	C
127. [g]	Fairfax Avenue &	A.M.	0.611	B
	Sunset Boulevard	P.M.	0.739	C
128. [e,g]	La Brea Avenue &	A.M.	-	D
	Franklin Avenue	P.M.	-	D
129. [a]	La Brea Avenue &	A.M.	0.831	D
	Hollywood Boulevard	P.M.	0.773	C
130. [a]	La Brea Avenue &	A.M.	0.767	C
	Sunset Boulevard	P.M.	0.830	D
131.	La Brea Avenue &	A.M.	0.921	E
	Fountain Avenue	P.M.	0.868	D
132.	La Brea Avenue &	A.M.	0.809	D
	Santa Monica Boulevard	P.M.	0.844	D
133. [e,g]	Highland Avenue &	A.M.	-	E
	Hollywood Boulevard	P.M.	-	E
134. [g]	Highland Avenue &	A.M.	0.612	B
	Sunset Boulevard	P.M.	0.651	B
135. [g]	Highland Avenue &	A.M.	0.834	D
	Fountain Avenue	P.M.	0.668	B
136. [g,d]	Highland Avenue &	A.M.	0.776	C
	Santa Monica Boulevard	P.M.	0.805	D
137. [g]	Kester Avenue (East) &	A.M.	0.515	A
	Ventura Boulevard	P.M.	0.885	D

ATTACHMENT 3 AG 7

Table 20 (Continued)
Existing Conditions
Intersection Peak Hour Levels of Service

No.	Intersection	Peak Hour	V/C or Delay	LOS
138.	San Vicente Boulevard/Clark St &	A.M.	0.829	D
	Sunset Boulevard	P.M.	0.944	E
139. [a]	Cahuenga Boulevard &	A.M.	0.802	D
	Sunset Boulevard	P.M.	0.706	C
140. [a]	Lankershim Boulevard &	A.M.	0.343	A
	Chandler Boulevard (North)	P.M.	0.186	A
141. [a]	SR 170 SB Ramps &	A.M.	0.515	A
	Magnolia Boulevard	P.M.	0.488	A
142. [a]	SR 170 NB Ramps &	A.M.	0.360	A
	Magnolia Boulevard	P.M.	0.435	A
143. [b]	Tujunga Avenue &	A.M.	12.3	B
	SR 170 NB On-Ramp/Private Driveway	P.M.	10.8	B
144. [a]	Coldwater Canyon Avenue &	A.M.	0.416	A
	US 101 NB Ramps	P.M.	0.440	A
145. [a]	Coldwater Canyon Avenue &	A.M.	0.485	A
	US 101 SB Ramps	P.M.	0.449	A
146. [a]	Coldwater Canyon Avenue &	A.M.	0.749	C
	Moorpark Street	P.M.	0.844	D
147. [a]	Laurel Canyon Boulevard &	A.M.	0.560	A
	US 101 NB Ramps	P.M.	0.515	A
148. [a]	Laurel Canyon Boulevard &	A.M.	0.518	A
	US 101 SB Ramps	P.M.	0.541	A
149. [a]	Laurel Canyon Boulevard &	A.M.	0.919	E
	Moorpark Street	P.M.	1.077	F
150. [a]	Colfax Avenue &	A.M.	0.853	D
	Riverside Drive	P.M.	0.709	C
151. [a]	Colfax Avenue &	A.M.	0.739	C
	Moorpark Street	P.M.	0.569	A
152. [a]	Lankershim Boulevard &	A.M.	0.480	A
	Chandler Boulevard (South)	P.M.	0.337	A
153. [f]	Hollywood Way &	A.M.	0.814	D
	Verdugo Avenue	P.M.	0.800	C
154. [f]	Hollywood Way &	A.M.	0.806	D
	Magnolia Boulevard	P.M.	0.869	D
155. [f]	Buena Vista Street &	A.M.	0.601	B
	Verdugo Avenue	P.M.	0.731	C
156. [f]	Buena Vista Street &	A.M.	0.576	A
	Magnolia Boulevard	P.M.	0.846	D
157. [c]	Tujunga Avenue &	A.M.	12.8	B
	US 101 SB Off-Ramp	P.M.	16.3	C
158. [b]	Tujunga Avenue &	A.M.	10.6	B
	US 101 NB On-Ramp	P.M.	9.6	A
159. [c]	US 101 SB Off-Ramp &	A.M.	14.4	B
	Riverside Drive	P.M.	11.0	B
160. [a]	Vineland Avenue &	A.M.	0.527	A
	US 101 SB Ramps	P.M.	0.369	A

ATTACHMENT 3 Pg 8

Table 20 (Continued)
Existing Conditions
Intersection Peak Hour Levels of Service

No.	Intersection	Peak Hour	V/C or Delay	LOS
161. [b]	US 101 NB On-Ramp &	A.M.	10.2	B
	Moorpark Street	P.M.	12.8	B
162. [c]	Cahuenga Boulevard &	A.M.	**	F
	US 101 SB Ramps	P.M.	69.6	F
163. [c]	Bob Hope Drive &	A.M.	**	F
	SR 134 EB Off-Ramp	P.M.	**	F
164. [b]	SR 134 WB On-Ramp &	A.M.	12.7	B
	Alameda Avenue	P.M.	15.2	C

** *Indicates oversaturated conditions, i.e. long waits at the approaches controlled by stop signs. Delay cannot be calculated.*

a. *Intersection is operating under the LADOT Adaptive Traffic Control System (ATCS). A credit of 0.10 in V/C ratio was included in the analysis.*
b. *Intersection is uncontrolled. Analysis was done using 2000 Highway Capacity Manual Two-Way Stop-Controlled methodology. For the purpose of evaluating the operating conditions of the intersection, level of service is based on average vehicular delay in seconds for the most constrained approach rather than V/C ratio.*
c. *Intersection is controlled by stop signs on minor approach. Analysis was done using 2000 Highway Capacity Manual Two-Way Stop-Controlled methodology. For the purpose of evaluating the operating conditions of the intersection, level of service is based on average vehicular delay in seconds for the most constrained approach rather than V/C ratio.*
d. *Denotes CMP arterial monitoring station.*
e. *Traffic counts at this location were not fully representative of the situation due to downstream constraints and pedestrian conflicts. LOS is based on field observations and has not been calculated based on the Universal City Transportation Model.*

Source: Gibson Transportation Consulting, Inc., March 2010.

OLD— 32

AM	PM
22	19
3	5
3	2
3	4
1	0
0	2
32	32

Existing Conditions
Intersection Peak Hour Levels of Service Summary

Level of Service	Intersection	
	A.M. Peak Hour	P.M. Peak Hour
A	71	71
B	28	24
C	19	30
D	24	23
E	12	4
F	10	12
Total	164	164

CORRECTED 4

AM	PM
0	1
3	1
0	2
1	0
0	0
0	0
4	4

Response to Comment No. 12-389

Attachment 3 consists of a copy of Table 20, Existing Conditions Intersection Peak Hour Levels of Service from pages 739–746 of the Draft EIR, with notations added by the commenter regarding intersections listed in the table, and is referenced in Comment Nos. 12-232 and 12-233. The commenter is referred to Response to Comment Nos. 12-232 and 12-233, above.

Comment No. 12-390

See next page

Table 21
Future With Project With Funded Improvements Conditions (Year 2030)
CMP Arterial Monitoring Stations - Peak Hour Levels of Service

ARTERIAL MONITORING STATIONS

No.		Intersection	Peak Hour	Existing		Future without Project		Future with Project, Before TDM Trip Reduction and Mitigations				Future with Project with TDM, Before Mitigations				Future with Project with Funded Improvements			
				V/C	LOS	V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?	V/C	LOS	Change in V/C	Significant Impact?	V/C	LOS	Change in V/C	Residual Impact?
38.	[a]	Lankershim Boulevard & Ventura Boulevard/Cahuenga Boulevard	A.M.	0.807	D	1.004	F	1.057	F	0.053	YES	1.041	F	0.037	YES	0.969	E	-0.035	NO
			P.M.	0.723	C	0.968	E	1.064	F	0.096	YES	1.048	F	0.079	YES	0.933	E	-0.036	NO
96.	[a]	Sepulveda Boulevard & Ventura Boulevard	A.M.	1.056	F	1.296	F	1.296	F	0.000	NO	1.296	F	0.000	NO	1.273	F	-0.023	NO
			P.M.	1.235	F	1.463	F	1.463	F	0.000	NO	1.463	F	0.000	NO	1.463	F	0.000	NO
106.	[a]	Woodman Avenue & Ventura Boulevard	A.M.	0.745	C	0.961	E	0.982	E	0.021	NO	0.974	E	0.013	NO	0.940	E	-0.021	NO
			P.M.	0.744	C	1.040	F	1.066	F	0.026	YES	1.059	F	0.019	NO	1.025	F	-0.015	NO
115.	[a]	Laurel Canyon Boulevard & Ventura Boulevard	A.M.	0.933	E	1.176	F	1.203	F	0.027	YES	1.194	F	0.018	NO	1.159	F	-0.017	NO
			P.M.	0.936	E	1.105	F	1.138	F	0.033	YES	1.122	F	0.023	YES	1.093	F	-0.012	NO
123.	[a]	La Cienega Boulevard & Santa Monica Boulevard	A.M.	0.941	E	1.017	F	1.018	F	0.001	NO	1.018	F	0.001	NO	1.018	F	0.001	NO
			P.M.	0.841	D	0.888	D	0.891	D	0.003	NO	0.890	D	0.002	NO	0.890	D	0.002	NO
136.	[a]	Highland Avenue & Santa Monica Boulevard	A.M.	0.881	D	1.007	F	1.015	F	0.008	NO	1.013	F	0.006	NO	1.013	F	0.006	NO
			P.M.	0.906	E	1.024	F	1.028	F	0.004	NO	1.026	F	0.002	NO	1.026	F	0.002	NO

[a] The above level of service calculations are based on the CMP methodology.

TABLE IS = A EXCELLENT B VERY GOOD C GOOD D FAIR E POOR F FAILURE

STATION #38 CURRENTLY RATED D/C W/ PROJECT & TDM & FUNDED IMPROVEMENTS WILL STILL DEGRADE TO E/E AT BEST IF ALL BASE CALCULATIONS ARE CORRECT AND FUTURE DEVELOPMENT DOES NOT EXCEED PROJECTIONS

STATION #115 CURRENTLY RATED E/E W/ PROJECT & TDM & FUNDED IMPROVEMENTS WILL STILL DEGRADE TO F/F IF ALL CALCULATIONS OF FUTURE GROWTH AND DEVELOPMENT ARE CORRECT

ATTACHMENT 4

Response to Comment No. 12-390

Attachment 4 consists of a copy of Table 21 from page 747 of the Draft EIR, with notations added by the commenter regarding arterial monitoring stations, and is referenced in Comment Nos. 12-233 and 12-234. The commenter is referred to Response to Comment Nos. 12-233 and 12-234, above.

Comment No. 12-391

See next page

ATTACHMENT 5

Table 22
Level of Service Definitions for Freeway Segments

Level of Service	Volume/ Capacity Ratio	Flow Conditions
A	0.00 - 0.35	Highest quality of service. Free traffic flow, low volumes and densities. Little or no restriction on maneuverability or speed.
B	0.36 - 0.54	Stable traffic flow, speed becoming slightly restricted. Low restriction on maneuverability.
C	0.55 - 0.77	Stable traffic flow, but less freedom to select speed, change lanes, or pass. Density increasing.
D	0.78 - 0.93	Approaching unstable flow. Speeds tolerable but subject to sudden and considerable variation. Less maneuverability and driver comfort.
E	0.94 - 1.00	Unstable traffic flow with rapidly fluctuating speeds and flow rates. Short headways, low maneuverability and low driver comfort.
F(0)	1.01 - 1.25	Forced traffic flow. Speed and flow may be greatly reduced with high densities.
F(1)	1.26 - 1.35	Forced traffic flow. Severe congested conditions prevail for more than one hour. Speed and flow may drop to zero with high densities.
F(2)	1.36 - 1.45	Forced traffic flow. Severe congested conditions prevail for more than one hour. Speed and flow may drop to zero with high densities.
F(3)	> 1.45	Forced traffic flow. Severe congested conditions prevail for more than one hour. Speed and flow may drop to zero with high densities.

Source: 2004 Congestion Management Program for Los Angeles County, Los Angeles County Metropolitan Transportation Authority, July 2004.

Response to Comment No. 12-391

Attachment 5 consists of a copy of page 748 from the Draft EIR and is referenced in Comment No. 12-235. The commenter is referred to Response to Comment No. 12-235, above.

Comment No. 12-392

See next page

Table 23
Existing Conditions - Freeway Segment Peak Hour Levels of Service

No.	Freeway Segment	Direction	Number of Lanes [a]	Capacity	A.M. Peak Hour			P.M. Peak Hour		
					Volume	V/C	LOS	Volume	V/C	LOS
1.	US 101	NB	4	8,000	9,185	1.15	F(0)	11,717	1.46	F(3)
	south of Alvarado Street	SB	4	8,000	12,684	1.59	F(3)	11,953	1.49	F(3)
2.	US 101	NB	4	8,000	8,766	1.10	F(0)	11,634	1.45	F(2)
	south of Vermont Avenue	SB	4	8,000	12,105	1.51	F(3)	10,956	1.37	F(2)
3. [b]	US 101	NB	4	8,000	7,425	0.93	D	11,533	1.44	F(2)
	south of Santa Monica Boulevard	SB	4	8,000	11,533	1.44	F(2)	10,685	1.34	F(1)
4.	US 101	NB	5	10,000	8,574	0.86	D	10,205	1.02	F(0)
	south of Barham Boulevard	SB	5	10,000	12,114	1.21	F(0)	9,644	0.96	E
5.	US 101	NB	5	10,000	7,586	0.76	C	9,798	0.98	E
	north of Campo de Cahuenga Way	SB	5	10,000	9,954	1.00	E	8,026	0.80	D
6. [b]	US 101	NB	5	10,000	8,840	0.88	D	11,157	1.12	F(0)
	east of Coldwater Canyon Avenue	SB	5	10,000	9,988	1.00	E	9,405	0.94	E
7.	US 101	NB	5.5	13,000	9,829	0.76	C	11,728	0.90	D
	east of I-405	SB	6	12,000	10,686	0.89	D	9,886	0.82	D
8. [b]	SR 134 @	EB	4.5	9,000	11,803	1.31	F(1)	7,238	0.80	D
	Forman Avenue	WB	4.5	9,000	7,481	0.83	D	9,375	1.04	F(0)
9.	SR 134	EB	4.5	9,000	12,011	1.33	F(1)	7,132	0.79	D
	east of Forest Lawn Drive	WB	4.5	9,000	10,067	1.12	F(0)	10,034	1.11	F(0)
10.	SR 170	NB	4.5	9,000	6,656	0.74	C	8,641	0.96	E
	north of Magnolia Boulevard	SB	4.5	9,000	9,657	1.07	F(0)	6,312	0.70	C
11. [b]	SR 170	NB	4.5	9,000	5,629	0.63	C	7,170	0.80	D
	south of Sherman Way	SB	4.5	9,000	8,830	0.98	E	5,772	0.64	C
12. [b]	I-5 @	NB	5.5	11,000	9,345	0.85	D	14,416	1.31	F(1)
	Colorado Boulevard Extension	SB	5.5	11,000	10,124	0.92	D	9,780	0.89	D
13. [b]	I-5	NB	4	8,000	6,922	0.87	D	8,689	1.09	F(0)
	south of Burbank Boulevard	SB	4	8,000	8,933	1.12	F(0)	7,386	0.92	D

ATTACHMENT 6

* F (6) FORCED TRAFFIC FLOW: ~~SEVERE CONGESTED CONDITIONS~~ SPEED & FLOW MAY BE GREATLY REDUCED W/ HIGH DENSITIES!

Table 23 (Continued)
Existing Conditions - Freeway Segment Peak Hour Levels of Service

No.	Freeway Segment	Direction	Number of Lanes [a]	Capacity	A.M. Peak Hour			P.M. Peak Hour		
					Volume	V/C	LOS	Volume	V/C	LOS
14. [b]	I-405	NB	5.5	11,000	9,131	0.83	D	15,631	1.42	F(2)
	south of Mulholland Drive	SB	5.5	11,000	12,505	1.14	F(0)	8,651	0.79	D
15.	I-405	NB	5	10,000	9,050	0.91	D	15,480	1.55	F(3)
	south of US 101	SB	5.5	11,000	12,395	1.13	F(0)	8,565	0.78	D
16.	I-405	NB	4.5	9,000	7,285	0.81	D	11,604	1.29	F(1)
	north of US 101	SB	4.5	9,000	9,979	1.11	F(0)	7,752	0.86	D

[a] *The lane capacities are assumed to be 2,000 vph for through lanes and 1,000 vph for high-occupancy vehicle (HOV) and auxiliary lanes. HOV and auxiliary lanes are thus represented as ½ of a lane.*
[b] *CMP Freeway Monitoring Location.*

Source: Gibson Transportation Consulting, Inc., March 2010.

ATTACHMENT 6 Pg 2

Response to Comment No. 12-392

Attachment 6 consists of a copy of Table 23 from pages 749–750 of the Draft EIR, with notations added by the commenter regarding freeway segments listed on the table, and is referenced in Comment No. 12-236. The commenter is referred to Response to Comment No. 12-236, above.

Comment No. 12-393

See next page

Table 3.3
Trip Generation - Build-Out Development Projects

Map ID	Project Name/Location	Description/Land Use	ITE Land Use Code/Source	Size	Status	Net Daily Trips	Net A.M. Peak Hour Trips			Net P.M. Peak Hour Trips		
							In	Out	Total	In	Out	Total
CITY OF BURBANK												
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	[illegible]	Super Performance	[illegible]	[illegible]	Proposed	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	[illegible]	Gas Station/Convenience Store	Convenience Store - 853	[illegible]		[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
2.	West Olive Project	Specialty Retail/Shop	Convenience Store - 853	2,700 sf		172	11	11	22	9	9	18
	2601 Riverside Drive	Bagel Shop	Bagel Shop - 850	1,000 sf	Proposed		55	59	114	13	12	25
	Riverside Drive & Kenneth Road, Media District	Specialty Retail	Specialty Retail	3,400 sf		350	2	1	3	20	10	30
		Residential	Apartment - 220	8 DU		67	8	2	9	4	2	6
3.	Media District Specific Plan	Office				-	-	-	-	-	-	-
		Residential			Approved	-	-	-	-	-	-	-
		Retail				-	-	-	-	-	-	-
		Restaurant				-	-	-	-	-	-	-
4.	Avit North Site	High-Turnover Restaurant	High-Turnover (Sit-Down) Restaurant - 932	10,000 sf		1,102	9	9	18	68	70	97
	Gilts Mall/Theatre	Fast-Food w/Drive Through	Fast-Food w/ Drive Through - 934	2,460 sf		1,215	58	54	100	44	41	85
	Burbank Empire Area	Fast-Food w/Drive Through	Fast-Food w/Drive Through - 934	2,475 sf	Under Construction	1,223	54	51	105	53	50	103
		High-Turnover Restaurant	High-Turnover (Sit-Down) Restaurant - 932	5,170 sf		903	50	39	89	70	70	52
		Fast-Food w/Drive Through	Fast-Food w/Drive Through - 934	2,400 sf		1,064	55	57	112	42	36	78
5.	Empire Center Office Park											
	Site generally bounded by Empire Avenue, Victory Place, Buena Vista Street and the Warner's Rail Road tracks	General Office	General Office - 710	525,000 sf	Entitled	5,800	422	63	485	82	422	480
6.	Media Studios North Phase II											
	2501 Olive Street	General Office	General Office - 710	35,000 sf	Remaining Entitlement	1,048	135	18	147	24	118	142
	Golden State Project Area											
7.	Former Avalon Atlantic Site-Phase II											
	2323 Olive Street, adjacent to I-5 Freeway	Light Industrial Park	Industrial Park - 130	37,339 sf	Proposed	394	33	23	113	24	91	115
	Golden State Project Area											
8.	Bob Hope Center	General Office	General Office - 710	100,000 sf		1,305	169	23	192	26	127	153
	Bounded by Olive Avenue, Alameda Avenue, California Street and Lima Street	Live Performing Arts Theater/Auditorium	Live Theater - 441	300 Seats	Proposed	NA	0	0	0	4	4	8
	West Olive Project Area											
9.	Burbank Water Conservation	Retail/Restaurant	Quality Restaurant - 931	20,500 sf		940	4	4	8	62	16	78
	Bounded by Alameda Avenue, Olive Avenue, Lima Street, and Avon Street	Church	Church	17,500	Approved	448	7	4	11	19	20	39
	West Olive Project Area (Media District)	Condominiums	Condominium - 230	220 DU		1,268	16	91	90	78	58	136
		Child Care	Child Care	7,500		1,344	20	82	102	61	45	106
10.	Independent Living Facility	Independent Living Facility for Low-Income Disabled Adults	Congregate Care Facility - 253	15 DU	Under Construction	36	1	0	1	3	1	3
	300 S San Fernando Boulevard											
	South San Fernando Project Area											
11.	Palmetto Residential Project	Residential	Apartment - 220	44 DU		1,220	28	105	121	100	39	139
	Southwest corner of Buena Vista Street and Empire Avenue		Condominium - 230	200 DU	Proposed	1,368	31	131	162	115	81	196
		Retail	Specialty Retail - 814	1,000 sf		72	1	1	2	3	3	6
12.	City of Burbank General Plan Update		Place Holder	-		-	-	-	-	-	-	-

ATTACHMENT 7

Table 25 (Continued)
Trip Generation Estimates for Related Projects

Map ID	Project Name/Location	Description/Land Use	ITE Land Use Code/Source	Size	Status[1]	Net Daily Trips	Net A.M. Peak Hour Trips			Net P.M. Peak Hour Trips		
							In	Out	Total	In	Out	Total
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	[illegible]	Restaurant [illegible]	Quality Restaurant - 931 [illegible]	6,400 sf [illegible]	Subject Property	786	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	[illegible]	Church Office	[illegible]	467.000 sf	Proposed	5,370	346	91	156	101	304	[illegible]
	[illegible] [illegible] Metro Red Line Station - Lankershim Boulevard and Oak Street	General Office	General Office - 710	192.000 sf	Proposed	2,115	232	33	264	45	227	272
18.	Mixed-Use Development 3800 Olive Avenue	Restaurant Starbucks Coffee Shop Residential Office	Quality Restaurant - 931 Coffee Shop - 936 Luxury Apartment - 220 General Office - 710	14,800 sf 1,200 sf 8 DU 8,300 sf	Proposed	396	4	3	7	12	13	25
						1,024	107	17	124	54	115	139
19.	AMC Project 2	Commercial Shopping Condominiums	Shopping Center - 820 Condominium - 230	30.000 sf 116 DU	Under Construction	2,147	35	20	55	93	106	184
						38	0	40	32	47	10	61
				SUBTOTAL - CITY OF BURBANK RELATED PROJECTS		43,791	3,450	1,269	4,552	1,015	3,373	4,388
CITY OF LOS ANGELES												
1.	[illegible] 305 W Santa Monica Boulevard	Residential Neighborhood Retail	Apartment - 220 Shopping Center - 820	497 DU 577,605 sf	Proposed	1,367	31	70	101	73	45	118
2.	Hollywood/Gower Mixed-Use Project (2004-CEN-2183) 5521 Hollywood Boulevard	Residential Retail	Apartment - 220 Shopping Center - 820	109 DU 9,067 sf	Proposed	736 420	11 3	33 4	44 7	33 16	24 22	57 38
3.	ENV-2004-3646-EIR/ADM-CEN-1598 5142 Fulton Avenue	Residential	Apartment - 220	130 DU	Proposed	902	11	46	57	56	25	81
4.	ENV-2005-3601-EIR/ADM-CEN-1534 [illegible] McCadden Place	Residential	Condominium - 230	218 DU	Proposed	1,648	16	73	89	60	30	90
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
5.	ENV-2005-4185-EIR, North Hollywood - Valley Village 11215 - 11244 Hesby Street	Residential	Condominium - 230	15 DU	Proposed	95	1	6	7	3	2	5
7.	ENV-2005-5103 North Hollywood - Valley Village 11208 - 11220 Hesby Street	Residential	Condominium - 230	12 DU	Proposed	76	1	4	5	4	2	6
8.	ENV-2005-4474 14401 Oxnard Place	Residential	Condominium - 230	43 DU	Proposed	361	4	17	21	17	8	25
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
	[illegible]	Office	General Office - 710	30.045 s	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
10.	ENV-2004-757 12428 Riverside Drive	General Office	General Office - 710	35.475 sf	Proposed	391	49	6	55	7	37	44
	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

ATTACHMENT 7 Pg 2

Table 23 (Continued)
Trip Generation Estimates for Related Projects

Map ID	Project Number/Location	Description/Land Use	ITE Land Use Code/Source	Size	Status[1]	Net Daily Trips	Net A.M. Peak Hour Trips			Net P.M. Peak Hour Trips		
							In	Out	Total	In	Out	Total
19.	EAF-2009-3835 1104 N Vista Boulevard	Free-Standing Discount Store	Free-Standing Discount Store - 815	15,206 sf	Proposed	1,037	12	8	19	39	39	78
				218 DU								
14.		Supermarket/Drug Store Office	Supermarket - 850 Drug Store - 880 Medical-Dental Office Building - 720	45,000 sf (35,670 sf) (9,330 sf)	Proposed	2,420	55	0	55	72	70	142
16.	Commercial Development 7500 Sunset Boulevard	Shopping Center Retail	Shopping Center - 820 Shopping Center - 820	15,750 sf 8,179 sf	Proposed	949 357	10 3	6 3	16 6	38 13	31 5	69 18
17.	La Brea & Fernwood Joint Living Market Southwest corner of La Brea Avenue and Fernwood Place	Specialty Retail Residential	Specialty Retail - 814 Condominium - 230	15,630 sf 130 DU	Proposed	721 1,085	9 13	9 66	18 79	26 55	25 111	51 166
18.	DRA Additional Rehab Project 7040 W Hollywood Boulevard	Residential	Condominium - 230	45 DU	Proposed	340	3	15	18	15	7	22
19.	EAF-2010-0285 Live Theater 6627 Hawthorn Avenue	Live Theater	Live Theater - 441	450 Seats	Proposed	N/A	0	0	0	80	40	160
20.	ENV-2010-0954-EIR EA 6121 W Hollywood Boulevard	Restaurant	Quality Restaurant - 931	12,132 sf	Proposed	1,387	61	6	12	76	37	113
21.	EAF-2011-4247 Drinking Place 6121 Hollywood Boulevard	Drinking Place	Drinking Place - 925	7,500 sf	Proposed	N/A	0	0	0	55	29	85
22.	DIR EIS EN Hollywood Project 561 Hollywood Boulevard	Specialty Retail	Specialty Retail - 814	50,200 sf	Proposed	2,662	0	0	0	72	101	181
23.	2007-CEN-3071 512 W Sunset Boulevard	Mixed-Use	High-Rise Apartment - 222 General Office - 710 Hotel - 310 Quality Restaurant - 931 High-Turnover (Sit-Down) Restaurant - 932 High-Turnover (Sit-Down) Restaurant - 932 Shopping Center - 820	400 DU 150,000 sf 125 room 5,000 sf 5,000 sf 2,500 sf 12,000 sf	Proposed	4,752	122	367	489	330	223	553
24.	EAF-2011-0188 Restaurant w Live Entertainment and Sales 5634 W Hollywood Boulevard	Restaurant Dance Club	Drinking Place - 925	20,035 sf	Proposed	2,005	0	0	0	110	67	177
25.	DRA Additional Rehab Project 1617 Cosmo Street	Residential	Condominium - 230	47 DU	Proposed	375	4	17	21	16	8	24
26.	Redevelopment Project	Restaurant Theater	Quality Restaurant - 931	5,000 sf 5,000 sf	Proposed	563	6	4	10	10	7	17
27.	DRA Additional Rehab Project 6500 Hollywood Boulevard	Residential	Condominium - 230	60 DU	Proposed	353	4	22	26	21	9	31
	EAF-2011-1611 Drinking Place	Drinking Place	Drinking Place - 925	11,000 sf	Proposed	1,045	0	0	0	70	45	115
29.	EAF-2011-2228 Restaurant/Dance Club 5634 Hollywood Boulevard	Restaurant Dance Club	Source: Drain & Associates	6,075 sf 6,075 sf	Proposed	1,021	44	40	84	56	43	99
31.	[illegible]	Residential	Condominium - 230	42 DU	Proposed	324	3	15	18	14	7	21
30.	NL sec of Hollywood Blvd/world more Western to Avenue of the Stars	Mixed-Use	Condominium - 230 Shopping Center - 820	750 DU 7,000 sf	Proposed	3,928 357	12 4	58 3	70 7	56 12	27 14	83 26

[illegible] = illegible

ATTACHMENT 7 Pg 3

Table 23 (Continued)
Trip Generation Estimates for Related Projects

Map ID	Project Name/Location	Description/Land Use	ITE Land Use Code/Source	Size	Status[1]	Net Daily Trips	Net A.M. Peak Hour Trips			Net P.M. Peak Hour Trips		
							In	Out	Total	In	Out	Total
[illegible]	[illegible]	[illegible]	Driving Range	17,000 s	Proposed	1,462	0	0	0	61	40	101
34.	BAF-2003-0797 7420 N. Hudson Street	General Office	General Office - 710	25,000 s	Proposed	345	49	5	55	7	38	45
35.	[illegible] 7400 S. Glenoaks Boulevard	High-Turnover Restaurant	High-Turnover (Sit-Down) Restaurant - 932	12,000 s	Proposed	1,558	72	60	132	80	57	137
36.	BAF-2003-1550: Restaurant/Night Club 3001 Ow Lankershim Avenue	Restaurant Night Club	Drinking Place - 936 [illegible]	2,441 s	Proposed	2,111	1	0	0	137	76	213
37.	Polaris Apartments 5477 Santa Monica Boulevard	Residential	Convert 45 single-occupancy units to 27 efficiency units for HIV survivors		Under Construction							
38.	Commercial Development 7100 Santa Monica Boulevard	Commercial	Shopping Center - 820	146,000 sf	Proposed	10,500	104	69	262	440	480	720
39.	Elementary School 950 N. Mansfield	Elementary School	Elementary School - LAUSD Trip Generation Rate	550 Students	Proposed	N/A	44	34	78	0	0	0
40.	Primary School 1100 Tamarind Avenue	Primary School	Elementary School - LAUSD Trip Generation Rate	550 Students	Proposed	N/A	72	57	129	0	0	0
41.	High School 1500 Wilcox Road	High School	High School - LAUSD Trip Generation Rate	1,875 Students	Proposed	N/A	307	251	558	0	0	0
42.	BAF-2003-0846: Scientology Apartment Addition 1830 N. Bronson Avenue	Residence	Apartment - 220	45 DU	Proposed	302	5	19	35	19	10	29
[illegible]	[illegible] 5777 Hollywood Boulevard	Specialty Retail	Free-Standing Discount Superstore - 813 Specialty Retail - 814	5,000 sf 5,278 sf	Proposed	1,883	32	50	105	80	75	155
44.	Commercial Development 1540 S. Western Avenue	Commercial	Shopping Center - 820	17,934 sf	Proposed	509	7	5	12	21	23	44
45.	[illegible] [illegible]	Residence Shopping Center	Condominium - 230 Shopping Center - 820	140 DU 35,000 s	Proposed	1,227	17	80	97	70	56	126
46.	Elementary School 5601 Vineland Avenue	Elementary School	Elementary School - LAUSD Trip Generation Rate Central Region	569 Students	Proposed	N/A	114	90	204	0	0	0
47.	[illegible] [illegible]	Residence Retail	Apartment - 220 Shopping Center - 820	1,040 DU 175,000 sf	Proposed	7,002 7,515	106 110	426 70	531 180	420 510	230 341	650 850
48.	ENV-2005-561-EIR 16370, 16380 & 16400 Whittier Avenue	Residence	Condominium - 230	66 DU	Proposed	788	9	42	51	41	8	49
49.	ENV-2005-561-EIR/ZC-2005-556-ZC/HD-2005-557 1717 Vine Street	Residence Restaurant	Condominium - 230 Quality Restaurant - 831	87 DU 5,469 sf	Proposed	884	4 11	27 8	35 4	20 37	10 14	30 41
50.	ENV-2006-8470-[illegible] 11100 Laurel Canyon Boulevard	Residence	Condominium - 230	45 DU	Proposed	351	4	17	21	17	8	25
51.	ENV-2006-2777-[illegible] 1200 S. Bluffs Av. Davis	Residence	Apartment - 220	168 DU	Proposed	1,252	19	77	96	76	41	117
52.	ENV-2006-4248-[illegible] [illegible]	Specialty Retail	Specialty Retail - 814	11,800 sf	Proposed	400	7	7	14	14	19	33
53.	[illegible] [illegible]	Residence	Apartment - 220	110 DU	Proposed	759	11	45	56	44	24	68

[1] Proposed = Project is currently under review by the City of Los Angeles.
Under Construction = Project is currently under construction.

ATTACHMENT 7 Pg 4

Table 23 (Continued)
Trip Generation Estimates for Related Projects

Map ID	Project Name/Location	Description/Land Use	ITE Land Use Code/Source	Size	Status[1]	Net Daily Trips	Net A.M. Peak Hour Trips			Net P.M. Peak Hour Trips		
							In	Out	Total	In	Out	Total
54.	ENV-2008-[illegible]	Auto Club Quality Restaurant	[illegible]	56 seats/5,000 sf	Proposed	56	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
55.	Wood-Jac Development [illegible] Sunset Street	Residential [illegible]	Apartment - 220 Shopping Center - 820	44 DU 5,210 sf	Proposed	1,118	15	33	48	33	[illegible]	33
[illegible]	[illegible]	Residential [illegible]	Apartment - 220 Shopping Center - 820	42 DU 5,778 sf	Proposed	1,[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	26 25
57.	ENV-2008-[illegible]-2008-[illegible] [illegible] Sunset Boulevard	Pharmacy w/Drive-Through	Pharmacy w/Drive-Through - 881	16,000 sf	Proposed	1,411	25	18	43	68	70	138
58.	2008-CEN-1 Fl. [illegible] - Del Rey Middle School # Southwest corner of Sarnia Avenue/Fountain Avenue	Middle School	Elementary School - LAUSD The Generation Rate Control Region	861 Students	Proposed	920	140	107	247	0	0	0
59.	[illegible]	[illegible]	[illegible] - 220	143 DU	Proposed	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
60.	Dartmore Mini-Mart Project [illegible]	Mini-Mart/Gasoline Pumps	Service Station - 944	8 DU	Proposed	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
61.	Wood-Jac Development [illegible]	Residential	Condominium - 230	33 DU	Proposed	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
62.	ENV-2008-[illegible]-ZC-[illegible] [illegible]	Car Dealership	[illegible]	38,700 s	Proposed	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
63.	Condominium Conversion Project	Residential	Apartment - 220	122 DU	Pending	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
64.	[illegible]	Residential Retail	Apartment - 220 Specialty Retail - 814	52 DU 10,827 sf	Proposed	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
65.	Universal CityWalk [illegible]	Additional	Other Per Study - EIR 5 Period - 900	1,476 ksf of GLA	Proposed	[illegible]	1,020	280	1,300	780	1,120	1,900
66.	[illegible]	[illegible]	[illegible] - 220	340 DU	Proposed	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
67.	[illegible]	Residential	Low-Rise Condominium - 233	31 DU	Proposed	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
68.	[illegible]	Residential	Condominium - 230	257 DU	Proposed	1,506	23	98	121	93	[illegible]	[illegible]
69.	[illegible]	Residential	Apartment - 220	196 DU	Proposed	[illegible]	25	80	105	73	[illegible]	122
[illegible]	[illegible]	Studio Expansion	General Office - 710	[illegible]	Proposed	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
71.	[illegible] Wood-Jac Development (formerly listed as 2051 [illegible]	Residential General Office	Apartment - 220 General Office - 710	152 DU 12,000 sf	Proposed	1,152	11	67	78	63	[illegible]	68
72.	[illegible]	Residential	Apartment - 220	78 DU	Proposed	304	9	33	43	31	7	48
73.	[illegible]	Live/Work Studios	Condominium - 230	30 DU	Proposed	401	3	30	33	23	15	48
74.	[illegible]	Residential Retail	Apartment - 220 Shopping Center - 820	149 DU 4,410 sf	Proposed	[illegible]	120	67	31	60	[illegible]	61

[1] Status: Pending = Application has been submitted to the City, but is not deemed complete. Approved = Application has been deemed complete by the City, but has not been approved. Proposed = Application has been approved by the City, but is not yet under construction. Under Construction = Construction is underway, but project is not yet occupied. Occupied = Project is occupied.

METRO

ATTACHMENT 7 pg 5

Table 25 (Continued)
Trip Generation Estimates for Related Projects

Map ID	Project Name/Location	Description/Land Use	ITE Land Use Code/Source	Size	Status[1]	Net Daily Trips	Net A.M. Peak Hour Trips			Net P.M. Peak Hour Trips		
							In	Out	Total	In	Out	Total
75.	SPVC000-[illegible]	Mixed-Use	-	-	Proposed	NA	1,135	372	1,507	1,000	1,750	2,750
76.	2000 - SPVC4001 8111 N Sepulveda Boulevard	Mixed-Use	Condominium - 230 General Office - 710 Shopping Center - 820	374 DU 40,954 sf 15,000 sf	Proposed	884	20	99	119	101	99	199
77.	SPVC000-7 [illegible] Dunsmuir Street [illegible] N Sepulveda & Dunsmuir Street	Apartments Pharmacy	Apartment - 220 Pharmacy/Drugstore w/o Drive-Through Window - 881	191 DU 16,750 sf	Proposed	1,693	17	74	91	91	98	189
78.	SPVC000-770 - Condominium Project 11937 Nebraska Boulevard	Residential	Condominium - 230	107 DU	Proposed	540	24	66	90	56	47	103
79.	SPVC000-750 Sherman Village 12625 Riverside Drive	Residential	Condominium - 230	247 DU	Proposed	1,447	16	93	109	84	42	126
80.	SPVC000-[illegible] [illegible]	[illegible]	Apartment - 220	574 DU	Proposed	NA	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
81.	SPVC000-[illegible] [illegible]	[illegible] Drive-In Bank	[illegible] - 912	[illegible]	Proposed	NA	11	11	22	750	800	1,550
82.	SPVC000-44[illegible] Armenian Evangelical School 12625 Riverside Drive	Elementary School (K-12)	Private School (K-12) - 536	360 students	Proposed	NA	136	78	244	(338)	(434)	(772)
83.	SPVC0004-[illegible] Orange Knolls Apartments 12427 Riverside Drive	Residential	Apartment - 220 Senior Adult Housing-Attached - 252	102 DU 40 DU	Proposed	NA	11	45	56	44	23	67
84.	SPVC000-[illegible] Mixed-Use Project [illegible]	[illegible]	[illegible] School - 522	1,200 seats	Proposed	(1,860)	0.45	0.55	1.00	(1,000)	(1,000)	(2,000)
85.	SPVC000-15[illegible] Los Angeles Valley College 5800 Fulton Avenue	College	University/College - 550	2,000 enrollment	Proposed	5,474	401	87	488	210	120	330
86.	Mixed-Use Project on Square in Sherman Oaks 13600 Riverside Drive	Shopping Center Expansion	Shopping Center - 820	220,000 sf	Pending	NA	45	29	74	180	195	375
87.	SPVC000-[illegible] Mixed-Use Project 13100 Victory Boulevard	Apartments Shopping Center Health Club Fast-Food Restaurant	Apartment - 220 Shopping Center - 820 Health/Fitness Club - 492 Fast-Food w/Drive Through	100 DU 30,000 sf 40,000 sf 20,000 sf	Proposed	4,755	89	68	157	210	235	450
88.	SAP 2000-5400 14100 Ventura Boulevard	Mixed-Use	Apartment - 220 Shopping Center - 820 Quality Restaurant - 931	105 DU 17,000 sf (7,000 sf)	Proposed	1,125	45	57	102	50	42	92
89.	[illegible]	[illegible]	Apartment - 220 [illegible]	106 DU [illegible]	Proposed	NA	42	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
90.	SPVC000-104 Buckley School 5400 Stansbury Avenue	School	Elementary School - 520	100 students	Proposed	55	47	10	29	32	61	
91.	[illegible]	[illegible]	[illegible] Specialty Retail - 826	307 DU	Proposed	(811)	20	60	80	70	70	(140)
92.	MEND 000-[illegible] Sherman Oaks Square 14454 Van Nuys Boulevard	Residential	Apartment - 220	58 DU	Proposed	NA	10	40	50	40	21	61
93.	MEND 000-[illegible] Best Buy 4900 Van Nuys Boulevard	Electronics Superstore	Electronics Superstore - 863	30,000 sf	Proposed	NA	5	3	7	30	42	72
94.	SPVC000-661, Krysal European 5544 Van Nuys Boulevard	Car Dealership	New Car Sales - 841	40,852 sf	Proposed	NA	52	22	84	42	65	106

[1] Proposed = Project is under construction or has been approved by the City. Pending = Project has been submitted to the City for approval.

ATTACHMENT 7 Pg. 16

Table 23 (Continued)
Trip Generation Estimates for Related Projects

Map ID	Project Name/Location	Description/Land Use	ITE Land Use Code/Source	Size	Status[1]	Net Daily Trips	Net A.M. Peak Hour Trips			Net P.M. Peak Hour Trips		
							In	Out	Total	In	Out	Total
95.	SFV-2003-75, Nuves Acura 5700 Van Nuys Boulevard	Car Dealership	New Car Sales - 841	48,017 sf	Proposed	NA	65	22	88	45	69	114
96.	SFV-2003-455, Nuves Isuzu 5555 Van Nuys Boulevard	Car Dealership	New Car Sales - 841	78,270 sf	Proposed	NA	107	38	145	76	112	188
97.	SFV-2003-155 14417 Titus Street	Mixed-Use	-	-	Proposed	NA	42	60	102	144	135	279
98.	AMPAS Museum	Museum Expansion	EIR	-	Proposed	3,517	(28)	(38)	(66)	110	63	173
99.	Nordhoff/Wilbur Mixed-Use Development (includes 1.7 million sf of retail, commercial and residential development)	Mixed-Use	-	-	-	-	-	-	-	-	-	-
100.	VEN-2004-401, Il Villaggio Toscano 4811 Shoshone Boulevard	Residential Grocery Store Specialty Retail	Apartment - 220 Supermarket - 850 Specialty Retail - 814	500 DU 45,000 sf 10,000 sf	Proposed	NA	56	225	281	223	227	540
101.	SFV-2003-455, Emek Hebrew Academy Emek Hebrew Academy	School	Private School (K-12) - 536	225 students	Proposed	NA	114	93	207	41	54	95
102.	VEN-2004-447, LAUSD Academy K-8 School 15500 Hayvenhurst Street	Elementary School (K-8)	Private School (K-8) - 534	222 students	Proposed	NA	259	167	426	92	136	198
103.	VEN-2004-405, Valley Sofit Section Pre-School 15715 Ventura Boulevard	Pre-School	Day Care Center - 565	100 students	Proposed	NA	42	38	80	39	43	82
104.	SFV-2003-434, Land Rover Encino 15500 Ventura Boulevard	Auto Parts Center Auto Care Center	Automobile Parts Center - 843 Automobile Care Center - 942	3,308 sf 14,714 sf	Proposed	NA	33	18	51	36	36	72
105.	SFV-2003-471, California United Bank 15821 Ventura Boulevard	Bank	Source: Crain & Associates	6,400 sf	Proposed	NA	10	11	21	85	85	170
106.	EAR-2003-1544 18410 Sylvan Street	Private Elementary School	Elementary School - 520	16,020 sf	Proposed	307	75	63	138	87	85	172
107.	[illegible]	Day Care Commercial Space	Day Care Center - 565 Commercial Center - 820	3,000 sf 2,000 sf	Proposed	1,207	107	107	214	107	107	214
108.	EAR-2003-1745 [illegible]	McDonald's -	Fast-Food w/Drive Through - 934 -	3,955 sf 4,943 sf	Proposed	1,703	114	107	221	113	111	224
109.	EAR-2003-1765 140 N. La Brea Avenue	Shopping Center	Shopping Center - 820	18,610 sf	Proposed	789	12	7	19	34	36	70
110.	EAR-2003-1897 7024 Bevis Street	Tiberio Club Restaurant & Dance Hall	Quality Restaurant - 931	10,475 sf	Proposed	342	6	3	9	52	26	78
111.	EAR-2003-1910 2030 Reynolds Avenue	Restaurant & Bar w/Live Entertainment	Quality Restaurant - 931	5,035 sf	Proposed	459	2	2	4	25	13	38
112.	EAR-2003-1936 11114 Stacey Street	Private School & Day Care	Private School (K-8) - 534	-	Proposed	1,751	245	199	444	111	126	237
113.	EAR-2003-1950 7201 N. Glenoaks Boulevard	Hotel	Hotel - 310	58,628 sf	Proposed	392	23	20	43	28	29	57
114.	EAR-2003-2074 4201 Wilson Boulevard	Church Office	Church - 560 General Office - 710	38,250 sf 105,750 sf	Proposed	1,512	170	23	193	81	152	160
115.	EAR-2003-2047 11010 Morton Boulevard	McDonald's Gas Station w/Mini-Mart	Fast-Food w/Drive Through - 934 Gasoline/Service Station - 944	3,974 sf 1,768 sf	Proposed	1,503	53	30	183	71	65	136
116.	EAR-2003-2037 11500 Chalon Road	Pharmacy w/Drive thru	Pharmacy/Drugstore w/Drive-Through Window - 881	12,232 sf	Proposed	674	5	3	8	47	49	96

Attachment 7 Pg. 7

Table 26 (Continued)
Trip Generation Estimates for Related Projects

Map ID	Project Name/Location	Description/Land Use	ITE Land Use Code/Source	Size	Status[1]	Net Daily Trips	Net A.M. Peak Hour Trips			Net P.M. Peak Hour Trips		
							In	Out	Total	In	Out	Total
117.	EAF-2003-1641 1674 N Bronson Avenue	Mini-Mart & Liquor Store	Convenience Market - 851	3,960 sf	Proposed	2,657	63	60	118	67	64	131
118.	2004-CEN-1935 807 N Rutina Avenue	Apartments Retail	Apartment - 220 Shopping Center - 820	93 DU 15,926 sf	Proposed	1,502	9	37	46	86	45	132
119.	EAF-2004-1634 363 La Cienega Boulevard	Private School	Private School (K-12) - 536	140 students	Proposed	143	75	50	125	12	16	28
120.	EAF-2004-0758 5629 Melrose Avenue	Apartments Retail	Apartment - 220 Shopping Center - 820	54 DU 16,000 sf	Proposed	351	4	16	20	27	14	41
121.	EAF-2004-4695 322 Alvarado Avenue	Apartments Retail	Apartment - 220 Shopping Center - 820	53 DU 13,500 sf	Proposed	735	9	26	35	45	23	68
122.	EAF-2004-5590/2005-CEN-1379, Mixed-Use Project 151 N La Cienega Boulevard	Condos Apartments Restaurant Retail	Condominium - 230 Apartment - 220 High-Turnover (Sit-Down) Restaurant - 932 Shopping Center - 820	62 DU 177 DU 38,739 sf 318,275 sf	Proposed	1,059	38	25	63	33	33	66
123.	EAF-2004-7089 3239 3rd Street	Apartments	Apartment - 220	300 DU	Proposed	768	21	132	153	73	39	112
124.	EAF-2004-7534 333 La Peer Boulevard	Church	Church - 560	132,440 sf	Proposed	1,207	51	44	95	45	42	87
125.	EAF-2005-1424 333 S Manhattan Place	Private Elementary School	Private School (K-8) - 534	22,790 sf	Proposed	799	45	37	82	0	0	0
126.	2004-CEN-5460, Miracle Center 5411 Wilshire Boulevard	Mixed-Use	Shopping Center - 820 Fast Food - 933 Apartment - 220	26,050 sf 2,500 sf 100 DU	Proposed	1,702	27	107	135	62	45	107
127.	2004-CEN-5460 7550 W Sunset Boulevard	Sunset Landey Lofts	Condominium - 230 Shopping Center - 820	168 DU 12,931 sf	Proposed	2,475	16	80	96	130	64	194
128.	2004-CEN-5460, Park La Brea 5500 Wilshire Boulevard	Apartments	Apartment - 220	300 DU	Proposed	768	21	132	153	73	39	112
129.	2004-CEN-1002 5601 Wilshire Boulevard	Mixed-Use	Apartment - 220 Quality Restaurant - 931 Shopping Center - 820	238 DU 4,000 sf 8,500 sf	Proposed	2,215	32	125	157	127	68	195
130.	2004-CEN-1057 565 S Oxford Street	LACMA - Ogden St Vacation between Wilshire & 6th	-	-	Proposed	552	26	27	53	31	30	61
131.	2004-CEN-1058 515 N La Brea Avenue	Mixed-Use	Apartment - 220 Shopping Center - 820	205 DU 45,300 sf	Proposed	3,458	23	94	117	214	116	330
132.	2004-CEN-2051 210 N Hamilton Drive	Private School	Private School (K-8) - 534	170 student	Proposed	N/A	94	68	162	22	25	47
133.	2004-CEN-4756, Desmond's Tower Residential Development 5600 W Wilshire Boulevard	Apartments	Apartment - 220	175 DU	Proposed	920	13	51	64	51	28	79
134.	ENV-2005-5955-EIR/2005-CEN-1935 4500 W Los Feliz Boulevard	Mixed-Use	Condominium - 230 Supermarket - 850 Shopping Center - 820 Quality Restaurant - 931	50 DU 40,000 sf 7,441 sf 4-12,1701 sf	Proposed	1,601	19	90	109	110	57	173
135.	2004-CEN-1058 456 S Wilton Avenue	Mixed-Use	-	-	Proposed	3,048	32	91	93	103	115	238

City of Los Angeles
Draft Environmental Impact Report

NBC Universal Evolution Plan
November 2010

Page 783

ATTACHMENT 7 pg 8

Table 25 (Continued)
Trip Generation Estimates for Related Projects

Map ID	Project Name/Location	Description/Land Use	ITE Land Use Code/Source	Size	Status[1]	Net Daily Trips	Net A.M. Peak Hour Trips			Net P.M. Peak Hour Trips		
							In	Out	Total	In	Out	Total
[illegible]	[illegible]	Condominium	Condominium - 230	34 DU	Proposed	310	4	20	24	19	7	26
137.	ENV-2006-3193-EIR 5420 W Sunset Boulevard	Gas Station	Gasoline/Service Station - 944	10 pump	Proposed	1,696	60	61	121	89	79	168
138.	2004-CEN-3120 2000 N Fuller Avenue	Runyon Canyon Parking Lot	-	80 spaces	Proposed	NA	62	8	70	18	38	70
139.	ENV-2006-2179-ND/2005-CEN-3092 5041 W Sunset Boulevard	General Office	General Office - 710	120,000 sf	Proposed	1,222	144	22	166	30	145	170
140.	2001-CEN-3175 5221 W Hollywood Boulevard	Mixed-Use	Shopping Center - 820 Apartment - 220	150,777 sf 562 DU	Proposed	5,387	93	340	477	324	230	554
141.	ENV-2006-3015-MND 5915 W Melrose Avenue	Mixed-Use	Condominium - 230 Shopping Center - 820	15 DU 7,500 sf	Proposed	368	3	12	14	23	12	35
142.	ENV-2005-4178-EAF/2006-CEN-3251, Old Spaghetti Factory 5930 W Sunset Boulevard	Sunset & Gordon Mixed-Use	Quality Restaurant - 931 Condominium - 230 General Office - 710 High-Turnover (Sit-Down) Restaurant - 932 Shopping Center - 820	(-13,500) sf 311 DU 40,000 sf 6,500 sf 5,000 sf	Proposed	842	41	230	341	38	7	92
143.	[illegible] [illegible] Vine Street	Sunset & Vine Mixed-Use	Apartment - 220 Shopping Center - 820	206 DU 58,000 sf	Proposed	3,048	27	103	130	101	120	221
144.	2004-CEN-3165 2050 W Hollywood Boulevard	Hollywood & Vine Mixed-Use	Apartment - 220 Condominium - 230 Hotel - 310 Quality Restaurant - 931 Specialty Retail - 814	375 DU 150 DU 200 rooms 46,500 sf 12,000 sf	Proposed	6,275	68	340	476	259	140	399
145.	[illegible] [illegible]	[illegible]	Apartment - 220 General Office - 710	75 DU 33,000 sf	Proposed	304	3	11	14	21	8	29
146.	ENV-2006-4634-EA 5417 W Selma Avenue	Restaurant/Night Club	Drinking Place - 936	12,640 sf	Proposed	1,155	9	1	10	63	13	96
147.	Section 8 Senior Housing Project [illegible]	Mixed-Use	Senior Adult Housing-Attached - 252 Recreational Community Center - 495 Shopping Center - 820 Live Theater - 441	106 DU 6,500 sf 10,000 sf 5,000 sf	Proposed	3,722	26	94	92	240	159	409
148.	2003-CEN-4165 151 S La Brea Avenue	La Brea Urban Lofts (Mixed-Use)	Apartment - 220 Shopping Center - 820 Quality Restaurant - 931	118 DU 25,490 sf 3,000 sf	Proposed	1,503	13	50	63	60	32	92
149.	ENV-2005-2003-EA 755 S Curson Avenue	Restaurant General Office	Quality Restaurant - 931 General Office - 710	900 sf 38,000 sf	Proposed	419	48	6	54	9	43	52
150.	[illegible] [illegible] Hollywood Boulevard	Drinking Place Restaurant	Drinking Place - 936 Quality Restaurant - 931	10,000 sf 749 sf	Proposed	1,472	9	9	6	73	42	115
151.	ENV-2005-2023-EA 5630 W Alfred Avenue	Condominiums Retail	Condominium - 230 Shopping Center - 820	66 DU 3,350 sf	Proposed	707	6	37	45	43	27	69
152.	2004-CEN-4245 5901 W Hollywood Boulevard	Retail General Office	Shopping Center - 820 General Office - 710	26,230 sf 15,720 sf	Proposed	982	17	11	28	30	12	42

City of Los Angeles
Draft Environmental Impact Report

NBC Universal Evolution Plan
November 2010

Page 754

ATTACHMENT 7 Ag 9

Table 26 (Continued)
Trip Generation Estimates for Related Projects

Map ID	Project Name/Location	Description/Land Use	ITE Land Use Code/Source	Size	Status[1]	Net Daily Trips	Net A.M. Peak Hour Trips			Net P.M. Peak Hour Trips		
							In	Out	Total	In	Out	Total
153.	2006-CEN-2054 100 N Vermont Avenue	Hit Tour Project (Mixed-Use)	Shopping Center - 820 Supermarket - 850 Apartment - 220	40,800 sf 48,000 sf 167 DU	Proposed	3,592	91	103	194	230	130	360
154.	2006-CEN-2762 5800 W Pico Street	Third Street Mixed-Use Project	Apartment - 220 Shopping Center - 820	60 DU 5,850 sf	Proposed	482	9	22	31	21	16	47
155.	2007-CEN-2087 5900 W Wilshire Boulevard	General Office Restaurant	General Office - 710 High-Turnover (Sit-Down) Restaurant - 932 Quality Restaurant - 931	7,000 sf 3,500 sf 15,510 s	Proposed	1,122	16	15	32	66	32	97
156.	[illegible] [illegible]	Mixed-Use	Condominium - 230 Shopping Center - 820	246 DU 12,300 sf	Proposed	1,015	9	19	28	44	21	65
157.	2007-CEN-2078 [illegible]	Residential	Condominium - 230	42 DU	Proposed	246	3	13	16	15	7	22
158.	2007-CEN-2079 7929 W Hollywood Boulevard	Temple Israel of Hollywood Expansion	Private School (K-8) - 534 Church - 560	75 students 5,000 sf	Proposed	218	07	31	38	9	9	18
159.	2007-CEN-2573 8677 W Santa Monica Boulevard	Mixed-Use	Mid-Rise Apartment - 221 Shopping Center - 820 Quality Restaurant - 931	737 DU 12,700 s 9,908 sf	Proposed	1,944	86	210	296	170	122	292
160.	Hawthorn Avenue between Orange Drive & Highland Avenue	Mixed-Use			Planning	-	-	-	-	-	-	-
161.	Nella Bella Mixed-Use [illegible]	Residential Retail	Apartment - 220 Shopping Center - 820	108 DU 2,075 sf	Proposed	565	11	33	46	41	24	65
162.	Nella Artwalk 1178 S Orange Grove Ave	Residential Retail	Condominium - 230 Shopping Center - 820	1,233 DU 38,000 sf	Proposed	4,905	120	347	467	343	84	427
163.	EAF 2007-171-EIR [illegible]	Office Restaurant	General Office - 710 High-Turnover (Sit-Down) Restaurant - 932	197,595 sf 4,000 sf	Proposed	2,697	297	69	366	56	352	310
164.	ENV-2006-6041-EIR 8201 Wilshire Street	Residential Office Live/Work	Condominium - 230 General Office - 710	65 DU 13,790 sf 10 DU	Proposed	384	9	22	35	22	10	32
165.	Capitol Records Site [illegible]	Office	General Office - 710	490,000 sf	Proposed	2,404	546	74	620	131	435	566
166.	[illegible] Forest Lawn Memorial Park	Cemetery-related Uses			Proposed	-	-	-	-	-	-	-
167.	Griffith Park Master Plan 4730 Crystal Springs Drive	Park-related Uses	-	-	Proposed	-	-	-	-	-	-	-
168.	LADWP River Supply Conduit Improvement Upper Reach	Water Improvement Project	-	-	Proposed	-	-	-	-	-	-	-
169.	LADWP Silver Lake Reservoir Complex Storage Replacement Project Headworks	Water Improvement Project	-	-	Proposed	-	-	-	-	-	-	-
170.	Headworks Area Ecosystem Restoration	Water Improvement Project	-	-	Proposed	-	-	-	-	-	-	-
					SUBTOTAL - CITY OF LOS ANGELES RELATED PROJECTS	243,130	10,392	10,857	20,746	14,031	13,113	27,194
CITY OF WEST HOLLYWOOD												
1.	Sunset Boulevard & Doheny Street	Mixed-Use	EIR	-	Proposed	951	24	28	52	26	40	66

** TRAFFIC HAULING ISSUE

ATTACHMENT 7 pg 10

Table 25 [Continued]
Trip Generation Estimates for Related Projects

Map ID	Project Name/Location	Description/Land Use	ITE Land Use Code/Source	Size	Status[1]	Net Daily Trips	Net A.M. Peak Hour Trips			Net P.M. Peak Hour Trips		
							In	Out	Total	In	Out	Total
5.	40-room addition to existing hotel 1200 Nth. Vine Road	Hotel	Hotel - 310	40 Rooms	Proposed	357	14	8	22	15	11	24
6.	Condominium Development 1140 Highland Road	Residential	Condominium - 230	10 DU	Proposed	59	1	3	4	3	2	5
7.	Mixed-use Development 001 Hancock Avenue	Mixed-Use	Condominium - 230; Shopping Center - 820;	40 DU; 12,500 sf of retail	Proposed	1,050	33	37	65	43	35	61
8.	Condominium Development 1285 Hancock Avenue	Residential	Condominium - 230	40 DU	Proposed	354	5	15	18	14	7	21
9.	Condominium Development 1287 Hancock Drive	Residential	Condominium - 230	10 DU	Proposed	70	1	4	5	4	2	5
7.	Apartment Development 1284 Hancock Avenue	Residential	Apartment - 220	53 DU	Proposed	356	5	22	27	21	12	33
8.	Apartment Development 1340 Hancock Avenue	Residential	Apartment - 220	53 DU	Proposed	109	2	6	8	6	4	10
9.	Condominium Development 9788 Shoreham Drive	Residential	Condominium - 230	15 DU	Proposed	88	1	6	7	5	3	8
10.	Office Development 9387 Melrose Avenue	Office	General Office - 710	400,000 sf	Proposed	4,404	346	74	320	101	435	536
11.	Melrose Triangle, Mixed-use Development 8340 Santa Monica Boulevard	Mixed-Use	Condominium - 230; Shopping Center - 820	191 DU; 71,000 sf of commercial; 217,200 sf of office space	Proposed	4,963	53	119	206	206	312	450
12.	Commercial Development 8905 Sunset Boulevard	Commercial	Specialty Retail - 814; Quality Restaurant - 931	2,512 sf of retail; 10,000 sf of restaurant	Proposed	1,055	6	15	21	55	33	85
13.	Luxury Hotel 8700 Sunset Boulevard	Residential and Hotel	Condominium - 230; Hotel - 310	-	Proposed	1,604	37	45	112	62	56	118
14.	Condominium Development 1254 Harper Avenue	Residential	Apartment - 220; Condominium - 230	16 Condominiums and demolish 10 Apartments	Proposed	19	1	0	1	0	1	1
15.	Condominium Development 305 Knox Road	Residential	Condominium - 230	15 DU	Proposed	105	1	7	8	6	3	9
16.	Condominium Development 1140 Formosa Avenue	Residential	Condominium - 230	11 DU	Proposed	64	1	2	3	4	2	6
17.	Residential Development 848 San Vicente Boulevard	Residential	Condominium - 230; Senior Adult Housing-Attached - 252	135 Condominiums; 42 Senior Housing Units	Proposed	887	12	50	62	50	25	75
18.	Condominium Development 8750 Shoreham Drive	Residential	Condominium - 230	10 DU	Proposed	70	1	3	5	4	2	5
19.	Commercial Development 8380 Melrose Avenue	Retail	Specialty Retail - 814	3,300 sf	Proposed	445	9	4	10	12	15	27
20.	Condominium Development 1220 Orange Grove Avenue	Residential	Condominium - 230	10 DU	Proposed	70	1	2	3	4	2	6
21.	Mixed-use Development 8120 Santa Monica Boulevard	Mixed-Use	Condominium - 230; Specialty Retail - 814	58 DU; 15,800 sf of retail	Proposed	777	11	15	26	25	25	50
22.	Condominium Development 1285 Lamboa Street	Residential	Condominium - 230	15 DU	Proposed	75	1	5	6	5	2	7

ATTACHMENT 7 of 11

Table 23 (Continued)
Trip Generation Estimates for Related Projects

Map ID	Project Name/Location	Description/Land Use	ITE Land Use Code/Source	Size	Status[1]	Net Daily Trips	Net A.M. Peak Hour Trips			Net P.M. Peak Hour Trips		
							In	Out	Total	In	Out	Total
23.	Condominium Development 1060 Vermont Avenue	Residential	Condominium - 230	17 DU	Proposed	100	1	6	7	6	3	9
24.	Commercial Development 3065 Santa Monica Boulevard	Retail	Specialty Retail - 814	35,237 sf	Proposed	4,429	77	50	127	376	203	579
25.	Commercial Development 3080 Melrose Avenue	Retail	Specialty Retail - 814	3,382 sf	Proposed	306	4	3	7	8	11	19
26.	Condominium Development 1000 N Swall oer Avenue	Residential	Condominium - 230	7 DU	Proposed	59	1	3	4	3	2	5
27.	Mixed-use Development 900 Santa Monica Boulevard	Mixed-Use	Condominium - 230; Shopping Center - 820	42 DU; 21,000 sf of retail	Proposed	1,177	16	24	40	40	39	79
28.	Mixed-use Development 912 Westmount Drive	Mixed-Use	Condominium - 230; Shopping Center - 820	5 DU; 2,300 sf of retail	Proposed	160	1	3	4	3	5	14
29.	Mixed-use Development 9051 Norma Street	Mixed-Use	Condominium - 230; Specialty Retail - 814	1 DU 9,930 sf of retail	Proposed	117	2	2	4	5	5	10
30.	Mixed-use Development 9052 Norma Street	Mixed-Use	Condominium - 230; Specialty Retail - 814	4 DU; 20,165 sf of retail	Proposed	224	5	4	7	11	8	19
31.	Condominium Development 9025 Wilcoxon Avenue	Residential	Condominium - 230	17 DU	Proposed	100	1	4	5	3	3	6
32.	Commercial Development 8900 Sunset Boulevard	Retail	Shopping Center - 820	16,785 sf	Proposed	721	6	5	10	41	22	63
33.	Condominium Development 1166 La Cienega Boulevard	Residential	Condominium - 230	14 DU	Proposed	82	1	5	6	5	2	7
34.	Condominium Development 1040 Fairfax Avenue	Residential	Condominium - 230	23 DU	Proposed	156	1	6	7	8	4	12
35.	Condominium Development 9017 Nemo Avenue	Residential	Condominium - 230	9 DU	Proposed	11	0	1	1	1	1	2
36.	Mixed-use Development 8800 Santa Monica Boulevard	Mixed-Use	Condominium - 230; Shopping Center - 820	19 DU; 8,700 sf of retail	Proposed	486	5	7	12	29	15	43
37.	Mixed-use Development 9100 Sunset Boulevard	Mixed-Use	General Office - 710; Quality Restaurant - 931	6,566 sf of office; 6,836 sf of restaurant	Proposed	470	5	2	5	41	21	62
38.	Commercial Development 9200 Sunset Boulevard	Restaurant	Quality Restaurant - 931	6,744 sf	Proposed	452	4	0	4	33	17	50
39.	Commercial Development 9445 Melrose Avenue	Retail	Shopping Center - 820	2,360 sf	Proposed	122	1	1	2	7	4	11
40.	Mixed-use Development 9460 Sunset Boulevard	Mixed-Use	Apartment - 220; Hotel - 310; Shopping Center - 820	199 DU; 256 rooms; 35,440 sf of retail	Proposed	5,167	105	109	214	274	147	421
41.	Condominium Development 1040 Beaudry Avenue	Residential	Condominium - 230	5 DU	Proposed	29	0	1	1	2	1	3
42.	Condominium Development 944 Stanley Avenue	Residential	Condominium - 230	4 DU	Proposed	29	0	1	1	2	1	3
43.	Commercial Development 8711 Melrose Avenue	Retail	Shopping Center - 820	9,268 sf	Proposed	425	5	3	8	24	13	37
44.	Condominium Development 9425 Peamon Avenue	Residential	Condominium - 230	7 DU	Proposed	41	0	2	2	2	1	4

ATTACHMENT 7 A912

Table 23 (Continued)
Trip Generation Estimates for Related Projects

Map ID	Project Name/Location	Description/Land Use	ITE Land Use Code/Source	Size	Status[1]	Net Daily Trips	Net A.M. Peak Hour Trips			Net P.M. Peak Hour Trips		
							In	Out	Total	In	Out	Total
45.	Condominium Development 808 Hamley Drive	Residence	Condominium - 230	3 DU	Proposed	18	0	1	1	1	1	2
46.	Commercial Development 48 Beloit Drive	Retail	Shopping Center - 820	4,850 sf	Proposed	209	2	2	4	12	16	28
47.	Condominium Development 808 Sweetzer Avenue	Residence	Condominium - 230	4 DU	Proposed	25	0	1	1	1	1	2
48.	Condominium Development 1155 Fuller Avenue	Residence	Condominium - 230	5 DU	Proposed	29	0	1	1	2	1	3
49.	Condominium Development 1048 Havenhurst Drive	Residence	Condominium - 230	6 DU	Proposed	27	0	2	3	1	1	3
50.	Mixed-use Development 8350 Santa Monica Boulevard	Mixed-Use	Apartment - 220; Shopping Center - 820	30 DU; 7,100 sf of retail	Proposed	436	4	8	12	25	13	38
51.	Condominium Development 9008 Yoakum Avenue	Residence	Condominium - 230	3 DU	Proposed	18	0	1	1	1	1	2
52.	Condominium Development 1122 Kings Road	Residence	Condominium - 230	10 DU	Proposed	59	1	3	4	3	2	5
53.	Condominium Development 1045 Genesee Avenue	Residence	Condominium - 230	3 DU	Proposed	18	0	1	1	1	1	2
54.	Apartment Development 8355 Keith Avenue	Residence	Apartment - 220	3 DU	Proposed	20	0	1	1	1	1	2
55.	Mixed-use Development 8416 Sunset Boulevard	Mixed-Use	Apartment - 220; Condominium - 230; Hotel - 310	45 DU; 145 rooms	Proposed	1,455	40	33	76	73	39	112
56.	Commercial Development 8901 Sunset Boulevard	Retail	Shopping Center - 820	52,000 sf	Proposed	2,115	5	8	13	12	7	19
57.	Condominium Development 1057 Detroit Street	Residence	Condominium - 230	7 DU	Proposed	41	0	2	3	3	1	4
58.	Mixed-use Development 7700 Santa Monica Boulevard	Mixed-Use	Apartment - 220; Condominium - 230; Shopping Center - 820	370 DU; 33,500 sf of retail	Proposed	3,200	33	97	130	166	99	264
59.	Mixed-use Development 8512 Santa Monica Boulevard	Mixed-Use	Apartment - 220; Shopping Center - 820	-	Proposed	34	0	2	2	2	1	3
60.	Commercial Development 924 La Cienega Boulevard	Retail	Shopping Center - 820	20,730 sf	Proposed	893	10	6	16	51	27	78
61.	Commercial Development 8964 Melrose Avenue	Retail	Shopping Center - 820	9,303 sf	Proposed	399	4	3	7	21	11	32
62.	Condominium Development 8975 Gentle Street	Residence	Condominium - 230	2 DU	Proposed	12	0	1	1	1	0	1
63.	Mixed-use Development 9010 Sunset Boulevard	Mixed-Use	General Office - 710; Specialty Retail - 814; High-Turnover (Sit-Down) Restaurant - 932	47,930 sf of office; 10,055 sf of retail; 5,480 sf of restaurant	Proposed	723	33	15	47	83	47	130
64.	Commercial Development 8972 Sunset Boulevard	Retail	Specialty Retail - 814	9,935 sf	Proposed	445	6	4	10	12	15	27
					SUBTOTAL - CITY OF WEST HOLLYWOOD RELATED PROJECTS	40,900	1,182	895	2,077	2,133	1,799	3,932
CITY OF GLENDALE												
1.	Glendale Town Center (Americana at Brand) bounded by Harvard Street and Galleria to north	Cinema Restaurant	Multiplex Movie Theater - 445 Quality Restaurant - 931	3,520 Seats 36,500 sf	Under Construction	N/A 3,362	0 27	0 27	0 54	101 204	178 134	280 338

ATTACHMENT 7 May 13

Table 25 (Continued)
Trip Generation Estimates for Related Projects

Map ID	Project Name/Location	Description/Land Use	ITE Land Use Code/Source	Size	Status[1]	Net Daily Trips	Net A.M. Peak Hour Trips			Net P.M. Peak Hour Trips		
							In	Out	Total	In	Out	Total
	Colorado Street to the south, Brand Boulevard to the east, and Central Avenue to the west	Retail	Shopping Center - 820	165,500 sf		7,205	106	68	174	303	326	629
		Promotional Retail	Shopping Center - 820	170,000 sf		7,300	107	68	175	305	330	635
		Residential	Condominium - 230	100 DU		566	7	37	44	35	17	52
		Residential	Apartment - 220	268 DU		1,365	34	97	131	66	42	108
2.	Disney - Glendale Central Creative Campus 1201 Flower Street	Office	General Office - 710	250,000 sf	Under Construction	2,701	343	47	390	51	338	389
3.	Kem's Brand Mixed-Use Development Bisected a bounded by SR 134 Freeway, Orion Street, Brand Boulevard, and Louise Avenue Boulevard, and Louise Avenue	Residential	Condominium - 230	724 DU	Proposed	4,243	54	285	339	252	124	376
		Residential	Townhouse - 230	23 DU		164	2	10	12	10	5	15
		Retail	Shopping Center - 820	75,000 sf		3,221	47	30	77	135	145	280
		Office	General Office - 710	45,200 sf		721	87	12	99	11	86	97
		Hotel	Hotel - 310	448 Rooms		3,980	153	98	251	140	2	142
4.	Glendale Downtown Specific Plan	-	-	-	-	-	-	-	-	-	-	-
					SUBTOTAL - CITY OF GLENDALE RELATED PROJECTS	37,412	557	752	1,716	1,734	1,714	3,448
					TOTAL - ALL RELATED PROJECTS	335,184	15,715	13,519	29,234	19,029	20,603	39,632

[1] As individual projects are constructed their status may be different from that shown in this table.

Sources:
City of Glendale Planning Department & Glendale Redevelopment Agency
City of Los Angeles Planning Department & Department of Transportation
City of Burbank Planning Department
City of Los Angeles & City of Burbank websites
Environmental Impact Reports & Traffic Impact Studies

ATTACHMENT 7 Pg 14

Response to Comment No. 12-393

Attachment 7 consists of a copy of Table 26 from pages 756–769 of the Draft EIR, with notations added by the commenter regarding "traffic hauling issue", and is referenced in Comment Nos. 12-237 and 12-238. The commenter is referred to Response to Comment Nos. 12-237 and 12-238, above.

Comment No. 12-394

See next page

ATTACHMENT 8

Intersection Peak Hour Levels of Service

No.	Intersection	Peak Hour	V/C or Delay	LOS
1.	Collins Avenue & Ventura Boulevard	A.M.	0.770	C
		P.M.	1.012	F
2.	Kraft Avenue/SR 170 SB Off-Ramp & Riverside Drive	A.M.	0.663	B
		P.M.	0.613	B
3.	Tujunga Avenue & Riverside Drive/Camarillo Street	A.M.	1.171	F
		P.M.	1.126	F
4.	Tujunga Avenue & Ventura Boulevard	A.M.	0.830	D
		P.M.	0.911	E
5.	Laurel Canyon Boulevard & Ventura Boulevard	A.M.	0.807	D
		P.M.	0.669	B
6.	Lankershim Boulevard & Magnolia Boulevard	A.M.	1.197	F
		P.M.	1.107	F
7.	Studio City Place & Ventura Boulevard	A.M.	0.617	B
		P.M.	0.683	B
8.	Vineland Avenue & Magnolia Boulevard	A.M.	1.101	F
		P.M.	1.402	F
9.	Vineland Avenue/Lankershim Boulevard & Camarillo Street	A.M.	1.351	F
		P.M.	1.205	F
10.	Vineland Avenue & Riverside Drive	A.M.	1.124	F
		P.M.	0.820	D
11.	Vineland Avenue & Moorpark Street	A.M.	1.127	F
		P.M.	1.956	F
12.	Vineland Avenue & Whipple Street	A.M.	0.590	A
		P.M.	0.446	A
13.	Vineland Avenue & US 101 NB Off-Ramp	A.M.	0.484	A
		P.M.	0.405	A
14.	Vineland Avenue & Ventura Boulevard	A.M.	1.027	F
		P.M.	1.049	F
15.	SR 134 EB On-Ramp e/o Vineland Avenue & Riverside Drive	A.M.	**	F
		P.M.	**	F
16.	Plaza Parkway & Ventura Boulevard	A.M.	0.804	D
		P.M.	0.539	A
17.	Riverton Avenue/Campo de Cahuenga Way & Ventura Boulevard	A.M.	0.640	B
		P.M.	0.616	B
18.	Lankershim Boulevard & SR 134 WB Off Ramp	A.M.	0.835	D
		P.M.	0.597	A
19.	Lankershim Boulevard & Riverside Drive	A.M.	1.259	F
		P.M.	1.080	F
20.	Lankershim Boulevard & Moorpark Street	A.M.	1.368	F
		P.M.	1.178	F
21.	Lankershim Boulevard & Whipple Street	A.M.	0.951	E
		P.M.	0.489	A
22.	US 101 NB Ramps & Campo de Cahuenga Way	A.M.	0.235	A
		P.M.	0.667	B
23.	Metro Driveway & Campo de Cahuenga Way	A.M.	0.202	
		P.M.	0.607	B
24.	Cahuenga Boulevard & Magnolia Boulevard	A.M.	1.026	F
		P.M.	1.403	F
25.	Cahuenga Boulevard & Huston Street	A.M.	0.940	E
		P.M.	0.640	A
26.	Cahuenga Boulevard & Camarillo Street	A.M.	1.489	F
		P.M.	1.278	F

* OUTSIDE OF STUDIO CITY

ATTACHMENT 8 Pg2

Intersection Peak Hour Levels of Service

No.	Intersection	Peak Hour	V/C or Delay	LOS
27. [a]	Cahuenga Boulevard &	A.M.	0.702	C
	SR 134 WB Off-Ramp	P.M.	0.556	A
28. [a]	Cahuenga Boulevard &	A.M.	0.924	E
	SR 134 EB Ramps	P.M.	0.969	E
29. [a]	Cahuenga Boulevard &	A.M.	1.158	F
	Riverside Drive	P.M.	1.291	F
30. [a]	Cahuenga Boulevard &	A.M.	1.047	F
	Moorpark Street	P.M.	1.117	F
31. [a]	Cahuenga Boulevard &	A.M.	0.656	B
	Whipple Street	P.M.	0.692	B
32. [c]	Cahuenga Boulevard &	A.M.	**	F
	Valley Spring Lane	P.M.	**	F
33. [a]	Lankershim Boulevard &	A.M.	0.837	D
	Cahuenga Boulevard	P.M.	0.636	B
34. [a]	Lankershim Boulevard &	A.M.	0.715	C
	Valleyheart Drive/Camino Stewart Avenue	P.M.	[illegible]	[illegible]
35. [a]	Lankershim Boulevard &	A.M.	0.880	D
	Chandler Street	P.M.	0.760	C
36. [a]	Lankershim Boulevard &	A.M.	1.034	F
	Campo de Cahuenga Way/Universal Hollywood Drive	P.M.	1.375	F
37. [a]	Lankershim Boulevard &	A.M.	0.937	E
	US 101 NB Off-Ramp	P.M.	0.977	E
38. [a,c]	Lankershim Boulevard &	A.M.	0.952	E
	Ventura Boulevard/Cahuenga Boulevard	P.M.	0.911	E
39. [a]	US 101 SB Ramps/Regal Place &	A.M.	0.846	D
	Cahuenga Boulevard	P.M.	0.810	D
40. [a]	Ledge Avenue/Moorpark Way &	A.M.	1.070	F
	Riverside Drive	P.M.	1.067	F
41. [a]	Forman Avenue &	A.M.	0.798	C
	Riverside Drive	P.M.	0.901	F
42. [a]	Broadlawn Drive &	A.M.	0.661	B
	Cahuenga Boulevard	P.M.	0.447	A
43. [a]	Universal Center Drive/Universal Studios Boulevard &	A.M.	0.397	A
	Buddy Holly Drive	P.M.	0.692	D
44. [a]	Universal Studios Boulevard &	A.M.	0.668	B
	Cahuenga Boulevard	P.M.	0.724	C
45. [a]	Oakshire Drive &	A.M.	0.718	C
	Cahuenga Boulevard	P.M.	0.776	C
46. [a]	US 101 SB Ramps w/o Barham Boulevard/Cahuenga	A.M.	1.225	F
	Boulevard & Cahuenga Boulevard	P.M.	1.368	F
47. [a]	Barham Boulevard &	A.M.	1.072	F
	Cahuenga Boulevard	P.M.	1.356	F
48. [a,c]	Barham Boulevard &	A.M.	1.109	F
	Buddy Holly Drive/Cahuenga Boulevard	P.M.	1.323	F
49. [a]	Oakcrest Drive &	A.M.	0.973	E
	Cahuenga Boulevard	P.M.	0.725	C
50. [a]	Mulholland Drive &	A.M.	1.051	F
	Cahuenga Boulevard	P.M.	1.061	F
51. [a]	Cahuenga Boulevard &	A.M.	0.869	D
	Hillpark Drive	P.M.	0.725	C
52. [a]	Barham Boulevard &	A.M.	1.028	F
	De Wilt Drive	P.M.	1.005	F

ALL THESE INTERSECTIONS DEGRADE FROM A/A (DUE AT C/B) TO ABOVE STUDY LEVELS WITHOUT THE EVOLUTION PROJECT, DUE TO PROPOSED AREA DEVELOPMENT -- PARTICULARLY NEAR UNIVERSAL

SEE TABLE 2.6

ATTACHMENT 8 Pg 3

Table 2.B-1 (Continued)
Cumulative Plus Project Conditions (Year 2030)
Intersection Peak Hour Levels of Service

No.	Intersection	Peak Hour	V/C or Delay	LOS
53. [a]	Barham Boulevard &	A.M.	1.168	F
	Lake Hollywood Drive	P.M.	1.093	F
54. [a]	Barham Boulevard &	A.M.	1.049	F
	Coyote Canyon Road	P.M.	0.927	E
55. [a]	Barham Boulevard &	A.M.	1.352	F
	Lakeside Plaza Drive/Forest Lawn Drive	P.M.	1.204	F
56.	Warner Brothers Studios Gate 7/Gate 8 &	A.M.	0.732	C
	Forest Lawn Drive	P.M.	0.542	A
57.	Memorial Drive &	A.M.	0.529	A
	Forest Lawn Drive	P.M.	0.535	A
58.	Mount Sinai Drive &	A.M.	0.531	A
	Forest Lawn Drive	P.M.	0.443	A
59.	Forest Lawn Drive &	A.M.	1.141	F
	Zoo Drive	P.M.	0.816	D
60. [b]	Forest Lawn Drive &	A.M.	**	F
	SR 134 EB Ramps	P.M.	35.1	E
61. [b]	Forest Lawn Drive &	A.M.	**	F
	SR 134 WB Ramps	P.M.	**	F
62. [a]	Cahuenga Boulevard/Highland Avenue &	A.M.	0.738	C
	Pat Moore Way/US 101 On-Ramps	P.M.	0.616	B
63. [a]	Highland Avenue &	A.M.	0.861	D
	Odin Street	P.M.	0.710	C
64. [b]	Highland Avenue &	A.M.	0.744	C
	Camrose Drive	P.M.	0.697	B
65. [b,c]	Highland Avenue &	A.M.	-	F
	Franklin Avenue	P.M.	-	F
66. [a,c]	Highland Avenue &	A.M.	-	F
	Franklin Place/Franklin Avenue	P.M.		F
67. [b]	Odin Street &	A.M.	0.571	A
	Cahuenga Boulevard	P.M.	0.771	C
68. [a]	Cahuenga Boulevard &	A.M.	0.652	B
	US 101 NB Off-Ramp	P.M.	1.071	F
69. [a]	Cahuenga Boulevard &	A.M.	0.875	D
	Franklin Avenue	P.M.	1.325	F
70. [a]	Cahuenga Boulevard &	A.M.	0.325	C
	Hollywood Boulevard	P.M.	0.825	D
71. [a]	Vine Street &	A.M.	0.665	B
	Franklin Avenue/US 101 SB Off-Ramp	P.M.	0.643	A
72. [a]	[illegible]	A.M.	[illegible]	[illegible]
	[illegible]	P.M.	[illegible]	[illegible]
73. [a]	[illegible]	A.M.	14.1	B
	[illegible]	P.M.	24.1	C
74.	Pass Avenue &	A.M.	0.776	C
	Magnolia Boulevard	P.M.	0.889	D
75.	Pass Avenue &	A.M.	0.866	D
	Verdugo Lane	P.M.	1.203	F
76.	Pass Avenue &	A.M.	0.526	A
	Oak Street	P.M.	0.626	B
77. [a]	Evergreen Street/Riverside Drive &	A.M.	0.740	C
	Alameda Avenue	P.M.	0.827	D
78.	Pass Avenue &	A.M.	0.789	C
	SR 134 EB Off Ramp	P.M.	0.696	B

ATTACHMENT 8 Pg 4

Table 3.5 (Continued)

[illegible]

Intersection Peak Hour Levels of Service

No.	Intersection	Peak Hour	V/C or Delay	LOS
79. [1]	Pass Avenue &	A.M.	0.907	E
	Alameda Avenue	P.M.	1.078	F
80. [1]	Pass Avenue &	A.M.	0.818	D
	Riverside Drive	P.M.	0.641	B
81. [1]	Olive Avenue &	A.M.	0.967	E
	Pass Avenue	P.M.	0.948	E
82. [1]	Olive Avenue &	A.M.	0.607	D
	Warner Brothers Studios Gate 2/Gate 3	P.M.	0.803	D
83. [1]	Olive Avenue &	A.M.	0.652	B
	Warner Brothers Studios Gate 1/Lakeside Drive	P.M.	0.825	D
84. [1]	Hollywood Way &	A.M.	1.259	F
	Alameda Avenue	P.M.	1.264	F
85. [1]	Cordova Street/SR 134 WB Off-Ramp &	A.M.	1.040	F
	Alameda Avenue	P.M.	1.176	F
86. [1]	Hollywood Way &	A.M.	0.791	C
	Olive Avenue	P.M.	1.207	F
87. [1]	Olive Avenue &	A.M.	0.786	C
	Riverside Drive	P.M.	0.871	D
88. [1]	Lima Street &	A.M.	0.435	A
	Olive Avenue	P.M.	0.452	A
89. [1]	Olive Avenue &	A.M.	0.937	E
	Alameda Avenue	P.M.	1.100	F
90.	California Street &	A.M.	0.605	B
	Riverside Drive	P.M.	0.827	D
91. [1]	Bob Hope Drive &	A.M.	0.985	E
	Alameda Avenue	P.M.	1.013	F
92. [1]	Buena Vista Street &	A.M.	0.937	F
	Alameda Avenue	P.M.	0.946	F
93.	Buena Vista Street/SR 134 EB On-Ramp &	A.M.	1.075	F
	Riverside Drive/SR 134 WB Ramps	P.M.	1.020	F
94. [1]	SR 134 EB On-Ramp/Screenland Drive &	A.M.	13.2	B
	Riverside Drive	P.M.	33.6	D
95. [1]	Buena Vista Street &	A.M.	1.121	F
	Olive Avenue	P.M.	1.099	F
96. [4,6]	Sepulveda Boulevard &	A.M.	1.291	F
	Ventura Boulevard	P.M.	1.485	F
97. [5]	Noble Avenue &	A.M.	0.815	D
	Ventura Boulevard	P.M.	0.873	D
98. [5]	Koster Avenue &	A.M.	0.777	C
	Ventura Boulevard	P.M.	0.818	D
99. [5]	Willis Avenue &	A.M.	0.676	B
	Ventura Boulevard	P.M.	0.729	C
100. [5]	Cedros Avenue (West) &	A.M.	0.784	C
	Ventura Boulevard	P.M.	0.941	E
101. [5]	Cedros Avenue (East) &	A.M.	1.078	F
	Ventura Boulevard	P.M.	0.836	D
102. [5]	Van Nuys Boulevard &	A.M.	1.125	F
	Ventura Boulevard	P.M.	1.297	F
103. [5]	Tyrone Avenue/Beverly Glen Boulevard &	A.M.	0.864	D
	Ventura Boulevard	P.M.	1.004	F
104. [2]	Hazeltine Avenue (West) &	A.M.	0.761	C
	Ventura Boulevard	P.M.	0.871	D
105. [3]	Stern Avenue (West) &	A.M.	0.597	A
	Ventura Boulevard	P.M.	0.605	B

ATTACHMENT 8 Pg 5

Table 4B (Continued)

Intersection Peak Hour Levels of Service

No.	Intersection	Peak Hour	V/C or Delay	LOS
106. [a,b]	Woodman Avenue &	A.M.	0.818	D
	Ventura Boulevard	P.M.	0.903	E
107. [c]	Sunnyslope Avenue &	A.M.	0.697	B
	Ventura Boulevard	P.M.	0.624	B
108. [c]	Dixie Canyon Avenue &	A.M.	0.665	B
	Ventura Boulevard	P.M.	0.701	C
109. [c]	Fulton Avenue &	A.M.	0.857	D
	Ventura Boulevard	P.M.	0.869	D
110. [c]	Valley Vista Boulevard/Ethel Avenue &	A.M.	0.775	C
	Ventura Boulevard	P.M.	0.765	C
111. [c]	Coldwater Canyon Avenue &	A.M.	1.217	F
	Ventura Boulevard	P.M.	1.491	F
112. [c]	Whitsett Avenue/Laurel Terrace Drive &	A.M.	0.744	C
	Ventura Boulevard	P.M.	0.904	E
113. [c]	Laurelgrove Avenue &	A.M.	0.609	B
	Ventura Boulevard	P.M.	0.729	C
114. [c]	Vantage Avenue &	A.M.	0.662	B
	Ventura Boulevard	P.M.	0.710	C
115. [c,d]	Laurel Canyon Boulevard &	A.M.	1.152	F
	Ventura Boulevard	P.M.	1.069	F
116.	Redford Avenue/Ventura Place &	A.M.	0.649	B
	Ventura Boulevard	P.M.	0.640	B
117. [b]	US 101 SB On-Ramp n/o Lankershim Boulevard &	A.M.	0.0	A
	Ventura Boulevard	P.M.	0.0	A
118. [a]	Lankershim Boulevard/Tujunga Avenue &	A.M.	1.189	F
	Burbank Boulevard	P.M.	1.170	F
119. [a]	Vineland Avenue &	A.M.	0.843	D
	Burbank Boulevard	P.M.	0.798	C
120. [c]	Cahuenga Boulevard &	A.M.	1.169	F
	Burbank Boulevard	P.M.	1.030	F
121. [a]	Cahuenga Boulevard &	A.M.	0.471	A
	Chandler Boulevard	P.M.	0.706	C
122	La Cienega Boulevard &	A.M.	0.831	D
	Sunset Boulevard	P.M.	1.218	F
123. [g]	La Cienega Boulevard &	A.M.	1.067	F
	Santa Monica Boulevard	P.M.	0.916	E
124. [g]	Laurel Canyon Boulevard &	A.M.	0.607	B
	Hollywood Boulevard	P.M.	0.754	C
125. [c]	Crescent Heights Boulevard &	A.M.	1.243	F
	Sunset Boulevard	P.M.	0.951	E
126. [g]	Fairfax Avenue &	A.M.	0.350	C
	Hollywood Boulevard	P.M.	0.875	D
127. [g]	Fairfax Avenue &	A.M.	0.728	C
	Sunset Boulevard	P.M.	0.949	E
128. [a,b]	La Brea Avenue &	A.M.	-	F
	Franklin Avenue	P.M.	-	E
129. [a]	La Brea Avenue &	A.M.	1.026	F
	Hollywood Boulevard	P.M.	0.930	E
130. [c]	La Brea Avenue &	A.M.	0.929	E
	Sunset Boulevard	P.M.	1.091	F
131.	La Brea Avenue &	A.M.	1.076	F
	Fountain Avenue	P.M.	1.033	F
132.	La Brea Avenue &	A.M.	0.977	E
	Santa Monica Boulevard	P.M.	1.080	F

* 2 BLOCKS OUT OF STUDY CITY

ATTACHMENT 8 Pg 6

Table VII (Continued)

Intersection Peak Hour Levels of Service

No.	Intersection	Peak Hour	V/C or Delay	LOS
133. [a,c]	Highland Avenue &	A.M.	-	F
	Hollywood Boulevard	P.M.	-	F
134. [d]	Highland Avenue &	A.M.	0.930	E
	Sunset Boulevard	P.M.	0.896	D
135. [e]	Highland Avenue &	A.M.	0.991	E
	Fountain Avenue	P.M.	0.785	C
136. [c,f]	Highland Avenue &	A.M.	0.515	C
	Santa Monica Boulevard	P.M.	0.936	E
137. [g]	Kester Avenue (East) &	A.M.	0.697	B
	Ventura Boulevard	P.M.	0.998	E
138.	San Vicente Boulevard/Clark St &	A.M.	0.959	E
	Sunset Boulevard	P.M.	1.117	F
139. [d]	Cahuenga Boulevard &	A.M.	0.907	E
	Sunset Boulevard	P.M.	0.814	D
140. [g]	Lankershim Boulevard &	A.M.	0.594	A
	Chandler Boulevard (North)	P.M.	0.353	A
141. [h]	SR 170 SB Ramps &	A.M.	0.776	C
	Magnolia Boulevard	P.M.	0.605	B
142. [a]	SR 170 NB Ramps &	A.M.	0.551	A
	Magnolia Boulevard	P.M.	0.712	C
143. [b]	Tujunga Avenue &	A.M.	16.5	C
	SR 170 NB On-Ramp/Private Driveway	P.M.	12.5	B
144. [g]	Coldwater Canyon Avenue &	A.M.	0.566	A
	US 101 NB Ramps	P.M.	0.551	A
145. [a]	Coldwater Canyon Avenue &	A.M.	0.632	B
	US 101 SB Ramps	P.M.	0.605	B
146. [a]	Coldwater Canyon Avenue &	A.M.	0.953	E
	Moorpark Street	P.M.	1.103	F
147. [a]	Laurel Canyon Boulevard &	A.M.	0.765	C
	US 101 NB Ramps	P.M.	0.832	D
148. [a]	Laurel Canyon Boulevard &	A.M.	0.795	C
	US 101 SB Ramps	P.M.	0.846	D
149. [a]	Laurel Canyon Boulevard &	A.M.	1.111	F
	Moorpark Street	P.M.	1.287	F
150. [a]	Colfax Avenue &	A.M.	1.000	E
	Riverside Drive	P.M.	1.005	F
151. [a]	Colfax Avenue &	A.M.	0.864	D
	Moorpark Street	P.M.	0.654	B
152. [a]	Lankershim Boulevard &	A.M.	0.758	C
	Chandler Boulevard (South)	P.M.	0.609	B
153. [i]	Hollywood Way &	A.M.	1.205	F
	Verdugo Avenue	P.M.	1.102	F
154. [i]	Hollywood Way &	A.M.	1.277	F
	Magnolia Boulevard	P.M.	1.053	F
155. [i]	Buena Vista Street &	A.M.	1.012	F
	Verdugo Avenue	P.M.	1.176	F
156. [i]	Buena Vista Street &	A.M.	1.068	F
	Magnolia Boulevard	P.M.	1.147	F
157. [k]	Tujunga Avenue &	A.M.	16.0	C
	US 101 SB Off-Ramp	P.M.	53.2	F
158.	Tujunga Avenue &	A.M.	12.2	B
	US 101 NB On-Ramp	P.M.	10.6	B
159. [c]	US 101 SB Off-Ramp &	A.M.	25.3	D
	Riverside Drive	P.M.	14.6	B

#15) PM PEAK TRAFFIC GOES FROM A CURRENT "C" TO AN "F" WITHOUT THE CONSTRUCTION PROJECT.

ATTACHMENT 8 AG 7

Table VII (Continued)

Future Without Project Conditions (Year 2030)

Intersection Peak Hour Levels of Service

No.	Intersection	Peak Hour	V/C or Delay	LOS
160. [a]	Vineland Avenue &	A.M.	0.724	C
	US 101 SB Ramps	P.M.	0.664	B
161. [g]	US 101 NB On-Ramp &	A.M.	11.0	B
	Moorpark Street	P.M.	18.0	C
162. [c]	Cahuenga Boulevard &	A.M.	**	F
	US 101 SB Ramps	P.M.	**	F
163. [c]	Bob Hope Drive &	A.M.	**	F
	SR 134 EB Off-Ramp	P.M.	**	F
164. [a]	SR 134 WB On Ramp &	A.M.	41.2	E
	Alameda Avenue	P.M.	49.5	E

Note: "Indicates oversaturated conditions i.e. long waits at the approaches controlled by stop signs. Delay cannot be calculated.

[a] Intersection is operating under the LADOT Adaptive Traffic Control System (ATCS). A credit of 0.10 in V/C ratio was included in the analysis.

[b] Intersection is uncontrolled. Analysis was done using 2000 Highway Capacity Manual Two-way Stop-Controlled methodology. For the purpose of evaluating the operating conditions of the intersection, level of service is based on average vehicular delay in seconds for the most constrained approach rather than V/C ratio.

[c] Intersection is controlled by stop signs on minor approach. Analysis was done using 2000 Highway Capacity Manual Two Way Stop-Controlled methodology. For the purpose of evaluating the operating conditions of the intersection, level of service is based on average vehicular delay in seconds for the most constrained approach rather than V/C ratio

[d] Denotes CMP arterial monitoring station.

[e] Traffic counts at this location were not fully representative of the situation due to downstream constraints and pedestrian conflicts. LOS is based on field observations and has not been calculated based on the Universal City Transportation Model.

Source: Gibson Transportation Consulting, Inc., March 2010.

Future Without Project Conditions (Year 2030)

Intersection Peak Hour Levels of Service Summary

	Intersections	
Level of Service	A.M. Peak Hour	P.M. Peak Hour
A	16	16
B	26	26
C	26	19
D	18	22
E	25	19
F	54	62
Total	164	164

Response to Comment No. 12-394

Attachment 8 consists of a copy of Table 28 from pages 772–778 of the Draft EIR, with notations added by the commenter regarding the intersections listed on the table, and is referenced in Comment Nos. 12-239 and 12-240. The commenter is referred to Response to Comment Nos. 12-239 and 12-240, above.

Comment No. 12-395

See next page

Table 3.1-9
Future Without Project Conditions (Year 2030)
Freeway Segment Peak Hour Levels of Service

No.	Freeway Segment	Direction	Number of Lanes[a]	Capacity	A.M. Peak Hour Volume	A.M. Peak Hour V/C	A.M. Peak Hour LOS	P.M. Peak Hour Volume	P.M. Peak Hour V/C	P.M. Peak Hour LOS
1.	US-101 south of Alvarado Street	NB	4	8,000	9,668	1.21	F(0)	12,301	1.54	F(3)
		SB	4	8,000	13,000	1.63	F(3)	12,047	1.54	F(3)
2.	US-101 south of Vermont Avenue	NB	4	8,000	9,526	1.19	F(0)	12,453	1.56	F(3)
		SB	4	8,000	12,712	1.59	F(3)	11,360	1.44	F(2)
3.[b]	US-101 south of Santa Monica Boulevard	NB	4	8,000	9,552	1.01	F(0)	12,916	1.63	F(3)
		SB	4	8,000	12,171	1.52	F(3)	11,378	1.48	F(2)
4.	US-101 south of Barham Boulevard	NB	8	10,000	9,785	0.98	E	12,204	1.22	F(0)
		SB	8	10,000	13,385	1.34	F(1)	11,560	1.17	F(0)
5.	US-101 north of Cahuenga Way	NB	6	10,000	9,732	0.98	E	11,749	1.17	F(0)
		SB	6	10,000	11,316	1.12	F(0)	9,036	0.91	E
6.[b]	US-101 east of Colcovista Canyon Avenue	NB	6	10,000	9,382	0.93	E	12,965	1.30	F(0)
		SB	6	10,000	10,678	1.07	F(0)	9,836	0.98	E
7.	US-101 east of I-405	NB	5.5	10,000	10,078	0.78	D	12,560	0.98	E
		SB	6	12,000	11,675	0.97	E	10,705	0.89	D
8.[b]	SR-134 @ Forman Avenue	EB	4.5	9,000	12,899	1.43	F(2)	8,302	0.92	D
		WB	4.5	9,000	8,362	0.93	D	11,440	1.27	F(1)
9.	SR-134 east of Forest Lawn Drive	EB	4.5	9,000	12,705	1.41	F(2)	8,675	0.96	E
		WB	4.5	9,000	11,110	1.23	F(0)	10,930	1.21	F(0)
10.	SR-170 north of Magnolia Boulevard	NB	4.5	9,000	7,218	0.80	D	11,267	1.25	F(1)
		SB	4.5	9,000	11,560	1.28	F(1)	7,092	0.79	D
11.	SR-170 south of Sherman Way	NB	4.5	9,000	5,199	0.58	C	9,431	1.05	F(0)
		SB	4.5	9,000	10,728	1.19	F(0)	6,753	0.75	C
12.	I-5 @ Colorado Boulevard Extension	NB	5.5	11,000	10,077	0.92	D	15,157	1.38	F(2)
		SB	5.5	11,000	11,542	1.05	F(0)	10,730	0.98	E
13.	I-5 south of Burbank Boulevard	NB	4	8,000	5,197	1.03	F(0)	11,021	1.38	F(2)
		SB	4	8,000	10,687	1.36	F(2)	9,920	1.12	F(0)
14.	I-405 south of Mulholland Drive	NB	5.5	11,000	9,646	0.90	D	16,897	1.62	F(3)
		SB	5.5	11,000	13,698	1.24	F(0)	9,545	0.87	D
15.	I-405 south of US-101	NB	6	10,000	9,657	0.97	E	15,834	1.63	F(3)
		SB	5.5	11,000	13,336	1.21	F(0)	9,438	0.83	D
16.	I-405 north of US-101	NB	4.5	9,000	7,403	0.82	D	12,563	1.41	F(2)
		SB	4.5	9,000	10,339	1.15	F(0)	8,375	0.93	E

[a] The lane capacities are assumed to be 2,000 vph for through lanes and 1,800 vph for high-occupancy vehicle (HOV) and auxiliary lanes. HOV and auxiliary lanes are thus represented as 1/2 of a lane.
[b] CMP Freeway Monitoring Location.

Source: Gibson Transportation Consulting, Inc., March 2010.

TABLE 22: F(0) FORCED TRAFFIC FLOW - SPEED & FLOW MAY BE GREATLY REDUCED W/ HIGH DENSITIES

F(1) FORCED TRAFFIC FLOW - SEVERE CONGESTED CONDITIONS PREVAIL FOR MORE THAN ONE HOUR. SPEED & FLOW MAY DROP TO 0 W/ HIGH DENSITIES

ATTACHMENT 9

Response to Comment No. 12-395

Attachment 9 consists of a copy of Table 29 on page 779 of the Draft EIR, with notations added by the commenter regarding traffic flow, and is referenced and responded to in Comment No. 12-241. The commenter is referred to Response to Comment No. 12-241, above.

Comment No. 12-396

See next page

Table 31
Project Site Trip Generation – Before TDM Trip Reduction

TRIP GENERATION RATES [1]								
			A.M. Peak Hour			P.M. Peak Hour		
Land Use	Rate	Daily	In	Out	Total	In	Out	Total
Apartment, ITE 220 HOW MANY ?	per Dwelling Unit [3]	6.72	20%	80%	0.51	65%	35%	0.62
Condominium, ITE 230 HOW MANY ?	per DU	5.86	17%	83%	0.44	67%	33%	0.52
Hotel, ITE 310 450 ROOMS PLANNED	per Occupied Room	8.92	58%	42%	0.67	49%	51%	0.79
Business Office, ITE 710	per 1,000 sf	7 [4]	88%	12%	[5]	17%	83%	[5]
Shopping Center, ITE 820	per 1,000 sf	42.94	61%	39%	1.03	48%	52%	3.75

TRIP GENERATION ESTIMATES									
				A.M. Peak Hour			P.M. Peak Hour		
Scenario	Size		Daily	In	Out	Total	In	Out	Total
Existing plus Interim Development [6]									
Business Area	1,286,112	sf	9,735	954	210	1,164	283	899	1,182
Studio Area	1,239,456	sf	7,535	423	199	627	286	515	781
Entertainment Area	1,513,644	sf	26,536	948	155	1,103	956	1,678	2,634
Back Lot - Studio/Production Support	136,759	sf	1,077	103	18	121	25	92	117
SUBTOTAL - Existing plus Interim Development	4,175,971	sf	44,883	2,433	582	3,015	1,530	3,184	4,714
Net Project (New plus Demolition)									
Business Area	605,662	sf	6,695	719	154	873	194	630	824
Studio Area	280,680	sf	2,908	183	124	307	101	384	485
Entertainment Area	288,600	sf	6,183	360	145	505	(102)	520	418
	500	hotel rooms							
Mixed-Use Residential Area PLANNED UNITS	[illegible]	DU	[illegible]	278	1,106	1,384	1,203	693	1,896
DOES THIS INCLUDE LOFTS & CONDOS FROM?	160,000	sf							
SUBTOTAL - Net Project			36,451	1,538	1,531	3,069	1,396	2,227	3,623

ATTACHMENT 10

Table 30 (Continued)
Project Site Trip Generation

TRIP GENERATION ESTIMATES									
				A.M. Peak Hour			P.M. Peak Hour		
Scenario	Size		Daily	In	Out	Total	In	Out	Total
Full Site									
Business Area	2,091,774	sf	18,630	1,673	364	2,037	477	1,529	2,006
Studio Area	1,656,805	sf	11,520	714	341	1,055	392	991	1,383
Entertainment Area	1,802,244	sf	32,719	1,398	300	1,698	884	2,198	3,082
	500	Hotel rooms							
Mixed-Use Residential Area	2,937	DU	20,485	278	1,106	1,384	1,203	693	1,896
	180,000	sf							
TOTAL - FULL SITE	5,730,923	sf	81,354	3,971	2,113	6,084	3,826	5,411	9,367
	500	hotel rooms							
	2,937	DU							

TOTAL IS UNRELIABLE NUMBER BASED ON QUESTIONS ON 1ST PAGE OF TABLE 30

[a] Trip generation rates for land uses other than those mentioned above were derived from empirical data collected at the Project Site.
[b] Dwelling Unit - DU
[c] Trip generation rate based on the best-fit curve formula listed in the ITE for the identified land use
Daily - Ln (T) = 0.77 Ln(X) + 3.65 T = Average Vehicle Trips X = Gross Leasable Area (tsf)
A.M. Peak Hour -
Ln(T) = 0.80 Ln(X) – 1.65
P.M. Peak Hour -
T = 1.12 X + 78.81
[d] Portion of the studio damaged in the June 1, 2008 fire is included in the Existing plus Interim Development baseline and will be replaced with substantially similar uses and square footages.

Source: Gibson Transportation Consulting, Inc., March 2010.

ATTACHMENT 10 Pg 2

Response to Comment No. 12-396

Attachment 10 consists of a copy of Table 30 from pages 780–781 of the Draft EIR, with notations added by the commenter regarding the trip generation rates, and is referenced and responded to in Comment No. 12-242. The commenter is referred to Response to Comment No. 12-242, above.

Comment No. 12-397

See next page

Table 33
Access Impact Analysis - Operational

No.		Intersection	Peak Hour	Existing		Future without Project		Future with Project, Before TDM Trip Reduction and Mitigations			Future with Project with TDM, Before Mitigations			Future with Project with Funded Improvements		
				V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	Significant Impact?	V/C or Delay	LOS	Residual Impact?	V/C or Delay	LOS	Residual Impact?
34.	[a]	Lankershim Boulevard & Valleyheart Drive/James Stewart Avenue	A.M.	0.329	A	0.715	C	0.781	C	NO	0.762	C	NO	0.604	B	NO
			P.M.	0.356	A	0.904	E	1.023	F	YES	0.981	E	YES	0.789	C	NO
35.	[a]	Lankershim Boulevard & Main Street	A.M.	0.431	A	0.880	D	0.952	E	YES	0.932	E	YES	0.763	C	NO
			P.M.	0.390	A	0.760	C	1.057	F	YES	0.952	E	YES	0.729	C	NO
[illegible]	[illegible]	[illegible] Hollywood Drive	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
42.	[a]	Universal Center Drive/Universal Studios Boulevard & Buddy Holly Drive	A.M.	0.065	A	0.397	A	0.557	A	NO	0.514	A	NO	0.413	A	NO
			P.M.	0.159	A	0.892	D	0.995	E	YES	0.956	E	YES	0.820	D	NO
[illegible]	[illegible]	[illegible] [illegible] Peace Drive/Forest [illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
72.	[b], [c]	Lankershim Boulevard & Muddy Waters Drive	A.M.	18.1	C	--	F	--	F	YES	--	F	YES	0.508	A	NO
			P.M.	19.2	C	--	F	--	F	YES	--	F	YES	0.854	D	NO
73.	[b]	Lankershim Boulevard & Jimi Hendrix Drive	A.M.	11.7	B	14.1	B	16.4	C	NO	15.6	C	NO	16.5	C	NO
			P.M.	13.4	B	24.1	C	36.9	E	YES	30.7	D	NO	33.0	D	NO
155.	[d]	Barham Boulevard & C Street	A.M.	-	N/A	-	N/A	0.925	E	YES	0.911	E	YES	0.634	B	NO
			P.M.	-	N/A	-	N/A	0.987	E	YES	0.960	E	YES	0.711	C	NO
156.	[d]	North-South Road/US 101 Northbound On-ramp & Buddy Holly Drive	A.M.	-	N/A	-	N/A	0.323	A	NO	0.287	A	NO	0.303	A	NO
			P.M.	-	N/A	-	N/A	0.744	A	NO	0.664	A	NO	0.605	B	NO
157.	[d]	Universal Studios Boulevard & US 101 Southbound On-ramp	A.M.	-	N/A	-	N/A	-	N/A	-	-	N/A	-	0.147	A	NO
			P.M.	-	N/A	-	N/A	-	N/A	-	-	N/A	-	0.291	A	NO

[a] Intersection is operating under the LADOT Adaptive Traffic Control System (ATCS). A credit of 0.10 in V/C ratio was included in the analysis.
[b] Intersection is controlled by stop signs on minor approach. For the purpose of evaluating the operating conditions of the intersection, level of service is based on average vehicular delay in seconds for the most constrained approach rather than V/C ratio.
[c] Intersection is signalized as part of Project mitigation.
[d] Intersection is constructed as part of the Project.

ATTACHMENT 11

#36 * THIS INTERSECTION GOES FROM AN "A" IN AM & PM TO AN "F" IN AM & PM WITH TDM & FUNDED IMPROVEMENTS—

#53 * THIS INTERSECTION IS ALREADY FAILING AND GETS WORSE W/ TDM & IMPROVEMENTS & DOES SERVE SOME OF THE RESIDENTIAL STREETS

Response to Comment No. 12-397

Attachment 11 consists of a copy of Table 38 on page 801 of the Draft EIR, with notations added by the commenter regarding the intersections listed on the table, and is referenced in Comment No. 12-243. The commenter is referred to Response to Comment No. 12-243, above.

Comment No. 12-398

See next page

PROJECT DEVELOPER MUST BE RESPONSIBLE FOR ALL MITIGATION WITHOUT COUNTING ON SHARED MITIGATION FROM METRO PROJECT OR ANY OTHER POTENTIAL PROJECT.

Table [illegible]
Peak Hour Project With Funded Improvements Conditions (Year 2030)
Intersection Peak Hour Level of Service - Signalized Intersections

No.		Intersection	Peak Hour	Future without Project		Future with Project with TDM, Before Mitigations				Future with Project with Funded Improvements								
				V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?	V/C	LOS	Required Evolution Plan Mitigation V/C	Mitigation V/C Effectiveness	Required Metro Universal Mitigation V/C	[illegible]	Leftover Mitigation V/C after Metro Universal Required Credit	Required V/C Improvement to eliminate Evolution Plan Significant Impact	Residual Significant Impact?
	[illegible]	[illegible]	A.M.	[illegible]		[illegible]				[illegible]								
		[illegible]				0.659	F	0.027	YES	[illegible]								NO
		[illegible]	P.M.	[illegible]		[illegible]				[illegible]								
		[illegible]												0.017				NO
2.	[a]	Kraft Avenue/SR 170 SB Off-Ramp & Riverside Drive	A.M.	0.668	B	0.695	B	0.033	NO	0.643	B	0.000	0.053	0.000	NO	0.053		NO
			P.M.	0.618	B	0.621	B	0.003	NO	0.593	A	0.000	0.028	0.000	NO	0.028		NO
3.	[a]	Tujunga Avenue & Riverside Drive/Camarillo Street	A.M.	1.171	F	1.196	F	0.025	YES	1.155	F	0.016	0.041	0.017		0.024		NO
			P.M.	1.126	F	1.130	F	0.004	NO	1.120	F	0.000	0.010	0.000		0.010		NO
		[illegible]					C	[illegible]		[illegible]								
		Ventura Boulevard	P.M.	[illegible]						[illegible]		0.001		0.000	NC	0.037		NO
		[illegible]								[illegible]								NO
		[illegible]	P.M.	[illegible]						[illegible]	B	0.000	[illegible]	0.000	NC	0.037		NO
6.	[a]	Lankershim Boulevard & Magnolia Boulevard	A.M.	1.197	F	1.206	F	0.009	NO	1.196	F	0.000	0.010	0.000	NC	0.010		NO
			P.M.	1.107	F	1.116	F	0.009	NO	1.105	F	0.000	0.010	0.000	NC	0.010		NO
		[illegible]								[illegible]	B	[illegible]		0.000	NC	[illegible]		NO
		[illegible]	P.M.	[illegible]						[illegible]	F	[illegible]	[illegible]	[illegible]	NC	[illegible]		NO
8.	[a]	Vineland Avenue & Magnolia Boulevard	A.M.	1.101	F	1.104	F	0.003	NO	1.094	F	0.000	0.010	0.000	NC	0.010		NO
			P.M.	1.402	F	1.406	F	0.004	NO	1.395	F	0.000	0.010	0.000	NC	0.010		NO
9.	[a]	Vineland Avenue/Lankershim Boulevard & Camarillo Street	A.M.	1.351	F	1.376	F	0.025	YES	1.325	F	0.016	0.051	0.021		0.030		NO
			P.M.	1.205	F	1.221	F	0.016	YES	1.208	F	0.007	0.012	0.000		0.012		NO
10.	[a]	Vineland Avenue & Riverside Drive	A.M.	1.124	F	1.172	F	0.048	YES	1.066	F	0.040	0.107	0.028		0.079		NO
			P.M.	0.820	D	0.953	D	0.003	YES	0.801	D	0.014	0.052	0.000		0.052		NO
11.		[illegible]		[illegible]						[illegible]	E	[illegible]		[illegible]		[illegible]		
		[illegible]							YES	[illegible]	F	[illegible]	[illegible]	[illegible]		[illegible]		NO
12.	[a]	Vineland Avenue & Whipple Street	A.M.	0.500	A	0.504	A	0.004	NO	0.494	A	0.000	0.010	0.000	NC	0.010		NO
			P.M.	0.446	A	0.448	A	0.002	NO	0.436	A	0.000	0.010	0.000	NC	0.010		NO
13.	[a]	Vineland Avenue & US 101 NB Off-Ramp	A.M.	0.484	A	0.496	A	0.012	NO	0.481	A	0.000	0.015	0.000	NO	0.015		NO
			P.M.	0.405	A	0.409	A	0.004	NO	0.399	A	0.000	0.010	0.000	NO	0.010		NO
		[illegible]		[illegible]				[illegible]	YES	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]		[illegible]		[illegible]
		[illegible]	P.M.	[illegible]				[illegible]	[illegible]	0.496	E	0.000	0.100	0.040		[illegible]		NO
15.	[a]	Plaza Parkway & Ventura Boulevard	A.M.	0.804	D	0.844	D	0.040	YES	0.711	C	0.021	0.133	0.010		0.123		NO
			P.M.	0.539	A	0.569	A	0.030	NO	0.533	A	0.000	0.036	0.000		0.036		NO

* 2 BLOCKS OUT SIDE OF STUDIO CITY

ATTACHMENT 12

Table 3S (Continued)
Future With Project With Funded Improvements Conditions (Year 2030)
Intersection Peak Hour Levels of Service - Signalized Intersections

No.		Intersection	Peak Hour	Future without Project		Future with Project with TDM, Before Mitigations				Future with Project with Funded Improvements								
				V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?	V/C	LOS	Required Evolution Plan Mitigation V/C	Mitigation V/C Effectiveness	Required Metro Universal Mitigation V/C	Mitigation Shared with Metro Universal	Leftover Mitigation V/C after Metro Universal Required Credit	Required V/C Improvement to eliminate Evolution Plan Significant Impact	Residual Significant Impact?
17.	[a]	Riverton Avenue/Campo de Cahuenga Way & Ventura Boulevard	A.M.	0.642	B	0.653	B	0.013	NO	0.597	B	0.000	-0.044	0.000	NO	-0.044		NO
			P.M.	0.516	B	0.551	B	0.035	NO	0.557	B	0.000	-0.006	0.000	NO	-0.003		NO
18.	[a]	Lankershim Boulevard & SR 134 WB Off-Ramp	A.M.	0.985	E	0.953	E	0.028	YES	0.914	E	0.019	0.049	0.021		0.028		NO
			P.M.	0.597	A	0.617	B	0.020	NO	0.607	B	0.000	0.010	0.000		0.010		NO
19.	[a]	Lankershim Boulevard & Riverside Drive	A.M.	1.259	F	1.329	F	0.070	YES	1.184	F	0.061	0.145	0.069	YES	0.076		NO
			P.M.	1.060	F	1.110	F	0.050	YES	1.018	F	0.041	0.091	0.013	YES	0.078		NO
20.	[a]	Lankershim Boulevard & Moorpark Street	A.M.	1.368	F	1.454	F	0.086	YES	1.129	F	0.077	0.325	0.075	YES	0.250		NO
			P.M.	1.178	F	1.215	F	0.037	YES	1.120	F	0.028	0.095	0.017	YES	0.078		NO
21.	[a]	Lankershim Boulevard & Whipple Street	A.M.	0.951	E	1.025	F	0.074	YES	0.880	D	0.065	0.145	0.065	NO	0.080		NO
			P.M.	0.489	A	0.522	A	0.033	NO	0.512	A	0.000	0.010	0.000	NO	0.010		NO
									NO									NO
									YES									YES
23.			P.M.	0.292					NO									NO
		Cahuenga Way							YES									YES
24.	[a]	Cahuenga Boulevard & Magnolia Boulevard	A.M.	1.828	F	1.843	F	0.015	YES	1.808	F	0.006	0.035	0.016	NO	0.019		NO
			P.M.	1.403	F	1.406	F	0.003	NO	1.323	F	0.000	0.083	0.000	NO	0.083		NO
25.	[a]	Cahuenga Boulevard & Huston Street	A.M.	0.948	E	0.954	E	0.014	YES	0.921	E	0.005	0.033	0.000	NO	0.033		NO
			P.M.	0.549	A	0.553	A	0.004	NO	0.477	A	0.000	0.076	0.000	NO	0.076		NO
26.	[a]	Cahuenga Boulevard & Camarillo Street	A.M.	1.488	F	1.505	F	0.017	YES	1.472	F	0.008	0.034	0.017	YES	0.017		NO
			P.M.	1.278	F	1.282	F	0.004	NO	1.225	F	0.000	0.047	0.000		0.047		NO
27.	[a]	Cahuenga Boulevard & SR 134 WB Off-Ramp	A.M.	0.702	C	0.780	C	0.078	YES	0.741	C	0.000	0.039	0.000	NO	0.039		NO
			P.M.	0.565	A	0.583	A	0.018	NO	0.521	A	0.000	0.047	0.000	NO	0.047		NO
28.	[a]	Cahuenga Boulevard & SR 134 EB Ramps	A.M.	0.924	E	0.946	E	0.022	YES	0.818	B	0.013	0.328	0.010	YES	0.318		NO
			P.M.	0.968	E	1.036	F	0.067	YES	0.768	C	0.058	0.267	0.088	YES	0.179		NO
29.	[a]	Cahuenga Boulevard & Riverside Drive	A.M.	1.158	F	1.211	F	0.053	YES	1.113	F	0.044	0.092	0.065	YES	0.027	0.017	YES
			P.M.	1.291	F	1.365	F	0.074	YES	1.257	F	0.065	0.108	0.067	YES	0.041	0.024	YES
30.	[a]	Cahuenga Boulevard & Moorpark Street	A.M.	1.047	F	1.123	F	0.076	YES	1.038	F	0.067	0.084	0.139	YES	0.000	0.067	YES
			P.M.	1.117	F	1.185	F	0.068	YES	1.175	F	0.059	0.010	0.138	YES	0.000	0.059	YES
31.	[a]	Cahuenga Boulevard & Whipple Street	A.M.	0.658	B	0.717	C	0.059	YES	0.625	B	0.017	0.092	0.000	NO	0.092		NO
			P.M.	0.692	B	0.760	C	0.068	YES	0.727	C	0.029	0.033	0.000	NO	0.033		NO

ATTACHMENT 12 Pg 2

Table 38 (Continued)
Future With Project With Funded Improvements Conditions (Year 2030)
Intersection Peak Hour Levels of Service - Signalized Intersections

No.		Intersection	Peak Hour	Future without Project		Future with Project with TDM, Before Mitigations				Future with Project with Funded Improvements								
				V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?	V/C	LOS	Required Evolution Plan Mitigation V/C	Mitigation V/C Effectiveness	Required Metro Universal Mitigation V/C	Mitigation Shared with Metro Universal	Leftover Mitigation V/C after Metro Universal Required Credit	Required V/C Improvement to eliminate Evolution Plan Significant Impact	Residual Significant Impact?
33.	[a]	Lankershim Boulevard & Cahuenga Boulevard	A.M.	0.837	D	0.925	E	0.088	YES	0.771	C	0.069	0.154	0.090		0.064	0.005	YES
			P.M.	0.636	B	0.684	B	0.048	NO	0.553	A	0.000	0.131	0.000		0.131		NO
			A.M.						YES									NO
			P.M.						YES									
			A.M.								D	0.033		0.110				
						1.502	E	0.114	YES					0.114			0.044	YES
36.	[a]			1.034					YES		F	0.196	0.055	0.020		1.025	0.161	YES
						1.517		0.172	YES	.168	F							NO
			A.M.		E		F		YES	0.782	D			0.060				NO
			P.M.						YES	0.667	E		0.520					NO
			A.M.		E		E		YES	0.902					YES			NO
			P.M.						YES	0.869	D	0.083	0.144	0.041		0.138		
39.	[a]	US 101 SB Ramps/Regal Place & Cahuenga Boulevard	A.M.	0.843	D	0.897	D	0.051	YES	0.844	D	0.032	0.053	0.000	NO	0.053		NO
			P.M.	0.810	D	0.904	E	0.094	YES	0.794	C	0.075	0.170	0.000	NO	0.170		NO
40.	[a]	Ledge Avenue/Moorpark Way & Riverside Drive	A.M.	1.070	F	1.122	F	0.052	YES	0.945	E	0.043	0.177	0.093	YES	0.084		NO
			P.M.	1.067	F	1.140	F	0.073	YES	0.975	E	0.064	0.164	0.094		0.070		NO
41.	[a]	Forman Avenue & Riverside Drive	A.M.	0.798	C	0.823	D	0.025	YES	0.806	D	0.006	0.017	0.000		0.017		NO
			P.M.	0.801	E	0.855	E	0.054	YES	0.879	D	0.045	0.082	0.022		0.060		NO
42.	[a]	Broadlawn Drive & Cahuenga Boulevard	A.M.	0.651	B	0.705	C	0.044	YES	0.679	B	0.005	0.026	0.000	NO	0.026		NO
			P.M.	0.447	A	0.513	A	0.066	NO	0.486	A	0.000	0.027	0.000	NO	0.027		NO
43.	[a]	Universal Center Drive/Universal Studios Boulevard & Buddy Holly Drive	A.M.	0.397	A	0.514	A	0.117	NO	0.418	A	0.000	0.096	0.000	NO	0.096		NO
			P.M.	0.882	D	0.968	E	0.054	YES	0.826	D	0.055	0.130	0.000	NO	0.130		NO
44.	[a]	Universal Studios Boulevard & Cahuenga Boulevard	A.M.	0.568	B	0.796	C	0.128	YES	0.581	A	0.089	0.215	0.000	NO	0.215		NO
			P.M.	0.724	C	0.897	D	0.173	YES	0.747	C	0.134	0.150	0.000	NO	0.150		NO
45.	[a]	Oakshire Drive & Cahuenga Boulevard	A.M.	0.713	C	0.831	D	0.118	YES	0.640	B	0.074	0.191	0.000	NO	0.191		NO
			P.M.	0.776	C	0.880	D	0.104	YES	0.638	B	0.080	0.242	0.000	NO	0.242		NO
46.	[a]	US 101 SB Ramps w/o Barham Boulevard & Cahuenga Boulevard	A.M.	1.225	F	1.345	F	0.120	YES	1.131	F	0.111	0.214	0.000	NO	0.214		NO
			P.M.	1.368	F	1.512	F	0.144	YES	1.265	F	0.135	0.246	0.000	NO	0.246		NO

ATTACHMENT 12, Pg 3

Table 3S (Continued)
Future With Project With Funded Improvements Conditions (Year 2030)
Intersection Peak Hour Levels of Service - Signalized Intersections

No.		Intersection	Peak Hour	Future without Project		Future with Project with TDM, Before Mitigations				Future with Project with Funded Improvements								
				V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?	V/C	LOS	Required Evolution Plan Mitigation V/C	Mitigation V/C Effectiveness	Required Metro Universal Mitigation V/C	Mitigation Shared with Metro Universal	Leftover Mitigation V/C after Metro Universal Required Credit	Required V/C Improvement to eliminate Evolution Plan Significant Impact	Residual Significant Impact?
47.	[a]	Barham Boulevard & Cahuenga Boulevard	A.M.	1.072	F	1.121	F	0.049	YES	1.070	F	0.040	0.051	0.000		0.051		NO
			P.M.	1.356	F	1.381	F	0.025	YES	1.312	F	0.016	0.069	0.007	YES	0.062		NO
48.	[a]	Barham Boulevard & Buddy Holly Drive/Cahuenga Boulevard	A.M.	1.109	F	1.115	F	0.006	NO	1.101	F	0.000	0.014	0.000	NO	0.014		NO
			P.M.	1.325	F	1.418	F	0.093	YES	1.084	F	0.084	0.332	0.000	NO	0.332		NO
49.	[a]	Cahuenga Boulevard & Oakcrest Drive	A.M.	0.978	E	1.035	F	0.062	YES	0.959	E	0.053	0.076	0.000	NO	0.076		NO
			P.M.	0.723	C	0.758	C	0.035	NO	0.694	B	0.000	0.065	0.000	NO	0.065		NO
50.	[a]	Cahuenga Boulevard & Mulholland Drive	A.M.	1.051	F	1.480	F	0.429	YES	1.042	F	0.420	0.438	0.000	NO	0.438		NO
			P.M.	1.091	F	1.141	F	0.050	YES	1.046	F	0.041	0.065	0.000	NO	0.065		NO
51.	[a]	Cahuenga Boulevard & Hillcrest Drive	A.M.	0.889	D	0.933	E	0.044	YES	0.849	D	0.035	0.073	0.000	NO	0.073		NO
			P.M.	0.725	C	0.751	C	0.026	NO	0.689	B	0.000	0.062	0.000	NO	0.062		NO
52.	[a]	Barham Boulevard & De Wit Drive	A.M.	1.028	F	1.036	F	0.008	NO	1.020	F	0.000	0.013	0.000	NO	0.013		NO
			P.M.	1.005	F	1.010	F	0.005	NO	0.922	E	0.000	0.088	0.000	NO	0.088		NO
53.	[a]	Barham Boulevard & Lake Hollywood Drive	A.M.	1.158	F	1.174	F	0.005	NO	1.151	F	0.000	0.013	0.000	NO	0.013		NO
			P.M.	1.093	F	1.117	F	0.024	YES	1.101	F	0.015	0.016	0.000	NO	0.016		NO
54.	[a]	Barham Boulevard & Coyote Canyon Road	A.M.	1.049	F	1.055	F	0.006	NO	1.042	F	0.000	0.013	0.000	NO	0.013		NO
			P.M.	0.927	E	0.929	E	0.002	NO	0.902	E	0.000	0.027	0.000	NO	0.027		NO
55.	[a]	Barham Boulevard & Lakeside Plaza Drive/Forest Lawn Drive	A.M.	1.352	F	1.477	F	0.125	YES	1.241	F	0.116	0.236	0.000	NO	0.236		NO
			P.M.	1.204	F	1.287	F	0.083	YES	1.130	F	0.074	0.157	0.000	NO	0.157		NO
56.	[a]	Warner Brothers Studios Gate 7/Gate 8 & Forest Lawn Drive	A.M.	0.732	C	0.744	C	0.012	NO	0.726	C	0.000	0.006	0.000	NO	0.006		NO
			P.M.	0.542	A	0.582	A	0.040	NO	0.550	A	0.000	0.022	0.000	NO	0.022		NO
57.	[a]	Memorial Drive & Forest Lawn Drive	A.M.	0.529	A	0.541	A	0.012	NO	0.526	A	0.000	0.005	0.000	NO	0.005		NO
			P.M.	0.535	A	0.576	A	0.041	NO	0.557	A	0.000	0.019	0.000	NO	0.019		NO
58.	[a]	Mount Sinai Drive & Forest Lawn Drive	A.M.	0.531	A	0.542	A	0.011	NO	0.536	A	0.000	0.004	0.000	NO	0.004		NO
			P.M.	0.443	A	0.483	A	0.040	NO	0.464	A	0.000	0.019	0.000	NO	0.019		NO
59.	[a]	Forest Lawn Drive & Zoo Drive	A.M.	1.141	F	1.162	F	0.021	YES	0.555	A	0.012	0.607	0.000	NO	0.607		NO
			P.M.	0.816	D	0.877	D	0.061	YES	0.710	C	0.042	0.167	0.000	NO	0.157		NO
62.	[a]	Cahuenga Boulevard/Highland Avenue & Pat Moore Way/US 101 On-Ramps	A.M.	0.738	C	0.767	C	0.029	NO	0.726	C	0.000	0.041	0.000	NO	0.041		NO
			P.M.	0.616	B	0.643	B	0.027	NO	0.602	B	0.000	0.041	0.000	NO	0.041		NO
63.	[a]	Highland Avenue & Odin Street	A.M.	0.851	D	0.891	D	0.039	YES	0.849	D	0.011	0.042	0.000	NO	0.042		NO
			P.M.	0.719	C	0.733	C	0.023	NO	0.691	B	0.000	0.042	0.000	NO	0.042		NO

ATTACHMENT 12 Pg 4

Table 3S (Continued)
Future With Project With Funded Improvements Conditions (Year 2030)
Intersection Peak Hour Levels of Service - Signalized Intersections

No.		Intersection	Peak Hour	Future without Project		Future with Project with TDM, Before Mitigations				Future with Project with Funded Improvements								
				V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?	V/C	LOS	Required Evolution Plan Mitigation V/C	Mitigation V/C Effectiveness	Required Metro Universal Mitigation V/C	Mitigation Shared with Metro Universal	Leftover Mitigation V/C after Metro Universal Required Credit	Required V/C Improvement to eliminate Evolution Plan Significant Impact	Residual Significant Impact?
64.	[a]	Highland Avenue & Camrose Drive	A.M.	0.744	C	0.765	C	0.021	NO	0.733	C	0.000	0.032	0.000	NO	0.032		NO
			P.M.	0.697	B	0.717	C	0.020	NO	0.678	B	0.000	0.039	0.000	NO	0.039		NO
65.	[a], [c]	Highland Avenue & Franklin Avenue	A.M.	-	F	-	F	0.029	YES	-	F	0.020	0.041	0.000	NO	0.041		NO
			P.M.	-	F	-	F	0.022	YES	-	F	0.013	0.041	0.000	NO	0.041		NO
66.	[a], [c]	Highland Avenue & Franklin Place/Franklin Avenue	A.M.	-	F	-	F	0.030	YES	-	F	0.021	0.039	0.002	YES	0.037		NO
			P.M.	-	F	-	F	0.019	YES	-	F	0.010	0.010	0.000	NO	0.010		NO
67.	[a]	Odin Street & Cahuenga Boulevard	A.M.	0.571	A	0.577	A	0.006	NO	0.577	A	0.000	0.000	0.000	NO	0.000		NO
			P.M.	0.771	C	0.787	C	0.016	NO	0.787	C	0.000	0.000	0.000	NO	0.000		NO
68.	[a]	Cahuenga Boulevard & US 101 NB Off-Ramp	A.M.	0.552	B	0.562	B	0.010	NO	0.567	A	0.000	0.095	0.000	NO	0.095		NO
			P.M.	1.071	F	1.101	F	0.030	YES	1.001	F	0.021	0.100	0.000	NO	0.100		NO
69.	[a]	Cahuenga Boulevard & Franklin Avenue	A.M.	0.875	D	0.879	D	0.004	NO	0.868	D	0.000	0.010	0.000	NO	0.010		NO
			P.M.	1.325	F	1.334	F	0.009	NO	1.324	F	0.000	0.010	0.000	NO	0.010		NO
70.	[a]	Cahuenga Boulevard & Hollywood Boulevard	A.M.	0.925	E	0.931	E	0.006	NO	0.931	E	0.000	0.000	0.000	NO	0.000		NO
			P.M.	0.825	D	0.834	D	0.009	NO	0.834	D	0.000	0.000	0.000	NO	0.000		NO
71.	[a]	Vine Street & Franklin Avenue/US 101 SB Off-Ramp	A.M.	0.555	B	0.557	B	0.002	NO	0.557	B	0.000	0.010	0.000	NO	0.010		NO
			P.M.	0.543	A	0.547	A	0.004	NO	0.537	A	0.000	0.010	0.000	NO	0.010		NO
74.		Pass Avenue & Magnolia Boulevard	A.M.	0.776	C	0.782	C	0.006	NO	0.799	C	0.000	-0.017	0.000	NO	0.000		NO
			P.M.	0.889	D	0.897	D	0.008	NO	0.892	D	0.000	0.005	0.000	NO	0.005		NO
75.		Pass Avenue & Verdugo Lane	A.M.	0.865	D	0.879	D	0.013	NO	0.849	D	0.000	0.030	0.000	NO	0.030		NO
			P.M.	1.203	F	1.217	F	0.014	YES	1.147	F	0.005	0.070	0.000	NO	0.070		NO
76.		Pass Avenue & Oak Street	A.M.	0.526	A	0.531	A	0.005	NO	0.545	A	0.000	-0.014	0.000	NO	0.000		NO
			P.M.	0.626	B	0.633	B	0.007	NO	0.633	B	0.000	0.000	0.000	NO	0.000		NO
77.	[a]	Evergreen Street/Riverside Drive & Alameda Avenue	A.M.	0.740	C	0.764	C	0.024	NO	0.748	C	0.000	0.016	0.000	NO	0.016		NO
			P.M.	0.827	D	0.868	D	0.041	YES	0.825	D	0.022	0.039	0.000	NO	0.039		NO
78.		Pass Avenue & SR 134 EB Off-Ramp	A.M.	0.789	C	0.797	C	0.008	NO	0.760	C	0.000	0.037	0.000	NO	0.037		NO
			P.M.	0.696	B	0.709	C	0.013	NO	0.659	B	0.000	0.050	0.000	NO	0.050		NO
79.	[a]	Pass Avenue & Alameda Avenue	A.M.	0.987	E	0.998	E	0.011	YES	0.983	E	0.002	0.015	0.000	NO	0.015		NO
			P.M.	1.079	F	1.093	F	0.015	YES	1.016	F	0.005	0.077	0.005	YES	0.072		NO
80.	[a]	Pass Avenue & Riverside Drive	A.M.	0.818	D	0.860	D	0.042	YES	0.762	C	0.023	0.058	0.000	NO	0.058		NO
			P.M.	0.641	B	0.675	B	0.034	NO	0.689	B	0.000	-0.014	0.000	NO	0.000		NO

ATTACHMENT 12 Pg 65

Table 35 (Continued)
Future With Project With Funded Improvements Conditions (Year 2030)
Intersection Peak Hour Levels of Service - Signalized Intersections

No.		Intersection	Peak Hour	Future without Project		Future with Project with TDM, Before Mitigations				Future with Project with Funded Improvements								
				V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?	V/C	LOS	Required Evolution Plan Mitigation V/C	Mitigation V/C Effectiveness	Required Metro Universal Mitigation V/C	Mitigation Shown with Metro Universal	Leftover Mitigation V/C after Metro Universal Required Credit	Required V/C Improvement to eliminate Evolution Plan Significant Impact	Residual Significant Impact?
31.	[c]	Olive Avenue & Pass Avenue	A.M. P.M.	0.967 0.948	E E	1.021 1.042	F F	0.054 0.094	YES YES	0.841 0.792	D C	0.045 0.085	0.180 0.249	0.000 0.000	NO NO	0.180 0.249		NO NO
32.	[c]	Olive Avenue & Warner Brothers Studios Gate 2/Gate 3	A.M. P.M.	0.807 0.853	D D	0.846 0.901	D E	0.039 0.048	YES YES	0.785 0.881	C D	0.020 0.029	0.061 0.020	0.000 0.000	NO NO	0.061 0.020	 0.009	NO YES
33.	[c]	Olive Avenue & Warner Brothers Studios Gate 1/Lakeside Drive	A.M. P.M.	0.552 0.825	B D	0.573 0.871	B D	0.021 0.046	NO YES	0.528 0.807	B D	0.000 0.027	0.045 0.064	0.000 0.000	NO NO	0.045 0.064		NO NO
34.	[c]	Hollywood Way & Alameda Avenue	A.M. P.M.	1.250 1.264	F F	1.264 1.272	F F	0.005 0.008	NO NO	1.268 1.272	F F	0.000 0.000	-0.004 0.000	0.000 0.000	NO NO	0.000 0.000		NO NO
35.	[c]	Cordova Street/SR 134 WB Off-Ramp & Alameda Avenue	A.M. P.M.	1.040 1.176	F F	1.045 1.182	F F	0.005 0.006	NO NO	1.045 1.182	F F	0.000 0.000	0.000 0.000	0.000 0.000	NO NO	0.000 0.000		NO NO
36.	[c]	Hollywood Way & Olive Avenue	A.M. P.M.	0.791 1.207	C F	0.818 1.231	D F	0.027 0.024	YES YES	0.791 1.212	C F	0.008 0.015	0.027 0.019	0.000 0.000	NO NO	0.027 0.019		NO NO
37.	[c]	Olive Avenue & Riverside Drive	A.M. P.M.	0.786 0.871	C D	0.795 0.880	C D	0.010 0.009	NO NO	0.750 0.842	C D	0.000 0.000	0.046 0.038	0.000 0.000	NO NO	0.046 0.038		NO NO
38.	[c]	Lima Street & Olive Avenue	A.M. P.M.	0.435 0.452	A A	0.444 0.463	A A	0.009 0.011	NO NO	0.415 0.433	A A	0.000 0.000	0.029 0.030	0.000 0.000	NO NO	0.029 0.030		NO NO
39.	[c]	Olive Avenue & Alameda Avenue	A.M. P.M.	0.937 1.109	E F	0.941 1.309	E F	0.004 0.008	NO NO	0.852 1.016	D F	0.000 0.000	0.089 0.093	0.000 0.000	NO NO	0.089 0.093		NO NO
40.		California Street & Riverside Drive	A.M. P.M.	0.505 0.821	B D	0.507 0.823	B D	0.002 0.002	NO NO	0.607 0.825	B D	0.000 0.000	0.000 0.003	0.000 0.000	NO NO	0.000 0.003		NO NO
41.	[c]	Bob Hope Drive & Alameda Avenue	A.M. P.M.	0.985 1.013	E F	0.990 1.017	E F	0.005 0.004	NO NO	0.990 1.017	E F	0.000 0.000	0.000 0.000	0.000 0.000	NO NO	0.000 0.000		NO NO
42.	[c]	Buena Vista Street & Alameda Avenue	A.M. P.M.	0.937 0.946	E E	0.939 0.948	E E	0.002 0.003	NO NO	0.935 0.946	E E	0.000 0.000	0.004 0.000	0.000 0.000	NO NO	0.004 0.000		NO NO
43.		Buena Vista Street/SR 134 EB On-Ramp & Riverside Drive/SR 134 WB Ramps	A.M. P.M.	1.075 1.020	F F	1.078 1.022	F F	0.001 0.002	NO NO	1.078 1.018	F F	0.000 0.000	0.003 0.004	0.000 0.000	NO NO	0.003 0.004		NO NO
44.	[c]	Buena Vista Street & Olive Avenue	A.M. P.M.	1.121 1.099	F F	1.127 1.102	F F	0.006 0.003	NO NO	1.081 1.054	F F	0.000 0.000	0.046 0.048	0.000 0.000	NO NO	0.046 0.048		NO NO
45.	[c], [e]	Sepulveda Boulevard & Ventura Boulevard	A.M. P.M.	1.291 1.485	F F	1.291 1.485	F F	0.000 0.000	NO NO	1.264 1.435	F F	0.000 0.000	0.027 0.000	0.000 0.000	NO NO	0.027 0.000		NO NO

ATTACHMENT 12 PG 6

Table 39 (Continued)
Future With Project With Funded Improvements Conditions (Year 2030)
Intersection Peak Hour Levels of Service - Signalized Intersections

No.		Intersection	Peak Hour	Future without Project		Future with Project with TDM, Before Mitigations				Future with Project with Funded Improvements								
				V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?	V/C	LOS	Required Evolution Plan Mitigation V/C	Mitigation V/C Effectiveness	Required Metro Universal Mitigation V/C	Mitigation Shared with Metro Universal	Leftover Mitigation V/C after Metro Universal Required Credit	Required V/C Improvement to eliminate Evolution Plan Significant Impact	Residual Significant Impact?
97.	[a]	Noble Avenue & Ventura Boulevard	A.M.	0.815	D	0.827	D	0.012	NO	0.790	C	0.000	0.037	0.000	NO	0.037		NO
			P.M.	0.878	D	0.884	D	0.011	NO	0.847	D	0.000	0.037	0.000	NO	0.037		NO
98.	[a]	Kester Avenue & Ventura Boulevard	A.M.	0.777	C	0.777	C	0.000	NO	0.753	C	0.000	0.024	0.000	NO	0.024		NO
			P.M.	0.818	D	0.828	D	0.010	NO	0.791	C	0.000	0.037	0.000	NO	0.037		NO
99.	[a]	Willis Avenue & Ventura Boulevard	A.M.	0.676	B	0.689	B	0.013	NO	0.652	B	0.000	0.037	0.000	NO	0.037		NO
			P.M.	0.729	C	0.747	C	0.018	NO	0.711	C	0.000	0.036	0.000	NO	0.036		NO
100.	[a]	Cedros Avenue (West) & Ventura Boulevard	A.M.	0.784	C	0.796	C	0.012	NO	0.759	C	0.000	0.037	0.000	NO	0.037		NO
			P.M.	0.941	E	0.959	E	0.018	YES	0.922	E	0.009	0.037	0.000	NO	0.037		NO
101.	[a]	Cedros Avenue (East) & Ventura Boulevard	A.M.	1.078	F	1.093	F	0.015	YES	1.054	F	0.006	0.039	0.000	NO	0.039		NO
			P.M.	0.835	D	0.841	D	0.006	NO	0.802	D	0.000	0.039	0.000	NO	0.039		NO
102.	[a]	Van Nuys Boulevard & Ventura Boulevard	A.M.	1.125	F	1.141	F	0.016	YES	1.101	F	0.007	0.040	0.000	NO	0.040		NO
			P.M.	1.297	F	1.318	F	0.021	YES	1.278	F	0.012	0.040	0.000	NO	0.040		NO
103.	[a]	Tyrone Avenue/Beverly Glen Boulevard & Ventura Boulevard	A.M.	0.864	D	0.877	D	0.013	NO	0.841	D	0.000	0.036	0.000	NO	0.036		NO
			P.M.	1.004	F	1.007	F	0.003	NO	0.971	E	0.000	0.036	0.000	NO	0.036		NO
104.	[a]	Hazeltine Avenue (West) & Ventura Boulevard	A.M.	0.751	C	0.765	C	0.014	NO	0.728	C	0.000	0.037	0.000	NO	0.037		NO
			P.M.	0.871	D	0.890	D	0.019	NO	0.853	D	0.000	0.037	0.000	NO	0.037		NO
105.	[a]	Stern Avenue (West) & Ventura Boulevard	A.M.	0.597	A	0.611	B	0.014	NO	0.575	A	0.000	0.036	0.000	NO	0.036		NO
			P.M.	0.605	B	0.625	B	0.020	NO	0.588	A	0.000	0.037	0.000	NO	0.037		NO
106.	[a], [c]	Woodman Avenue & Ventura Boulevard	A.M.	0.818	D	0.833	D	0.015	NO	0.796	C	0.000	0.037	0.000	NO	0.037		NO
			P.M.	0.903	E	0.923	E	0.020	YES	0.887	D	0.011	0.036	0.000	NO	0.036		NO
107.	[a]	Sunnyslope Avenue & Ventura Boulevard	A.M.	0.697	B	0.712	C	0.015	NO	0.675	B	0.000	0.037	0.000	NO	0.037		NO
			P.M.	0.634	B	0.644	B	0.010	NO	0.607	B	0.000	0.037	0.000	NO	0.037		NO
			A.M.	[illegible]	B	[illegible]		[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]		NO
			A.M.															NO
																		NO
																		NO
			P.M.			0.781		0.028	NO			0.000	0.037	0.000	NO	0.037		NO
			A.M.	1.217	F						F	0.017	0.040	0.007				NO

City of Los Angeles
Draft Environmental Impact Report

NBC Universal Evolution Plan
November 2010

* 2-4 BLOCKS OUTSIDE OF STUDIO CITY

ATTACHMENT 12 Pg 7

Table 3S (Continued)
Future With Project With Funded Improvements Conditions (Year 2030)
Intersection Peak Hour Levels of Service - Signalized Intersections

No.		Intersection	Peak Hour	Future without Project		Future with Project with TDM, Before Mitigations				Future with Project with Funded Improvements								
				V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?	V/C	LOS	Required Evolution Plan Mitigation V/C	Mitigation V/C Effectiveness	Required Metro Universal Mitigation V/C	Mitigation Shared with Metro Universal	Leftover Mitigation V/C after Metro Universal Required Credit	Required V/C Improvement to eliminate Evolution Plan Significant Impact	Residual Significant Impact?
112.	[a]	[illegible]	A.M.	0.744	C	0.753	C	0.010	NO	[illegible]	C	0.000	0.040	0.000	NO	0.040		NO
		[illegible]	P.M.	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.856	D	0.016	0.040	0.000	NO	[illegible]		NO
[illegible]		[illegible] Ventura Boulevard	A.M.	0.809	E	[illegible]	[illegible]	[illegible]	NO	[illegible]	[illegible]	0.000	0.037	0.000	NO	0.037		NO
			P.M.	0.731	C	0.754	C	0.023	NO	0.717	C	0.000	0.037	0.000	NO	0.037		NO
114.	[a]	[illegible] Ventura Boulevard	A.M.	[illegible]	E	0.701	C	0.001	NO	[illegible]	B	0.000	0.037	0.000	NO	[illegible]		NO
			P.M.	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	NO	[illegible]	B	0.000	0.037	0.000	NO	0.037		NO
115.	[a]	[illegible] [illegible] Boulevard	A.M.	[illegible]	E	[illegible]	E	0.001	YES	[illegible]	E	0.000	0.040	0.000	YES	0.027		NO
			P.M.	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	YES	1.058	F	0.018	0.040	0.000	YES	0.027		NO
116.	[a]	[illegible] [illegible] Boulevard	A.M.	[illegible]	[illegible]	[illegible]	B	0.002	NO	[illegible]	B	0.000	0.037	0.000	NO	[illegible]		NO
			P.M.	[illegible]	[illegible]	[illegible]	B	[illegible]	NO	0.616	B	0.000	0.034	0.000	NO	0.034		NO
118.	[a]	Lankershim Boulevard/Tujunga Avenue & Barbank Boulevard	A.M.	1.189	F	1.196	F	0.007	NO	1.186	F	0.000	0.010	0.000	NO	0.010		NO
			P.M.	1.170	F	1.175	F	0.005	NO	1.165	F	0.000	0.010	0.000	NO	0.010		NO
119.	[a]	Vineland Avenue & Burbank Boulevard	A.M.	0.843	D	0.848	D	0.005	NO	0.838	D	0.000	0.010	0.000	NO	0.010		NO
			P.M.	0.798	C	0.803	D	0.005	NO	0.793	C	0.000	0.010	0.000	NO	0.010		NO
120.	[a]	Cahuenga Boulevard & Burbank Boulevard	A.M.	1.169	F	1.174	F	0.005	NO	1.147	F	0.000	0.027	0.000	NO	0.027		NO
			P.M.	1.080	F	1.084	F	0.004	NO	1.074	F	0.000	0.010	0.000	NO	0.010		NO
121.	[a]	Cahuenga Boulevard & Chandler Boulevard	A.M.	0.471	A	0.475	A	0.004	NO	0.453	A	0.000	0.022	0.000	NO	0.022		NO
			P.M.	0.706	C	0.713	C	0.007	NO	0.697	B	0.000	0.016	0.000	NO	0.016		NO
122.		La Cienega Boulevard & Sunset Boulevard	A.M.	0.831	D	0.839	D	0.008	NO	0.839	D	0.000	0.000	0.000	NO	0.000		NO
			P.M.	1.218	F	1.227	F	0.009	NO	1.227	F	0.000	0.000	0.000	NO	0.000		NO
123.	[a]	La Cienega Boulevard & Santa Monica Boulevard	A.M.	1.057	F	1.068	F	0.021	NO	1.068	F	0.000	0.000	0.000	NO	0.000		NO
			P.M.	0.916	E	0.919	E	0.003	NO	0.919	E	0.000	0.000	0.000	NO	0.000		NO
124.	[a]	Laurel Canyon Boulevard & Hollywood Boulevard	A.M.	0.597	B	0.608	B	0.021	NO	0.588	A	0.000	0.010	0.000	NO	0.010		NO
			P.M.	0.754	C	0.755	C	0.001	NO	0.745	C	0.000	0.010	0.000	NO	0.010		NO
125.	[a]	Crescent Heights Boulevard & Sunset Boulevard	A.M.	1.243	F	1.249	F	0.006	NO	1.249	F	0.000	0.000	0.000	NO	0.000		NO
			P.M.	0.981	E	0.983	E	0.002	NO	0.983	E	0.000	0.000	0.000	NO	0.000		NO
126.	[a]	Fairfax Avenue & Hollywood Boulevard	A.M.	0.950	E	0.965	E	0.016	YES	0.873	D	0.007	0.093	0.000	NO	0.093		NO
			P.M.	0.875	D	0.880	D	0.005	NO	0.880	D	0.000	0.000	0.000	NO	0.000		NO
127.	[a]	Fairfax Avenue & Sunset Boulevard	A.M.	0.728	C	0.740	C	0.012	NO	0.740	C	0.000	0.000	0.000	NO	0.000		NO
			P.M.	0.549	E	0.558	E	0.009	NO	0.558	E	0.000	0.000	0.000	NO	0.000		NO

ATTACHMENT 17 A98

Table 33 (Continued)
Future With Project With Funded Improvements Conditions (Year 2030)
Intersection Peak Hour Levels of Service - Signalized Intersections

No.		Intersection	Peak Hour	Future without Project		Future with Project with TDM, Before Mitigations				Future with Project with Funded Improvements								
				V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?	V/C	LOS	Required Evolution Plan Mitigation V/C	Mitigation V/C Effectiveness	Required Metro Universal Mitigation V/C	Mitigation Shared with Metro Universal	Leftover Mitigation V/C after Metro Universal Required Credit	Required V/C Improvement to eliminate Evolution Plan Significant Impact	Residual Significant Impact?
128.	[a], [d]	La Brea Avenue & Franklin Avenue	A.M.	-	E	-	E	0.013	YES	-	E	0.009	0.010	0.000	NO	0.010		NO
			P.M.	-	E	-	E	0.019	YES	-	E	0.010	0.010	0.000	NO	0.010		NO
129.	[a]	La Brea Avenue & Hollywood Boulevard	A.M.	1.026	F	1.054	F	0.028	YES	0.997	E	0.019	0.057	0.000	NO	0.057		NO
			P.M.	0.930	E	0.948	E	0.018	YES	0.908	E	0.009	0.040	0.000	NO	0.040		NO
130.	[a]	La Brea Avenue & Sunset Boulevard	A.M.	0.929	E	0.943	E	0.014	YES	0.938	E	0.005	0.010	0.000	NO	0.010		NO
			P.M.	1.091	F	1.110	F	0.019	YES	1.100	F	0.010	0.010	0.000	NO	0.010		NO
131.		La Brea Avenue & Fountain Avenue	A.M.	1.078	F	1.085	F	0.009	NO	1.085	F	0.000	0.000	0.000	NO	0.000		NO
			P.M.	1.033	F	1.037	F	0.004	NO	1.037	F	0.000	0.000	0.000	NO	0.000		NO
132.		La Brea Avenue & Santa Monica Boulevard	A.M.	0.977	E	0.985	E	0.008	NO	0.985	E	0.000	0.000	0.000	NO	0.000		NO
			P.M.	1.080	F	1.085	F	0.005	NO	1.085	F	0.000	0.000	0.000	NO	0.000		NO
133.	[a], [d]	Highland Avenue & Hollywood Boulevard	A.M.	-	F	-	F	0.023	YES	-	F	0.019	0.042	0.002	YES	0.040		NO
			P.M.	-	F	-	F	0.033	YES	-	F	0.030	0.138	0.002	YES	0.136		NO
134.	[a]	Highland Avenue & Sunset Boulevard	A.M.	0.930	E	0.970	E	0.040	YES	0.854	D	0.031	0.105	0.000	NO	0.105		NO
			P.M.	0.895	D	0.930	E	0.034	YES	0.888	D	0.025	0.042	0.000	NO	0.042		NO
135.	[a]	Highland Avenue & Fountain Avenue	A.M.	0.991	E	1.000	E	0.009	NO	0.990	E	0.000	0.010	0.000	NO	0.010		NO
			P.M.	0.793	C	0.805	D	0.012	NO	0.795	C	0.000	0.010	0.000	NO	0.010		NO
136.	[a], [d]	Highland Avenue & Santa Monica Boulevard	A.M.	0.918	E	0.927	E	0.009	NO	0.917	E	0.000	0.010	0.000	NO	0.010		NO
			P.M.	0.938	E	0.940	E	0.002	NO	0.930	E	0.000	0.010	0.000	NO	0.010		NO
137.	[a]	Kester Avenue (East) & Ventura Boulevard	A.M.	0.697	B	0.709	C	0.012	NO	0.672	B	0.000	0.037	0.000	NO	0.037		NO
			P.M.	0.995	E	1.012	F	0.017	YES	0.977	E	0.008	0.036	0.000	NO	0.036		NO
138.		San Vicente Boulevard/Clark St & Sunset Boulevard	A.M.	0.959	E	0.966	E	0.007	NO	0.966	E	0.000	0.000	0.000	NO	0.000		NO
			P.M.	1.117	F	1.123	F	0.006	NO	1.123	F	0.000	0.000	0.000	NO	0.000		NO
139.	[a]	Cahuenga Boulevard & Sunset Boulevard	A.M.	0.907	E	0.909	E	0.002	NO	0.899	D	0.000	0.010	0.000	NO	0.010		NO
			P.M.	0.814	D	0.822	D	0.008	NO	0.812	D	0.000	0.010	0.000	NO	0.010		NO
140.	[a]	Lankershim Boulevard & Chandler Boulevard (North)	A.M.	0.594	A	0.602	B	0.008	NO	0.602	B	0.000	0.000	0.000	NO	0.000		NO
			P.M.	0.353	A	0.362	A	0.009	NO	0.362	A	0.000	0.000	0.000	NO	0.000		NO
141.	[a]	SR 170 SB Ramps & Magnolia Boulevard	A.M.	0.776	C	0.785	C	0.009	NO	0.746	C	0.000	0.039	0.000	NO	0.039		NO
			P.M.	0.606	B	0.609	B	0.003	NO	0.566	A	0.000	0.043	0.000	NO	0.043		NO
142.	[a]	SR 170 NB Ramps & Magnolia Boulevard	A.M.	0.551	A	0.561	A	0.010	NO	0.521	A	0.000	0.040	0.000	NO	0.040		NO
			P.M.	0.712	C	0.715	C	0.003	NO	0.705	C	0.000	0.010	0.000	NO	0.010		NO

ATTACHMENT 12 Pg 9

Table 3S (Continued)
Future With Project With Funded Improvements Conditions (Year 2030)
Intersection Peak Hour Levels of Service - Signalized Intersections

No.		Intersection	Peak Hour	Future without Project		Future with Project with TDM, Before Mitigations				Future with Project with Funded Improvements								
				V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?	V/C	LOS	Required Evolution Plan Mitigation V/C	Mitigation V/C Effectiveness	Required Metro Universal Mitigation V/C	Mitigation Shared with Metro Universal	Leftover Mitigation V/C after Metro Universal Required Credit	Required V/C Improvement to eliminate Evolution Plan Significant Impact	Residual Significant Impact?
144.	[a]	Coldwater Canyon Avenue & [illegible]	A.M.	[illegible]	A	0.568	A	[illegible]	NO	0.552	A	0.000	0.010	0.000	NO	0.010		NO
		[illegible] NB Ramps	P.M.	0.537	A	[illegible]	A	0.002	NO	0.543	A	0.000	0.010	0.000	NO	0.010		NO
145.	[a]	Coldwater Canyon Avenue & [illegible]	A.M.	0.632	B	[illegible]	B	0.001	NO	0.623	B	0.000	0.010	0.000	NO	0.010		NO
		[illegible] SB Ramps	P.M.	0.635	B	0.637	B	0.002	NO	0.627	A	0.000	0.010	0.000	NO	0.010		NO
146.	[a]	Coldwater Canyon Avenue & [illegible]	A.M.	0.953	E	0.955	E	0.002	NO	0.945	E	0.000	0.010	0.000	NO	0.010		NO
		Moorpark Street	P.M.	1.100	F	1.103	F	0.003	NO	1.095	F	0.000	0.010	0.000	NO	0.010		NO
147.	[a]	Laurel Canyon Boulevard & [illegible]	A.M.	0.753	C	[illegible]	C	[illegible]	NO	0.756	C	0.000	0.010	0.000	NO	0.010		NO
		US 101 NB Ramps	P.M.	0.662	B	0.662	B	0.000	NO	0.662	B	0.000	0.010	0.000	NO	0.010		NO
148.	[a]	Laurel Canyon Boulevard & US 101 SB Ramps	A.M.	0.735	C	0.736	C	0.001	NO	0.726	C	0.000	0.010	0.000	NO	0.010		NO
			P.M.	0.646	B	0.646	B	0.000	NO	0.636	B	0.000	0.010	0.000	NO	0.010		NO
149.	[a]	Laurel Canyon Boulevard & Moorpark Street	A.M.	1.174	F	1.178	F	0.004	NO	1.168	F	0.000	0.010	0.000	NO	0.010		NO
			P.M.	1.287	F	1.292	F	0.005	NO	1.282	F	0.000	0.010	0.000	NO	0.010		NO
150.	[a]	Colfax Avenue & Riverside Drive	A.M.	1.000	E	1.001	F	0.001	NO	0.991	E	0.000	0.010	0.000	NO	0.010		NO
			P.M.	1.005	F	1.007	F	0.002	NO	0.997	E	0.000	0.010	0.000	NO	0.010		NO
151.	[a]	Colfax Avenue & Moorpark Street	A.M.	0.854	D	0.856	D	0.002	NO	0.855	D	0.000	0.010	0.000	NO	0.010		NO
			P.M.	0.554	B	0.555	B	0.001	NO	0.645	B	0.000	0.010	0.000	NO	0.010		NO
152.	[a]	Lankershim Boulevard & Chandler Boulevard (South)	A.M.	0.758	C	0.767	C	0.009	NO	0.767	C	0.000	0.000	0.000	NO	0.000		NO
			P.M.	0.609	B	0.620	B	0.011	NO	0.620	B	0.000	0.000	0.000	NO	0.000		NO
153.	[a]	Hollywood Way & Verdugo Avenue	A.M.	1.265	F	1.270	F	0.005	NO	1.273	F	0.000	-0.003	0.000	NO	0.000		NO
			P.M.	1.152	F	1.159	F	0.007	NO	1.165	F	0.000	0.004	0.007	NO	0.000		NO
154.	[a]	Hollywood Way & Magnolia Boulevard	A.M.	1.277	F	1.281	F	0.004	NO	1.285	F	0.000	-0.004	0.000	NO	0.000		NO
			P.M.	1.053	F	1.059	F	0.006	NO	1.059	F	0.000	0.000	0.000	NO	0.000		NO
155.	[a]	Buena Vista Street & Verdugo Avenue	A.M.	1.012	F	1.013	F	0.001	NO	1.015	F	0.000	-0.002	0.000	NO	0.000		NO
			P.M.	1.175	F	1.181	F	0.005	NO	1.178	F	0.000	0.003	0.000	NO	0.000		NO
156.	[a]	Buena Vista Street & Magnolia Boulevard	A.M.	1.068	F	1.072	F	0.004	NO	1.073	F	0.000	-0.001	0.000	NO	0.000		NO
			P.M.	1.147	F	1.148	F	0.001	NO	1.148	F	0.000	0.000	0.000	NO	0.000		NO

ATTACHMENT 12 Ag 10

Table 39 (Continued)
Future With Project With Funded Improvements Conditions (Year 2030)
Intersection Peak Hour Levels of Service - Signalized Intersections

No.		Intersection	Peak Hour	Future without Project		Future with Project with TDM, Before Mitigations				Future with Project with Funded Improvements								
				V/C	LOS	V/C	LOS	Change in V/C	Significant Impact?	V/C	LOS	Required Evolution Plan Mitigation V/C	Mitigation V/C Effectiveness	Required Metro Universal Mitigation V/C	Mitigation Shared with Metro Universal	Leftover Mitigation V/C after Metro Universal Required Credit	Required V/C Improvement to eliminate Evolution Plan Significant Impact	Residual Significant Impact?
60		Vineland Avenue & US 101 SB Ramps	A.M.	0.784	C	0.800	C	0.016	NO	0.780	A	0.000	0.020	0.000	NO	0.780		NO
			P.M.	0.884	D	0.900	D	0.016	NO	0.880	A	0.000	0.020	0.000	NO	0.880		NO

[a] Intersection is operating under the LADOT Adaptive Traffic Control System (ATCS). A credit of 0.10 in V/C ratio was included in the analysis.
[b] The mitigation proposed for the intersection by Metro Universal was further expanded by the NBC Universal Evolution Plan.
[c] Denotes CMP arterial monitoring station.
[d] Traffic counts at this location were not fully representative of the situation due to downstream constraints and pedestrian conflicts. LOS is based on field observations and has not been calculated based on the Universal City Transportation Model.
[e] Intersection is connected to the City of Burbank's Traffic Signal Interconnect & Signal Timing System. A credit of 0.02 in V/C ratio was included in the analysis.

Intersection Impact Summary

Level of Service	Number of Impacted Intersections before TDM and Funded Improvements		Number of Impacted Intersections after TDM		Number of Residual Impacted Intersections after TDM and Funded Improvements	
	A.M. Peak Hour	P.M. Peak Hour	A.M. Peak Hour	P.M. Peak Hour	A.M. Peak Hour	P.M. Peak Hour
C	5	6	5	2	1	3
D	15	3	8	8	0	1
Total Residual Peak Hour Impacts at LOS C or D					1	4
Total Individual Intersections with Residual Impacts at LOS C or D [a]					*5*	
E	13	12	12	13	0	0
F	36	39	30	31	3	2 [b]
Total Residual Peak Hour Impacts at LOS E or F					3	*2 [b]*
Total Individual Intersections with Residual Impacts at LOS E or F					*3 [b]*	
Total Peak Hour Residual Impacts	69	65	55	54	4	6 [b]
Total Individual Intersections with Residual Impacts	32		70		8	

[a] While the Project has residual significant impacts at 5 individual intersections operating at LOS C or D, it should be noted that LOS D or better is considered an acceptable LOS by LADOT.
[b] This analysis conservatively assumes the proposed physical improvement for the intersection of Cahuenga Boulevard & Moorpark Street would not be implemented. In the event that this improvements implemented, the number of impacted intersections mitigation would be 4 in the morning peak hour and 5 in the afternoon peak hour (total of 8 intersections).

ATTACHMENT 12 Ag 11

Response to Comment No. 12-398

Attachment 12 consists of a copy of pages 802–812 from the Draft EIR, with notations added by the commenter regarding the sharing of mitigation measures and the location of intersections in relation to Studio City, and is referenced in Comment Nos. 12-244, 12-245, and 12-246. The commenter is referred to Response to Comment Nos. 12-244, 12-245, and 12-246, above.

Comment No. 12-399

See next page

SHARED MITIGATION W METRO – UNSIGNALIZED INTERSECTIONS –

Table 40
Future With Project With Funded Improvements Conditions (Year 2030), Los Angeles CEQA Thresholds Guide Methodology
Intersection Peak Hour Levels of Service – Unsignalized Intersections

No.		Intersection	Peak Hour	Future without Project		Future with Project with TDM, Before Mitigations				Future with Project with Funded Improvements								
				V/C or Delay	LOS	V/C or Delay	LOS	Change in V/C	Significant Impact?	V/C or Delay	LOS	Required Evolution Plan Mitigation V/C	Mitigation V/C Effectiveness	Required Metro Universal Mitigation V/C	Mitigation Shared with Metro Universal	Leftover Mitigation V/C after Metro Universal Required Credit	Required V/C improvement to eliminate Evolution Plan Significant Impact	Residual Significant Impact?
15.	[b], [c]	SR 134 EB On-Ramp c/o Vineland Avenue & Riverside Drive	A.M.	--	F	--	F			-	N/A							
			P.M.	--	F	--	F			-	N/A							
		Analysis using CMA Methodology [a]	A.M.	1.127	F	1.138	F	0.011	YES	0.567	A	0.000	0.571	0.000	NO	0.571		NO
			P.M.	1.083	F	1.116	F	0.033	YES	0.868	B	0.024	0.448	0.000	NO	0.448		NO
22.	[c], [d]	Cahuenga Boulevard & Valley Spring Lane	A.M.	--	F	--	F			-	N/A							
			P.M.	--	F	--	F			-	N/A							
		Analysis using CMA Methodology [a]	A.M.	0.894	D	0.970	E	0.076	YES	0.594	A	0.067	0.336	0.102	YES	0.284		NO
			P.M.	0.953	E	1.039	F	0.086	YES	0.721	C	0.077	0.318	0.113	YES	0.295		NO
60.	[c]	Forest Lawn Drive & SR 134 EB Ramps	A.M.	--	F	--	F			25.3	D							
			P.M.	35.1	E	39.5	E			16.1	C							
		Analysis using CMA Methodology [a]	A.M.	1.587	F	1.613	F	0.026	YES	0.884	D	0.017	0.729	0.000	NO	0.729		NO
			P.M.	0.880	D	0.908	E	0.028	YES	0.816	B	0.009	0.292	0.000	NO	0.292		NO
61.	[c], [d]	Forest Lawn Drive & SR 134 WB Ramps	A.M.	--	F	--	F			-	N/A							
			P.M.	--	F	--	F			-	N/A							
		Analysis using CMA Methodology [a]	A.M.	0.995	E	0.922	E	0.017	YES	0.603	B	0.005	0.239	0.000	NO	0.239		NO
			P.M.	0.643	B	0.659	B	0.016	NO	0.445	A	0.000	0.214	0.000	NO	0.214		NO
72.	[c], [d]	Lankershim Boulevard & Muddy Waters Drive	A.M.	--	F	--	F			-	N/A							
			P.M.	--	F	--	F			-	N/A							
		Analysis using CMA Methodology [a]	A.M.	0.828	D	0.904	E	0.076	YES	0.508	A	0.057	0.396	0.070	YES	0.326		NO
			P.M.	1.083	F	1.200	F	0.117	YES	0.554	D	0.108	0.346	0.114	YES	0.232		NO
73.	[c]	Lankershim Boulevard & Jimi Hendrix Drive	A.M.	14.1	B	15.6	C			15.0	C							
			P.M.	24.1	C	30.7	D			23.2	D							
		Analysis using CMA Methodology [a]	A.M.	0.921	E	0.973	E	0.052	YES	0.452	B	0.040	-0.121	0.000	YES	0.052		NO
			P.M.	0.883	D	0.962	E	0.079	YES	0.970	E	0.080	-0.026	0.000	YES	0.000	0.000	YES
94.	[c]	SR 134 EB On-Ramp/Screenland Drive & Riverside Drive	A.M.	13.2	B	13.3	B			13.3	B							
			P.M.	33.6	D	34.5	D			33.8	D							
		Analysis using CMA Methodology [a]	A.M.	0.745	C	0.747	C	0.002	NO	0.747	C	0.000	0.000	0.000	NO	0.000		NO
			P.M.	0.893	D	0.895	D	0.002	NO	0.895	D	0.000	0.000	0.000	NO	0.000		NO
117.	[b], [c]	US 101 SB On-Ramp c/o Lankershim Boulevard & Universal Boulevard	A.M.	0.0	A	0.0	A			-	N/A							
			P.M.	0.0	A	0.0	A											
		Analysis using CMA Methodology [a]	A.M.	0.715	C	0.744	C			0.652	B	0.000	0.116	0.000	NO	0.116		NO
			P.M.	0.450	A	0.458	A			0.682	B	0.000	-0.234	0.000	NO	-0.234		NO

ATTACHMENT # 13

Table 40 (Continued)
Future With Project With Funded Improvements Conditions (Year 2030), Los Angeles CEQA Thresholds Guide Methodology
Intersection Peak Hour Levels of Service – Unsignalized Intersections

No.		Intersection	Peak Hour	Future without Project		Future with Project with TDM, Before Mitigations				Future with Project with Funded Improvements								
				V/C or Delay	LOS	V/C or Delay	LOS	Change in V/C	Significant Impact?	V/C or Delay	LOS	Required Evolution Plan Mitigation V/C	Mitigation V/C Effectiveness	Required Metro Universal Mitigation V/C	Mitigation Shared with Metro Universal	Leftover Mitigation V/C after Metro Universal Required Credit	Required V/C Improvement to eliminate Evolution Plan Significant Impact	Residual Significant Impact?
156.	[b]	Tujunga Avenue & SR 170 NB On-Ramp/Private Driveway	A.M.	16.5	C	17.0	C			17.0	C							
			P.M.	13.5	B	13.1	B			13.1	B							
		Analysis using CMA Methodology [a]	A.M.	0.748	C	0.764	C	0.016	NO	0.764	C	0.000	0.000	0.000	NO	0.000		NO
			P.M.	0.687	B	0.713	C	0.025	NO	0.713	C	0.000	0.000	0.000	NO	0.000		NO
157.	[c], [d]	Tujunga Avenue & US 101 SB Off-Ramp	A.M.	16.0	C	16.0	C			-	N/A							
			P.M.	53.0	F	53.0	F			-	N/A							
		Analysis using CMA Methodology [a]	A.M.	0.526	A	0.526	A	0.000	NO	0.526	A	0.000	0.000	0.000	NO	0.000		NO
			P.M.	0.888	D	0.888	D	0.000	NO	0.606	B	0.000	0.277	0.000	NO	0.277		NO
158.	[b]	Tujunga Avenue & US 101 NB On-Ramp	A.M.	12.2	B	12.2	B			12.2	B							NO
			P.M.	10.6	B	10.6	B			10.6	B							NO
		Analysis using CMA Methodology [a]	A.M.	0.586	A	0.586	A	0.000	NO	0.586	A	0.000	0.000	0.000	NO	0.000		NO
			P.M.	0.662	B	0.662	B	0.000	NO	0.662	B	0.000	0.000	0.000	NO	0.000		NO
159.	[c]	US 101 SB Off-Ramp & Riverside Drive	A.M.	25.3	D	31.4	D			20.5	C							
			P.M.	14.5	B	15.0	B			14.0	B							
		Analysis using CMA Methodology [a]	A.M.	0.747	C	0.803	D	0.056	YES	0.681	B	0.017	0.122	0.006	YES	0.116		NO
			P.M.	0.556	A	0.580	A	0.024	NO	0.551	A	0.000	0.029	0.000	NO	0.029		NO
161.	[b], [c]	US 101 NB On-Ramp & Moorpark Street	A.M.	11.9	B	11.9	B			-	N/A							
			P.M.	18.0	C	18.7	C			-	N/A							
		Analysis using CMA Methodology [a]	A.M.	0.565	B	0.572	B	0.007	NO	0.642	B	0.000	0.003	0.000	NO	0.003		NO
			P.M.	0.803	D	0.854	D	0.051	YES	0.824	D	0.003	0.030	0.000	NO	0.030		NO
162.	[c], [d]	Cahuenga Boulevard & US 101 SB Ramps	A.M.	-	F	-	F			-	N/A							
			P.M.	-	F	-	F			-	N/A							
		Analysis using CMA Methodology [a]	A.M.	1.451	F	1.466	F	0.015	YES	1.160	F	0.000	0.306	0.000	NO	0.306		NO
			P.M.	1.879	F	1.705	F	0.026	YES	1.336	F	0.017	0.360	0.000	NO	0.360		NO
163.	[d]	Bob Hope Drive & SR 134 EB Off-Ramp	A.M.	-	F	-	F			-	F							
			P.M.	-	F	-	F			-	F							
		Analysis using CMA Methodology [a]	A.M.	0.815	D	0.815	D	0.000	NO	0.815	D	0.000	0.000	0.000	NO	0.000		NO
			P.M.	0.958	E	0.958	E	0.000	NO	0.958	E	0.000	0.000	0.000	NO	0.000		NO
164.	[b], [c]	SR 134 WB On-Ramp & Alameda Avenue	A.M.	41.2	E	41.2	E			-	N/A							
			P.M.	49.5	E	51.2	F			-	N/A							
		Analysis using CMA Methodology [a]	A.M.	0.532	D	0.583	D	0.051	NO	0.605	B	0.000	0.277	0.000	NO	0.277		NO
			P.M.	0.360	D	0.360	D	0.000	NO	0.588	A	0.000	0.272	0.000	NO	0.272		NO

OK NORTH HOLLYWOOD

ATTACHMENT 13 Pg 2

Table 40 (Continued)
Future With Project With Funded Improvements Conditions (Year 2030), Los Angeles CEQA Thresholds Guide Methodology
Intersection Peak Hour Levels of Service – Unsignalized Intersections

No.	Intersection	Peak Hour	Future without Project		Future with Project with TDM, Before Mitigations				Future with Project with Funded Improvements								
			V/C or Delay	LOS	V/C or Delay	LOS	Change in V/C	Significant Impact?	V/C or Delay	LOS	Required Evolution Plan Mitigation V/C	Mitigation V/C Effectiveness	Required Metro Universal Mitigation V/C	Mitigation Shared with Metro Universal	Leftover Mitigation V/C after Metro Universal Required Credit	Required V/C improvement to eliminate Evolution Plan Significant Impact	Residual Significant Impact?

[a] *Per the Los Angeles CEQA Thresholds Guide, unsignalized intersections operating at LOS C, D, E, or F using the 2000 HCM methodology are required to be analyzed using the CMA methodology for signalized intersections for determination of significant impacts.*
[b] *Intersection is uncontrolled. Analysis was done using 2000 Highway Capacity Manual Two-Way Stop-Controlled methodology. For the purpose of evaluating the operating conditions of the intersection, level of service is based on average vehicular delay in seconds for the most constrained approach rather than V/C ratio.*
[c] *Intersection is proposed to be signalized as part of the Project improvement program and will operate under the LADOT Adaptive Traffic Control System (ATCS). A credit of 0.10 in V/C ratio was included in the analysis.*
[d] *Intersection is controlled by stop signs on minor approach. Analysis was done using 2000 Highway Capacity Manual Two-Way Stop-Controlled methodology. For the purpose of evaluating the operating conditions of the intersection, level of service is based on average vehicular delay in seconds for the most constrained approach rather than V/C ratio.*
-- *Indicates oversaturated conditions, i.e. long waits at the approaches controlled by stop signs. Delay cannot be calculated.*

Unsignalized Intersections Impact Summary

Level of Service	Number of Impacted Intersections with TDM, before Mitigations		Number of Residual Impacted Intersections after TDM and Funded Improvements	
	A.M. Peak Hour	P.M. Peak Hour	A.M. Peak Hour	P.M. Peak Hour
C	1	1	0	0
D	1	1	0	1
E	0	1	0	0
F	6	4	0	0
Total Peak Hour Impacts	8	7	0	1
Total Individual Intersections Impacted	9		1	

ATTACHMENT 13 Ag 3

Response to Comment No. 12-399

Attachment 13 consists of a copy of pages 813–815 from the Draft EIR, with notations added by the commenter regarding the sharing of mitigation measures and a location in North Hollywood, and is referenced in Comment No. 12-247. The commenter is referred to Response to Comment No. 12-247, above.

Comment No. 12-400

See next page

Table 41
Future with Project with Funded Improvements Conditions (Year 2030)
Freeway Segment Levels of Service - A.M. Peak Hour

AM PEAK HOURS

No.	Freeway Segment	Direction	Number of Lanes[a]	Capacity	Future without Project			Future with Project, Before Mitigations					Future with Project with Funded Improvements						
					Volume	V/C	LOS	Volume	V/C	LOS	Increase in V/C	Significant Impact?	Number of Lanes[a]	Capacity	Volume	V/C	LOS	Increase in V/C	Significant Impact?
1.	US 101	NB	4	8,000	9,688	1.21	F(0)	9,784	1.22	F(0)	0.012	NO	4	8,000	9,784	1.22	F(0)	0.012	NO
	south of Alvarado Street	SB	4	8,000	13,000	1.63	F(3)	13,092	1.64	F(3)	0.012	NO	4	8,000	13,092	1.64	F(3)	0.012	NO
2.	US 101	NB	4	8,000	9,526	1.19	F(0)	9,631	1.20	F(0)	0.013	NO	4	8,000	9,631	1.20	F(0)	0.013	NO
	south of Vermont Avenue	SB	4	8,000	12,712	1.59	F(3)	12,833	1.60	F(3)	0.015	NO	4	8,000	12,833	1.60	F(3)	0.015	NO
3. *	US 101	NB	4	8,000	8,052	1.01	F(0)	8,188	1.02	F(0)	0.017	NO	4	8,000	8,188	1.02	F(0)	0.017	NO
	south of Santa Monica Boulevard	SB	4	8,000	12,171	1.52	F(3)	12,316	1.54	F(3)	0.019	NO	4	8,000	12,316	1.54	F(3)	0.019	NO
4.	US 101	NB	5	10,000	9,785	0.98	E	10,046	1.01	F(0)	0.026	YES	5	10,000	10,046	1.01	F(0)	0.026	YES
	south of Barham Boulevard	SB	5	10,000	13,386	1.34	F(1)	13,600	1.36	F(2)	0.021	YES	5	10,000	13,600	1.36	F(2)	0.021	YES
5.	US 101	NB	5	10,000	8,139	0.82	D	8,339	0.83	D	0.017	NO	5	10,000	8,339	0.83	D	0.017	NO
	north of Camino de Cahuenga Way	SB	5	10,000	11,213	1.12	F(0)	11,255	1.13	F(0)	0.005	NO	5.5	11,000	12,095	1.10	F(0)	0.021	NO
6. *	US 101	NB	5	10,000	9,769	0.98	D	9,969	1.00	E	0.008	NO	5	10,000	9,969	1.00	E	0.008	NO
	east of Coldwater Canyon Avenue	SB	5	10,000	10,679	1.07	F(0)	10,776	1.08	F(0)	0.010	NO	5	10,000	10,776	1.08	F(0)	0.010	NO
7	US 101	NB	5.5	11,000	10,078	0.78	D	10,137	0.78	D	0.005	NO	6.5	13,000	10,137	0.78	D	0.005	NO
	east of I-405	SB	6	12,000	11,576	0.97	E	11,756	0.98	E	0.009	NO	6	12,000	11,756	0.98	E	0.009	NO
8. *	SR 134 @	EB	4.5	9,000	12,898	1.43	F(2)	12,953	1.44	F(2)	0.006	NO	4.5	9,000	12,953	1.44	F(2)	0.006	NO
	Forman Avenue	WB	4.5	9,000	8,362	0.93	D	8,457	0.94	E	0.014	NO	4.5	9,000	8,462	0.94	E	0.011	NO
9.	SR 134	EB	4.5	9,000	12,708	1.41	F(2)	12,828	1.43	F(2)	0.013	NO	4.5	9,000	12,828	1.43	F(2)	0.013	NO
	east of Forest Lawn Drive	WB	4.5	9,000	11,110	1.23	F(0)	11,245	1.25	F(0)	0.015	NO	4.5	9,000	11,230	1.25	F(0)	0.014	NO
10.	SR 170	NB	4.5	9,000	7,218	0.80	D	7,328	0.81	D	0.012	NO	4.5	9,000	7,328	0.81	D	0.012	NO
	north of Magnolia Boulevard	SB	4.5	9,000	11,560	1.28	F(1)	11,721	1.30	F(1)	0.018	NO	4.5	9,000	11,721	1.30	F(1)	0.018	NO
11. *	SR 170	NB	4.5	9,000	6,199	0.69	C	6,268	0.70	C	0.007	NO	4.5	9,000	6,268	0.70	C	0.007	NO
	south of Sherman Way	SB	4.5	9,000	10,718	1.19	F(0)	10,859	1.21	F(0)	0.016	NO	4.5	9,000	10,859	1.21	F(0)	0.016	NO
12. *	I-5 @	NB	5.5	11,000	10,077	0.92	D	10,087	0.92	D	0.001	NO	5.5	11,000	10,087	0.92	D	0.001	NO
	Colorado Boulevard Extension	SB	5.5	11,000	11,542	1.05	F(0)	11,566	1.05	F(0)	0.002	NO	5.5	11,000	11,566	1.05	F(0)	0.002	NO
13. *	I-5	NB	4	8,000	8,197	1.03	F(0)	8,197	1.03	F(0)	0.000	NO	4	8,000	8,197	1.03	F(0)	0.000	NO
	south of Burbank Boulevard	SB	4	8,000	10,867	1.36	F(2)	10,867	1.36	F(2)	0.000	NO	4	8,000	10,867	1.36	F(2)	0.000	NO
14. *	I-405	NB	5.5	11,000	9,846	0.90	D	9,870	0.90	D	0.002	NO	5.5	11,000	9,870	0.90	D	0.002	NO
	south of Mulholland Drive	SB	5.5	11,000	13,598	1.24	F(0)	13,603	1.24	F(0)	0.001	NO	5.5	11,000	13,603	1.24	F(0)	0.001	NO
15.	I-405	NB	5	10,000	9,657	0.97	E	9,682	0.97	E	0.002	NO	5	10,000	9,682	0.97	E	0.002	NO
	south of US 101	SB	5.5	11,000	13,336	1.21	F(0)	13,341	1.21	F(0)	0.001	NO	5.5	11,000	13,341	1.21	F(0)	0.001	NO
16.	I-405	NB	4.5	9,000	7,403	0.82	D	7,413	0.82	D	0.001	NO	4.5	9,000	7,413	0.82	D	0.001	NO
	north of US 101	SB	4.5	9,000	10,339	1.15	F(0)	10,345	1.15	F(0)	0.000	NO	4.5	9,000	10,345	1.15	F(0)	0.000	NO

[a] The lane capacities are assumed to be 2,000 vph for through lanes and 1,000 vph for high-occupancy vehicle (HOV) and auxiliary lanes. HOV and auxiliary lanes are thus represented as 1/2 of a lane.
* CMP Freeway Monitoring Location.

Source: Gibson Transportation Consulting, Inc.

#4

#5 101 S. ~~South~~ Bound 101 EXCEEDS CAPACITY EVENT WITH FUNDED IMPROVEMENTS W/ PROJECT

#6 101 So.

ATTACHMENT 14

Response to Comment No. 12-400

Attachment 14 consists of a copy of page 816 from the Draft EIR, with notations added by the commenter regarding freeway segments, and is referenced in Comment No. 12-248. The commenter is referred to Response to Comment No. 12-248, above.

Comment No. 12-401

See next page

Table 43
Regional Transit Impact Analysis

	A.M. Peak Hour	P.M. Peak Hour
Project Transit Trips	1,037	1,194
Existing Capacity Surplus	2,541	2,286
Surplus with Project	1,504	1,092
Proposed Project Improvements -		
Additional Bus [a]	1	1
Seated Capacity / Bus	66	66
Percentage Available for Project patrons	25%	25%
Additional Capacity	17	17
Final Surplus with Project Improvements	1,521	1,109

[a] The Project would add one articulated bus to the Metro Rapid 750 line traveling along the Ventura Boulevard corridor.

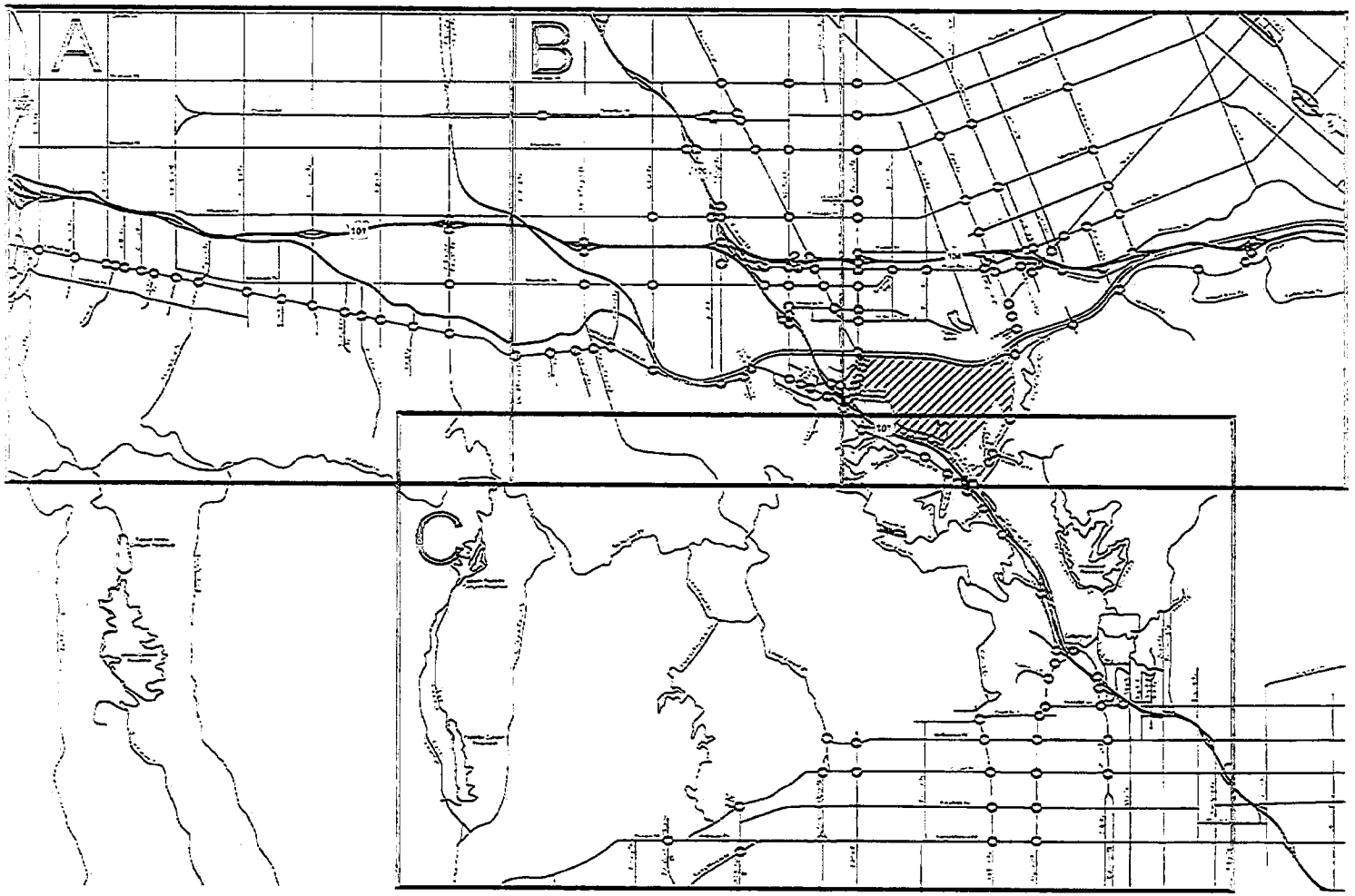
ATTACHMENT 15

Response to Comment No. 12-401

Attachment 15 consists of a copy of page 818 from the Draft EIR and is referenced in Comment No. 12-249. The commenter is referred to Response to Comment No. 12-249, above.

Comment No. 12-402

See next page



matrix environmental

Figure 42
Study Area Division

Page 819

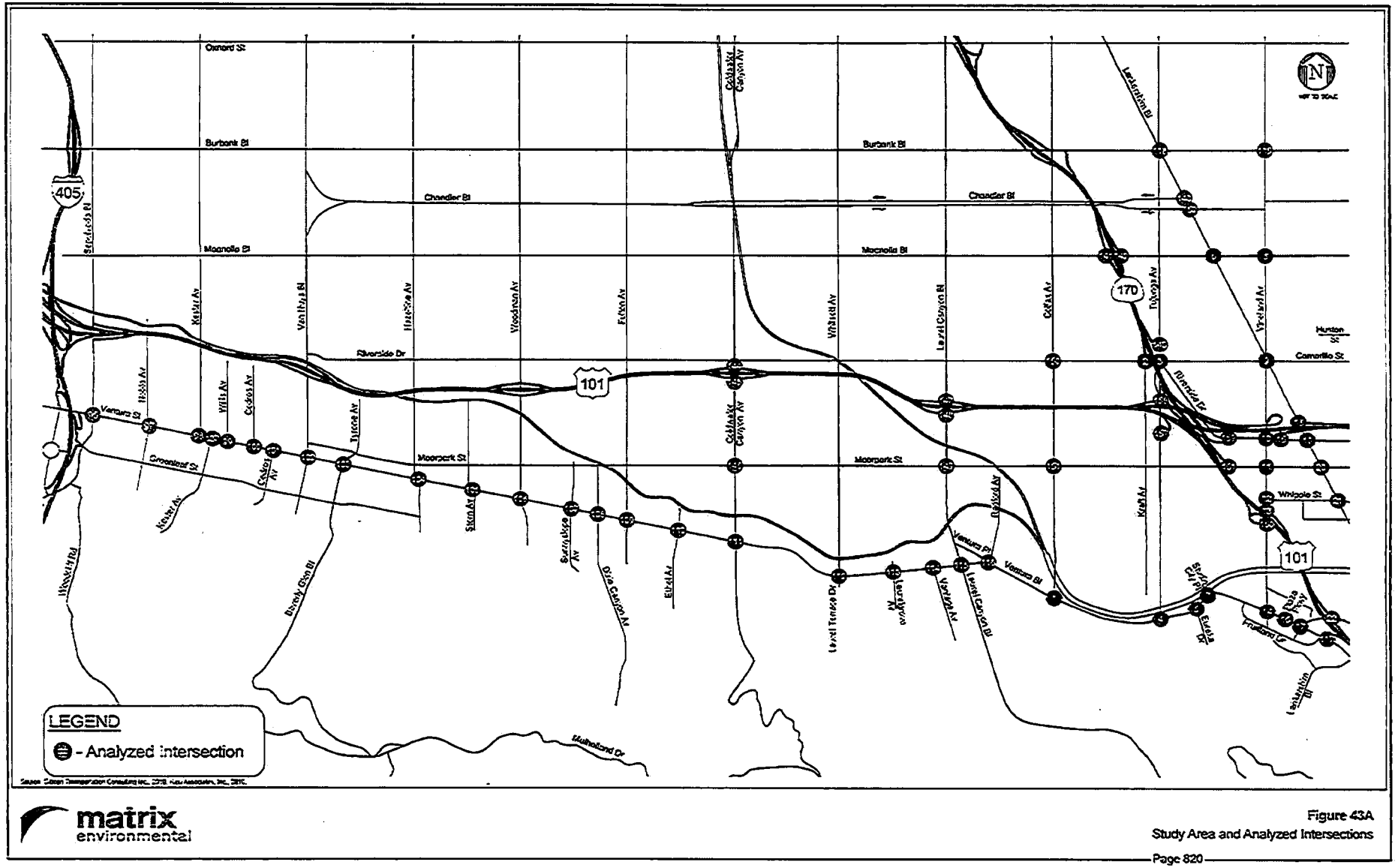
ATTACHMENT 16

Response to Comment No. 12-402

Attachment 16 consists of a copy of Figure 42, page 819, from the Draft EIR and is referenced in Comment No. 12-250. The commenter is referred to Response to Comment No. 12-250, above.

Comment No. 12-403

See next page

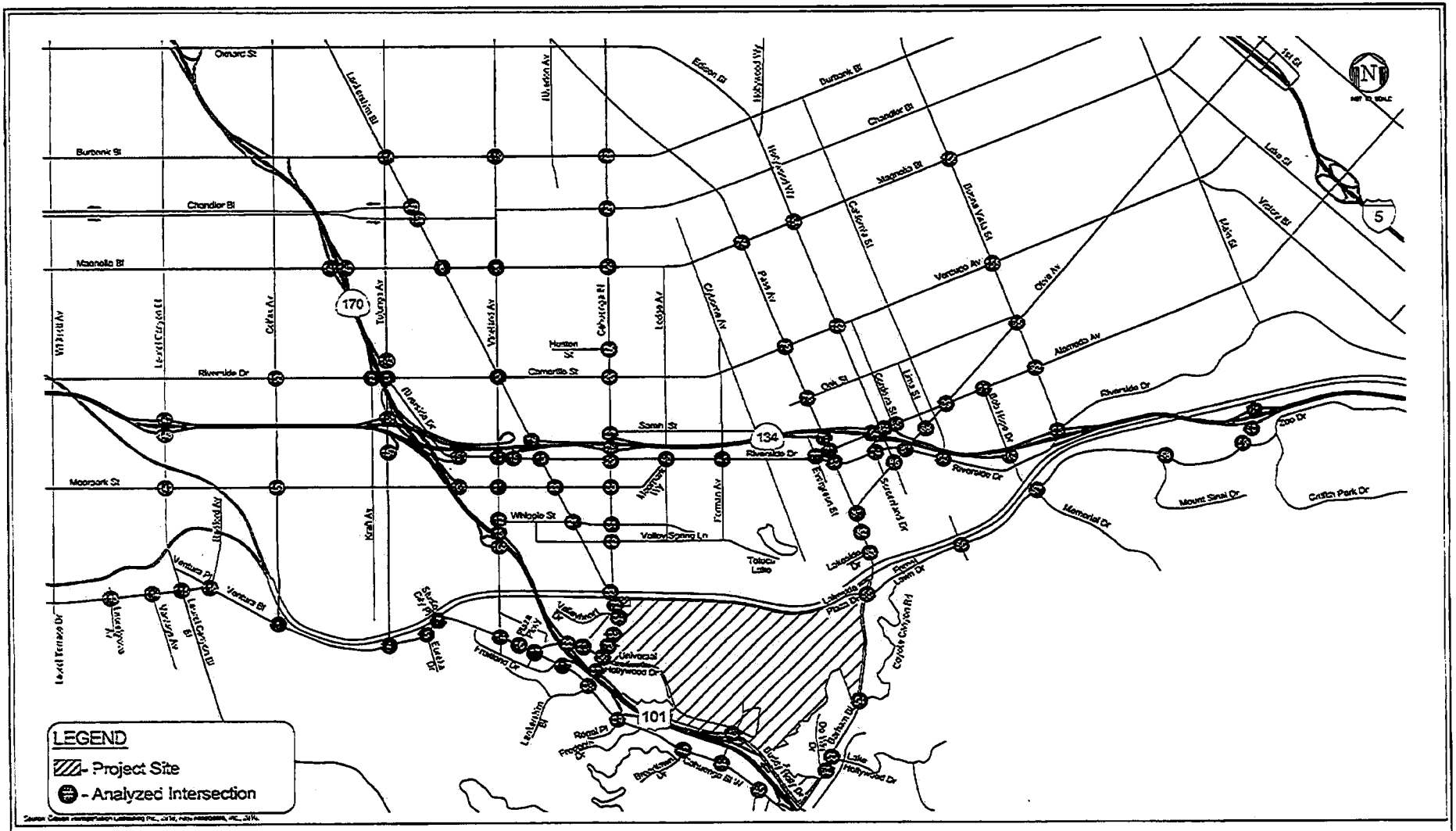


matrix environmental

Figure 43A
Study Area and Analyzed Intersections

Page 820

ATTACHMENT #17

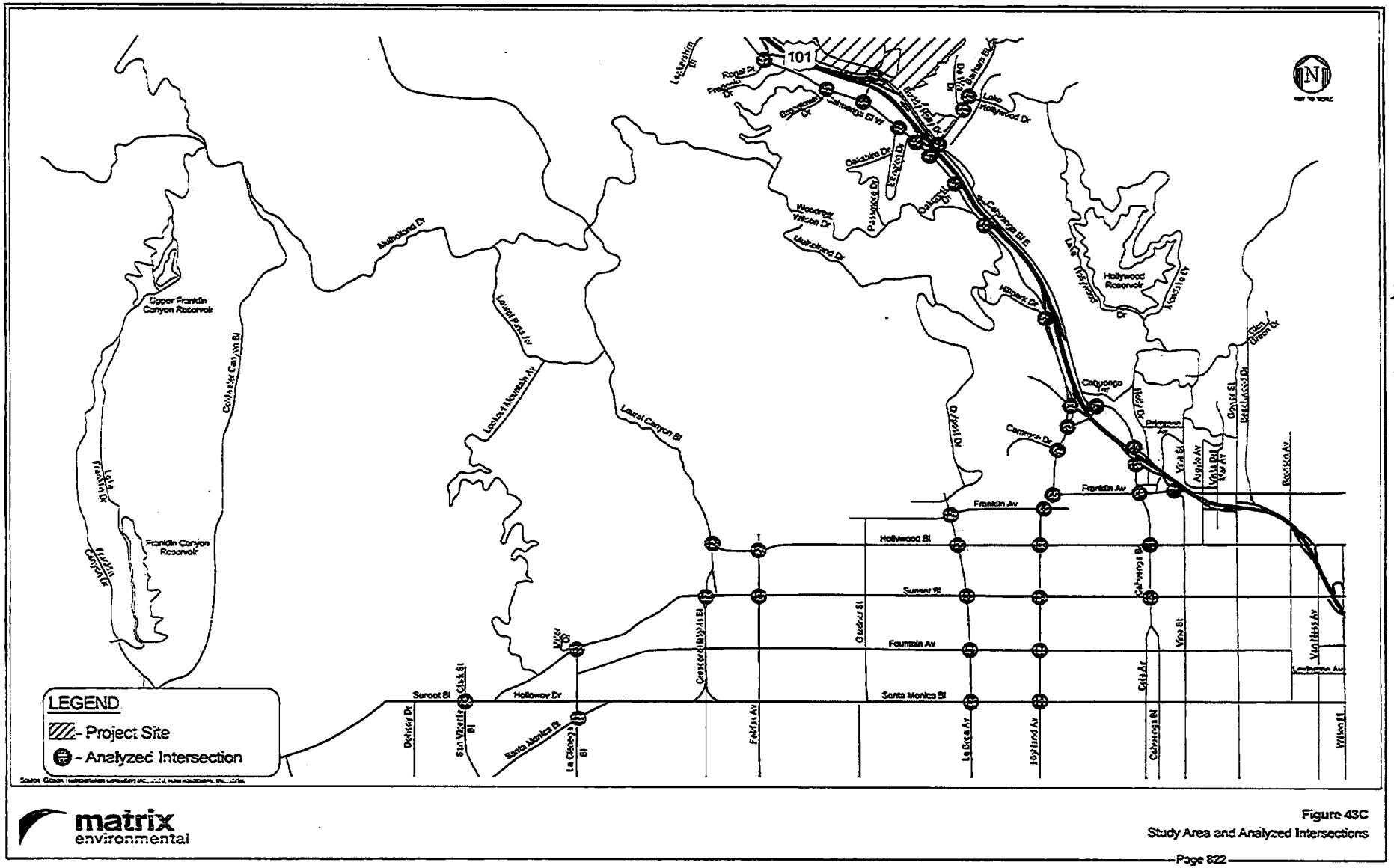


matrix environmental

Figure 4SB
Study Area and Analyzed Intersections

Page S21

ATTACHMENT 17 Pg. 2



matrix environmental

Figure 43C
Study Area and Analyzed Intersections

Page 822

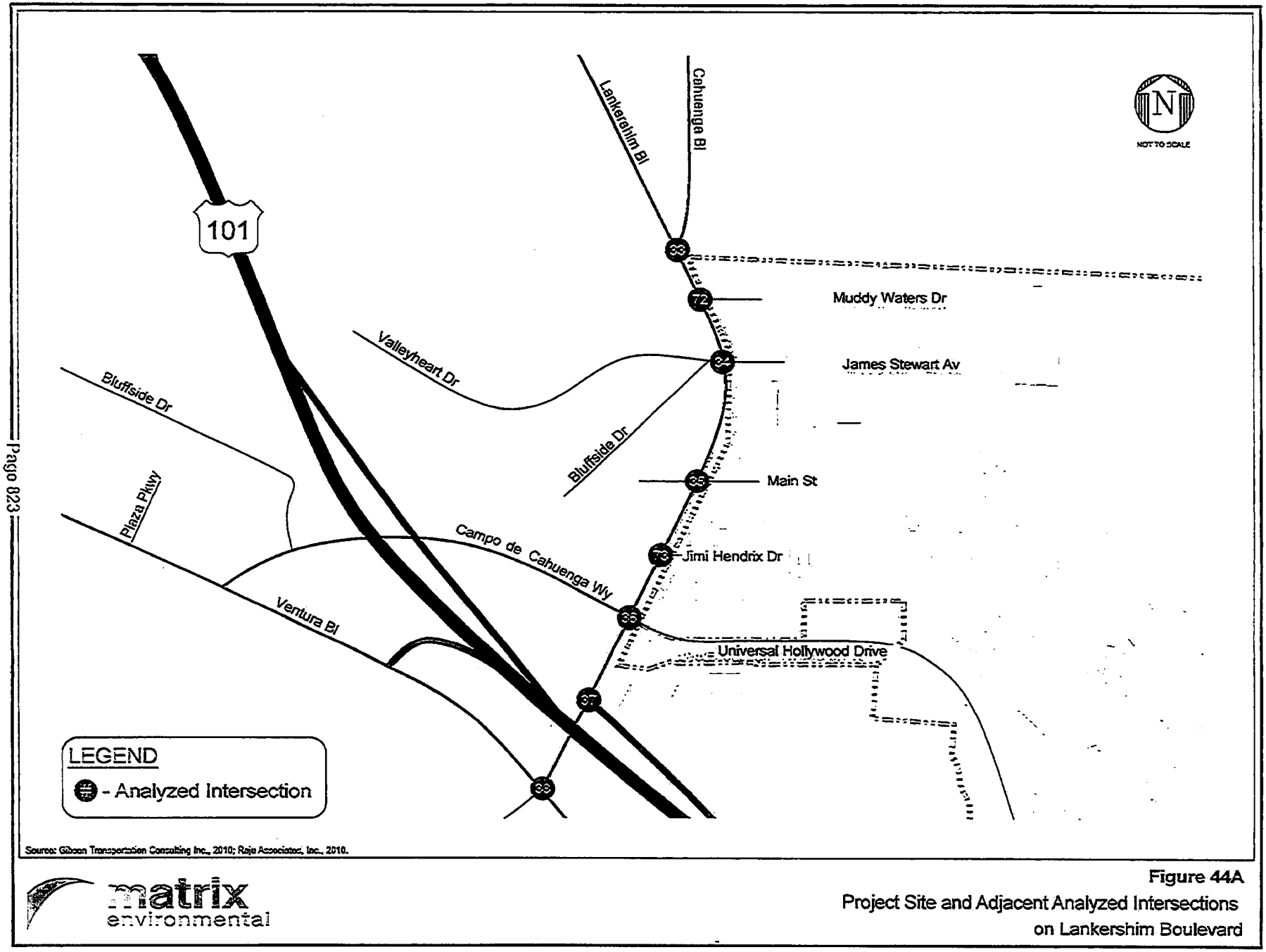
ATTACHMENT 17 463

Response to Comment No. 12-403

Attachment 17 consists of a copy of Figures 43A, 43B, and 43C, pages 820–822, from the Draft EIR and is referenced in Comment No. 12-250. The commenter is referred to Response to Comment No. 12-250, above.

Comment No. 12-404

See next page



Source: Gibson Transportation Consulting Inc., 2010; Raju Associates, Inc., 2010.

matrix environmental

Figure 44A
Project Site and Adjacent Analyzed Intersections on Lankershim Boulevard

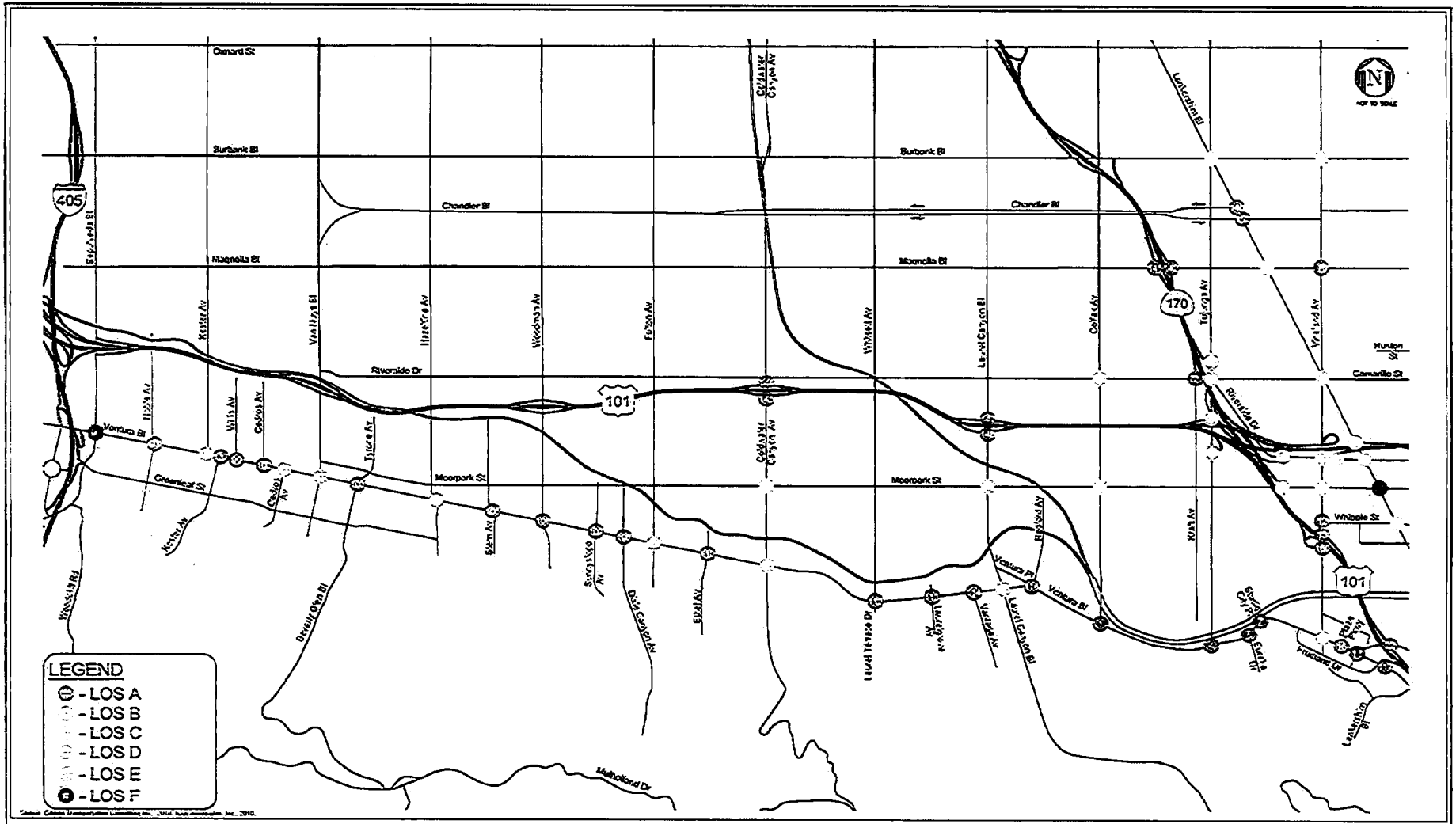
ATTACHMENT 18

Response to Comment No. 12-404

Attachment 18 consists of a copy of Figure 44A, page 823, from the Draft EIR and is referenced in Comment No. 12-250. The commenter is referred to Response to Comment No. 12-250, above.

Comment No. 12-405

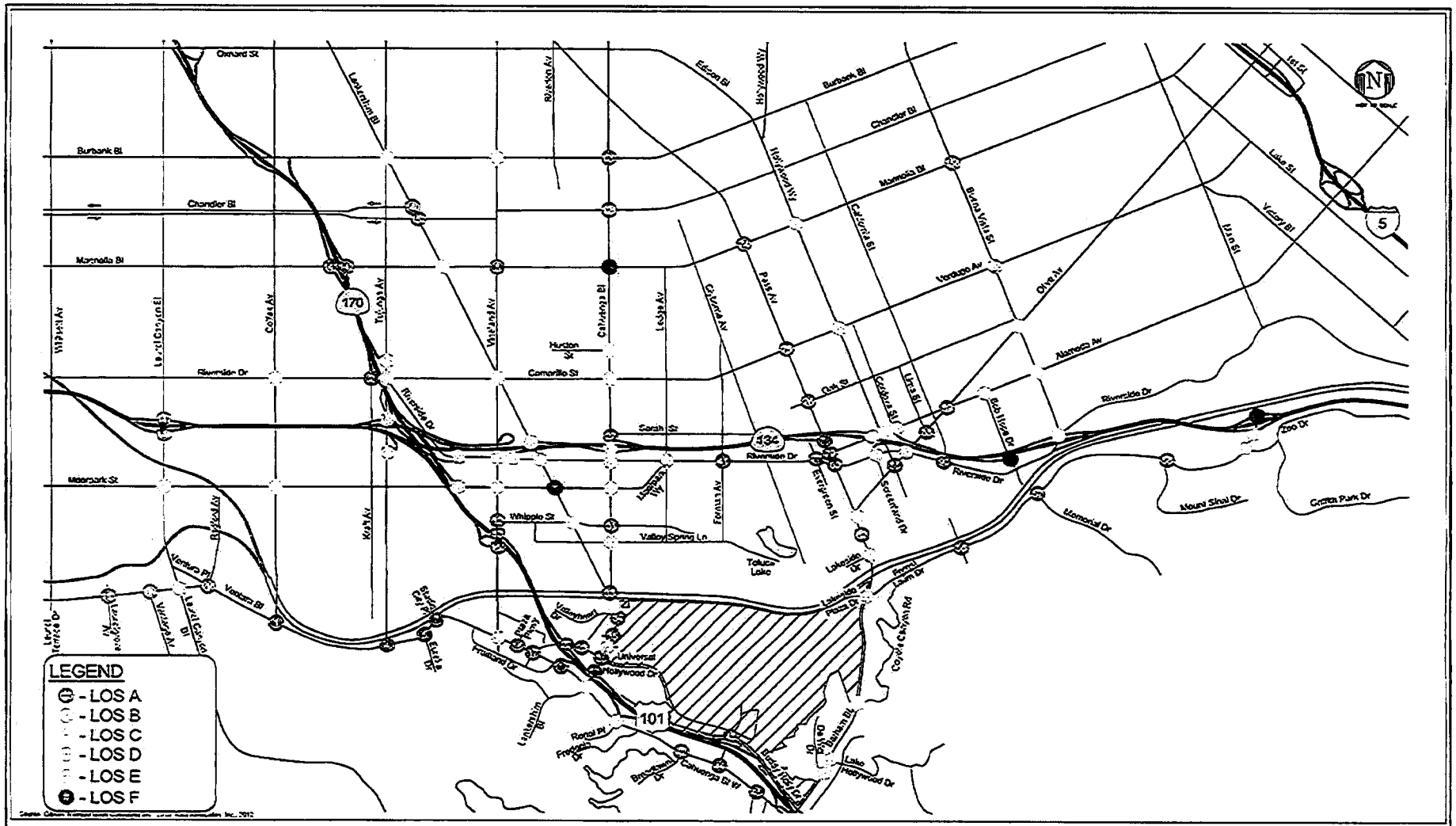
See next page

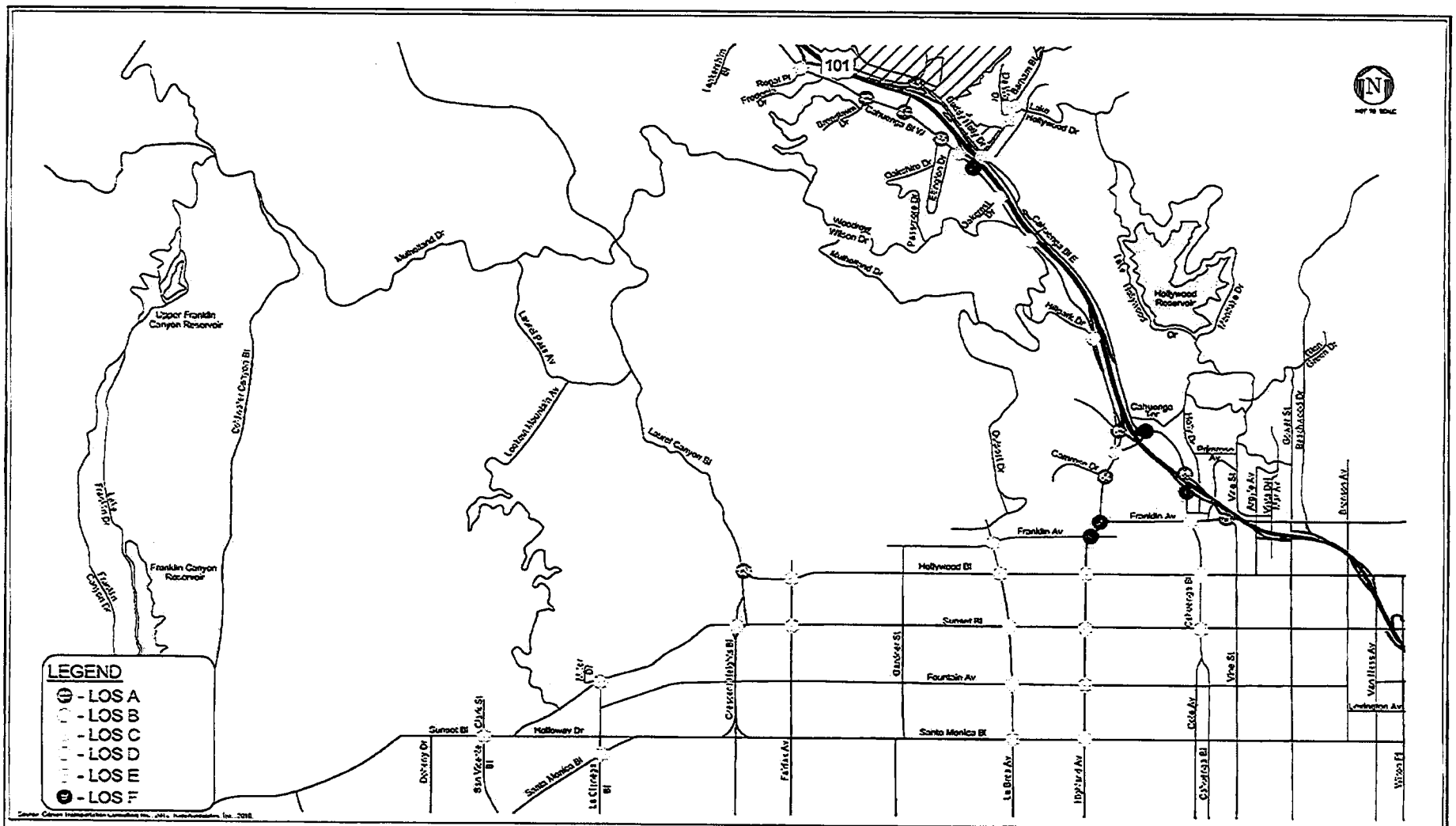


matrix environmental

Figure 46A
Existing Conditions
Intersection Level of Service - A.M. Peak Hour
Page 834

ATTACHMENT 19


LEGEND
A - LOS A
B - LOS B
C - LOS C
D - LOS D
E - LOS E
F - LOS F
Oxnard St
Burbank Bl
Chandler Bl
Magnolia Bl
Riverside Dr
Camarillo St
Whipple St
Valley Spring Ln
Moorpark St
Ventura Fl
Ventura Bl
Universal Hollywood Dr
Lankershim Bl
Rancho Pl
Franklin Dr
Barham Bl
Lake Hollywood Dr
Cahuenga Bl W
Lakeside Dr
Forest Lawn Dr
Mount Sinai Dr
Zoo Dr
Griffith Park Dr
Memorial Dr
Alameda Av
Verdugo Av
Olive Av
Glenoaks Bl
Lake St
Victory Bl
1st St
Hollywood Fwy
Ventura Fwy
Foothill Fwy
Golden State Fwy
Pasadena Fwy
Arroyo Seco Pkwy
Colorado St
Broadway
Pass Av
Cahuenga Bl
Vineland Av
Coldwater Canyon Av
Lankershim Blvd
Tujunga Av
Whitsett Av
Laurel Canyon Bl
Coyote Av
Kester Av
Balboa Blvd
Encino Pl
Sepulveda Bl
Burbank Blvd
Sherman Way
Victory Blvd
Roscoe Blvd
Nordhoff St
Devonshire St
Chatsworth St
Lassen St
Rinaldi St
Parthenia St
Saticoy St
Vanowen St
Victory Pl
Lankershim Blvd
Universal Hollywood Dr
Forest Lawn Dr
Barham Blvd
Cahuenga Blvd W
Lake Hollywood Dr
Mount Sinai Dr
Griffith Park Dr
Zoo Dr
Memorial Dr
Riverside Dr
Alameda Ave
Verdugo Ave
Olive Ave
Glenoaks Blvd
Lake St
Victory Blvd
1st St
Hollywood Fwy
Ventura Fwy
Foothill Fwy
Golden State Fwy
Pasadena Fwy
Arroyo Seco Pkwy
Colorado St
Broadway
Pass Ave
Cahuenga Blvd
Vineland Ave
Coldwater Canyon Ave
Lankershim Blvd
Tujunga Ave
Whitsett Ave
Laurel Canyon Blvd
Coyote Ave
Kester Ave
Balboa Blvd
Encino Pl
Sepulveda Blvd



matrix environmental

Figure 46C
Existing Conditions
Intersection Level of Service - A.M. Peak Hour
Page 836

ATTACHMENT 19 Pg 3

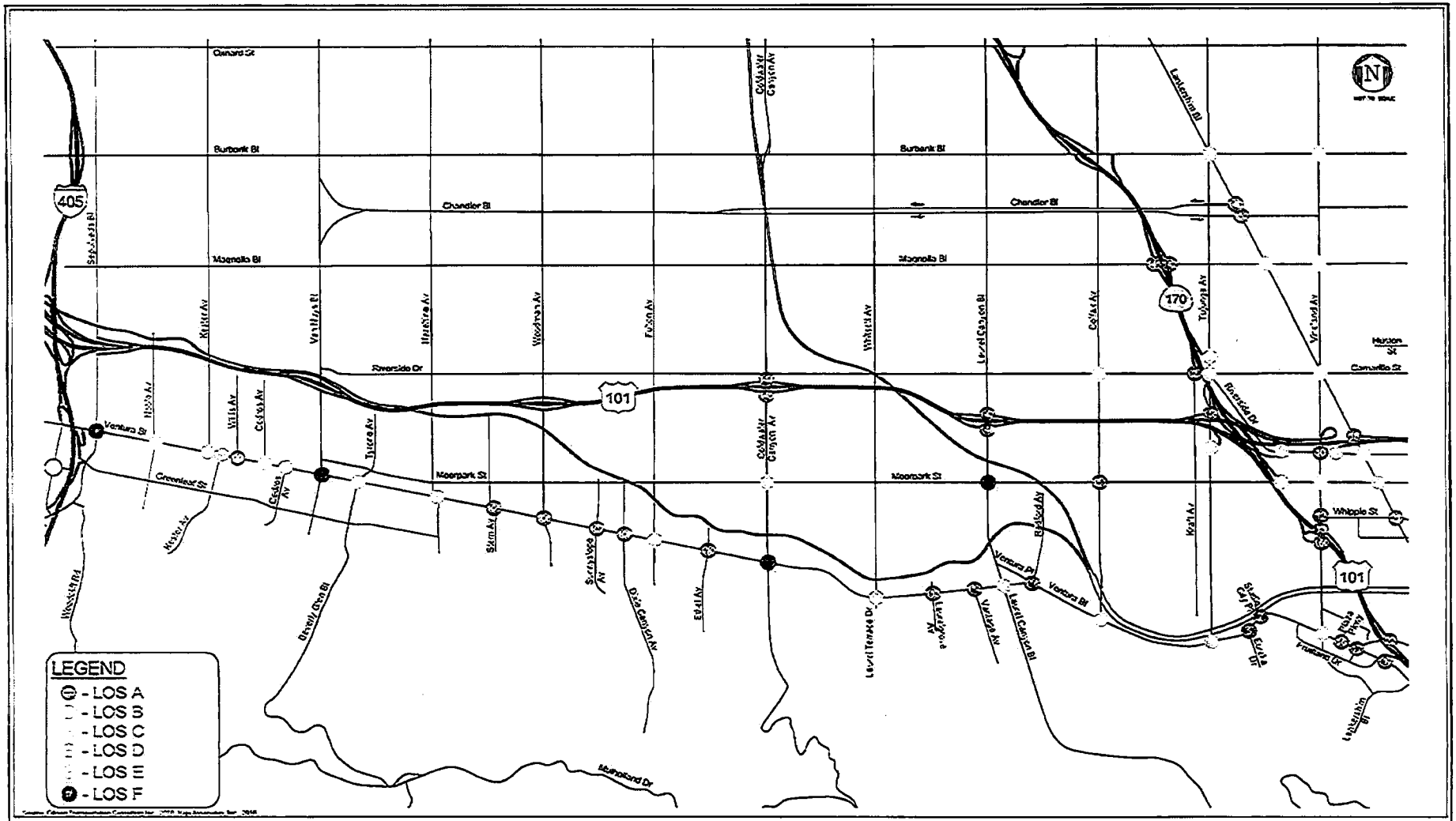
Response to Comment No. 12-405

Attachment 19 consists of a copy of Figures 46A, 46B, and 46C, pages 834–836, from the Draft EIR and is referenced in Comment No. 12-251. The commenter is referred to Response to Comment No. 12-251, above.

Comment No. 12-406

See next page

ATTACHMENT 20

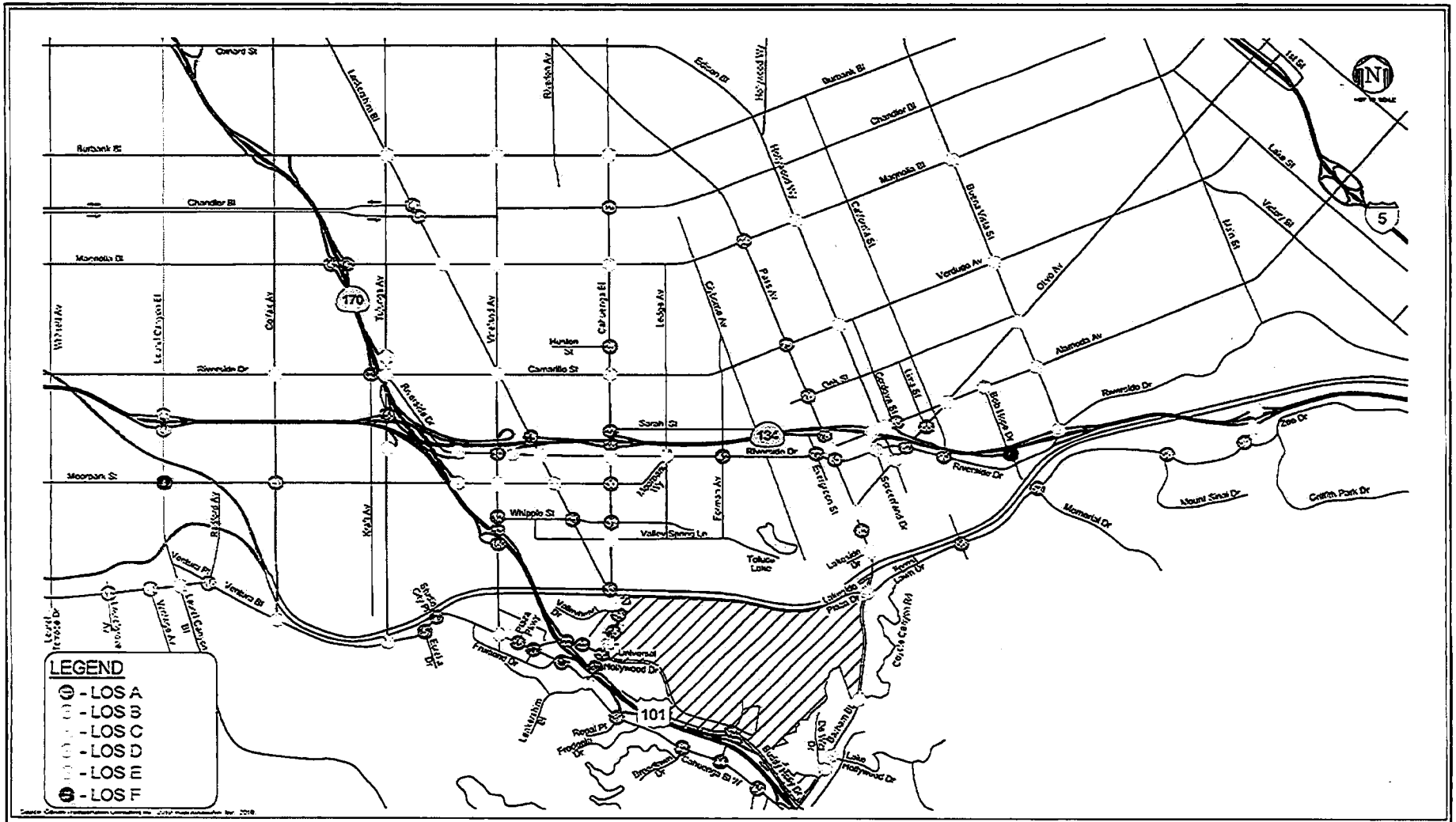


matrix environmental

Figure 47A
Existing Conditions
Intersection Level of Service - P.M. Peak Hour

Page 837

ATTACHMENT 20 Pg 2

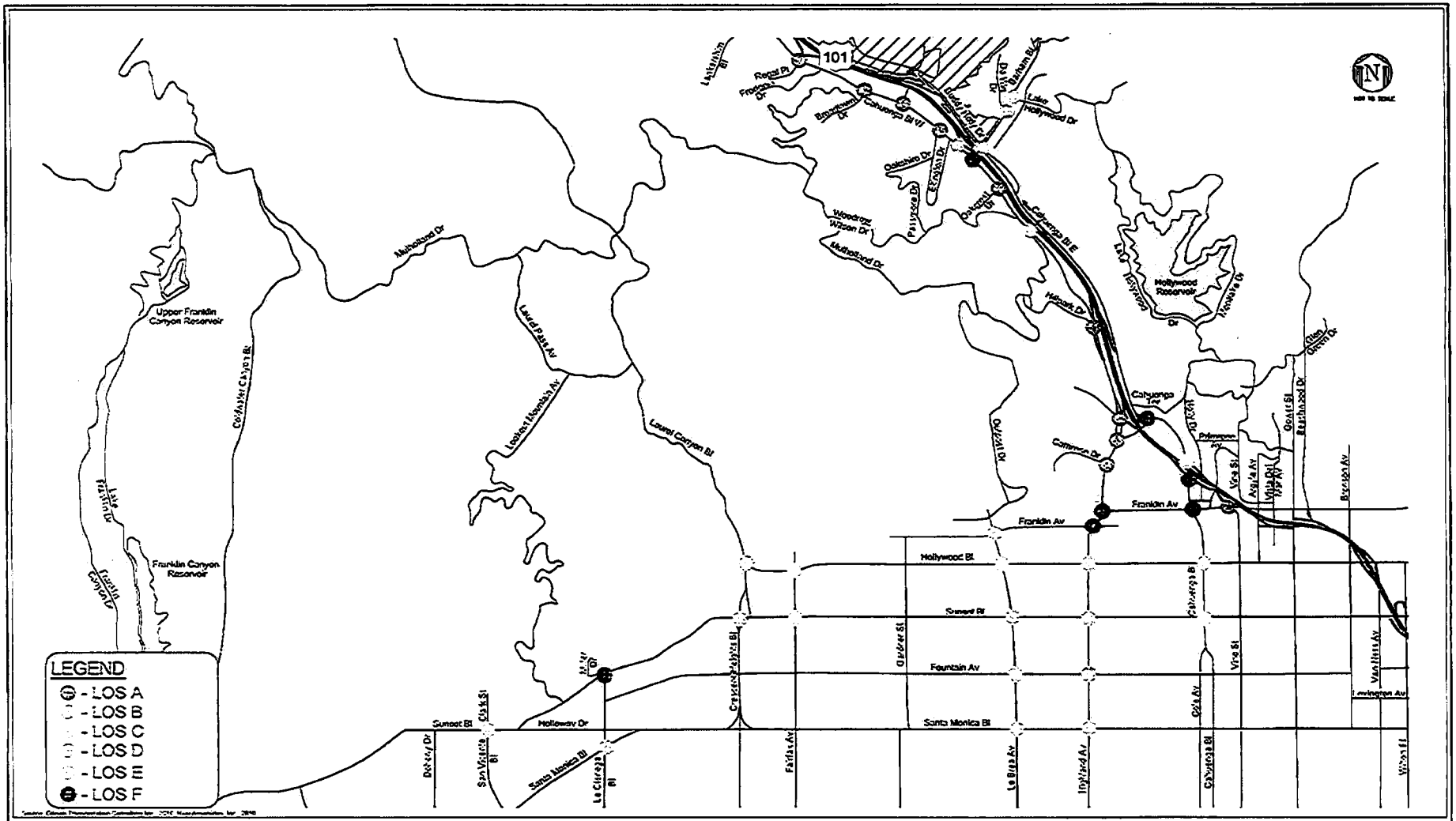


matrix environmental

Figure 47B
Existing Conditions
Intersection Level of Service - P.M. Peak Hour

Page 838

ATTACHMENT 20 Pg 3



matrix environmental

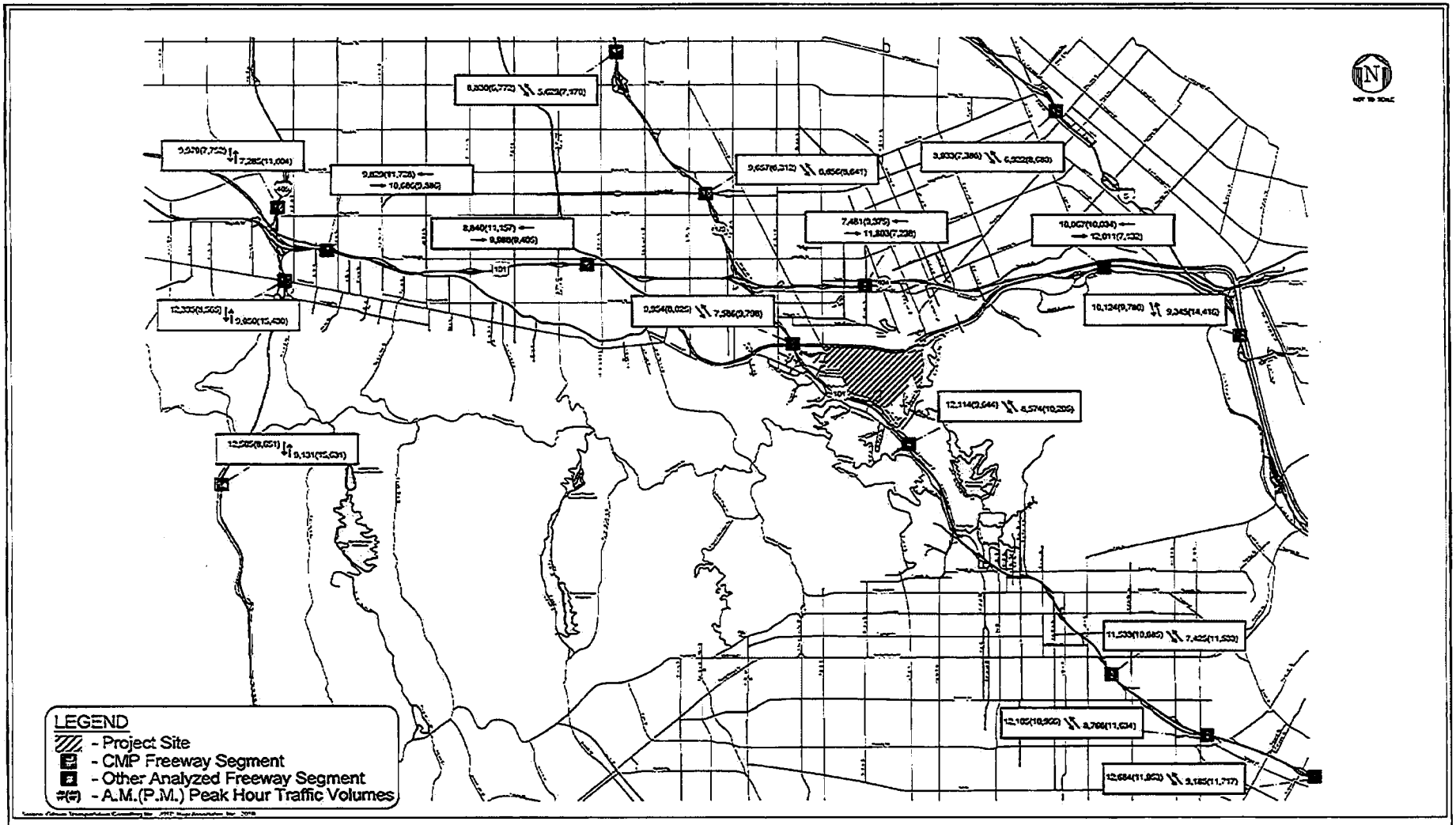
Figure 47C
Existing Conditions
Intersection Level of Service - P.M. Peak Hour
Page 339

Response to Comment No. 12-406

Attachment 20 consists of a copy of Figures 47A, 47B, and 47C, pages 837–839 from the Draft EIR and is referenced in Comment No. 12-251. The commenter is referred to Response to Comment No. 12-251, above.

Comment No. 12-407

See next page



matrix environmental

Figure 48
Existing Conditions
Freeway Segment Peak Hour Traffic Volumes

Page 840

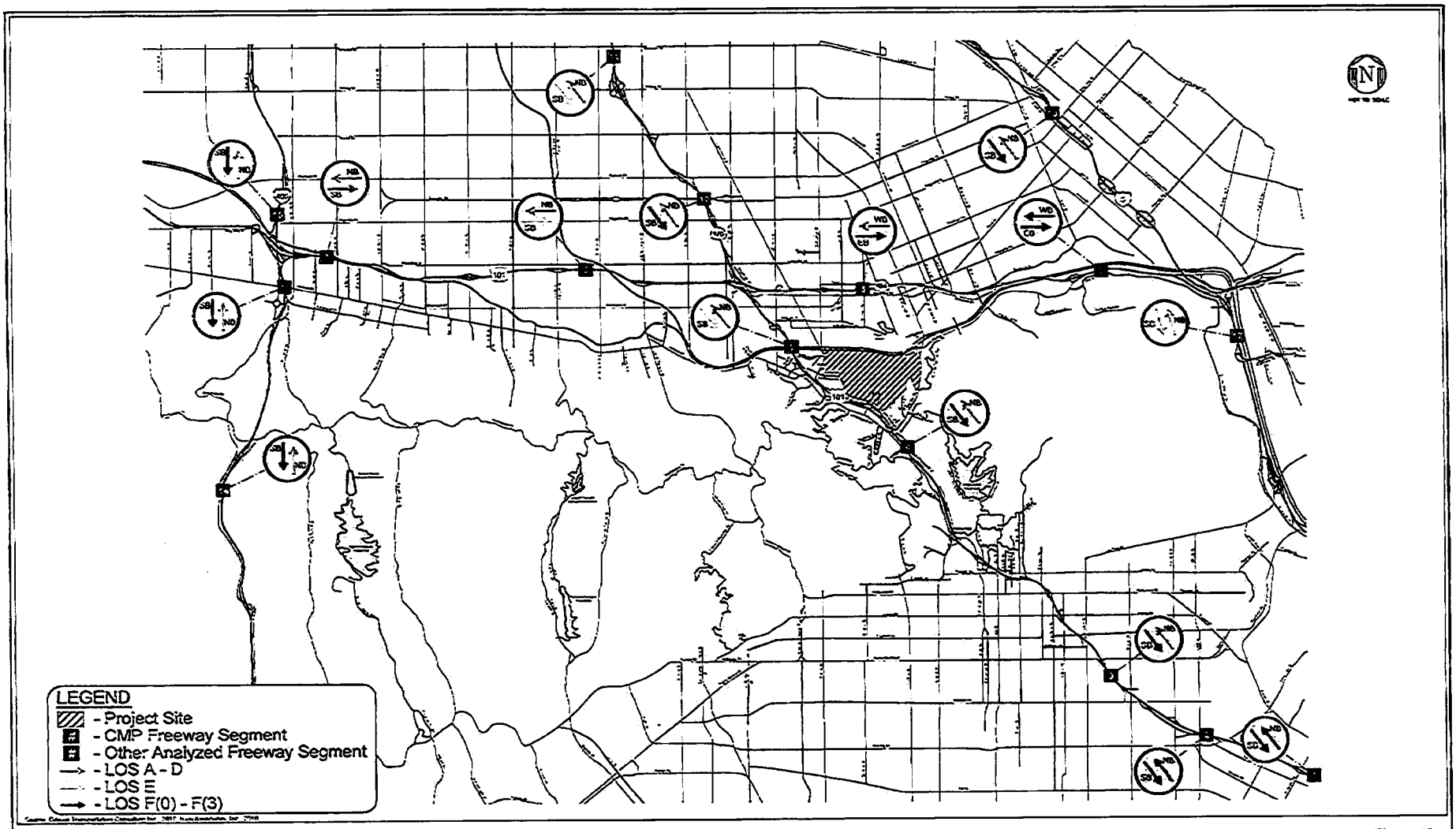
ATTACHMENT 21

Response to Comment No. 12-407

Attachment 21 consists of a copy of Figure 48, page 840, from the Draft EIR and is referenced in Comment No. 12-251. The commenter is referred to Response to Comment No. 12-251, above.

Comment No. 12-408

See next page



matrix environmental

Figure 49
Existing Conditions
Freeway Segment Level of Service - A.M. Peak Hour

Page 841

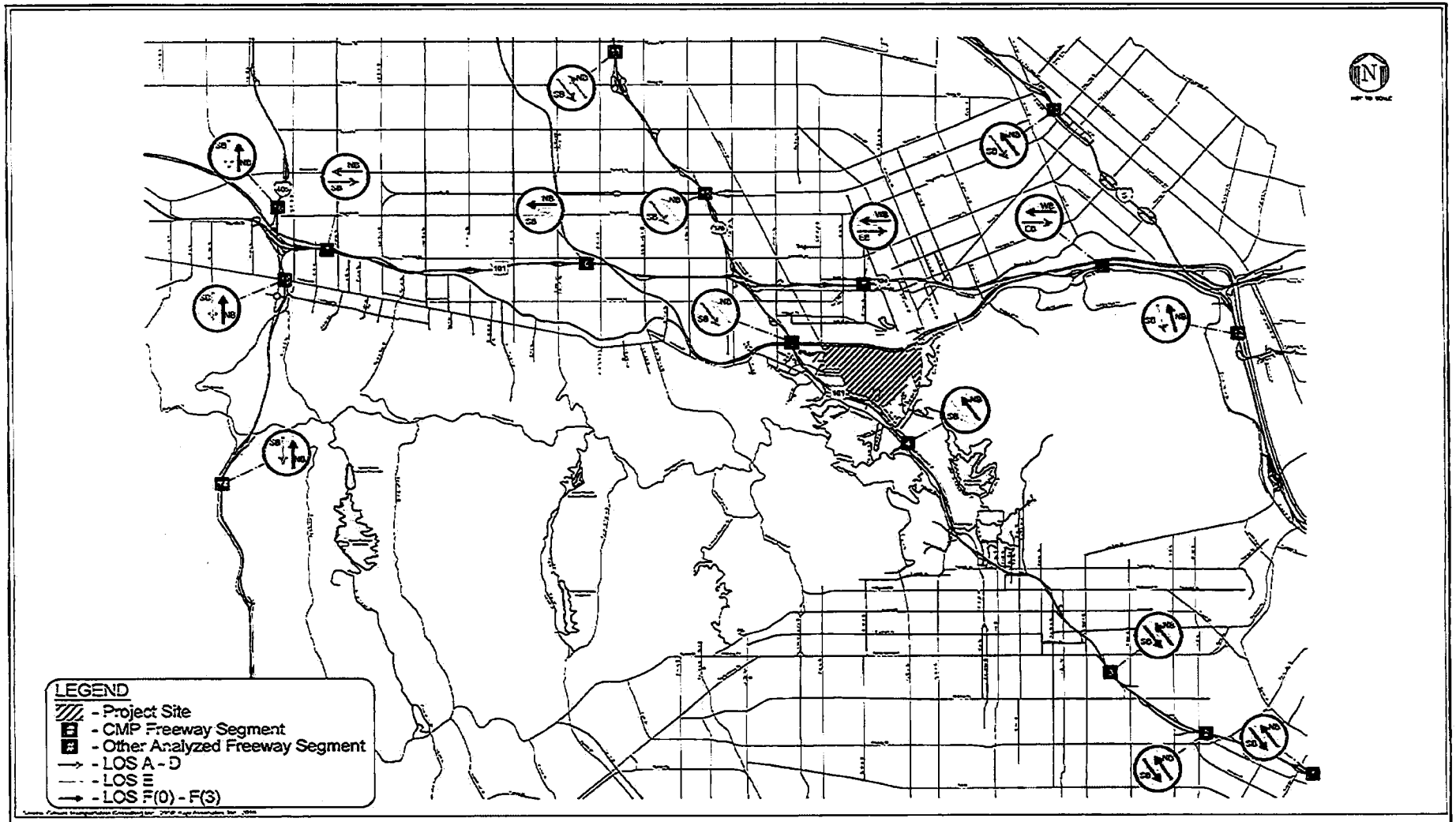
ATTACHMENT 22

Response to Comment No. 12-408

Attachment 22 consists of a copy of Figure 49, page 841, from the Draft EIR and is referenced in Comment No. 12-251. The commenter is referred to Response to Comment No. 12-251, above.

Comment No. 12-409

See next page

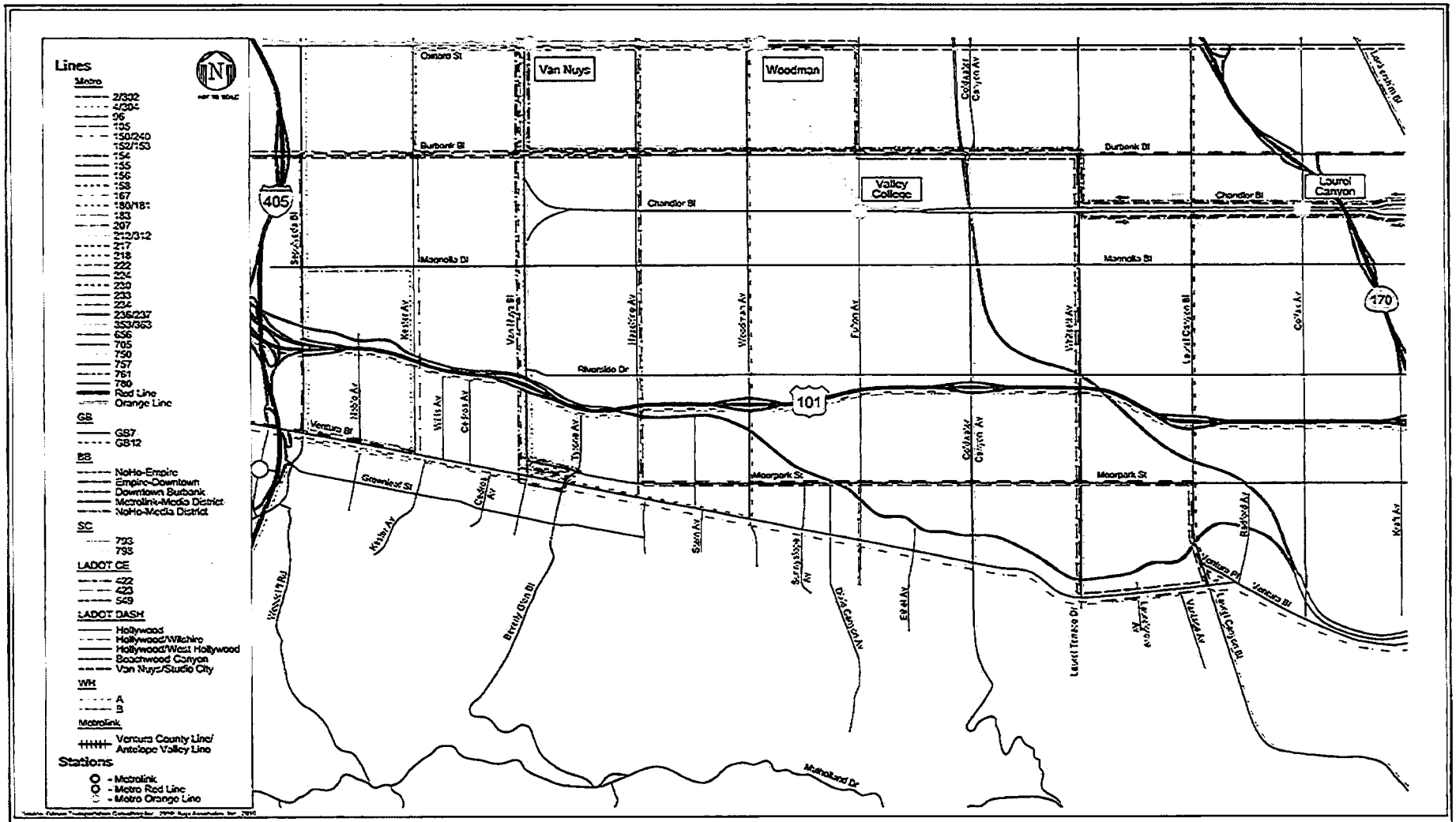


matrix environmental

Figure 50
Existing Conditions
Freeway Segment Level of Service - P.M. Peak Hour

Page 842

ATTACHMENT 13

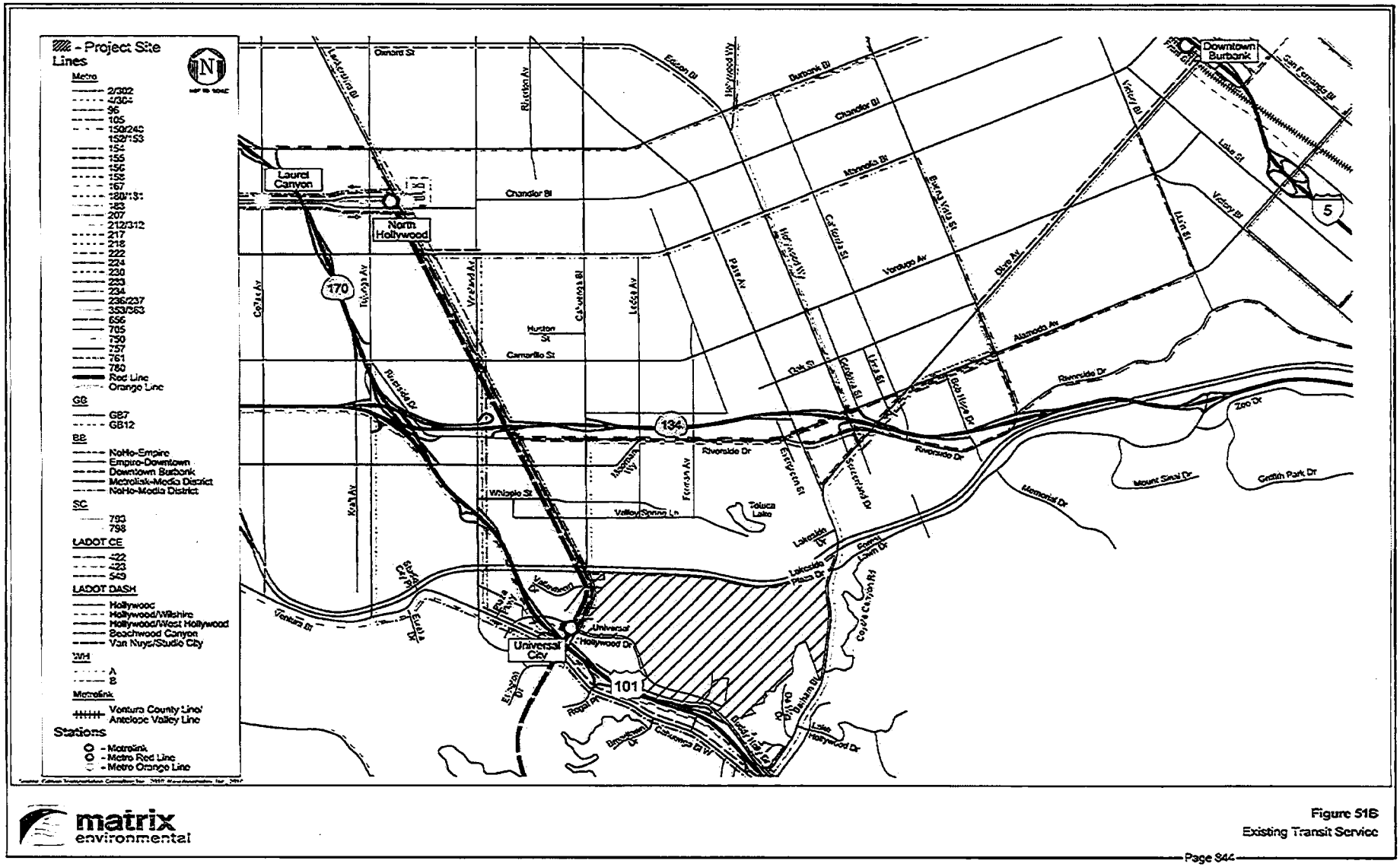


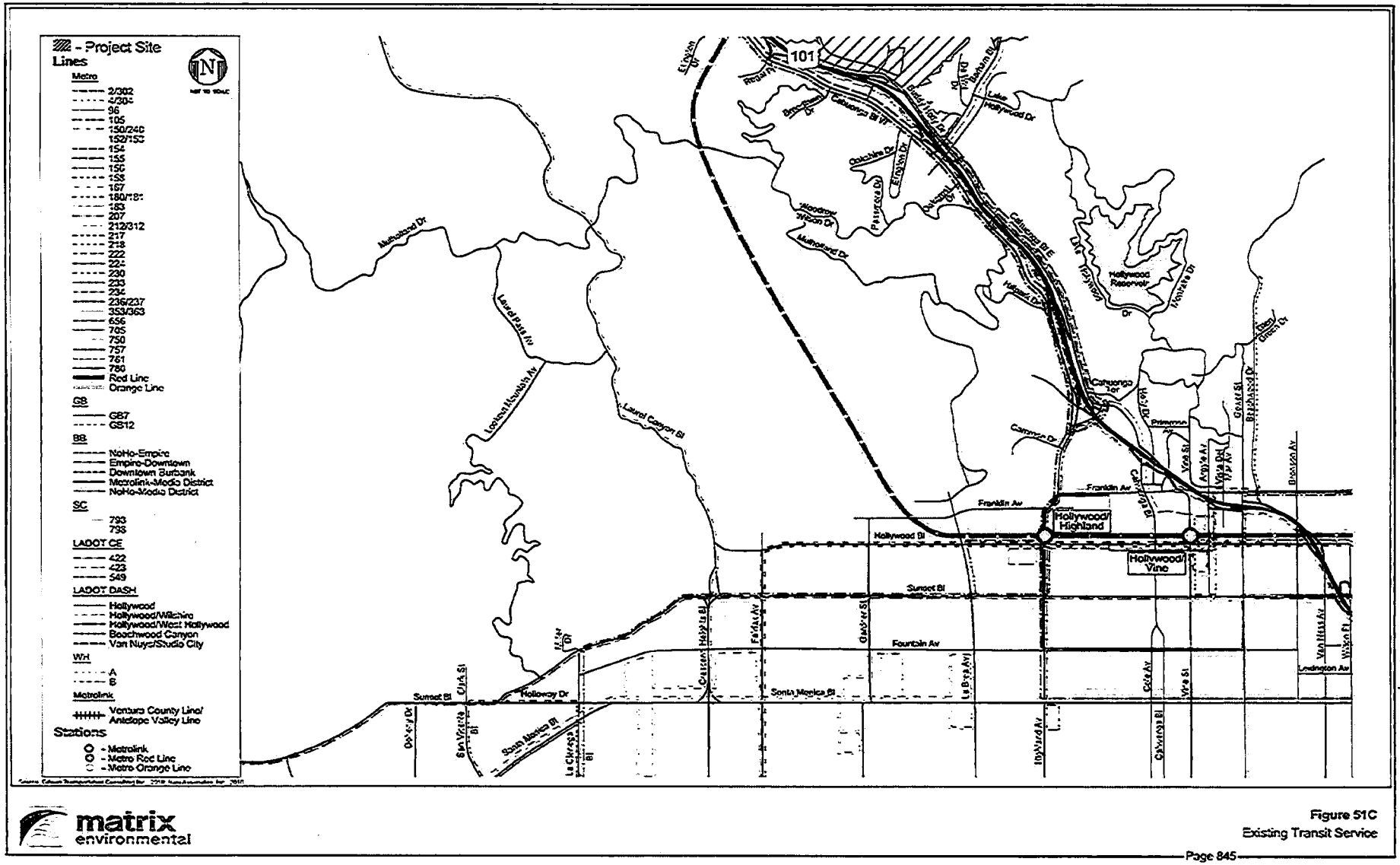
matrix environmental

Figure 51A
Existing Transit Service

Page 843

ATTACHMENT 23 Pg 2


- Project Site
Lines
Metro
2/302
4/304
96
105
150/240
152/153
154
155
156
158
167
179/181
183
207
212/312
217
218
222
224
230
233
234
236/237
353/363
656
705
750
757
761
780
Red Line
Orange Line
GB
GB7
GB12
BB
NoHo-Empire
Empire-Downtown
Downtown Burbank
Metrolink-Media District
NoHo-Media District
SC
793
798
LADOT CE
422
423
549
LADOT DASH
Hollywood
Hollywood/Wilshire
Hollywood/West Hollywood
Beachwood Canyon
Van Nuys/Studio City
WH
A
B
Metrolink
Ventura County Line
Antelope Valley Line
Stations
- Metrolink
- Metro Red Line
- Metro Orange Line
Laurel Canyon
North Hollywood
Universal City
Downtown Burbank
Chandler Bl
Burbank Bl
Victory Bl
Ventura Av
Olive Av
Alameda Av
Riverside Dr
Whipple St
Valley Spring Ln
Toluca Lake
Lakeside Dr
Lakeside Plaza Dr
Universal Hollywood Dr
Ventura Pl
Mount Sinai Dr
Griffith Park Dr
Zoo Dr
Memorial Dr
Lake Hollywood Dr
Cahuenga Blvd W
Broadway Ter
Royal Pl
Evanda Dr
Elvyden Dr
Camarillo St
Huston St
Clark St
Oxnard St
Lankershim Bl
Riverside Dr
Mountain Hy
Forman Av
Coldwater Canyon Av
Laurel Canyon Bl
Vineland Av
Tujunga Av
Cahuenga Bl W
Hollywood Fwy
Barham Bl
Forest Lawn Dr
Ferrara Dr
Cahuenga Pass
Universal Terrace Pkwy
Universal Center Dr
Universal Studios Blvd
Universal Hollywood Dr
Lankershim Bl
Edison Bl
Chandler Bl
Victory Bl
Lake St
Glenoaks Bl
Verdugo Av
Olive Av
Alameda Av
Riverside Dr
Zoo Dr
Griffith Park Dr
Mount Sinai Dr
Memorial Dr
Lakeside Plaza Dr
Lake Hollywood Dr
Cahuenga Blvd W
Broadway Ter
Royal Pl
Evanda Dr
Elvyden Dr
Camarillo St
Huston St
Clark St
Oxnard St
Riverside Dr
Whipple St
Valley Spring Ln
Toluca Lake
Lakeside Dr
Lakeside Plaza Dr
Universal Hollywood Dr
Ventura Pl
Mount Sinai Dr
Griffith Park Dr
Zoo Dr
Memorial

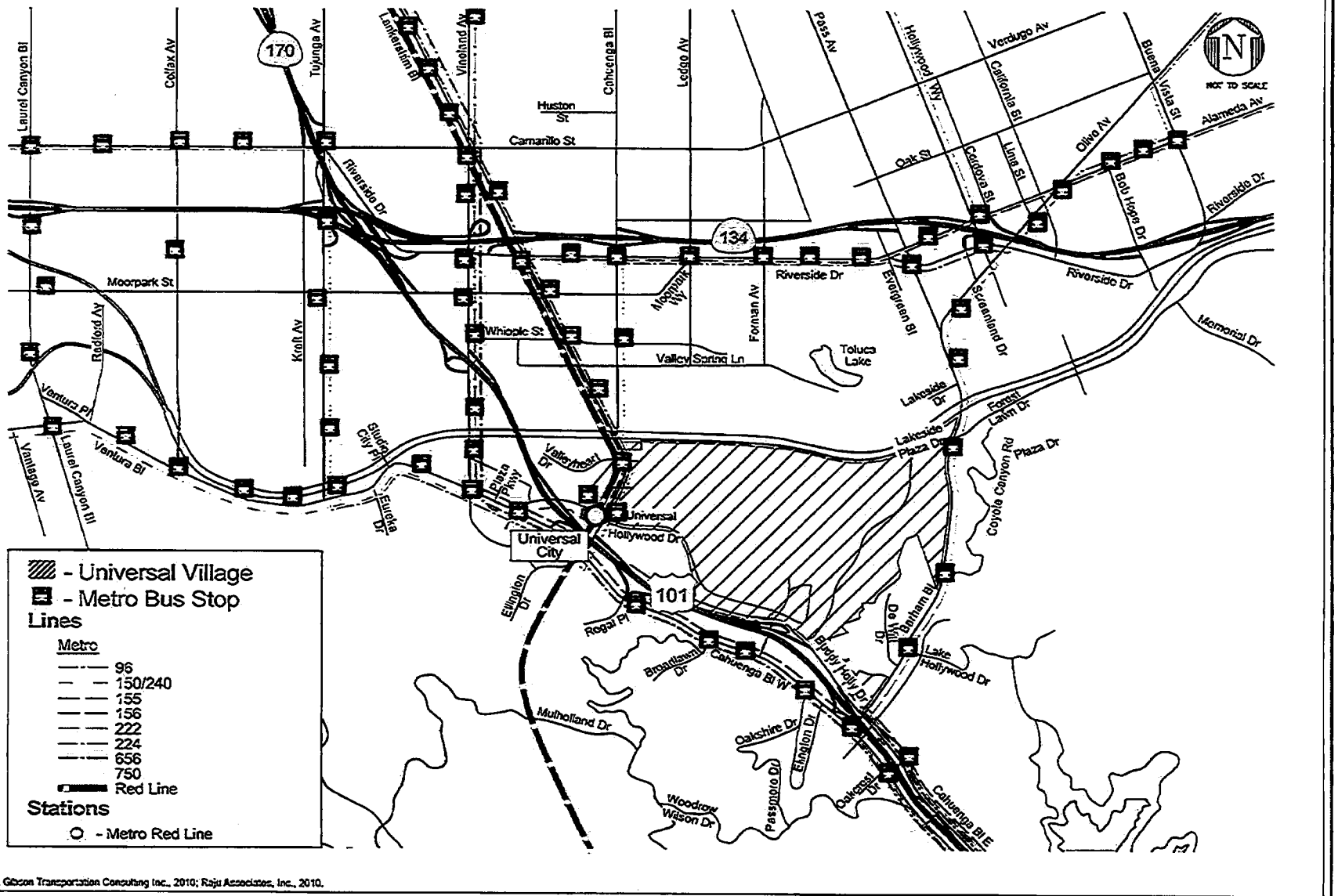


matrix environmental

Figure 51C
Existing Transit Service

Page 845

ATTACHMENT 23 Pg 4



Source: Gibson Transportation Consulting Inc., 2010; Raju Associates, Inc., 2010.

matrix environmental

Figure 51D
Existing Transit Lines Serving The Project Site

Page 846

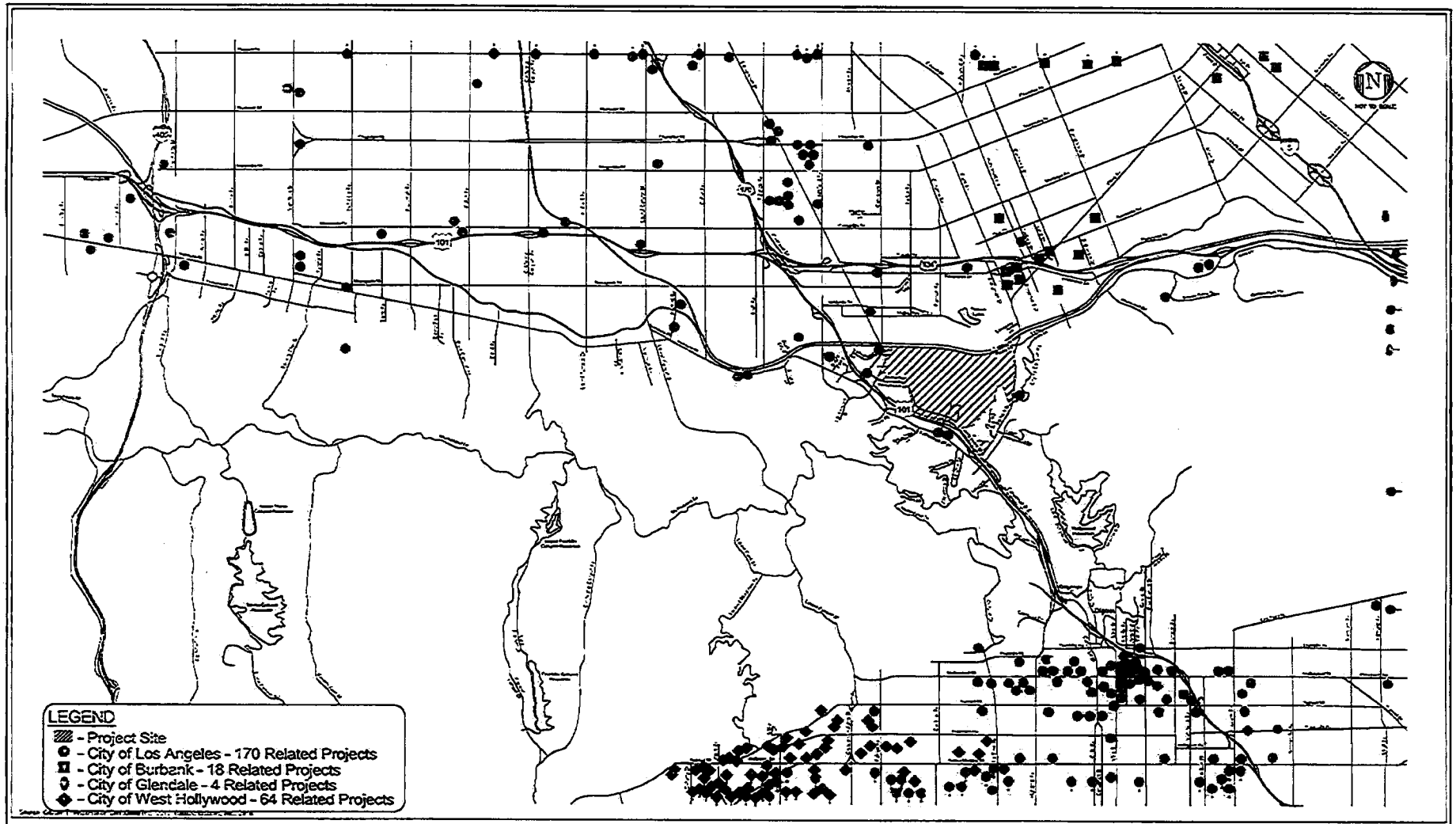
Attachment 23 Pg 5

Response to Comment No. 12-409

Attachment 23 consists of a copy of Figures 50, 51A, 51B, 51C, and 51D, pages 842–846, from the Draft EIR and is referenced in Comment No. 12-251. The commenter is referred to Response to Comment No. 12-251, above.

Comment No. 12-410

See next page



matrix environmental

Figure 52
Location of Related Projects

Page 847

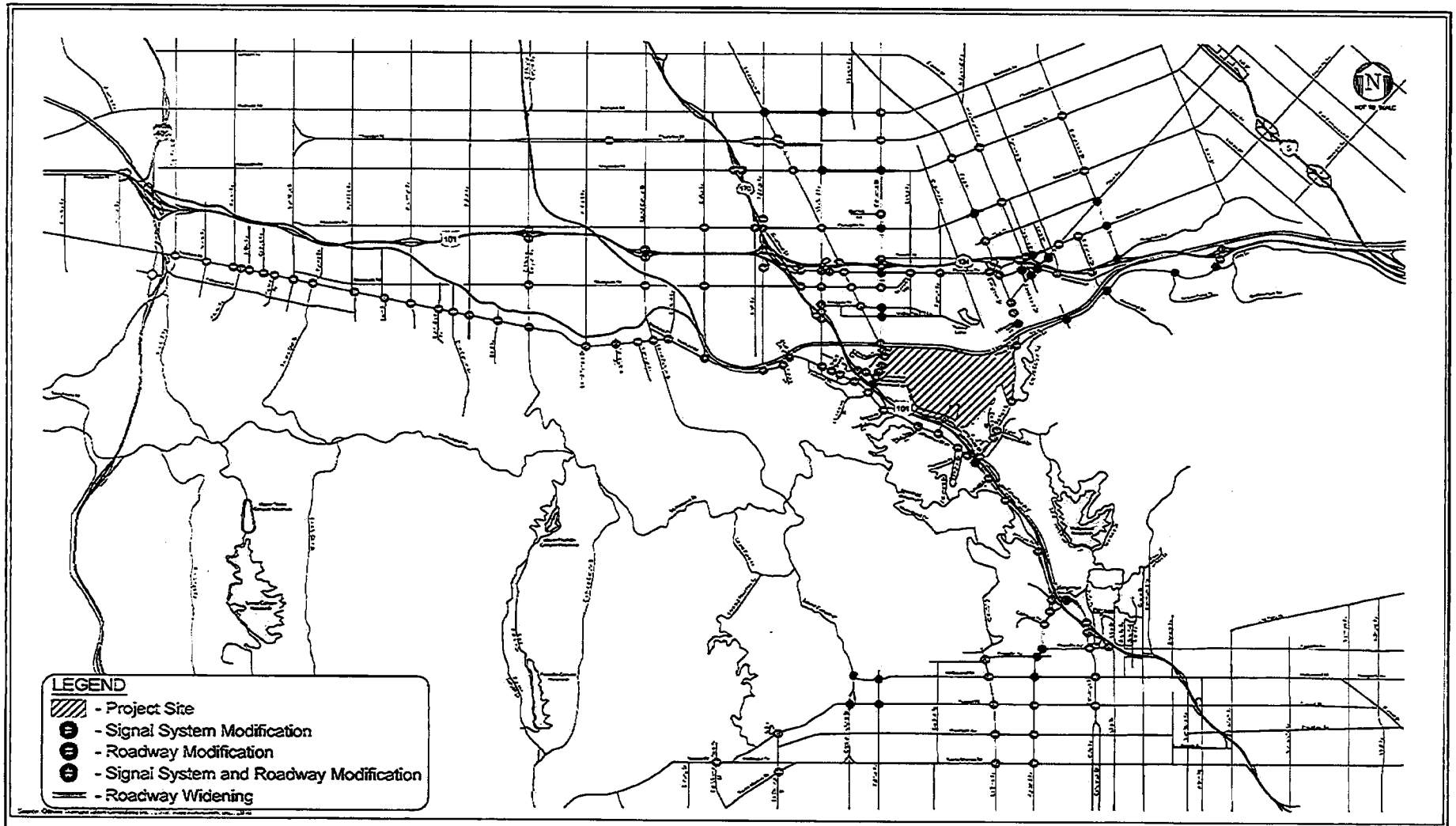
ATTACHMENT 24

Response to Comment No. 12-410

Attachment 24 consists of a copy of Figure 52, page 847, from the Draft EIR and is referenced in Comment No. 12-252. The commenter is referred to Response to Comment No. 12-252, above.

Comment No. 12-411

See next page



matrix environmental

Figure 53
Future Base Roadway Improvements (Year 2030)

Page 848

ATTACHMENT 25

Google maps

Paper East/West Road Along LA River Shown on this map in PINK

ATTACHMENT 25A


Toluca Lake
Toluca Lake
Lakeside Golf Club
Lakeside Dr
Forest Lawn Dr
James Stewart Ave
Universal City
Universal Studios Hollywood
Universal City
Universal Hollywood Dr
Hilton Los Angeles/ Universal City
Universal City Walk
Hard Rock Cafe
Barham Blvd
Buddy Holly Dr
Hollywood Fwy
Cahuenga Blvd W
Coral Dr
Blair Dr
Primera Ave
Lake Hollywood Dr
Lindo St
Tareco Dr
Oak Glen Dr
Oakley Dr
Bonnie Hill Dr
Oakshire Dr
Ellington Dr
Bennett Dr
Dos Palos Dr
Cadet Ct
Hollycrest Dr
Wonder View Dr
Woodrow Wilson Dr
Lake Hollywood Dr
Sombra Dr
Troy Dr
Craig Dr
Toy Dr
Hilldale Dr
Canyon Dr
Cahuenga Blvd
Whipple St
Woodbridge St
Strohm Ave
Arcola Ave
Toluca Estates Dr
Valley Spring Ln
Clybourn Ave
Warner Blvd
S Valley St
S Rose St
Hood Ave
W Olive Ave
Lankershim Blvd
N Cahuenga Blvd
Freedonia Dr
Mulholland Dr
Broadview Dr
Multiview Dr
Floyce Dr
Passage Dr
Adina Dr
Carse Dr
Cadet Ct
Hollywood Fwy
Primera Ave
Bonita St
N Knoll Dr
Wonder View Dr
Lake Hollywood Dr
Troy Dr
Blair Dr
Charleston Way
Troy Dr
Barham Blvd
Primera Ave
Sombra Dr
Lake Hollywood Dr
Lindo St
Tareco Dr
Wonder View Dr
Lake Hollywood Dr
Hilldale Dr
Craig Dr
Toy Dr
Canyon Dr
S Canyon Dr
N Canyon Dr
Blair Dr
Troy Dr
Craig Dr
Toy Dr
Barham Blvd
Terrace
Primera Ave
Sombra Dr
Lake Hollywood Dr
Lindo St
Wonder View Dr
Lake Hollywood Dr
Tareco Dr
Primera Ave
Bonita St
N Knoll Dr
Hollycrest Dr
Wonder View Dr
Woodrow Wilson Dr
Cadet Ct
Carse Dr
Ellington Dr
Bennett Dr
Dos Palos Dr
Oakshire Dr
Passage Dr
Adina Dr
Bonnie Hill Dr
Oakley Dr
Oak Glen Dr
Broadview Dr
Multiview Dr
Floyce Dr
Freedonia Dr
Mulholland Dr
Cahuenga Blvd W
Hollywood Fwy
Buddy Holly Dr
Coral Dr
Cahuenga Blvd
Universal Hollywood Dr
Universal City
Universal Studios Hollywood
Universal City Walk
Hilton Los Angeles/ Universal City
Hard Rock Cafe
James Stewart Ave
Lankershim Blvd
Forest Lawn Dr
Lakeside Golf Club
Lakeside Dr
Toluca Lake
Toluca Lake Ave
Clybourn Ave
Warner Blvd
S Valley St
S Rose St
Hood Ave
W Olive Ave
Valley Spring Ln
Toluca Estates Dr
Strohm Ave
Arcola Ave
Whipple St
Woodbridge St
Cahuenga Blvd
Barham Blvd
N Canyon Dr
S Canyon Dr
Canyon Dr
Hilldale Dr
Craig Dr
Toy Dr
Blair Dr
Troy Dr
Barham Blvd
Primera Ave
Sombra Dr
Lake Hollywood Dr
Lindo St
Tareco Dr
Wonder View Dr
Lake Hollywood Dr

ATTACHMENT 25 B
ENLARGEMENT OF THIS MAP SHOWS THE EAST/WEST ROAD ALONG THE RIVER
IS PLANNED BY THE HIGHWAY DEPARTMENT IN 1980. THE ANALYSIS WANTS TO
REMOVE THIS REQUIREMENT

Response to Comment No. 12-411

Attachments 25, 25A, and 25B consist of a copy of Figure 53, page 848, from the Draft EIR, a Google map of the Project vicinity, and a copy of the County Highway Policy Map from the 1980 County General Plan, with a notation added by the commenter regarding the East-West Road, which are referenced in Comment Nos. 12-253 and 12-254. The commenter is referred to Response to Comment Nos. 12-253 and 12-254, above.

Comment No. 12-412

See next page

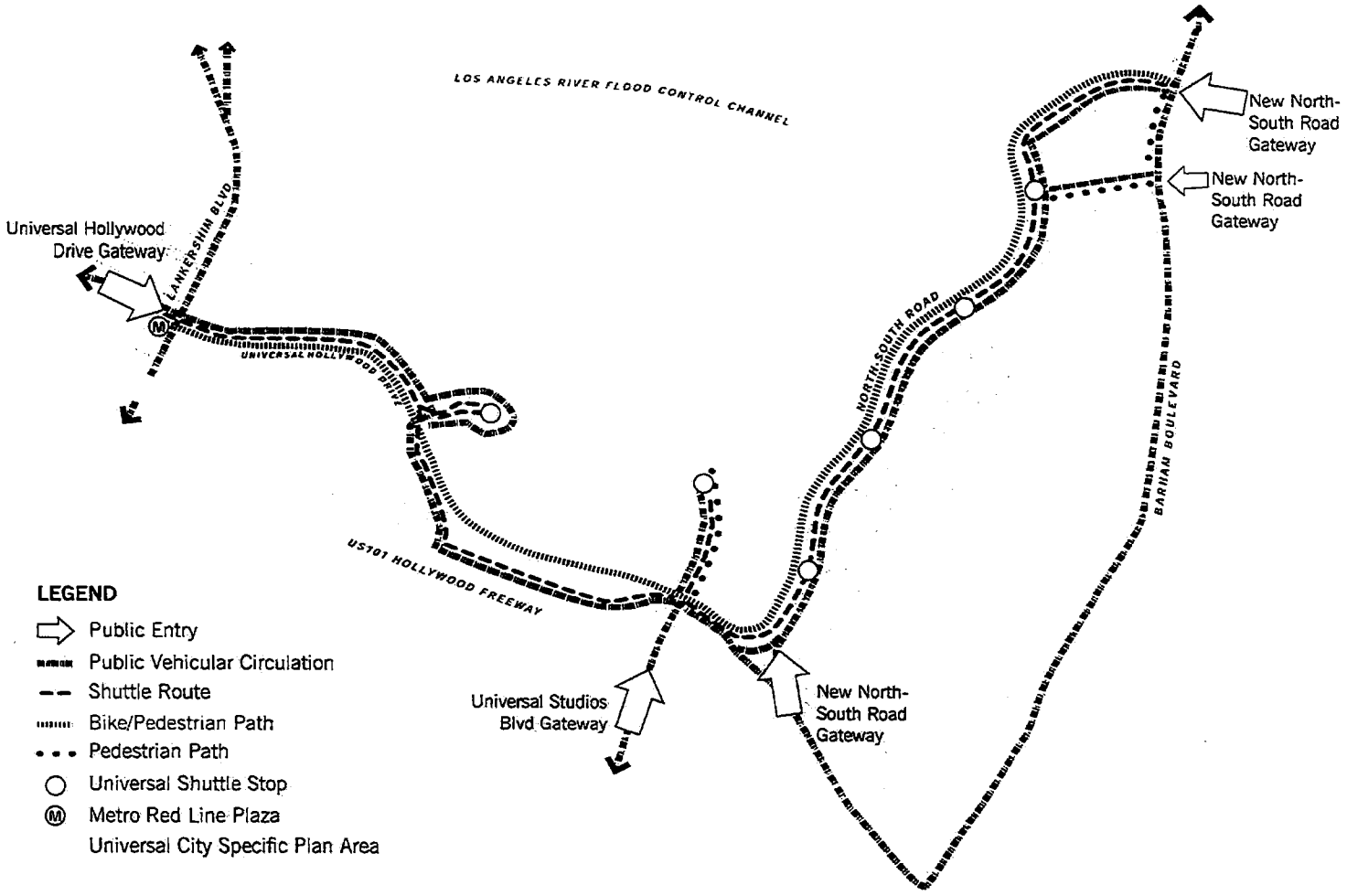


EXHIBIT No. 6 - UNIVERSAL CITY SPECIFIC PLAN CONCEPTUAL CIRCULATION PLAN

DRAFT - October 15, 2010

Page 44 of 85

ATTACHMENT #6

ADDITIONAL BIKE PATH SHOULD BE PROVIDE ALONG THE RIVER CONNECTING THE NORTH SOUTH ROAD TO LANKERSHIM

Response to Comment No. 12-412

Attachment 26 consists of a copy of Exhibit 6 from the proposed City Specific Plan with a notation added by the commenter that an additional bike path should be provided along the Los Angeles River Flood Control Channel connecting the proposed North-South Road to Lankershim Boulevard and is referenced in Comment No. 12-262. The commenter is referred to Response to Comment No. 12-262, above.

Comment No. 12-413

See next page

ATTACHMENT F-1
NBC UNIVERSAL EVOLUTION PLAN
PROJECT IMPACT SUMMARY - LEVEL OF SERVICE (SIGNALIZED INTERSECTIONS)

Intersection		Peak Hour	2006 Existing		2030 Base		2030 with Project with TDM				2030 with Project with TDM and Funded Improvements		
			V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	Change in V/C	Significant Impact?	V/C or Delay	LOS	Impact Remain ?
CITY OF LOS ANGELES													
BARHAM BL	@ BUDDY HOLLY DR/CAHUENGA BL	[a] A.M.	-	E	1.109	F	1.115	F	0.006	NO	1.101	F	NO
		P.M.	-	E	1.220	F	1.410	F	0.030	YES	1.054	F	NO
BARHAM BL	@ CAHUENGA BL	A.M.	1.140	F	1.072	F	1.121	F	0.049	YES	1.076	F	NO
		P.M.	1.047	F	1.356	F	1.381	F	0.025	YES	1.312	F	NO
BARHAM BL	@ COYOTE CNY RD	A.M.	0.745	C	1.049	F	1.055	F	0.006	NO	1.042	F	NO
		P.M.	0.608	B	0.927	E	0.929	E	0.002	NO	0.902	E	NO
BARHAM BL	@ DE WITT DR	A.M.	0.813	D	1.028	F	1.033	F	0.005	NO	1.022	F	NO
		P.M.	0.693	B	1.005	F	1.010	F	0.005	NO	0.922	E	NO
BARHAM BL	@ LAKE HOLLYWOOD DR	A.M.	0.820	D	1.168	F	1.174	F	0.006	NO	1.161	F	NO
		P.M.	0.826	D	1.093	F	1.117	F	0.024	YES	1.101	F	NO
BARHAM BL	@ LAKESIDE PLAZA DR/FOREST LAWN DR	A.M.	0.973	E	1.352	F	1.477	F	0.125	YES	1.241	F	NO
		P.M.	0.880	D	1.204	F	1.287	F	0.083	YES	1.132	F	NO
BROADLAWN DR	@ CAHUENGA BL	A.M.	0.457	A	0.661	B	0.705	C	0.044	YES	0.675	B	NO
		P.M.	0.307	A	0.447	A	0.512	A	0.065	NO	0.455	A	NO
CAHUENGA BL	@ BURBANK BL	A.M.	0.587	A	1.169	F	1.174	F	0.005	NO	1.147	F	NO
		P.M.	0.649	B	1.080	F	1.084	F	0.004	NO	1.074	F	NO
CAHUENGA BL	@ CAMARILLO ST	A.M.	0.989	E	1.489	F	1.506	F	0.017	YES	1.472	F	NO
		P.M.	0.649	B	1.278	F	1.282	F	0.004	NO	1.235	F	NO
CAHUENGA BL	@ CHANDLER BL	A.M.	0.293	A	0.471	A	0.475	A	0.004	NO	0.453	A	NO
		P.M.	0.478	A	0.700	C	0.713	C	0.007	NO	0.697	B	NO
CAHUENGA BL	@ FRANKLIN AV	A.M.	0.739	C	0.875	D	0.879	D	0.004	NO	0.865	D	NO
		P.M.	1.170	F	1.325	F	1.334	F	0.009	NO	1.324	F	NO
CAHUENGA BL	@ HILLPARK DR	A.M.	0.659	B	0.869	D	0.913	E	0.044	YES	0.840	D	NO
		P.M.	0.521	A	0.725	C	0.751	C	0.026	NO	0.685	B	NO
CAHUENGA BL	@ HOLLYWOOD BL	A.M.	0.764	C	0.925	E	0.931	E	0.006	NO	0.901	E	NO
		P.M.	0.661	B	0.825	D	0.834	D	0.009	NO	0.834	D	NO
CAHUENGA BL	@ HUSTON ST	A.M.	0.712	C	0.940	E	0.954	E	0.014	YES	0.921	E	NO
		P.M.	0.463	A	0.549	A	0.553	A	0.004	NO	0.477	A	NO
CAHUENGA BL	@ MAGNOLIA BL	A.M.	1.141	F	1.828	F	1.843	F	0.015	YES	1.806	F	NO
		P.M.	0.903	E	1.403	F	1.406	F	0.003	NO	1.323	F	NO
CAHUENGA BL	@ MOORPARK ST	A.M.	0.624	B	1.047	F	1.123	F	0.076	YES	1.036	F	YES
		P.M.	0.576	A	1.117	F	1.185	F	0.068	YES	1.175	F	YES
CAHUENGA BL/HIGHLAND AV	@ PAT MOORE WAY/US 101 ON-RAMPS	A.M.	0.519	A	0.738	C	0.767	C	0.029	NO	0.726	C	NO
		P.M.	0.463	A	0.616	B	0.643	B	0.027	NO	0.602	B	NO
CAHUENGA BL	@ RIVERSIDE DR	A.M.	0.671	B	1.156	F	1.211	F	0.055	YES	[illegible]		YES
		P.M.	0.741	C	1.291	F	1.365	F	0.074	YES	1.157		YES
CAHUENGA BL	@ SR 134 EB RAMPS	A.M.	0.666	B	0.924	E	0.946	E	0.022	YES	0.918	B	NO
		P.M.	0.550	A	0.969	E	1.036	F	0.067	YES	0.760	C	NO
CAHUENGA BL	@ SR 134 WB OFF-RAMP	A.M.	0.465	A	0.702	C	0.780	C	0.078	YES	0.741	C	NO
		P.M.	0.408	A	0.555	A	0.568	A	0.013	NO	0.521	A	NO
CAHUENGA BL	@ SUNSET BL	A.M.	0.802	D	0.907	E	0.909	E	0.002	NO	0.899	D	NO
		P.M.	0.706	C	0.814	D	0.822	D	0.008	NO	0.812	D	NO
CAHUENGA BL	@ US 101 NB OFF-RAMP	A.M.	0.425	A	0.652	B	0.662	B	0.010	NO	0.567	A	NO
		P.M.	0.754	C	1.071	F	1.101	F	0.030	YES	1.001	F	NO

[a] LOS based on field observations; the project incremental impact was calculated using the travel demand simulation model developed for this project.
* Indicates oversaturated conditions. Delay cannot be calculated.

UN MITIGATABLE IMPACT

ATTACHMENT 27
Pg 1

ATTACHMENT F-1
NBC UNIVERSAL EVOLUTION PLAN
PROJECT IMPACT SUMMARY - LEVEL OF SERVICE (SIGNALIZED INTERSECTIONS)

Intersection		Peak Hour	2006 Existing		2030 Base		2030 with Project with TDM				2030 with Project with TDM and Funded Improvements		
			V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	Change in V/C	Significant Impact?	V/C or Delay	LOS	Impact Remain ?
CAHUENGA BL	@ WHIPPLE ST	A.M.	0.382	A	0.658	B	0.717	C	0.059	YES	0.625	B	NO
		P.M.	0.251	A	0.622	B	0.760	C	0.008	YES	0.727	C	NO
CEDROS AV (EAST)	@ VENTURA BL	A.M.	0.805	D	1.078	F	1.093	F	0.015	YES	1.054	F	NO
		P.M.	0.699	B	0.835	D	0.841	D	0.006	NO	0.802	D	NO
CEDROS AV (WEST)	@ VENTURA BL	A.M.	0.551	A	0.784	C	0.796	C	0.012	NO	0.759	C	NO
		P.M.	0.782	C	0.941	E	0.959	E	0.018	YES	0.922	E	NO
COLDWATER CANYON AV	@ MOORPARK ST	A.M.	0.749	C	0.953	E	0.955	E	0.002	NO	0.945	E	NO
		P.M.	0.844	D	1.103	F	1.105	F	0.002	NO	1.095	F	NO
COLDWATER CANYON AV	@ US 101 NB RAMPS	A.M.	0.416	A	0.560	A	0.562	A	0.002	NO	0.552	A	NO
		P.M.	0.440	A	0.551	A	0.553	A	0.002	NO	0.543	A	NO
COLDWATER CANYON AV	@ US 101 SB RAMPS	A.M.	0.485	A	0.632	B	0.633	B	0.001	NO	0.623	B	NO
		P.M.	0.449	A	0.605	B	0.607	B	0.002	NO	0.597	A	NO
COLDWATER CANYON AV	@ VENTURA BL	A.M.	0.859	D	1.217	F	1.235	F	0.018	YES	1.195	F	NO
		P.M.	1.073	F	1.491	F	1.517	F	0.026	YES	1.477	F	NO
COLFAX AV	@ MOORPARK ST	A.M.	0.739	C	0.864	D	0.866	D	0.002	NO	0.856	D	NO
		P.M.	0.569	A	0.654	B	0.655	B	0.001	NO	0.645	B	NO
COLFAX AV	@ RIVERSIDE DR	A.M.	0.853	D	1.000	E	1.001	F	0.001	NO	0.991	E	NO
		P.M.	0.709	C	1.005	F	1.007	F	0.002	NO	0.997	E	NO
COLFAX AV	@ VENTURA BL	A.M.	0.580	A	0.770	C	0.791	C	0.021	NO	0.753	C	NO
		P.M.	0.840	D	1.032	F	1.059	F	0.027	YES	1.021	F	NO
CRESCENT HEIGHTS BL	@ SUNSET BL	A.M.	0.985	E	1.243	F	1.249	F	0.006	NO	1.249	F	NO
		P.M.	0.870	D	0.981	E	0.983	E	0.002	NO	0.983	E	NO
DIXIE CANYON AV	@ VENTURA BL	A.M.	0.415	A	0.665	B	0.680	B	0.015	NO	0.643	B	NO
		P.M.	0.491	A	0.701	C	0.722	C	0.021	NO	0.685	B	NO
EUREKA DR	@ VENTURA BL	A.M.	0.464	A	0.695	B	0.721	C	0.026	NO	0.685	B	NO
		P.M.	0.552	A	0.668	B	0.697	B	0.029	NO	0.660	B	NO
FAIRFAX AV	@ HOLLYWOOD BL	A.M.	0.824	D	0.950	E	0.966	E	0.016	YES	0.873	D	NO
		P.M.	0.713	C	0.875	D	0.880	D	0.005	NO	0.880	D	NO
FAIRFAX AV	@ SUNSET BL	A.M.	0.611	B	0.728	C	0.740	C	0.012	NO	0.740	C	NO
		P.M.	0.739	C	0.949	E	0.958	E	0.009	NO	0.958	E	NO
FOREST LAWN DR	@ ZOO DR	A.M.	0.831	D	1.141	F	1.162	F	0.021	YES	0.555	A	NO
		P.M.	0.600	A	0.816	D	0.877	D	0.061	YES	0.719	C	NO
FORMAN AV	@ RIVERSIDE DR	A.M.	0.449	A	0.798	C	0.823	D	0.025	YES	0.809	D	NO
		P.M.	0.536	A	0.901	E	0.955	E	0.054	YES	0.873	D	NO
FULTON AV	@ VENTURA BL	A.M.	0.603	B	0.857	D	0.872	D	0.015	NO	0.835	D	NO
		P.M.	0.665	B	0.868	D	0.888	D	0.020	YES	0.851	D	NO
HAZELTINE AV (WEST)	@ VENTURA BL	A.M.	0.674	B	0.751	C	0.765	C	0.014	NO	0.728	C	NO
		P.M.	0.619	B	0.871	D	0.890	D	0.019	NO	0.853	D	NO
HIGHLAND AV	@ CAMROSE DR	A.M.	0.586	A	0.744	C	0.765	C	0.021	NO	0.733	C	NO
		P.M.	0.511	A	0.697	B	0.717	C	0.020	NO	0.678	B	NO
HIGHLAND AV	@ FOUNTAIN AV	A.M.	0.834	D	0.991	E	1.000	E	0.009	NO	0.990	E	NO
		P.M.	0.658	B	0.793	C	0.805	D	0.012	NO	0.795	C	NO
HIGHLAND AV	@ FRANKLIN AV [b]	A.M.	-	F	-	F	-	F	0.029	YES	-	F	NO
		P.M.	-	F	-	F	-	F	0.022	YES	-	F	NO

[b] LOS based on field observations; the project incremental impact was calculated using the travel demand simulation model developed for this project.
*** Indicates oversaturated conditions. Delay cannot be calculated.

ATTACHMENT 9-7
Pg 2

ATTACHMENT F-1
NBC UNIVERSAL EVOLUTION PLAN
PROJECT IMPACT SUMMARY - LEVEL OF SERVICE (SIGNALIZED INTERSECTIONS)

Intersection			Peak Hour	2006 Existing		2030 Base		2030 with Project with TDM				2030 with Project with TDM and Funded Improvements		
				V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	Change in V/C	Significant Impact?	V/C or Delay	LOS	Impact Remain ?
HIGHLAND AV	@ FRANKLIN PL/FRANKLIN AV	[a]	A.M.	-	F	-	F	-	F	0.030	YES	-	F	NO
			P.M.	-	F	-	F	-	F	0.019	YES	-	F	NO
HIGHLAND AV	@ HOLLYWOOD BL	[a]	A.M.	-	E	-	F	-	F	0.028	YES	-	F	NO
			P.M.	-	E	-	F	-	F	0.039	YES	-	F	NO
HIGHLAND AV	@ ODIN ST		A.M.	0.643	B	0.861	D	0.891	D	0.030	YES	0.849	D	NO
			P.M.	0.523	A	0.710	C	0.733	C	0.023	NO	0.691	B	NO
HIGHLAND AV	@ SANTA MONICA BL		A.M.	0.776	C	0.918	E	0.927	E	0.009	NO	0.917	E	NO
			P.M.	0.805	D	0.938	E	0.940	E	0.002	NO	0.930	E	NO
HIGHLAND AV	@ SUNSET BL		A.M.	0.612	B	0.930	E	0.970	E	0.040	YES	0.864	D	NO
			P.M.	0.651	B	0.896	D	0.930	E	0.034	YES	0.888	D	NO
KESTER AV	@ VENTURA BL		A.M.	0.663	B	0.777	C	0.777	C	0.000	NO	0.753	C	NO
			P.M.	0.635	B	0.818	D	0.828	D	0.010	NO	0.791	C	NO
KESTER AV (EAST)	@ VENTURA BL		A.M.	0.515	A	0.697	B	0.709	C	0.012	NO	0.672	B	NO
			P.M.	0.885	D	0.996	E	1.013	F	0.017	YES	0.977	E	NO
KRAFT AV/SR 170 SB OFF-RAMP	@ RIVERSIDE DR		A.M.	0.471	A	0.663	B	0.696	B	0.033	NO	0.643	B	NO
			P.M.	0.425	A	0.613	B	0.621	B	0.008	NO	0.593	A	NO
LA BREA AV	@ FOUNTAIN AV		A.M.	0.921	E	1.076	F	1.085	F	0.009	NO	1.085	F	NO
			P.M.	0.868	D	1.033	F	1.037	F	0.004	NO	1.037	F	NO
LA BREA AV	@ FRANKLIN AV	[a]	A.M.	--	D	-	E	-	E	0.018	YES	-	E	NO
			P.M.	--	D	-	E	-	E	0.019	YES	-	E	NO
LA BREA AV	@ HOLLYWOOD BL		A.M.	0.831	D	1.026	F	1.054	F	0.028	YES	0.997	E	NO
			P.M.	0.773	C	0.930	E	0.948	E	0.018	YES	0.908	E	NO
LA BREA AV	@ SUNSET BL		A.M.	0.767	C	0.929	E	0.943	E	0.014	YES	0.903	E	NO
			P.M.	0.830	D	1.091	F	1.110	F	0.019	YES	1.100	F	NO
LANKERSHIM BL/TUJUNGA AV	@ BURBANK BL		A.M.	0.719	C	1.188	F	1.196	F	0.007	NO	1.186	F	NO
			P.M.	0.835	D	1.170	F	1.175	F	0.005	NO	1.165	F	NO
* LANKERSHIM BL	@ CAHUENGA BL		A.M.	0.484	A	0.837	D	0.925	E	0.088	YES	0.771	C	YES
			P.M.	0.354	A	0.636	B	0.684	B	0.048	NO	0.553	A	NO
LANKERSHIM BL	@ CHANDLER BL (NORTH)		A.M.	0.343	A	0.594	A	0.602	B	0.008	NO	0.602	B	NO
			P.M.	0.186	A	0.353	A	0.362	A	0.009	NO	0.362	A	NO
LANKERSHIM BL	@ CHANDLER BL (SOUTH)		A.M.	0.480	A	0.758	C	0.767	C	0.009	NO	0.767	C	NO
			P.M.	0.337	A	0.609	B	0.620	B	0.011	NO	0.620	B	NO
LANKERSHIM BL	@ MAGNOLIA BL		A.M.	0.799	C	1.197	F	1.206	F	0.009	NO	1.196	F	NO
			P.M.	0.726	C	1.107	F	1.115	F	0.008	NO	1.105	F	NO
LANKERSHIM BL	@ MOORPARK ST		A.M.	1.033	F	1.368	F	1.454	F	0.086	YES	1.129	F	NO
			P.M.	0.847	D	1.178	F	1.215	F	0.037	YES	1.120	F	NO
LANKERSHIM BL	@ RIVERSIDE DR		A.M.	0.850	D	1.259	F	1.329	F	0.070	YES	1.184	F	NO
			P.M.	0.775	C	1.060	F	1.110	F	0.050	YES	1.010	F	NO
LANKERSHIM BL	@ SR 134 WB OFF-RAMP		A.M.	0.681	B	0.935	E	0.963	E	0.028	YES	0.914	E	NO
			P.M.	0.429	A	0.597	A	0.617	B	0.020	NO	0.607	B	NO
LANKERSHIM BL	@ US 101 NB OFF-RAMP		A.M.	0.520	A	0.907	E	1.093	F	0.186	YES	0.722	C	NO
			P.M.	0.445	A	0.877	D	0.987	E	0.110	YES	0.667	B	NO
LANKERSHIM BL	@ VENTURA BL/CAHUENGA BL		A.M.	0.723	C	0.952	E	0.995	E	0.043	YES	0.902	E	NO
			P.M.	0.624	B	0.911	E	1.003	F	0.092	YES	0.859	D	NO

[a] LOS based on field observations; the project incremental impact was calculated using the travel demand simulation model developed for this project.
-- Indicates oversaturated conditions. Delay cannot be calculated.

* UNMITIGATABLE IMPACT

ATTACHMENT 2-7
PG 3

ATTACHMENT F-1
NBC UNIVERSAL EVOLUTION PLAN
PROJECT IMPACT SUMMARY - LEVEL OF SERVICE (SIGNALIZED INTERSECTIONS)

Intersection		Peak Hour	2006 Existing		2030 Base		2030 with Project with TDM				2030 with Project with TDM and Funded Improvements		
			V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	Change in V/C	Significant Impact?	V/C or Delay	LOS	Impact Remain ?
LANKERSHIM BL	@ WHIPPLE ST	A.M.	0.722	C	0.951	E	1.025	F	0.074	YES	0.880	D	NO
		P.M.	0.317	A	0.489	A	0.522	A	0.033	NO	0.512	A	NO
LAUREL CANYON BL	@ HOLLYWOOD BL	A.M.	0.487	A	0.607	B	0.608	B	0.001	NO	0.598	A	NO
		P.M.	0.700	B	0.754	C	0.755	C	0.001	NO	0.745	C	NO
LAUREL CANYON BL	@ MOORPARK ST	A.M.	0.919	E	1.174	F	1.178	F	0.004	NO	1.108	F	NO
		P.M.	1.077	F	1.287	F	1.292	F	0.005	NO	1.282	F	NO
LAUREL CANYON BL	@ US 101 NB RAMPS	A.M.	0.580	A	0.765	C	0.765	C	0.000	NO	0.755	C	NO
		P.M.	0.515	A	0.692	B	0.692	B	0.000	NO	0.682	B	NO
LAUREL CANYON BL	@ US 101 SB RAMPS	A.M.	0.518	A	0.735	C	0.736	C	0.001	NO	0.726	C	NO
		P.M.	0.541	A	0.646	B	0.646	B	0.000	NO	0.636	B	NO
LAUREL CANYON BL	@ VENTURA BL	A.M.	0.869	D	1.152	F	1.173	F	0.021	YES	1.133	F	NO
		P.M.	0.873	D	1.069	F	1.096	F	0.027	YES	1.056	F	NO
LAURELGROVE AV	@ VENTURA BL	A.M.	0.459	A	0.600	B	0.627	B	0.018	NO	0.590	A	NO
		P.M.	0.548	A	0.729	C	0.754	C	0.025	NO	0.717	C	NO
LEDGE AV/MOORPARK WAY	@ RIVERSIDE DR	A.M.	0.627	B	1.070	F	1.122	F	0.052	YES	0.945	E	NO
		P.M.	0.636	B	1.067	F	1.140	F	0.073	YES	0.976	E	NO
MEMORIAL DR	@ FOREST LAWN DR	A.M.	0.402	A	0.529	A	0.541	A	0.012	NO	0.530	A	NO
		P.M.	0.464	A	0.535	A	0.576	A	0.041	NO	0.567	A	NO
MOUNT SENAI DR	@ FOREST LAWN DR	A.M.	0.415	A	0.531	A	0.542	A	0.011	NO	0.528	A	NO
		P.M.	0.408	A	0.443	A	0.483	A	0.040	NO	0.464	A	NO
MTA DWY	@ CAMPO DE CAHUENGA WAY	A.M.	0.000	A	0.000	A	0.015	A	0.015	NO	0.010	A	NO
		P.M.	0.291	A	0.607	B	0.666	B	0.059	NO	0.713	C	YES
MULHOLLAND DR	@ CAHUENGA BL	A.M.	0.736	C	1.051	F	1.480	F	0.429	YES	1.042	F	NO
		P.M.	0.668	B	1.061	F	1.111	F	0.050	YES	1.046	F	NO
NOBLE AV	@ VENTURA BL	A.M.	0.579	A	0.815	D	0.827	D	0.012	NO	0.790	C	NO
		P.M.	0.707	C	0.873	D	0.884	D	0.011	NO	0.847	D	NO
OAKCREST DR	@ CAHUENGA BL	A.M.	0.753	C	0.973	E	1.035	F	0.062	YES	0.950	E	NO
		P.M.	0.494	A	0.722	C	0.759	C	0.036	NO	0.694	B	NO
OAKSHIRE DR	@ CAHUENGA BL	A.M.	0.529	A	0.718	C	0.831	D	0.113	YES	0.640	D	NO
		P.M.	0.396	A	0.776	C	0.880	D	0.104	YES	0.638	B	NO
ODIN ST	@ CAHUENGA BL	A.M.	--	F	0.571	A	0.577	A	0.006	NO	0.577	A	NO
		P.M.	--	F	0.771	C	0.787	C	0.016	NO	0.787	C	NO
PLAZA PKWY	@ VENTURA BL	A.M.	0.538	A	0.804	D	0.844	D	0.040	YES	0.711	C	NO
		P.M.	0.381	A	0.559	A	0.589	A	0.030	NO	0.553	A	NO
RADFORD AV/VENTURA PL	@ VENTURA BL	A.M.	0.456	A	0.649	B	0.671	B	0.022	NO	0.644	B	NO
		P.M.	0.574	A	0.640	B	0.650	B	0.010	NO	0.636	B	NO
RIVERTON AV/CAMPO DE CAHUENGA WY	@ VENTURA BL	A.M.	0.444	A	0.643	B	0.653	B	0.010	NO	0.697	B	NO
		P.M.	0.400	A	0.616	B	0.651	B	0.035	NO	0.657	B	NO
SEPULVEDA BL	@ VENTURA BL	A.M.	1.024	F	1.201	F	1.201	F	0.000	NO	1.264	F	NO
		P.M.	1.221	F	1.485	F	1.485	F	0.000	NO	1.485	F	NO
SR 170 NB RAMPS	@ MAGNOLIA BL	A.M.	0.360	A	0.551	A	0.561	A	0.010	NO	0.521	A	NO
		P.M.	0.435	A	0.712	C	0.715	C	0.003	NO	0.705	C	NO
SR 170 SB RAMPS	@ MAGNOLIA BL	A.M.	0.515	A	0.776	C	0.785	C	0.009	NO	0.746	C	NO
		P.M.	0.488	A	0.600	B	0.609	B	0.009	NO	0.566	A	NO

[a] LOS based on field observations; the project incremental impact was calculated using the travel demand simulation model developed for this project.
-- Indicates oversaturated conditions. Delay cannot be calculated.

** UN MITIGABLE IMPACT - STUDIO CITY

ATTACHMENT 37
PG 4

ATTACHMENT F-1
NBC UNIVERSAL EVOLUTION PLAN
PROJECT IMPACT SUMMARY - LEVEL OF SERVICE (SIGNALIZED INTERSECTIONS)

Intersection		Peak Hour	2006 Existing		2030 Base		2030 with Project with TDM				2030 with Project with TDM and Funded Improvements		
			V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	Change in V/C	Significant Impact?	V/C or Delay	LOS	Impact Remain ?
STERN AV (WEST)	@ VENTURA BL	A.M.	0.619	A	0.597	A	0.611	B	0.014	NO	0.575	A	NO
		P.M.	0.427	A	0.605	B	0.625	B	0.020	NO	0.588	A	NO
STUDIO CITY PI	@ VENTURA BL	A.M.	0.611	A	0.617	B	0.641	B	0.024	NO	0.605	C	NO
		P.M.	0.562	A	0.683	B	0.713	C	0.030	NO	0.677	B	NO
SUNNYSLOPE AV	@ VENTURA BL	A.M.	0.374	A	0.697	B	0.712	C	0.015	NO	0.675	B	NO
		P.M.	0.399	A	0.624	B	0.644	B	0.020	NO	0.607	B	NO
TUJUNGA AV	@ RIVERSIDE DR/CAMARILLO ST	A.M.	0.944	E	1.171	F	1.196	F	0.025	YES	1.155	F	NO
		P.M.	0.849	D	1.126	F	1.130	F	0.004	NO	1.120	F	NO
TUJUNGA AV	@ VENTURA BL	A.M.	0.487	A	0.696	B	0.717	C	0.021	NO	0.680	B	NO
		P.M.	0.659	B	0.841	D	0.871	D	0.030	YES	0.835	D	NO
TYRONE AV/BEVERLY GLEN BL	@ VENTURA BL	A.M.	0.564	A	0.864	D	0.877	D	0.013	NO	0.841	D	NO
		P.M.	0.772	C	1.004	F	1.007	F	0.003	NO	0.971	E	NO
UNIVERSAL STUDIOS BL	@ CAHUENGA BL	A.M.	0.473	A	0.668	B	0.796	C	0.128	YES	0.581	A	NO
		P.M.	0.329	A	0.724	C	0.897	D	0.173	YES	0.747	C	NO
** US 101 NB RAMPS	@ CAMPO DE CAHUENGA WAY	A.M.	0.077	A	0.235	A	0.261	A	0.026	NO	0.241	A	NO
		P.M.	0.408	A	0.667	B	0.775	C	0.058	YES	0.725	C	YES
US 101 SB RAMPS/REGAL PL	@ CAHUENGA BL	A.M.	0.607	B	0.846	D	0.897	D	0.051	YES	0.844	D	NO
		P.M.	0.528	A	0.810	D	0.904	E	0.094	YES	0.734	C	NO
US 101 SB RAMPS W/O BARHAM BL/CAHUENGA BL	@ CAHUENGA BL	A.M.	0.952	E	1.225	F	1.345	F	0.120	YES	1.131	F	NO
		P.M.	0.643	B	1.368	F	1.512	F	0.144	YES	1.266	F	NO
VALLEY VISTA BL/ETHEL AV	@ VENTURA BL	A.M.	0.493	A	0.775	C	0.793	C	0.018	NO	0.757	C	NO
		P.M.	0.519	A	0.765	C	0.788	C	0.023	NO	0.751	C	NO
VAN NUYS BL	@ VENTURA BL	A.M.	0.849	D	1.125	F	1.141	F	0.016	YES	1.101	F	NO
		P.M.	1.003	F	1.297	F	1.318	F	0.021	YES	1.276	F	NO
VANTAGE AV	@ VENTURA BL	A.M.	0.509	A	0.682	B	0.703	C	0.021	NO	0.666	B	NO
		P.M.	0.533	A	0.710	C	0.734	C	0.024	NO	0.697	B	NO
VINE ST	@ FRANKLIN AV/US 101 SB OFF-RAMP	A.M.	0.343	A	0.665	B	0.667	B	0.002	NO	0.657	B	NO
		P.M.	0.459	A	0.543	A	0.547	A	0.004	NO	0.537	A	NO
VINELAND AV	@ BURBANK BL	A.M.	0.805	D	0.843	D	0.849	D	0.006	NO	0.839	D	NO
		P.M.	0.756	C	0.798	C	0.803	D	0.005	NO	0.793	C	NO
VINELAND AV/LANKERSHIM BL	@ CAMARILLO ST	A.M.	0.933	E	1.351	F	1.376	F	0.025	YES	1.325	F	NO
		P.M.	0.725	C	1.205	F	1.221	F	0.016	YES	1.209	F	NO
VINELAND AV	@ MAGNOLIA BL	A.M.	0.513	A	1.101	F	1.104	F	0.003	NO	1.092	F	NO
		P.M.	0.734	C	1.402	F	1.406	F	0.004	NO	1.390	F	NO
VINELAND AV	@ MOORPARK ST	A.M.	0.871	D	1.127	F	1.142	F	0.015	YES	1.056	F	NO
		P.M.	0.793	C	1.056	F	1.078	F	0.022	YES	1.050	F	NO
VINELAND AV	@ RIVERSIDE DR	A.M.	0.809	D	1.124	F	1.172	F	0.048	YES	1.066	F	NO
		P.M.	0.559	A	0.820	D	0.853	D	0.033	YES	0.801	D	NO
VINELAND AV	@ US 101 NB OFF-RAMP	A.M.	0.307	A	0.484	A	0.496	A	0.012	NO	0.481	A	NO
		P.M.	0.282	A	0.405	A	0.409	A	0.004	NO	0.399	A	NO
VINELAND AV	@ US 101 SB RAMPS	A.M.	0.527	A	0.724	C	0.760	C	0.036	NO	0.580	A	NO
		P.M.	0.369	A	0.664	B	0.680	B	0.016	NO	0.660	A	NO
VINELAND AV	@ VENTURA BL	A.M.	0.687	B	1.027	F	1.072	F	0.045	YES	0.906	E	NO
		P.M.	0.821	D	1.049	F	1.088	F	0.039	YES	0.988	E	NO

(a) LOS based on field observations; the project incremental impact was calculated using the travel demand simulation model developed for this project.
** Indicates oversaturated conditions. Delay cannot be calculated.

** US UNAVOIDABLE IMPACT STUDIO CITY

ATTACHMENT #7
Pg 5

ATTACHMENT F-1
NBC UNIVERSAL EVOLUTION PLAN
PROJECT IMPACT SUMMARY - LEVEL OF SERVICE (SIGNALIZED INTERSECTIONS)

Intersection		Peak Hour	2006 Existing		2030 Base		2030 with Project with TDM				2030 with Project with TDM and Funded Improvements		
			V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	Change in V/C	Significant Impact?	V/C or Delay	LOS	Impact Remain ?
VINELAND AV	@ WHIPPLE ST	A.M.	0.433	A	0.500	A	0.504	A	0.004	NO	0.494	A	NO
		P.M.	0.364	A	0.446	A	0.448	A	0.002	NO	0.438	A	NO
WARNER BRS STUDIOS GATE 7/GATE 5	@ FOREST LAWN DR	A.M.	0.526	A	0.732	C	0.744	C	0.012	NO	0.726	C	NO
		P.M.	0.466	A	0.542	A	0.582	A	0.040	NO	0.560	A	NO
WHITSETT AV/LAUREL TERRACE DR	@ VENTURA BL	A.M.	0.555	A	0.744	C	0.763	C	0.019	NO	0.723	C	NO
		P.M.	0.661	B	0.904	E	0.929	E	0.025	YES	0.889	D	NO
WILLIS AV	@ VENTURA BL	A.M.	0.434	A	0.676	B	0.689	B	0.013	NO	0.652	B	NO
		P.M.	0.549	A	0.729	C	0.747	C	0.018	NO	0.711	C	NO
WOODMAN AV	@ VENTURA BL	A.M.	0.588	A	0.818	D	0.833	D	0.015	NO	0.790	C	NO
		P.M.	0.587	A	0.903	E	0.923	E	0.020	YES	0.887	D	NO
COUNTY OF LOS ANGELES													
LANKERSHIM BL	@ CAMPO DE CAHUENGA WAY/UHO	A.M.	0.517	A	1.034	F	1.229	F	0.195	YES	1.174	F	YES
		P.M.	0.531	A	1.375	F	1.547	F	0.172	YES	1.160	F	NO
LANKERSHIM BL	@ MAIN ST	A.M.	0.431	A	0.880	D	0.932	E	0.052	YES	0.763	C	NO
		P.M.	0.390	A	0.760	C	0.952	E	0.192	YES	0.724	C	YES
LANKERSHIM BL	@ VALLEYHEART DR/JAMES STEWART AV	A.M.	0.329	A	0.715	C	0.762	C	0.047	YES	0.684	B	NO
		P.M.	0.356	A	0.904	E	0.981	E	0.077	YES	0.799	C	NO
UNIVERSAL CTR DR/UNIVERSAL STUDIOS BL	@ CORAL DR/BUDDY HOLLY DR	A.M.	0.065	A	0.397	A	0.514	A	0.117	NO	0.418	A	NO
		P.M.	0.159	A	0.892	D	0.956	E	0.064	YES	0.820	D	NO
CITY OF BURBANK													
BOB HOPE DR	@ ALAMEDA AV	A.M.	0.622	B	0.985	E	0.990	E	0.005	NO	0.990	E	NO
		P.M.	0.636	B	1.013	F	1.017	F	0.004	NO	1.017	F	NO
BUENA VISTA ST	@ ALAMEDA AV	A.M.	0.750	C	0.937	E	0.939	E	0.002	NO	0.935	E	NO
		P.M.	0.838	D	0.946	E	0.949	E	0.003	NO	0.945	E	NO
BUENA VISTA ST	@ MAGNOLIA BL	A.M.	0.576	A	1.068	F	1.072	F	0.004	NO	1.072	F	NO
		P.M.	0.846	D	1.147	F	1.148	F	0.001	NO	1.148	F	NO
BUENA VISTA ST	@ OLIVE AV	A.M.	0.796	C	1.121	F	1.127	F	0.006	NO	1.081	F	NO
		P.M.	0.776	C	1.099	F	1.102	F	0.003	NO	1.054	F	NO
BUENA VISTA ST/SR 134 EB ON-RAMP	@ RIVERSIDE DR/SR 134 WB RAMPS	A.M.	0.777	C	1.075	F	1.076	F	0.001	NO	1.076	F	NO
		P.M.	0.809	D	1.020	F	1.022	F	0.002	NO	1.018	F	NO
BUENA VISTA ST	@ VERDUGO AVENUE	A.M.	0.601	B	1.012	F	1.013	F	0.001	NO	1.015	F	NO
		P.M.	0.731	C	1.176	F	1.181	F	0.005	NO	1.178	F	NO
CALIFORNIA ST	@ RIVERSIDE DR	A.M.	0.335	A	0.605	B	0.607	B	0.002	NO	0.607	B	NO
		P.M.	0.253	A	0.827	D	0.829	D	0.002	NO	0.826	D	NO
CORDOVA ST/SR 134 WB OFF-RAMP	@ ALAMEDA AV	A.M.	0.661	B	1.040	F	1.045	F	0.005	NO	1.045	F	NO
		P.M.	0.503	A	1.176	F	1.182	F	0.006	NO	1.182	F	NO
EVERGREEN ST/RIVERSIDE DR	@ ALAMEDA AV	A.M.	0.530	A	0.740	C	0.764	C	0.024	NO	0.743	C	NO
		P.M.	0.595	A	0.827	D	0.868	D	0.041	YES	0.829	D	NO
HOLLYWOOD WAY	@ ALAMEDA AV	A.M.	0.773	C	1.259	F	1.264	F	0.005	NO	1.268	F	NO
		P.M.	0.749	C	1.264	F	1.272	F	0.008	NO	1.272	F	NO
HOLLYWOOD WAY	@ MAGNOLIA BL	A.M.	0.806	D	1.277	F	1.281	F	0.004	NO	1.285	F	NO
		P.M.	0.868	D	1.053	F	1.059	F	0.006	NO	1.059	F	NO
HOLLYWOOD WAY	@ OLIVE AV	A.M.	0.550	A	0.791	C	0.818	D	0.027	YES	0.791	C	NO
		P.M.	0.681	B	1.207	F	1.231	F	0.024	YES	1.212	F	NO

[a] LOS based on field observations; the project incremental impact was calculated using the travel demand simulation model developed for this project.
** Indicates oversaturated conditions. Delay cannot be calculated.

** UNMITIGATABLE IMPACT – STUDIO CITY

ATTACHMENT 2)
Pg 6

ATTACHMENT F-1
NBC UNIVERSAL EVOLUTION PLAN
PROJECT IMPACT SUMMARY - LEVEL OF SERVICE (SIGNALIZED INTERSECTIONS)

Intersection		Peak Hour	2006 Existing		2030 Base		2030 with Project with TDM				2030 with Project with TDM and Funded Improvements		
			V/C or Delay	LOS	V/C or Delay	LOS	V/C or Delay	LOS	Change in V/C	Significant Impact?	V/C or Delay	LOS	Impact Remain ?
HOLLYWOOD WAY	@ VERDUGO AV	A.M.	0.814	D	1.266	F	1.270	F	0.005	NO	1.273	F	NO
		P.M.	0.800	C	1.162	F	1.169	F	0.007	NO	1.165	F	NO
LIMA ST	@ OLIVE AV	A.M.	0.434	A	0.435	A	0.444	A	0.009	NO	0.415	A	NO
		P.M.	0.396	A	0.452	A	0.463	A	0.011	NO	0.433	A	NO
OLIVE AV	@ ALAMEDA AV	A.M.	0.569	A	0.937	E	0.941	E	0.004	NO	0.852	D	NO
		P.M.	0.710	C	1.100	F	1.109	F	0.009	NO	1.016	F	NO
OLIVE AV	@ PASS AV	A.M.	0.673	B	0.997	E	1.021	F	0.054	YES	0.841	D	NO
		P.M.	0.747	C	0.948	E	1.042	F	0.094	YES	0.792	C	NO
OLIVE AV	@ RIVERSIDE DR	A.M.	0.602	B	0.786	C	0.796	C	0.010	NO	0.750	C	NO
		P.M.	0.572	A	0.871	D	0.880	D	0.009	NO	0.842	D	NO
OLIVE AV	@ WARNER BROS STUDIOS GATE 1/LAKESIDE DR	A.M.	0.655	B	0.652	B	0.673	B	0.021	NO	0.628	B	NO
		P.M.	0.744	C	0.825	D	0.871	D	0.046	YES	0.807	D	NO
OLIVE AV	@ WARNER BROS STUDIOS GATE 2/GATE 3	A.M.	0.430	A	0.807	D	0.846	D	0.039	YES	0.785	C	NO
		P.M.	0.501	A	0.853	D	0.901	E	0.048	YES	0.861	D	YES
PASS AV	@ ALAMEDA AV	A.M.	0.590	A	0.967	E	0.978	E	0.011	YES	0.963	E	NO
		P.M.	0.713	C	1.078	F	1.093	F	0.015	YES	1.016	F	NO
PASS AV	@ MAGNOLIA BL	A.M.	0.406	A	0.776	C	0.782	C	0.006	NO	0.799	C	NO
		P.M.	0.529	A	0.889	D	0.897	D	0.008	NO	0.892	D	NO
PASS AV	@ OAK ST	A.M.	0.369	A	0.526	A	0.531	A	0.005	NO	0.545	A	NO
		P.M.	0.425	A	0.626	B	0.633	B	0.007	NO	0.630	B	NO
PASS AV	@ RIVERSIDE DR	A.M.	0.461	A	0.818	D	0.860	D	0.042	YES	0.760	C	NO
		P.M.	0.363	A	0.641	B	0.675	B	0.034	NO	0.685	B	NO
PASS AV	@ SR 134 EB OFF-RAMP	A.M.	0.499	A	0.789	C	0.797	C	0.008	NO	0.760	C	NO
		P.M.	0.598	A	0.696	B	0.709	C	0.013	NO	0.659	B	NO
PASS AV	@ VERDUGO LN	A.M.	0.477	A	0.866	D	0.879	D	0.013	NO	0.840	D	NO
		P.M.	0.590	A	1.203	F	1.217	F	0.014	YES	1.147	F	NO
CITY OF WEST HOLLYWOOD													
LA BREA AV	@ SANTA MONICA BL	A.M.	0.809	D	0.977	E	0.985	E	0.008	NO	0.985	E	NO
		P.M.	0.844	D	1.080	F	1.086	F	0.006	NO	1.086	F	NO
LA CIENEGA BL	@ SANTA MONICA BL	A.M.	0.979	E	1.067	F	1.068	F	0.001	NO	1.068	F	NO
		P.M.	0.803	D	0.916	E	0.919	E	0.003	NO	0.919	E	NO
LA CIENEGA BL	@ SUNSET BL	A.M.	0.653	B	0.831	D	0.839	D	0.008	NO	0.839	D	NO
		P.M.	1.031	F	1.218	F	1.227	F	0.009	NO	1.227	F	NO
SAN VICENTE BL/CLARK ST	@ SUNSET BL	A.M.	0.829	D	0.959	E	0.966	E	0.007	NO	0.966	E	NO
		P.M.	0.944	E	1.117	F	1.123	F	0.006	NO	1.123	F	NO

ATTACHMENT A-7
PG 17

* UN MITIGATABLE IMPACT

[a] LOS based on field observations; the project incremental impact was calculated using the travel demand simulation model developed for this project.
** Indicates oversaturated conditions. Delay cannot be calculated.

Response to Comment No. 12-413

Attachment 27 consists of a copy of pages of the Los Angeles Department of Transportation's Assessment Letter from the Draft EIR, with notations added by the commenter regarding significant intersection impacts, and is referenced in Comment No. 12-283. The commenter is referred to Response to Comment No. 12-283, above.

Comment No. 12-414

See next page

TRANSPORTATION APPENDIX

CITY OF BURBANK
COMMUNITY DEVELOPMENT DEPARTMENT
275 East Olive Avenue, P.O. Box 6459, Burbank, California 91510-6459
www.ci.burbank.ca.us

FINAL DRAFT

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

Via facsimile to (213) 978-6566 (12 pages) and email to Jon.Foreman@lacity.org

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

Dear Mr. Foreman:

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

Traffic and Transportation

1. Travel Demand Model / Growth Forecasts

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

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

EXHIBIT A

By way of a letter transmitted to the project consulting team in December 2009 (attached hereto), City of Burbank staff acknowledged that the modified model methodology, study area, network and zone structure, background socio-economic data and forecasts, traffic counts, and other data had been developed in accordance with Burbank's policies for project traffic studies. It should be noted that the City has identified errors in the cumulative projects list included in the DEIR (DEIR Exhibit E – Transportation Study, Table 10: Trip Generation Estimates for Cumulative Projects, page 96) including a mischaracterization of the expected development of major studio campuses with large, un-built development entitlements. However, through the collaborative modeling process conducted for the Burbank-specific Alternative Impact Analysis, the City acknowledges that all cumulative projects reasonably foreseeable in the City of Burbank have been accounted for in the travel demand model land use assumptions, even if they are incorrectly listed in the Cumulative Projects table. The Cumulative Projects table should be corrected to accurately reflect the numbers used in the analysis.

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

2. Trip Generation / Transportation Demand Management Credits

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

In addition, a number of trip credits are taken from basic trip generation to account for factors like pass-by trips, internal capture trips, and non-motorized trips. The City believes that application of these credits on top of the already-low trip generation for the retail uses severely undercounts the trip generation. First, ITE provides an average pass-by trip generation credit of 34 percent for shopping centers, while the traffic study applies a 40 to 50 percent credit. This is compounded with an additional credit for walking/cycling/internal capture trips that is inappropriate for the proposed uses, especially since the use of the shopping center rate (instead of explicit ITE rates for retail, restaurant, and other uses commonly found in a shopping center) already implies internal capture of trips due to the nature of a shopping center use. Because these large credits are compounded on top of an already-low trip generation rate (from the

average rate instead of the fitted-curve rate), the City believes the trip generation is underestimated. The City requests the study utilize a lower, more realistic pass-by rate for the retail portions of the project. Finally, it is possible that on top of these credits an additional Transportation Demand Management (TDM) credit was taken on the community and neighborhood retail portions of the project, although this is not clear from the study (DEIR Appendix E – Transportation Study Table 19 – Proposed Project TDM Program, page 287). The City does not believe that a TDM reduction is appropriate on the retail portions of the project due to the location of the retail in relation to transit.

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

The City also disagrees with the trip generation reduction claimed for the TDM program that is proposed to reduce the project's trip generation. In particular, the study is applying a ~~20~~ 21 percent TDM reduction on ~~1,874 of~~ the 2,937 new housing units proposed for the project. This is an extremely aggressive TDM reduction for housing units in Los Angeles, especially if the housing is targeting upper-income households, requires bus-to-rail transfers, and includes multiple free parking spaces for each housing unit. Other than the provision for free transit passes and a marginal proximity to the Metro Red Line (requiring either a long walk or a bus transfer), there is virtually no incentive for the residents of the housing units in the proposed project to shift to bus or rail. The City suggests that if an aggressive TDM reduction be proposed that it be coupled with equally-aggressive TDM measures such as parking pricing or unbundled free parking, reduced parking ratios (e.g. provide one space per unit), or direct proximity to the Metro Red Line Subway, Metro Rapid bus, or other high-capacity bus services. As proposed, the layout of the residential units in relation to transit amenities and the lack of any true disincentives to driving will not result in a 20 percent trip generation reduction on the housing portion of the project.

These comments also apply to the 25 percent TDM reduction on the office component, especially with regard to the large amounts of parking being provided to office workers. Like the residential, there is little incentive to utilize transit if abundant parking is being provided on site.

The study indicates that a Transportation Management Association (TMA) will be developed for the project, but does not explicitly describe how the TMA would be established, who would be responsible for its administration, or how the TMA would be funded. The City requests that a

mitigation measure be added to specify the details of the required TMA, and to ensure that membership be required by all new and existing commercial and retail tenants of the proposed project. In addition, the City requests that the TMA be required to participate in the trip reduction monitoring required to validate the trip generation caused by each phase of the project.

3. Project Phasing and Mitigations

The project proposes a phased project implementation that conditions development of future phases based on completion of mitigation measures and monitoring of actual trip generation of prior phases. However, while the project identifies specific improvements to be constructed as part of specific project phases, there is no mechanism to ensure that actual trip generation of each phase is correlated to predicted trip generation identified in the study. Given the aggressive trip reductions proposed by the study, the City proposes that the phasing plan include hard trip caps on each phase, such that actual project trip generation is measured at each phase, and that future phases are contingent on achieving trip generation at or below the generation predicted by the study. Development of future phases would be prohibited unless actual trip generation is proven to match the generation identified in the study, and the mitigations identified for each project phase have been completed. The City requests that traffic monitoring infrastructure be built into project driveways for existing and future ~~roadway improvements that serve the new~~ project phases so that ~~adequate~~actual, real-time sampling of traffic volumes of the project can be captured (e.g. installation of loop detectors in project access points and driveways to monitor actual trip generation of the project). This monitoring equipment can be used to verify any trip generation assumptions included in the analysis.

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

~~3~~4. City of Burbank Alternative Impact Analysis Methodology

The City of Burbank Alternative Impact Analysis (DEIR Appendix E – Transportation Study Appendix F: LOS Worksheets and Impact Analysis Other Jurisdictions) indicates that the City's Interim Traffic Study Guidelines (City of Burbank, November 2007) were used to conduct traffic impact analysis under the Alternative Impact Analysis. However, the Significant Impact Criteria described on page F-4 of the Transportation Study Appendix F does not match the criteria outlined in the City's Interim Traffic Study Guidelines. In general, the City's thresholds mirror those of the City of Los Angeles, except that the threshold for intersections at LOS F is more stringent than the City of Los Angeles. The City requests that the intersection impact analysis be reviewed to determine that it is consistent with the City of Burbank Interim Traffic Study Guidelines, or at a minimum conform to the City of Los Angeles significance thresholds (which are substantially similar to the City of Burbank).

~~4~~5. Traffic Signal Improvements

The project has proposed to mitigate certain intersection traffic impacts through improvements to traffic signal infrastructure in the City of Burbank. The project proposes to connect a number of

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

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

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

- **Evergreen at Riverside (Intersection #77, B-28)**: This intersection requires minor traffic signal modification for approximately $50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network requiring including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.
  - Cost: $56K

- **Pass at 134 E/B off-ramp (Intersection #78, B-29):** This intersection requires minor traffic signal modification for approximately $50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network requiring 1200 feet of conduit and fiber optic cable at a cost of $25K and the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.
  - Cost: $81K

- **Pass at Alameda (Intersection #79, B-30)**: This intersection requires minor traffic signal modification for approximately $50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.
  - Cost: $56K

- **Pass at Riverside (Intersection #80, B-31):** This intersection requires minor traffic signal modification for approximately $50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the

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

- Cost: $56K

- **Pass at Olive (Intersection #81, B-32):** Modify the traffic signal at this intersection for approximately $100K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.

  - Cost $106K

- **Olive and Warner Brothers Studio Gate 2/Gate3 (Intersection #83, B-33):** This intersection requires minor traffic signal modification for approximately $50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.

  - Cost: $56K

- **Olive and Warner Brothers Studio Gate 1/Lakeside (Intersection #83, B-34):** Fully modify the traffic signal at this intersection for approximately $250K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.

  - Cost: $256K

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

  - Cost: $6K

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

  - Cost: $256K

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

  - Cost: $56K

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

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

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

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

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

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

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

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

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

~~5~~6. Physical Improvements

The study has identified a number of physical improvements to mitigate project impacts in Burbank. These improvements include roadway intersection restriping, widening, parking removal, and sidewalk narrowing to add roadway capacity in the project area. These improvements have been proposed in response to both the primary, project-wide traffic analysis as well as the secondary, Burbank-specific supplemental analysis that was requested by the City. In some cases these physical improvements are accepted in concept, but the implementation of the improvements is not within acceptable engineering standards (e.g. narrow lanes, reduced-width sidewalks). In other cases, the improvements would reduce on-street parking or restrict turning movements. In some cases these improvements cannot be supported by the City given the Burbank City Council's policy direction with regard to street widening and parking removal. Detailed comments on each proposed physical improvement are described below.

- **Evergreen at Riverside (Intersection #77, B-28)**: The study identifies that that the applicant or its successor should widen the south side of Riverside immediately west of the intersection to provide dual Right Turn Lanes. Widening streets and removing on-street parking in order to increase intersection capacity at this location would not be supported by the City due to policy direction about parking removal and roadway widening. This improvement is also not currently identified by the City as a necessary long-range transportation improvement. The City requests that the project consulting staff work with City staff to identify an alternative physical improvement and, if no acceptable improvement is identified, to consider reductions in the project size to mitigate this impact, or to identify this intersection as an unmitigatable project impact.

- **Pass at Alameda (Intersection #79, B-30)**: The study identifies ~~that~~ that the applicant or its successor should widen the north side of Alameda immediately east of intersection to allow an exclusive west bound 10-foot right turn lane, even though the minimum acceptable curb-lane width is 12 feet. Removing on-street parking in order to increase intersection capacity at this location would not be supported by the City due to policy direction regarding parking removal on City streets.

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

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

- **Pass at Olive (Intersection #81, B-32):** The study identifies that the applicant or its successor widen Olive Avenue to provide dual left turn lanes northbound, three through lanes in each direction, and modify the traffic signal to accommodate this change. This improvement is on the City's long-range transportation plans and is identified as a mitigation measure for another development project in the City of Burbank. However, the study proposes a total of eight 10-foot lanes, including curb lanes, in this stretch of Olive Avenue with a horizontal curve with high rate of speed and reduced sidewalk width. This concept ~~this~~ is not acceptable as it introduces hazardous roadway geometry. The improvement as identified on the City's long-range plans assumes that additional right-of-way is required to construct this improvement from adjacent properties to maintain acceptable lane and sidewalk widths. The City requests that the project consultant staff work with City staff to identify an improvement design that would accommodate acceptable lane and sidewalk widths and identify the required right-of-way needed for the improvement.

- **Olive and Warner Brothers Studio Gate 2/Gate3 (Intersection #83, B-33).** The study does not address the existing on-going conflicts due to the steady flow of vehicles on Olive Avenue blocking the crosswalk on the south side. The City requests the project consulting staff work with City staff to identify an improvement to this conflict and, if no acceptable improvement is identified, to consider reductions in the project size to mitigate this impact, or to identify this intersection as an unmitigatable project impact.

- **Olive and Warner Brothers Studio Gate 1/Lakeside (Intersection #83, B-34):** The study identifies a need to restripe the eastbound direction to provide an exclusive eastbound Right Turn Lane and shared through and Left Turn Lane in that direction. This improvement can be constructed in existing street-widths with minimal effects to on-street parking.

- **Alameda at 134 W/B on-ramp (Intersection #164, B-38):** The study identifies a need to install a traffic signal at the 134 W/B on-ramp west of Hollywood Way and interconnect it with the existing traffic signal at intersection of Alameda and Hollywood Way. However, the level of service analysis for this intersection and the proposed improvement do not consider changes in roadway configuration due to the new westbound 134 on-ramp at Hollywood Way that is under construction and expected to open in April 2011. The City requests that the study be revised to account for the pending ramp improvement and intersection geometry at this location. The City can provide the planned intersection configuration to the project applicant.

- **Alameda at Hollywood Way (Intersection #84):** Level of service analysis for this intersection does not consider changes in roadway configuration due to the new westbound 134 on-ramp at Hollywood Way that is under construction and expected to open in April 2011. The City requests that the study be revised to account for the pending ramp improvement and intersection geometry at this location. The City can provide the planned intersection configuration to the project applicant.

7. Neighborhood Intrusion Impacts

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

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

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

c. The area bounded by Verdugo Avenue, Clybourn Avenue, Clark Avenue, and Hollywood Way

68. Consideration of Previously-Entitled Development Projects and Mitigations

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

79. Transit Improvements

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

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

The City believes that the system should add additional connectivity to the regional bus transit network to help shift the project's trips to transit. The shuttle service should provide a through-

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

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

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

10. Los Angeles River Bicycle Path

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

Public Services

The Public Services sections of the DEIR analyze impacts on services and facilities in the City and County of Los Angeles but do not analyze impacts on services or facilities in the City of Burbank. This is of particular concern for Libraries, Parks and Recreation, and Police services.

The EIR must discuss impacts to public services in general, regardless of the jurisdiction in which the services are located, rather than focusing only on those located in the City and County of Los Angeles.

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

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

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

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

Response to Comment No. 12-414

The Appendix is a copy of a draft comment letter from the City of Burbank which is included and responded to as Comment Letter No. 27 of this Final EIR. The commenter is referred to Comment Letter No. 27. The commenter is also referred to Comment Letter No. 26, which is the final comment letter submitted by the City of Burbank that superseded Comment Letter No. 27. Please refer to Comment Letter No. 26 for responses to the final comment letter submitted by the City of Burbank.

Comment Letter No. 13

Kathy Delle Donne
3rd Council District Appointee
Ventura/Cahuenga Boulevard Corridor Specific Plan Review Board
20 N. Spring Street, Rm. 525
Los Angeles, CA 90012-4801
kakedo@earthlink.net

Comment No. 13-1

Not sure if Jennifer forwarded you the Plan Review Board's comments – so I've attached our letter.

Response to Comment No. 13-1

The introductory comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 13-2

The Ventura/Cahuenga Boulevard Corridor Specific Plan Review Board (PRB) is concerned that the NBC Universal Evolution Plan Draft Environmental Impact Report (DEIR) inadequately addresses issues relating to the Ventura/Cahuenga Boulevard Corridor Specific Plan. The proposed DEIR is in violation of the Ventura/Cahuenga Boulevard Corridor Specific Plan (VCBC Specific Plan) as follows:

Response to Comment No. 13-2

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 13-3

Sign district 2C (Universal City Southern Entry Point sign) of the proposed Universal City Specific Plan in the DEIR violates the VCBC Specific Plan signage regulations. No exception has been requested. If such an exception is requested in the future, the signage, as proposed, will be opposed by the PRB.

Response to Comment No. 13-3

The comment addresses the proposed Universal City Specific Plan Southern Entry Point Sign (Sign District 2C) at the intersection of the Universal Studios Boulevard and Cahuenga Boulevard. Potential impacts related to the proposed Project signage are discussed in the relevant sections of the Draft EIR (e.g., Section IV.D, Visual Qualities; Section IV.E.2, Light and Glare – Artificial Light; etc.). The comment does not address the environmental analysis in the Draft EIR. The Southern Entry Point Sign (proposed Sign District 2C) will no longer be included in the proposed Universal City Specific Plan. The Project does not propose modifications to the Ventura–Cahuenga Boulevard Corridor Specific Plan.

Comment No. 13-4

Additionally:

- The DEIR specifies major regional traffic impacts that affect most if not all of the communities along the corridor without offering anything close to adequate mitigations.

Response to Comment No. 13-4

Potential Project impacts related to traffic are fully analyzed and discussed in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR.

An extensive series of project design features and mitigation measures have been identified to address the Project's significant traffic impacts. While these measures would substantially reduce the Project's impacts, as discussed on pages 690–694 of the Draft EIR, with implementation of the project design features and identified mitigation measures, significant and unavoidable traffic impacts would remain. No additional feasible mitigation measures have been identified to reduce these impacts. The commenter is referred to Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, for further information.

Regarding the remaining significant and unavoidable intersection and freeway segment impacts, as described in Sections 15121(a) and 15362 of the *CEQA Guidelines*, an EIR is an informational document which will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." (Public Resources Code Section 21002.1(a).) "Each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves *whenever it is feasible to do so*."

(Public Resources Code Section 21002.1(b) (emphasis added).) If economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment, the project may still be approved at the discretion of the public agency. (Public Resources Code Section 21002.1(c).)

In approving a project which will result in the occurrence of significant effects which are identified in the final EIR but not avoided or substantially lessened, the lead agency must state the specific reasons to support its action in a statement of overriding considerations. The decision whether to approve the Project and adopt a statement of overriding considerations will be made by the decision-makers consistent with CEQA.

The commenter is also referred to Topical Response No. 1: EIR Process (see Section III.C, Topical Responses, of this Final EIR). The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 13-5

- The DEIR suggests Significant parking impacts but characterizes them as "less than significant." The PRB strongly disagrees with that characterization.

Response to Comment No. 13-5

Section IV.B.2, Traffic/Access – Parking, of the Draft EIR and Chapter X of the Transportation Study for the NBC Universal Evolution Plan Environmental Impact Report (Gibson Transportation Consulting, Inc. and Raju Associates, Inc., March 2010) (the "Transportation Study," Appendix E-1 of the Draft EIR) provide a detailed analysis of Project parking impacts.

As discussed on page 951–952 and shown in Table 45 of the Draft EIR, the proposed City Specific Plan requirements provide for equal or more parking than that required by the Los Angeles Municipal Code for the specific uses, except with regard to restaurants and fitness facilities. Based on the analysis, as discussed on pages 953–955 of the Draft EIR, the parking demand analysis shows that the Project would provide sufficient parking to meet the demand requirements of the proposed Specific Plan land uses under the proposed land use mix. Therefore, Project impacts related to parking under the proposed City Specific Plan would be less than significant. The Project would be developed as an urban mixed-use transit-oriented development that is accessible via a number of alternative modes of travel. In addition, the Project would include residential uses, neighborhood-serving retail, restaurant uses, and a fitness facility, and would focus on pedestrian-friendly features to promote walkability and reduce the need for parking spaces.

As discussed in more detail on page 954–958 and shown on Table 48 in the Draft EIR, the proposed County Specific Plan requirements provide for equal or more parking than that required by the Los Angeles County Code. Under existing conditions, the parking that is available on-site is sufficient to meet the Project Site's existing parking demand via the implementation of the Applicant's site wide parking management program. This program takes advantage of the sharing of parking among uses that have daily and seasonal patterns that are complementary with regard to the sharing of parking. Further, a 24-hour parking demand analysis of the proposed Entertainment Area was conducted using the same methodology and data as was used for the existing parking demand analysis and concluded that the proposed parking supply within the County areas would be sufficient to meet the demand for the land uses. (See page 957 of the Draft EIR.)

As the County portions of the Project expand upon and reinforce the existing types and patterns of on-site land uses, new development would be supported by an expanded on-site parking supply based on the proposed County Specific Plan, and the Applicant or its successor would extend its current site-wide parking management program to include all proposed County land uses, it is anticipated that the planned expansion of the existing on-site parking supply would be sufficient to met the Project's parking demand. Therefore, a less than significant parking demand impact would result.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 13-6

Until these issues are specifically addressed, the Ventura/Cahuenga Boulevard Corridor Specific PRB recommends the City and County oppose granting any discretionary approvals. We also recommend that no amendments to the Ventura/Cahuenga Boulevard Corridor Specific Plan be approved.

Response to Comment No. 13-6

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 14

James J. McCarthy
Deputy District Director
Department of Transportation
District 7
100 S. Main St., Ste. 100
Los Angeles, CA 90012

[Note: A duplicate of the letter provided below was received on 2/8/11]

Comment No. 14-1

Caltrans would like to thank the City of Los Angeles for the opportunity to review the Draft Environmental Impact Report (DEIR) for the NBC Universal (NBCU) Evolution Plan. Also, Caltrans would like to thank NBCU for fostering a collaborative and innovative process for addressing the transportation impacts of the proposed plan.

During the Evolution Plan process, NBCU approached Caltrans with an interest to work together to comprehensively address the mobility needs of the US 101 corridor and not just impacts associated with the Evolution Plan. US 101 in this area is congested and a transportation challenge that the region has been wrestling with for decades. As a central corridor connecting the region, the need for mobility enhancements is extraordinary, but opportunity is limited. Consequently, when approached with the possibility of addressing a regional need, Caltrans agreed to work collaboratively with NBCU because we feel that it is a unique opportunity to make important safety and mobility improvements in this vital corridor.

Response to Comment No. 14-1

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 14-2

The proposed project consists of 1.56 million net new square feet of commercial use, a 500 room hotel, and a 2,937 unit residential dwelling. The applicant anticipates completion of the project by the year 2030.

The project will generate a net 36,451 additional average daily trips (ADT), 3,069 net AM trips, and 3,623 net PM trips. With the implementation of Transportation Demand Management (TDM), project vehicle trips would be reduced to approximately 28,108 ADT,

2,328 trips during the AM peak hour and 2,770 trips during the PM peak hour. In addition, the related projects in the project vicinity will generate 335,184 daily trips, 29,234 AM trips, and 39,529 PM trips.

Response to Comment No. 14-2

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 14-3

Although Caltrans does not generally use the Los Angeles County Congestion Management Plan (CMP) when analyzing State facilities, Caltrans agrees that the use of the CMP criteria in this case is appropriate given the nature of the project and the potential regional traffic impacts. Moreover, the NBCU team's early collaborative and proactive effort in working with Caltrans allowed the integration of Caltrans' requirements into the assumptions and methodology used for the traffic study. Also, NBCU has identified the Evolution Plan mitigation to address impacts on the state highway system. Therefore, Caltrans concurs with the proposed traffic methodology, modeling and impact assessment contained within the Evolution Plan traffic study.

The project proposes Regional and Sub-Regional Highway improvements to the US-101, including the interchange at Universal Terrace Parkway (Campo de Cahuenga Way) (for which a PSR has been approved), corridor improvements at Lankershim Blvd., Forest Lawn Drive, Universal Hollywood Drive, and Barham Blvd., Lakeside Plaza Drive and Buddy Holly Drive widening, the addition of a new north-south 4 lane road parallel to Barham Blvd [sic] through the NBCU property, and a new US-101 South Bound On-Ramp at Universal Studios Blvd. It is noted on Page 51 of Volume 1 DEIR that, "with implementation of the Project's proposed mitigation measures, the Project's significant impacts to these Los Angeles County Congestion Management Plan freeway segments would be reduced but would remain significant and unavoidable."

Response to Comment No. 14-3

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. As mentioned in the comment, the Draft EIR utilizes the Congestion Management Plan (CMP) impact criteria as agreed upon with Caltrans.

Comment No. 14-4

Caltrans acknowledges that the proposed identified mitigation would address the impacts of the proposed plan with the following requested modifications / clarifications:

US 101 Corridor Improvements – NBCU has proposed meaningful safety and mobility improvements in the US 101 corridor in addition to the proposed Evolution Plan mitigations. In recognition of the many challenges in the corridor, NBCU has proposed to collaborate and work with Caltrans to advance several potential improvements in order to leverage funding more effectively and provide the greatest benefit to the region. Caltrans concurs with this as an effective approach. It should be noted that NBCU and Caltrans have already begun by initiating efforts to complete the project study report (PSR) for improving safety and highway operations for the US 101 / SR 134 / SR 170 interchange. It is recommended NBCU and Caltrans work cooperatively to execute a memorandum of understanding in the near future to define and document roles and responsibilities for all of the proposed corridor improvements.

Response to Comment No. 14-4

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. As noted in Appendix E-1, Transportation Study, of the Draft EIR, the US 101 corridor improvements referenced in the comment are regional highway system improvements that are not part of the Project's mitigation measures. The improvements currently do not have committed funding, therefore, the traffic analysis of the Draft EIR conservatively assumes these improvements would not be in place in year 2030. Coordination between the Applicant and Caltrans is currently underway on the memorandum of understanding referenced in this comment. The commenter is also referred to Topical Response No. 6: Freeway Improvements (see Section III.C, Topical Responses, of this Final EIR).

Comment No. 14-5

Eastbound SR 134 Riverside/Vineland Off Ramp – This ramp is located within the US 101 / SR 134 / SR 170 interchange and can potentially be a viable alternative for local access to the Evolution Plan site. As part of the US 101 / SR 134 / SR 170 interchange PSR being prepared, NBCU should analyze whether modifications are needed at this ramp and if necessary include such modifications in the PSR.

Westbound SR 134 Forest Lawn Off Ramp – The project proposes installation of a traffic signal and widening at the off-ramp intersection. In order to address potential queuing along SR 134, it is requested that the project provide sufficient storage between Zoo Drive and Forest Lawn, which may result in an auxiliary lane.

Caltrans also requests that a PSR be completed for any proposed and/or physical improvements that serve to mitigate the impacted segments and on/off ramps.

Response to Comment No. 14-5

The Applicant agrees to analyze the SR 134 eastbound off-ramp at Riverside Drive/ Vineland Avenue and the SR 134 westbound off-ramp at Forest Lawn Drive as part of the Project Study Reports (PSRs) for the Project's ramp improvements required under Caltrans' analysis.

Comment No. 14-6

The US 101 is a significant artery in our region and Caltrans looks forward to working with NBCU to bring improvements to this corridor. If you have any questions, please feel free to contact me at (213) 897-0362. Thank you for the opportunity to comment on the Evolution Plan DEIR.

Response to Comment No. 14-6

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 15

Leslee Newton-Reed
Environmental Scientist
Department of Fish & Game
South Coast Region
4949 Viewbridge Avenue
San Diego, CA 92123

Comment No. 15-1

Thank you for your submittal of the CEQA document (Environmental Impact Report) and the extension of the public review period for the NBC Universal Evolution Plan project.

The Department of Fish and Game (Department) has determined that the project is not eligible for a no effect determination. Based on the documentation we have reviewed for the proposed project, the Department has determined that, for purposes of the assessment of CEQA filing fees [Fish and Game Code Section 711.4(c)], the project may or has the potential to affect fish and/or wildlife[1] (grading/ground disturbance and tree removal [California Code of Regulations, Title 14, §753.5(d)(2) and (3)]). Therefore, a CEQA filing fee of $2,839.25 for a Environmental Impact Report must be paid for the project upon filing of the Notice of Determination with the County Clerk (check made payable to the appropriate county clerk). In addition, the County Clerk may charge a processing fee.

A copy of the applicable statue [sic] and regulations are available on the Department web site (http://www.dfg.ca.gov/habcon/ceqa/ceqa_changes.html). Please contact me at (858) 467-4281 if you have any questions regarding this decision.

[1] *Fish and Game Code Section 711.2(a) For purposes of this code, unless the context otherwise requires, "wildlife" means and includes all wild animals, birds, plants, fish, amphibians, reptiles, and related ecological communities, including the habitat upon which the wildlife depends for its continued viability.*

Response to Comment No. 15-1

The comment refers to a CEQA filing fee that is due at the time of filing of the Notice of Determination for the final EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 16

John Shamma
Manager, Environmental Planning Team
The Metropolitan Water District
of Southern California
700 N. Alameda St.
Los Angeles, CA 90012

[Note: A duplicate of the letter provided below was received on 2/4/11]

Comment No. 16-1

Metropolitan Water District's comments on the NBC Universal Evolution Plan Draft EIR are attached for your consideration. If you have any questions, please contact me via email or at (213) 217-6364.

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Draft Environmental Impact Report (DEIR) for the proposed NBC Universal Evolution Plan (Project). The Project includes the development of an approximately 391-acre site located in the east San Fernando Valley near the north end of the Cahuenga Pass. This letter contains Metropolitan's response to the DEIR as a Responsible Agency.

Response to Comment No. 16-1

The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision makers prior to any action on the Project. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 16-2

According to the DEIR, water service is currently provided to the proposed Project Site by the Los Angeles Department of Water and Power (DWP), which is a member agency of Metropolitan. The proposed Project, alternatives, and proposed scenarios for detachment/annexation of land between the city and county of Los Angeles, all anticipate continued water supply service to be provided by DWP. See, e.g., DEIR § L.2 Utilities--Water. The estimated increases in potable water consumption for the Project range from 1,200 to 2,200 acre feet per year (DEIR at page 1876). The Project proponent also discusses plans to attempt to mitigate impacts to imported water supplies from DWP (and presumably Metropolitan) through future development of recycled water and the acquisition of adjudicated water rights from the Central and West Coast Basins to the extent these rights are available (DEIR at pages 1872-1877).

Response to Comment No. 16-2

The comment summarizes information from Section IV.L.2, Utilities – Water, and Appendix N-1-2, Water Supply Assessment, of the Draft EIR, regarding water services for the Project. As stated in the Draft EIR, the Project is estimated to increase water demand by an average of 1,249.1 acre-feet/year. The approximately 2,200 acre-feet/year referenced in the comment and noted in the Draft EIR is based on annualizing the peak daily flow rate. The peak flow rate is a multiple of the average demand that is used in designing piping and other infrastructure, but is not an accurate estimate of overall annual demand. The annualized peak flow rate overestimates annual demand by the multiplier used in calculating the peak rate. Further, as noted in the Draft EIR, the estimated water demand does not reflect reductions in water usage that would result from the water conservation measures included as project design features and described in Section IV.L.2, Utilities – Water, of the Draft EIR.

Water is supplied to the Project Site by the Department of Water and Power (DWP). The Los Angeles Aqueducts, local groundwater, purchased water from the Metropolitan Water District and recycled water are the primary sources of water supplies for DWP. In addition, as noted in the comment, to meet the water demands of the Project, the Applicant would augment the water supply available to DWP, pursuant to the terms of the Surplus Water Supply Augmentation Agreement between the Applicant and DWP. Under this agreement, the Applicant would provide water rights to DWP under certain circumstances provided for in the Surplus Water Supply Augmentation Agreement, thus increasing the water supply sources to which DWP has access. The Surplus Water Supply Augmentation Agreement contemplates that the water rights will be from the Central and/or West Coast Basins. As indicated in the Water Supply Assessment for the Project, the Central and West Coast Basins are adjudicated groundwater basins. Under the adjudications, DWP has specified, limited water rights in these basins. The water rights that the Applicant would provide DWP under the Surplus Water Supply Augmentation Agreement would be in addition to DWP's existing rights. As further noted in the Water Supply Assessment, there is an active groundwater rights sales and lease market in the Central and West Coast Basins. Based on the Water Supply Assessment, DWP determined that the Project demands could be offset through the purchase by the Applicant of annual adjudicated water rights in these basins.

Comment No. 16-3

Because the Project Site is not currently annexed to Metropolitan's Service Area, Metropolitan is concerned about increases in supply to this area without annexation. While the DEIR discusses the possibility of some partial annexation to the City of Los Angeles (DEIR at page 284), there is no mention of any intention to annex to Metropolitan. Any use

of or benefit provided from Metropolitan's imported supplies either directly or indirectly to the Project Site will require annexation.

The Project site is located in a "window" area, a currently unannexed portion completely surrounded by Metropolitan's service area (please see attached map). Under Metropolitan's Administrative Code Section 3104(b), "water sold and delivered by the District shall not be used in any manner which intentionally or avoidably results in the direct or indirect benefit of areas outside the District including use of such water outside the District or use thereof within the District in substitution for other water used outside the District." See also MWD Admin. Code § 4509 ("insur[ing] that water served by the District is not used for the direct or indirect benefit of areas outside the District"). In this case, Universal City and DWP both directly and indirectly benefit from Metropolitan's imported supplies. Metropolitan supplies are used to offset and reduce impacts to DWP's water supplies and local groundwater supplies used at Universal City. But for Metropolitan's imported supplies, local supplies would be reduced proportionally. DWP and other local suppliers have similar supply restrictions. See, e.g., LA City Charter § 67 & DWP Rule 3(A)(5) (prohibiting use of water outside the city unless it is surplus and not required for any use in the city).

Accordingly, annexation to Metropolitan and a member agency will be required to obtain water service for the proposed Project. Based on the Project location, several options are available to the Project proponent with respect to which of Metropolitan's member agencies they may annex to, including: (1) City of Los Angeles, (2) City of Burbank, or (3) West Basin Municipal Water District. As this would be a discretionary approval by Metropolitan and its member agencies, we request that the Final EIR describe the need for annexation and identify Metropolitan as a Responsible Agency that will need to rely upon the Final EIR for that approval. Please contact Ethel Young at (213) 217-7677 for information on Metropolitan's annexation process.

Response to Comment No. 16-3

As discussed in Section IV.L.2, Utilities – Water, of the Draft EIR, the Water Supply Assessment for the NBC Universal Evolution Plan Project included as Appendix N-1-2 to the Draft EIR, and the 2005 and 2010 Los Angeles Department of Water and Power Urban Water Management Plans, water is supplied to the Project Site by the Department of Water and Power. The Department of Water and Power has supplied water to the Project Site since approximately 1915. The existing Project Site water demands were accounted for in the water demands in the 2005 Urban Water Management Plan (see page 2 of the Water Supply Assessment).

Section II.P, Project Description – Other Project Approvals, of the Draft EIR, states that other actions by local, regional and state agencies may be required to implement the

proposed Project, including water supply agreements. The comment's request for additional information regarding the potential annexation has been incorporated in the Final EIR (see Corrections and Additions Nos. II.A and II.B, Section II, of the Final EIR).

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 16-4

Additionally, Metropolitan owns and operates a pipeline adjacent to the boundaries of the proposed project location. Metropolitan's Santa Monica Feeder pipeline is a 42-inch precast concrete pipe that runs along Barham Boulevard on the east side of the Project. Metropolitan also has a Permanent Easement located in the northeast corner of the site at Gate Four. Please see the attached map for the locations of Metropolitan's pipeline alignment.

Metropolitan is concerned with potential impacts to these pipeline facilities that may result from future excavation, construction, utilities, or any redevelopment activities under the proposed Project. Development and redevelopment associated with the proposed Project must not restrict any of Metropolitan's day-to-day operations and/or access to its facilities. Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by calling Metropolitan's Substructures Information Line at (213) 217-6564. To assist in preparing plans that are compatible with Metropolitan's facilities, easements, and properties, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or easements of The Metropolitan Water District of Southern California." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

Response to Comment No. 16-4

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. The Metropolitan Water District's easement is noted on the Project's proposed tentative tract map for that area of the Project Site. The Draft EIR notes that construction activities would be conducted so as not to interfere with any offsite subsurface infrastructure. However, to further address the comment, coordination with the Metropolitan Water District prior to subsurface construction activities in the area of Metropolitan's Santa Monica Feeder pipeline has been added as a project design feature (see Corrections and Additions No. IV.L.2.Q, Section II, of this Final EIR).

Comment No. 16-5

We appreciate the opportunity to provide input to your planning process and we look forward to further coordination on this Project. If you have any questions, please contact Dr. Marty Meisler at (213) 217-6364.

Response to Comment No. 16-5

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 16-6

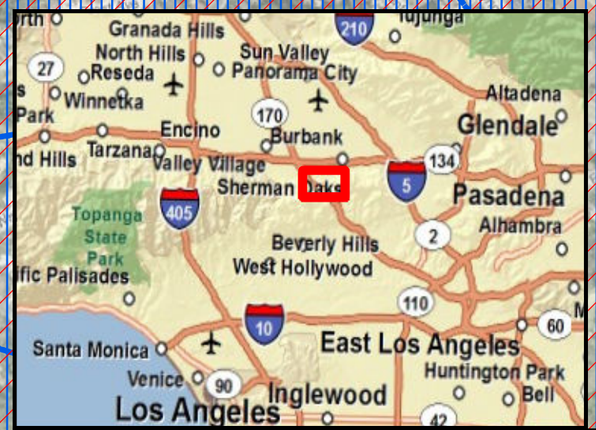
See next page

THIS EXHIBIT IS TO BE USED FOR APPROXIMATE POSITIONING ONLY.
IT IS NOT TO BE USED, NOR IS IT INTENDED TO BE USED FOR ENGINEERING, RECORDING OR LITIGATION PURPOSES. NO WARRANTY OF ACCURACY IS IMPLIED OR GUARANTEED.

Burbank

Santa Monica Feeder

Los Angeles



- NBC Universal Evolution Plan Outside Boundary
- City of Los Angeles Boundary
- LADWP Service Zone
- MWD Service Area

Projects\Annexations\GIS\Los_Angeles_County\NBC_Universal_Evolution_Plan.mxd [Printed 01/31/2011] Photography Date: None Prepared by: Enrique Chen (Right of Way Engineering Team) Checked by: Ethel Young Job#: GIS10-11-11

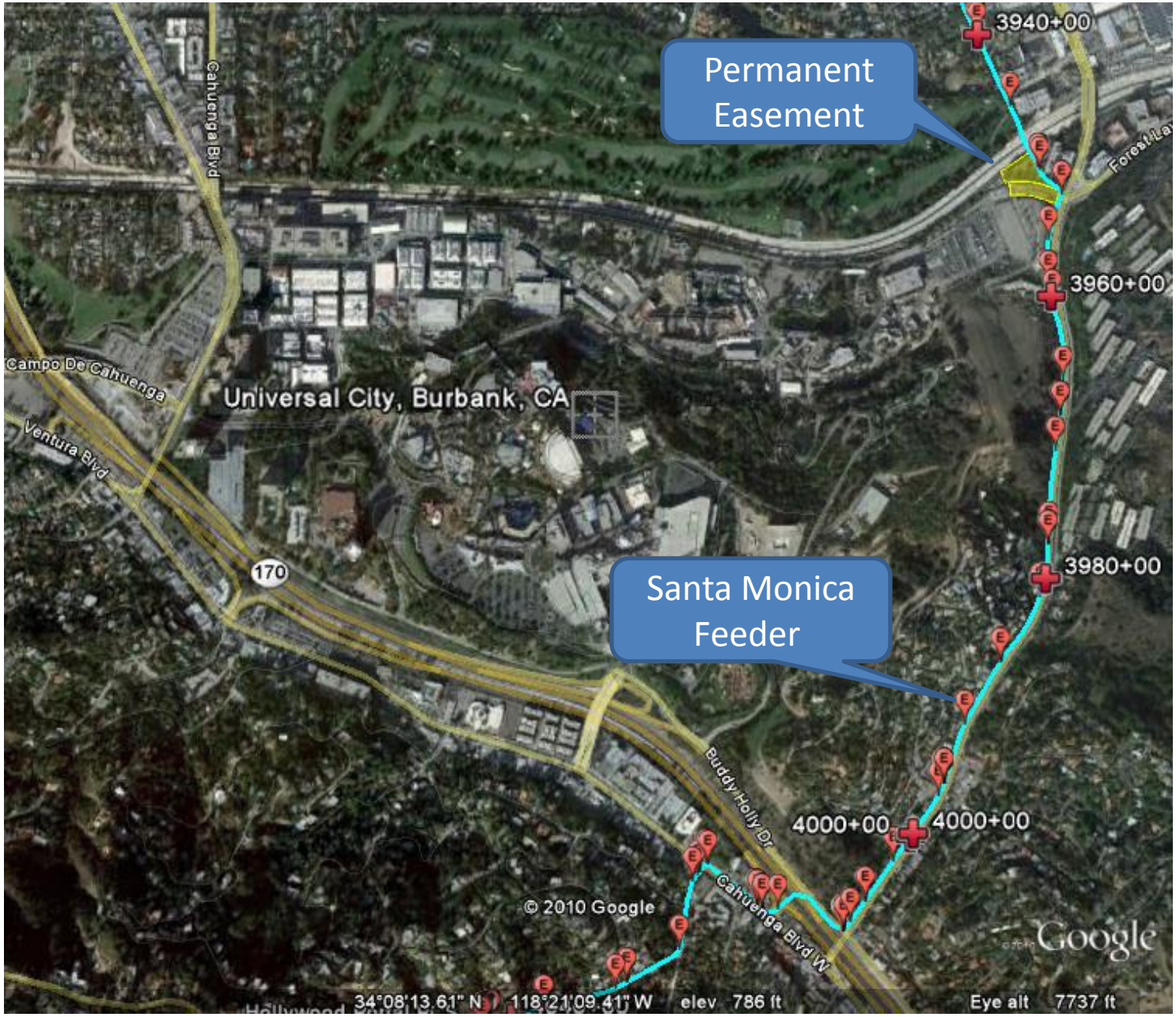
Response to Comment No. 16-6

The graphic is referenced in Comment No. 16-3. Please refer to Response to Comment No. 16-3, above.

Comment No. 16-7

See next page

Santa Monica Feeder



Response to Comment No. 16-7

The graphic is referenced in Comment No. 16-4. Please refer to Response to Comment No. 16-4, above.

Comment No. 16-8

See next page

Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California

1. Introduction

a. The following general guidelines should be followed for the design of proposed facilities and developments in the area of Metropolitan's facilities, fee properties, and/or easements.

b. We require that 3 copies of your tentative and final record maps, grading, paving, street improvement, landscape, storm drain, and utility plans be submitted for our review and written approval as they pertain to Metropolitan's facilities, fee properties and/or easements, prior to the commencement of any construction work.

2. Plans, Parcel and Tract Maps

The following are Metropolitan's requirements for the identification of its facilities, fee properties, and/or easements on your plans, parcel maps and tract maps:

a. Metropolitan's fee properties and/or easements and its pipelines and other facilities must be fully shown and identified as Metropolitan's on all applicable plans.

b. Metropolitan's fee properties and/or easements must be shown and identified as Metropolitan's with the official recording data on all applicable parcel and tract maps.

c. Metropolitan's fee properties and/or easements and existing survey monuments must be dimensionally tied to the parcel or tract boundaries.

d. Metropolitan's records of surveys must be referenced on the parcel and tract maps.

3. Maintenance of Access Along Metropolitan's Rights-of-Way

a. Proposed cut or fill slopes exceeding 10 percent are normally not allowed within Metropolitan's fee properties or easements. This is required to facilitate the use of construction and maintenance equipment, and provide access to its aboveground and belowground facilities.

b. We require that 16-foot-wide commercial-type driveway approaches be constructed on both sides of all streets crossing Metropolitan's rights-of-way. Openings are required in any median island. Access ramps, if necessary, must be at least 16-feet-wide. Grades of ramps are normally not allowed to exceed 10 percent. If the slope of an access ramp must exceed 10 percent due to the topography, the ramp must be paved. We require a 40-foot-long level area on the driveway approach to access ramps where the ramp meets the street. At Metropolitan's fee properties, we may require fences and gates.

c. The terms of Metropolitan's permanent easement deeds normally preclude the building or maintenance of structures of any nature or kind within its easements, to ensure safety and avoid interference with operation and maintenance of Metropolitan's pipelines or other facilities. Metropolitan must have vehicular access along the easements at all times for inspection, patrolling, and for maintenance of the pipelines and other facilities on a routine basis. We require a 20-foot-wide clear zone around all above-ground facilities for this routine access. This clear zone should slope away from our facility on a grade not to exceed 2 percent. We must also have access along the easements with construction equipment. An example of this is shown on Figure 1.

d. The footings of any proposed buildings adjacent to Metropolitan's fee properties and/or easements must not encroach into the fee property or easement or impose additional loading on Metropolitan's pipelines or other facilities therein. A typical situation is shown on Figure 2. Prints of the detail plans of the footings for any building or structure adjacent to the fee property or easement must be submitted for our review and written approval as they pertain to the pipeline or other facilities therein. Also, roof eaves of buildings adjacent to the easement or fee property must not overhang into the fee property or easement area.

e. Metropolitan's pipelines and other facilities, e.g. structures, manholes, equipment, survey monuments, etc. within its fee properties and/or easements must be protected from damage by the easement holder on Metropolitan's property or the property owner where Metropolitan has an easement, at no expense to Metropolitan. If the facility is a cathodic protection station it shall be located prior to any grading or excavation. The exact location, description and way of protection shall be shown on the related plans for the easement area.

4. Easements on Metropolitan's Property

a. We encourage the use of Metropolitan's fee rights-of-way by governmental agencies for public street and utility purposes, provided that such use does not interfere with Metropolitan's use of the property, the entire width of the property is accepted into the agency's public street system and fair market value is paid for such use of the right-of-way.

b. Please contact the Director of Metropolitan's Right of Way and Land Division, telephone (213) 250-6302, concerning easements for landscaping, street, storm drain, sewer, water or other public facilities proposed within Metropolitan's fee properties. A map and legal description of the requested easements must be submitted. Also, written evidence must be submitted that shows the city or county will accept the easement for the specific purposes into its public system. The grant of the easement will be subject to Metropolitan's rights to use its land for water pipelines and related purposes to the same extent as if such grant had not been made. There will be a charge for the easement. Please note that, if entry is required on the property prior to issuance of the easement, an entry permit must be obtained. There will also be a charge for the entry permit.

5. Landscaping

Metropolitan's landscape guidelines for its fee properties and/or easements are as follows:

a. A green belt may be allowed within Metropolitan's fee property or easement.

b. All landscape plans shall show the location and size of Metropolitan's fee property and/or easement and the location and size of Metropolitan's pipeline or other facilities therein.

c. Absolutely no trees will be allowed within 15 feet of the centerline of Metropolitan's existing or future pipelines and facilities.

d. Deep-rooted trees are prohibited within Metropolitan's fee properties and/or easements. Shallow-rooted trees are the only trees allowed. The shallow-rooted trees will not be permitted any closer than 15 feet from the centerline of the pipeline, and such trees shall not be taller than 25 feet with a root spread no greater than 20 feet in diameter at maturity. Shrubs, bushes, vines, and ground cover are permitted, but larger shrubs and bushes should not be planted directly over our pipeline. Turf is acceptable. We require submittal of landscape plans for Metropolitan's prior review and written approval. (See Figure 3).

e. The landscape plans must contain provisions for Metropolitan's vehicular access at all times along its rights-of-way to its pipelines or facilities therein. Gates capable of accepting Metropolitan's locks are required in any fences across its rights-of-way. Also, any walks or drainage facilities across its access route must be constructed to AASHTO H-20 loading standards.

f. Rights to landscape any of Metropolitan's fee properties must be acquired from its Right of Way and Land Division. Appropriate entry permits must be obtained prior to any entry on its property. There will be a charge for any entry permit or easements required.

6. Fencing

Metropolitan requires that perimeter fencing of its fee properties and facilities be constructed of universal chain link, 6 feet in height and topped with 3 strands of barbed wire angled upward and outward at a 45 degree angle or an approved equal for a total fence height of 7 feet. Suitable substitute fencing may be considered by Metropolitan. (Please see Figure 5 for details).

7. Utilities in Metropolitan's Fee Properties and/or Easements or Adjacent to Its Pipeline in Public Streets

Metropolitan's policy for the alinement of utilities permitted within its fee properties and/or easements and street rights-of-way is as follows:

a. Permanent structures, including catch basins, manholes, power poles, telephone riser boxes, etc., shall not be located within its fee properties and/or easements.

b. We request that permanent utility structures within public streets, in which Metropolitan's facilities are constructed under the Metropolitan Water District Act, be placed as far from our pipeline as possible, but not closer than 5 feet from the outside of our pipeline.

c. The installation of utilities over or under Metropolitan's pipeline(s) must be in accordance with the requirements shown on the enclosed prints of Drawings Nos. C-11632 and C-9547. Whenever possible we request a minimum of one foot clearance between Metropolitan's pipe and your facility. Temporary support of Metropolitan's pipe may also be required at undercrossings of its pipe in an open trench. The temporary support plans must be reviewed and approved by Metropolitan.

d. Lateral utility crossings of Metropolitan's pipelines must be as perpendicular to its pipeline alinement as practical. Prior to any excavation our pipeline shall be located manually and any excavation within two feet of our pipeline must be done by hand. This shall be noted on the appropriate drawings.

e. Utilities constructed longitudinally within Metropolitan's rights-of-way must be located outside the theoretical trench prism for uncovering its pipeline and must be located parallel to and as close to its rights-of-way lines as practical.

f. When piping is jacked or installed in jacked casing or tunnel under Metropolitan's pipe, there must be at least two feet of vertical clearance between the bottom of Metropolitan's pipe and the top of the jacked pipe, jacked casing or tunnel. We also require that detail drawings of the shoring for the jacking or tunneling pits be submitted for our review and approval. Provisions must be made to grout any voids around the exterior of the jacked pipe, jacked casing or tunnel. If the piping is installed in a jacked casing or tunnel the annular space between the piping and the jacked casing or tunnel must be filled with grout.

g. Overhead electrical and telephone line requirements:

1) Conductor clearances are to conform to the California State Public Utilities Commission, General Order 95, for Overhead Electrical Line Construction or at a greater clearance if required by Metropolitan. Under no circumstances shall clearance be less than 35 feet.

2) A marker must be attached to the power pole showing the ground clearance and line voltage, to help prevent damage to your facilities during maintenance or other work being done in the area.

3) Line clearance over Metropolitan's fee properties and/or easements shall be shown on the drawing to indicate the lowest point of the line under the most adverse conditions including consideration of sag, wind load, temperature change, and support type. We require that overhead lines be located at least 30 feet laterally away from all above-ground structures on the pipelines.

4) When underground electrical conduits, 120 volts or greater, are installed within Metropolitan's fee property and/or easement, the conduits must be incased in a minimum of three inches of red concrete. Where possible, above ground warning signs must also be placed at the right-of-way lines where the conduits enter and exit the right-of-way.

h. The construction of sewerlines in Metropolitan's fee properties and/or easements must conform to the California Department of Health Services Criteria for the Separation of Water Mains and Sanitary Services and the local City or County Health Code Ordinance as it relates to installation of sewers in the vicinity of pressure waterlines. The construction of sewerlines should also conform to these standards in street rights-of- way.

i. Cross sections shall be provided for all pipeline crossings showing Metropolitan's fee property and/or easement limits and the location of our pipeline(s). The exact locations of the crossing pipelines and their elevations shall be marked on as-built drawings for our information.

j. Potholing of Metropolitan's pipeline is required if the vertical clearance between a utility and Metropolitan's pipeline is indicated on the plan to be one foot or less. If the indicated clearance is between one and two feet, potholing is suggested. Metropolitan will provide a representative to assists others in locating and identifying its pipeline. Two-working days notice is requested.

k. Adequate shoring and bracing is required for the full depth of the trench when the excavation encroaches within the zone shown on Figure 4.

l. The location of utilities within Metropolitan's fee property and/or easement shall be plainly marked to help prevent damage during maintenance or other work done in the area. Detectable tape over buried utilities should be placed a minimum of 12 inches above the utility and shall conform to the following requirements:

1) Water pipeline: A two-inch blue warning tape shall be imprinted with:

"CAUTION BURIED WATER PIPELINE"

2) Gas, oil, or chemical pipeline: A two-inch yellow warning tape shall be imprinted with:

"CAUTION BURIED _____ PIPELINE"

3) Sewer or storm drain pipeline: A two-inch green warning tape shall be imprinted with:

"CAUTION BURIED _____ PIPELINE"

4) Electric, street lighting, or traffic signals conduit: A two-inch red warning tape shall be imprinted with:

"CAUTION BURIED _____ CONDUIT"

5) Telephone, or television conduit: A two-inch orange warning tape shall be imprinted with:

"CAUTION BURIED _____ CONDUIT"

m. Cathodic Protection requirements:

1) If there is a cathodic protection station for Metropolitan's pipeline in the area of the proposed work, it shall be located prior to any grading or excavation. The exact location, description and manner of protection shall be shown on all applicable plans. Please contact Metropolitan's Corrosion Engineering Section, located at Metropolitan's F. E. Weymouth Softening and Filtration Plant, 700 North Moreno Avenue, La Verne, California 91750, telephone (714) 593-7474, for the locations of Metropolitan's cathodic protection stations.

2) If an induced-current cathodic protection system is to be installed on any pipeline crossing Metropolitan's pipeline, please contact Mr. Wayne E. Risner at (714) 593-7474 or (213) 250-5085. He will review the proposed system and determine if any conflicts will arise with the existing cathodic protection systems installed by Metropolitan.

3) Within Metropolitan's rights-of-way, pipelines and carrier pipes (casings) shall be coated with an approved protective coating to conform to Metropolitan's requirements, and shall be maintained in a neat and orderly condition as directed by Metropolitan. The application and monitoring of cathodic protection on the pipeline and casing shall conform to Title 49 of the Code of Federal Regulations, Part 195.

4) If a steel carrier pipe (casing) is used:

(a) Cathodic protection shall be provided by use of a sacrificial magnesium anode (a sketch showing the cathodic protection details can be provided for the designers information).

(b) The steel carrier pipe shall be protected with a coal tar enamel coating inside and out in accordance with AWWA C203 specification.

n. All trenches shall be excavated to comply with the CAL/OSHA Construction Safety Orders, Article 6, beginning with Sections 1539 through 1547. Trench backfill shall be placed in 8-inch lifts and shall be compacted to 95 percent relative compaction (ASTM D698) across roadways and through protective dikes. Trench backfill elsewhere will be compacted to 90 percent relative compaction (ASTM D698).

o. Control cables connected with the operation of Metropolitan's system are buried within streets, its fee properties and/or easements. The locations and elevations of these cables shall be shown on the drawings. The drawings shall note that prior to any excavation in the area, the control cables shall be located and measures shall be taken by the contractor to protect the cables in place.

p. Metropolitan is a member of Underground Service Alert (USA). The contractor (excavator) shall contact USA at 1-800-422-4133 (Southern California) at least 48 hours prior to starting any excavation work. The contractor will be liable for any damage to Metropolitan's facilities as a result of the construction.

8. Paramount Right

Facilities constructed within Metropolitan's fee properties and/or easements shall be subject to the paramount right of Metropolitan to use its fee properties and/or easements for the purpose for which they were acquired. If at any time Metropolitan or its assigns should, in the exercise of their rights, find it necessary to remove any of the facilities from the fee properties and/or easements, such removal and replacement shall be at the expense of the owner of the facility.

9. Modification of Metropolitan's Facilities

When a manhole or other of Metropolitan's facilities must be modified to accommodate your construction or reconstruction, Metropolitan will modify the facilities with its forces. This should be noted on the construction plans. The estimated cost to perform this modification will be given to you and we will require a deposit for this amount before the work is performed. Once the deposit is received, we will schedule the work. Our forces will coordinate the work with your contractor. Our final billing will be based on actual cost incurred, and will include materials, construction, engineering plan review, inspection, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount.

10. Drainage

a. Residential or commercial development typically increases and concentrates the peak storm water runoff as well as the total yearly storm runoff from an area, thereby increasing the requirements for storm drain facilities downstream of the development. Also, throughout the year water from landscape irrigation, car washing, and other outdoor domestic water uses flows into the storm drainage system resulting in weed abatement, insect infestation, obstructed access and other problems. Therefore, it is Metropolitan's usual practice not to approve plans that show discharge of drainage from developments onto its fee properties and/or easements.

b. If water must be carried across or discharged onto Metropolitan's fee properties and/or easements, Metropolitan will insist that plans for development provide that it be carried by closed conduit or lined open channel approved in writing by Metropolitan. Also the drainage facilities must be maintained by others, e.g., city, county, homeowners association, etc. If the development proposes changes to existing drainage features, then the developer shall make provisions to provide for replacement and these changes must be approved by Metropolitan in writing.

11. Construction Coordination

During construction, Metropolitan's field representative will make periodic inspections. We request that a stipulation be added to the plans or specifications for notification of Mr. _____ of Metropolitan's Operations Services Branch, telephone (213) 250-____, at least two working days prior to any work in the vicinity of our facilities.

12. Pipeline Loading Restrictions

a. Metropolitan's pipelines and conduits vary in structural strength, and some are not adequate for AASHTO H-20 loading. Therefore, specific loads over the specific sections of pipe or conduit must be reviewed and approved by Metropolitan. However, Metropolitan's pipelines are typically adequate for AASHTO H-20 loading provided that the cover over the pipeline is not less than four feet or the cover is not substantially increased. If the temporary cover over the pipeline during construction is between three and four feet, equipment must restricted to that which

imposes loads no greater than AASHTO H-10. If the cover is between two and three feet, equipment must be restricted to that of a Caterpillar D-4 tract-type tractor. If the cover is less than two feet, only hand equipment may be used. Also, if the contractor plans to use any equipment over Metropolitan's pipeline which will impose loads greater than AASHTO H-20, it will be necessary to submit the specifications of such equipment for our review and approval at least one week prior to its use. More restrictive requirements may apply to the loading guideline over the San Diego Pipelines 1 and 2, portions of the Orange County Feeder, and the Colorado River Aqueduct. Please contact us for loading restrictions on all of Metropolitan's pipelines and conduits.

b. The existing cover over the pipeline shall be maintained unless Metropolitan determines that proposed changes do not pose a hazard to the integrity of the pipeline or an impediment to its maintenance.

13. Blasting

a. At least 20 days prior to the start of any drilling for rock excavation blasting, or any blasting, in the vicinity of Metropolitan's facilities, a two-part preliminary conceptual plan shall be submitted to Metropolitan as follows:

b. Part 1 of the conceptual plan shall include a complete summary of proposed transportation, handling, storage, and use of explosions.

c. Part 2 shall include the proposed general concept for blasting, including controlled blasting techniques and controls of noise, fly rock, airblast, and ground vibration.

14. CEQA Requirements

a. When Environmental Documents Have Not Been Prepared

1) Regulations implementing the California Environmental Quality Act (CEQA) require that Metropolitan have an opportunity to consult with the agency or consultants preparing any environmental documentation. We are required to review and consider the environmental effects of the project as shown in the Negative Declaration or Environmental Impact Report (EIR) prepared for your project before committing Metropolitan to approve your request.

2) In order to ensure compliance with the regulations implementing CEQA where Metropolitan is not the Lead Agency, the following minimum procedures to ensure compliance with the Act have been established:

a) Metropolitan shall be timely advised of any determination that a Categorical Exemption applies to the project. The Lead Agency is to advise Metropolitan that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.

b) Metropolitan is to be consulted during the preparation of the Negative Declaration or EIR.

c) Metropolitan is to review and submit any necessary comments on the Negative Declaration or draft EIR.

d) Metropolitan is to be indemnified for any costs or liability arising out of any violation of any laws or regulations including but not limited to the California Environmental Quality Act and its implementing regulations.

b. <u>When Environmental Documents Have Been Prepared</u>

If environmental documents have been prepared for your project, please furnish us a copy for our review and files in a timely manner so that we may have sufficient time to review and comment. The following steps must also be accomplished:

1) The Lead Agency is to advise Metropolitan that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.

2) You must agree to indemnify Metropolitan, its officers, engineers, and agents for any costs or liability arising out of any violation of any laws or regulations including but not limited to the California Environmental Quality Act and its implementing regulations.

15. <u>Metropolitan's Plan-Review Cost</u>

a. An engineering review of your proposed facilities and developments and the preparation of a letter response

giving Metropolitan's comments, requirements and/or approval that will require 8 man-hours or less of effort is typically performed at no cost to the developer, unless a facility must be modified where Metropolitan has superior rights. If an engineering review and letter response requires more than 8 man-hours of effort by Metropolitan to determine if the proposed facility or development is compatible with its facilities, or if modifications to Metropolitan's manhole(s) or other facilities will be required, then all of Metropolitan's costs associated with the project must be paid by the developer, unless the developer has superior rights.

b. A deposit of funds will be required from the developer before Metropolitan can begin its detailed engineering plan review that will exceed 8 hours. The amount of the required deposit will be determined after a cursory review of the plans for the proposed development.

c. Metropolitan's final billing will be based on actual cost incurred, and will include engineering plan review, inspection, materials, construction, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount. Additional deposits may be required if the cost of Metropolitan's review exceeds the amount of the initial deposit.

16. Caution

We advise you that Metropolitan's plan reviews and responses are based upon information available to Metropolitan which was prepared by or on behalf of Metropolitan for general record purposes only. Such information may not be sufficiently detailed or accurate for your purposes. No warranty of any kind, either express or implied, is attached to the information therein conveyed as to its accuracy, and no inference should be drawn from Metropolitan's failure to comment on any aspect of your project. You are therefore cautioned to make such surveys and other field investigations as you may deem prudent to assure yourself that any plans for your project are correct.

17. Additional Information

Should you require additional information, please contact:

Civil Engineering Substructures Section
Metropolitan Water District
of Southern California
P.O. Box 54153
Los Angeles, California 90054-0153
(213) 217-6000

JEH/MRW/lk

Rev. January 22, 1989

Encl.

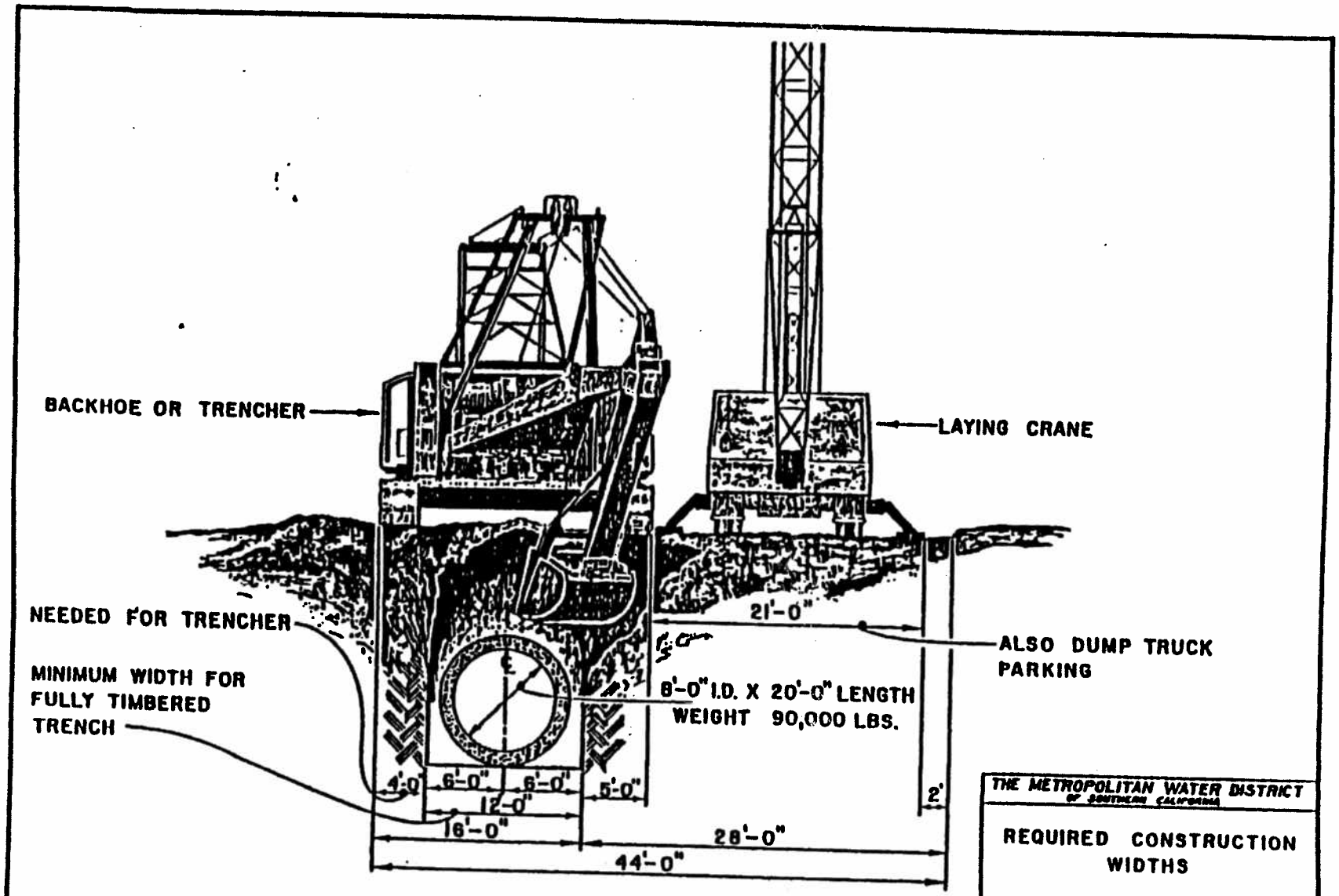
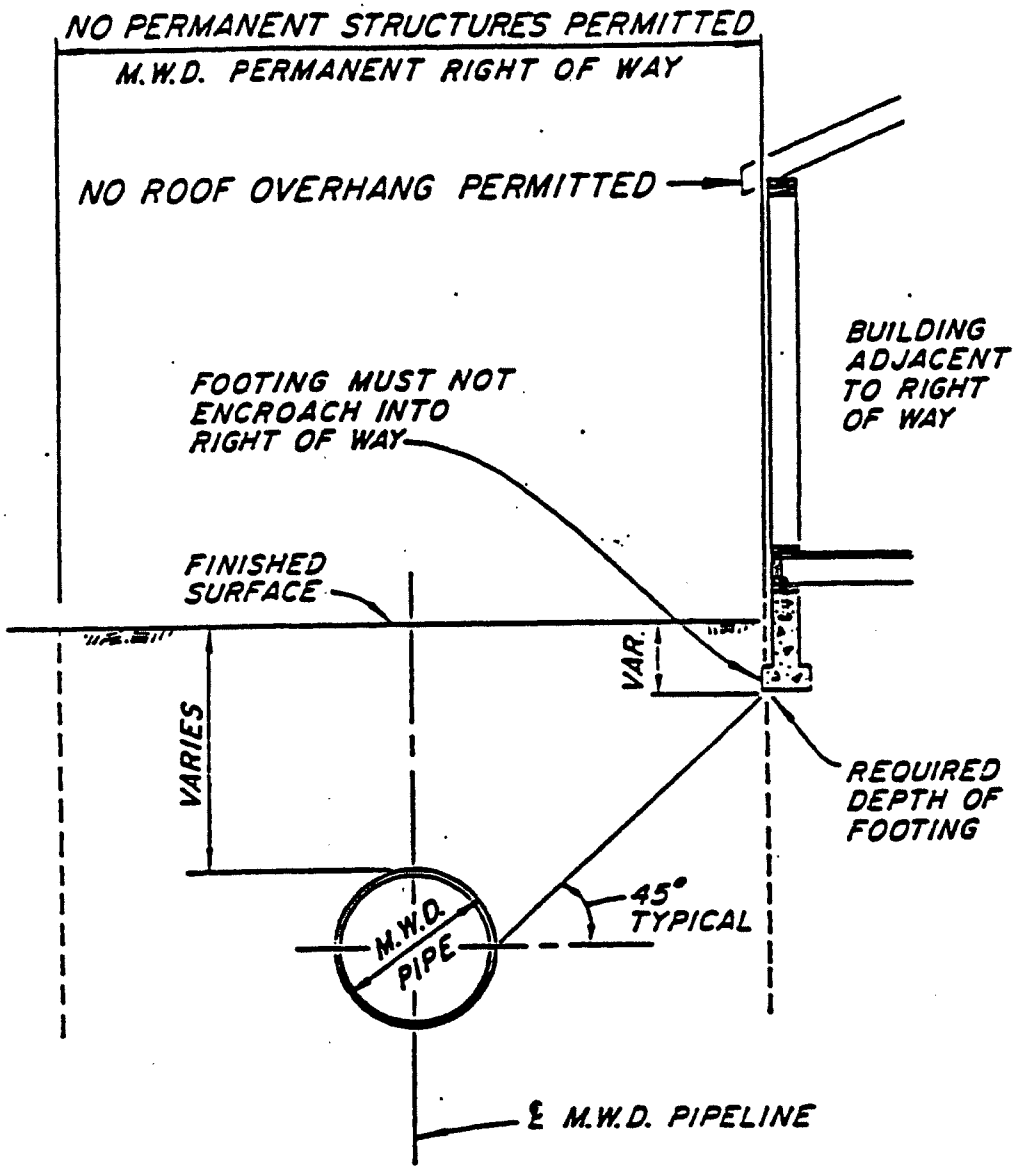

BACKHOE OR TRENCHER
LAYING CRANE
NEEDED FOR TRENCHER
MINIMUM WIDTH FOR
FULLY TIMBERED
TRENCH
8'-0" I.D. X 20'-0" LENGTH
WEIGHT 90,000 LBS.
21'-0"
ALSO DUMP TRUCK
PARKING
4'-0"
6'-0"
6'-0"
5'-0"
12'-0"
16'-0"
28'-0"
44'-0"
2'
THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA
REQUIRED CONSTRUCTION
WIDTHS
DRAWN
TRACED
CHECKED
RECOMMENDED
APPROVED

FIGURE 1



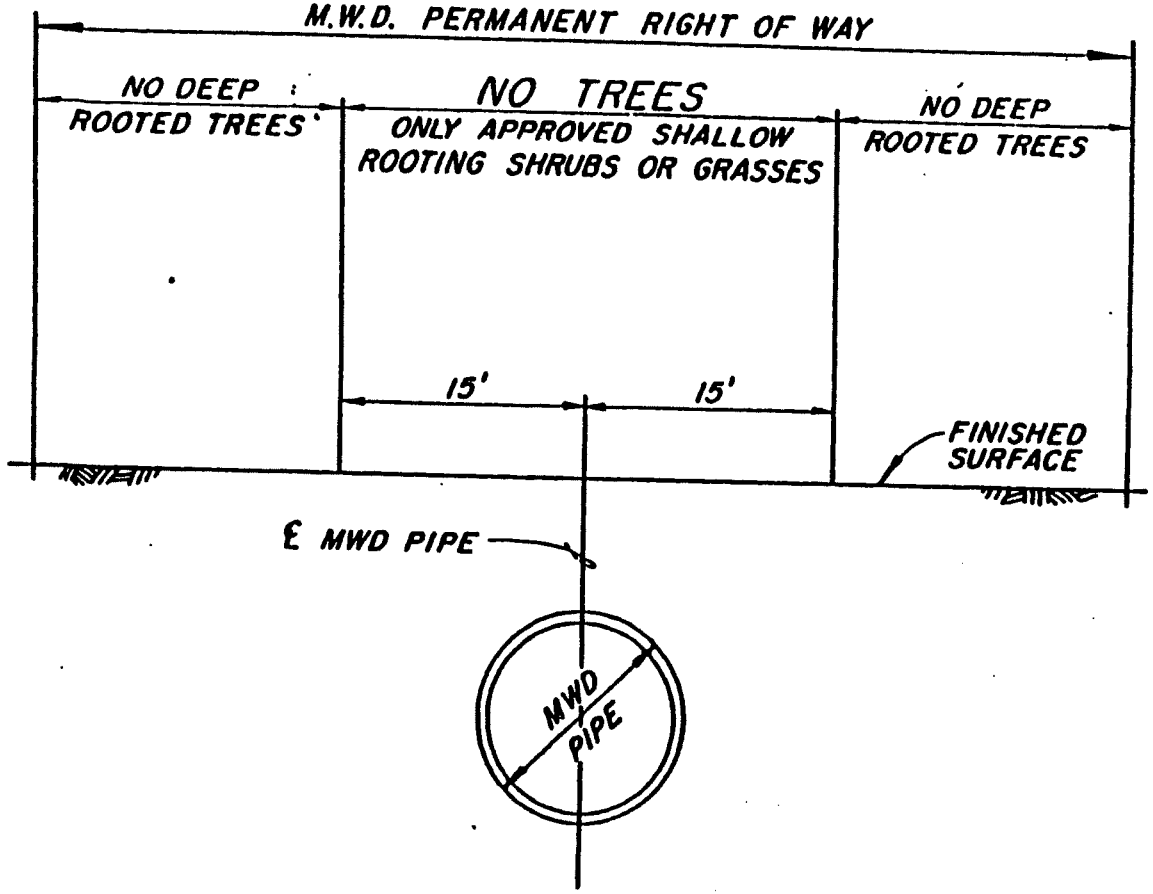
NOTE: M.W.D. PIPELINE SIZE, DEPTH, LOCATION AND WIDTH OF PERMANENT RIGHT OF WAY VARIES.

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

REQUIREMENTS FOR BUILDINGS AND FOOTINGS ADJACENT TO M.W.D. RIGHT OF WAY

DRAWN _____ RECOMMENDED _____
TRACED _____
CHECKED _____ APPROVED _____

FIGURE 2



THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

LANDSCAPE GUIDELINES FOR M.W.D. RIGHT OF WAY

DRAWN ..... RECOMMENDED .....
TRACED ..... RECOMMENDED .....
CHECKED ..... APPROVED .....

FIGURE 3

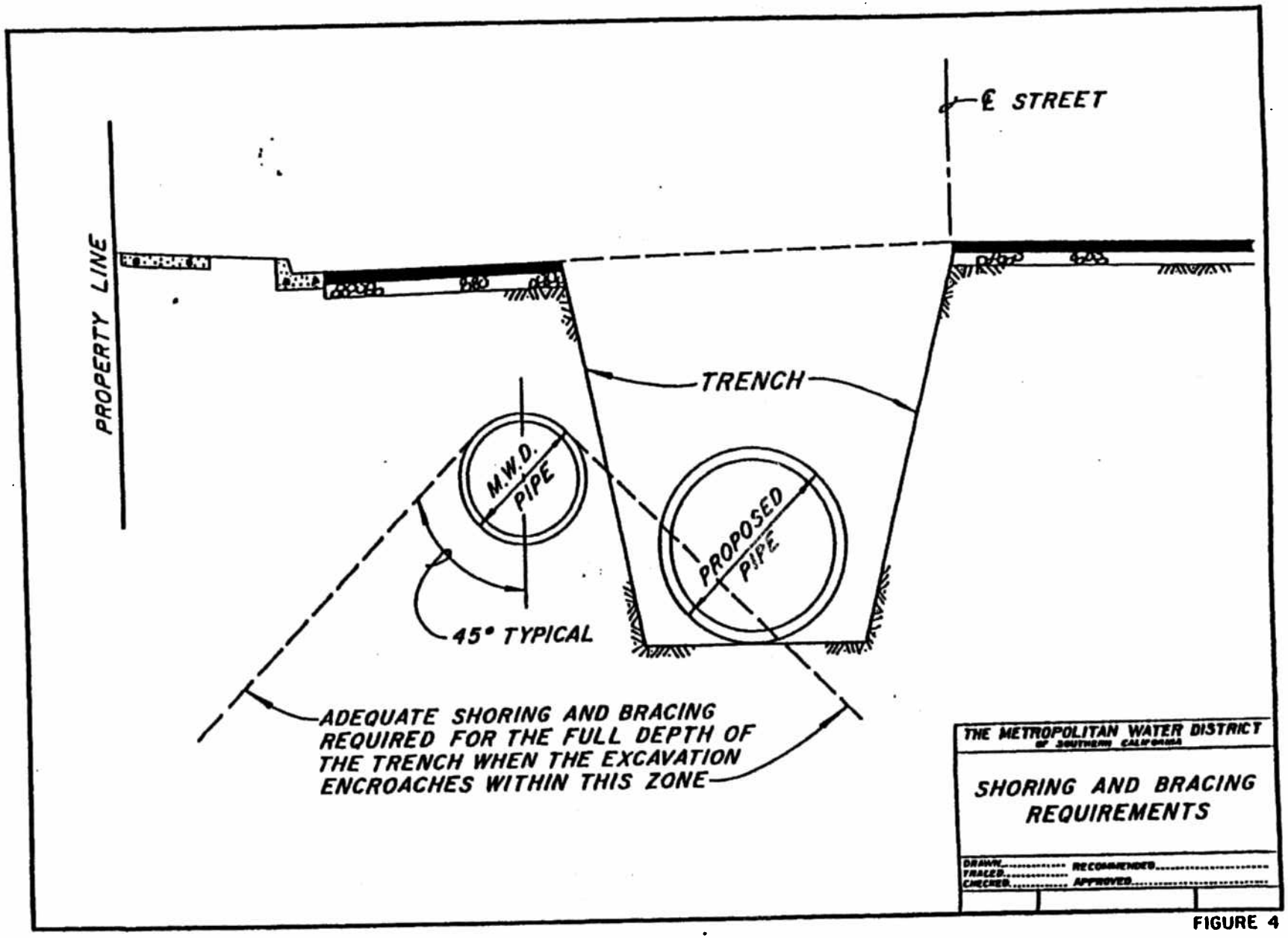
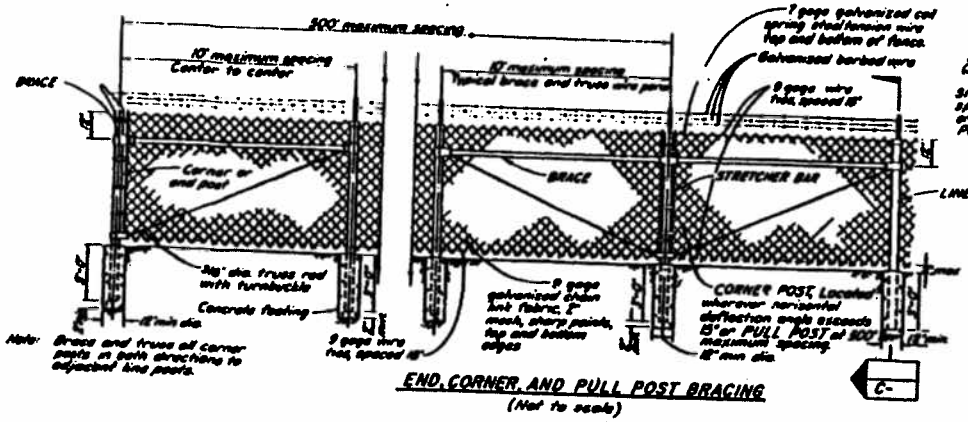
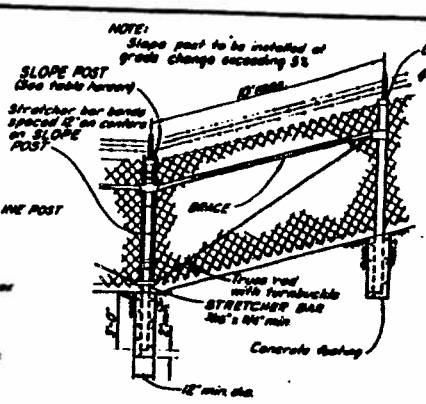

℄ STREET
PROPERTY LINE
TRENCH
M.W.D. PIPE
PROPOSED PIPE
45° TYPICAL
ADEQUATE SHORING AND BRACING REQUIRED FOR THE FULL DEPTH OF THE TRENCH WHEN THE EXCAVATION ENCROACHES WITHIN THIS ZONE
THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA
SHORING AND BRACING REQUIREMENTS
DRAWN
TRACED
CHECKED
RECOMMENDED
APPROVED

FIGURE 4

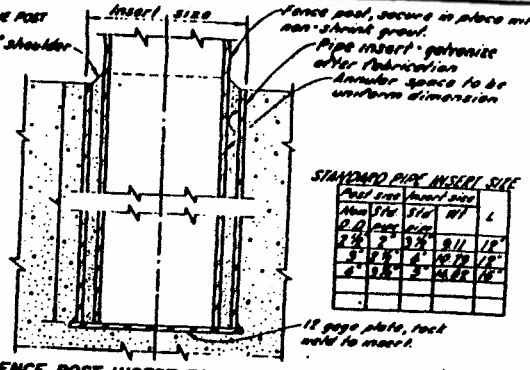
SPECIFICATIONS NO. SHEET NO.



END, CORNER, AND PULL POST BRACING
(Not to scale)



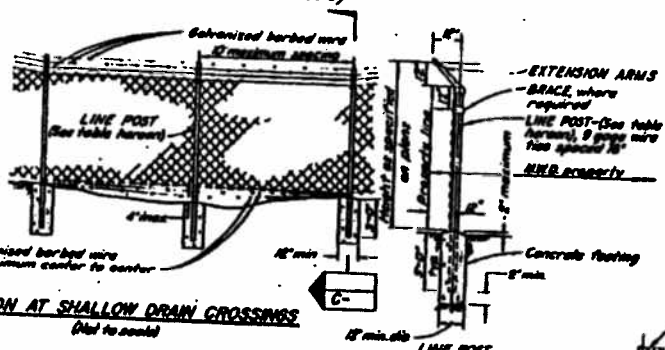
TYPICAL FENCE ON SLOPE
(Not to scale)



STANDARD PIPE INSERT SIZE

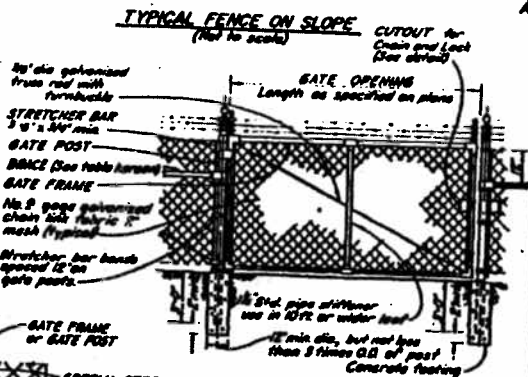
Post size	Insert size		
Nom. O.D.	Size pipe	WT	L
2½"	2"	3.5#	8 11
3"	2½"	4"	10 79
4"	3½"	5"	14 62

FENCE POST INSERT FOR CONCRETE WALL AND CONCRETE CURB
(Not to scale)

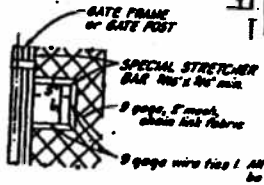


ELEVATION AT SHALLOW DRAIN CROSSINGS
(Not to scale)

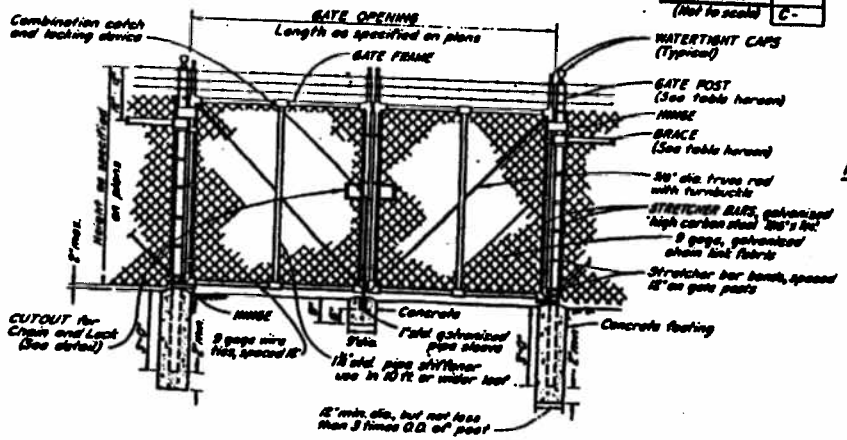
LINE POST SECTION
(Not to scale) C-



SINGLE SWING GATE DETAIL
(Not to scale)



DETAIL OF CUTOUT FOR CHAIN AND LOCK
(Not to scale)



DOUBLE SWING GATE DETAIL
(Not to scale)

GENERAL NOTES

1. All ferrous parts and materials shall be galvanized after fabrication
2. Adjustable tightening shall be turnbuckle or equivalent, having minimum 6" take-up
3. Extension arms for barbed wire shall be steel, malleable iron or wrought iron and shall be attached to the top of the post with a ½ inch round head rivet. The extension arms shall carry three wires each at approximately 6 inch centers in a plane approximately 45° from the vertical.
4. All gate hinges shall be heavy duty malleable iron or steel, industrial service type, 180 degree swing, of approved quality and design.
5. Secure cap to post with ½ inch round head rivet

Use	Type	Nominal Size (Inches)	Actual O.D. (Inches)	Weight per foot (Pounds)
End, corner, slope, pull and gate posts for single gates 6 feet or less in width and double gates 12 feet or less in width for chain link fabric 72 inches or higher	Pipe	2½	2.875	3.79
End, corner, slope, pull and gate posts for single gates 6 feet or less in width and double gates 12 feet or less in width for chain link fabric less than 72 inches height	Pipe	2	2.375	3.65
Gate posts for single swing gates over 6 feet but not over 13 feet in width and double swing gates over 12 feet but not over 36 feet in width.	Pipe	3½	4.000	9.11
Gate posts for single swing gates over 13 feet but not over 18 feet in width and double swing gates over 36 feet but not over 36 feet in width.	Pipe	6	6.625	18.97
Gate posts for single swing gates over 18 feet in width and double swing gates over 36 feet in width	Pipe	8	8.625	24.70
Line posts for chain link fabric 72 inches or higher	Pipe	2	2.375	3.65
	H-Sec-tion	6x6x½	1 lb	4.10
Line posts for chain link fabric .ess than 72 inches in height	Pipe	1¼	1.800	2.72
	H-Sec-tion	1½x1	1 lb	2.90
Braces	Pipe	1¼	1.800	2.27
	H-Sec-tion	1½x1	1 lb	2.90
Fittings for gates	Pipe	1¼	1.800	2.72
Stiffeners for gates	Pipe	1¼	1.800	2.27

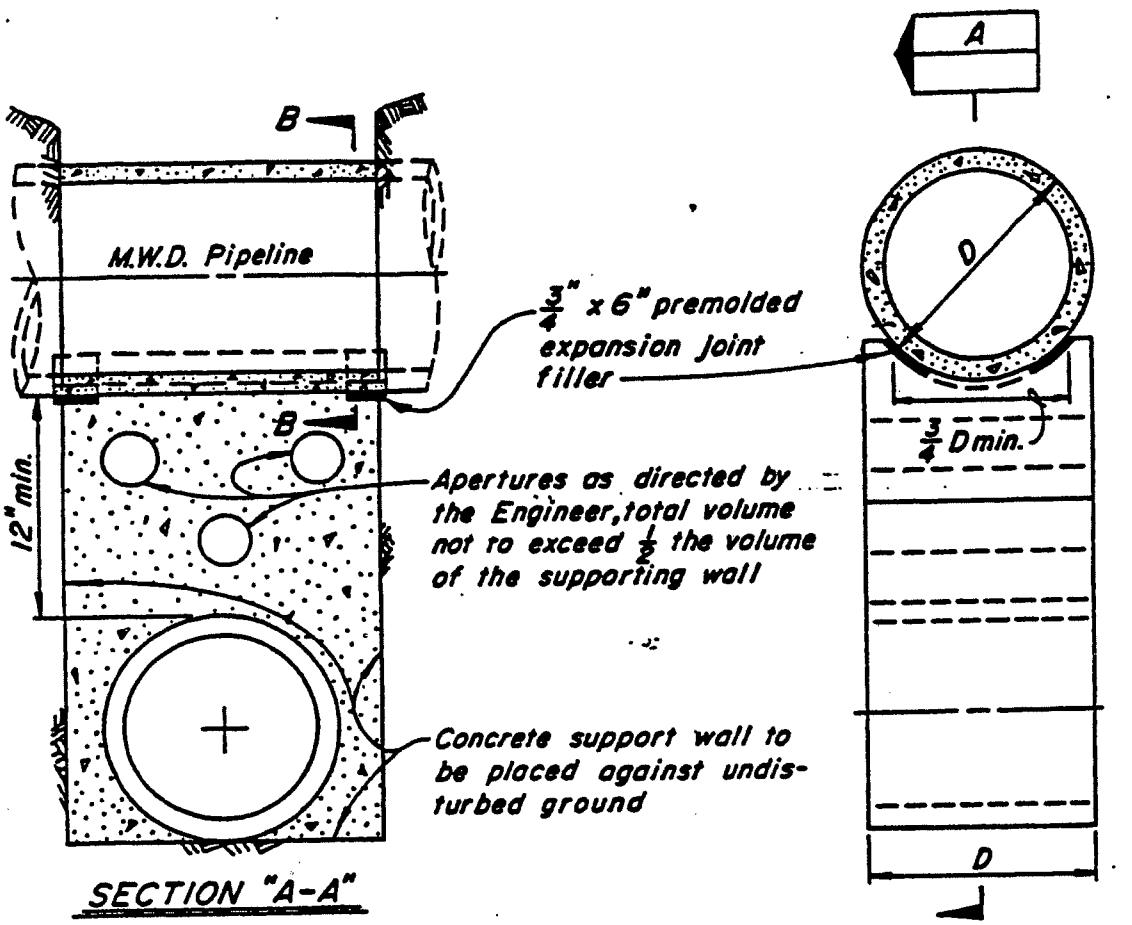
REVISED, CORRECTION DATED	INITIAL	DRAWN	CHK.	SPECS.	DATE
INTERDISTRICTAL COMBINATION CHECK					

NO.	DAN	DWN.	CKD.	REVISION	MIC.	APP.

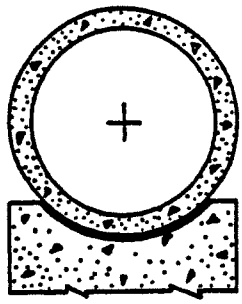
THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA
DISTRIBUTION SYSTEM

CHAIN LINK FENCE DETAILS

DESIGNED RECOMMENDED
DRAWN
CHECKED APPROVED
WORK ORDER NO. SOIL ANCHORS



1. Supporting wall shall have a firm bearing on the subgrade and against the side of the excavation.
2. Premolded expansion joint filler per ASTM D-1751-73 to be used in support for steel pipe only.
3. If trench width is 4 feet or greater, measured along centerline of M.W.D. pipe, concrete support must be constructed.
4. If trench width is less than 4 feet, clean sand backfill, compacted to 90% density in accordance with the provisions of ASTM Standard D-1557-70 may be used in lieu of the concrete support wall.



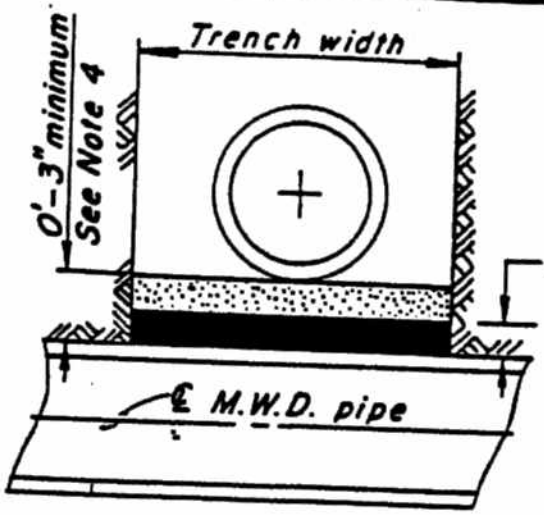
SECTION "B-B"

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

TYPICAL SUPPORT FOR M.W.D. PIPELINE

DRAWN _____ RECOMMENDED _____
TRACED _____
CHECKED _____ APPROVED _____

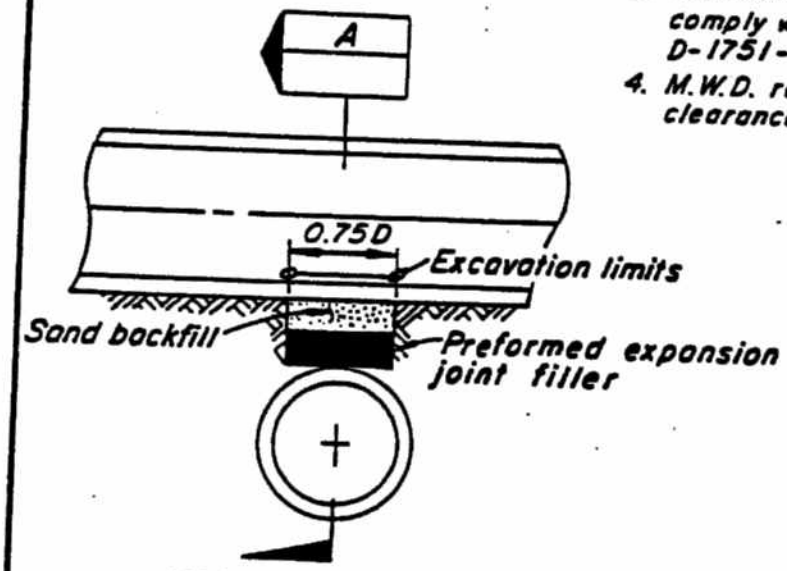
C-9547



SECTION A

NOTES

1. This method to be used where the utility line is 24" or greater in diameter and the clearance between the utility line and M.W.D. pipe is 12" or less.
2. Special protection may be required if the utility line diameter is greater than M.W.D. pipe or if the cover over the utility line to the street surface is minimal and there is 12" or less clearance between M.W.D. pipe and the utility line.
3. Preformed exponsion joint filler to comply with ASTM designation D-1751-73.
4. M.W.D. requests 12" minimum clearance whenever possible.



CROSS SECTION

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

TYPICAL EXPANSION JOINT FILLER PROTECTION FOR OVERCROSSING OF M.W.D. PIPELINE

DRAWN _____ RECOMMENDED _____
TRACED _____
CHECKED _____ APPROVED _____

C-11632

11-67 DIETZGEN-POST CLEARPRINT 1025

Response to Comment No. 16-8

The guidelines are referenced in Comment No. 16-4. Please refer to Response to Comment No. 16-4, above.

Comment Letter No. 17

Antonio Gonzalez
Chairperson
Santa Monica Mountains Conservancy
5750 Ramierez Canyon Rd.
Malibu, CA 90265

[Note: A duplicate of the letter provided below was received on 1/27/11]

Comment No. 17-1

Please find attached the Santa Monica Mountains Conservancy's comments regarding the DEIR for the NBC Universal Evolution project.

The Santa Monica Mountains Conservancy (Conservancy) is responsible for open space planning in the Santa Monica Mountains Zone, which abuts the subject project on its southwest and southeast sides. Along with our joint powers partner, the Mountains Recreation and Conservation Authority (MRCA), the Conservancy is one of the principal agencies involved with the revitalization of the Los Angeles River. As part of a regional growth management strategy, the Conservancy is generally supportive of infill development that accommodates residential and commercial uses in already urbanized areas. The Universal City site is ideal due to its proximity to existing transportation infrastructure (Metro Red Line and Hollywood Freeway) and status as a regional jobs center. However, the Conservancy strongly objects to two major configurations of the project footprint.

Response to Comment No. 17-1

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 17-2

The first major objection is the proposed project's treatment of the Los Angeles River corridor. Without substantial changes, the project is inconsistent with the County LA River Master Plan, City LA River Revitalization Master Plan, adopted City Bicycle Transportation Account compliance document, and draft City and County Bicycle Plans. The project would create an unnecessary gap in the City and County's vision for a 51-mile greenway along the river corridor and compromise this strategic vision for watershed sustainability.

Response to Comment No. 17-2

As explained on pages 418–419 in Section IV.A.1, Land Use – Land Use Plans/ Zoning, of the Draft EIR, the northeastern portion of the Project Site that abuts the Los Angeles River Flood Control Channel is within the jurisdiction of the City of Los Angeles. The remaining approximately three-fourths of the northern edge of the Project Site is adjacent to River Road, a two lane roadway that runs along the Los Angeles River Flood Control Channel. The majority of this northern edge is within the jurisdiction of the County of Los Angeles and the majority of the River Road roadway is owned by the Los Angeles County Flood Control District.

As stated on pages 417–418 in Section IV.A.1, Land Use – Land Use Plans/Zoning of the Draft EIR, the County completed the Los Angeles River Master Plan in 1996 and reissued it in 2005. The Project Site is located in Reaches 4 and 5 of the Los Angeles River Master Plan. Improvements identified in the Plan include tree plantings, a trail adjacent to the Los Angeles River Flood Control Channel and a pedestrian/bicycle path connection to Universal CityWalk. As stated on page 431 of the Draft EIR, in 2007, the City adopted the Los Angeles River Revitalization Master Plan as a vision document constituting the framework within which all future river related development within the City will be implemented. The Los Angeles River Revitalization Master Plan establishes the goal of creating a continuous 32-mile long river greenway along the Los Angeles River Flood Control Channel that would provide a dedicated bicycle path on the south and west side of the river and multiuse trail on the north and east sides of the Los Angeles River Flood Control Channel. The Project Site is located in the Los Angeles River Flood Control Channel Reach 4: Tujunga Wash to Barham Boulevard. The Los Angeles River Revitalization Master Plan identifies opportunities for revitalization and enhancement of the Los Angeles River Flood Control Channel along Forest Lawn Drive and at Weddington Park (North) and Weddington Park (South), to the east and west of the proposed Project Site, respectively.

In addition, the 2011 County Draft Bicycle Master Plan includes a "Los Angeles River Proposed Bicycle Path," a proposed Class 1 Bike Path along the Los Angeles River Flood Control Channel from Lankershim Boulevard to Barham Boulevard. This proposed bike path is identified in the plan as a low priority project (Table I-4 of the County Draft Bicycle Master Plan). Further, as noted on page 428 of the Draft EIR, the City Bicycle Plan proposes a bike path along the Los Angeles River Flood Control Channel, including the area of the Project Site. The City's Bicycle Plan was adopted in March 2011.

As stated in the Draft EIR, the Applicant will cooperate with the County, City, and other agencies, as necessary, to accommodate the future use of the County land along the Los Angeles River Flood Control Channel for public use as contemplated by the County

River Master Plan, and to continue use, if allowed by the County, of a portion of the River Road for studio access. In addition, the Project, as shown in Figure 21 on page 336 of the Draft EIR, includes the pedestrian/bicycle connection through the Project Site to CityWalk, as contemplated by the County River Master Plan. This internal circulation is not proposed as a substitute for the path along the Los Angeles River Flood Control Channel. Further, in the northeastern portion of the Project Site that is within the City's jurisdiction and owned by the Applicant, the Project proposes a River Trailhead Park that would provide access to the Los Angeles River Flood Control Channel, and connect the existing bike path along Forest Lawn Drive and the proposed bike path along the proposed North-South Road. If the County implements a public path on the County-owned portion of the Los Angeles River Flood Control Channel frontage, that path could be connected to the proposed River Trailhead Park and the internal bike path along the North-South Road. Therefore, the Project would not create a gap in the public path proposed along the Los Angeles River Flood Control Channel in the referenced City and County plans.

As explained in more detail on pages 496–497 and 523–524 of the Draft EIR, with these and other project design features, the Project furthers the goals and objectives of, and would not be inconsistent with, the Los Angeles River Master Plan and the Los Angeles River Revitalization Master Plan. Similarly, the Project would not be inconsistent with the County Draft Bicycle Plan or City Bicycle Plan proposals for a bike path along the Los Angeles River Flood Control Channel.

Comment No. 17-3

The second major concern is the lack of meaningful open space preservation along the project's southern boundary. The project retains little to no natural topography or open space capable of supporting native wildlife. By allowing conflicting uses in proposed open space districts, even the minimal acreage offered fails to protect biological resources.

As detailed below, the proposed project fails to meet goals and objectives of multiple applicable City and County plans. The applicant must revise the proposal to attain consistency with these plans. Doing so will likely change the nature of the proposed project significantly, potentially requiring a recirculated Draft Environmental Impact Report (DEIR) to adequately analyze the impacts of the revised project, particularly in relation to the Los Angeles River. It is unfortunate that the applicant did not address these issues satisfactorily to avoid these circumstances.

Response to Comment No. 17-3

The southern edge of the Project Site, as shown in Figure 3 on page 5 of the Draft EIR, currently consists of, from east to west, a landscaped area along Barham Boulevard, undeveloped area along Buddy Holly Drive, theme park support space and parking areas

with steep slopes adjacent to the 101 Freeway and off-site hotel and office development. Under the proposed Project, Open Space District 2 would replace the landscaped area and parts of the undeveloped portion in the southeastern edge of the Project Site. The landscaped slope along the 101 Freeway and Buddy Holly Drive would also be retained. Based on these factors the sense of open space along the Project Site's southern edge would be retained. These conclusions are also reflected by the Project's Conceptual Plan (Figure 13 on page 288 of the Draft EIR) which shows that most of the Project Site's southern edge would be maintained as open space.

As discussed in Section IV.I, Biota, of the Draft EIR, with the exception of a small fragment of sumac scrub near the southeast corner of the Project Site, the southern edge of the Project Site supports no areas of native habitat under current conditions. Because of the proximity to U.S. 101 immediately adjacent to the Project Site, the southern portion of the Project Site exhibits very limited potential for supporting native species other than those that are adapted to the existing road noise and lighting. Further, many of the existing species on the Project Site are highly adapted to the urban environment (e.g., opossum, raccoon, and coyote), while others are adapted to the urban edge and thrive at the urban edge due to dietary subsidies commonly associated with such settings. In the post-Project condition, it is expected that all of these species would continue to persist on the Project Site. It is also important to note that most of these species do not have any protected or special status and therefore, given the existing highly fragmented character of the Project Site, impacts to these species would not be considered significant pursuant to CEQA.

Specific comments regarding meeting goals and objectives of applicable plans are provided and responded to below. Furthermore, as discussed in Topical Response No. 2: Adequacy of the Draft EIR (see Section III.C, Topical Responses, of this Final EIR), the Project does not meet any of the criteria for recirculation. For these reasons there is no need to revise the proposed Project pursuant to applicable plans and there is no basis under CEQA that requires the recirculation of the Draft EIR.

Comment No. 17-4

Inappropriate Treatment of Los Angeles River Corridor

The current proposal turns its back on the river and precludes public access to this regional resource. While recognizing the design constraints due to the existing site layout, the applicant did not adequately consider implementation of the river greenway. The very language of the environmental document denigrates the efforts of the community groups, civic leaders, and public agencies that have invested in the river corridor. In deference to the revitalization efforts, the Los Angeles River should be referred to as just that, and not the "Los Angeles River Flood Control Channel" as used throughout the DEIR.

Response to Comment No. 17-4

As stated in Response to Comment No. 17-2, the Project proposes a River Trailhead Park that would provide access to the Los Angeles River Flood Control Channel for the northeastern portion of the Project Site that is owned by the Applicant. For those areas along the Los Angeles River Flood Control Channel that are under the ownership of the County of Los Angeles, the Project does not preclude the implementation of a bicycle path along the Los Angeles River Flood Control Channel by the County or another entity. Moreover, as stated on page 496 of the Draft EIR, the Project includes requirements to incorporate appropriate visual treatment, such as articulation or landscape buffering, of new buildings facing the river and limitations on signage along the northern Project Site edge.

With regard to the issue of nomenclature, as stated on page 1335 of the Draft EIR, the Los Angeles River runs past the Project Site within the concrete-lined Los Angeles River Flood Control Channel. As such, the Draft EIR references this component of the regional infrastructure system as the Los Angeles River Flood Control Channel.

Comment No. 17-5

Along these same lines, although the proposed Trailhead Park is a genuinely good idea, its name connotes the idea that the Los Angeles River Greenway terminates there, rather than it being a node for local nonmotorized access to the river path. The proposed park does not magically replace the need for regional bicycle mobility, which can only be provided by a grade-separated, continuous bike path along the river, as envisioned in both the County's LA River Master Plan and the City's LA River Revitalization Master Plan. As proposed, Trailhead Park is just an amenity for Universal City residents with secondary value for greenway users.

Response to Comment No. 17-5

The proposed Trailhead Park, which is envisioned as a multi-use, multi-purpose recreational facility, would likely serve all of the functions described in the comment, particularly in the event that the County or another entity implement a bike path in this area (see Response to Comment No. 17-2). The proposed Trailhead Park would be open to the public and not just an amenity for Project residents as suggested in the comment. Also as stated in Response to Comment No. 17-2, above, the development of the proposed Project would not preclude public access to the Los Angeles River Flood Control Channel or be inconsistent with the implementation of the referenced City and County plans.

Comment No. 17-6

Bicycle Access and Circulation Inadequately Detailed

The proposed internal network for bicycle circulation is too vague for the public to understand what is actually being proposed. The DEIR regularly confuses bike paths and lanes, with no defined standards for either. Given that the applicant proposes to replace a significant section of Class I grade-separated bike path with an undefined combination of Class II bike lanes and circuitous at-grade paths, these distinctions are essential for evaluating the project's merits. The Conservancy would not ordinarily be concerned with this level of detail, however since the applicant intends to substitute this internal network for a section of regionally planned greenway, the quality of this infrastructure becomes critical for the overall success of river revitalization. Phrases in the DEIR such as "improved crosswalks and landscaping buffers where feasible" do not demonstrate any underlying knowledge of or commitment to nonmotorized transportation. To ensure consistency with the draft City of LA Bicycle Plan, the proposed bicycle network must be reviewed and approved by the LA Department of Transportation Bicycle Program, preferably with staff time paid for by the applicant.

Even if the internal network provides adequate access to destinations within the project boundary, as proposed the bicycle path (or lanes) fails to even complete a connection to the river greenway on the west side of the project. Thus, the applicant's proposed replacement for the riverfront path is not even continuous on the western end. The detour would add approximately one mile to through bicycle and pedestrian trips, discouraging the use of these modes for utilitarian trips. Furthermore, the detour would add at least six crossings of high-traffic streets in less than two miles, each exposing vulnerable users to vehicular conflicts and increasing travel times for nonmotorized modes. Landscaping buffers and enhanced crosswalks do not reduce the frequency of turning conflicts. Any one of these effects could be considered a significant impact; the cumulative effect decreases the safety, efficiency, and continuity of nonmotorized travel called for by multiple City and County plans and eviscerates the vision of the two river master plans. The only feasible course of action is to implement the plans' clear intent to construct a continuous greenway along the length of the river corridor, which could include crossing the river.

Response to Comment No. 17-6

One of the Project's basic objectives is to implement a Project design which promotes alternative modes of transportation, which includes but is not limited to non-motorized (i.e., bicycle and pedestrian) travel. Contributing to the implementation of this objective is the proposed Project's on-site bicycle network, which consists of Class I and Class II facilities that would be designed in accordance with the standard definitions for these types of facilities. Specifically, Class I facilities are bicycle lanes which are physically separated from vehicular travel, whereas Class II facilities are marked lanes on streets. As set forth in the Project's proposed Streetscape Plan, Appendix A-4 to the proposed City Specific Plan (see Appendix A-1 of the Draft EIR), the Project's streetscape design

incorporates Class II bicycle lanes on both sides of Lakeside Plaza Drive which connect to the Class II bicycle lanes on the proposed North-South Road. An off-street Class I bicycle path would connect the southerly end of the North-South Road to the Class II bicycle lanes along Universal Hollywood Drive through to Lankershim Boulevard, also with a connection to CityWalk. Connecting to this system of Class I and Class II bicycle facilities would be additional Class II bicycle lanes along the various smaller roadways proposed within the Mixed-Use Residential Area.

Contrary to the statements in the comment, the Project's proposed on-site bicycle network is not intended to substitute or serve as a replacement route for County or City proposed bicycle paths along the Los Angeles River Flood Control Channel, including routes proposed in the City's Bicycle Plan. As stated in Response to Comment No. 17-2, above, the Project would not preclude implementation of a bicycle path along the Los Angeles River Flood Control Channel as set forth in applicable City and County plans. It should also be noted that, as stated on page 653 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, the proposed on-site bicycle path system would be subject to the review and approval of the City Bureau of Engineering, Los Angeles Department of Transportation, and/or County of Los Angeles Department of Public Works for the portions of the bicycle facilities within their respective jurisdiction. This review process would ensure the development of safe bicycle facilities which would preclude the types of significant impacts suggested in the comment.

Comment No. 17-7

NBC Universal Must Implement Relevant Portions of LARRMP

The Conservancy further asserts that implementation of the greenway should be a condition of approval for both the City and County's discretionary actions. There is ample nexus to require such a condition to ensure consistency with adopted plans. In particular, two discretionary actions are directly linked to greenway implementation.

First, the project's proposed continued lease of the County-owned River Road should only be permitted if this lease is compatible with the construction of a multi-use trail along this same river reach. The studios currently lease access rights along the County's access road for internal circulation of studio vehicles. The compatibility of this lease agreement with public river access must be evaluated. Renewing the lease without allowing public access would violate multiple adopted plans. Studio use of the County asset would only be consistent with the relevant plans if the public riverfront trail is constructed and maintained by the applicant.

Response to Comment No. 17-7

As noted in the comment and the Draft EIR, the Applicant has use of the County portions of River Road pursuant to a lease agreement with the County until such time as the County requires use of the right-of-way for other County purposes. The Applicant has leased this road for over 35 years. A lease agreement for the road is not a requested action of the Project.

As stated in Response to Comment No. 17-2, above, the proposed Project would not preclude implementation of a public path along the Los Angeles River Flood Control Channel, as contemplated by City and County plans. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 17-8

Second, the removal of the East-West Road from the County General Plan eliminates the most direct route for non-motorized travel from Forest Lawn Drive to Lankershim Boulevard. As previously mentioned, elimination of this direct route adds a mile to all nonmotorized trips, a significant deterrent to utilitarian travel. Understandably, the applicant is seeking to avoid the demolition of multiple studio buildings that would be required if the road were constructed. Fortunately, completion of the LA River Greenway through this corridor would retain the planned direct route for nonmotorized travel while only detouring motorized travel, for which a one-mile detour is less than significant. If the East-West Road were constructed as part of the proposed project, the applicant would be responsible for the entire cost of roadway construction. Therefore, amendment of the County General Plan to remove the East-West Road should only be approved with the condition that the LA River path be fully constructed by the applicant.

Response to Comment No. 17-8

With respect to non-motorized travel, refer to Response to Comment No. 17-2. Regarding the East-West Road, the road is shown on the County's Highway Plan as a major public highway (100-foot right-of-way) without reference to non-motorized travel, and as discussed in the Draft EIR, no funding has been allocated for the East-West Road and no right-of-way has been dedicated for its construction. The Applicant's proposed deletion of the planned East-West Road as shown on the 1980 County Highway Plan, which is part of the County's General Plan, is addressed through an analysis of Project alternatives. Section V, Alternatives to the Proposed Project, of the Draft EIR analyzes two configurations of the East-West Road. Alternative 8 evaluates the East-West Road as only a direct connection between Barham and Lankershim Boulevards, whereas Alternative 9 adds the Forman Avenue extension, a north-south street that would connect the East-West

Road to Riverside Drive, for a number of purposes including, but not limited to, providing additional access to the SR-134 Freeway. The traffic analyses conducted as part of the Alternatives analysis concluded that future traffic conditions with the Project would be worse under Alternatives 8 and 9 than what occurs under the proposed Project and that these alternatives would also result in increased impacts to air quality, noise, and historic resources as compared to the Project.

Further, the County Highway Plan was adopted on November 25, 1980. As stated on page 416 of Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, the County is currently in the process of updating the County General Plan including, but not limited to, an update to the County Highway Plan. A draft of the updated County Highway Plan from the Draft Mobility Element is set forth as Figure 4.4 of the Draft Mobility Element (see Figure 5 on page 1483). While the Draft County Highway Plan as proposed would delete the East-West Road with the Forman Avenue Extension, the officially adopted County Highway Plan as of this date is the County Highway Plan adopted on November 25, 1980. As such, one of the discretionary actions requested to implement the proposed Project is the deletion of the East-West Road from the County Highway Plan. The commenter is also referred to Topical Response No. 10: East-West Road Alternatives (see Section III.C, Topical Responses, of this Final EIR).

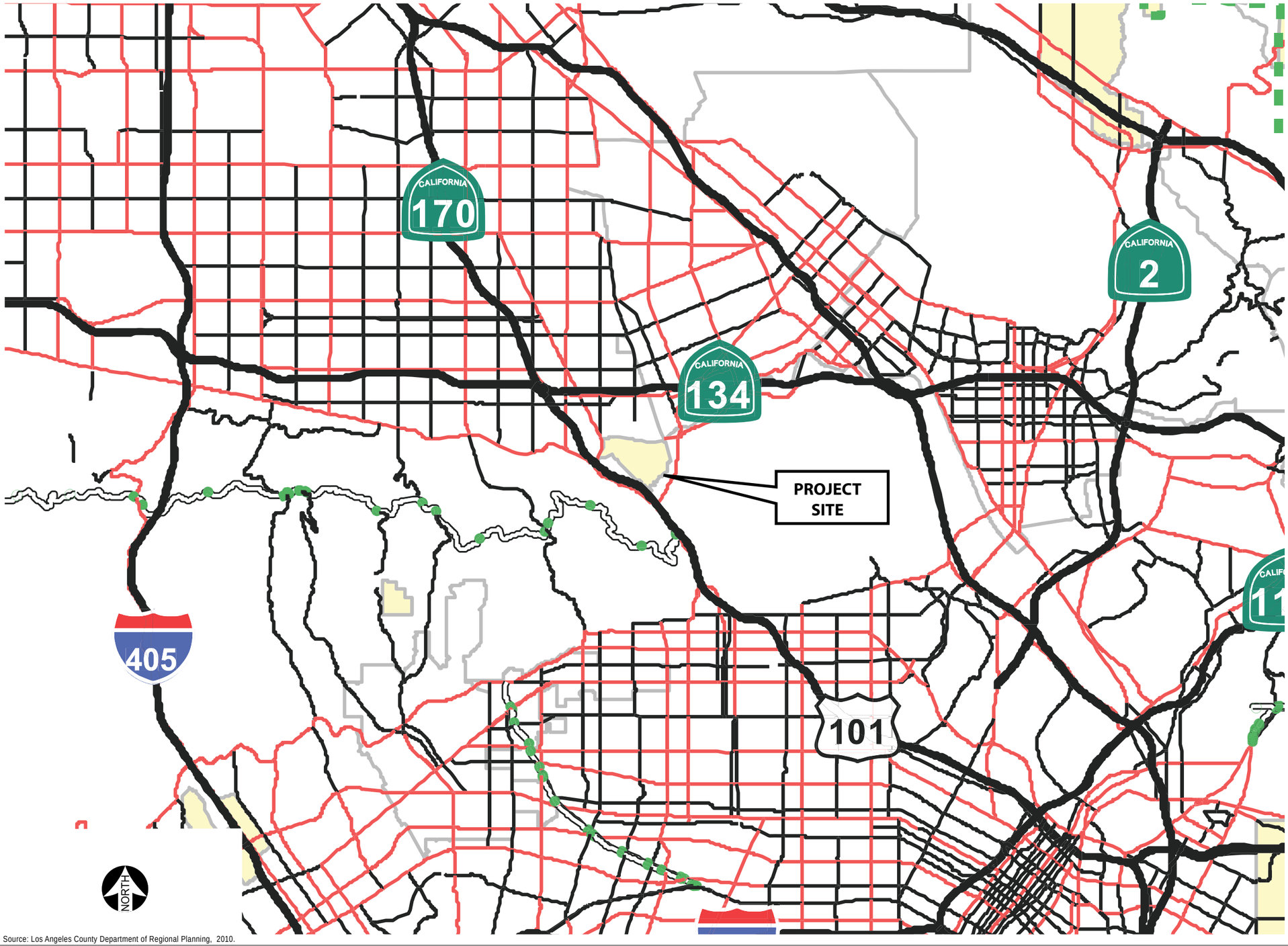
With regard to a path along the Los Angeles River, as explained in Response to Comment No. 17-2, the majority of the land adjacent to the Los Angeles River Flood Control Channel is owned by the County, and the Project does not preclude the implementation of a path. Please refer to Response to Comment No. 17-2, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 17-9

The Los Angeles River Revitalization Master Plan is a policy document adopted by the City Council. Proposed projects are required to be consistent with this document to not have significant land use impacts. As proposed, the project does not meet the plan's goals and objectives to increase public access to the river and activate properties along the riverfront. The plan addresses issues including building facades, lighting, views, shade, human scale, and wayfinding. The DEIR is deficient for not analyzing the compatibility of adjacent studios with these design features and proposing appropriate mitigation.

Response to Comment No. 17-9

As explained in Response to Comment No. 17-2, above, and on pages 496–497 and 523–524 of the Draft EIR, the Project furthers the goals and objectives of, and would not be inconsistent with, the Los Angeles River Master Plan and the Los Angeles River



Source: Los Angeles County Department of Regional Planning, 2010.

COUNTY OF LOS ANGELES GENERAL PLAN * DRAFT *

Los Angeles County Highway Plan

Figure 4.4

LEGEND:

- Freeway - Existing
- Freeway - Proposed
- Major Highway - Existing
- Major Highway - Proposed
- Secondary Highway - Existing
- Secondary Highway - Proposed
- Limited Secondary Highway - Existing
- Limited Secondary Highway - Proposed
- Parkway - Existing
- Parkway - Proposed
- Expressway - Existing
- Expressway - Proposed
- National Forest
- Unincorporated Area

NOTE: This map is a component of the Los Angeles County General Plan Update Program. It is a working draft subject to revision. This map will not be official until adopted by the Board of Supervisors. Information within cities is for reference only. Suggestions for modifications to its content will be considered by County staff when revising the map for public hearings by the Regional Planning Commission. Written comments and supporting documentation should be submitted to the Department of Regional Planning General Plan Development Section (address: 320 W. Temple Street, Los Angeles, CA 90012; fax: 213-626-0434; or email: generalplan@planning.lacounty.gov).

Los Angeles County
Department of Regional Planning

matrix environmental

Figure 5
County of Los Angeles General Plan Update Program
Draft Mobility Element -- Draft Update to Los Angeles County Highway Plan

Revitalization Master Plan. Of particular relevance to this comment is the analysis presented on page 496 of the Draft EIR which explains that the Project also includes requirements to incorporate appropriate visual treatment, such as articulation or landscape buffering, of new buildings facing the river and limitations on signage along the northern Project Site edge. In addition, Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, analyzed the Project in relation to adopted planning policies and concluded that Project impacts with respect to land use plans would be less than significant. Please refer to Response to Comment No. 17-2, above.

Comment No. 17-10

In addition, the Revitalization Master Plan proposes specific projects along the length of the river. Implementation of these river projects would mitigate the proposed project's impacts on the river corridor. The projects below are wholly located on land controlled by the City, County, or the applicant and immediately adjacent to the applicant's project area. The listed projects would add considerable value to the proposed project and could be seamlessly incorporated into planned improvements:

- Cahuenga to Headworks River Greenway (south side), Project #109
- Lankershim Boulevard Arterial Green Street, Project #106
- Lankershim Boulevard River Bridge, Project #107
- Lankershim Boulevard and Cahuenga Boulevard Enhanced Intersection, Project #108
- Weddington Park to Riverside Drive (by Forest Lawn) River Greenway (north side), Project #105

The first project (#109) is essential for plan consistency and, as previously mentioned, must be incorporated as a mitigation measure. A preliminary engineering and feasibility study should be included with the Final EIR, with construction of the bikeway occurring during the first phase of residential development. The last project (#105) may be analyzed as an alternative to this project provided that it is continuous with planned path extensions to the east and west. This would likely entail two river crossings (east and west) to connect with path segments on the south side of the river. Projects must be designed to be compatible with eventual channel restoration.

The three projects along Lankershim Boulevard must be incorporated into traffic mitigation measures. Like other improvements along Lankershim Boulevard, proportional costs may be split with the Metro Universal project as appropriate. Incorporation of green street

features on Lankershim Boulevard will be cost effective if designed and implemented in conjunction with other planned improvements.

Response to Comment No. 17-10

As explained further in Response to Comment No. 17-2, above, and on pages 496–497 and 523–524 of the Draft EIR, the Project furthers the goals and objectives of, and would not be inconsistent with, the Los Angeles River Master Plan and the Los Angeles River Revitalization Master Plan. Therefore, the Project does not have a significant adverse impact on the river corridor and mitigation measures to address river corridor impacts are not required. Further, the Project's traffic mitigation program was developed to mitigate the Project's impact at the analyzed intersections per the LADOT guidelines (LADOT Traffic Study Policies and Procedures). In addition, the proposed Universal Studios Specific Plan, attached as Appendix A-2 of the Draft EIR, requires a Lankershim Boulevard Streetscape Plan to address aesthetics and pedestrian access of the Project along the east side of Lankershim Boulevard. Regarding the Metro Universal project, please refer to Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, of this Final EIR).

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 17-11

All projects should be coordinated with the Bureau of Engineering's River Projects Office to ensure consistency with other planned and ongoing improvements in the corridor.

Response to Comment No. 17-11

As discussed in the above responses, the Project is not required to implement improvements that would be under the purview of the Bureau of Engineering's River Projects Office. The request to coordinate with the Bureau of Engineering's River Projects Office is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 17-12

Project Threatens Wildlife Connectivity Through Cahuenga Pass

Aside from impacts to the Los Angeles River, the Conservancy is concerned with indirect impacts to wildlife connectivity through Cahuenga Pass. Currently, mobility through the pass is greatly limited by the Hollywood Freeway and parallel infrastructure. To the east, Griffith Park is a large enough habitat block to sustain populations of some mammals,

including mule deer, coyotes, bobcats, and grey foxes. However, these populations are becoming genetically isolated as increasing traffic volumes all but preclude safe passage through Cahuenga Pass.

The proposed project would increase vehicular traffic on the Hollywood Freeway, with spillover traffic on Cahuenga Boulevard West and East. Increased traffic, particularly in the late night and early morning hours, will correspondingly increase wildlife mortality in this constrained passage. The DEIR is deficient for not addressing these impacts, despite the Conservancy's identification of the issue during scoping. The Final EIR must fully analyze these impacts and propose mitigation measures to improve successful wildlife movement over the Mulholland and Vine Street freeway bridges. Mitigation may include physical improvements to the crossings and/or acquisition of key bridge approach parcels by a public agency.

Response to Comment No. 17-12

Contrary to the assertion in the comment, the Draft EIR evaluated potential impacts to wildlife movement corridors. As concluded in Section IV.I, Biota, of the Draft EIR, the Project Site is not considered a major wildlife movement corridor or habitat linkage. As discussed on page 1570 of the Draft EIR and in the Biological Site Assessment, attached as Appendix K-1 to the Draft EIR,"[t]he areas of habitat on-site may allow for limited movement of larger or more mobile animals (such as the resident deer herd, raccoons, coyotes, bobcats, squirrels) within the Project Site and possibly to the relatively less developed areas and Griffith Park to the east by crossing Barham Boulevard. The physical barriers between the Project Site and the surrounding area include heavy traffic, development, and fences. Wildlife movement between the Project Site and remaining undeveloped habitat to the south in the Santa Monica Mountains is likely to be very limited (except for birds, bats, and insects) due to the lack of physical linkages and the barriers of U.S. Highway 101." As recognized in the comment, the existing freeway and roadways already restrict wildlife movement in the area. As indicated on page 1590 of the Draft EIR and in Appendix K-1, "[a]lthough limited wildlife movement may occur between the Project Site and areas to the east, movement of terrestrial animals is unlikely to areas north, south, and west of the Project Site. Therefore, the Project Site does not act as a true wildlife corridor, movement pathway, or linkage between larger habitat areas for terrestrial wildlife. Thus, although the Project would result in a loss of some of the relatively natural woodland, scrub and grassland habitats on-site, this would not result in a significant impact to wildlife migration or movement corridors." Because the Project's impacts to wildlife migration or movement are less than significant, mitigation measures to address these impacts are not required.

Comment No. 17-13

Inconsistent with Goals of Mulholland Scenic Parkway Specific Plan

The proposed project claims consistency with the Mulholland Scenic Parkway Specific Plan while exempting itself from the requirements of the plan. Aside from this prima facie contradiction, the standards that would be established by the applicant's proposed specific plan districts would be far less protective of visual resources. These specific concerns are outlined in greater detail below.

The Conservancy maintains that the applicant's request for exemption from the Mulholland Specific Plan is unwarranted and sets a bad precedent for other large projects in the Mulholland Corridor. In no case should the standards of the new specific plan district be less restrictive than that of the Mulholland Specific Plan. The Mulholland Specific Plan was created in 1992 after considerable outreach to the affected communities. The applicant is attempting an end-run around the Mulholland Specific Plan's stricter requirements for grading, signage, lighting, and uses. The City should see this for what it is and disallow it.

Response to Comment No. 17-13

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

As one of the requested entitlement actions, the Project proposes revising the boundaries of the Mulholland Scenic Parkway Specific Plan to remove a small portion of the southeastern-most tip of the Project Site. The area that is the subject of this request totals less than two acres (or approximately 0.5 percent of the 391-acre Project Site) and is proposed to be included within the proposed Universal City Specific Plan area in order to create unified and coherent regulations for all portions of the Project Site to be located within the City.

For informational purposes, the Mulholland Scenic Parkway Specific Plan area is divided into two areas—the Inner and Outer Corridors. The boundaries of these corridors are determined via distance from the Mulholland Scenic Parkway right-of-way, with the outermost boundary of the Outer Corridor extending 0.5 mile outward from the Mulholland Drive right-of-way. Mulholland Drive reaches its eastern terminus in the Project area where it turns from a primarily east-west road to a north-south road as it connects with Cahuenga Boulevard. Based on these conditions, the strict application of the Outer Corridor boundary places the eight-lane Hollywood Freeway and areas on the north (far) side of the Freeway within the boundaries of the Mulholland Scenic Parkway Specific Plan (see Figure 28 on page 433 of the Draft EIR). As concluded on page 525 of the Draft EIR in Section, IV.A.1, Land Use – Land Use Plans/Zoning, since the context of the Project Site is dominated by the Hollywood Freeway and is not contiguous with other areas within the Mulholland Scenic

Parkway Specific Plan Outer Corridor, land use impacts with respect to the intention of the Mulholland Scenic Parkway Specific Plan to preserve the visual quality of natural open space would be less than significant. The analysis goes on to further conclude that the proposed Project would not be inconsistent with existing Mulholland Scenic Parkway Specific Plan policies to preserve the existing residential character of areas along and adjoining the Mulholland Drive right-of-way, to protect all identified archaeological and paleontological resources, and to assure that land uses are compatible with the parkway environment. Therefore, the impact of the Project with respect to the Mulholland Scenic Parkway Specific Plan policies and regulations for the Outer Corridor are concluded in the Draft EIR to be less than significant.

Additionally, the proposed Project development would not be located on or proximal to any designated Prominent Ridge as identified and defined in the adopted Mulholland Scenic Parkway Specific Plan on maps 1B through 6B. As discussed on page 1087 in Section IV.D, Visual Qualities, of the Draft EIR, the primary view resources available from the Mulholland Ridge geographic area are panoramic views of the San Fernando Valley and Verdugo Mountains in the background. Since the Project would not result in the substantial view coverage of a prominent resource, Project impacts from the Mulholland Ridge geographic area would be less than significant.

Based on the analysis and conclusions presented above, the Draft EIR concludes that the deletion of the small portion of the Project Site from the boundaries of the Mulholland Scenic Parkway Specific Plan would be less than significant.

Comment No. 17-14

Inadequate Preservation of Open Space on Site

The Conservancy's response to the Notice of Preparation included a proposed open space area to be protected by a conservation easement or fee ownership by a public agency. The Conservancy reasserts that this same area must be permanent natural open space to mitigate the intensity of the proposed project. At first glace [sic], the applicant's Open Space Districts 1 and 2 appear to partially reflect the Conservancy's recommendation. However, the applicant's open space proposal is deficient in multiple respects. First, the sheer size of the project warrants much greater open space area than the 29 acres proposed. (Open Space District 3 is not natural in character and is therefore not be [sic] included in this amount.) Second, and more important, the standards for the open space areas are extraordinarily permissive. In particular, Open Space District 2 would allow for signage, cell phone towers, maintenance sheds, public service facilities up to 20,000 square feet, utility infrastructure, and exotic plants. All of these uses detract from the character and benefit of the proposed open space.

What these districts lack is any assurance that they will provide habitat for native wildlife and an enforceable mechanism for protecting and restoring native plant communities. These districts must be strengthened and expanded to protect on-site biological resources. Trails are not incompatible with these objectives, but any more intense use of these areas greatly reduces their utility as habitat. Adequately constrained conservation easements in favor of the Mountains Recreation and Conservation Authority would accomplish these resource protection goals while still permitting appropriate passive recreational use by residents and the public.

Response to Comment No. 17-14

This comment refers to the provisions of the proposed Universal City Specific Plan and the proposed Universal Studios Specific Plan and not to the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

As provided in Section 5 of the proposed City Specific Plan, and discussed in Section IV.K.4, Public Services – Parks and Recreation, of the Draft EIR, park or recreation space in an amount equal to 200 square feet per Dwelling Unit within the City Specific Plan area shall be provided to meet the recreation needs of residents. The required open space would not have to be dedicated to the City as publicly owned property. The property owners association would be responsible for the ownership and maintenance of the park and recreation space. The parks would be developed in general accordance with the Conceptual Parks and Open Space Plan, Figure 211 on page 1790 of the Draft EIR. A phasing and implementation plan shall be developed prior to issuance of a building permit for a Project under the proposed City Specific Plan.

With regard to the request for a conservation easement, as discussed in the Draft EIR, Los Angeles Municipal Code Section 17.12 permits privately owned park and recreation space provided within a residential subdivision to be credited against that section's requirement that land be dedicated and/or in-lieu fees be paid for park and recreational purposes. (DEIR, page 1797.) To implement the cited LAMC provisions, following Project approval, the Applicant will be required to execute and record covenants binding any and all future owners of property in the subdivided residential area, and those covenants will require the park and recreational space required under City Specific Plan Section 5(a) to be restricted for such uses in perpetuity. (DEIR, page 1798.)

As discussed in Section II, Project Description, of the Draft EIR, the Project includes three proposed Open Space Districts that allow varying types of open space and recreational uses in designated areas. Open Space Districts Nos. 2 and 3 also allow for certain additional permitted activities. The proposed City Specific Plan would regulate the permitted facilities and uses in each Open Space District. In addition, the proposed

Universal City Design Guidelines (see Appendix No. 2 to the proposed City Specific Plan, attached as Appendix A-1 to the Draft EIR) include general and district-specific guidelines for the park lands and open space throughout the Universal City Specific Plan area, including planting recommendations.

Please also refer to Response to Comment No. 17-3 and Response to Comment No. 17-12, above.

Comment No. 17-15

Proposed Project Would Impact Significant Visual Resources

In addition to the visual impacts as seen from Mulholland Drive, the project would substantially alter a key scenic resources [sic] as seen from the Hollywood Freeway. The hill southwest of Hollywood Manor is a significant visual resource for travelers and the community that retains native plant communities and good vegetative cover. The proposed project would construct housing on the summit of this hill and require extensive slope stabilization below, completely altering the character of the resource. Given that the proposed uses for this area are ancillary to the project as a whole, no development should occur in this area between Buddy Holly Drive and Blair Drive. The high-rise alternative does in fact avoid residential development of this area, demonstrating the feasibility of this request without compromising other project goals. This area should instead be protected by the above mentioned conservation easement and restored with native vegetation.

Response to Comment No. 17-15

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Mulholland Drive is located over 0.5 mile from the portion of the Project Site referenced in this comment. As discussed in Response to Comment No. 17-14, views from vantage points in this area are of the San Fernando Valley with the Verdugo Mountains in the backdrop. In other words the views from vantage points in this area are broad and panoramic in nature, with the most notable view resource from this vantage point being the backdrop formed by the Verdugo Mountains. As such, the portion of the Project Site referenced in the comment makes up a very small part of the available viewshed in the foreground and is not particularly distinguishable as it is part of an overall larger off-site hillside that extends above the Project Site to the north. From the other cited vantage points, due to the roadway orientation and surrounding topography and land use patterns, views of the southeastern corner of the Project Site available to travelers on the freeway are peripheral and temporary in nature. As such, this area of the Project Site does not provide for extended views nor does it constitute a major portion of any of the available fields of view from these vantage points.

As described on page 1049 in Section IV.D, Visual Qualities, of the Draft EIR, at the southeastern corner of the Project Site there is an existing sign and a densely vegetated slope. As discussed on page 10 of Appendix K-1, the Biological Site Assessment, of the Draft EIR, the southeastern corner of the Project Site contains areas of highly disturbed grassland, scrub, and areas dominated by ornamental vegetation. Under the proposed Project, the southeast corner of the Project Site could be developed with low-rise structures and improved with landscaping and open space and the existing sign could be upgraded. Based on the Project's proposed future grades, building heights and open space areas, the majority of the existing hillside would remain. The overall character of the Project Site as seen from the height and distance of the Mulholland Ridge would appear similar to its current condition and impacts to visual character from the Mulholland Ridge area would be less than significant.

Comment No. 17-16

Please continue to send all future documentation to the letterhead address. Should you have any questions, contact Paul Edelman of our staff at (310) 589-3200 ext. 128.

Response to Comment No. 17-16

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision makers prior to any action on the Project.

Comment Letter No. 18

Ian MacMillan
Program Supervisor, CEQA Inter-Governmental Review
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765
imacmillan@aqmd.gov

Comment No. 18-1

Comments regarding the draft EIR for the NBC Universal Evolution Plan Project are attached to this email. Please be advised that you will also receive these comments via US Mail.

Response to Comment No. 18-1

The introductory comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 18-2

Review of the Draft Environmental Impact Report (Draft EIR)
for the Proposed NBC Universal Evolution Plan

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the final Environmental Impact Report (final EIR) as appropriate.

Response to Comment No. 18-2

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 18-3

The AQMD staff is concerned that the proposed project places residential land uses approximately 200 feet from the 101 Freeway. The AQMD staff is specifically concerned about potential health risk impacts from toxic air pollutants emitted by the significant volume (i.e., 253,000 annual average daily trips) of traffic on the 101 freeway. Therefore,

AQMD staff requests that the lead agency revise the Health Risk Assessment (HRA) to determine the potential health risk impacts to future sensitive receptors at the project site from the 101 freeway. Further, AQMD staff recommends that pursuant to Section 15370 of the California Environmental Quality Act (CEQA) Guidelines additional mitigation measures are considered to minimize the project's significant air quality impacts. Details regarding these comments are attached to this letter.

Response to Comment No. 18-3

The comment raises the issue of potential health risks associated with siting residences on the Project Site within 200 feet of the US 101 Freeway. Section IV.H, Air Quality, of the Draft EIR and the Air Quality Technical Report (Appendix J of the Draft EIR) provide detailed analysis of potential health risks associated with the Project, and include a discussion of health risks related to potentially siting residences in certain locations on the Project Site within 500 feet of the US 101 Freeway. (See pages 1434–1441 in Section IV.H, Air Quality, of the Draft EIR and pages 1501–1506 of Appendix J of the Draft EIR.) The Draft EIR analyzes potential air quality and health risk impacts in accordance with the South Coast Air Quality Management District's California Environmental Quality Act (CEQA) Air Quality Handbook (CEQA Handbook).

As discussed on pages 1505–1506 in Section IV.H, Air Quality, the Draft EIR describes potential impacts associated with sensitive receptors living within 500 feet of a freeway. The South Coast Air Quality Management District CEQA Handbook does not require analyzing impacts from freeways associated with siting to future residences within 500 feet of a freeway because siting issues are generally addressed by a local agency's zoning ordinance. However, the California Air Resources Board published the Air Quality and Land Use Handbook on April 28, 2005 (the "CARB Handbook") to serve as a general guide for considering health effects associated with siting sensitive receptors proximate to sources of toxic air contaminants. (Draft EIR, pages 1442–1443.) As discussed on pages 1442–1443 and 1505–1506 of the Draft EIR, the CARB Handbook is only an advisory document and is not binding on any lead agency but was incorporated into the Draft EIR for informational purposes.

Studies cited by the CARB Handbook provide evidence of an association between living in close proximity to a freeway and adverse health effects. (Draft EIR, page 1443; Appendix J, Air Quality, page 104.) Freeway pollutants and related health effects, however, were found to decrease dramatically within a short distance from the freeway. (Draft EIR, pages 1443, 1505–1506.) A study cited by the CARB Handbook showed concentrations of traffic-related particulate matter declining by 70 percent at a distance of 500 feet from the freeway. (CARB Handbook, page 6; Draft EIR, Appendix J, page 104.) Similarly, another study demonstrated that vehicle-related particulate matter concentrations

decreased substantially between a distance of 65 feet to 98 feet from the I-710 freeway, and between 98 feet to 295 feet from the I-405 freeway in Los Angeles. (Draft EIR, Appendix J, page 104.) As a result, the CARB Handbook established a recommendation to avoid siting residential receptors within 500 feet of a freeway. As discussed on page 4 of the CARB Handbook, the CARB Handbook expressly recognizes that its "recommendations are advisory. Land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues."

As discussed on page 1507 of the Draft EIR and shown in Figure 197, the majority of locations where residential development may occur on the Project Site would be more than 500 feet from the US 101 Freeway. Nevertheless, residential development may occur on the Project Site within certain locations within 500 feet of the US 101 Freeway. As discussed on page 1522 of the Draft EIR, the Project includes the following project design features:

> **Project Design Feature H-4:** In conjunction with development within Planning Subareas 6-9, the Applicant or its successor shall install tiered vegetative landscaping between US 101 Freeway and any Project residential unit located within 500 feet of US 101 Freeway.
>
> **Project Design Feature H-5:** In conjunction with development within Planning Subareas 6-9, the Applicant or its successor shall install an air filtration system on any Heating, Ventilation and Air Conditioning system within any Project residential unit located within 500 feet of US 101 Freeway. The air filtration system shall achieve a reduction of at least 70 percent of the freeway particulate matter emissions.

As discussed on page 1506 of the Draft EIR, studies have shown that vegetative landscaping can reduce particulate concentrations in the air by up to 65 to 85 percent, with greater removal rates expected for ultra-fine particles less than 0.1 µm in diameter. The Sacramento Metropolitan Air Quality Management District has recognized that vegetative screening can substantially mitigate particulate concentrations in the air from freeway emissions.[36] A University of California, Davis study determined that certain vegetative screening can remove more than 80 percent of ultrafine particulates, including 99 percent

---

[36] *Sacramento Metropolitan Air Quality Management District, Recommended Protocol for Evaluating the Location of Sensitive Land Uses Adjacent to Major Roadways, January 2009, pages 21–22.*

of particulates with a diameter of 0.015 or less.[37] As discussed on page 1438 of the Draft EIR, ultrafine particulates, which are most effectively removed by trees and vegetative screens, are the primary source of potential health risks associated with freeway emissions.

As discussed on page 1506 of the Draft EIR, Project Design Features H-4 and H-5 are estimated to achieve the equivalent particulate matter reduction for residences on the Project Site within 500 feet of the US 101 Freeway as would be achieved if those residences were located outside the 500-foot area, consistent with applicable recommendations in the CARB Handbook. When considering the potential health risks from siting residents in certain locations on the Project Site within 500 feet of the US 101 Freeway, it is also important to recognize that the Project advances a number of goals and policies encouraging infill residential development near commercial centers and transportation hubs to reduce vehicle miles traveled and vehicle trips, which, in turn, reduces vehicle emissions relative to developments that locate residents less proximate to existing jobs and services. The air quality benefits of infill, transit-oriented development have been widely recognized as a critical step to reducing vehicle-related emissions by the California Legislature with the passage of Senate Bill 375,[38] the SB 375 Regional Transportation Advisory Committee,[39] and the California Air Pollution Control Officer's Association,[40] among others. In addition, any risk related to diesel particulate matter emissions from roadway sources would likely be reduced by the time construction is complete because of aggressive efforts by the California Air Resources Board and South Coast Air Quality Management District to cut diesel particulate matter emissions. (Draft EIR, page 1506; Appendix J, Air Quality, pages 104–105.) For these reasons, the Project is consistent with the CARB Handbook.

However, the comment requests additional analysis of potential health risks associated with potentially siting residents in certain locations on the Project Site within 500 feet of the US 101 Freeway. To further inform the public and decision-makers, a supplemental Health Risk Analysis was prepared and is included in the Final EIR as

---

[37] *Fuller, Micah, et al., University of California, Davis, Practical Mitigation Measures for Diesel Particulate Matter: Near-Road Vegetative Barriers, July 14, 2009, pages 7–8.*

[38] *Senate Bill 375 (SB 375, Steinberg, Statutes of 2008), chaptered September 30, 2008.*

[39] *SB 375 Regional Targets Advisory Committee Report, September 29, 2009—Final RTAC Report, www.arb.ca.gov/cc/sb375/rtac/report/092909/finalreport.pdf.*

[40] *California Air Pollution Control Officer's Association. August 2010. Quantifying Greenhouse Gas Mitigation Measures, www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf.*

Appendix FEIR-8 ("Supplemental Health Risk Analysis"). The Supplemental Health Risk Analysis evaluates potential cancer and non-cancer health impacts at locations within the Project Site where expected residential development may occur within 500 feet of the US 101 Freeway.

As discussed on page 8 of the Supplemental Health Risk Analysis, Project Design Features H-4 and H-5 achieve their intended purpose for maintaining consistency with applicable recommendations in the CARB Handbook, which, as discussed on page 1506 of the Draft EIR, are based on achieving the equivalent particulate matter reduction for residences within 500 feet of the US 101 Freeway as would be achieved if those residences were located outside the 500-foot area. (Appendix J, Air Quality, page 104.) For the Final EIR, Project Design Features H-4 and H-5 have been modified (see Corrections and Additional No. IV.H.A in Section II of this Final EIR) for clarification purposes and to enhance particulate matter reductions for residences within 500 feet of the US 101 Freeway on the Project Site beyond what is needed to maintain consistency with the CARB Handbook. (Supplemental Health Risk Analysis, page 8; Appendix J, Air Quality, page 104.) As such, Project Design Features H-4 and H-5 in the Final EIR ensure the Project's consistency with the CARB Handbook and also provide additional particulate matter reductions.

As discussed on page 2 of the Supplemental Health Risk Analysis, the South Coast Air Quality Management District has not published guidelines or a protocol for evaluating cancer risk/non-cancer impacts due to major roadways within 500 feet. Although it is not required by the South Coast Air Quality Management District's CEQA Handbook, the Supplemental Health Risk Analysis included a comparison of its results to the South Coast Air Quality Management District significance thresholds (as summarized on pages 1463–1465 of the Draft EIR) for informational purposes only. As shown on Table 8 and Figure 4 of the Supplemental Health Risk Analysis, maximum estimated excess lifetime cancer risks, chronic hazard index, and acute hazard index estimates are 9.2, 0.06, and 0.01, respectively, which are below South Coast Air Quality Management District significance thresholds.

The comment also states additional mitigation measures should be considered to minimize the project's significant air quality impacts and that details regarding this comment are provided later in the comment letter. Specific comments regarding the mitigation measures are provided and responded to below.

Comment No. 18-4

Pursuant to Public Resources Code Section 21092.5, AQMD staff requests that the lead agency provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the lead agency to

address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Response to Comment No. 18-4

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Written responses to all comments regarding the Draft EIR have been provided herein.

Comment No. 18-5

Health Risk Impacts

Based on the project description (i.e., chapter two) in the draft EIR the proposed project includes residential uses located approximately 200 feet from the 101 Freeway. Residential land uses are considered sensitive land uses[1] as a result, AQMD staff is concerned about the potential health risk impacts from toxic air pollutants emitted by the significant volume (i.e., 253,000 annual average daily trips)[2] of traffic on this segment of the 101 freeway. Therefore, the AQMD staff requests that the lead agency evaluate the cumulative health risk impacts to future sensitive receptors at the project site in the HRA. In the event that the HRA demonstrates significant health risk impacts the lead agency should provide mitigation that prohibits residential development within 500 feet[3] of the 101 freeway.

1 *California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at: http://www.arb.ca.gov/ch/landuse.htm*

2 *Based on the 2009 traffic counts published by Caltrans. Accessed at: http://traffic-counts.dot.ca.gov/.*

3 *Based on the recommendations for siting new sensitive land uses on page four of the "Air Quality and Land Use Handbook: A Community Health Perspective."*

Response to Comment No. 18-5

The comment raises the issue of potential health risks associated with siting residences on the Project Site within 500 feet of the US 101 Freeway and is similar to Comment No.18-3. Please refer to Response to Comment No. 18-3, above.

Comment No. 18-6

Mitigation Measures for Construction Air Quality Impacts

2. Given that the lead agency's construction air quality analysis demonstrates significant air quality impacts from NOx, CO, PM10, PM2.5 and VOC emissions the AQMD staff recommends that the lead agency provide additional mitigation pursuant to CEQA Guidelines §15370. Specifically, AQMD staff recommends that the lead agency minimize or

eliminate significant adverse air quality impacts by adding the mitigation measures provided below.

Response to Comment No. 18-6

The comment provides introductory comments regarding additional suggested mitigation measures. Responses to specific suggested mitigation measures are provided below.

Comment No. 18-7

- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow,

Response to Comment No. 18-7

The mitigation requested by the comment is already addressed by Mitigation Measure B-41 of the Draft EIR (Mitigation Measure B-44 of the Final EIR), as discussed on page 681 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, and Mitigation Measure H-1, as discussed on pages 1522–1523 in Section IV.H, Air Quality, of the Draft EIR.

Mitigation Measure B-41 provides that the Project Applicant or its successor shall prepare construction traffic management plans, including but not limited to street closure information, detour plans, haul routes, and staging plans, satisfactory to the affected jurisdictions. The construction traffic management plans shall be based on the nature and timing of the specific construction and other projects in the vicinity of the Project Site, and shall include the following elements as appropriate:

1. Provisions to configure construction parking to minimize traffic interference;

2. Provisions for temporary traffic control during all phases of construction activities to improve traffic flow on public roadways (e.g., flag person);

3. Scheduling construction activities to reduce the effect on traffic flow on public roadways;

4. Rerouting construction trucks to reduce travel on congested streets;

5. Consolidating construction truck deliveries;

6. Provision of dedicated turn lanes for movement of construction trucks and equipment on- and off-site;

7. Construction-related vehicles shall not park on any residential street;

8. Provision of safety precautions for pedestrians and bicyclists through such measures as alternate routing, and protection barriers;

9. All contractors shall be required to participate in a common carpool registry during all periods of contract performance monitored and maintained by the contractor;

10. Schedule construction-related deliveries, other than concrete and earthwork-related deliveries to reduce travel during peak travel periods;

11. Construction vehicle travel through neighboring jurisdictions other than the City of Los Angeles shall be conducted in accordance with the standard rules and regulations established by the respective jurisdictions where such jurisdictions would be subject to construction impacts. These include allowable operating times for construction activities, truck haul routes, clearance requirements, etc.;

12. Prior to the issuance of any permit for the Project, required permits for the truck haul routes, if applicable, shall be obtained from the City of Los Angeles;

13. Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities; and

14. Submit a traffic management plan to Caltrans for approval to avoid potential access restrictions to and from Caltrans facilities.

Mitigation Measure H-1 provides that the Applicant or its successor shall implement fugitive dust control measures during Project construction in accordance with South Coast Air Quality Management District Rule 403. The Applicant or its successor shall include in construction contracts the fugitive dust control measures in accordance with South Coast Air Quality Management District Rule 403, with construction controls being at least as effective as the following:

- Watering active construction areas at least twice daily to minimize fugitive dust emissions

- Maintaining soil stabilization of inactive construction areas with exposed soil via water, non-toxic soil stabilizers, or replaced vegetation;

- Suspending earthmoving operations or requiring additional watering to meet Rule 403 criteria if wind gusts exceed 25 mph;

- Covering all haul trucks or maintaining at least 6 inches of freeboard;

- Minimizing track-out emissions; and
- Limiting vehicle speeds to 15 miles per hour or less in staging areas and on-site haul roads.

Comment No. 18-8

- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,

Response to Comment No. 18-8

The mitigation requested by the comment is already addressed by Mitigation Measure B-41, as discussed on page 681 in Section IV.B.1, Traffic/Access – Traffic/Circulation of the Draft EIR, and Mitigation Measure H-1, as discussed on pages 1522–1523 in Section IV.H, Air Quality, of the Draft EIR. The commenter is also referred to Response to Comment No. 18-7, above, for a description of the referenced mitigation measures.

Comment No. 18-9

- Reroute construction trucks away from congested streets or sensitive receptor areas,

Response to Comment No. 18-9

The mitigation requested by the comment is already addressed by Mitigation Measure B-41. The commenter is also referred to Response to Comment No. 18-7, above, for a description of the referenced mitigation measure.

Comment No. 18-10

- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation,

Response to Comment No. 18-10

To address the comment, the following addition has been incorporated into the Final EIR (see Corrections and Additions No. IV.H.C, Section II, of this Final EIR):

Comment No. 18-11

- Improve traffic flow by signal synchronization, and ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers' specifications,

Response to Comment No. 18-11

The mitigation requested by the comment is already addressed by Mitigation Measure B-41, as discussed on page 681 in Section IV.B.1, Traffic/Access – Traffic/ Circulation, of the Draft EIR, and Mitigation Measure H-1, as discussed on pages 1522–1523 in Section IV.H, Air Quality, of the Draft EIR. The commenter is also referred to Response to Comment No. 18-7 above for a description of the referenced mitigation measure.

Comment No. 18-12

- Use coatings and solvents with a VOC content lower than that required under AQMD Rule 1113,

Response to Comment No. 18-12

To address the comment, the last bullet under Mitigation Measure H-1 has been modified (see Corrections and Additions No. IV.H.B, Section II, of this Final EIR):

Comment No. 18-13

- Construct or build with materials that do not require painting,

Response to Comment No. 18-13

To address the comment, the following addition has been incorporated into the Final EIR (see Corrections and Additions No. IV.H.F, Section II, of this Final EIR):

Comment No. 18-14

- Require the use of pre-painted construction materials.

Response to Comment No. 18-14

To address the comment, the following addition has been incorporated into the Final EIR (see Corrections and Additions No. IV.H.D, Section II, of this Final EIR):

Comment No. 18-15

- Require the use of 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export),

Response to Comment No. 18-15

To address the comment, the following addition has been incorporated into the Final EIR (see Corrections and Additions No. IV.H.E, Section II, of this Final EIR):

Comment No. 18-16

- During project construction, all internal combustion engines/construction equipment operating on the project site shall meet EPA-Certified Tier 2 emissions standards, or higher according to the following:

  - ✓ Project Start, to December 31, 2011: All offroad [sic] diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad [sic] emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

  - ✓ January 1, 2012, to December 31, 2014: All offroad [sic] diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad [sic] emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

  - ✓ Post-January 1, 2015: All offroad [sic] diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- ✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

- ✓ Encourage construction contractors to apply for AQMD "SOON" funds. Incentives could be provided for those construction contractors who apply for AQMD "SOON" funds. The "SOON" program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website: http://www.aqmd.gov/tao/Implementation/SOONProgram.htm

Response to Comment No. 18-16

To address the comment, a new mitigation measure has been incorporated into the Final EIR (see Corrections and Additions No. IV.H.G, Section II, of this Final EIR).

In addition, Comment No. 18-16 recommends encouraging construction contractors to apply for SCAQMD "SOON" funds, which is a program that potentially provides financial incentives to accelerate clean up of off-road diesel vehicles. This portion of the comment does not address the environmental analysis in the Draft EIR. The comment is noted and has been incorporated into the Final EIR for the review and consideration of the decision maker.

Comment No. 18-17

For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website: www.aqmd.gov/cega/handbook/mitigation/MM intro.html.

Response to Comment No. 18-17

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 18-18

Mitigation Measures for Operational Air Quality Impacts

3. The lead agency's operational air quality analysis demonstrates significant air quality impacts from NOx, CO and VOC emissions. These impacts are primarily from an increase in mobile source emissions related to a significant increase of vehicle trips associated with the proposed project. However, the lead agency fails to adequately address this large increase in mobile source emissions and only requires nominal mitigation measures to address the project's mobile source emission reductions. Therefore, the AQMD staff

recommends that the lead agency further reduce the project's significant air quality impacts by reviewing and incorporating the transportation mitigation measures in the greenhouse gas quantification report[4] that are not included the final EIR.

[4] *California Air Pollution Control Officer's Association. August 2010. Quantifying Greenhouse Gas Mitigation Measures, www.capcoa.org/wp-content/uploads/2010/111CAPCOA-Quantification-Report-9-14-Final. pdf*

Response to Comment No. 18-18

The comment recommends reviewing the "transportation mitigation measures" identified in a report issued by the California Air Pollution Control Officer's Association ("CAPCOA") related to quantifying greenhouse gas emissions (the "CAPCOA Report")[41] as a potential means to reduce the Project's operational emissions. The CAPCOA Report is "primarily focused on the quantification of project-level mitigation of greenhouse gas emissions." (CAPCOA Report, page 1.) The quantification measures are "intended to further support the efforts of local governments to address the impacts of GHG emissions." (CAPCOA Report, page 4.) Accordingly, the commenter is referred to Section IV.O, Climate Change, of the Draft EIR for a discussion of the Project's potential impact on climate change and the analysis provided therein.

The Project is consistent with applicable transportation measures identified in the CAPCOA Report. The Project is a high-density, mixed-use development in close proximity to a variety of existing land uses. The Project is located near major freeways, mass transit infrastructure (i.e., within 0.25 mile of the Universal City Metro Red Line Station [subway], Metro Orange Line [bus]), and downtown Los Angeles. The Project places high-density residential uses, jobs, and other services in close proximity to existing uses while supporting a variety of transit options. This has the dual benefit of shortening travel times and making mass transit more viable, effectively reducing vehicle miles traveled and vehicle trips to jobs and services (e.g., shopping, recreation, entertainment). The Project would also implement a Transportation Demand Management program to encourage alternative modes of travel and reduce vehicle trips.

The commenter is referred to Topical Response No. 4: Transportation Demand Management Program, in Section III.C, Topical Responses, of this Final EIR for more detail regarding the proposed Transportation Demand Management Program and Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR for a complete discussion of traffic-related issues and mitigation measures.

[41] *California Air Pollution Control Officer's Association. August 2010. Quantifying Greenhouse Gas Mitigation Measures, www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf*

Comment Letter No. 19

Dan Garcia
Air Quality Specialist
Planning, Rule Development, and Area Sources
Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4178
dgarcia@aqmd.gov

Comment No. 19-1

Regarding the NBC Universal Evolution Plan the South Coast Air Quality Management staff requests that your agency accept comments on the draft EIR up to Tuesday February 8, 2011 in order to allow us sufficient time to review the air quality modeling completed for the proposed project. We appreciate your consideration on this request. If you have any questions or concerns the appropriate contact information is enclosed.

Response to Comment No. 19-1

The comment requests that the Draft EIR comment period be extended to February 8, 2011. A public comment period for the Draft EIR was provided extending from November 4, 2010, to January 3, 2011, and was subsequently extended by the City Planning Department to February 4, 2011. This resulted in a 93-day written public comment period (November 4, 2010, through February 4, 2011), which substantially exceeds the 45-day minimum public review time period requirements set forth by the CEQA Guidelines (Section 15087(c)). In addition, a public comment meeting was held on December 13, 2010. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 20

Daniel Garcia
Air Quality Specialist
Planning, Rule Development, and Area Sources
Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765
dgarcia@aqmd.gov

Comment No. 20-1

Unfortunately, due to the holiday schedule AQMD staff has not had sufficient time to review the draft EIR for the NBC Universal Evolution Plan, therefore, we request additional time to submit comments on the proposed project. If possible AQMD staff would like one additional week until Tuesday January 11, 2011 to submit comments on the proposed project. Further, could you please provide us with the tentative schedule for the project's public hearing process. We highly appreciate your time and attention to this matter.

Response to Comment No. 20-1

The comment requests that the Draft EIR comment period be extended to January 11, 2011. A public comment period for the Draft EIR was provided extending from November 4, 2010, to January 3, 2011, and was subsequently extended by the City Planning Department to February 4, 2011, beyond the date requested in the comment. This resulted in a 93-day written public comment period (November 4, 2010, through February 4, 2011), which substantially exceeds the 45-day minimum public review time period requirements set forth by the CEQA Guidelines (Section 15087(c)). In addition, a public comment meeting was held on December 13, 2010. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 20-2

Given that I recently received the notice of extension for public comment on the NBC Universal Evolution Plan Draft EIR please disregard my previous e-mail request.

Response to Comment No. 20-2

The comment acknowledges that the comment period was extended beyond the date requested in Comment No. 20-1, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 21

Ben Wong
Local Public Affairs Region Director
Southern California Edison Company
(323) 720-5292

Comment No. 21-1

The Southern California Edison Company (SCE) appreciates the opportunity to review and provide comment on the DEIR for the NBC Universal Evolution Plan. SCE has been working closely with the project proponent, Universal City Studios LllP, [sic] L.P., to plan electricity service for this project.

The project is described in the DEIR as a proposal for a mixed-use development consisting of approximately 1.83 million square feet of net new entertainment, studio, office, and related uses, including up to 500 hotel guest rooms and related hotel facilities. In addition, 2,937 residential dwelling units, 115,000 square feet of retail/commercial and up to 65,000 square feet of community serving land uses are proposed. The plan also includes the demolition of approximately 638,000 square feet of existing studio, office, and entertainment uses. The project is proposed to be developed in a number of phases, with construction anticipated to be concluded by 2030, depending upon market conditions. Annexations are proposed between Los Angeles County and the City of Los Angeles: approximately 76 acres (19 percent) of the project site are proposed to be annexed from the County into the City, and the City is detaching approximately 32 acres (8 percent) of the project site from the City's jurisdiction into the County.

Response to Comment No. 21-1

The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. The comment accurately summarizes the referenced aspects of the proposed Project as described in Table 2 on page 280 as well as the annexation acreages stated on page 284 in Section II, Project Description, of the Draft EIR. Specific comments regarding the environmental analysis in the Draft EIR are provided and responded to below.

Comment No. 21-2

The Project Scope includes SCE's facility upgrades necessary to serve the County portion of the proposed project under both the Annexation and No-annexation scenarios. Under the annexation scenario, SCE would be serving the County portion of the project site through the relocation and upgrade of the customer-dedicated Studio Master Substation,

which includes the addition of a new 66 kV subtransmission line into the substation. Studio Master Substation would also have a Mechanical-Electrical Equipment Room to house all controls, switches, relay protection equipment, alarms, meters, batteries, HVAC and the station AC and DC distribution panels. Also, a new Applicant-owned and operated distribution substation east of the existing Studio Master Substation is proposed. In addition, there may also be a need for an SCE-owned distribution station located onsite.

Response to Comment No. 21-2

The comment accurately summarizes aspects of Project Design Feature L.4-2 discussed on pages 1951–1952 in Section IV.L, Utilities – Electricity of the Draft EIR and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 21-3

Under the No-annexation scenario, in addition to the above, in order to serve the proposed mixed-use residential land uses on the east side of the project site remaining in the county, a new 16 kV distribution line from the MacNeil Substation to the project site, along with associated infrastructure are proposed. In the event electricity is supplied to this area by SCE facilities other than the MacNeil Substation, a new substation may be required on the County portion of the project site to serve the new demand. SCE's comments on the DEIR are to clarify and/or correct information pertaining to SCE's proposed electrical facilities necessary to support the project and to address the noise analysis as it pertains to SCE's scope of work.

Response to Comment No. 21-3

The comment accurately summarizes aspects of the project design features described under the No Annexation scenario on page 1933 in Section IV.L, Utilities – Electricity of the Draft EIR. The comments regarding the No Annexation scenario are acknowledged and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are provided and responded to below.

Comment No. 21-4

Clarifications/Corrections to SCE Electrical Facilities Descriptions

1. Page 1933, first bullet, third sentence reads "…The combined substations that would be operated by Southern California Edison would have a total capacity of 122 MVA and would supply power to the new Applicant-owned and operated distribution substation, which would distribute electricity within the County portion of the Project Site…" To clarify,

Universal Substation is an SCE Distribution Substation serving multiple customer accounts with different taxpayer IDs. Studio Substation is an SCE Customer Substation serving NBC Universal. Assuming annexation does not occur, SCE would expect to serve the new proposed residential and commercial load "within the County portion of the Project Site" from MacNeil Substation. Please correct this section as appropriate.

Response to Comment No. 21-4

The comment's suggestion to clarify that under the No Annexation scenario, Southern California Edison would expect to serve the County portion of the Project Site in the Mixed-Use Residential Area from MacNeil Substation has been incorporated into the Final EIR (see Correction and Addition Nos. IV.L.4.A and IV.L.4.K, Section II, of the Final EIR).

Comment No. 21-5

2. Page 1933, second bullet, states SCE would need an area for a new substation of up to approximately one acre. In fact, SCE would need an area from between 1-3 acres for a standard SCE substation. Depending on site conditions, one acre may be feasible, but would not be considered standard. Please revise this section.

Response to Comment No. 21-5

The comment references the standard size requirements for Southern California Edison substations; however, the portion of the Draft EIR the comment references is a Project Design Feature to implement distribution facilities as needed, rather than a substation. This clarification has been incorporated into the Final EIR (see Correction and Addition No. IV.L.4.B, Section II, of the Final EIR).

Comment No. 21-6

3. Pages 1946 and 1947, Table 178, and pages 1949 and 1950, Table 182, indicate SCE is expected to see its base load grow by approximately 95,000 MVA. SCE's recent annual system peak demands have been on the order of 22,000 – 23,500 MVA. The DEIR projection represents an approximate 400% increase over 20 years or a 20% annual load growth across the SCE system. SCE estimates its base would grow by approximately 8,000 – 10,000 MVA, only. Please correct this section to include the revised estimate.

Response to Comment No. 21-6

The growth data provided in the comment was not available at the time the Draft EIR was prepared and has been incorporated into the Final EIR. The estimated growth included in the Draft EIR is greater than the current data on forecasted growth that

Southern California Edison provided in the comment; therefore, the Draft EIR overestimates potential cumulative impacts. As stated in the Draft EIR, the Project's level of electrical demand is not cumulatively considerable and the Project's cumulative impacts would be less than significant (see Correction and Addition Nos. IV.L.4.G, IV.L.4.I, IV.L.4.J, and Appendix N-3.B, Section II, of the Final EIR).

Comment No. 21-7

4. Page 1952, first paragraph; indicates Studio Substation would be connected to "Universal Substation via subterranean electrical lines." Connecting Studio Substation to Universal Substation would occur on SCE's 66 kV subtransmission system and not at the 12 kV distribution level. Please clarify this portion of the project description in the DEIR wherever it appears.

Response to Comment No. 21-7

The comment's clarification that the Studio Master Substation would be connected to the Edison Universal Substation via Southern California Edison's 66 kV subtransmission system and not at the 12 kV distribution level has been incorporated into the Final EIR (see Correction and Addition No. IV.L.4.B, Section II, of the Final EIR).

Comment No. 21-8

5. Page 1952, third bullet, should include in the MacNeil Substation improvement description the following additional electrical project elements; [sic] "new 66 kV breakers, switchrack, 66/16 kV transformers, a 16 kV switchrack, 16 kV capacitors, and 16 kV breakers would also likely need to be constructed at MacNeil Substation so that SCE could provide 16 kV distribution circuitry." Please note, while the necessary station work would be performed within the existing fence, there is a residence immediately next door.

Response to Comment No. 21-8

The comment notes that the MacNeil Substation improvements would likely include new 66 kV breakers, switch rack, 66/16 kV transformers, a 16 kV switch rack, 16 kV capacitors, and 16 kV breakers so that Southern California Edison could provide 16 kV distribution circuitry. As noted on page 1955 of the Draft EIR, in the event that modifications to the MacNeil Substation are required (i.e., Project development occurs under the No Annexation Scenario), Southern California Edison has indicated that it would perform the modifications to the MacNeil Substation, including the installation of new transformers, switch racks, and a new capacitor bank. As the comment notes, the MacNeil Substation improvements, if necessary, would be performed within the existing substation property. The comment also notes that there is a residence adjacent to the MacNeil Substation. Potential impacts associated with off-site electrical system improvements,

including the MacNeil Substation improvements, are evaluated in Section IV.L.4.6.b.(1), (3), and (4) (see pages 1958–1964 of the Draft EIR). As explained on page 1963 of the Draft EIR, the types of construction air quality and noise impacts described in the Draft EIR with respect to the transmission line(s) are also applicable to the proposed substation modifications with the only differences being that the impacts would occur within a smaller geographic area (i.e., the area immediately surrounding the MacNeil Substation, and the impacts would last for a somewhat longer duration (i.e., a few months versus a few weeks). As discussed in the Draft EIR, construction air quality impacts would be less than significant, whereas construction noise impacts at noise sensitive locations that are located within a couple of hundred feet of the MacNeil Substation could be significant during the short periods of time when heavy duty construction equipment is used given the incremental difference between construction noise levels and ambient noise levels in the area. Operational noise and air quality impacts would be reduced to less than significant levels through compliance with the City of Burbank's noise ordinance and through permitting by the South Coast Air Quality Management District. (See pages 1963-1964 of the Draft EIR).

Comment No. 21-9

6. Page 1953, Project Design Feature L.4-9, reads "Install LEDs for traffic and street lighting." This may be accurate if the customer wants to sign up for LS-3 service, but may not be accurate if the customer wants SCE to own the streetlights. Please note this project characteristic and/or determine the customer's/lead agency's intent.

Response to Comment No. 21-9

The comment's clarification that the Project Design Feature regarding LEDs for traffic and street lighting applies to private on-site traffic and street lighting has been incorporated into the Final EIR (see Correction and Addition Nos. IV.L.4.D, IV.L.4.M, IV.O.LL, and IV.O.UU, Section II, of the Final EIR).

Comment No. 21-10

7. Page 1954, Section b. (1), should include a statement that in order for SCE to provide a 16 kV distribution circuit from MacNeil Substation, SCE would need to perform modifications. Please revise this section accordingly. In addition, please revise Section L.4 Utilities – Electricity to note that all work proposed at MacNeil Substation constitute "modifications" rather than "upgrades". [sic]

Response to Comment No. 21-10

The comment's clarification that all work proposed at MacNeil Substation constitutes "modifications" rather than "upgrades" has been incorporated into the Final EIR (see

Correction and Addition Nos. IV.L.4.F, IV.L.4.N, IV.L.4.T, and Apendix N-3.C, Section II, of the Final EIR).

Comment No. 21-11

8. Page 1955 includes in its current description that SCE is planning to connect the possible 16 kV circuit from MacNeil Substation to an SCE substation that would be located within the Mixed-Use Residential Area (Annexation Area). Please strike this from the project description and revise to read "SCE would construct a distribution circuit to the residential development and install necessary cable, switches, transformers, services and meters."

Response to Comment No. 21-11

The comment's clarification that if Project development occurs under the No Annexation scenario the MacNeil Substation would be modified rather than a new Southern California Edison substation installed in the Mixed-Use Residential Area has been incorporated into the Final EIR (see Correction and Addition No. IV.L.4.O, Section II, of the Final EIR).

Comment No. 21-12

9. Page 1956, first bulleted item, should refer to 66 kV work associated with the 66 kV subtransmission work and not the 16 kV distribution work. Please note this in the description as appropriate.

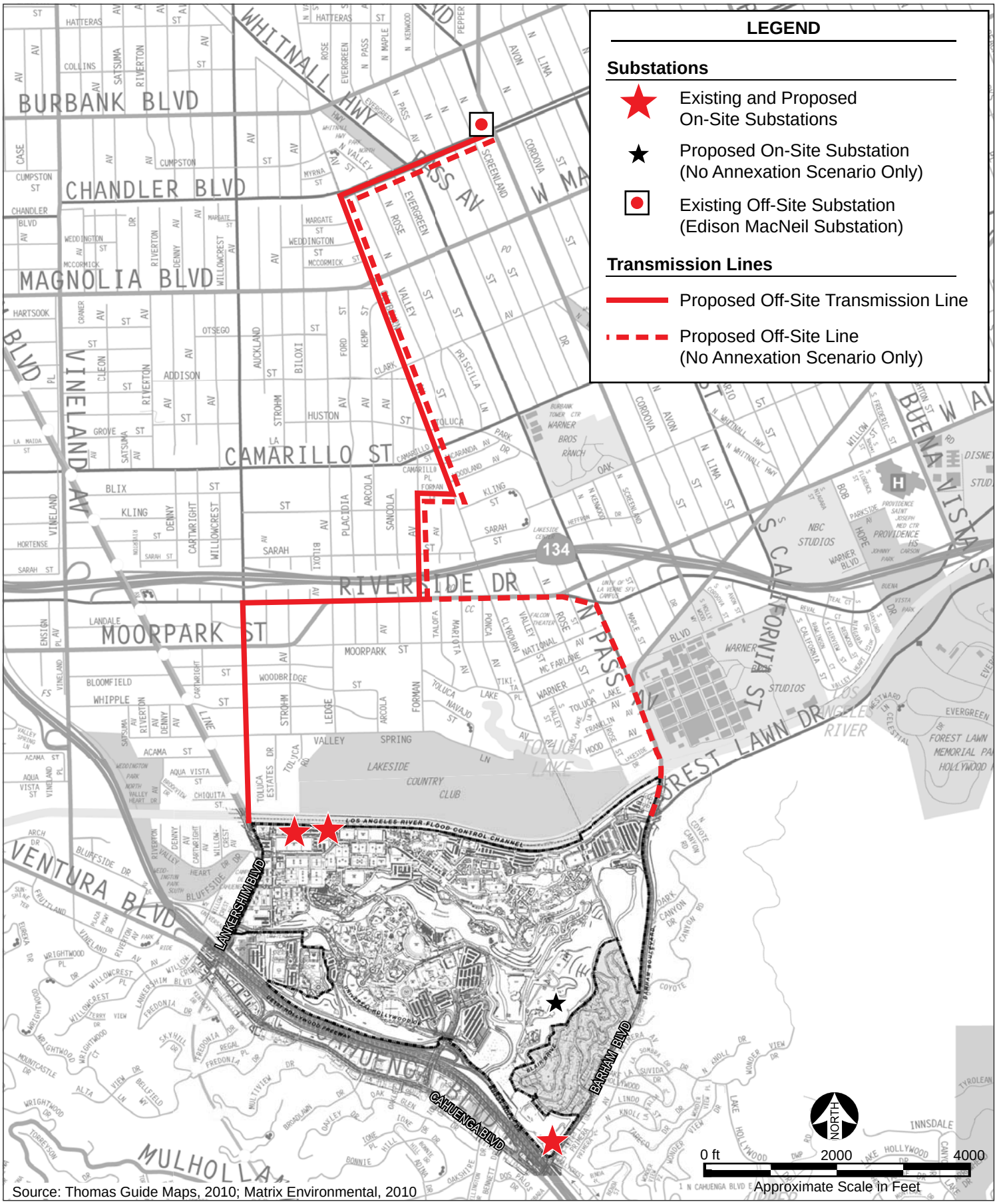
Response to Comment No. 21-12

The comment's clarification that the information described on page 1956 of the Draft EIR refers to work associated with the 66 kV line and not the 16 kV distribution work has been incorporated into the Final EIR (see Correction and Addition Nos. IV.L.4.P and IV.L.4.Q, Section II, of the Final EIR).

Comment No. 21-13

SCE's CPUC CEQA Permitting Requirements

Electric facilities between 50 and 200 kV are subject to the California Public Utilities Commission's (CPUC's) Permit to Construct (PTC) review specified in the CPUC's General Order (GO) 131-D, Section III.B. For facilities subject to PTC review, or for facilities over 200 kV subject to Certificate of Public Convenience and Necessity (CPCN) requirements specified in GO 131-D, Section III.A, the CPUC reviews utility PTC or CPCN applications pursuant to the California Environmental Quality Act (CEQA) and serves as lead agency under CEQA.



Source: Thomas Guide Maps, 2010; Matrix Environmental, 2010

matrix environmental

Figure 6

Location of Existing and Proposed On-Site and Off-Site Substations and Off-Site Transmission Lines

Certain work, such as activities which do not increase the maximum service voltage of a substation beyond the voltage for which a substation has been previously rated, or activities which do not result in an increase in substation land area beyond the existing utility-owned or controlled property; are considered substation modification projects under GO 131-D, and are not subject to the CPUC's discretionary permitting requirements in GO 131-D (GO 131-D, Section III.B).

For activities subject to GO 131-D, the rule provides for certain exemptions from the CPUC PTC requirements for facilities between 50 and 200 kV. For example, Exemption g (Section III.B.1.g) allows for the construction or relocation of power lines between 50 and 200 kV in an existing franchise, road-widening setback easement or public utility easement.

Other exemptions include Exemption f (Section III.B.1.f), which exempts from CPUC PTC permitting requirements power lines or substations between 50 and 200 kV to be constructed or relocated that have undergone environmental review pursuant to CEQA as part of a larger project, and for which the final CEQA document (EIR or Negative Declaration) finds no significant unavoidable environmental impacts caused by the proposed line or substation.

Based on a preliminary review of the proposed SCE facilities and activities identified to serve the NBC Universal Project, SCE anticipates that certain facilities and activities may be subject to GO 131-D PTC requirements or exemptions thereof (e.g., expansion of Studio Substation, and the new 66 kV line between MacNeil and Studio Substation), while other activities such as modifications to MacNeil Substation and construction of new 16 kV distribution lines are not subject to GO 131-D permitting requirements. With respect to the new off-site 66 kV line, it is not clear at this time if it may be eligible for Exemption g (i.e., if it can be constructed within existing franchise or easements). However, SCE assumes the expansion of Studio Substation would be considered a substation upgrade and not a modification under GO 131-D and thus subject to the CPUC permitting requirements.

Therefore, it is beneficial for the DEIR to include a description and evaluation of impacts of all SCE facilities and activities necessary to serve NBC Universal Evolution project, whether they may or may not be subject to GO 131-D permitting requirements or eligible for other GO 131-D exemptions, as SCE may or may not be able to rely upon GO 131-D Exemption f, if the Final EIR finds no significant unavoidable environmental impacts caused by the SCE scope of work.

Response to Comment No. 21-13

The comment describes certain California Public Utility Commission permit requirements for electric facilities and Southern California Edison's preliminary review of potential applicable requirements. The comment is noted and has been incorporated into

the Final EIR for consideration by the decision-makers prior to any action on the Project. Section IV.L.4, Utilities – Electricity, of the Draft EIR, includes a description and evaluation of potential impacts associated with Southern California Edison improvements in connection with the proposed Project. (See pages 1954–1964 of the Draft EIR for a discussion of off-site improvements).

Comment No. 21-14

Currently, however, the DEIR indicates that a significant unavoidable impact to Noise may occur for the SCE off-site improvements discussed in the Utilities – Electricity section. In addition, the DEIR Air Quality and Noise sections conclude that on-site construction activities have the potential to result in significant unavoidable impacts. If feasible, SCE requests the lead agency to consider additional analysis, and/or mitigation measures agreeable to the applicant and SCE, which may avoid a conclusion of a significant unavoidable impact to Air Quality and Noise for the on-site scope of work (e.g., the expansion of Studio Substation) and may avoid a significant unavoidable impact to Noise for the off-site SCE scope of work. If it is infeasible to determine that SCE's scope of work does not result in significant unavoidable environmental impact, SCE will not be able to utilize Exemption f. However, SCE may be able to use the Final EIR as part of an "expedited" PTC application at the CPUC. SCE would be happy to meet with the Applicant and the lead agency to discuss this request and GO 131-D permitting requirements, exemptions, options, and concerns, as well as the regulatory timeframes at the CPUC associated with the various permitting options.

Response to Comment No. 21-14

The comment is noted and has been incorporated into the Final EIR for consideration by the decision-makers prior to any action on the Project. The Applicant will continue to work with Southern California Edison with respect to improvements necessary to serve the proposed Project.

Comment No. 21-15

Once again, SCE appreciates the opportunity to review and comment on the DEIR for the NBC Universal Evolution Plan and looks forward to working with the project proponent and the City in planning to meet the electricity needs for this project and in addressing SCE's scope of work in the DEIR. If you have any questions regarding our comments, please feel free to contact me at (323) 720-5292.

Response to Comment No. 21-15

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 22

Zev Yaroslavsky
Supervisor, Third District
Board of Supervisors
County of Los Angeles
821 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012
zev@bos.lacounty.govs

Comment No. 22-1

Your Department had previously granted an extension of the comment period on the NBC Universal Draft Environmental Impact Report (DEIR) following requests from both Councilman Tom LaBonge and myself. I appreciated your granting of that extension.

However, given the enormous scope and complexity of this environmental document - the magnitude of which only became fully apparent to the community after the release of the DEIR - a number of community members have raised concerns that they will not have time to complete their review by February 4th. Given the massive scope of the document, and the fact that this comment period is also occurring during the holiday season, an extension of one additional month is warranted.

I therefore respectfully request that your Department extend the public comment period on the DEIR at least to March 4, 2011 to give all interested parties a full opportunity to review this document. Thank you again for your attention to this request, and your support of full community involvement in this vital process.

Response to Comment No. 22-1

The comment requests that the Draft EIR comment period be extended to March 4, 2011. The Draft EIR was originally circulated for public review for a 61-day period, or 16 days more than the CEQA required 45-day review period. This 61-day comment period began on November 4, 2010, and ended on January 3, 2011. In response to requests to extend the review period, on November 18, 2010, the City of Los Angeles extended the comment period by an additional 32 days to February 4, 2011. Thus, the Draft EIR was circulated for a 93-day public review period, which is more than double the 45-day public review period required by *CEQA Guidelines* Section 15105 when a Draft EIR is submitted to the State Clearinghouse for review by state agencies. In addition, a public comment meeting was held on December 13, 2010.

Consistent with CEQA requirements, public participation in the EIR preparation process also occurred during the scoping period for the EIR. In July 2007, the City filed and circulated for a 30-day public review a Notice of Preparation for the Draft EIR to receive public input on the scope of the Draft EIR. In addition, a public scoping meeting was held on August 1, 2007.

With respect to the Draft EIR's scope, as required by CEQA Guidelines Section 15151, the Draft EIR provides decision-makers with a sufficient degree of information and analysis for a project of this scope to enable them to make a decision which fully takes into account the Project's potential environmental consequences. As per CEQA Guidelines Section 15123, the Draft EIR includes an executive summary which provides a comprehensive summary of the complete content of the Draft EIR, including impact areas, mitigation measures, and areas of controversy. Consistent with CEQA Guidelines Section 15147, the information contained in the Draft EIR included summarized technical data, maps, diagrams, and similar relevant information sufficient to permit a full assessment of the Project's potential significant environmental impacts by reviewing agencies and members of the public. The Draft EIR summarized technical and specialized analysis in the body of the Draft EIR and attached technical reports and supporting information as appendices to the main body of the Draft EIR, consistent with CEQA requirements. (See CEQA Guidelines Section 15147.) The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 23

Zev Yaroslavsky
Supervisor, Third District
Board of Supervisors
County of Los Angeles
821 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, CA 90012
zev@bos.lacounty.gov

[Note: A duplicate of the letter provided below was received on 11/9/10]

Comment No. 23-1

On Thursday, November 4th your Department released the draft Environmental Impact Report (DEIR) for the "NBC Universal Evolution Plan" with a 60-day comment period during which members of the public can review and comment on this nearly 2,500 page, five-volume document.

I understand that CEQA only requires a 45-day comment period, and that you have already exceeded that minimum time period. However, given the scope of the information in this DEIR, as well as the magnitude of the proposed project, 60 days is simply not enough-particularly given that the current comment period would end just two days after the New Year's holiday. I therefore ask that you extend the comment period by a minimum of 30 additional days.

NBC Universal's proposed project is a massive undertaking and it is vital that the involved Planning departments provide ample opportunities for potentially-affected residents to participate in this important public process. I hope that you will promptly grant this request and appropriately notify members of the public about the additional time they have to comment on the NBC Universal DEIR.

Thank you for your attention to this matter.

Response to Comment No. 23-1

The comment requests that the original Draft EIR comment period, which was to end on January 3, 2011, be extended by at least 30 days. Consistent with the comment's request, the public comment period for the Draft EIR, which was initially scheduled to run from November 4, 2010, to January 3, 2011, was extended by the City Planning Department to February 4, 2011. This resulted in a 93-day written public comment period (November 4, 2010, through February 4, 2011), which is more than double the 45-day

public review period required by *CEQA Guidelines* Section 15105 when a Draft EIR is submitted to the State Clearinghouse for review by state agencies. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 24

Joan Rupert
Section Head
Planning and Development Agency
County of Los Angeles
Department of Parks and Recreation
510 South Vermont Ave.
Los Angeles, CA 90020
jrupert@parks.lacounty.gov

Comment No. 24-1

Please find attached the County of Los Angeles Department of Parks and Recreation's response to the above mentioned project.

Response to Comment No. 24-1

The introductory comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 24-2

NOTICE OF COMPLETION (NOC) AND AVAILABILITY (NOA) OF DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR) NBC UNIVERSAL EVOLUTION PLAN CASE NO. ENV-2007-0254-EIR STATE CLEARINGHOUSE NO. 2007071036

The NOC/NOA of the DEIR for the above project has been reviewed for potential impacts on the facilities of this Department We have determined that the proposed project will not affect any Departmental facilities.

Thank you for including this Department in the review process. If we may be of further assistance, please contact Julie Yom at (213) 351-5127 or jyom@parks.lacounty.gov.

Response to Comment No. 24-2

The County Department of Parks and Recreation's conclusion that the Project would not affect any Departmental facilities supports the conclusion presented in Section IV.K.4, Public Services – Parks and Recreation, of the Draft EIR that impacts to County park and recreational facilities under the proposed Project would be less than significant. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 25

Don Tran
LA Sheriff Department
Facility Planning Bureau
Dtran@lasd.org

Comment No. 25-1

We're in receipt of the City of LA Dept. of Planning the REVISED Notice of Completion & Availability of the Draft Environmental Impact Report (DEIR) for NBC Universal Evolution Plan dated 11/18/10 this week. In the beginning of the month we also received the Request of Comments on the DEIR on the City letter dated on 11/4/10. Its due date is 1/3/11. There were 2 cd rom [sic] attached to this letter. I have 2 questions:

1. Base [sic] on the heading of the Revised Notice of Completion & Availability of the Draft EIR that we received this week: Does it mean the review process for the draft EIR has been complete and your dept is issuing the review of the completion of the DEIR? If so, my CD roms (sent along with the 11/4/10 City letter) are obsolete. Should I ask for the current cd?

Response to Comment No. 25-1

The commenter asks about the document circulated for public review and the dates of public review. The Draft EIR public review period started on November 4, 2010, with the City's issuance of a Notice of Completion and Availability and submittal to the State Clearinghouse, Office of Planning and Research indicating the release of the Draft EIR for public review and comment. Public notices of the availability of the Draft EIR for review were provided in local newspapers, posted at the Project Site, as well as at local libraries and government offices, and mailed to property owners, in accordance with Section 15085 of the CEQA Guidelines. In addition, public notices were mailed to a large list of interested parties and government agencies. This comment period on the Draft EIR began on November 4, 2010, and was initially scheduled to end on January 3, 2011. In response to requests to extend the review period, on November 18, 2010, the City of Los Angeles extended the comment period by an additional 32 days to February 4, 2011. The Revised Notice of Completion and Availability referenced in the comment provided notice of the extension of the public comment period. There was no change to the Draft EIR during the public review period.

Comment No. 25-2

2. The Notice of Completion and Availability of the EIR dated 11/18/10 also refers the deadline extension from 1/3/11 to 2/4/11. Does it mean these two documents are the same? Why didn't the subject on the first document dated 11/4 mention about the Completion and Availability of the DEIR as the 11/18 letter did?

Advise!

Response to Comment No. 25-2

The commenter asks about the notices issued with the Draft EIR when it was circulated for public review. The City issued the Notice of Completion and Availability on November 4, 2010, and again on November 18, 2010. The second notice was to inform the public that the review period had been extended by 32 days to February 4, 2011. Both the original Notice of Completion and Availability of the Draft Environmental Impact Report and the Revised Notice of Completion and Availability of the Draft Environmental Impact Report referred to the availability of the Draft EIR.

Comment Letter No. 26

Michael D. Forbes
Assistant Community Development Director/City Planner
City of Burbank
275 E. Olive Ave.
P.O. Box 6459
Burbank, CA 91510-6459
www.ci.burbank.ca.us

Comment No. 26-1

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

Response to Comment No. 26-1

The introductory comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the environmental analysis in the Draft EIR are provided and responded to below.

Comment No. 26-2

Traffic and Transportation

1. Travel Demand Model/Growth Forecasts

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

The revised model used for the Alternative Impact Analysis for the city of Burbank (DEIR Exhibit E – Transportation Study Appendix F) includes a more detailed street network for Burbank as well as refined network link attributes for number of travel lanes, capacity, and speed parameters. The model also includes a more detailed traffic analysis zone structure and centroid connectors that satisfactorily simulates intersection volume assignments and existing traffic patterns in the city. In addition, at the City's request the project study area

was expanded to include eight additional intersections in Burbank, bringing the total number of studied intersections in the city to 36. The modified travel demand model was used to distribute and assign project traffic to Burbank streets, and the output from this modified model was used to identify significant traffic impacts in the City of Burbank under the Alternative Impact Analysis.

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

Response to Comment No. 26-2

The NBC Burbank Transportation Model is summarized in Appendix F to the *Transportation Study for the NBC Universal Evolution Plan Environmental Impact Report*, included as Appendix E-1 to the Draft EIR. As stated by the commenter, the NBC Burbank Transportation model was developed, calibrated, validated and applied to produce travel forecasts for future conditions with and without the Project working closely with the City of Burbank's transportation modeling staff. The City of Burbank approved the travel demand model after a very detailed examination of not only the existing calibration but also the performance of the model in the prediction of future forecasts. This included sharing and use of socio-economic data from the Burbank Modeling databases for special generators as well as other areas within the City of Burbank. All data, including cumulative (related) project data, provided by the City of Burbank was included in the NBC Burbank Transportation model process. Trip generation, trip distribution, and assignment results were all provided to the City of Burbank transportation modeling staff and examined by the staff prior to the approval of the NBC Burbank Transportation Model referred to in the comment.

The comment also references an attached December 2009 letter from the City of Burbank, however there was no attachment provided to the comment letter. Based on the description of the letter in the comment, it appears to be a December 21, 2009, letter from Mr. David Kriske, City of Burbank, to Mr. Pat Gibson, P.E., which letter is included in its entirety as Comment No. 26-42. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-3

The City has identified error in the cumulative projects list included in the DEIR (DEIR Exhibit E – Transportation Study, Table 10: Trip Generation Estimates for Cumulative

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

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

Response to Comment No. 26-3

For existing year (2007) and future conditions, the City of Burbank staff provided the special generators land use and growth information within the City of Burbank from the City of Burbank Transportation Model to be included in the NBC Burbank Transportation Model forecasting process, including the information for the projects referenced in the comment. In addition, the cumulative (related) projects in the Draft EIR includes the City of Burbank General Plan Update (Related Project No. 12), which includes all Burbank long range projects, including projects that are not specifically identified on the related projects list. Therefore, the NBC Burbank Transportation Model included all the information in the development of forecasts for the future and verification of the same was conducted to ensure that the cumulative growth associated with the projects provided in the list of cumulative projects by the City of Burbank was included in the NBC Burbank Transportation Model. A comparison of the model assumptions for the Traffic Analysis Zones (TAZs) where these cumulative (related) projects are located to the trip generation of these cumulative (related) projects verified that the model accounted for all approved and entitled projects in the City of Burbank.

Comment No. 26-4

2. Trip Generation/Transportation Demand Management Credits

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

Response to Comment No. 26-4

The trip generation estimates of the Project's retail land uses within the Mixed-Use Residential Area were developed using rates from the *Trip Generation*, *7th Edition* (Institute of Transportation Engineers, 2003), a national standard used by the traffic engineering profession. The Institute of Transportation Engineers provides statistically derived equations (fitted-curves), as well as standard rates for various uses, and also provides cautionary guidance in the application of these rates/equations. When the size of a particular use is small (i.e., very different than the average size of the projects included in the sample set), the application of equations yields unreasonable results, because of the large constant term included in the equation (fitted-curves). The City of Los Angeles Department of Transportation, recognizing this, accepts the use of the standard rates instead of equations (fitted-curves) when appropriate for the type and size of the proposed use.

Similar to other small retail projects in the City of Los Angeles, the standard trip-generation rate was used to develop the trip estimates for the retail land uses instead of the statistically derived equations (fitted curve). Given the type and size of retail uses proposed in the Mixed-Use Residential Area, the standard trip generation rate is appropriate. The trip-generation estimates for the Project were reviewed and approved by

the Los Angeles Department of Transportation and the County of Los Angeles Department of Public Works.

It should be noted that as stated in the Los Angeles Department of Transportation's traffic assessment letter (*Traffic Assessment of the Proposed NBC Universal Evolution Plan Project*, April 2, 2010), attached as Appendix E-2 to the Draft EIR, the Project's trip generation will be monitored by the Los Angeles Department of Transportation, and the Project would be required to comply with the trip estimates and Transportation Demand Management (TDM) credits noted in the Draft EIR. As explained on page 6 of Appendix E-2 of the Draft EIR, the Project's TDM program would be required to include:

> "[A] periodic trip monitoring and reporting program that sets trip-reduction milestones and a monitoring program to ensure effective participation and compliance with the TDM goals; non-compliance to the trip-reduction goals would lead to financial penalties or may require the implementation of physical transportation improvements[.]"

Comment No. 26-5

In addition, a number of trip credits are taken from basic trip generation to account for factors like pass-by trips, internal capture trips, and non-motorized trips. The City believes that application of these credits on top of the already-low trip generation for the retail uses severely undercounts the trip generation. First, ITE provides as average pass-by trip generation credit of 34 percent, for shopping centers, while the traffic study applies a 40 to 50 percent credit. This is compounded with an additional credit for walking/cycling/internal capture trips that is inappropriate for the proposed uses, especially since the use of the shopping center rate (instead of explicit ITE rates for retail, restaurant, and other uses commonly found in a shopping center) already implies internal capture of trips due to the nature of a shopping center use. Because these large credits are compounded on top of an already-low trip generation rate (from the average rate instead of the fitted-curve rate), the City believes the trip generation is underestimated. The City requests the study utilize a lower, more realistic pass-by rate for the retail portions of the project.

Response to Comment No. 26-5

As noted on page I-25 in Appendix I of the Transportation Study (see Appendix E-1 of the Draft EIR), to provide a conservative analysis of potential Project trips for purposes of the Transportation Study, of the 180,000 square feet of proposed neighborhood retail and community-serving commercial uses in the Mixed-Use Residential Area: 115,000 square feet was assumed to generate trips comparable to community retail uses, 30,000 square feet was assumed to generate trips comparable to neighborhood-serving retail uses, and the remaining 35,000 square feet was assumed to generate trips comparable to community amenities. The trip-generation estimates account for a 40 percent pass-by

credit for the community retail uses and 50 percent pass-by credit for the neighborhood-serving retail uses. These credits are based on standard pass-by trip reductions that are allowed by Los Angeles Department of Transportation guidelines for retail uses (refer to Attachment G, LADOT Policy on Pass-By Trips in *Traffic Study Policies and Procedures* [Los Angeles Department of Transportation, March 2002, revised August 2003]). In addition, the *ITE Trip Generation Handbook* (Institute of Transportation Engineers, 2004) provides pass-by percentages from retail/shopping centers of various sizes from around the nation. Based on the data presented in the *ITE Trip Generation Handbook*, the smaller the retail center, the greater the percentage of pass-by trips. Given the type of retail development anticipated at the Project Site, the allowable pass-by rates per the Institute of Transportation Engineers would be greater than or consistent with the allowable rates published by the City of Los Angeles.

An additional 25 percent credit was utilized for walk and transit trips to the neighborhood-serving retail uses. No walk/transit credit was taken for the community retail uses. These credits are standard credits consistent with the transit credits outlined in LADOT Traffic Studies Policies and Procedures, May 2009 which allows a 15 percent transit credit for projects within 0.25 mile of a transit station or RapidBus stop. In the case of the Project, LADOT concurred that the provision of the internal shuttle system connecting the retail uses to the residential uses with frequent local service justified this level of transit credit. The remaining 10 percent were assumed to walk to the retail center from the adjacent/nearby residential units. These trip generation credits account for the neighborhood-serving nature of the uses and the fact that these uses are intended to serve the 2,937 residential dwelling units that are proposed within walking distance.

The City of Los Angeles Department of Transportation examined and approved all the rates, parameters, and assumptions utilized in the model development, calibration, validation and application of the NBCU Model for use in the Project's Transportation Study. (Draft EIR, Appendix E-2, *Traffic Assessment of the Proposed NBC Universal Evolution Plan Project*, April 2, 2010.)

Comment No. 26-6

Finally, it is possible that on top of these credits an additional Transportation Demand Management (TDM) credit was taken on the community and neighborhood retail portions of the project, although this is not clear from the study (DEIR Appendix E – Transportation Study Table 19 – Proposed Project TDM Program, page 287). The City does not believe that a TDM reduction is appropriate on the retail portions of the project due to the location of the retail in relation to transit.

Response to Comment No. 26-6

No reduction in trips was taken due to the TDM associated with the retail components, as shown in Table 19, Proposed Project TDM Program, of the Transportation Study, attached as Appendix E-1 to the Draft EIR.

Comment No. 26-7

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

Response to Comment No. 26-7

A detailed analysis of the trip generation of the entertainment-related uses was provided in Appendix I of the Transportation Study (see Appendix E-1, Transportation Study, of the Draft EIR). As set forth therein, the increased attendance to the Theme Park was accounted for in the trip generation by determining a relationship between the peak commuter weekday patronage and the corresponding annual patronage at the theme park. The yearly peak conditions at the Theme Park occur during the holiday and summer months and on weekend days. The peak commuter weekday on a non-summer and non-holiday week was determined to be representative of the overall conservative peak conditions system-wide, since it represents peak conditions on the adjacent street system, as well as the busiest commuter weekday conditions (Tuesday–Thursday) during a non-summer, non-holiday week at the Theme Park.

Based on data from the last ten years, a relationship between the peak commuter weekday patronage and the corresponding annual patronage at the Theme Park was determined. This relationship was then utilized to determine the projected peak commuter day patronage given the anticipated annual future patronage at the Theme Park. This was then utilized in the trip-generation analysis to obtain project trips (arrivals and departures) by time of day. CityWalk Retail peak patronage on the peak commuter weekday and peak

utilization at the Cineplex and a fully occupied Amphitheater were also assumed in the computation of peak-hour trip generation at the Project Site on a peak commuter non-holiday, non-summer weekday for both baseline and future conditions evaluation. In addition to these trips, trips associated with service and maintenance vehicles and trucks that serve the theme park and other entertainment components were estimated and added to get the total trip generation of the Entertainment Area. Finally, the total peak-hour Entertainment Area trips generated, as noted above, were allocated to specific TAZs in the same proportion as the number of parking spaces available in the lots that serve these uses.

More recently developed rides/attractions at the Theme Park have been large-footprint buildings that house rides with relatively low simultaneous patronage (as compared to prior guest shows that accommodate large groups simultaneously in theater-style presentations). Also, there is a physical and operational limit to the number of guests that can be accommodated within the Theme Park at the same time. Moreover, the addition of an attraction or ride may have limited or no effect on attendance growth and may be added to maintain attendance. Therefore, the increase in total square footage of buildings does not necessarily result in a proportional increase in the number of visitations on each day of the year.

Comment No. 26-8

The City also disagrees with the trip generation reduction claimed for the TDM program that is proposed to reduce the project's trip generation. In particular, the study is applying a 20 percent TDM reduction on the 2,937 new housing units proposed for the project. This is an extremely aggressive TDM reduction for housing units in Los Angeles, especially if the housing is targeting upper-income households, requires bus-to-rail transfers, and includes multiple free parking spaces for each housing unit. Other than the provision for free transit passes and a marginal proximity to the Metro Red Line (requiring either a long walk or a bus transfer), there is virtually no incentive for the residents of the housing units in the proposed project to shift to bus or rail. The City suggests that if an aggressive TDM reduction be proposed that it be coupled with equally-aggressive TDM measures such as parking pricing or unbundled free parking, reduced parking ratios (e.g. provide one space per unit), or direct proximity to the Metro Red Line Subway, Metro Rapid bus, or other high-capacity bus services. As proposed, the layout of the residential units in relation to transit amenities and the lack of any true disincentives to driving will not result in a 20 percent trip generation reduction on the housing portion of the project.

Response to Comment No. 26-8

The comment refers to the 20 percent TDM credit that has been accounted for the residential units proposed in the Mixed-Use Residential Area. As noted in Appendix K of

the Transportation Study (see Appendix E-1 of the Draft EIR), numerous studies across California and nationally, have found much higher trip reductions for residents living near rail stations. As explained on pages K-2 and K-3 of Appendix K of the Transportation Study (see Appendix E-1 of the Draft EIR):

> "Residents living near transit stations were found to be five times more likely to commute by transit compared to the average resident worker in the same city. On average, transit was reported as the primary commute mode for work trips by 26.5% (24.3% rail and 2.2% bus) and 1.9% for bike/walk by station-area residents. Transit was reported as the primary commute mode for non-work trips by 8.1% (5.3% rail and 2.9% bus) and 4.3% for bike/walk.
>
> A recent study by Chatman (*Transit-Oriented Development and Household Travel: A Study of California Cities*, Daniel G. Chatman, 2006) included a detailed data collection effort and analysis of travel behavior in the San Diego and San Francisco-Oakland-San Jose metropolitan areas. A total of 727 station-area workers were surveyed in 2005. The reported average transit mode-split for station-area workers was 12.9% (8.3% rail and 4.6% bus) and 6.4% bike/walk. The study also surveyed 1,113 households in 2003-2004. The reported average transit mode-split for station-area residents was 14.1% (12.0% rail and 2.1% bus) and 9.0% bike/walk."

Moreover, projects within Los Angeles County adjacent to mass-transit rail stations that are transit-oriented are allowed a 25 percent transit credit by the Los Angeles County Congestion Management Program. Therefore, the 20 percent trip reduction assumed in the Transportation Study represents a conservative estimate.

Further, the provision of a shuttle system, pursuant to Mitigation Measure B-2, is intended to directly link the Project's residential development to the Universal City Metro Red Line Station. As provided in Mitigation Measure B-2 in Section IV.B.1, Traffic/ Access – Traffic/Circulation, of the Draft EIR:

> "The Project shall provide a local shuttle system which provides enhanced transit service for Project residents, visitors, employees, and the surrounding community, focusing on providing connections to key destinations such as the Universal City Metro Red Line Station, downtown Burbank, Burbank Media District, Hollywood, Universal CityWalk, and other nearby destinations."

In addition, the easterly location of the residential portion of the Project puts the residents closer to the many entertainment-related jobs in the Burbank Media District and in Hollywood.

Regarding parking pricing or unbundled parking fees, in general, the proposed parking requirements for the Project, summarized in Section IV.B.2, Traffic/Access – Parking, of the Draft EIR and Chapter X of the Transportation Study (see Appendix E-1 of

the Draft EIR), were developed based on the Los Angeles County Code and the City of Los Angeles Municipal Code. The proposed City and County Specific Plans include provisions for modifications to minimum parking requirements and shared parking plans. The comment's suggestion regarding parking pricing and unbundling parking fees for the residential development in the Mixed-Use Residential Area, is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-9

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

Response to Comment No. 26-9

As described on page 191 of the Transportation Study (Appendix E-1 of the Draft EIR), a 16.5 percent TDM credit was used for only those uses adjacent to Lankershim Boulevard and the Universal City Metro Red Line Station. A lower, 10.0 percent, TDM credit was used in the Transportation Study (see Appendix E-1 of the Draft EIR) for the Project for the office and studio uses that are closer to the center of the Project Site.

As noted in Appendix K of the Transportation Study (see Appendix E-1, Transportation study, of the Draft EIR), numerous studies across California and nationally, have found much higher trip reductions for workers near rail stations. As explained on page K-2 and K-3:

> "TOD office workers were found to be more than 3.5 times as likely to commute by transit, an increase from the 2.7 times ratio found in the 1993 study. On average, transit was reported as the primary commute mode by 18.8% (11.5% rail and 7.3% bus) and 3.4% for bike/walk by station-area workers."
>
> and
>
> "A recent study by Chatman (*Transit-Oriented Development and Household Travel: A Study of California Cities*, Daniel G. Chatman, 2006) included a detailed data collection effort and analysis of travel behavior in the San Diego and San Francisco–Oakland–San Jose metropolitan areas. A total of 727 station-area workers were surveyed in 2005. The reported average transit mode-split for station-area workers was 12.9% (8.3% rail and 4.6% bus) and 6.4% bike/walk."

Therefore, the 10.0 percent and 16.5 percent trip reductions used for office uses in the Transportation Study present a conservative estimate. With regard to the parking requirements for the Project, please see Response to Comment No. 26-7, above.

Comment No. 26-10

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

Response to Comment No. 26-10

As noted in Chapter V of Transportation Study (see Appendix E-1, Transportation Study, of the Draft EIR):

> "A TMA will be formed on-site for the Project or if possible, the Project would become a part of an existing TMA in the Study Area. The goal of the TMA is to promote awareness of the available TDM strategies and create Transportation Management Plans (TMPs) for the employees, residents, and patrons of the Project and potentially to a broader area. Specific components of the TMA will include:
>
> - Rideshare matching
> - Administrative support for formation of vanpools and/or carpools
> - Bike and walk to work promotions
> - Emergency rides home
> - Preferential load/unload or parking location for high occupancy vehicles (HOV)
> - Transportation Information Center"

As noted above, the Transportation Management Association would service all employees, residents, and patrons of the Project Site. If the Applicant decides to join an existing TMA in the Study Area, such as the North Hollywood Transportation Management Association or the Burbank Transportation Management Association, the Applicant would pay the applicable fees to the Transportation Management Association. In the event that

the Applicant decides to start a new Transportation Management Association on the site, the Applicant would fund the Transportation Management Association. The decision to join an existing Transportation Management Association or to start a new Transportation Management Association on-site would be based on the needs of the Project employees, residents, and patrons. Both the proposed City and County Specific Plans include Transportation Demand Management regulations (see Section 7.1 of the proposed City Specific Plan included as Appendix A-1 to the Draft EIR and Section 14 of the proposed County Specific Plan included as Appendix A-2 to the Draft EIR).

Comment No. 26-11

3. Project Phasing and Mitigations

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

Response to Comment No. 26-11

As noted in the comment and the Transportation Study (see Appendix E-1 of the Draft EIR), the Project's mitigation phasing program has been designed such that the Project is required to implement all mitigation measures tied to each phase prior to moving onto the next development phase. As noted in the City of Los Angeles Department of Transportation's Assessment Letter dated April 2, 2010 (see Appendix E-2 of the Draft EIR):

> "Prior to the issuance of any building permit for each sub-phase, all on- and off-site mitigation measures for the sub-phase shall be complete or suitably guaranteed to the satisfaction of LADOT."
>
> and
>
> "Prior to the issuance of any temporary or permanent Certificate of Occupancy in the final sub-phase, all required improvements in the entire mitigation phasing plan shall be funded, completed, or resolved to the satisfaction of LADOT."

Consistent with the Los Angeles Department of Transportation's Assessment Letter, the proposed City and County Specific Plans provide that prior to issuance of the approval for a Project under the Specific Plan, the Department of Transportation assign traffic improvements, if any, to the Project from the approved Traffic Mitigation Phasing Plan. Further, the proposed City Specific Plan requires that prior to the issuance of a building permit for a Project under the City Specific Plan, the Applicant shall guarantee, to the satisfaction of the Department of Transportation, the construction of any required traffic improvements for the Project. (See Section 7.2 of the proposed Universal City Specific Plan included as Appendix A-I of the Draft EIR.) Similarly, the proposed County Specific Plan requires that prior to the issuance of a building permit for a Project, the Applicant provide documentation satisfactory to the County Regional Planning Director that the Applicant has guaranteed the construction of the required traffic improvements to the satisfaction of the City of Los Angeles Department of Transportation. (See Section 14 of the proposed Universal Studios Specific Plan included as Appendix A-2 of the Draft EIR.)

Additionally, the implementation of the proposed mitigation measures would be monitored by the Los Angeles Department of Transportation per their standard procedures employed in other development projects in the City of Los Angeles. As noted in the City of Los Angeles Department of Transportation's Assessment Letter, the Project's TDM program would be required to include:

> "[A] periodic trip monitoring and reporting program that sets trip-reduction milestones and a monitoring program to ensure effective participation and compliance with the TDM goals; non-compliance to the trip-reduction goals

would lead to financial penalties or may require the implementation of physical transportation improvements[.]"

The request for a hard trip caps on each phase is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-12

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

Response to Comment No. 26-12

Mitigation measures required as part of the Project's approvals would be the obligation of the Applicant or its successor and would be implemented and monitored pursuant to the Project's Mitigation Monitoring and Reporting Program. The commenter is referred to Response to Comment No. 26-11, above, for further information regarding the implementation of mitigation measures.

Comment No. 26-13

4. City of Burbank Alternative Impact Analysis Methodology

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

Response to Comment No. 26-13

The analysis presented for the City of Burbank intersections in Appendix F of the Transportation Study (see Appendix E-1 of the Draft EIR) is based on the City of Burbank's adopted significant impact criteria prior to the *Interim Traffic Study Guidelines* (City of Burbank, November 2007) because the traffic analyses for the Project were initiated prior to the adoption of the *Interim Traffic Study Guidelines*. This approach was approved by the City of Burbank Planning Department, and this clarification is incorporated as a correction and addition to the Draft EIR (see Correction and Addition No. Appendix E-1.A, Section II, of the Final EIR). The significant impact criteria used in the Appendix F analysis is summarized on page F-4 in Appendix F of the Transportation Study:

> "According to the City of Burbank's impact criteria, if the increase in the V/C ratio from Future without Project conditions to Future with Project conditions is 0.010 or more with the intersection operating at LOS E or F after the addition of the project traffic, the project's impact is considered significant. The project is not considered to have a significant impact if the intersection is projected to operate at LOS D or better after the addition of project traffic, regardless of the volume of traffic added to the intersection or the incremental change in the V/C ratio."

Based on data presented on pages F-2 and F-4 of the Transportation Study (see Appendix E-1 of the Draft EIR), the City of Burbank impact criteria used in Appendix F conforms to the City of Los Angeles significance threshold for LOS E and F intersections. A comparison of the impact analyses presented in Chapter V of the Transportation Study with that presented in Appendix F is provided on page F-14 in Appendix F (see Appendix E-1 of the Draft EIR) and is summarized as follows:

Intersection Impact Summary—Funded Improvements Scenario

Intersection	Residual Impacts Under the Los Angeles Department of Transportation Criteria	Residual Impacts Under City of Burbank Criteria
Intersection 82	X	

As shown in the table above, the impact analysis based on the City of Los Angeles' guidelines (Section IV.B.1.3.d and Section IV.B.1.6.a in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR and Chapter V and Appendix J of the Transportation Study) resulted in a residual significant impact at one intersection in the City of Burbank: Olive Avenue & Warner Brothers Studios Gate 2/Gate 3 (Intersection 82). However, under the City of Burbank's guidelines (Appendix F of the Transportation Study, see Appendix E-

1 of the Draft EIR), the Project's transportation mitigation program mitigated impacts at all of the intersections, including Intersection 82, to a less than significant level.

The comment also requests information on how the impacts identified in Appendix F of the Transportation Study were used to identify the mitigations in the Draft EIR, and whether or not the expanded list of 36 study intersections in Appendix F resulted in additional Project impacts. The traffic mitigation measures identified in the Draft EIR include improvements required to mitigate the intersection impacts under both the City of Los Angeles and the City of Burbank guidelines. In other words, the mitigation measures identified in Section IV.B.1.5 of the Draft EIR include measures to mitigate the impacts identified in Appendix F of the Transportation Study. (See pages 675–678 of Section IV.B.1., Traffic/Access – Traffic/Circulation, of the Draft EIR.) Regarding the expanded list of study intersections, the Study Area was expanded beyond that used in the Transportation Study to include 8 additional intersections in the City of Burbank (Intersections 165 through 172). As shown in Table F-4 in Appendix F of the Transportation Study, under the Future with Project Scenario, the Project results in a significant impact at only one of these eight intersections: Hollywood Way & Burbank Boulevard (Intersection 167). As shown in the table, the Project's impact at this location is mitigated to a less than significant level under the Future with Project with TDM scenario.

Comment No. 26-14

5. Traffic Signal Improvements

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

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

Pass at Verdugo (Intersection #75, B-27): Fully modify the traffic signal at this intersection for approximately $200K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network requiring 1500 feet of conduit and

fiber optic cable at a cost of $75K and the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.

- Cost $281K

Evergreen at Riverside (Intersection #77, B-28): This intersection requires minor traffic signal modification for approximately $50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network requiring including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.

- Cost $56K

Pass at 134 E/B off-ramp (Intersection #78, B-29): This intersection requires minor traffic signal modification for approximately $50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network requiring 1200 feet of conduit and fiber optic cable at a cost of $25K and the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.

- Cost $81K

Pass at Alameda (Intersection #79, B-30): This intersection requires minor traffic signal modification for approximately $50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.

- Cost $56K

Pass at Riverside (Intersection #80, B-31): This intersection requires minor traffic signal modification for approximately $50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.

- Cost $56K

Pass at Olive (Intersection #81, B-32): Modify the traffic signal at this intersection for approximately $100K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.

- Cost $106K

Olive and Warner Brothers Studio Gate 2/Gate3 (Intersection #83, B-33): This intersection requires minor traffic signal modification for approximately $50K. Connect this

intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.

- Cost $56K

Olive and Warner Brothers Studio Gate 1/Lakeside (Intersection #83, B-34): Fully modify the traffic signal at this intersection for approximately $250K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.

- Cost $256K

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

- Cost: $6K

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

- Cost $256K

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

- Cost: $56K

Response to Comment No. 26-14

The comment notes that the Project proposes traffic signal improvements at certain intersections within the City of Burbank and that the City of Burbank generally approves of the approach. The comment then specifies additional detail on the traffic signal improvements and their estimated cost at a total of 11 intersections. The mitigation measures proposed in the Draft EIR at the identified intersections are consistent with the comment (see Mitigation Measures B-27 through B-37). And, as noted in Response to Comment No. 26-13, above, under the City of Burbank's guidelines the Project's

transportation mitigation measures mitigate Project impacts at all of the studied intersections. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-15

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

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

- Cost: $200K

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

- Cost $500K

Verdugo between Hollywood Way and Buena Vista (not identified in the DEIR): Staff believes since this segment connects to an impacted corridor, it should be interconnected to provide and enhance coordination.

- Cost: $250K

Response to Comment No. 26-15

As shown in Tables 31, 32, 39, and 40 in Section IV.B.1, Traffic/Access – Traffic/ Circulation, of the Draft EIR and the analysis presented in Appendix F of the Transportation Study (see Appendix E-1 of the Draft EIR), the Project does not result in a significant impact at the intersection of Pass Avenue & Oak Street (Intersection 76) under any of the

analyzed scenarios. Therefore, the Project is not required to provide traffic signal improvements at this location.

A total of three signalized intersections exist along Pass Avenue between Verdugo Avenue and SR 134. Of these three intersections, the Project has proposed traffic signal improvements at two locations: Pass Avenue & Verdugo Avenue (Intersection 75) and Pass Avenue & SR 134 westbound off-ramp (Intersection 78). The third intersection is the intersection of Pass Avenue & Oak Street (Intersection 76) and, as noted above, the Project does not result in a significant impact at the intersection of Pass Avenue & Oak Street under any of the analyzed scenarios. Therefore, the Project is not required to provide traffic signal improvements at this location.

A total of four signalized intersections exist along Verdugo Avenue between Hollywood Way and Buena Vista Street. Of these four intersections, detailed analysis was conducted at the two major intersections: Verdugo Avenue & Hollywood Way (Intersection 153) and Verdugo Avenue & Buena Vista Street (Intersection 156). As shown in Tables 31, 32, 39, and 40 in Section IV.B.1 of the Draft EIR and the analysis presented in Appendix F of the Transportation Study, the Project does not result in a significant impact at these intersections. Therefore, the Project is not required to provide traffic signal improvements at these locations. Additionally, since the Project does not result in an impact at the two major intersections along this corridor, the City of Burbank staff did not request the inclusion of the other two signalized intersections along this corridor as they are not expected to be impacted by the Project: Verdugo Avenue & California Street and Verdugo Avenue & Catalina Street.

While the Project does not result in a significant impact at the one intersection and two roadway corridors identified in the comment, in order to enhance the mitigation measures proposed for the other intersections, the Project shall modify the signal at Pass Avenue and Oak Street (Intersection 76) and provide signal interconnection for the following intersections in the Pass Avenue and Verdugo Avenue corridors: Pass Avenue and Olive Avenue (Intersection 81), Verdugo Avenue and Hollywood Way (Intersection 153), Verdugo Avenue and California Street, Verdugo Avenue and Catalina Street, and Verdugo Avenue and Buena Vista Street (Intersection 155). Additional mitigation measures have been included in the Final EIR. (See Corrections and Additions Nos. IV.B.1.C, IV.B.1.D, and IV.B.1.F, Section II of this Final EIR.) Mitigation Measures B-27, B-29, B-30, and B-31 in the Draft EIR already provide for additional signal equipment at the other intersections (Intersections 75, 78, 79, and 80) within the Pass Avenue corridor.

Comment No. 26-16

The City has also identified a need to provide better inter-jurisdictional traffic signal coordination along the Barham/Olive corridor between the City of Burbank and the City of

Los Angeles. This corridor includes a number of impacted intersections. Enhanced inter-jurisdictional coordination is required to realize the capacity credits applied to intersections in this heavily-travelled corridor.

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

- Cost $500K

Response to Comment No. 26-16

While the Draft EIR includes mitigation measures to mitigate Project impacts along the Barham Boulevard corridor at the City of Burbank and City of Los Angeles borders, the Applicant shall contribute up to $500,000 for Intelligent Transportation Systems equipment for interconnection between the two cities along this corridor as requested by the commenter. An additional mitigation measure has been included in the Final EIR (see Corrections and Additions No. IV.B.1.H, Section II, of this Final EIR).

Comment No. 26-17

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

Timing Plan Study: Lump sum of approximately $150K.

- Cost $150K

Adaptive Traffic Control System

- Software Upgrade for $200K
- Hardware (Vehicle detection system placement) for $500K
- Hardware (Controller Upgrade) for $100K
- Cost $800K

Response to Comment No. 26-17

The Applicant shall contribute up to $950,000 for the Timing Plan Study and Adaptive Traffic Control System software and hardware as requested in the comment. An

additional mitigation measure has been included in the Final EIR. (See Corrections and Additions No. IV.B.1.G, Section II of the Final EIR).

Comment No. 26-18

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

Response to Comment No. 26-18

See Response to Comment Nos. 26-13, 26-14, 26-15, and 26-16, above, for responses to specific comments regarding the mitigation measures. The comment regarding the cost estimate is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-19

6. Physical Improvements

The study has identified a number of physical improvements to mitigate project impacts in Burbank. These improvements include roadway intersection restriping, widening, parking removal, and sidewalk narrowing to add roadway capacity in the project area. These improvements have been proposed in response to both the primary, project-wide traffic analysis as well as the secondary, Burbank-specific supplemental analysis that was requested by the City. In some cases these physical improvements are accepted in concept, but the implementation of the improvements is not within acceptable engineering standards (e.g. narrow lanes, reduced-width sidewalks). In other cases, the improvements would reduce on-street parking or restrict turning movements. In some cases these improvements cannot be supported by the City given the Burbank City Council's policy direction with regard to street widening and parking removal. Detailed comments on each proposed physical improvement are described below.

Response to Comment No. 26-19

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Responses to comments regarding specific physical improvements are provided below.

Comment No. 26-20

Evergreen at Riverside (Intersection #77, B-28): The study identifies that that [sic] the applicant or its successor should widen the south side of Riverside immediately west of the intersection to provide dual Right Turn Lanes. The City requests that this improvement be implemented in consultation with City staff to ensure that the improvement is built to acceptable City standards.

Response to Comment No. 26-20

As set forth on page 207 in Chapter V of the Transportation Study (see Appendix E-1 of the Draft EIR), all transportation improvement measures would be implemented per the leading jurisdictions' requirements:

> "Widening and/or other improvements to the intersections would be designed to meet the requirements of LADOT, City of Los Angeles Bureau of Engineering, LACDPW, Caltrans, and/or City of Burbank Planning Department, based on the jurisdiction responsible for the intersection."

Comment No. 26-21

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

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

Response to Comment No. 26-21

The revisions requested in this comment have been incorporated as a correction and addition to the Draft EIR (see Correction and Addition No. Appendix E-1.C, Section II, of the Final EIR). In the event that the City of Burbank determines that the proposed mitigation measure is not feasible, the Applicant will continue to work with the City of Burbank to identify an alternative feasible improvement that mitigates the impact to a comparable level. Further, as stated on page 660 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, if a proposed traffic mitigation measures in another jurisdiction, such as the City of Burbank, is determined to be infeasible or necessary permits/approvals to implement the mitigation measure cannot be obtained, then a significant impact (or impacts) may remain.

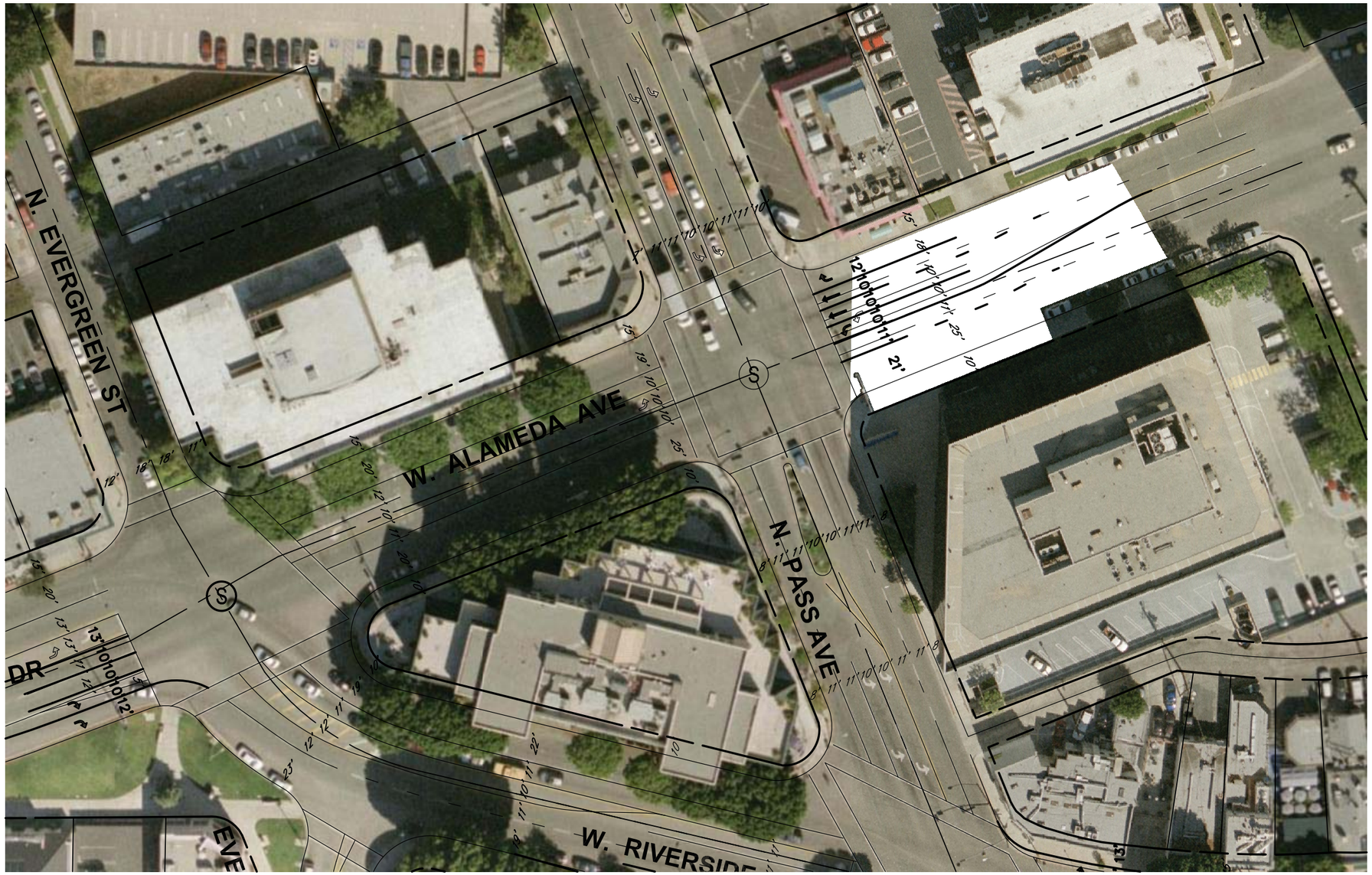
Comment No. 26-22

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

Response to Comment No. 26-22

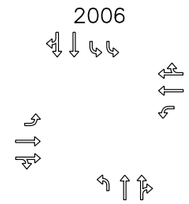
As shown in Appendix F of the Transportation Study (see Appendix E-1 of the Draft EIR), the Project's impact at this intersection under the City of Burbank guidelines is mitigated to a less than significant level by the Citywide Signal Control System signal improvement alone. However, under the Los Angeles Department of Transportation guidelines, the proposed physical improvement is required to mitigate the Project's impact at this location to less than significant.

The proposed physical improvement measure referenced in the comment was initially developed in conjunction with the City of Burbank staff. However, if the City of Burbank does not approve the proposed improvement, the Project's impact at this location under the City of Burbank guidelines would still be mitigated with implementation of the Citywide Signal Control System signal improvement and would be less than significant, as noted above. The Applicant will work with the City of Burbank to develop an alternate

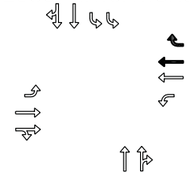


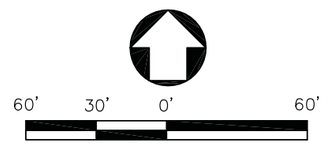
INTERSECTION #79
N/S: PASS AVE
E/W: ALAMEDA AVE

2006



2030 MITIGATIONS





L E G E N D :

: EXIST. R/W	PROP. R/W:
: EXIST. STRIPING	PROP. STRIPING:
: EXIST. CURB	PROP. CURB:
: EXIST. TRAFFIC FLOW DIRECTION	PROP. TRAFFIC FLOW DIRECTION:
12' 12' 11' : EXIST. LANE DIMENSIONS	PROP. LANE DIMENSIONS: 12' 22' 11'

Source: PSOMAS, May 12, 2011.

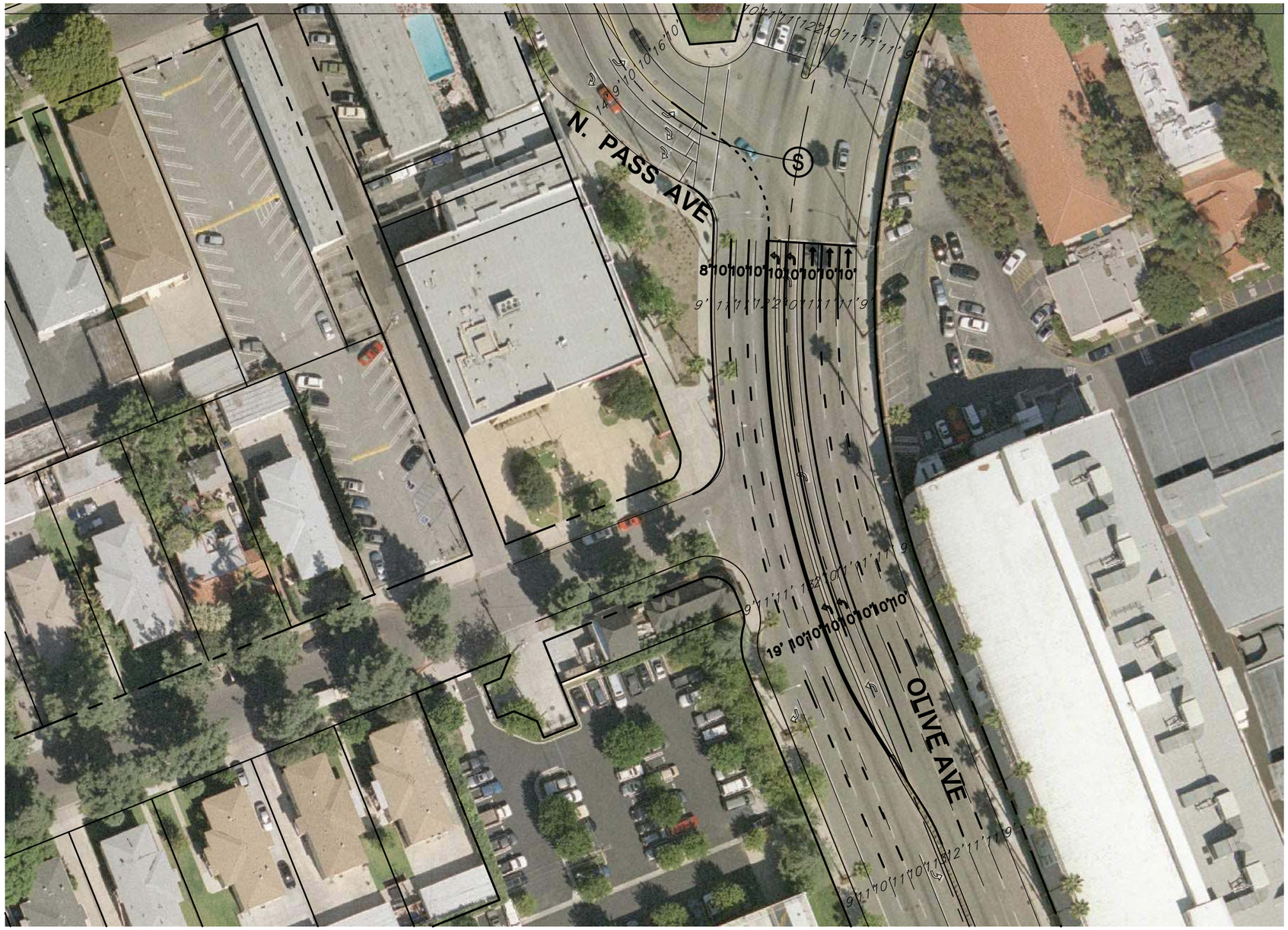
improvement to also mitigate the Project's impact under Los Angeles Department of Transportation guidelines to less than significant.

Comment No. 26-23

Pass at Olive (Intersection #81, B-32): The study identifies that the applicant or its successor widen Olive Avenue to provide dual left turn lanes northbound, three through lanes in each direction, and modify the traffic signal to accommodate this change. This improvement is on the City's long-range transportation plans and is identified as a mitigation measure for another development project in the City of Burbank. However, the study proposes a total of eight 10-foot lanes, including curb lanes, in this stretch of Olive Avenue with a horizontal curve with high rate of speed and reduced sidewalk width. This concept is not acceptable as it introduces hazardous roadway geometry. A similar improvement to the one that is recommended as a project mitigation is identified on the City's long-range plans as a mitigation for a previously-entitled development project, but the City's improvement assumes that additional right-of-way is required from adjacent properties to provide acceptable, safe lane and sidewalk widths. The City requests that the project consultant staff work with City staff to identify an improvement design that would accommodate acceptable lane and sidewalk widths and identify the required right-of-way needed for the improvement.

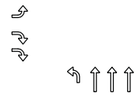
Response to Comment No. 26-23

The proposed physical improvement measure is required to mitigate the Project's impact under both the Los Angeles Department of Transportation guidelines and the City of Burbank guidelines. The previously entitled development project noted in the comment is the Warner Brothers Studios Specific Plan (identified as Related Project No. 15 in Table 10 of the Transportation Study). Additionally, the required right-of-way noted in the comment was proposed by Warner Bros. along the Warner Brothers Studios' frontage. When the required right-of-way becomes available to the City of Burbank by the Warner Brothers Studios Specific Plan project, the Applicant shall contribute its fair share to implement the proposed improvement. Alternatively, the Applicant proposes to implement the intersection improvement, as specified in Figure 8 on page 1549 if such right-of-way does not become available. It should be noted that such instances have been acknowledged and disclosed in Section VI, Summary of Significant and Unavoidable Impacts, of the Draft EIR.

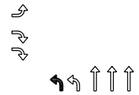


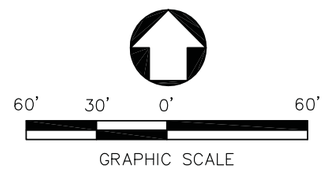
INTERSECTION #81
N/S: PASS AVE
E/W: OLIVE AVE

2006



2030 MITIGATIONS





LEGEND:

: EXIST. R/W	PROP. R/W:
: EXIST. STRIPING	PROP. STRIPING:
: EXIST. CURB	PROP. CURB:
: EXIST. TRAFFIC FLOW DIRECTION	PROP. TRAFFIC FLOW DIRECTION:
12' 12' 11' : EXIST. LANE DIMENSIONS	PROP. LANE DIMENSIONS: 12' 22' 11'

Source: PSOMAS, 2008.

matrix environmental

Figure 8
Intersection #81
Pass Avenue and Olive Avenue

Comment No. 26-24

Olive and Warner Brothers Studio Gate 2/Gate 3 (Intersection #83, B-33). The study does not address the existing on-going conflicts due to the steady flow of vehicles on Olive Avenue blocking the crosswalk on the south side. The City requests the project consulting staff work with the City staff to identify an improvement to this conflict and, if no acceptable improvement is identified, to consider reductions in the project size to mitigate this impact, or to identify this intersection as an unmitigated project impact.

Response to Comment No. 26-24

The comment incorrectly identifies the Olive and Warner Brothers Studios Gate 2/ Gate 3 as Intersection 83. This intersection is identified in the Transportation Study and Draft EIR as Intersection 82. As shown in Appendix F of the Transportation Study (see Appendix E-1 of the Draft EIR), the Project does not result in a significant impact at this location under the City of Burbank guidelines and methodology. As noted on pages 690–691 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, given physical constraints that limit intersection improvements, under Los Angeles Department of Transportation guidelines, a significant and unavoidable impact would remain at this intersection.

Comment No. 26-25

Olive and Warner Brothers Studio Gate 1/Lakeside (Intersection #83, B-34): The study identifies a need to restripe the eastbound direction to provide an exclusive eastbound Right Turn Lane and shared through and Left Turn lane in that direction. This improvement can be constructed in existing street-widths with minimal effects to on-street parking.

Response to Comment No. 26-25

The comment appears to acknowledge that the proposed mitigation measure is feasible. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-26

Alameda at 134 W/B on-ramp (Intersection #164, B-38): The study identifies a need to install a traffic signal at the 134 W/B on-ramp west of Hollywood Way and interconnect it with the existing traffic signal at intersection of Alameda and Hollywood Way. However, the level of service analysis for this intersection and the proposed improvement do not consider changes in roadway configuration due to the new westbound 134 on-ramp at Hollywood Way that is under construction and expected to open in April 2011. The City requests that

the study be revised to account for the pending ramp improvement and intersection geometry at this location. The City can provide the planned intersection configuration to the project applicant.

Alameda at Hollywood Way (Intersection #84): Level of service analysis for this intersection does not consider changes in roadway configuration due to the new westbound 134 on-ramp at Hollywood Way that is under construction and expected to open in April 2011. The City requests that the study be revised to account for the pending ramp improvement and intersection geometry at this location. The City can provide the planned intersection configuration to the project applicant.

Response to Comment No. 26-26

The Level of Service analysis at the intersections of Hollywood Way & Alameda Avenue (Intersection 84), Cordova Street/SR 134 westbound off-ramp & Alameda Avenue (Intersection 85), and SR 134 westbound on-ramp & Alameda Avenue (Intersection 164) have been revised based on the updated lane configurations provided by the commenter. The revised tables and worksheets in support of these analyses are provided as Appendix FEIR-3 to the Final EIR.

Based on the information presented therein, the updated lane configurations do not change the conclusions presented in the Draft EIR; i.e., the Project is not expected to result in significant and unavoidable impacts at these intersections.

It should also be noted that since the eastbound left-turn movement at the intersection of SR 134 westbound off-ramp & Alameda Avenue (Intersection 164) would be restricted per the updated lane configuration, the Project Applicant or its successors would no longer be required to install a traffic signal at this location. This change is consistent with the direction received from City of Burbank staff.

Comment No. 26-27

7. Neighborhood Intrusion Impacts

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

In addition, the study identifies significant project traffic travelling through the Pass Avenue corridor between Olive Avenue and Verdugo Avenue, which implies that significant project traffic is being directed into residential neighborhoods north of Verdugo Avenue.

Therefore, the project may significantly impact local residential neighborhoods north of Verdugo Avenue between Hollywood Way and Clybourn Avenue. Given the unpredictability of forecasting neighborhood traffic impacts prior to implementation of the project (per DEIR Appendix E – Transportation Study, page 368) and the City's skepticism that the aggressive TDM reductions will be realized, the City requests that the project provide a mechanism to fund a neighborhood protection program in the following neighborhoods:

a. The area bounded by Olive Avenue, Lakeside Drive the western city limits, and Riverside Drive

b. The area bounded by Olive Avenue, Pass Avenue, Riverside Drive, and Hollywood Way

c. The area bounded by Verdugo Avenue, Clybourn Avenue, Clark Avenue, and Hollywood Way

Response to Comment No. 26-27

With respect to the area bounded by Olive Avenue, Lakeside Drive, the western city limits, and Riverside Drive, as noted in Figure 73B in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, which is superseded by Figure 73B (Revised) (see Correction and Addition No. IV.B.1.K, Section II of this Final EIR), the Project's impact at this neighborhood is mitigated to a less than significant level under the Future with Project with Funded Improvements scenario. Therefore, the Project is not required to implement a neighborhood protection program for the identified neighborhood.

With respect to the area bounded by Olive Avenue, Pass Avenue, Riverside Drive, and Hollywood Way, as noted in Figure 73B in Section IV.B.1, Traffic/Access – Traffic/ Circulation, of the Draft EIR which is superseded by Figure 73B (Revised) (see Correction and Addition No. IV.B.1.K, Section II of this Final EIR) (and in Figures 67 and 68 in Chapter 8 of the Transportation Study, attached as Appendix E-1 to the Draft EIR), the Project's impact at this neighborhood is mitigated to a less than significant level under the Future with Project with TDM Program and Future with Project with Funded Improvements scenarios. Therefore, the Project is not required to implement a neighborhood protection program for the identified neighborhood.

With respect to the area bounded by Verdugo Avenue, Clybourn Avenue, Clark Avenue, and Hollywood Way, as shown in Figure 73A in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR and Figure 73B (Revised) (and in Figures 66, 67, and 68 in Chapter 8 of the Transportation Study, the Project adds fewer than 1,200 daily trips to Pass Avenue corridor between Olive Avenue and Verdugo Avenue. Therefore, the Project

does not meet the Los Angeles Department of Transportation threshold of a significant neighborhood impact as described on page 616 of the Draft EIR.

A review of Pass Avenue north of Verdugo Avenue was also conducted per the City of Burbank policy (*Transportation Study Policy and Procedures* [City of Burbank, January 1997, revised May 2001]). An estimate of average daily traffic along this corridor was developed using the afternoon peak-hour traffic volumes which typically represent 10 percent of the average daily traffic volumes. Based on traffic volumes shown in Figure 83D in Section IV.B.1 of the Draft EIR (Figure 55 of the Transportation Study, Appendix E-1 of the Draft EIR) for the intersection of Pass Avenue & Verdugo Avenue (Intersection 75), it is estimated that the total average daily traffic on Pass Avenue north of Verdugo Avenue would be 11,770, which includes approximately 590 Project trips (projections developed by applying a factor of 10 to the afternoon peak-hour traffic volumes). Therefore, the Project trips represent an increase of approximately 5 percent in the average daily traffic volumes on Pass Avenue. This level of increase does not meet the City of Burbank's threshold of significance (an 8 percent or more increase in average daily traffic for streets with 3,000 or more average daily traffic). Hence the Project is not expected to result in a significant impact on the identified neighborhood.

Comment No. 26-28

8. Consideration of Previously-Entitled Development Projects and Mitigations

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

Response to Comment No. 26-28

Provided below are a series of tables that present the requested comparison between Future Conditions without Burbank Long-Term Improvements and Future Conditions with Burbank Long-Term Improvements as presented in Appendix F of the

Transportation Study (attached as Appendix E-1 to the Draft EIR) and as amended pursuant to Response to Comment No. 26-26, above.

As noted by the commenter and mentioned in Appendix F of the Transportation Study (see Appendix E-1 of the Draft EIR), the two analyses were different in that the future base intersection lane configurations under the "Without Burbank Long-Term Improvements" analysis do not include those improvements proposed by the City of Burbank and/or other parties in Burbank since these improvements either do not have firm funding or may not be implemented. The lane configurations under the "With Burbank Long-Term Improvements" analysis do include those improvements proposed by the City of Burbank and/or other parties. Lane configurations at the intersections for both sets of analyses are provided in Figure F-2 of Appendix F in the Transportation Study (see Appendix E-1). The tables below provide a comparison of the number of impacted intersections under the two scenarios.

A. City of Burbank Intersections
Future with Project Conditions Impact Summary

	Without Burbank Long-Term Improvements	With Burbank Long-Term Improvements
A.M. Peak Hour	4	3
P.M. Peak Hour	10	7
Total Individual Impacted Intersections	11	8

B. City of Burbank Intersections
Future with Project with TDM Conditions Impact Summary

	Without Burbank Long-Term Improvements	With Burbank Long-Term Improvements
A.M. Peak Hour	3	2
P.M. Peak Hour	5	4
Total Individual Impacted Intersections	6	5

C. City of Burbank Intersections
Future with Project with TDM and Funded Improvements Conditions Impact Summary

	Without Burbank Long-Term Improvements	With Burbank Long-Term Improvements
A.M. Peak Hour	0	0
P.M. Peak Hour	0	0
Total Individual Impacted Intersections	0	0

As shown above, if the Long-Term Burbank Improvements are not implemented, the Project would result in a significant impact at 11 intersections before TDM and mitigation measures (funded improvements) (Table A). As the Project TDM is implemented, the number of significantly impacted intersections would decrease to 6 intersections (Table B). Without the Long-Term Burbank Improvements, under the Future with Project with TDM program and mitigation measures scenario, all intersections would be mitigated to a less than significant level (Table C).

A similar pattern is projected if the Long-Term Burbank Improvements are realized. With the Long-Term Burbank Improvements, the Project would result in a significant impact at 8 intersections before TDM and mitigation measures (Table A). As the Project TDM program is implemented, the number of significantly impacted intersections would decrease to 5 intersections (Table B). With the Long-Term Burbank Improvements, under the Future with Project with TDM and Mitigations scenario, there would be no remaining significantly impacted intersections (Table C).

The comment also requests information on the sequencing of Project mitigations with previously planned long-range improvements. The Project's mitigation program for the City of Burbank intersections includes only one mitigation measure that is shared by another development project: the improvement measure proposed for the intersection of Pass Avenue & Olive Avenue (Intersection 81). The proposed physical improvement measure is required to mitigate the Project's impact under both the Los Angeles Department of Transportation guidelines and the City of Burbank guidelines. As noted in Response to Comment No. 26-23, above, the development project that shares the improvement measure proposed for the intersection of Pass Avenue & Olive Avenue is the Warner Brothers Studios Specific Plan (identified as Related Project No. 15 in Table 6 on page 378 of the Draft EIR). With regard to the mitigation proposed for this intersection, see Response to Comment No. 26-23, above.

Comment No. 26-29

It also does not clearly describe how the project may need to mitigate intersection impacts if improvements are required that are shared by both the proposed project and previously-entitled projects in Burbank. For impact mitigations that might be shared with other development projects, the DEIR should provide an alternative to provide a fair-share cost of the improvements or to coordinate with other development projects that share the improvement.

Response to Comment No. 26-29

As noted in Response to Comment No. 26-28, above, the Project's mitigation program for the City of Burbank intersections includes only one mitigation measure that is

shared by another development project: the improvement measure proposed for the intersection of Pass Avenue & Olive Avenue (Intersection 81). With regard to an alternative to provide a fair share cost for this improvement, please see Response to Comment Nos. 26-23 and 26-28, above.

Comment No. 26-30

9. Transit Improvements

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

The City believes that this shuttle system needs to be a traditional, fixed-route service both within the project site as well as along the corridors that serve Burbank and Hollywood. An on-call, demand-responsive system would not be effective in shifting the project's employees, visitors, and others to transit because the on-call system requires too much advance planning and transfer times to make this system effective. The City believes that the shuttle service should provide 15-minute peak period and 30-minute off-peak service on a fixed route with local stops within and outside the project site, and with a published, fixed schedule.

Response to Comment No. 26-30

As noted in Mitigation Measure B-2 in Section IV.B.1.5, Traffic/Access – Traffic/ Circulation, of the Draft EIR, the shuttle service would provide 15-minute headways during the peak periods and 30-minute headways during the off-peak periods on fixed routes with local stops within and outside the Project Site, consistent with the commenter's suggestion. The "bus call ability" facility (on-call demand-responsive system) will be available only during late night hours (12:00 A.M. to 5:00 A.M.) when there are fewer patrons.

Comment No. 26-31

Further, this system should be branded as a service included in one of the existing transit system (such as Metro, LADOT, or BurbankBus) rather than a standalone, Universal-branded shuttle with little recognition to infrequent or new transit riders. Branding the service as part of the larger region will help increase its awareness as another transit resource amongst existing bus, rail and commuter rail systems.

Response to Comment No. 26-31

It is currently anticipated that the shuttle system would be operated and maintained by the Applicant. However, the Applicant could contract with a private entity or an existing transit system to operate the shuttle. Regardless, as noted in City of Los Angeles Department of Transportation's Assessment Letter dated April 2, 2010 (see Appendix E-2 of the Draft EIR), the Applicant would work with Metro, the Los Angeles Department of Transportation, and the City of Burbank staff to ensure that the proposed shuttle routes meet the demands and needs of employees and residents at the time of deployment of the shuttle system:

> "The applicant shall work with DOT, Metro and neighboring cities when developing the final shuttle routes and stop locations prior to implementation of the shuttle program. Also, to maximize the benefits of the shuttle program, the routes, stops, headways and hours of operation should be revisited periodically after deployment of the shuttle program to determine if the program can be improved consistent with the financial commitment guaranteed by the Applicant for a minimum of 20 years."

Comment No. 26-32

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

Response to Comment No. 26-32

As explained in Response to Comment No. 26-31, above, the Applicant will work with Metro, the Los Angeles Department of Transportation, and the City of Burbank staff to ensure that the proposed shuttle routes meet the demands and needs of employees and residents at the time of deployment of the shuttle system.

Comment No. 26-33

The City believes that justification of an aggressive TDM credit needs to include provisions for connecting the project site to the Bob Hope Airport, the Metrolink/Amtrak Ventura Line, and the large media employment center in the Golden State area of Burbank east of the

airport. The transit mitigation package should included [sic] enhanced transit connectivity to the Bob Hope Airport area through expanded service on the existing Metro Local 222 route along Hollywood Way similar in scope to the transit connections proposed in the study. In addition, the transit mitigations should include a requirement for the project to participate in any future transit studies of the Bob Hope Airport area and should include provisions for connecting to the proposed California High Speed Rail station at its San Fernando Valley station.

Response to Comment No. 26-33

The proposed local shuttle system routes included in the Project's transit mitigation program were developed based on the locations of intersections impacted by the Project. Future transit studies of the Bob Hope Airport are beyond the scope of the Project and should be conducted by regional transit providers. Additionally, the location of the proposed California High Speed Rail Station in the San Fernando Valley is speculative at this time and therefore it is infeasible for the Applicant to commit to connections to the proposed station.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Refer also to Topical Response No. 5: Transit Mitigation(see Section III.C, Topical Responses, of this Final EIR), for additional details.

Comment No. 26-34

Finally, the City believes that proposed roadway improvements should complement the proposed transit improvements to improve transit travel times relative to auto travel and encourage shifts to transit. Consideration should be given to implementing the proposed third through lane on Barham Boulevard as a transit-only lane (similar to the Wilshire Boulevard bus lanes) rather than a mixed-flow lane. Given the tremendous latent demand for vehicle travel in the Barham corridor, a new mixed-flow lane will do nothing to improve travel times for vehicles, but reserving it for transit vehicles could provide a [sic] improvement to bus travel times and make transit trips in the corridor more attractive.

Response to Comment No. 26-34

The proposed third southbound through lane on Barham Boulevard, described in Mitigation Measure B-5 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, has been reviewed and approved by the Los Angeles Department of Transportation and mitigates the Project's impacts while alleviating traffic congestion along the corridor. The suggestion to designate this lane as a transit-only lane is noted and has been

incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-35

Consideration should also be taken to implement this odd-numbered fifth through lane as a reversible lane to accommodate directional AM and PM travel flows.

Response to Comment No. 26-35

The comment requests that the proposed third southbound through lane on Barham Boulevard, as described in Mitigation Measure B-5 in Section IV.B.1 of the Draft EIR, be implemented as a reversible lane. Field observations and a detailed review of traffic conditions along the Barham Boulevard corridor have shown that traffic congestion along this corridor is predominant in the southbound direction. The proposed third southbound through lane on Barham Boulevard has been reviewed and approved by the Los Angeles Department of Transportation and mitigates the Project's impacts while alleviating traffic congestion along the corridor. The suggestion to designate this lane as a reversible lane is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-36

In addition, implementation of the proposed interior "north-south spine road" should provide for transit infrastructure such as pre-emption, queue jumps, and other measure [sic] to improve transit flow in the project site.

Response to Comment No. 26-36

The projected traffic volumes along the North-South Road preclude the need for transit infrastructure along the North-South Road and, therefore, a separate transit infrastructure would not offer the transit vehicles any travel time savings.

Comment No. 26-37

10. Los Angeles River Bicycle Path

The City requests that the project participate in completion of the Los Angeles River bicycle path between Barham Boulevard and Lankershim Boulevard along the Los Angeles River. Identified in the Los Angeles River Master Plan, this is a critical link in a regionally significant Class I bicycle path and will integrate the proposed project in the region's bicycle facilities. The City of Burbank is pursing [sic] infrastructure to connect its Media District to the proposed LA River path, and integration of the path with the proposed project will help

to provided infrastructure that supports the study's claimed TDM and non-motorized transportation credits.

Response to Comment No. 26-37

With respect to the provision of a bicycle path along the Los Angeles River Flood Control Channel, as explained on pages 418–419 in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, the northeastern portion of the Project Site that abuts the Los Angeles River Flood Control Channel is within the jurisdiction of the City of Los Angeles. The remaining approximately three-fourths of the northern edge of the Project Site is adjacent to River Road, a two-lane roadway that runs along the Los Angeles River Flood Control Channel. The majority of this northern edge is within the jurisdiction of the County of Los Angeles and the majority of the River Road roadway is owned by the Los Angeles County Flood Control District. As stated in the Draft EIR, the Applicant would cooperate with the County, the City of Los Angeles, and other agencies, as necessary, to accommodate the future use of the County land for public use as contemplated by the County River Master Plan and to continue use, if allowed by the County, of a portion of River Road for studio access. In addition, the Project includes a pedestrian/bicycle connection through the Project Site to CityWalk, as contemplated by the County River Master Plan. Further, in the northeastern portion of the Project Site that is within the City of Los Angeles jurisdiction and owned by the Applicant, the Project proposes a River Trailhead Park that would provide access to the Los Angeles River Flood Control Channel, and connect the existing bike path along Forest Lawn Drive and the proposed bike path along the proposed North-South Road. If the County implements a public path on the County-owned portion of the Los Angeles River Flood Control Channel frontage, that path could be connected to the proposed River Trailhead Park and the internal bike path along the North-South Road. The proposed Project furthers the goals and objectives of the County River Master Plan and City of Los Angeles River Revitalization Master Plan and would not preclude the implementation of a bicycle path along the Los Angeles River Flood Control Channel as contemplated in those plans.

Comment No. 26-38

Public Services

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

Response to Comment No. 26-38

This comment introduces issues relating to public facilities and services provided by the City of Burbank. Specific comments are provided and responded to below.

Comment No. 26-39

There are library and park facilities located in the City of Burbank near the project site. In some cases these facilities may be more convenient and/or desirable for project tenants than comparable facilities in the City or County of Los Angeles. To use a specific example, the City of Burbank's Buena Vista Branch Library, located at 300 North Buena Vista Street, is the closest library to the project site of any jurisdiction, and probably the most convenient to access. Further, the Buena Vista Branch Library is larger than the two closest City of the Los Angeles libraries that are cited in the DEIR (North Hollywood and Goldwyn), with 28,000 square feet and over 184,400 volumes. Since Burbank's facility is closer, more convenient, and offers greater selection than the Los Angeles City or County libraries discussed in the DEIR, it is possible that there may be greater impacts on Burbank's Buena Vista Branch Library than other libraries discussed in the DEIR. While the proposed mitigation measure to locate a branch library on the project site may mitigate some of this impact, the limited size and number volumes that will be found at that library will mean that many residents will still need to travel off-site for more complete library services.

The City of Burbank is a member of the Southern California Library Cooperative (SCLC) along with the City and County of Los Angeles.[42] Burbank also operates a universal borrowing program with the Los Angeles City and County libraries, so residents of those areas may receive free Burbank library cards and enjoy the same privileges as Burbank residents. The Burbank Public Library currently has about 73,000 library card holders, of which about 26,000 are residents of the City of Los Angeles. About 9,400 of those residents live in ZIP codes that are adjacent to the project site. The DEIR states that the residential component of the project is expected to add 6,450 residents to the area. As such, there is the potential for a notable increase in Burbank library card holders and service demands placed on the Buena Vista Branch Library and other Burbank libraries. This should be discussed and analyzed in the EIR.

[42] *On page 1813, the DEIR references the Metropolitan Cooperative Library System. The Southern California Library Cooperative has replaced that organization.*

Response to Comment No. 26-39

As the comment notes, the City of Burbank is a member of the Southern California Library Cooperative, as are the City and County. The Southern California Library Cooperative is an association of 46 independent city and special district public libraries located in Los Angeles, Orange, and Ventura counties which have agreed to cooperate in providing library service to the residents of all participating jurisdictions. The Southern California Library Cooperative provides member libraries a resource-sharing network and a means for enhancing the level and diversity of resources available to library users, while reducing the duplication of effort (see www.socallibraries.org.). Southern California Library Cooperative members extend, on an equal basis, loan privileges to residents of other member libraries. The Southern California Library Cooperative also includes a reference center and delivery service that link members for a quick transfer of materials and enhanced sharing of resources. Library cooperatives such as the Southern California Library Cooperative are governed under the California Library Services Act. (Ed. Code, §§ 18700–67.) The California Library Services Act is specifically designed to assist and encourage interlibrary cooperation. Each member library of a cooperative library system must provide equal access to all residents of the area served by the cooperative library system, where "equal access" is defined as "the right of the residents of jurisdictions that are members of a cooperative library system to use on an equal basis with one another the services and loan privileges of any and all other members of the same system." (Ed. Code, §§ 18743, 18710(e).) Pursuant to the City of Burbank "Library Policies," anyone who lives, works or goes to school in the City of Burbank or lives in the County of Los Angeles may be issued a Burbank library card free of charge (see www.burbank.lib.ca.us/library-policies.cfm). Both the City of Los Angeles Public Library and the County of Los Angeles Public Library offer free library cards to any resident of California (see www.lapl.org/about/borrower.html and www.colapublib.org/aboutus/librarycard.html).

Based on data provided by the City of Burbank's Planning and Transportation Division, subsequent to the submittal of Comment Letter No. 26, a total of 73,820 library cards, as shown in Table 4 on page 1563, have been issued by Burbank's Buena Vista Branch Library, 17,615 of which are issued to individuals within the Zip Codes near Universal City, but outside of Burbank's city limits.

The following methodology was used to assess the potential usage of Burbank's Buena Vista Branch Library by future Project residents.

- First, as shown in Table 1 on page 73, the population within the Zip Codes which correspond to the 17,615 library card holders was calculated based on 2010 U.S. Census data.

Table 4
Analysis of Potential Increase in Library Cards Issued by Burbank's Buena Vista Branch Library Due to Proposed Project Development

ZIP Code[a]	2010 Population[b]	Number of Buena Vista Library Card Holders[a]
91601	37,180	3,894
91602	17,473	3,082
91604	29,034	1,127
91605	56,343	1,124
91606	44,958	2,438
91607	27,927	1,217
90027	45,151	315
90028	28,714	243
90038	28,917	107
90046	48,581	375
90068	22,286	1,997
90069	20,483	80
91352	47,807	1,616
Total	**454,854**	**17,615**
Population per Buena Vista Branch Library card:		26
Proposed Project Population:		6,450
Forecasted Number of Library Cards Held by Project Residents:		248
Total Library Cards Issued by Buena Vista Branch Library:		73,820
Percent Increase in Buena Vista Library Cards with Proposed Project:		0.3%

[a] *List of ZIP Codes provided by the City of Burbank, Planning & Transportation Division, September 2011. The list of ZIP Codes provided by the City of Burbank also included the following ZIP Codes: 91603, 91608, 91609, and 91610. The 2010 census does not report residential populations for these four ZIP Codes. Since the purpose of this analysis is to determine the likelihood that proposed Project residents would utilize Burbank's Buena Vista Branch Library, the number of library cards originating from these ZIP Codes is not included in the analysis. This assumption would not have a material effect on the analysis as only a total of 82 library cards, or 0.4 percent of the total library cards issued for the ZIP Codes provided by the City of Burbank are issued for these four zip codes.*

[b] *Year 2010 U.S. Census data obtained via American Factfinder, accessed October 16, 2011.*

Source: Matrix Environmental, October 2011.

- Second, based on this data it was calculated that one library card has been issued by Burbank's Buena Vista Branch Library for every 26 people within the selected Zip Codes.

- Third, based on a forecasted total Project resident population of 6,450, a total of 248 library cards could potentially be issued to future Project residents by Burbank's Buena Vista Branch Library.

Based on the City of Burbank's data that a total of 73,820 library cards have been issued by Burbank's Buena Vista Branch Library, the addition of Project residents would increase the number of cardholders to the Burbank Buena Vista Brach Library by 0.30 percent. This percentage increase in service population would result in a less than significant impact to the service level provided by Burbank's Buena Vista Branch Library.

Further, pursuant to Mitigation Measure K.5-1, the Project would include a new on-site branch library within the Mixed-Use Residential Area to be operated by the City of Los Angeles Public Library to address the additional demand on library services resulting from the proposed Project. It is anticipated that Project residents would use the on-site branch library for library services given the convenience of the location on-site and its proximity to their homes. Should the City of Los Angeles Public Library opt not to open a branch library on the Project Site, pursuant to Mitigation Measure K.5-3, the Applicant would pay to the City of Los Angeles a mitigation fee of $400 per Project dwelling unit, which fee shall be used for the purpose of providing or enhancing the delivery of library services at another branch library in the vicinity of the Project. In the event the proposed annexation does not occur, the Applicant would pay mitigation fees to the City and County for each dwelling unit located within the City and County, respectively, to enhance the delivery of library services. (See Mitigation Measure K.5-4.) With the implementation of the mitigation measures described in Section IV.K.5, Public Services – Libraries, of the Draft EIR, impacts to City and County library facilities would be less than significant.

Comment No. 26-40

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

Response to Comment No. 26-40

As discussed in Section IV.K.2, Public Services – Police/Sheriff, of the Draft EIR, while the proposed Project is anticipated to affect vehicle/capacity ratios and the level of service of roadways in the Project vicinity, the implementation of a Transportation Demand Management program, regional and sub-regional transportation improvements, and Project-specific intersection improvements would help to reduce Project-related traffic impacts on area intersections and roadways. Based on performance criteria established by the City of Burbank, traffic conditions at all intersections in the City of Burbank are mitigated to less than significant levels, as discussed in Response to Comment No. 26-13. However, any increase in traffic would not greatly affect emergency vehicles since the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, emergency response times would not be substantially affected given that there is a significant traffic impact at limited locations and the availability of alternative routes given the street pattern in the area surrounding the Project Site. (See pages 1734–35 of the Draft EIR).

Further, to the extent that Project residents travel to Burbank for shopping or entertainment, they would comprise a very small increase in the total consumer population in the City of Burbank. Also, with respect to recreation, as discussed in Section IV.K-4, Parks and Recreation, of the Draft EIR, the Project includes project design features to provide park and recreation space on-site to meet the needs of Project residents. (See Project Design Feature K.4-1.) It is anticipated that Project residents would use the on-site recreational facilities for most of their recreational needs given the convenience of the parks and recreational facilities on-site and their proximity to the residents' homes.

Comment No. 26-41

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

Response to Comment No. 26-41

The closing comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 26-42

This letter is in response to your request for a written acknowledgement of our collaborative efforts to develop a revised travel demand model for the purposes of determining traffic

impacts in the City of Burbank related to the Universal Evolution Plan (formally the NBC Universal Vision Plan).

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

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

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

While we endorse the modified travel demand model as a tool for identifying impacts and developing mitigations for the Universal Evolution Plan, this letter does not endorse the project itself or any findings that will be derived from the use of this modified model as will be reported in the project's DEIR. Accurate results of the model depend upon the accuracy and appropriateness of model inputs. This letter does not endorse model inputs including but not limited to project trip generation and trip reductions. Further, this letter does not endorse future project traffic forecasts resulting from project trip generation, project traffic impacts, or any proposed traffic impact mitigations identified in the DEIR.

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

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

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

Response to Comment No. 26-42

This attachment consists of a copy of a letter dated December 21, 2009, from Mr. David Kriske, City of Burbank, to Mr. Pat Gibson, P.E., which provides input from the City of Burbank staff with regard to the travel demand model developed to analyze the Evolution Plan.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 27

Michael D. Forbes
Assistant Community Development Director/City Planner
City of Burbank
275 E. Olive Ave.
P.O. Box 6459
Burbank, CA 91510

[Note: Letter stamped Draft]

[Note: A duplicate of the letter provided below was received on 1/13/11]

Comment No. 27-1

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

Traffic and Transportation

1. Travel Demand Model / Growth Forecasts

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

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

By way of a letter transmitted to the project consulting team in December 2009 (attached hereto), City of Burbank staff acknowledged that the modified model methodology, study area, network and zone structure, background socio-economic data and forecasts, traffic counts, and other data had been developed in accordance with Burbank's policies for project traffic studies. It should be noted that the City has identified errors in the cumulative projects list included in the DEIR (DEIR Exhibit E - Transportation Study, Table 10: Trip Generation Estimates for Cumulative Projects, page 96) including a mischaracterization of the expected development of major studio campuses with large, un-built development entitlements. However, through the collaborative modeling process conducted for the Burbank-specific Alternative Impact Analysis, the City acknowledges that all cumulative projects reasonably foreseeable in the City of Burbank have been accounted for in the travel demand model land use assumptions, even if they are incorrectly listed in the Cumulative Projects table. The Cumulative Projects table should be corrected to accurately reflect the numbers used in the analysis.

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

2. Trip Generation / Transportation Demand Management Credits

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

In addition, a number of trip credits are taken from basic trip generation to account for factors like pass-by trips, internal capture trips, and non-motorized trips. The City believes that application of these credits on top of the already-low trip generation for the retail uses severely undercounts the trip generation. First, ITE provides an average pass-by trip

generation credit of 34 percent for shopping centers, while the traffic study applies a 40 to 50 percent credit. This is compounded with an additional credit for walking/cycling/internal capture trips that is inappropriate for the proposed uses, especially since the use of the shopping center rate (instead of explicit ITE rates for retail, restaurant, and other uses commonly found in a shopping center) already implies internal capture of trips due to the nature of a shopping center use. Because these large credits are compounded on top of an already-low trip generation rate (from the average rate instead of the fitted-curve rate), the City believes the trip generation is underestimated.

Finally, it is possible that on top of these credits an additional Transportation Demand Management (TDM) credit was taken on the community and neighborhood retail portions of the project, although this is not clear from the study (DEIR Appendix E – Transportation Study Table 19 – Proposed Project TDM Program, page 287).

The City also disagrees with the trip generation reduction claimed for the TDM program that is proposed to reduce the project's trip generation. In particular, the study is applying a 20 percent TDM reduction on 1,874 of the 2,937 new housing units proposed for the project. This is an extremely aggressive TDM reduction for housing units in Los Angeles, especially if the housing is targeting upper-income households, requires bus-to-rail transfers, and includes multiple free parking spaces for each housing unit. Other than the provision for free transit passes and a marginal proximity to the Metro Red Line (requiring either a long walk or a bus transfer), there is virtually no incentive for the residents of the housing units in the proposed project to shift to bus or rail. The City suggests that if an aggressive TDM reduction be proposed that it be coupled with equally-aggressive TDM measure such as parking pricing or unbundled free parking, reduced parking ratios (e.g. provide one space per unit), or direct proximity to the Metro Red Line Subway, Metro Rapid bus, or other high-capacity bus services. As proposed, the layout of the residential units in relation to transit amenities and the lack of any true disincentives to driving will not result in a 20 percent trip generation reduction on the housing portion of the project.

These comments also apply to the 25 percent TDM reduction on the office component, especially with regard to the large amounts of parking being provided to office workers. Like the residential, there is little incentive to utilize transit if abundant parking is being provided on site.

The project proposes a phased project implementation that conditions development of future phases based on completion of mitigation measures and monitoring of actual trip generation of prior phases. The City requests that traffic monitoring infrastructure be built into roadway improvements that serve the new project phases so that adequate, real-time sampling of traffic volumes of the project can be captured (e.g. [sic] installation of loop detectors in project access points and driveways to monitor actual trip generation of the

project). This monitoring equipment can be used to verify any trip generation assumptions included in the analysis.

3. City of Burbank Alternative Impact Analysis Methodology

The City of Burbank Alternative Impact Analysis (DEIR Appendix E – Transportation Study Appendix F: LOS Worksheets and Impact Analysis Other Jurisdictions) indicates that the City's Interim Traffic Study Guidelines (City of Burbank, November 2007) were used to conduct traffic impact analysis under the Alternative Impact Analysis. However, the Significant Impact Criteria described on page F-4 of the Transportation Study Appendix F does not match the criteria outlined in the City's Interim Traffic Study Guidelines. In general, the City's thresholds mirror those of the City of Los Angeles, except that the threshold for intersections at LOS F is more stringent than the City of Los Angeles. The City requests that the intersection impact analysis be reviewed to determine that it is consistent with the City of Burbank Interim Traffic Study Guidelines, or at a minimum conform to the City of Los Angeles significance thresholds (which are substantially similar to the City of Burbank).

4. Traffic Signal Improvements

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

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

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

    — Cost: $218K

- **Evergreen at Riverside (Intersection #77, B-28):** This intersection requires minor traffic signal modification for approximately $50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network requiring including [sic] the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.

  — Cost: $56K

- **Pass at 134 E/B off-ramp (Intersection #78, B-29):** This intersection requires minor traffic signal modification for approximately $50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network requiring 1200 feet of conduit and fiber optic cable at a cost of $25K and the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.

  — Cost: $81K

- **Pass at Alameda (Intersection #79, B-30):** This intersection requires minor traffic signal modification for approximately $50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.

  — Cost: $56K

- **Pass at Riverside (Intersection #80, B-31):** This intersection requires minor traffic signal modification for approximately $50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.

  — Cost: $56K

- **Pass at Olive (Intersection #81, B-32):** Modify the traffic signal at this intersection for approximately $100K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.

  — Cost: $106K

- **Olive and Warner Brothers Studio Gate 2/Gate3 (Intersection #83, B-33):** This intersection requires minor traffic signal modification for approximately

$50K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.

— Cost: $56K

- **Olive and Warner Brothers Studio Gate 1 / Lakeside (Intersection #83, B-34):** Fully modify the traffic signal at this intersection for approximately $250K. Connect this intersection to the City of Burbank's Traffic Management Center's (TMC) fiber optic network including the necessary fiber to Ethernet communication equipment including an ATC Traffic controller for a cost of $6K.

  — Cost: $256K

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

  — Cost: $6K

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

  — Cost: $256K.

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

  — Cost: $56K

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

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

  — Cost: $200K

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

  — Cost: $500K

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

  — Cost: $250K

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

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

  — Cost: $500K

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

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

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

5. Physical Improvements

The study has identified a number of physical improvements to mitigate project impacts in Burbank. These improvements include roadway intersection restriping, widening, parking removal, and sidewalk narrowing to add roadway capacity in the project area. These improvements have been proposed in response to both the primary, project-wide traffic analysis as well as the secondary, Burbank-specific supplemental analysis that was requested by the City. In some cases these physical improvements are accepted in concept, but the implementation of the improvements is not within acceptable engineering standards (e.g. narrow lanes, reduced-width sidewalks). In other cases, the improvements would reduce on-street parking or restrict turning movements. In some cases these improvements cannot be supported by the City given the Burbank City Council's policy direction with regard to street widening and parking removal. Detailed comments on each proposed physical improvement are described below.

- **Evergreen at Riverside (Intersection #77, B-28):** The study identifies that that [sic] the applicant or its successor should widen the south side of Riverside immediately west of the intersection to provide dual Right Turn Lanes. Widening streets and removing on-street parking in order to increase intersection capacity at this location would not be supported by the City due to policy direction about parking removal and roadway widening. This improvement is also not currently identified by the City as a necessary long-range transportation improvement. The City requests that the project consulting staff work with City staff to identify an alternative physical improvement and, if no acceptable improvement is identified, to identify this intersection as an unmitigatable project impact.

- **Pass at Alameda (Intersection #79, B-30):** The study identifies that that [sic] the applicant or its successor should widen the north side of Alameda immediately east of intersection [sic] to allow an exclusive west bound 10-foot right turn lane even though the minimum acceptable curb-lane width is 12 feet. Removing on-street parking in order to increase intersection capacity at this location would not be supported by the City due to policy direction regarding parking removal on City streets.

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

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

- **Pass at Olive (Intersection #81, B-32):** The study identifies that the applicant or its successor widen Olive Avenue to provide dual left turn lanes northbound, three through lanes in each direction, and modify the traffic signal to accommodate this change. This improvement is on the City's long-range transportation plans and is identified as a mitigation measure for another development project in the City of Burbank. However, the study proposes a total of eight 10-foot lanes, including curb lanes, in this stretch of Olive Avenue with a horizontal curve with high rate of speed and reduced sidewalk width. This

concept this [sic] is not acceptable as it introduces hazardous roadway geometry. The improvement as identified on the City's long-range plans assumes that additional right-of-way is required to construct this improvement from adjacent properties to maintain acceptable, safe lane and sidewalk widths. The City requests that the project consultant staff work with City staff to identify an improvement design that would accommodate acceptable lane and sidewalk widths and identify the required right-of-way needed for the improvement.

- **Olive and Warner Brothers Studio Gate 2/Gate 3 (Intersection #83, B-33):** The study does not address the existing on-going conflicts due to the steady flow of vehicles on Olive Avenue blocking the crosswalk on the south side. The City requests the project consulting staff work with the City staff to identify an improvement to this conflict and, if no acceptable improvement is identified, to identify this intersection as an unmitigatable project impact.

- **Olive and Warner Brothers Studio Gate 1/Lakeside (Intersection #83, B-34):** The study identifies a need to restripe the eastbound direction to provide an exclusive eastbound Right Turn Lane and shared through and Left Turn lane in that direction. This improvement can be constructed in existing street-widths with minimal effects to on-street parking.

- **Alameda at 134 W/B on-ramp (Intersection #164, B-38):** The study identifies a need to install a traffic signal at the 134 W/B on-ramp west of Hollywood Way and interconnect it with the existing traffic signal at intersection of Alameda and Hollywood Way. However, the level of service analysis for this intersection and the proposed improvement do not consider changes in roadway configuration due to the new westbound 134 on-ramp at Hollywood Way that is under construction and expected to open in April 2011. The City requests that the study be revised to account for the pending ramp improvement and intersection geometry at this location. The City can provide the planned intersection configuration to the project applicant.

6. Consideration of Previously-Entitled Development Projects and Mitigations

The Burbank Alternative Impact Analysis includes project traffic impact analysis under two future roadway scenarios. In the first scenario, only future funded roadway improvements are considered to be in place by the project horizon year. In the second scenario, the City's long-range transportation improvements are also assumed to be constructed by 2030. These improvements include intersection and signal projects that are identified in the City's long-range infrastructure blueprint as well as improvements identified as mitigations for entitled developments for the three major studio campuses in the Media District. While these two alternative analyses are included to show traffic impacts under

both scenarios, the DEIR does not describe how differences in the impacts under both of these scenarios affect the sequencing or coordination of project mitigations with previously-planned long-range improvements.

It also does not clearly describe how the project may need to mitigate intersection impacts if improvements are required that are shared by both the proposed project and previously-entitled projects in Burbank.

7. Transit Improvements

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

The City believes that this shuttle system needs to be a traditional, fixed-route service both within the project site as well as along the corridors that serve Burbank and Hollywood. An on-call, demand-responsive system would not be effective in shifting the project's employees, visitors, and others to transit because the on-call system requires too much advance planning and transfer times to make this system effective. The City believes that the shuttle service should provide 15-minute peak period and 30-minute off-peak service on a fixed route with local stops within and outside the project site, and with a published, fixed schedule.

Further, this system should be branded as a service included in one of the existing transit systems (such as Metro, LADOT, or BurbankBus) rather than a standalone, Universal-branded shuttle with little recognition to infrequent or new transit riders. Branding the service as part of the larger region will help increase its awareness as another transit resource amongst existing bus, rail and commuter rail systems.

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

route could provide a transit alternative to the congested Barham corridor while still connecting the residential portion of the project to two major trip destinations.

Finally, the City believes that proposed roadway improvements should complement the proposed transit improvements to improve transit travel times relative to auto travel and encourage shifts to transit. Consideration should be given to implementing the proposed third through lane on Barham Boulevard as a transit-only lane (similar to the Wilshire Boulevard bus lanes) rather than a mixed-flow lane. Given the tremendous latent demand for vehicle travel in the Barham corridor, a new mixed-flow lane will do nothing to improve travel times for vehicles, but reserving it for transit vehicles could provide a [sic] improvement to bus travel times and make transit trips in the corridor more attractive.

Consideration should also be taken to implement this odd-numbered fifth through lane as a reversible lane to accommodate directional AM and PM travel flows.

In addition, implementation of the proposed interior "east-west spine road" should provide for transit infrastructure such as pre-emption, queue jumps, and other measure [sic] to improve transit flow in the project site.

Public Services

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

There are library and park facilities located in the City of Burbank near the project site. In some cases these facilities may be more convenient and/or desirable for project tenants than comparable facilities in the City or County of Los Angeles. To use a specific example, the City of Burbank's Buena Vista Branch Library, located at 300 North Buena Vista Street, is the closet library to the project site of any jurisdiction, and probably the most convenient to access. Further, the Buena Vista Branch Library is larger than the two closest City of the Los Angeles libraries that are cited in the DEIR (North Hollywood and Goldwyn), with 28,000 square feet and over 184,400 volumes. Since Burbank's facility is closer, more convenient, and offers greater selection than the Los Angeles City or County libraries discussed in the DEIR, it is possible that there may be greater impacts on Burbank's Buena Vista Branch Library than other libraries discussed in the DEIR. While the proposed mitigation measure to locate a branch library on the project site may mitigate some of this impact, the limited size and number volumes that will be found at the library will mean that many residents will still need to travel off-site for more complete library services.

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

[1] *On page 1813, the DEIR references the Metropolitan Cooperatives Library System. The SCLC has replaced that organization.*

Similarly, the DEIR focuses its discussion of police impacts on the Los Angeles Police Department and Los Angeles County Sheriff's Department, and primarily focuses on on-site crime and policing issues. However, the proposed project would result in a substantial number of additional vehicles using streets in the City of Burbank. Many of these drivers will stop to shop or conduct business on their way through Burbank. The additional traffic and people will lead to increased demand for police services in Burbank as a result of increased traffic infractions, accidents, and criminal activity. This will impact the Burbank Police Department and may affect its ability to continue providing the same levels of service to the Burbank community. The EIR should discuss the potential impacts on the services of all affected police departments and not just the Los Angeles Police Department and Los Angeles County Sheriff's Department.

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

Response to Comment No. 27-1

Comment Letter No. 27 is a draft letter authored by the City of Burbank staff that was superseded by the final comment letter submitted by the City of Burbank, which is included as Comment Letter No. 26 to this Final EIR. The draft letter is substantially the same as the final letter. Please refer to Comment Letter No. 26 and responses thereto in this Final EIR for responses to the final comment letter submitted by the City of Burbank.

Comment Letter No. 28

Michael D. Forbes
Assistant Community Development Director/City Planner
City of Burbank
275 E. Olive Ave.
P.O. Box 6459
Burbank, CA 91510
www.ci.burbank.ca.us

[Note: An email cover and two duplicates of the letter provided below were received on 11/17/10]

Comment No. 28-1

Attached please find a letter from the City of Burbank requesting an extension of the comment period for the Draft EIR for the NBC Universal Evolution Plan. If you have any questions or concerns, please contact me via email or at 818-238-5250. Thank you for your consideration of this request.

The City of Burbank respectfully requests that the City of Los Angeles consider extending the comment period for the Draft Environmental Impact Report (EIR) for the NBC Universal Evolution Plan. Burbank recognizes and appreciates Los Angeles' decision to provide a 60-day comment period for the Draft EIR in lieu of the minimum required 45-day period. Burbank also acknowledges that the California Environmental Quality Act Guidelines state that Draft EIR review periods should not be longer than 60 days "except under unusual circumstances" (Section 15105).

Burbank believes that unusual circumstances apply in this situation given Los Angeles' decision to include the entire holiday season within the 60-day comment period. The period from late November until the end of December is typically a very busy time as people prepare for and celebrate the holidays. City staff members are typically out of the office for several days during this time and are unable to devote the needed effort to reviewing a Draft EIR of this volume for a project of this magnitude. The general public is busy making holiday preparations and cannot reasonably be expected to devote the necessary time to review the document at this time of year. Los Angeles' decision to make the comment deadline the first business day of the new year effectively shortens the comment period since government agencies will realistically need to have their comment letters completed well before the actual deadline due to holiday and vacation schedules.

A project of this size and scope has the potential to impact Burbank and its residents and businesses. In the interest of ensuring that the City of Burbank and the Burbank

community, as well as other government agencies and members of the public, have adequate time to thoroughly review the Draft EIR and provide thoughtful comments, the City of Burbank requests that the comment period be extended, at a minimum, an additional 15 days until January 18, 2011. Thank you for your consideration of this request.

Response to Comment No. 28-1

Consistent with the requirements of CEQA, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was originally circulated for public review for a 61-day period, or 16 days more than the CEQA-required 45-day review period. This 61-day comment period began November 4, 2010, and ended January 4, 2011. In response to requests to extend the review period, on November 18, 2010, the comment period was extended by an additional 32 days to February 4, 2011. Thus, the Draft EIR was circulated for a 93-day public review period, which is more than double the 45-day public review period required by CEQA Guidelines Section 15105 when a Draft EIR is submitted to the State Clearinghouse for review by state agencies and beyond the time period requested by the commenter. In addition, a public comment meeting was held on December 13, 2010.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 29

Gabriel Salazar
City of Commerce | Planning Division
gabriels@ci.commerce.ca.us

Comment No. 29-1

Staff has determined that the City of Commerce does not have any comments or concerns regarding the project.

Response to Comment No. 29-1

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 30

Anne Rifat
Anne Rifat Real Estate, Inc.
6858 Los Altos Place
Hollywood, CA 90068

Comment No. 30-1

It was important to me that the environmental impact report for the NBC Universal plan outlined the significant investment the studio will make in transit improvements, beyond just widening and re-striping streets. I think the incentive program they will implement to encourage workers and residents to take public transit is a brilliant idea and one that people will appreciate. Getting more people out of their cars is a good way to go. We all spend too much wasted time in our cars with idling engines burning fuel, none of which helps the environment and our air quality.

Response to Comment No. 30-1

The comments in support of the Project are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 31

Dennis J. Huang
Executive Director
Asian Business Association
120 S. San Pedro Street, Suite 523
Los Angeles, CA 90012
dennis@aba-la.org

Comment No. 31-1

On behalf of the Asian Business Association (ABA), I am writing to you to so express our support for NBC Universal's proposed development at Universal City as the most significant infill project in Los Angeles history and a cornerstone in ensuring a vital and sustainable 21st century community and economy for our region.

Asian Business Association is the premiere non-profit organization that serves the needs of Asian Pacific Islander business owners and professionals. ABA has been proactively assisting these businesses gain access to economic opportunities and advancement since 1976. ABA has an active membership base of over 500, and offers programs to help these businesses grow. Furthermore, ABA offers a platform for corporations to reach Asian business owners and professionals throughout Southern California.

As the largest project of its kind in the United States, NBC Universal's plan represents a committed development investment of $3 billion that will not only provide much needed economic benefits, but elevate and enhance the region's status as a dynamic entertainment center, and responsibly maximize opportunities to accommodate anticipated regional needs for new jobs, transportation, and economic growth.

With the entertainment and tourism sectors key drivers of our regional economy, this project will amplify growth opportunities by providing a dynamic visual gateway for the visitor experience, providing a variety of entertainment and tourism jobs, boosting an already premier Southern California attraction, and creating additional jobs in these important segments of the regional economy in close proximity to existing jobs, transit and housing opportunities.

As analyzed in the Draft EIR, the project is anticipated to result in the creation of 31,000 construction jobs, and is expected to add 12,000 full- and part-time jobs in a variety of industries, including entertainment and tourism, after completion. The 391-acre project site is expected to include nearly 3,000 residential units, neighborhood shops and restaurants, additional studios and offices for producing movies and television shows, as well as a hotel, parks and open space, community service facilities, shops and tourist attractions.

This pedestrian-friendly, mixed-used project represents a responsible, prudent and forward-thinking approach to development by accommodating existing community concerns, maximizing housing to meet regional needs - consistent with the City and County General Plans and the SCAG's Regional Housing Needs Assessment - and capitalizing on the proximity to existing employment, infrastructure and services, and major transit corridors.

Response to Comment No. 31-1

The comments in support of the Project are noted and have been incorporated into the Final EIR for review and consideration by been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 31-2

The impact on the residential communities located around the proposed project has been factored across all project areas including aesthetics and views, public services, public safety, air quality, and transportation. Toward this end, NBC Universal is committing $100 million in transit and roadway improvements including a new north-south street running parallel to Barham Boulevard and served by shuttle buses to the subway stop on Lankershim Boulevard, a new ramp and a new interchange on the 101 Freeway, which would also be widened. From this investment, as much as $200 million more in state and federal transportation funding could become available for freeway improvements.

Response to Comment No. 31-2

With respect to transportation improvements, the Project would be required to implement all of the mitigation measures required as part of the Project's approvals, independent of their actual cost (i.e., the total cost to complete these measures is not capped at a certain dollar amount). The value of the transportation improvements that are referenced in the comment reflect estimates generated by the Project Applicant. Please note that the regional freeway improvements mentioned at the end of the comment are not part of the Project's transportation improvements, and the potential benefit of those improvements have not been incorporated into the Project's traffic analysis. For further information regarding the freeway improvements, see Topical Response No. 6: Freeway Improvements (see Section III.C, Topical Responses, of this Final EIR).

Comment No. 31-3

It is clear that this proposed project is precisely the kind of well thought-out development that our region needs and holds invaluable potential for elevating our economy and quality of life. With a strong track record of responsible stewardship and economic and community

commitment and involvement, NCB [sic] Universal is proposing an accountable development that addresses a variety of concerns including traffic.

Asian Business Association urges the City and County of Los Angeles to take the steps necessary to help bring this project to fruition, including approval of the project EIR and annexation/detachment objectives to establish jurisdictional boundaries.

Response to Comment No. 31-3

The comments in support of the Project are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 32

Dennis Hathaway
President
Coalition to Ban Billboard Blight
2700 Military Ave.
Los Angeles, CA 90064
dennis@banbillboardblight.org

Comment No. 32-1

The Coalition to Ban Billboard Blight represents individuals, homeowners associations, civic organizations, and other community groups in the city of Los Angeles. Our mission is to advocate for public policies, regulations, and decisions that protect the city's visual environment from a proliferation of outdoor advertising. The following comments on the referenced DEIR are limited to sections concerning visual qualities and the impacts of signage.

The referenced DEIR for this project fails to identify significant environmental impacts associated with signage, and fails to propose adequate mitigations for the impacts it does identify. These impacts, discussed below, fall into the categories of aesthetics, traffic safety, and light trespass. The DEIR also fails to address the issue of the cumulative impact of signage that could result from extensive signage proposed by other projects in the area, most notably the adjacent Metro Universal project. And finally, the DEIR fails to acknowledge a conflict that would occur between a proposed sign district and an existing specific plan in the area. We urge rejection of the DEIR until it is revised to identify all significant impacts and propose effective mitigations.

A. AESTHETICS, TRAFFIC SAFETY, LIGHT TRESPASS Note: Some of the signage may cause impacts in all three categories, while others may only relate to one or two of the categories.

Response to Comment No. 32-1

Impacts related to traffic, aesthetics, natural light, artificial light, and public safety are discussed in the Draft EIR in the following sections: IV.B.1, Traffic/Access – Traffic/ Circulation; IV.D, Visual Resources; IV.E.1, Light and Glare – Natural Light; IV.E.2, Light and Glare – Artificial Light; and IV.K.2, Public Services – Police/Sheriff.

Specific comments regarding the Draft EIR are provided and responded to below. With regard to the Metro Universal project, please see Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, of this Final EIR). The

comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 32-2

Aesthetics

1) The Lankershim Edge Sign District proposes to allow five electronic message signs of up to 1,000 sq. ft. each and six supergraphic signs with the commercial message limited to 500 sq. ft. but no overall size limit. The adjacent Studio Administration Sign District proposes to allow five electronic message signs up to 1,000 sq. ft. and three supergraphic signs with the same limits as above. This means 10,000 sq. ft. of brightly-lighted electronic advertising for products and services along heavily-traveled Lankershim Blvd. and just a few hundred feet from the Hollywood freeway, plus supergraphic signage that would be limited to 3,500 sq. ft. for commercial content but allowed to be limited in overall size only by the height and width of the building to which the signs are attached. Thus, at a bare minimum there would be almost 14,000 sq. ft. of outdoor advertising in a concentrated area, or the equivalent of at least 20 full-sized billboards.

Both supergraphic and electronic message signs have been controversial in Los Angeles and other parts of the country for their intensive impact on the visual environment and aesthetics of a city's landscape. In fact, the city council recently banned any new supergraphic signs within the Hollywood sign district, in large part because of the public outcry and myriad complaints about how these signs obscure architecture and dominate their surroundings with sales pitches to a captive audience of motorists and pedestrians. Likewise, electronic billboards have caused a public outcry from the moment they first appeared three years ago, because of the way the quality and intensity of their ads dominate their surroundings.

Response to Comment No. 32-2

The statement is incorrect with respect to the signage proposed within County Sign District 1—Lankershim Edge Sign District. Pursuant to Section 18.C.3.e. of the proposed County Specific Plan, a maximum of two (2) Electronic Message and three (3) Supergraphic Signs are permitted within the Lankershim Edge Sign District. Further, pursuant to Section 9.3.D. of the proposed City Specific Plan, a maximum of five (5) Electronic Message and three (3) Supergraphic Signs are permitted within the Studio Administration Sign District (Sign District 2A).

Electronic Message Signs regulations are set forth in the proposed City and County Specific Plans (see Appendices A-1 and A-2 of the Draft EIR) and, in addition to limiting the number of such signs, address the following: (1) maximum Sign Area per individual sign; (2) height of sign; (3) minimum distances between Electronic Message Signs;

(4) locations where these types of signs are permitted; (5) lighting limitations; and (6) limitations on the hours of operation.

Supergraphic Sign regulations are also set forth in the proposed City and County Specific Plans (see Appendices A-1 and A-2 of the Draft EIR) which would, among other things, limit the number and location of such signs and the size of the Commercial Message.

As discussed on page 1097 in Section IV.D, Visual Qualities, of the Draft EIR, given the existing uses presently located along the eastern side of Lankershim Boulevard, no substantial changes in contrast would occur, since signage would be consistent with the existing urban character and entertainment center uses within this area. Signage within the Lankershim Frontage View Quality Area could include Supergraphic signs within County Sign District 1 and City Sign District 2A, as well as off-site signs within City Sign District 2A. As noted in the Draft EIR, in adopting the Citywide ban on off-site and Supergraphic signs the City determined that Supergraphic signs and off-site signs create substantial adverse aesthetic impacts. Therefore, these off-site and Supergraphic signs would result in a significant impact to the visual character of the Lankershim Frontage Visual Quality Area. However, as discussed above, the proposed City and County Specific Plans include limitations on the location of Supergraphic and Electronic Message Signs and restrictions on the lighting of Electronic Message Signs. Further, the Project would substantially improve the visual character of the Lankershim Frontage View Quality Area through the implementation of streetscape improvements and the development of new buildings within the Lankershim Frontage Visual Quality Area that would replace the existing disconnected improvements with a cohesive and integrated streetscape design that would visually integrate public and private improvements and would promote visual compatibility with the surrounding neighborhoods. These Project improvements to the existing visual character of this area would reduce visual impacts along the Project's Lankershim Boulevard frontage to a less than significant level.

Comment No. 32-3

2) Two proposed signs, a double-faced sign at Cahuenga Blvd. and Universal Studios Blvd., and a single-faced sign at Barham Blvd. and Buddy Holly Drive, pose significant impacts upon the aesthetics of the surrounding area. These signs, proposed to be electronic and contain off-site advertising, could be up to 1,000 sq. ft. per face and 30 ft. high. Again, this kind of electronic signage would dominate the surroundings, as well as be visible from a considerable distance, particularly for those living in the live-work lofts west of the 110 freeway, and the residential areas west of Cahuenga Blvd.

Response to Comment No. 32-3

The signs referenced in the comment consist of proposed City Specific Plan Sign Districts 2C and 2D of the proposed City Specific Plan. Potential impacts related to the proposed Project signage are discussed in the relevant sections of the Draft EIR (e.g., Section IV.D, Visual Qualities; Section IV.E.2, Light and Glare – Artificial Light, etc.) Sign District 2C will no longer be included in the proposed Universal City Specific Plan. The Project does not propose modifications to the Ventura–Cahuenga Boulevard Corridor Specific Plan. Sign District 2D would provide for the modification of the existing sign. The proposed City Specific Plan would include restrictions on the lighting of Electronic Message Signs. Further, as shown in Figures 98 and 99 in Section IV.D, Visual Qualities, of the Draft EIR, Sign District 2D is proximate to the South Back Lot Visual Quality Areas. Draft EIR Figures 114 through 117 depict visual simulations of the proposed Project Site with signage as seen from Viewpoints 14 through 17 (see Figure 101), which constitute views from the off-site residential areas to the south (west) of Cahuenga Boulevard and the Hollywood Freeway. Of note, Viewpoints 14 through 17 encompass a large viewing area with varying topography which reflect different viewing angles and visual relationships to the Project Site ranging from Mulholland Ridge at the top (View 14) to lower Cahuenga Pass East elevations (View 17).

As concluded in Section IV.D, Visual Qualities, of the Draft EIR, no substantial changes to contrast from Viewpoint 14 (including the Universal City Overlook along Mulholland Drive) would occur, as the placement of signage would blend in with the existing development on the Project Site. Thus, while additional signs may be visible from this location, the overall character of the area and the Project Site as seen from this height and distance would appear similar to current conditions. As concluded on page 1087 in Section IV.D, Visual Qualities, of the Draft EIR, as no substantial changes in contrast, coverage, or prominence would occur, impacts to visual character from the Mulholland Ridge area would be less than significant.

As discussed in Section IV.D, Visual Qualities, of the Draft EIR, Project signage in the landscaped slope south of Universal Hollywood Drive could represent a change in contrast within the east-central portions of the Cahuenga Pass neighborhood (Viewpoints 15 through 17). However, since this change would be occurring within a wide field of view wherein other visual resources would remain visible, no substantial changes in coverage would occur. As concluded on page 1089 in Section IV.D, Visual Qualities, of the Draft EIR, the prominent view of the area would not substantially change with Project signage when viewed from Viewpoints 15 through 17 and Project impacts to the Cahuenga Pass East area would be less than significant.

Comment No. 32-4

3) The Universal City Town Center Sign District adjacent to Barham Blvd. proposes to allow up to eight wall signs of 500 sq. ft. displaying off-site advertising. Combined with the areas above, this makes a total of more than 20,000 sq. ft. of new advertising signage that could display ads to motorists, pedestrians, and nearby residents for fast food, movies and TV shows, beer and liquor, automobiles, and other products and services.

This signage represents a huge negative impact to the aesthetics of the area, and some would be visible from residential areas as well as to people using Weddington Park, which is antithetical to the very idea of a park as sanctuary from the urban environment. The DEIR recognizes this impact as significant, but argues that streetscape improvements and the development of new buildings would adequately offset the adverse impacts from the supergraphic and off-site signs. In fact, as stated above, much of the architecture of the new buildings would actually be obscured by the signs, and the visual environment would be dominated by advertising. There is no serious demonstration that sidewalks, benches, and other streetscape amenities lessen the impact of being confronted at every turn by multi-story advertising images. While new buildings and streetscape improvements may indeed improve upon the existing aesthetics of the area, there is no reasonable way to argue that this fact mitigates the introduction of thousands upon thousands of square feet of multi-story advertising for products and services. Until real mitigations are proposed, this DEIR should be rejected.

Response to Comment No. 32-4

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. The Project Site is approximately 391 acres in size. The signage referenced in the comment occurs in many different areas of the Project Site ranging from Lankershim Boulevard on the west to the internal Universal Studios Boulevard to Barham Boulevard on the east. In addition, the referenced areas along Barham Boulevard are over one mile apart. As such, it would not be possible to view the signage in all of these areas simultaneously. On that basis, the suggestion that the amount of signage referenced in the comment could be viewed from any single location is incorrect. Further, the Universal City Town Center Sign District would be located more than 4,200 feet away and not visible from Weddington Park. Additionally, the proposed City and County Specific Plans contain regulations with respect to type, size, and location of signage that promote compatibility with the surrounding land uses. One of the purposes of these regulations is to ensure that signs would not dominate the visual environment but would diversify the visual environment consistent with what one would expect in one of the City's Regional Centers, as designated within the City's General Plan Framework Element (see Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft

EIR for additional information). Further, the City of Los Angeles General Plan Framework defines Regional Centers as focal points of regional commerce, identity and activity containing a diversity of uses whose physical form is substantially differentiated from the lower-density neighborhoods of the City (refer to the City of Los Angeles General Plan Framework Chapter 3—Land Use Goals, Objectives and Policies, Issue Two: Uses, Density, and Character, Regional Centers). As concluded in the Draft EIR in Section IV.D, Visual Qualities, and summarized on page 1102, Project signage from all viewpoints would not result in substantial adverse changes to the environment and, as such, impacts regarding visual resources attributable to Project structures and signage would be less than significant. See also Response to Comment No. 32-2, above.

Comment No. 32-5

Traffic Safety

The potential negative impact of electronic advertising signs has been raised numerous times, most recently in a 2009 study commissioned by the Association of State Highway and Transportation Officials. (Safety Impacts of the Emerging Digital Display Technology for Outdoor Advertising Signs) In addition, the Federal Highway Administration has been conducting a study of motorist distraction caused by electronic signs, and is expected to issue a final report later this year. However, scientific studies aren't needed to tell us that one of the attractions of electronic signs for advertisers is the attention-getting power of the signs, with their sharp, intense light and colors. There is nothing in the DEIR that addresses this issue, even though some of these signs will be directly in the view of motorists on Cahuenga Blvd, Barham Blvd., and probably on Lankershim Blvd., although exact locations in the latter area are not specified. This is a very serious issue in the area of Lankershim Blvd. because of the heavy volume of pedestrian traffic, and the danger posed to those pedestrians by any distractions to drivers. The impact of electronic signage on traffic safety in other project areas is impossible to ascertain because the location and orientation of the signs isn't specified. But the failure of the DEIR to recognize this impact is a serious flaw and no EIR should be certified without it.

Response to Comment No. 32-5

The potential traffic safety impacts of proposed Project signage is addressed on page 653 of the Draft EIR. In addition, the commenter is referred to Topical Response No. 9: Signage and Traffic Safety, in Section III.C, Topical Responses, of this Final EIR for further discussion of issues relating to the potential traffic safety impact of signs proposed as part of the Project.

Comment No. 32-6

Light Trespass

The DEIR states that the impacts of brightness and light trespass upon residential areas would be less than significant because of lighting regulations and restrictions on signage. With regard to electronic signs, a major potential source of light trespass, the restrictions include a lighting limit of three footcandles between sunset and 10 p.m. and two footcandles between 10 p.m. and 2 a.m., with the signs off between 2 a.m. and 7 a.m. The lighting would be measured at the nearest residential property line.

This mitigation is completely inadequate. The L.A. Municipal code has long had a two foot-candle limit for billboards, but this was developed to limit light trespass from conventional billboards and other static signs, and fails to account for the effect of digital billboards and other forms of electronic message signs. That failure has been amply demonstrated over the past several years with the conversion of a number of conventional billboards to digital in proximity to residential properties. Even though readings taken from some of those properties were within the 2.0 footcandles limit, the quality and intensity of the light was much more distracting and annoying to residents than a conventionally lighted billboard. In addition, it is reasonable to assume that the electronic message signs in this project will be changing at some interval, and the experience with billboards shows that this change creates a change in the illuminance some distance from the sign, creating something akin to a constant flicker that proved to be highly annoying and disturbing to residents of nearby homes and apartments.

Many jurisdictions, including such large cities as Baltimore and Kansas City, limit light level measured at residential property lines to 0.5 footcandles, in recognition of the fact that not only is two footcandles much too high, it doesn't account for the increased intensity of lighting from LED's and other electronic devices. In fact, jurisdictions dealing with the regulation of electronic signs are increasingly finding it more effective to limit the luminence [sic] of the sign itself, rather than the amount of light falling at a particularly [sic] property line. This luminence [sic] can be measured with precision instrumentation, and limited to a figure that has been shown by expert lighting studies to mitigate the adverse affects of light at a particular distance from a sign.

Response to Comment No. 32-6

The existing City of Los Angeles Municipal Code limits light trespass from signs to a maximum of 3 foot-candles above ambient lighting at all times of the day. (LAMC 14.4.4.E). The proposed Specific Plan regulations for Electronic Message signs would be more restrictive than the existing in the LAMC, as the proposed Specific Plan would limit the light

trespass to 2 foot-candles from 10:00 P.M. to 2:00 A.M. and require that the signs be turned off after 2:00 A.M.

As discussed in Appendix G, Artificial Light Technical Report, the impact of the illuminated signs was evaluated. (Draft EIR, Appendix G, pages 129–137.) The modeling analysis confirmed that with implementation of the signage regulations in the proposed City and County Specific Plans, proposed signage would not result in significant light trespass or brightness impacts at any of modeled viewpoints. Therefore, light trespass and brightness impacts from the Project's potential signage lighting would be less than significant. (Draft EIR, page 1275; Appendix G, pages 134 and 136–137).

Contrary to the suggestion in the comment, the measured light trespass illuminance values at a nearby property line do not change based on the type of light source. As discussed on page 1234 of Section IV.E.2, Light and Glare – Artificial Light, of the Draft EIR, light trespass is measured in terms of illuminance, which measures the amount of illumination that falls on a given area from a light source. Thus, the type of light source (i.e., billboard or digital display) does not affect the measurement of a 2-foot-candle illuminance threshold. The comment also suggests that certain jurisdictions are shifting to regulating electronic signs by limiting the luminance of the sign (i.e., the brightness), rather than the amount of light falling at a property line. As noted above, the Artificial Light Technical report concluded that with implementation of signage regulations in the proposed City and County Specific Plans, signage impacts would not result in significant light trespass impacts at nearby properties. It is also important to note that the Draft EIR also addressed potential impacts to light aesthetics as viewed from sensitive uses in close proximity to the Project Site. (Draft EIR, Section IV.E.2, Light and Glare – Artificial Light, pages 1232–1233.) As noted on page 1248 of the Draft EIR, such analysis assumed that the "proposed Project's lit signature program would evolve at the maximum envelope permitted under the proposed Specific Plans, including the maximum size, height, and number of lit signs permitted in different areas of the site." The Draft EIR concluded that no significant light aesthetics impacts would occur. (Draft EIR, pages 1260–1269.) The comment is noted and has been incorporated in the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 32-7

B. CUMULATIVE IMPACTS OF SIGNAGE

The California Environmental Quality Act requires the evaluation of negative impacts not only from the development in question, but from both existing and future developments in the same area. In the case of the Universal Evolution project, the DEIR has failed to adequately evaluate and propose mitigations for these negative impacts as related to signage. This is particularly relevant in view of the adjacent Metro Universal project, in

which more than 50,000 square feet of electronic and supergraphic advertising signage has been proposed. These two projects together would have a huge impact on the immediate area in terms of traffic safety and light trespass, and would have a negative impact on aesthetics and visual quality of a wide area. The DEIR should be rejected for its failure to acknowledge and propose any mitigations for this very significant cumulative Impact.

Response to Comment No. 32-7

The cumulative aesthetic, visual quality and lighting impacts of the proposed Project and the Metro Universal project are analyzed in the Draft EIR. (Draft EIR, pages 1105–1106 and 1276–1277.) The Project's incremental effects on the significant impacts caused by the Metro Universal project, which is no longer proposed, were considered and determined not to be cumulatively considerable. The commenter is referred to Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, of this Final EIR), regarding the Metro Universal project.

Comment No. 32-8

C. CONFLICT WITH EXISTING SPECIFIC PLAN

The proposed City Specific Plan appears to overlap the existing Mulholland Scenic Parkway Specific Plan on the east side of the 110 [sic] freeway in the Barham Blvd. area. This fact is relevant to the proposed Universal City Barham sign at the intersection of Barham Blvd. and Buddy Holly Drive. While the Mulholland Plan does not directly address signage, it would seem that at 1,000 sq. ft. electronic sign with off-site advertising would hardly be compatible with one of the purposes of the plan, which is "To reduce the visual intrusion caused by excessive lighting." In addition, it is clear that any structure such as the proposed sign would be required to go through the Mullholland [sic] plan's design review process for determination of compatibility with the scenic parkway environment. The DEIR should be rejected for its failure to acknowledge the Mullholland [sic] plan and the impacts as related to its regulations.

Response to Comment No. 32-8

The comment addresses the proposed modifications to the existing sign located near the intersection of Barham Boulevard and Buddy Holly Drive (the "Barham Sign"). The Draft EIR (Section II, Project Description, page 348) accurately discusses that a small portion of the Project Site is currently located within the Outer Corridor of the City's Mulholland Scenic Parkway Specific Plan. As one of the requested entitlement actions, the Project proposes revising the boundaries of the Mulholland Scenic Parkway Specific Plan to remove this area of the southeastern most tip of the Project Site from the Mulholland Scenic Parkway Specific Plan area. With adoption of the requested amendment, no

incompatibility with the requirements of the Mulholland Scenic Parkway Specific Plan would occur. The Project's impacts related to the Mulholland Scenic Parkway Specific Plan policies are discussed in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR and concluded to be less than significant.

The area of the Barham Sign is included within the proposed Universal City Specific Plan. As discussed in Response to Comment No. 32-6, above, the proposed City Specific Plan would impose a series of restrictions on Electronic Message signs. As discussed in Section IV.E.1, Light and Glare – Artificial Light, pages 1260–1277 of the Draft EIR, the Draft EIR analyzed the potential impact of artificial light from the Project, including from signage, and concluded that impacts would be less than significant. See also Response to Comment No. 32-3, above, regarding the Barham Sign.

Comment Letter No. 33

Dennis Hathaway
President
Coalition to Ban Billboard Blight
2700 Military Ave.
Los Angeles, CA 90064
dennis@banbillboardblight.org

Comment No. 33-1

I have a few of questions about the Universal DEIR that I hope you would be able answer before I submit my comments.

1. The City Specific Plan Area appears to overlap the Mullholland [sic] Scenic Parkway specific plan area. If this is true, what does it mean in terms of the signage entitlements, specifically, that 1,000 square ft. electronic sign at the corner of Barham Blvd. and Buddy Holly Way?

Response to Comment No. 33-1

The comment addresses the proposed modifications to the existing sign located near the intersection of Barham Boulevard and Buddy Holly Drive (the "Barham Sign"). The Draft EIR (See Section II, Project Description, page 348) explains that a small portion (i.e., less than 2 acres) of the Project Site is currently located within the Outer Corridor of the City's Mulholland Scenic Parkway Specific Plan. As one of the requested entitlement actions, the Project proposes an amendment to the Mulholland Scenic Parkway Specific Plan to remove this area of the Project Site from the Outer Corridor of the Mulholland Scenic Parkway Specific Plan area. With adoption of the requested amendment, no incompatibility with the requirements of the Mulholland Scenic Parkway Specific Plan would occur. There is an existing sign in this southeastern tip of the Project Site that is approximately 1,000 square feet in sign area and 20 feet in height from grade. The area of the Barham Sign is included within the proposed Universal City Specific Plan. Pursuant to the proposed City Specific Plan, the existing sign could be modified to be an animated, banner, billboard, electronic message, mounted pole, or pillar sign, 1,000 square feet of sign area at a maximum height of 30 feet above grade. The proposed City Specific Plan would limit the light from Electronic Message signs from sunset to 2:00 A.M. and require that Electronic Message signage be turned off from 2:00 A.M. to 7:00 A.M. As discussed in pages 1260–1277 of Section IV.E.2, Light and Glare – Artificial Light, of the Draft EIR, the Draft EIR analyzed the potential impact of artificial light from the Project, including from

signage, and concluded that impacts would be less than significant due to the regulations in the proposed City and County Specific Plans.

As discussed on pages 1086–1087 of Section IV.D, Visual Qualities, of the Draft EIR, with regard to visual character, from the Mulholland Ridge area (i.e., the portion of the Cahuenga Pass East area north of Mulholland Drive), the Project Site blends into the larger urban landscape. As such, no substantial changes to contrast would occur from this area, as new structures and the placement of signage would blend in with existing development on the Project Site. Similarly, substantial changes to prominence would not be anticipated, since this area would continue to look down on the Project Site. While some Project structures or signs may be slightly more visible from this area and, subsequently, cover more of the available viewshed, there would not be any substantial changes to prominence as viewed from the Mulholland Ridge area. In addition, because of the wide field of view available from this location over and across the Project Site, no substantial changes in coverage would occur with development of the proposed Project. For these reasons, impacts to visual character from the Mulholland Ridge area would be less than significant.

Comment No. 33-2

2. What is the status of the Metro Universal project? I couldn't find any mention of the supergraphic signage proposed for that project in the evolution DEIR, and it seems that there is a very significant cumulative impact of the two projects on the Lankershim Blvd, [sic] area and views to the west along Cahuenga and in Studio City.

Response to Comment No. 33-2

As noted in the Project Description of the Draft EIR, the proposed Metro Universal project at the Universal City Metro Red Line Station site was an independent development project and is not part of the proposed Project. The Metro Universal project and its potential environmental effects and mitigation measures were analyzed in a Draft EIR for the Metro Universal project published in August 2008. The potential environmental impacts and mitigation measures of the NBC Universal Evolution Plan Project were analyzed and disclosed in the Evolution Plan Draft EIR in compliance with CEQA, and, consistent with CEQA requirements. The cumulative aesthetic, visual quality and lighting impacts of the proposed Project and the Metro Universal project were analyzed in the Draft EIR. (See pages 1105–1106 and 1276–1277 of the Draft EIR.) The Project's incremental effects on the significant impacts caused by the Metro Universal project, which is no longer proposed, were considered and determined not to be cumulatively considerable. Without the Metro Universal project, the Project's incremental effects on visual character and views would not be cumulatively considerable as well.

The commenter is referred to Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, of this Final EIR) regarding the Metro Universal project.

Comment No. 33-3

3. Can comments be submitted by e-mail? If so, to your address?

Response to Comment No. 33-3

Comments submitted by email were accepted and responded to in the Final EIR.

Comment Letter No. 34

Lois Becker
President
Bel Air Skycrest Property Owners' Association
3100 Corda Dr.
Los Angeles, CA 90049
loismark@gmail.com

Comment No. 34-1

Attached please find a letter from Bel Air Skycrest Property Owners' Association (BASPOA) regarding the draft EIR for the NBC Universal Evolution Plan.

Response to Comment No. 34-1

The introductory comment is noted and will be incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 34-2

I am writing to you on behalf of Bel Air Skycrest Property Owners' Association about the NBC Universal Evolution Plan. Our foremost concern is the issue of consistency with a number of existing City and County plans, including the LA River and the City/County bike path plans – and also the Mulholland Scenic Parkway Specific Plan. These plans are all products of deep thought and long dialogue about the past, present and future of our city. Approval of a project that violates these plans sends a message that the "evolution" of NBC Universal/Comcast is more important than the evolution of Los Angeles.

Response to Comment No. 34-2

Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, analyzed the Project in relation to adopted planning policies and concluded that Project impacts with respect to land use plans would be less than significant. With regard to the river, as explained on pages 418–419 in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, the northeastern portion of the Project Site that abuts the Los Angeles River Flood Control Channel is within the jurisdiction of the City of Los Angeles. The remaining approximately three-fourths of the northern edge of the Project Site is adjacent to River Road, a two-lane roadway that runs along the Los Angeles River Flood Control Channel. The majority of this northern edge is within the jurisdiction of the County of Los Angeles

and the majority of the River Road roadway is owned by the Los Angeles County Flood Control District.

As stated in the Draft EIR, the Applicant will cooperate with the County, City and other agencies to accommodate the future use of the County land for public use as contemplated by the County River Master Plan and to continue use, if allowed by the County, of a portion of River Road for studio access. In addition, the Project, as shown in Figure 21 on page 336 in Section II, Project Description, of the Draft EIR, includes the pedestrian/bicycle connection to CityWalk, as contemplated by the County River Master Plan. Further, in the northeastern portion of the Project Site that is within the City's jurisdiction and owned by the Applicant, the Project proposes a River Trailhead Park that would provide access to the Los Angeles River Flood Control Channel, and connect the existing bike path along Forest Lawn Drive and the proposed bike path along the proposed North-South Road. If the County implements a public path on the County-owned portion of the Los Angeles River Flood Control Channel frontage, that path could be connected to the proposed River Trailhead Park and the internal bike path along the proposed North-South Road. As explained in more detail on pages 496–497 and 523–524 of the Draft EIR, with these and other project design features, the Project furthers the goals and objectives of, and would not be inconsistent with, the Los Angeles River Master Plan and the Los Angeles River Revitalization Master Plan.

The discussion of the proposed Project's consistency with land use plans in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR includes the recently adopted Los Angeles Bicycle Plan.[43] The Draft EIR notes that at the time of preparation of the Draft EIR the City was updating the Bicycle Plan, which is part of the Transportation Element. As discussed on pages 512–516 of the Draft EIR, the Project would not be inconsistent with the policies of the City of Los Angeles General Plan Transportation Element.

The Los Angeles Bicycle Plan was adopted in March 2011, after the release of the Draft EIR for the Project. The Los Angeles Bicycle Plan is an update to the Bicycle Plan adopted by the City in 1996 and re-adopted in 2002 and 2007. As stated in the Los Angeles Bicycle Plan, "[i]t establishes long-range goals, objectives, and policies at a citywide level and contains a broad range of programs that constitute the steps the City intends to take in order to become a more bicycle-friendly Los Angeles." As discussed on page 517 of the Draft EIR, the Project would promote the goals and objectives of the

---

[43] *The Los Angeles Bicycle Plan was adopted with amendments by the Los Angeles City Council on March 1, 2011, after circulation of the Evolution Plan Draft EIR. The Bicycle Plan was referred to in the Draft EIR as "Draft Bicycle Plan" because it had not been adopted. In this Final EIR it is referred to as "Los Angeles Bicycle Plan."*

Bicycle Plan by providing public access to the river, a variety of recreation opportunities and network of multi-use trails, and expanding open space. The proposed River Trailhead Park would also provide a connection, via Lakeside Plaza Drive, to the existing bicycle path to the east on Forest Lawn Drive. Therefore, the Project would not be inconsistent with the Los Angeles Bicycle Plan. Also, as discussed, the Project does not preclude a bike path along the Los Angeles River Flood Control Channel.

The County of Los Angeles 2011 Bicycle Master Plan ("2011 County Bicycle Plan") was adopted by the County Board of Supervisors on March 13, 2012. The 2011 County Bicycle Plan is an update to the 1975 County Bikeway Plan and is a sub-element of the Transportation Element of the Los Angeles County General Plan. The 2011 County Bicycle Plan is intended to guide the development and maintenance of a comprehensive bicycle network and set of programs throughout the unincorporated communities of the County of Los Angeles for 20 years (2012 to 2032). It proposes to build on the existing 144 miles of bikeways throughout the County, and install approximately 832 miles of new bikeways in the next 20 years.

With respect to Universal City, the 2011 County Bicycle Plan proposes a 1.0 mile long Class I bicycle path along the Los Angeles River from Lankershim Boulevard to 0.2 mile west of Barham Boulevard. In addition, page 122 of the 2011 County 2011 Bicycle Plan states, "Universal City consists of hilly private land and streets, except for access roads that connect visitors to the Universal Studios Theme Park and Universal City Walk. Although the community has no residents, the area is a major employee and tourist destination. Shuttles transport workers and visitors between the area and the nearby Universal City Red Line Metro Station. Due to topographical barriers and the relative absence of major bicycle trip generators, improvements are focused on facilitating connections to bicycle networks and transit hubs in adjacent cities." The 2011 County Bicycle Master Plan was not drafted or adopted at the time of circulation of the Draft EIR for NBC Universal Evolution Plan Project. However, the Draft EIR discusses bicycle facilities in connection with the County River Master Plan (e.g., page 418 of the Draft EIR).

With regard to the Mulholland Scenic Parkway Specific Plan, as one of the requested entitlement actions, the Project proposes an amendment to the Mulholland Scenic Parkway Specific Plan to remove a small (less than 2 acres) portion of the southeastern-most tip of the Project Site from the Outer Corridor of the Mulholland Scenic Parkway Specific Plan. Based on the analysis included in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, this deletion would be less than significant. Further, the analysis provided in the Draft EIR as it relates to the Mulholland Scenic Parkway Specific Plan (pages 524–526) states that the proposed Project would not be inconsistent with Mulholland Scenic Parkway Specific Plan goals to design projects that would be compatible and would preserve and enhance the range of visual experiences within the

parkway environment; would not be inconsistent with objectives to ensure that landscape plantings are compatible with the existing native vegetation, would soften and shield structures from view, camouflage retaining and other walls, and complement views; would not be inconsistent with Mulholland Scenic Parkway Specific Plan design guidelines to emphasize a variety of native and nonnative plants in the landscape design, retaining those existing native plants whenever possible, recognizing that plant materials would be an important factor in hillside erosion control; would not be inconsistent with Mulholland Scenic Parkway Specific Plan objectives to ensure that all necessary utility-related structures, including above-ground facilities, would be designed to be as inconspicuous as possible; would incorporate design standards addressing height, lighting, landscape, setbacks, walkability, separation between structures, and exterior structural facades not inconsistent with the general objectives and purpose of the Mulholland Scenic Parkway Specific Plan design guidelines; would not be inconsistent with existing Mulholland Scenic Parkway Specific Plan policies to assure that land uses are compatible with the parkway environment, and therefore land use impacts with respect to the intention of the Mulholland Scenic Parkway Specific Plan to preserve the visual quality of natural open space would be less than significant.

Comment No. 34-3

The Santa Monica Mountains Conservancy letter addresses these issues far better (and in greater detail) than I can hope to do, and our community supports what has already been said.

Response to Comment No. 34-3

The comment notes support for comments submitted by the Santa Monica Mountains Conservancy. The comments submitted by the Santa Monica Mountains Conservancy are included and responded to in the Final EIR as Letter No. 17. Please refer to Response to Comment Nos. 17-1 to 17-17, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 34-4

But I do want to add a few more words. As a Mulholland adjacent community, we are extremely concerned about preserving Mulholland's aesthetic and environmental character, from one end of the curvaceous corridor to the other, and about related issues of open space and of wildlife habitat throughout LA. If the Final EIR exempts the NBC Universal project from the Mulholland Scenic Parkway Specific Plan, with its strict requirements as regards grading, signage, lighting, and uses, it will be a huge disservice to our city, an attack on the always delicate balance between urban development and wilderness.

Response to Comment No. 34-4

As one of the requested entitlement actions, the Project proposes revising the boundaries of the Mulholland Scenic Parkway Specific Plan to remove a small portion of the southeastern-most tip of the Project Site from the Outer Corridor of the Mulholland Scenic Parkway Specific Plan area, as noted in Response to Comment No. 34-3, above. The area that is the subject of this request totals less than 2 acres of the 391-acre Project Site and is proposed to be included within the proposed Universal City Specific Plan area in order to create unified and coherent regulations for all portions of the Project Site to be located within the City. Based on the analysis set forth in Section IV.A.1, Land Use – Land Use Plans/Zoning, the Draft EIR concludes that the deletion of the small portion of the Project Site from the boundaries of the Mulholland Scenic Parkway Specific Plan would be less than significant.

For informational purposes, the Mulholland Scenic Parkway Specific Plan area is divided into two areas—the Inner and Outer Corridors. The boundaries of these corridors are determined via distance from the Mulholland Scenic Parkway right-of-way, with the outermost boundary of the Outer Corridor extending 0.5 mile outward from the Mulholland Drive right-of-way. Mulholland Drive reaches its eastern terminus in the Project area where it turns from a primarily east-west road to a north-south road as it connects with Cahuenga Boulevard. Based on these conditions, the strict application of the Outer Corridor boundary places the eight-lane Hollywood Freeway and areas on the north (far) side of the freeway within the boundaries of the Mulholland Scenic Parkway Specific Plan (see Figure 28 on page 433 of the Draft EIR). As concluded on page 525 of the Draft EIR in Section, IV.A.1, Land Use – Land Use Plans/Zoning, since the context of the Project Site is dominated by the Hollywood Freeway and is not contiguous with other areas within the Mulholland Scenic Parkway Specific Plan Outer Corridor, land use impacts with respect to the intention of the Mulholland Scenic Parkway Specific Plan to preserve the visual quality of natural open space would be less than significant. The analysis goes on to further conclude that the proposed Project would not be inconsistent with existing Mulholland Scenic Parkway Specific Plan policies to preserve the existing residential character of areas along and adjoining the Mulholland Drive right-of-way, to protect all identified archaeological and paleontological resources, and to assure that land uses are compatible with the parkway environment. Therefore, the impact of the Project with respect to the Mulholland Scenic Parkway Specific Plan policies and regulations for the Outer Corridor are concluded in the Draft EIR to be less than significant.

Additionally, the proposed Project development would not be located on or proximal to any designated Prominent Ridge as identified and defined in the adopted Mulholland Scenic Parkway Specific Plan on maps 1B through 6B. As discussed on page 1087 in Section IV.D, Visual Qualities, of the Draft EIR, the primary view resources available from

the Mulholland Ridge geographic area are panoramic views of the San Fernando Valley and Verdugo Mountains in the background. Since the Project would not result in the substantial view coverage of a prominent resource, Project impacts from the Mulholland Ridge geographic area would be less than significant.

Based on the analysis and conclusions presented above, the Draft EIR concludes that the deletion of the small portion of the Project Site from the boundaries of the Mulholland Scenic Parkway Specific Plan would be less than significant. The commenter is referred to Response to Comment No. 34-3 regarding the Mulholland Scenic Parkway Specific Plan's policies and the Draft EIR's conclusion that the Project would not be inconsistent with such policies.

Comment No. 34-5

So, too, if the Final EIR ignores the loss of open space

Response to Comment No. 34-5

As noted in Section IV.I.1.b, Biota, of the Draft EIR, the Project Site has been extensively developed during the past 90 years, with only small pockets of undeveloped areas remaining. The Draft EIR includes an in-depth analysis of the biological resources currently present on the Project Site, sensitive biological resources that are present or have the potential to occur on-site, the potential significance of impacts to these sensitive resources from the proposed Project, and recommends where necessary mitigation measures to avoid, minimize or reduce the significance of any impacts. (See Section IV.I, Biota, of the Draft EIR.) The Project also would include parks, open space and urban areas where species that currently use the Project Site could continue to persist. As described in the Draft EIR (Section II, Project Description, pages 309–313), the proposed Universal City Specific Plan includes the creation of three open space districts that would provide a total of approximately 35 acres of open space with a variety of open space uses in designated areas.

Comment No. 34-6

and the indirect impacts of increased traffic on wildlife connectivity through the Cahuenga Pass.

Response to Comment No. 34-6

While the proposed Project is forecasted to generate additional vehicle trips in the area surrounding the Project Site, these vehicle trips would occur within the existing major roadways. Further, as explained in Section IV.I, Biota, of the Draft EIR, the Project Site is not considered a major wildlife movement corridor or habitat linkage. As discussed on

page 1570 of the Draft EIR and in Appendix K-1, "[t]he areas of habitat on-site may allow for limited movement of larger or more mobile animals (such as the resident deer herd, raccoons, coyotes, bobcats, squirrels) within the Project Site and possibly to the relatively less developed areas and Griffith Park to the east by crossing Barham Boulevard. The physical barriers between the Project Site and the surrounding area include heavy traffic, development, and fences. Wildlife movement between the Project Site and remaining undeveloped habitat to the south in the Santa Monica Mountains is likely to be very limited (except for birds, bats, and insects) due to the lack of physical linkages and the barriers of U.S. Highway 101." As indicated on page 1590 of the Draft EIR and Appendix K-1, "[a]lthough limited wildlife movement may occur between the Project Site and areas to the east, movement of terrestrial animals is unlikely to areas north, south, and west of the Project Site. Therefore the Project Site does not act as a true wildlife corridor, movement pathway, or linkage between larger habitat areas for terrestrial wildlife. Thus, although the Project would result in a loss of some of the relatively natural woodland, scrub and grassland habitats on-site, this would not result in a significant impact to wildlife migration or movement.

Comment No. 34-7

Any of these would be precedent-setting blows from whose repercussions our mountains, their already endangered species, and our equally endangered quality of life might not recover.

Our community urges the Final EIR to reduce scale, mitigate impacts, and honor the planning vision of those who have gone before.

Response to Comment No. 34-7

In the Draft EIR, for all environmental issue areas where significant impacts were identified to potentially occur, project design features and mitigation measures to reduce or eliminate those impacts also have been identified. All significant impacts that are reduced to a less than significant level via recommended project design features and mitigation measures, such as Biota impacts, are discussed in detail in Section IV, Environmental Impact Analysis, of the Draft EIR. In some cases, the project design features and mitigation measures would not be sufficient to completely eliminate the significant impacts. Thus, although potential Project impacts would be mitigated to the extent feasible, as discussed in Section VI, Summary of Significant and Unavoidable Impacts, of the Draft EIR, implementation of the Project would result in impacts that are considered significant and unavoidable. As described in Sections 15121(a) and 15362 of the *CEQA Guidelines*, an EIR is an informational document which will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. "The

purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." (Public Resources Code Section 21002.1(a).) "Each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves *whenever it is feasible to do so*." (Public Resources Code Section 21002.1(b) (emphasis added).) If economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment, the project may still be approved at the discretion of the public agency. (Public Resources Code Section 21002.1(c).) In approving a project which will result in the occurrence of significant effects which are identified in the final EIR but not avoided or substantially lessened, the lead agency must state the specific reasons to support its action in a statement of overriding considerations. The decision whether to approve the Project and adopt a statement of overriding considerations will be made by the decision-makers consistent with CEQA.

Alternatives analyzed in Section V, Alternatives to the Proposed Project, of the Draft EIR, included substantial reductions in development compared to the proposed Project. The commenter is referred to Section V of the Draft EIR for additional information.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 35

James Crank
Owner
The Beverly Garland Hotel
4222 Vineland Ave.
North Hollywood, CA 91602

[Note: Duplicates of the letter provided below were received on 1/24/11, 1/25/11, and 1/27/11]

Comment No. 35-1

I am writing to comment on the NBC Universal DEIR. I believe the report has carefully documented any potential impacts from the proposed project, but more important, it has outlined a comprehensive approach to integrating new development with existing neighborhoods, while investing in significant improvements at the same time.

According to the report, the NBC Universal project will be connected internally and externally. New production facilities, new homes, new jobs at its tourist attractions will be easily accessible by public transit and private transportation management programs. At the same time, substantial improvements will be made to public infrastructure, such as new freeway ramps, improved intersections, and other upgrades to local streets. The value of these connections and improvements is measured in more than money. They will improve circulation not only on the project site, but for many miles around it.

It's hard to think of another major project which has offered such concrete benefits to the community, in ways which will directly improve the quality of life in surrounding neighborhoods. Since the City is unable to make these critically needed changes, the project ought to be approved quickly so this work can go forward.

Response to Comment No. 35-1

The comments in support of the Project are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 36

Thomas Flintoft
David Fleming
Tracy Rafter
BizFed
Los Angeles County Business Federation
1000 N. Alameda St., #240
Los Angeles, CA 90012

[Note: A duplicate of the letter provided below was received on 1/25/11]

Comment No. 36-1

On behalf of the Los Angeles County Business Federation (BizFed), representing 70 top business organizations with nearly 110,000 business owners across our region, we are writing to express our strong support for NBC Universal's proposed development at Universal City as the most significant infill project in Los Angeles history and a cornerstone in ensuring a vital and sustainable 21st century community and economy for our region.

Please see our attached letter of support for your consideration.

On behalf of the Los Angeles County Business Federation (BizFed), representing 70 top business organizations with nearly 110,000 business owners across our region, we are writing to express our strong support for NBC Universal's proposed development at Universal City as the most significant infill project in Los Angeles history and a cornerstone in ensuring a vital and sustainable 21st century community and economy for our region.

As the largest project of its kind in the United States, NBC Universal's plan represents a committed development investment of $3 billion that will not only provide much needed economic benefits, but elevate and enhance the region's status as a dynamic entertainment center, and responsibly maximize opportunities to accommodate anticipated regional needs for new jobs, transportation, and economic growth.

With the entertainment and tourism sectors key drivers of our regional economy, this project will amplify growth opportunities by providing a dynamic visual gateway for the visitor experience, providing a variety of entertainment and tourism jobs, boosting an already premier Southern California attraction, and creating additional jobs in these important segments of the regional economy in close proximity to existing jobs, transit and housing opportunities.

As analyzed in the Draft EIR, the project is anticipated to result in the creation of 31,000 construction jobs, and is expected to add 12,000 full- and part-time jobs in a variety of

industries, including entertainment and tourism, after completion. The 391-acre project site is expected to include nearly 3,000 residential units, neighborhood shops and restaurants, additional studios and offices for producing movies and television shows, as well as a hotel, parks and open space, community service facilities, shops and tourist attractions.

This pedestrian-friendly, mixed-used project represents a responsible, prudent and forward-thinking approach to development by accommodating existing community concerns, maximizing housing to meet regional needs - consistent with the City and County General Plans and the SCAG's Regional Housing Needs Assessment – and capitalizing on the proximity to existing employment, infrastructure and services, and major transit corridors.

The impact on the residential communities located around the proposed project has been factored across all project areas including aesthetics and views, public services, public safety, air quality, and transportation. Toward this end, NBC Universal is committing $100 million in transit and roadway improvements including a new north-south street running parallel to Barham Boulevard and served by shuttle buses to the subway stop on Lankershim Boulevard, a new ramp and a new interchange on the 101 Freeway, which would also be widened. From this investment, as much as $200 million more in state and federal transportation funding could become available for freeway improvements.

It is clear that this proposed project is precisely the kind of well thought-out development that our region needs and holds invaluable potential for elevating our economy and quality of life. With a strong track record of responsible stewardship and economic and community commitment and involvement, NCB [sic] Universal is proposing an accountable development that addresses a variety of concerns including traffic.

BizFed urges the City and County of Los Angeles to take the steps necessary to help bring this project to fruition, including approval of the project EIR and annexation/detachment objectives to establish jurisdictional boundaries.

Response to Comment No. 36-1

The comments in support of the Project are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

With regard to entertainment and tourism, since release of the Draft EIR, the Applicant has entered into an agreement that would allow for the development of a Harry Potter themed entertainment attraction and related uses at the Theme Park. It is anticipated that this attraction would be one of the first new attractions developed as part of the Project.

With respect to transportation improvements, the Project would be required to implement all of the mitigation measures required as part of the Project's approvals, independent of their actual cost (i.e., the total cost to complete these measures is not capped at a certain dollar amount). The value of the transportation improvements that are referenced in the comment reflect estimates generated by the Project Applicant. Please note that the regional freeway improvements mentioned in the comment are not part of the Project's transportation improvements, and the potential benefit of those improvements have not been incorporated into the Project's traffic analysis.

Comment Letter No. 37

Bryce C. Lowery
President, Cahuenga Pass Property Owners' Association
PO Box 1655
Hollywood, CA 90078
bryce_lowery@yahoo.com

[Note: A duplicate of the letter provided below was received on 2/3/11]

Comment No. 37-1

For over fifty years, the Cahuenga Pass Property Owners' Association (CPPOA) has represented the interests of owners and residents of both commercial and residential properties in the Hollywood Hills west of the 101 Freeway, north of Mulholland Drive, and south of Vineland Avenue. There are approximately 1500 homes and businesses in our hillside community. Many of our members work in the entertainment business or in ancillary occupations, so there is a predisposition to be in support of entertainment-related development. However, as our community will be one of those most significantly impacted by the proposed NBC Universal Evolution Plan, our Board of Directors has taken time to review the Plan's DEIR and this letter constitutes our official response. We submit these remarks to become part of the official record as well as part of the FEIR. Unless otherwise stated, please consider statements as well as questions to be in need of an appropriate response from the applicant.

Our concerns and questions are as follows:

Response to Comment No. 37-1

The introductory comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 37-2

Scale of DEIR:

The 39,000 page, twenty-seven volume DEIR for Universal Studios' twenty year Evolution Plan is an unwieldy document. A project of this scope and scale undoubtedly required years to conceptualize and extensive expertise to draft, yet the public, lacking similar resources, is provided only sixty days to read, absorb, understand, and respond to its contents. To ask communities to do so without the aid of professional consultations of

equal caliber to the team that submitted this DEIR seems contrary to the fair and balanced process that we believe should guide transformations to our community.

It is especially unreasonable to release the document just prior to the winter holiday season when people are busy with the obligations of family and friends typical of the end of the year. We believe that denying the community an additional thirty days to compensate for pre-holiday release of the document was wrong. Why are resources not provided, either by the developer or the City or County, to assist the public in this process and why were additional days not granted to review this exceptionally large proposal?

Response to Comment No. 37-2

As required by CEQA Guidelines Section 15151, the Draft EIR provides decision-makers with a sufficient degree of information and analysis for a project of this scope to enable them to make a decision which fully takes into account the Project's potential environmental consequences. As per CEQA Guidelines Section 15123, the Draft EIR includes an executive summary which provides a comprehensive summary of the complete content of the Draft EIR including impact areas, mitigation measures, and areas of controversy. Consistent with CEQA Guidelines Section 15147, the information contained in the Draft EIR included summarized technical data, maps, diagrams, and similar relevant information sufficient to permit a full assessment of the Project's potential significant environmental impacts by reviewing agencies and members of the public. The Draft EIR summarized technical and specialized analysis in the body of the Draft EIR and attached technical reports and supporting information as appendices to the main body of the Draft EIR, consistent with CEQA requirements. (CEQA Guidelines Section 15147.) The Draft EIR is well-organized, allowing for agency and public review. It includes an Introduction and Summary and a detailed Table of Contents, and each subject area is clearly identified and similarly organized to facilitate the location and review of the related information.

Consistent with the requirements of CEQA, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research, and was originally circulated for public review for a 61-day period, or 16 days more than the CEQA-required 45-day review period. This 61-day comment period began November 4, 2010, and ended January 4, 2011. In response to requests to extend the review period, on November 18, 2010, the comment period was extended by an additional 32 days to February 4, 2011. Thus, the Draft EIR was circulated for a 93-day public review period, which is more than double the 45-day public review period required by CEQA Guidelines Section 15105 when a Draft EIR is submitted to the State Clearinghouse for review by state agencies. In addition, a public comment meeting was held on December 13, 2010.

Consistent with CEQA requirements, public participation in the EIR preparation process also occurred during the scoping period for the EIR. In July 2007, the City filed

and circulated for a 30-day public review a Notice of Preparation for the Draft EIR to receive public input on the scope of the Draft EIR. In addition, a public scoping meeting was held on August 1, 2007. Based on public comments and an Initial Study of the potential environmental issues, the Draft EIR analyzed 15 potential impact areas.

The commenter is referred to Topical Response No. 1: EIR Process (see Section III.C, Topical Responses, of this Final EIR). The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 37-3

Bifurcation

The Metro Universal and Evolution plans are, for all intents and purposes, one single project. The principal beneficiary is Universal. The principal user is Universal. The one-time property owner is Universal. Because of the proximity of the sites and their geographic location, the impacts from the two projects will have a cumulative effect on the region. Why was bifurcation allowed? How can the City and County allow the MTA Universal and Evolution plans to be assessed separately without any serious consideration of their cumulative impact on the surrounding community? While the environmental quality-of-life impacts will be significant -- scale, visual glare, shade and shadow, air pollution, noise pollution, energy demands, and so on -- the most profound impact of the bifurcated project will be in the area of traffic. Why has the City not demanded the assessment of traffic impacts as a unified whole? What are those cumulative impacts? What provisions can be implemented to guarantee that one aspect of traffic mitigation will not be delayed or postponed predicated on delays in the progress of the other portion of the proposal?

Response to Comment No. 37-3

As noted in the Project Description of the Draft EIR, the proposed Metro Universal project at the Universal City Metro Red Line Station site was an independent development project and is not part of the proposed Project. As such, pursuant to Section 15130 of the CEQA Guidelines, in this EIR, the proposed Metro Universal project was classified as a related project and, per the CEQA Guidelines, was addressed in the analysis of cumulative impacts within each environmental issue included in Section IV, Environmental Impact Analysis, of the Draft EIR. (See page 269 of the Draft EIR.)

The commenter is referred to Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, of this Final EIR) regarding the Metro Universal project. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 37-4

Specific, Master and Comprehensive Plans

The Evolution Plan contains egregious requests for exceptions and exemptions from existing community plans. How can the City and County consider these requests, which ostensibly allow private interests to trump thoughtful planning measures that were created in collaboration with elected officials, planners, and communities?

Response to Comment No. 37-4

Section IV, Environmental Impact Analysis, of the Draft EIR analyzes the potential environmental impacts of the discretionary requests associated with the proposed Project. Section IV.A, Land Use, of the Draft EIR, discusses the land use impacts, both with relation to physical land use and land use plans, of the proposed Project, including the requested Specific Plans. As discussed in the Draft EIR, the proposed Project includes annexation of portions of the Project Site into the City of Los Angeles and detachment of portions of the Project Site from the City to unincorporated Los Angeles County.

The proposed Project includes amendments to the City and County General Plans as well as the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan and the Mulholland Scenic Parkway Specific Plan and proposes two Specific Plans: (1) the Universal Studios Specific Plan for the County portions of the Project Site; and (2) the Universal City Specific Plan for the City portions of the Project Site. The proposed Specific Plans would create new zoning regulations and establish land use standards that would replace existing zoning regulations and land use standards for the affected areas. The requested zone changes to the proposed Specific Plan zones would also establish pre-zoning, as required for the implementation of the proposed annexation/detachment actions. The Draft EIR discusses these issues in Sections IV.A.1 and IV.A.2 and explains how the proposed Project would be consistent with existing plans and policies, and impacts are concluded to be less than significant. The public has an opportunity to comment on all aspects of the Project, including the process for consideration and development of the proposed Specific Plans. The public may comment on the Draft EIR, as well as during the public hearings that the City and County will hold prior to making any decision whether to approve the Project, including the proposed Specific Plans. Thus, the proposed Specific Plans are subject to similar review processes as were the existing community plans, including review by elected officials and planning staff.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 37-5

In particular:

- **The Ventura-Cahuenga Boulevard Corridor Specific Plan** governs a large area immediately in the shadow of this site, and an even larger portion of the plan would be profoundly affected by traffic impacts from the Evolution proposal. The mitigations offered do not adequately address those impacts. Beyond those inadequacies, what happens after the twenty-year project scope in terms of continued mitigations for the Evolution Plan's traffic impacts on this vital transportation corridor in our community?

Response to Comment No. 37-5

As described in Section IV.B.1.5, Traffic/Access – Traffic/Circulation, Project Design Features and Mitigation Measures, of the Draft EIR and illustrated in Figure 56 of the Transportation Study, which is presented as Appendix E of the Draft EIR, the Project has proposed several traffic mitigation measures in the Ventura–Cahuenga Boulevard Corridor Specific Plan area including: regional transit service enhancements (Metro 750), physical improvements (including roadway widening, adding turn lanes, restriping, and adding left-turn signals), and Transportation System Management improvements. The proposed physical and Transportation System Management improvements would provide mitigation benefits beyond the Project's 20-year buildout. The proposed transit system improvement to Metro 750, as described in Mitigation Measure B-1 in Section IV.B.1 of the Draft EIR, is in the form of one additional articulated bus (seating capacity = 66, standing capacity = 75) that would be operated along the transit line's route including the Ventura Boulevard corridor. In addition to funding the capital cost of the bus, the Project will also pay for total operations and maintenance (O&M) costs for the new bus during peak hours (7:00 A.M. to 10:00 A.M. and 3:00 P.M. to 6:00 P.M.) for the first three years. To ensure continued operations, the Project will pay for the unsubsidized portion of these costs for an additional seven years. Farebox revenues and state/federal transit subsidies shall be credited against O&M costs for years 1 through 10. At the end of this 10-year period, the bus would be incorporated into Metro's fleet and the cost of operations would be accommodated by standard Metro funds. In addition, the Project would be required to implement all project design features and mitigation measures required as part of the Project's approvals.

As shown in Figure 86 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, the Project would not result in any unmitigated significant impacts on any of the analyzed intersections along the Ventura Boulevard and Cahuenga Boulevard corridors with the implementation of the proposed traffic mitigation measures.

Further, the proposed Project would be required to implement all of the transportation project design features and mitigation measures required as part of the Project's approvals. Once all of these transportation improvements are implemented, no further mitigation measures are required. Further, the Project's transportation improvements would be implemented in tandem with the Project's traffic impacts in accordance with the Project's transportation mitigation sub-phasing plan. Linking Project development with the identified transportation improvements in this manner ensures that the Project's transportation impacts would be mitigated even in the event that full buildout of the proposed Project does not occur.

Comment No. 37-6

> In addition, the DEIR proposes a sign district 2C (Universal City Southern Entry Point Sign) within the Universal City Specific Plan. Does the proposed sign district in area 2C in the proposed city specific plan conform to the preexisting signage standards established by the Ventura/Cahuenga Boulevard Corridor Specific Plan for this location? If not, will an exception be requested? Why is such a request not mentioned in the DEIR?

Response to Comment No. 37-6

Potential impacts related to the proposed Project signage are discussed in the relevant sections of the Draft EIR (e.g., Section IV.D, Visual Qualities; Section IV.E.2, Light and Glare – Artificial Light; etc.). The proposed Universal City Specific Plan Southern Entry Point Sign (Sign District 2C) will no longer be included in the proposed Universal City Specific Plan. The Project does not propose modifications to the Ventura–Cahuenga Boulevard Corridor Specific Plan.

Comment No. 37-7

- An especially scenic portion of the **Mulholland Scenic Parkway Specific Plan** overlooks this site. Residents who live within the plan's scope are expected to abide by the rules of the plan. The proposal requests that the comer of Cahuenga East/Buddy Holly Drive and Barham Boulevard be removed from the Mulholland Plan. Staff and consultants employed by the applicant have stated Universal's intention to replace the existing billboard with a thirty-foot tall digital electronic billboard. We firmly believe this will have extremely disruptive repercussions on the lives of the residents of our neighborhood who will have to endure the glare from the proposed signage. What benefit does an exception to the Mulholland Plan provide for the people of our community? Isn't such a sign in violation of the scenic corridor designation of Barham Boulevard?

Response to Comment No. 37-7

Section II, Project Description, of the Draft EIR (page 348) explains that a small portion (i.e., less than 2 acres) of the Project Site is currently located within the Outer Corridor of the City's Mulholland Scenic Parkway Specific Plan. As one of the requested entitlement actions, the Project proposes revising the boundaries of the Mulholland Scenic Parkway Specific Plan to remove the small portion of the southeastern-most tip of the Project Site that is currently located within the Outer Corridor of the City's Mulholland Scenic Parkway Specific Plan. The area that is the subject of this request totals less than two acres (or approximately 0.5 percent of the 391-acre Project Site) and is proposed to be included within the proposed Universal City Specific Plan area in order to create unified and coherent regulations for all portions of the Project Site to be located within the City.

For informational purposes, the Mulholland Scenic Parkway Specific Plan area is divided into two areas—the Inner and Outer Corridors. The boundaries of these corridors are determined via distance from the Mulholland Scenic Parkway right-of-way, with the outermost boundary of the Outer Corridor extending 0.5 mile outward from the Mulholland Drive right-of-way. Mulholland Drive reaches its eastern terminus in the Project area where it turns from a primarily east-west road to a north-south road as it connects with Cahuenga Boulevard. Based on these conditions, the strict application of the Outer Corridor boundary places the eight-lane Hollywood Freeway and areas on the north (far) side of the Freeway within the boundaries of the Mulholland Scenic Parkway Specific Plan (see Figure 28 on page 433 in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR). As concluded on page 525 in Section, IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, since the context of the Project Site is dominated by the Hollywood Freeway and is not contiguous with other areas within the Mulholland Scenic Parkway Specific Plan Outer Corridor, land use impacts with respect to the intention of the Mulholland Scenic Parkway Specific Plan to preserve the visual quality of natural open space would be less than significant. The analysis goes on to further conclude that the proposed Project would not be inconsistent with existing Mulholland Scenic Parkway Specific Plan policies to preserve the existing residential character of areas along and adjoining the Mulholland Drive right-of-way, to protect all identified archaeological and paleontological resources, and to assure that land uses are compatible with the parkway environment. Therefore, the impact of the Project with respect to the Mulholland Scenic Parkway Specific Plan policies and regulations for the Outer Corridor are concluded in the Draft EIR to be less than significant.

Additionally, the proposed Project development would not be located on or proximal to any designated Prominent Ridge as identified and defined in the adopted Mulholland Scenic Parkway Specific Plan on maps 1B through 6B. As discussed on page 1087 in Section IV.D, Visual Qualities, of the Draft EIR, the primary view resources available from the Mulholland Ridge geographic area are panoramic views of the San Fernando Valley

and Verdugo Mountains in the background. Since the Project would not result in the substantial view coverage of a prominent resource, Project impacts from the Mulholland Ridge geographic area would be less than significant.

The comment also addresses the proposed modifications to the existing sign located near the intersection of Barham Boulevard and Buddy Holly Drive (the "Barham Sign"). As noted in the comment, there is an existing sign at this location that is approximately 1,000 square feet in sign area and 20 feet in height from grade. The area of the Barham Sign is included within the proposed City Specific Plan. Pursuant to the proposed City Specific Plan, the existing sign could be modified to be an animated, banner, billboard, electronic message, mounted pole, or pillar sign, 1,000 square feet of sign area at a maximum height of 30 feet above grade. The proposed City Specific Plan would include limitations on light from Electronic Message signs. As discussed in Section IV.E.2, Light and Glare – Artificial Light, pages 1260–1277 of the Draft EIR, the Draft EIR analyzed the potential impact of artificial light from the Project, including from signage, and concluded that impacts would be less than significant due to regulations in the proposed City and County Specific Plans.

As discussed on pages 1086–1087 of Section IV.D, Visual Qualities, of the Draft EIR, with regard to visual character, from the Mulholland Ridge area (i.e., the portion of the Cahuenga Pass East area north of Mulholland Drive), the Project Site blends into the larger urban landscape. As such, no substantial changes to contrast would occur from this area, as new structures and the placement of signage would blend in with existing development on the Project Site. Similarly, substantial changes to prominence would not be anticipated, since this area would continue to look down on the Project Site. While some Project structures or signs may be slightly more visible from this area and, subsequently, cover more of the available viewshed, there would not be any substantial changes to prominence as viewed from the Mulholland Ridge area. In addition, because of the wide field of view available from this location over and across the Project Site, no substantial changes in coverage would occur with development of the proposed Project. For these reasons, impacts to visual character from the Mulholland Ridge area would be less than significant.

Comment No. 37-8

- **The Los Angeles River Improvement Overlay District** and the **LA River Revitalization Master Plan** affect the riverfront edge of the project site. The Evolution Plan flouts these documents and proposes to cut off the riverfront from the citizenry. It proposes breaking the linkages and destroying the continuity of the River's 32 mile flow in the City of Los Angeles. Why was a viable option that preserved the River Plan not part of the alternatives? Why should private interests prevail over the public good?

Response to Comment No. 37-8

As explained on pages 418–419 in Section IV.A.1, Land Use – Land Use Plans/ Zoning of the Draft EIR, the northeastern portion of the Project Site that abuts the Los Angeles River Flood Control Channel is within the jurisdiction of the City of Los Angeles. The remaining approximately three-fourths of the northern edge of the Project Site is adjacent to River Road, a two-lane roadway that runs along the Los Angeles River Flood Control Channel. The majority of this northern edge is in the County jurisdiction and the majority of the River Road roadway is owned by the Los Angeles County Flood Control District.

As stated in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, the County completed the Los Angeles River Master Plan in 1996 and reissued it in 2005. The Project Site is located in Reaches 4 and 5 of the Los Angeles River Master Plan. Improvements identified in the Plan include tree plantings, a trail adjacent to the Los Angeles River Flood Control Channel and a pedestrian/bicycle path connection to Universal CityWalk. The Project does not preclude public access to the Los Angeles River Flood Control Channel. As stated in the Draft EIR, the Applicant will cooperate with the County, City, and other agencies, as necessary, to accommodate the future use of the County land for public use as contemplated by the County River Master Plan, and to continue use, if allowed by the County, of a portion of River Road for studio access.

Further, in the northeastern portion of the Project Site that is within the City's jurisdiction and owned by the Applicant, the Project proposes a River Trailhead Park that would provide access to the Los Angeles River Flood Control Channel area, and connect the existing bike path along Forest Lawn Drive and the proposed bike path along the proposed North-South Road. If the County implements a public trail on the County owned portion of the Los Angeles River Flood Control Channel frontage, that path could be connected to the proposed River Trailhead Park and the internal bike path along the North-South Road. As explained in more detail on pages 496–497 and 523–524 of the Draft EIR, with these and other project design features, the Project furthers the goals and objectives of and would not be inconsistent with the County of Los Angeles River Master Plan and the City of Los Angeles River Revitalization Master Plan.

The proposed River Improvement Overlay (RIO) district is a proposed special use district that would implement the City River Revitalization Master Plan, establishing guidelines for private property and public rights-of-way. (Draft EIR, Section IV.A.1, Land Use – Land Use Plans/Zoning, page 431.) The current draft of the proposed RIO, released in February 2012, would require the screening of loading areas, off-street parking facilities, mechanical equipment and utility infrastructure, and exterior trash enclosures and the use of indigenous native trees, plants, and shrubs. The proposed City Specific Plan requires

the screening of all rooftop equipment (with the exception of Communications Facilities) and all outdoor storage areas (with the exception of Sets/Façades and Production Activities) from the view of pedestrian public locations within 500 feet of the combined boundaries of the City and County Specific Plans. (Proposed City Specific Plan, Sections 4.1.B.5 and 4.1.B.6; attached as Appendix A-1 to the Draft EIR). In addition, the proposed Universal City Design Guidelines provide that loading facilities (and outdoor refuse storage and dumpsters) should be visually screened and secured. (Proposed City Specific Plan, Appendix 2, Guideline SE13.) The proposed Universal City Design Guidelines also provide that drought-tolerant plants, including natives, should be used in the Mixed-Use Universal City District where possible. (Proposed Universal City Design Guidelines, Guideline L2.) Among other things, the proposed RIO would also require the provision of pedestrian access to the River. Under the proposed Project, the proposed River Trailhead Park would be developed along the Los Angeles River Flood Control Channel in this City area and would provide access to the River.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 37-9

- **The Santa Monica Mountains Comprehensive Plan** would be impacted by the proposal. All the construction proposed by the Evolution proposal would serve to further squelch native wildlife on the Universal site. It would wipe out remaining wildlife populations and eliminate remaining wildlife corridors. How can we allow our environment to be degraded and disregarded in this way?

Response to Comment No. 37-9

As noted in Section 3.1.2 in the Biological Site Assessment, which is presented as Appendix K-1 of the Draft EIR, and Section IV.I, Biota, of the Draft EIR, the Project Site has been extensively developed during the past 90 years, with only small pockets of undeveloped areas remaining, as depicted on Figure 2 of the Biological Site Assessment. The Project Site is surrounded by development, isolating the Project Site from large blocks of native habitat/open space. Within the Project Site, areas of remaining habitat occur as fragments embedded within areas that have been developed for decades, resulting in very low biological functions. Wildlife species occurring on the Project Site are generally those that have adapted to, and are tolerant of, human activities and are common in urban areas. In the post-Project condition, it is expected that all of these species would continue to persist on the Project Site. Most of these species do not have any protected or special status, and, therefore, given the highly fragmented character of the site, impacts to these species would not be considered significant, pursuant to CEQA. With regard to wildlife movement, as indicated on page 1590 of the Draft EIR and in the Biological Site

Assessment, "[a]lthough limited wildlife movement may occur between the Project Site and areas to the east, movement of terrestrial animals is unlikely to areas north, south, and west of the Project Site." Therefore, the Project Site does not act as a true wildlife corridor, movement pathway, or linkage between larger habitat areas for terrestrial wildlife. Thus, although the Project would result in a loss of some of the relatively natural woodland, scrub and grassland habitats on-site, the Draft EIR concludes that this would not result in a significant impact to wildlife migration or movement. (See page 1590 in Section IV.I, Biota, of the Draft EIR.)

Comment No. 37-10

- The Evolution Plan would like multiple exceptions and exemptions from the **City of Los Angeles Sign Code Revisions**. This is NOT Times Square West as has often been suggested by the applicant. The environs of this site are not the same as those surrounding Staples Center or even Hollywood Boulevard, and they should not be treated in the same way. Why should exceptions and exemptions be considered for this site? Haven't such exceptions already proven problematic for the City's attempts to regulate outdoor advertising and signage?

Response to Comment No. 37-10

The Project includes two proposed Specific Plans: (1) the Universal Studios Specific Plan; and (2) the Universal City Specific Plan. The proposed Specific Plans would create new zoning regulations and establish land use and signage standards that would replace existing zoning regulations and land use standards for the affected areas and provide unified and coherent regulations for the County and City portions of the Project Site, respectively. To clarify, the Los Angeles Municipal Code does not apply to the portions of the Project Site within the County's jurisdiction, which are subject to the County Code. The proposed County Specific Plan would provide sign regulations for the portion of the site within County jurisdiction.

Potential impacts related to signage are discussed in multiple sections of the Draft EIR, specifically, Section IV.A.1, Land Use – Land Use Plans/Zoning; Section IV.A.2, Land Use – Physical Land Use; Section IV.D, Visual Qualities; and Section IV.E.2, Light and Glare – Artificial Light. Each of the analyses cited above concludes that Project impacts with regard to signage would be less than significant. In addition, one of the basic objectives established for the Project (see Section II, Project Description, of the Draft EIR) is to enhance the identity of the Project Site as an entertainment and media-oriented commercial district. Contributing to the achievement of this objective is the creation of an architecturally distinct development that includes a creative signage program integral to the on-site entertainment and media uses which also enhances the visual profile of the Project Site as a dynamic and visually prominent entertainment and media center, as well as

provides a dynamic visual gateway for the visitor experience. The commenter is referred to the sections of the Draft EIR cited above for the detailed analyses supporting each conclusion of a less than significant impact.

See also Response to Comment No. 37-4 regarding the proposed Specific Plans and Response to Comment No. 37-7 regarding signage in relation to the Mulholland Scenic Parkway Specific Plan.

Comment No. 37-11

20-year Development Agreement and "Thresholds"

It is our belief that the definitions of the thresholds delineating the various development phases are too vague and favor the applicant over the affected surrounding community. Hillside neighborhood protection measures and improvements are woefully inadequate and virtually nonexistent. What detailed measures and indicators can be defined for these thresholds throughout the twenty-year development that sets specific conditions that must be met before subsequent phases of development are initiated? What can the surrounding communities expect in the way of substantive neighborhood protection programs?

Response to Comment No. 37-11

As stated in Section II, Project Description, of the Draft EIR, the timing of actual Project development would be in response to market conditions. The timing of the mitigation measures are either set forth in the mitigation measures themselves or through the Project's Mitigation Monitoring and Reporting Program. With regard to traffic mitigation phasing, under the traffic mitigation sub-phasing plan, the Project has been preliminarily divided into four development phases with traffic mitigations tied to each phase. The timing and sequencing of each of the proposed developments in the sub-phases are approximate. The primary focus of this sub-phasing plan analysis is to provide a plan that requires the implementation of transportation improvements in tandem with the traffic impacts of the development. As noted in Section IV.B.1.5.n, Traffic/Access – Traffic/Circulation, of the Draft EIR on pages 687–689 and Chapter V of the Transportation Study, the Project's transportation mitigation sub-phasing plan has been developed using trips as thresholds. The trip generation of development of each phase would be monitored by the City of Los Angeles Department of Transportation. As noted in Table 28 in Chapter V of the Transportation Study, "[p]rior to the issuance of any building permit for each sub-phase, all on- and off-site mitigation measures for the sub-phase shall be complete or suitably guaranteed to the satisfaction of LADOT."

Additionally, as noted in the City of Los Angeles Department of Transportation's Assessment Letter dated April 2, 2010, and included in the Draft EIR (see Appendix E-2 of the Draft EIR), the Project would be required to comply with the trip estimates and

Transportation Demand Management credits noted in the Draft EIR. The Project's Transportation Demand Management program would be required to include:

> "a periodic trip monitoring and reporting program that sets trip-reduction milestones and a monitoring program to ensure effective participation and compliance with the TDM goals; non-compliance to the trip-reduction goals would lead to financial penalties or may require the implementation of physical transportation improvements."

With regard to neighborhood intrusion traffic impacts, refer to Topical Response No. 7: Neighborhood Intrusion (see Section III.C, Topical Responses, of this Final EIR) for additional details.

With regard to neighborhood protection during construction, as provided in Mitigation Measure B-41, the Applicant or its successor shall prepare construction traffic management plans which shall, among other elements, provide, as appropriate, that construction-related vehicles shall not park on any residential streets. Please refer to Section IV.B.1, Traffic/Access – Traffic/Circulation for further information regarding the construction traffic management plans.

Comment No. 37-12

Transportation Hub Access

If the developer wanted to truly facilitate ease of access to the transportation hub for those residents who will reside in the proposed housing element, the inclusion of a riverfront walkway, especially a moving walkway, would have been a much more efficient, attractive and environmentally sound solution. Why was that not considered?

Response to Comment No. 37-12

The commenter is referred to Response to Comment No. 37-8 regarding a pedestrian connection along the Los Angeles River Flood Control Channel, as well as connection of the existing bike path along Forest Lawn Drive and the proposed bike path along the proposed North-South Road. In addition, to provide enhanced transit service for Project residents, visitors, employees, and the surrounding community, focusing on providing connections to key destinations, such as the Universal City Metro Red Line Station, the Draft EIR includes Mitigation Measure B-2, by which the Applicant or its Successor shall provide a local shuttle system. The shuttle system would provide transport through the Project Site that would connect to the Universal City Metro Red Line Station and other publicly accessible parts of the Project Site (e.g., Universal CityWalk). The shuttle system is proposed to provide approximately 15-minute headways during the morning and afternoon peak hours and 30-minute headways during the off-peak hours.

The shuttle system would also provide connections from the Project Site to the Downtown Burbank Metrolink Station, Burbank Media District, and parts of Hollywood and West Hollywood. The commenter is also referred to Topical Response No. 5: Transit Mitigation (see Section III.C, Topical Responses, of this Final EIR) regarding the proposed shuttle system.

Comment No. 37-13

Land Use

As stated in our introductory paragraph, many of our members work in the entertainment business or in related fields. As such, there is a predisposition to support entertainment-related development projects. In general, we tend to have few issues with the studio or the theme park–related aspects of the Evolution Plan, but we do take issue with the residential component. We feel that the loss of the back lot is detrimental to this proposal and the economy of the region. We feel that it's a foolhardy trade-off for the region, especially at a time when production is leaving the area at break-neck speeds, depriving Angelinos of their skilled livelihoods. We feel that the conversion of Universal's historic back lot to housing represents an unrecoverable loss to the entertainment and tourist industries in this region. Not only that, but the need for support production facilities has repeatedly been cited as the justification for the Metro Universal proposal across Lankershim. If Universal truly needs that space and wanted to fully exploit their property, wouldn't it be more sensible and efficient to locate those production offices, post production and ancillary uses on their own campus? The appropriate place for housing is immediately adjacent to the MTA transit hub, not off Barham Boulevard, as outlined in the DEIR as Alternative Two. The MTA property is a much more appropriate location for the residences plus it satisfies the MTA's own mandate for housing. Why not put the housing where it belongs, i.e., by the MTA station, and the studio and entertainment components where they rightly belong, i.e., on the Universal Studios lot?

Response to Comment No. 37-13

The proposed Metro Universal project at the Universal City Metro Red Line Station site (referred to in the comment as the MTA property) was an individual development project and is not part of the proposed Project. Please also refer to Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, of this Final EIR), regarding the Metro Universal project.

The possibility of locating residential development on the west side of the Project Site along Lankershim Boulevard was considered as a potential alternative to the proposed Project. As concluded on pages 2158–2159 in Section V, Alternatives to the Proposed Project, of the Draft EIR, the substantial impacts associated with this alternative outweigh

the benefits associated with creating a transit-oriented residential development on the west side of the Project Site. Specifically, this potential alternative would create a new significant impact with regard to land use compatibility while also worsening the Project's significant impacts. In addition, this alternative fails to meet a number of the basic objectives of the Project. For these reasons, both individually and collectively, an alternative calling for residential development along Lankershim Boulevard was concluded to be infeasible.

The provision of the shuttle system, pursuant to Mitigation Measure B-2, is intended to directly link the Project's residential development to the Universal City Metro Red Line Station. Specifically, the shuttle would travel along the proposed North-South Road with stops at four to five locations and then via Universal Hollywood Drive to the Universal City Metro Red Line Station, with additional stops adjacent to the Theme Park and Universal CityWalk. Additionally, the easterly location of the residential portion of the Project puts the residents closer to the many entertainment-related jobs in the Burbank Media District and in Hollywood, which would also be linked by shuttle.

The comment expresses concerns about a perceived loss of jobs from the Back Lot area of the site where the Project's Mixed-Use Residential Area is proposed. As noted in the Draft EIR's Project Description, among the Project's objectives are to: (1) expand entertainment industry and complimentary uses of the Project Site; and (2) maintain and enhance the site's role in the entertainment industry. (See Section II, Project Description, of the Draft EIR, pages 275–276.) More specifically, the proposed Project includes a development strategy which would expand and contribute to the existing on-site motion picture, television production and entertainment facilities while introducing new complementary uses. The Project would continue the Project Site's important role in the entertainment industry by providing for studio, studio office and office uses on the Project Site to meet the growing and changing needs of the industry. Furthermore, the Project seeks to maintain and enhance the existing studio and entertainment-related facilities at the Project Site in order for the Project Site to continue its critical role in the evolving entertainment industry. (See Section II, Project Description, of the Draft EIR, pages 275–276.)

Accordingly, the Project includes a net increase of 307,949 square feet of studio facility floor area, resulting in a new total of 1,536,069 square feet, a net increase of 437,326 square feet of studio-related office space, for a new total of 1,379,871 square feet, and a net increase of 495,406 square feet of other supportive office space, for a new total of 958,836 square feet (Draft EIR, Table 2 on page 280). Therefore, although under the proposed Project, substantial portions of the Back Lot Area would become the Mixed-Use Residential Area, there would not be a net loss of film and television production and support facilities. Rather, the Project would result in a net increase of 1,240,681 square

feet of studio-related floor area, for a new total of 3,874,776 square feet. The Draft EIR includes estimates that the Project's net new floor area for film and television production, studio-office and other related office floor area would generate a net increase of 3,415 full-time and part-time jobs (Draft EIR, Table 186, page 2044, and Draft EIR Appendix P).

With regard to the portion of the comment regarding the residential component of the Project, a new alternative has been included in the Final EIR that deletes the residential portion of the proposed Project while increasing the Studio Office, Entertainment, and Hotel uses of the proposed Project. This alternative, Alternative 10: No Residential Alternative, is included in Section II of this Final EIR. Please refer to the analysis of Alternative 10 in Section II for further information.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 37-14

The NBC Universal Evolution Plan DEIR alludes to a number of short-term construction jobs and part-time and/or temporary service jobs that will be created as part of the project. These individuals seem unlikely to occupy any of the proposed housing either because they will be commuting from their existing residences during construction or because they will likely be unable to afford to live in the proposed development. If the proposed residences were at least geared to a portion of the market that was low to middle income, a case could be made that this was a reasonable response to a genuine need for housing in Los Angeles. Instead, the proposed target market for the housing is middle to upper income buyers, with the applicant seeking to make the open-ended entitlements as attractive as possible to potential developers, clearly seeking to realize maximum financial gain. To compound matters, this comes at a time when existing middle income geared units in the immediate area are sitting unsold, further proving the inappropriateness of this approach.

Response to Comment No. 37-14

The pricing of new residential units included in the Mixed-Use Residential Area would depend on market conditions at the time those units are available for rent and purchase. As noted in the Draft EIR, the Project would provide jobs with a range of salaries and housing with a range of prices to meet the needs of those in the area. (Draft EIR, Table 191, page 2068.) Although the Project's specific unit pricing has not been established at this time, the Applicant is considering providing a range of housing opportunities, including work force housing, which is defined for purposes of the Draft EIR as rentals at 200 percent of area median income. (Draft EIR, Table 191, page 2069.)

Furthermore, according to the City's 2006–2014 Housing Element, the City is projected to need to add 112,876 new units by 2014, or an average of approximately 13,000 units per year over the 2006–2014 period. In comparison, based on residential building and demolition permits issued in the City for the 2009 calendar year, the City experienced a net gain of 1,177 residential dwelling units (comprised of a net gain of 1,228 multi-family units and a net loss of 51 single-family units), an amount that is approximately 9.4 percent of the average annual total required to meet the Regional Housing Needs Assessment forecast.[44] As such, the additional housing units added by the Project would help meet the City's Housing Element and Regional Housing Needs Assessment housing forecast goals and would thus not have an adverse impact with regard to this issue. State law requires Southern California Association of Governments to determine the existing and projected housing need for its region. The Regional Housing Needs Assessment is a tool for Southern California Association of Governments and its member governments to plan for anticipated population and household growth. (See pages 2057–2058 in Section IV.N.2, Employment, Housing and Population – Housing, of the Draft EIR.) As explained in the Draft EIR, the Regional Housing Needs Assessment considers household growth, vacancy need, and replacement need.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 37-15

Beyond the housing jobs imbalance created by the proposed project, the decision to locate the residential component such a great distance from the existing MTA Universal City Station is also fraught with problems for local transportation infrastructure. Residents of this proposed housing will undoubtedly have personal vehicles. The impetus to have those cars would be diminished were the housing to be more appropriately located down the hill in genuine proximity to the MTA station. These personal cars will add to pollution, traffic and other overloads in an already congested area. Additionally, it seems unlikely that most of them would add 15 or 20 minutes to their commute to take a shuttle to the Universal City Station as proposed in the DEIR. To take optimal advantage of the proximity to the MTA bus and subway station on Lankershim, these units should most logically be located on the MTA site, not miles away from it. The current location requires the proposed vehicular shuttles/jitneys or long hikes over and around to the MTA station. What efforts will be made

---

[44] *Los Angeles City Planning Department, City of Los Angeles Housing Element 2006–2014, August 13, 2008, p. 14, and Los Angeles Department of City Planning, Demographic Research Unit, Statistical Information, Building Permit Summaries, http://cityplanning.lacity.org/dru/HomeBldg.cfm, accessed December 1, 2010.*

to address this jobs:housing mismatch? Will portions of the development be constructed for individuals and families of various means? Will the new proposed housing be constructed in such a way as to support the housing needs of various members of the community including middle and low-income families and individuals? What efforts will be made to assist employees with finding housing in the proposed development and surrounding area in order to reduce traffic? Why were residential units proposed at such an ill-suited location? If the developer wants to truly facilitate ease of access for those residents to the transportation hub, the inclusion of a riverfront walkway, especially a moving walkway, would have been a much more efficient, attractive and environmentally sound solution. Why was that not considered?

Response to Comment No. 37-15

By adding new jobs and new housing, the Project would have a neutral numerical impact on what is projected to be an improving subregional balance between housing and jobs. The City of Los Angeles Subregion is currently considered by Southern California Association of Governments to be "jobs rich/housing poor." This is because the ratio between its current number of jobs and households (1.38) exceeds the comparable ratio for the region as a whole (1.34), which is considered to be "balanced" overall. By 2030, with development of proportionally more housing than jobs, the City of Los Angeles Subregion is projected to be somewhat more "housing rich" than the region. While the Project would add jobs at a rate that exceeds the subregional average, the additional jobs are not of a sufficient magnitude to alter the forecasted subregional jobs/housing ratio. (Draft EIR, Table 191, page 2070.)

The issues raised in this comment related to the location of the proposed residential uses are substantively the same as those raised earlier in this letter. As such, the commenter is referred to Response to Comment Nos. 37-12, 37-13, and 37-14. Additional details regarding the on-site shuttle system are provided below.

As described in Mitigation Measure B-2 in Section IV.B.1, Traffic/Access – Traffic/ Circulation, on pages 666–667 of the Draft EIR, three shuttle routes are proposed as part of the shuttle system, including:

- Shuttle from Lakeside Plaza Drive Transit Center to Universal City Metro Red Line Station—This shuttle shall primarily provide the residents in Mixed-Use Residential Area with a connection to the Universal City Metro Red Line Station with stops adjacent to the Theme Park and CityWalk. The shuttle would travel along the North-South Road with stops at four to five locations and then via Universal Hollywood Drive to the Universal City Metro Red Line Station.

- Shuttle from Lakeside Plaza Drive Transit Center to Downtown Burbank Metrolink Station/Burbank Media District—This shuttle would provide a

connection from the Project Site to the Downtown Burbank Metrolink Station and the Burbank Media District.

- Shuttle from Lakeside Plaza Drive Transit Center to Hollywood/West Hollywood—This shuttle would provide a connection from the Project Site to West Hollywood and parts of Hollywood west of Highland Avenue that are farther away from the Hollywood/Highland Metro Red Line Station.

Additionally, the proposed Project includes a Transportation Demand Management Program to encourage use of transit by project users, as well as other traffic-reducing measures.

The commenter is referred to Topical Response No. 4: Transportation Demand Management Program and Topical Response No. 5: Transit Mitigation (see Section III.C, Topical Responses, of this Final EIR) for additional details regarding the Transportation Demand Management Program and the proposed shuttle system.

With regard to a riverfront walkway, please refer to Response to Comment No. 37-8, above.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 37-16

Scale of Project

2,937 town homes, condos or apartments are proposed for the portion of the current back lot to be annexed to the City of Los Angeles, yet no square footage allowances have been stipulated. As stated elsewhere in this letter, this is a suburban neighborhood, not a neighborhood of urban high rises. This portion of the site is adjacent to the single-family residences of the Hollywood Manor neighborhood. Why is the scale of the real estate development not in conformity with the existing scale and character of the surrounding neighborhoods?

Response to Comment No. 37-16

The comment notes that no square footage is specified for the proposed residential uses. Residential development, in the City as well as the County, is regulated in the respective General Plans and Zoning Ordinances in terms of residential density (i.e., the number of residential units per land area, typically per acre of land). Density is used to regulate residential uses because impacts from residential land uses are primarily determined by the number of residential units which translates to population which is the main measure for assessing impacts from residential uses. For example, 10,000 square

feet of residential units could equate to 4 residential units (i.e., based on an average of 2,500 sq.ft.) or 20 residential units (i.e., based on an average of 500 sq.ft.). As such, for the same amount of residential floor area, five times the number of residential units could be generated.

With regard to the use of the term "urban," the U.S. Census Bureau defines an urban area as: "Core census block groups or blocks that have a population density of at least 1,000 people per square mile (386 per square kilometer) and surrounding census blocks that have an overall density of at least 500 people per square mile (193 per square kilometer)."[45] The Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan area had a population density of approximately 5,372 persons per square mile during the 2000 census, with an estimated density of approximately 5,855 persons per square mile in 2009.[46] The North Hollywood–Valley Village Community Plan area had a population density of approximately 12,783 persons per square mile during the 2000 census, with an estimated density of approximately 13,885 persons per square mile in 2009.[47] The Van Nuys–North Sherman Oaks Community Plan area had a population density of approximately 12,307 persons per square mile during the 2000 census, with an estimated density of approximately 12,891 persons per square mile in 2009.[48] Further, the individual census tracts within the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan area that are closest to the Project Site have population density levels that range from 2,674 to 14,089 persons per square mile.[49] The density in the Project area well exceeds the population density used by the U.S. Census Bureau to define urban areas. For this reason, the term "urban" was used throughout the EIR as it refers to the Project area.

With regard to potential impacts to surrounding neighborhoods as discussed on pages 570–576 in Section IV.A.2, Land Use – Physical Land Use, of the Draft EIR, while the Project Site may present an increase in density and intensity of land use as compared to that which currently exists in the eastern portion of the Project Site, given physical

---

[45] *Census 2000 Urban and Rural Classification, U.S. Census Bureau, Geography Division, www.census.gov/geo/www/ua/ua_2k.html, Created: April 30, 2002, Last revised: December 03, 2009.*

[46] *Los Angeles Department of City Planning, Demographic Research Unit, City of Los Angeles, Local Population and Housing Profile, Sherman Oaks–Studio Cy Community Plan Area, May 2011.*

[47] *Los Angeles Department of City Planning, Demographic Research Unit, City of Los Angeles, Local Population and Housing Profile, N Hollywood–Valley Vlg Community Plan Area, May 2011.*

[48] *Los Angeles Department of City Planning, Demographic Research Unit, City of Los Angeles, Local Population and Housing Profile, Van Nuys Community Plan Area, May 2011.*

[49] *Los Angeles Department of City Planning, Demographic Research Unit, City of Los Angeles, Local Population and Housing Profile, Van Nuys Community Plan Area, May 2012.*

separations, the proposed open space and the design standards and regulations of the proposed City and County Specific Plans, the proposed Project would not substantially or adversely change the existing land use relationship between the Project Site and the Hollywood Manor, Oakwood Garden Apartments, and the Hollywood Knolls areas and would not disrupt, divide, or isolate these surrounding neighborhoods. As such, the Draft EIR concludes that the Project would result in a less than significant physical land use impact.

Comment No. 37-17

Jobs

The City, County and State have gone on record regarding the fiscal hardships created by "runaway production." Once the homes have been built, the opportunity for this back lot will be forever lost, as will any possible production uses. If this large, easily accessible historic studio back lot is sold off and replaced by housing, how will that benefit the residents of Los Angeles whose livelihood and quality of life are compromised by production leaving the city?

Response to Comment No. 37-17

The issues raised in this comment are similar to those raised earlier in this letter. The commenter is referred to Response to Comment No. 37-13. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 37-18

Traffic

The Traffic section of the DEIR is flawed and filled with inaccuracies. It fails to recognize the unique nature of the transportation network of our community. Streets are omitted and neighborhoods are left out. There is a glaring lack of accuracy in the Level of Service ratings time and time again. For instance, there is no distinction made between Cahuenga West or Cahuenga East or the portion of Cahuenga Boulevard that extends north off Lankershim Boulevard; three major thoroughfares in the area. How can the DEIR be considered valid if there has been no distinction made between these streets? Unsupported assumptions are made resulting in unsupportable conclusions. Things are dismissed cavalierly reflecting a genuine lack of understanding of how the neighborhoods surrounding Universal function. Even with these flaws, the results are still "significant and unmitigatible." How can the City and County accept the findings in this DEIR when it does not fairly or accurately assess the current traffic conditions?

Response to Comment No. 37-18

As noted in Section IV.B.1.2.c.(1) of the Draft EIR and Chapter III of the Transportation Study, the traffic analysis for the Project is based on a detailed travel demand forecasting model ("Universal City Transportation Model") that was developed for the Study Area using the Southern California Association of Governments' Regional Transportation Plan 2004 Transportation Model and the City of Los Angeles' General Plan Framework model as the base:

> "The City's model network was modified to include the following:
>
> 1. Network detail (to add all directional ramps, collector streets in addition to the City's network of freeways, and major and minor arterials in the Study Area, and update link characteristics such as number of lanes, capacity, and speed parameters).
>
> 2. Traffic Analysis Zone system refinements to include more detail in the Study Area in order to obtain improved travel forecasts.
>
> 3. Updated network assignment features to simulate traffic patterns very close to actual traffic patterns observed in traffic counts.
>
> These model modifications were included to offer more detailed and reliable future traffic forecasts in the Study Area. Existing conditions were simulated using the model, and the results of the traffic flows were compared to existing traffic counts. The model parameters were calibrated within three percent of the existing traffic counts, in compliance with Los Angeles Department of Transportation standards. Detailed descriptions of the model development and calibration/validation processes are provided in Appendix H of the Transportation Study dated March 2010 included in Appendix E-1 of this Draft EIR."

Similar to analysis conducted with the Southern California Association of Governments' regional model, the analysis accounts for the unique nature of the street system within and around the Study Area, and the traffic conditions on both the freeway and street networks. The traffic volumes were assigned to the intersections and streets after a thorough investigation of traffic patterns and in collaboration with Los Angeles Department of Transportation and Caltrans, and consultation with other relevant jurisdictions, such as the City of Burbank and County of Los Angeles.

The Study Area was determined based on consultation with the City of Los Angeles Department of Transportation, Caltrans, the County of Los Angeles Department of Public Works, and the City of Burbank Planning Department, and by reviewing the travel patterns and the potential impacts of Project traffic. The Study Area is approximately 50 square miles in area and is generally bounded by Burbank Boulevard in the community of North

Hollywood and the City of Burbank on the north, Santa Monica Boulevard in the City of West Hollywood and the community of Hollywood on the south, Forest Lawn Drive on the east, and Sepulveda Boulevard in the community of Sherman Oaks on the west, and includes all streets and neighborhoods within the Study Area, including Cahuenga Boulevard (West), Cahuenga Boulevard (East), and Cahuenga Boulevard that extends north from Lankershim Boulevard.

Regarding the distinction between Cahuenga Boulevard (West), Cahuenga Boulevard (East), and Cahuenga Boulevard that extends north of Lankershim Boulevard, these streets have been clearly depicted in the maps presented in the Draft EIR and the Transportation Study and identified accordingly, where needed, and analyzed in the Draft EIR and the Transportation Study. Additionally, existing traffic conditions were analyzed in detail using field observations and LADOT traffic cameras. As noted in Section IV.B.1.2.b.(2)(b) of the Draft EIR and Chapter II of the Transportation Study, the Level of Service results were adjusted at intersections if any discrepancies were noted between the traffic volume calculations and field observations.

Comment No. 37-19

$100 million is proposed for traffic mitigations. $10 million of that is to go towards preparing "shovel-ready" drawings to attract supposed federal and state highway improvement funds. What guarantee is there that those funds will still be there, much less awarded once the drawings have been completed? That's potentially $10 million down the drain leaving the region to bear the brunt of Universal's added traffic with no viable recourse. What guarantees can Universal provide that the preparation of the drawings will result in the construction being implemented and completed in a timely manner? If they cannot provide those assurances, what is Universal willing to provide instead to mitigate their traffic impacts on the local freeways and beyond should funding from other sources not prove viable?

Response to Comment No. 37-19

The $100 million cost estimate of the traffic mitigation program is an engineering estimate of the implementation costs of the Project's transportation project design features and mitigation measures. It should be noted that the Project is required to implement all of the transportation project design features and mitigation measures required as part of the Project's approvals, regardless of the cost of these measures. The estimate has been developed for informational purposes only and is not mentioned in the Draft EIR or the Transportation Study, as the Project's approval is tied to the proposed improvements and not the estimated cost.

Separately, the Project has proposed to fund the environmental documents for the proposed US 101 regional improvements described in Appendix O of the Transportation Study (see Appendix E-1 of the Draft EIR). However, as noted in Appendix O, the Project's traffic impact analysis does not account for any benefits from the proposed US 101 regional improvements. Therefore, the significant impacts noted in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR and Chapters V and VI of the Transportation Study do not account for the implementation of the regional improvements. See also Topical Response No. 6: Freeway Improvements (see Section III.C, Topical Responses, of this Final EIR).

Comment No. 37-20

$45 million is proposed for the construction of a southbound 101-freeway slip ramp. Why is Universal proposing to build only HALF of an on- and off-ramp configuration? That supposedly leaves $45 million approximately split for roadway and transit improvements. Universal's traffic consultant, Pat Gibson claims that only nine (9) intersections will experience significant and unavoidable impacts. We seriously question Mr. Gibson's conclusions. How can a few new traffic lights, a turn lane here and there plus some minor street widening balance an increase of over 36,000 new daily vehicle trips?

Response to Comment No. 37-20

The proposed US 101 southbound on-ramp at Universal Studios bridge improvement is estimated at approximately $10 million, not $45 million as stated in the comment. Additionally, as noted in Response to Comment No. 37-19, the Project is required to implement all of the transportation project design features and mitigation measures required as part of the Project's approvals regardless of the cost of these measures. The estimate has been developed for informational purposes only and is not mentioned in the Draft EIR or the Transportation Study as the Project's approval is tied to the proposed improvements and not the estimated cost.

The comment also states that this proposed on-ramp represents half of an on- and off-ramp configuration. It should be noted that, as described in Mitigation Measure B-4 in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, the Project is proposing a new US 101 southbound off-ramp at Ventura Boulevard/Fruitland Drive in the vicinity of the proposed new on-ramp. In addition, two other US 101 southbound off-ramps currently exist on both sides of Universal Studios Boulevard—at Regal Place (intersection 39) and at Bennett Drive (intersection 46). The proximity of these two ramps precludes the construction of another southbound off-ramp at Universal Studios Boulevard. Given the proposed off-ramp at Ventura Boulevard/Fruitland Drive and the existing off-ramps at Regal Place and Bennett Drive, a southbound off-ramp at Universal Studios Boulevard is not needed to mitigate Project impacts.

The transportation mitigation program has been developed to mitigate the Project's incremental impact on the street system to the extent feasible. As shown in Section IV.B.1.6.a of the Draft EIR and Chapter V of the Transportation Study, the Project's proposed extensive traffic mitigation program mitigates the Project's impacts to less than significant at 88 of the 97 significantly impacted intersections. Significant and unavoidable impacts from the Project remain at only nine of the analyzed intersections.

As noted in Section IV.B.1.3.c.(1) of the Draft EIR and Chapter V of the Transportation Study, with the implementation of the Transportation Demand Management program, the Project is expected to generate approximately 28,108 daily net new trips. The commenter is referred to Topical Response No. 4: Transportation Demand Management Program (see Section III.C, Topical Responses, of this Final EIR) for further information regarding the Project's proposed Transportation Demand Management Program.

Comment No. 37-21

Universal's traffic consultants seem to lack an understanding or [sic] our area. As the name suggests, we reside in a mountain pass: a topographically constrained hillside community. While the 101 Freeway and Cahuenga Blvd. West run through the middle of the Pass, the majority of the roadways are small and narrow. Many streets are barely two lanes wide, enough to handle the traffic to accommodate residents and their needs, yet hardly suitable to sustain additional traffic. Some roads are only one lane, and considered substandard. Automobile traffic here functions like water; when it overflows it will seek alternate routes. They posit that if there is no simple, equivalent parallel route extant, that there cannot be any hardship to the surrounding communities if the first route becomes overloaded by their traffic. That is simply illogical and superficial. People in our neighborhood have become skilled at locating alternative routes, and if we can find them, so can other people. There is even a book available for purchase of cut-through streets in Los Angeles as well as several web sites. Some of our main cut-through streets include: Wrightwood Drive and Lane, Mulholland, Woodrow Wilson, Passmore, Oakshire, Fredonia, Broadlawn, Oak Glen, Ione, Bonnie Hill, Adina, Nichols Canyon, Outpost, Laurel Canyon, Bennett Drive and so on. Why should these perfunctory analyses be accepted if they fail to acknowledge the character of our community? How does Universal propose to address the impacts that new cut-through traffic will have on our community? What genuine neighborhood protection measures are proposed for when problems inevitably arise after initiation of any new project on this site? Can we expect the streets mentioned above to be thoroughly studied in the FEIR? Can we also anticipate additional mitigations for these aforementioned streets and routes? What benefits is Universal offering to the surrounding communities who will have to suffer and endure the 80% increase in traffic?

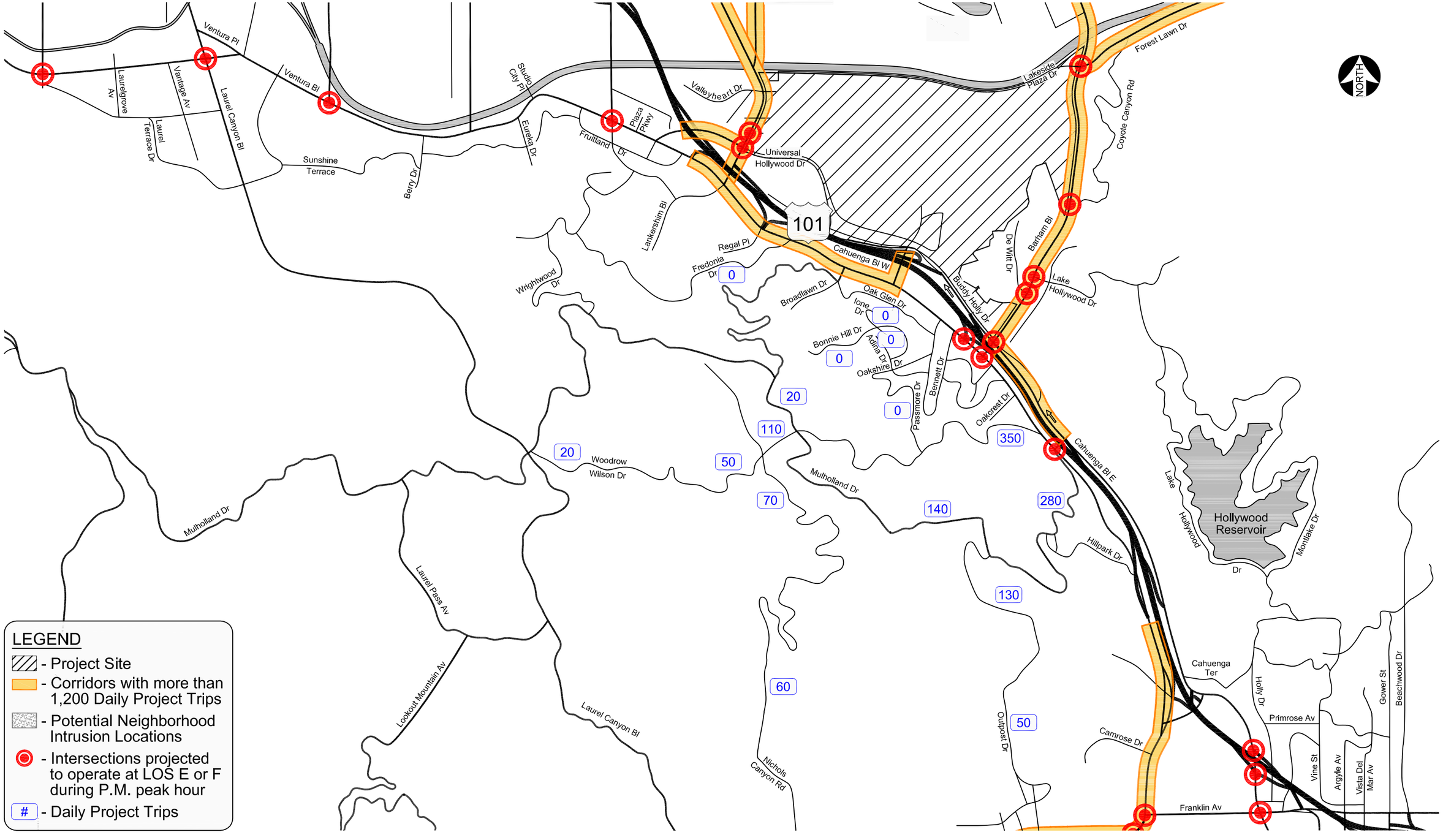
Response to Comment No. 37-21

As noted in Response to Comment No. 37-18, above, the Universal City Transportation Model, which is based on the Southern California Association of Governments regional model, accounts for the unique nature of the street system within the Study Area and included the neighborhoods referenced in the comment. The traffic volumes were assigned to the intersections and streets after a thorough investigation of existing traffic patterns and in collaboration with the City of Los Angeles Department of Transportation.

As noted in Section IV.B.1.3.b.(5) of the Draft EIR and Chapter VIII of the Transportation Study, per Los Angeles Department of Transportation's significance threshold, for any neighborhood in which traffic could be increased by 120 trips per day or more on any local residential streets, a potentially significant neighborhood intrusion impact by the Project is identified. As noted in the Draft EIR and the Transportation Study, based on City of Los Angeles Department of Transportation policy, a significant Project neighborhood intrusion impact would occur on a neighborhood street if sufficient Project traffic is projected to be added to the arterial corridors such that the volume that may shift to an alternative route could exceed the minimum significance threshold of 120 or more daily trips. The majority of vehicles on an arterial corridor tend to remain on that corridor even under congested conditions, with only a small portion of motorists inclined to seek alternative routes. Therefore, corridors to which the Project may add 1,200 or more daily trips were examined, assuming that at most only 10 percent of these trips may shift to alternative routes on average across a 24-hour period (the proportion that may shift could be higher than 10 percent during congested peak periods of the day but much less than 10 percent or almost none during uncongested non-peak periods of the day). Using the Universal City Transportation Model, the number of trips that may be added to any particular arterial corridor was projected, and the extent of the projected addition of 1,200 or more daily trips was determined. Since the model provides peak hour but not daily assignments, daily Project trips were estimated by multiplying the afternoon peak-hour Project trips by a factor of 10.

Figure 9 on page 1639 below shows the Project trips under the Future with Project with Funded Improvements scenario on the streets noted in the comment.

Wrightwood Drive and Lane—As shown in Figure 9, the Project is expected to add approximately 180 daily trips to Wrightwood Drive and Lane. However, approximately 110 of these trips dissipate into the neighborhood adjacent to the intersection of Wrightwood Drive and Dona Lisa Drive/Dona Rosa Drive while 60 of the trips dissipate just south of the intersection of Wrightwood Drive & Mulholland Drive. Therefore, these trips represent local



Source: Gibson Transportation Consulting, Inc. and Raju Associates, Inc. 2011.

matrix environmental

Figure 9
Neighborhood Intrusion Impact Analysis -
Future With Project With Funded Improvements Scenario

trips from the neighborhood instead of cut-through traffic. Hence, the Project would not have a significant impact on this street.

Mulholland Drive—As shown in Figure 9, the Project is expected to add approximately 280 daily trips to Mulholland Drive adjacent to its intersection with Cahuenga Boulevard (West). However, approximately 140 of these trips dissipate adjacent to the street's intersection with Outpost Drive while another 50 trips dissipate adjacent to its intersection with Woodrow Wilson Drive. Therefore, these trips represent local trips from the neighborhood instead of cut-through traffic. Hence the Project would not have a significant impact on this street.

Woodrow Wilson Drive—As shown in Figure 9, the Project is expected to add approximately 350 daily trips to Woodrow Wilson Drive adjacent to its intersection with Cahuenga Boulevard (West). However, approximately 240 of these trips dissipate prior to the street's intersection with Mulholland Drive while only 70 trips continue along Nichols Canyon Road to Hollywood (as through traffic). The 70 through trips are below Los Angeles Department of Transportation's 120-trip significance threshold.

Therefore, the majority of these trips represent local trips from the neighborhood instead of cut-through traffic. Hence the Project would not have a significant impact on this street.

Passmore Drive—As shown in Figure 9, the Project is not expected to add any trips to Passmore Drive. Hence the Project would not have a significant impact on this street.

Oakshire Drive—As shown in Figure 73A in Section IV.B.1 of the Draft EIR and Figure 66 of the Transportation Study, Oakshire Drive has been identified as a potentially significantly impacted street under the Future with Project scenario, before Transportation Demand Management trip reduction and mitigations. However, as shown in Figure 73B as revised in this Final EIR (see Corrections and Additions, Section II of this Final EIR), and Figures 67 and 68 of the Transportation Study, the Project's impact on this street is mitigated to a level below significance under the Future with Project with Transportation Demand Management Program and Future with Project with Funded Improvements scenarios. Hence, the Project would not have a significant impact on Oakshire Drive with the implementation of the proposed mitigation program.

Fredonia Drive—As shown in Figure 9, the Project is not expected to add any trips to Fredonia Drive. Hence the Project would not have a significant impact on this street.

Broadlawn Drive—As shown in Figure 73A in Section IV.B.1 of the Draft EIR and Figure 66 of the Transportation Study, Broadlawn Drive has been identified as a potentially significantly impacted street under the Future with Project scenario, before Transportation Demand Management trip reduction and mitigations. However, as shown in Figure 73B as

revised in this Final EIR (see Corrections and Additions, Section II of this Final EIR), and Figures 67 and 68 of the Transportation Study, the Project's impact on this street is mitigated to a level below significance under the Future with Project with Transportation Demand Management Program and Future with Project with Funded Improvements scenarios. Hence the Project would not have a significant impact on Broadlawn Drive with the implementation of the proposed mitigation program.

Oak Glen Drive—As shown in Figure 73A in Section IV.B.1 of the Draft EIR and Figure 66 of the Transportation Study, Oak Glen Drive has been identified as a potentially significantly impacted street under the Future with Project scenario, before Transportation Demand Management trip reduction and mitigations. However, as shown in Figure 73B as revised in this Final EIR (see Corrections and Additions, Section II of this Final EIR), and Figures 67 and 68 of the Transportation Study, the Project's impact on this street is mitigated to a level below significance under the Future with Project with Transportation Demand Management Program and Future with Project with Funded Improvements scenarios. Hence the Project would not have a significant impact on Oak Glen Drive with the implementation of the proposed mitigation program.

Ione Drive—As shown in Figure 9, the Project is not expected to add any trips to Ione Drive. Hence the Project would not have a significant impact on this street.

Bonnie Hill Drive—As shown in Figure 9, the Project is not expected to add any trips to Bonnie Hill Drive. Hence the Project would not have a significant impact on this street.

Adina Drive—As shown in Figure 9, the Project is not expected to add any trips to Adina Drive. Hence the Project would not have a significant impact on this street.

Nichols Canyon Road—As shown in Figure 9, the Project is expected to add approximately 70 daily trips to Nichols Canyon Road. This number of trips is lower than Los Angeles Department of Transportation's significance threshold of 120 daily trips for neighborhood impacts. Therefore, the Project would not have a significant impact on this street. Additionally, it should be noted that Nichols Canyon Road is classified as a Collector Road (per City of Los Angeles' General Plan) and not a Local Street.

Outpost Drive—As shown in Figure 9, the Project is expected to add approximately 130 daily trips to Outpost Drive adjacent. However, approximately 80 of these trips dissipate north of Hollywood Drive. Therefore, these trips represent local trips from the neighborhood instead of cut-through traffic. The remaining 50 trips are lower than Los Angeles Department of Transportation's significance threshold of 120 daily trips for neighborhood impacts. Hence the Project would not have a significant impact on this street.

Laurel Canyon Boulevard—Laurel Canyon Boulevard is classified as a Secondary Street, per the City of Los Angeles' General Plan, and not a Local Street. Therefore, the street is not required to be analyzed for neighborhood intrusion impacts.

Bennett Drive—As shown in Figure 73A in Section IV.B.1 of the Draft EIR and Figures 66 and 67 of the Transportation Study, Bennett Drive has been identified as a potentially significantly impacted street under the Future with Project and Future with Project with Transportation Demand Management Program scenarios. However, as shown in Figure 73B as revised in this Final EIR (see Corrections and Additions, Section II of this Final EIR), and Figure 68 of the Transportation Study, the Project's impact on this street is mitigated to less than significant under the Future with Project with Funded Improvements scenario. Hence the Project would not have a significant impact on Bennett Drive with the implementation of the proposed mitigation program.

As shown above, the Project is not expected to result in a significant neighborhood intrusion impact, after mitigations, at any of the streets noted in the comment. The commenter is also referred to Topical Response No. 7: Neighborhood Intrusion (see Section III.C, Topical Responses, of the Final EIR) for additional detail.

Comment No. 37-22

Universal proposes to offer jitneys, shuttles and other supposed transportation mitigations, but only for the twenty (20) year span of their project. What happens to those supposed mitigations in the twenty-first year? Is Universal absolved of any commitment or responsibility to maintain them? If they have caused the impact, why should they not be responsible for mitigating it in perpetuity?

Response to Comment No. 37-22

Physical improvements required by the Project's transportation mitigation measures would be implemented consistent with the proposed transportation mitigation sub-phasing plan. As noted in Section IV.B.1.5.n of the Draft EIR and Chapter V of the Transportation Study, similar to other development proposals in the City of Los Angeles, the Project's transportation mitigation sub-phasing plan has been developed using trips as thresholds. The Project has been preliminarily divided into four development phases with traffic mitigations tied to each sub-phase. The primary focus of this sub-phasing analysis is to provide a plan that requires the implementation of transportation improvements in tandem with the traffic impacts of the development. Table 28 of the Transportation Study and Attachment J in the City of Los Angeles Department of Transportation's Assessment Letter dated April 2, 2010 (see Appendix E-2 of the Draft EIR), summarize the proposed Transportation Improvement and Mitigation Phasing Plan. The commenter is also referred to Topical Response No. 4: Transportation Demand Management Program (see Section

III.C, Topical Responses, of this Final EIR) for further information regarding implementation of transportation mitigation.

The comment references shuttles that would be available for 20 years. It is assumed that the comment is referring to the shuttle system that would be provided pursuant to Mitigation Measure B-2. As set forth in Mitigation Measure B-2 and the City of Los Angeles Department of Transportation's Assessment Letter, dated April 2, 2010 (Appendix E-2 of the Draft EIR), the shuttle system shall be guaranteed for 20 years. After 20 years, depending on ridership, it is anticipated that the shuttle could be integrated into a public transportation system service, and the Applicant or successors would no longer be obligated to operate the shuttle. Other transportation mitigation measures, such as the new southbound on-ramp to the 101 Freeway from Universal Studios Boulevard, pursuant to Mitigation Measure B-3, would not be limited in time to 20 years.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 37-23

Allusions are made to linking trip thresholds to construction phases, yet there is no clear exposition not only of those phasing thresholds but of who monitors and audits those thresholds. Who determines those thresholds? Will the community have input regarding the designated levels of those thresholds? Who will monitor thresholds once they are established? Will the community have representation on those monitoring bodies? What mechanisms will be in place to ensure that thresholds are met before development can proceed? What guarantees does the community have that those mitigations will be sufficient to balance the newly added hardships?

Response to Comment No. 37-23

As noted in Response to Comment No. 37-11 above, the Project's mitigation sub-phasing program is tied to the Project's trip generation. The Project has been preliminarily divided into four development sub-phases with traffic mitigations tied to each sub-phase. The primary focus of this sub-phasing analysis is to provide a plan that requires the implementation of transportation improvements in tandem with the traffic impacts of the development.

The trip generation of development of each phase would be monitored by the City of Los Angeles Department of Transportation. As noted in Table 28 in Chapter V of the Transportation Study:

> "Prior to the issuance of any building permit for each sub-phase, all on- and off-site mitigation measures for the sub-phase shall be complete or suitably guaranteed to the satisfaction of LADOT."

Additionally, as noted in the City of Los Angeles Department of Transportation's Assessment Letter dated April 2, 2010 (see Appendix E-2 of the Draft EIR), the Project would be required to comply with the trip estimates and Transportation Demand Management credits noted in the Draft EIR as the Project's Transportation Demand Management program would be required to include:

> "a periodic trip monitoring and reporting program that sets trip-reduction milestones and a monitoring program to ensure effective participation and compliance with the TDM goals; non-compliance to the trip-reduction goals would lead to financial penalties or may require the implementation of physical transportation improvements"

In accordance with the Mitigation Monitoring and Reporting Program, implementation of the mitigation program and trip thresholds would be enforced and monitored by the City of Los Angeles Department of Transportation.

Comment No. 37-24

Bicycle Connectivity

Why isn't the construction of the LA River Bike Path section from Barham to Lankershim required as a condition of this project? Further, as a regional traffic mitigation, why not require Universal to pay for the construction of the LA River Bike Path portions if traffic can be lessened by having them provide trams using that bike path to shuttle people from Griffith Park to the Universal MTA Station?

Response to Comment No. 37-24

The issues raised in this comment regarding a bike path along the Los Angeles River were also raised earlier in Comment No. 37-8. The commenter is referred to Response to Comment No. 37-8. With regard to the use of a bike path along the Los Angeles River to operate trams, the comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 37-25

In prior iterations, Universal submitted plans that included an interface with the LA River Bicycle Path. Those plans incorporated the security that Universal requires for its production facilities and provided a pleasant border as seen from the LA River. Currently, Universal has not incorporated those plans and instead is offering a trailhead to a bike lane

on their proposed new north-south road. Universal executives have cited security issues after the 9/11 terrorist attacks as their reason for removing the LA River Bicycle Path from their plans. None of us want to invite a terrorist attack, however, what measures were used to determine that the elimination of the LA River Bike Path created less opportunity for a terrorist attack than those extant on the public streets on the Universal property: Universal Hollywood Drive, Universal Studio Blvd, Buddy Holly Drive and Hotel Drive? The tourist and recreational value of being able to bicycle from the Sepulveda dam to Long Beach far outweighs any possible risks created by allowing the public to utilize this resource. The suggested alternative of detouring up the north-south road would require users to climb a steep hill (340 ft gain in elevation) each way. Further, if one views the LA River access roads from either the Barham or Lankershim bridges, it is clear that constructing the LA River Bike Path would not seriously interfere with Universal's production abilities. At worst, it would require Technicolor to remove its temporary storage to accommodate the access road. Given the importance of the bike path to the community, why have the City and County not demanded that the LA River Bike Path be a mandatory component of the development proposal?

Response to Comment No. 37-25

The comment suggests that the Project eliminates a potential bike path along the Los Angeles River Flood Control Channel and, as an alternative, proposes a "detouring" bike path along the proposed North-South Road. As explained in Response to Comment No. 37-8, the majority of the land adjacent to the Los Angeles River Flood Control Channel is owned by the County, and the Project does not preclude a bike path along the Los Angeles River Flood Control Channel. The internal bike paths are not proposed as a substitute for a trail along the Los Angeles River Flood Control Channel. The commenter is referred to Response to Comment No. 37-8 for additional information with regard to this issue. As explained in more detail in Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, the Project furthers the goals and objectives of, and would not be inconsistent with, the County River Master Plan and the City River Revitalization Master Plan. (see pages 497–498 and 523–524 of the Draft EIR.) Further, as the Draft EIR concludes that Project impacts with regard to the various plans that pertain to the Los Angeles River Flood Control Channel are less than significant, mitigation measures, including those identified in the comment, are not required by CEQA. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 37-26

According to observations made during workweek rush hours, a great many of Universal Tour's trams remained in Universal's storage lot. Also, many parking places sat vacant in

Griffith Park at the same times. It seems reasonable to suggest that if a shuttle ran along the bicycle path between the MTA station and Griffith Park, many drivers who currently use the Forest Lawn Drive/Barham Blvd route would choose to park their vehicles and use the LA Metro. This system would require widening the LA River Path at specifically determined locations to allow trams to pass each other and would also require the creation of waiting areas, possibly with pleasant views of the river. Why has this not been considered?

Response to Comment No. 37-26

With regard to the use of a bike path along the Los Angeles River to operate trams, the comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. The commenter is referred to Response to Comment No. 37-8 above regarding construction of a bike path along the Los Angeles River.

Comment No. 37-27

Finally, what assurances do we have that the developer will pay the cost of traffic mitigation, as is customary?

Response to Comment No. 37-27

The Project would be required to implement all of the transportation project design features and mitigation measures required as part of the Project's approvals. The commenter is referred to Response to Comment No. 37-23, above regarding implementation of the mitigation program.

Comment No. 37-28

Environmental Issues

The requested scale of this project is huge and the environmental demands of a development of this size are equally daunting. Air quality, noise pollution and traffic are admitted as short-term impacts. Air quality, traffic and solid waste are admitted as long-term impacts. We posit that these impacts have been grossly underestimated. How can the City and County find credible that approximately five million square feet of proposed development, and the density it creates on the site, is not inappropriate and out of scale to its environs?

Response to Comment No. 37-28

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. The comment claims that the Project's impacts have not been adequately disclosed but provides no

information that substantiates this claim. The Project's potential air quality, noise, traffic, and solid waste impacts were thoroughly analyzed, as detailed in Sections IV.H, Air Quality; IV.C, Noise; IV.B.1, Traffic/Access – Traffic/Circulation; and IV.L.3, Utilities – Solid Waste, of the Draft EIR. The commenter is referred to those sections for a detailed discussion of the potential impacts and proposed project design features and mitigation measures.

Comment No. 37-29

Air Quality

As previously stated, the 6,500 new residents of the 2,937 units will undoubtedly have personal vehicles for their use. These vehicles will add to the air quality concerns for the area as will the vehicles of new employees and increased guest attendees. What considerations have been given to mitigating those added long term impacts as a result of these new emissions? Not only will the residents have personal vehicles, but the residences will also have emissions from HVAC as well as other utility consumption. What mitigations are proposed for those discharges?

Response to Comment No. 37-29

The comment addresses what consideration was given to mitigating emissions from personal vehicle use associated with the Project. Potential impacts to air quality associated with Project construction and operational emissions are analyzed in the Draft EIR, Section IV.H, Air Quality, and related technical report included as Appendix J to the Draft EIR, consistent with the SCAQMD's CEQA Handbook. As shown on pages 1468–1509, Tables 108–112, 124, 130–131, in Section IV.H, Air Quality, of the Draft EIR, the Project's air quality analysis accounts for emissions from personal vehicle use. The Project includes project design features and mitigation measures described in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR, that would reduce vehicle trips and vehicle miles traveled, which would reduce the Project's air pollution emissions. (See Draft EIR, page 1523.) For example, the Project would implement a Transportation Demand Management program that results in a decrease of daily vehicle trips, which effectively reduces traffic-related air pollutant emissions. (Draft EIR, page 619.) The Transportation Demand Management program would include several strategies. Refer to Topical Response No. 4: Transportation Demand Management Program (see Section III.C, Topical Responses, of this Final EIR) for further information.

In addition, because the Project is an infill, high-density, transit-oriented development, it would help towards achieving a number of air quality and greenhouse gas reduction goals by helping to reduce emissions from personal vehicle travel. The Project puts future residents and workers in close proximity to places of employment and services

and thus has the potential to reduce vehicle trips and vehicle miles traveled. As a transit-oriented development, the Project would have greater access to public transportation, which would also have the potential to reduce the amount of vehicle trips and miles traveled, compared to a similar development not centrally located or proximate to transit. Thus, the Project would have lower emissions relative to other, more peripherally located development projects.

The comment correctly states that residences would have HVAC systems, as well as other utility consumption, and asks what mitigations are proposed for "those discharges." The Draft EIR estimates emissions from on-site HVAC (e.g., electricity and natural gas usage) as part of the Project's operational emissions. These emissions are reported in the Air Quality Technical Report (Appendix J of the Draft EIR) in Tables 48 and 49. The Draft EIR also quantifies utility-related greenhouse gas emissions as reported in Section IV.O, Climate Change, of the Draft EIR. The Project includes a number of project design features that would reduce its electricity consumption via improved efficiencies (see Project Design Features O-1, O-3, and O-4 on pages 2135 and 2136 of the DEIR), including, for example:

- Construction of new buildings would exceed Title 24 (2005) energy requirements by 15 percent;
- Installing energy-efficient heating and cooling systems, equipment, and control systems;
- Installing consumption feedback modules to provide real-time and historical feedback to residents on their homes' energy consumption;
- Installing energy-efficient appliances (e.g., ENERGY STAR refrigerators, clothes washers, clothes dryers, dishwashers, ventilation fans, and ceiling fans);
- Installing efficient lighting and lighting control systems; and
- Installing efficient pumps and motors for pools and spas within the Mixed-Use Residential Area.

Moreover, the Project would support renewable energy generation, such as solar, via Project Design Feature O-2. This project design feature requires residential land uses within the Mixed-Use Residential Area to purchase 20 percent green power, which would be achieved through the Project's participation in the Los Angeles Department of Water and Power's Green Power Program.

Comment No. 37-30

Water

This area has a semi-arid climate. California has been experiencing a dire water shortage for many years. With water rationing currently imposed on the region, it is irresponsible to even consider adding that much new development, especially the residential component. Several years ago during the back lot fire, low water pressure was a serious issue that inhibited and exacerbated the ability to put out that fire efficiently. What specific improvements and specifications would be imposed on the property development to assure ample water supply in times of crisis?

At the 1-5-11 meeting with the Hillside Federation, Tom Smith said that DWP determines water availability, and that they have asked Universal to improve water storage capacity. Grey water is acceptable for landscaping purposes, but potable water is a completely different matter. What assurances can be provided to the community that the proposed Evolution Plan, including the new residences, will not have an adverse effect on the water supply to the surrounding neighborhoods? What actions are proposed to provide adequate and ample potable water to the site without harming its neighbors or the region? Why is native and drought tolerant landscaping not required for the entirety of the site, without exception?

Response to Comment No. 37-30

As stated in Section L.2, Utilities – Water, and Appendix N-1-2, Water Supply Assessment, of the Draft EIR, the Project is estimated to increase on-site water demand by 1,249.1 ac-ft/year. Of that demand, 1,003.1 ac-ft/year is calculated to be potable water and 246 ac-ft/year is calculated to be recycled water. As noted in the Draft EIR, the estimated water demand does not reflect reductions in water usage that would result from the water conservation measures included as project design features and described in Section L.2 of the Draft EIR. Water is supplied to the Project Site by the Department of Water and Power (DWP). The Los Angeles Aqueducts, local groundwater, purchased water from the Metropolitan Water District and recycled water are the primary sources of water supplies for DWP. In addition, to meet the water demands of the Project, the Applicant would provide replacement water pursuant to the terms of the Surplus Water Supply Augmentation Agreement between the Applicant and DWP. Under this agreement, the Applicant would provide water rights to DWP that DWP does not currently possess, thus

increasing the water supply sources to which DWP has access[50]. The Surplus Water Augmentation Agreement contemplates that the water rights would be from the Central and/or West Coast Basins. As indicated in the Water Supply Assessment for the Project, the Central and West Coast Basins are adjudicated groundwater basins. Under the adjudications, DWP has specified, limited water rights in these basins. The water rights that the Applicant would provide DWP under the Surplus Water Augmentation Agreement would be in addition to DWP's existing rights. As further noted in the Water Supply Assessment, there is an active groundwater rights sales and lease market in the Central and West Coast Basins. Based on the Water Supply Assessment, DWP determined that the Project demands could be offset through the purchase of annual adjudicated water rights in these basins.

With respect to the June 1, 2008, fire on the Project Site, although there were initial reports regarding a lack of adequate fire flow, the County Fire Department ultimately concluded that sufficient fire flow was available and exceeded requirements. Characteristics of the fire such as intensity and speed restricted the placement of fire engines and hose line deployment, which affected the delivery of water, but availability of fire water was not an issue, according to the County Fire Department. (See Appendix FEIR-11 of this Final EIR.) Furthermore, since the June 1, 2008 fire, the County Fire Department issued Fire Department Regulation 29 which requires additional fire protection measures for long-term movie sets and façades.

As detailed in the Draft EIR, future developments within the County portions of the Project Site would be required to comply with the County Fire Department fire flow requirements and future developments within City portions of the Project Site would be required to comply with the City of Los Angeles Fire Department fire flow requirements. As part of the Project, a new fire protection system would be installed to support the potential fire flow demand for the Mixed-Use Residential Area of the proposed Project. New service lines would be constructed to serve the proposed Project. In evaluating the water system, the new on-site water lines would be sized for both fire demand and peak day domestic demand. (See Project Design Feature L.2-1, page 1881 in Section IV.L.2, Utilities – Water, of the Draft EIR.) All water lines constructed as part of the Project that deliver both domestic and fire water would be constructed with the necessary materials and appropriate size to deliver the highest instantaneous demand on the individual water line pursuant to Project Design Feature L.2-2. (See page 1881 of the Draft EIR.) Further, with implementation of Mitigation Measure L.2-1, which would augment the existing DWP

---

[50] *This access would be utilized to offset the proposed Project water demands, which are estimated at 353 acre-feet per year in the County and 650 acre-feet in the City (page 1877, Draft EIR).*

infrastructure through the provision of an on-site pumping station with a capacity of up to a maximum of 16,500 gallons per minute, impacts with respect to fire protection infrastructure would be reduced to a less than significant level.

Further, pursuant to Project Design Feature K.1-11, a drafting reservoir and drafting appliances would be provided and maintained in the County portion of the Project Site with the ability to draft 1.5 million gallons of water designed to the satisfaction of the Los Angeles County Fire Department. (See page 1719 in Section IV.K.1, Public Services – Fire Protection.) As explained in Section IV.K.1, Public Services – Fire Protection, of the Draft EIR, with implementation of the project design features and mitigation measures, Project impacts with respect to fire protection would be less than significant. (See page 1721, Section IV.K.1, of the Draft EIR.)

As noted above, the Project includes water conservation features such as the use of recycled water for landscape irrigation, expanded use of high-efficiency irrigation systems, and use of water efficient landscaping, such as proper hydro-zoning, turf minimization, and use of native/drought tolerant plant materials within the Mixed-Use Residential Area. New areas within the Studio, Business, and Entertainment Areas (other than production activities, entertainment attractions, sets/façades, the theme park, and visitor entries to the theme park and Universal CityWalk) would comply with the County's landscaping design regulations, as applicable. (See pages 1871–1872, and Project Design Feature L.2-3, pages 1881–1882 of the Draft EIR.) Given the nature of production activities and the entertainment uses, native and drought tolerant landscaping is not appropriate for the entirety of the Project Site.

Comment No. 37-31

Electricity/Power

The power consumption demands not only for the proposed back lot residential portion but for the entire Evolution Plan will be enormous. How will that demand be accommodated? Additionally, what back-up and augmentation systems have been proposed? What assurances do the surrounding neighborhoods have that the new demands will not adversely affect their ability to continue to power their homes and businesses at present levels and to accommodate reasonable future growth demands?

Response to Comment No. 37-31

For electrical service, the County portions of the Project Site are served by Southern California Edison and the City portions of the Project Site are served by the Los Angeles Department of Water and Power. As shown in Table 172 on page 1937 in Section IV.L.4, Utilities – Electricity, of the Draft EIR, the projected electrical demand associated with the operation of the proposed Project would be 17,338 kilovolt amperes (kVA) for the portion of

the Project Site that would be located within the City's jurisdiction, and therefore served by the Los Angeles Department of Water and Power. The Los Angeles Department of Water and Power has indicated that the existing electrical system would need to be reinforced and a new distribution system would need to be installed for the City portion of the Project Site. As discussed on pages 1952–1953 in Section IV.L-4, Utilities – Electricity, of the Draft EIR, Project Design Feature L.4-3 provides for a new Los Angeles Department of Water and Power electrical distribution station on the Project Site. In addition, additional electrical lines would be installed both on and off the Project Site. These electrical lines may be added to existing above-ground electrical poles or may be undergrounded. (See Section IV.L.4, Utilities – Electricity, of the Draft EIR, pages 1936–1938.) Thus, although implementation of the proposed Project would result in increased electrical consumption and demand, with implementation of the project design features, Project impacts with respect to electricity would be less than significant. (See page 1954 of the Draft EIR.)

As shown on Table 172 on page 1937 of the Draft EIR, the projected electrical demand associated with the operation of the proposed Project would be 9,499 kVA for the portion of the Project Site that would located within the County jurisdiction, and therefore served by Southern California Edison. Southern California Edison has indicated that it has the capacity in its existing supply system to handle the increase in demand for power supplied by its facilities. However, in order to deliver this increased demand to the Project Site, a new 66 kV line would need to be installed, and this installation would require expansion of the existing Southern California Edison facilities on-site. With this new electrical line and expanded existing on-site substations, and new and expanded on-site distribution substation, increased electrical loads can be supplied and distributed on-site, thereby resulting in a less than significant impact. (See pages 1938–1939 in Section IV.L.4, Utilities – Electricity, of the Draft EIR.)

In addition, as noted in the Draft EIR, the Project includes project design features and energy conservation measures outlined in the Draft EIR. (See Project Design Features L.4-4 through L.4-11 on pages 1953–1954 in Section IV.L.4, Utilities – Electricity, of the Draft EIR.) The projection of the proposed Project's electrical consumption does not account for the Project's incorporation of the project design features and energy conservation measures, which would decrease the proposed Project's electrical consumption. (See pages 1935–1936 of the Draft EIR.)

Comment No. 37-32

What about on-site solar, wind and other self-sustaining power generating devices/systems to fill the Evolution Plan's needs?

Response to Comment No. 37-32

The proposed Project includes a number of project design features that would reduce its electricity consumption via improved efficiencies. The commenter is referred to Response to Comment No. 37-29, above, for a discussion of project design features that would reduce electricity consumption and support renewable energy generation. Also, the proposed Specific Plans would not preclude the possibility for alternative forms of energy production (e.g., solar) to be implemented at the Project Site.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 37-33

Also, if the land swap/annexation proceeds, how would any shared energy resources be divided and jointly governed/managed?

Response to Comment No. 37-33

The analysis of the potential impacts of the Project provided in Section IV.L.4, Utilities – Electricity, of the Draft EIR assumes that the proposed annexation would occur; therefore, the discussion of electricity consumption and demand is according to the service provider wherein the respective portions of the Project would be located. The Project does not propose shared electricity facilities or services but identifies project design features that would be implemented according to each of the provider's respective service areas. In addition, potential impacts were also analyzed assuming a No-Annexation Scenario in which jurisdictional boundaries do not change.

Comment No. 37-34

Solid Waste

Just recently there were serious protest demonstrations in Arcadia regarding the destruction of old growth groves of trees to build yet another dump/land fill. It is irresponsible to keep building and dumping without the intention of finding a sustainable solution for this type of development. If Universal wants to continue to build and develop, as they appear to have plenty of land from which to benefit financially, why not designate a portion of their own property to satisfy the solid waste disposal needs rather than burdening either the City or County with that obligation? If not that, then what mitigations have been provided to address this long-term environmental impact on the City, County and State?

Response to Comment No. 37-34

As discussed on pages 1924–1925 in Section IV.L.3, Utilities – Solid Waste, of the Draft EIR, the implementation of the project design features (Project Design Features L.3-1 to L.3-5) for the proposed Project would ensure the Applicant's continued operation of effective on-site waste management and recycling programs that would divert 65 percent of waste generated from regional landfills in accordance with the proposed City and County Specific Plans. Nonetheless, while the existing landfills serving the Project Site have adequate capacity to accommodate Project-related disposal needs, landfill capacity information does not extend to the year 2030. Due to the uncertainty in future availability and capacity of these landfills over the entire buildout period for the proposed Project, it is conservatively assumed that the Project's operational impacts to landfill capacity would remain significant and unavoidable. Given the regulatory requirements related to development and maintenance of a solid waste disposal facility, and the existing surrounding uses and City and County land use policies, it is not feasible to develop a solid waste disposal facility on the Project Site. Other than waste minimization and diversion, which are project design features (provided on pages 1924 and 1925 of the Draft EIR), no other feasible mitigation measures have been identified to address this potential impact.

Comment No. 37-35

Sewer

Is odor from sewer lines considered a less than significant impact? How will the significant additional flows affect stations downstream that are currently required to lessen the odor escaping from those existing lines? How many new additional stations like the one at Gardner and DeLongpre will be required to eliminate the odor from sewer lines? How much funding will be provided to the City of Los Angeles in the land transfer for the residential development to compensate for the additional services required by that residential development? Will "scrubbers," like those currently employed Studio City to burn off excess sewage, be required to mitigate the impacts of sewage? Where will those scrubbers be placed?

Response to Comment No. 37-35

The City of Los Angeles CEQA Thresholds Guide (2006) requires the wastewater analysis to address issues relating to the capacity of the sewer lines that would serve a project and the impacts of the project on treatment plant capacity. Based on the criteria set forth in the City of Los Angeles CEQA Thresholds Guide (2006), a project would normally have a significant wastewater impact with regard to sewer line capacity if the project would cause a measurable increase in wastewater flows at a point where, and a time when, a

sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained.

As explained in the Draft EIR, to accommodate the increase in wastewater flows resulting from Project implementation, several new major sewer lines (6 inches and larger) would be constructed. The proposed changes to sewer lines specifically include, but are not limited to, additional 8-, 10-, and 12-inch sewer lines in the Mixed-Use Residential Area; an additional 16-inch sewer line off-site that would run parallel to the Los Angeles River Flood Control Channel along River Road and would connect to an existing stub of the Valley Relief Sewer; and removal and reconstruction of some of the existing 12-inch sewer lines along Universal Hollywood Drive. (See page 1842 of Section IV.L.1, Utilities – Sewer, of the Draft EIR.) The City would continue to serve the Project Site's sanitary sewer demands via the Valley Relief Sewer and the Hyperion Treatment Plant. The Applicant would construct the additional on-site sanitary sewer system improvements required to support the additional development per these standards. (See page 1842 of the Draft EIR.)

As discussed in detail in Section IV.L.2, Utilities – Water, of the Draft EIR, the Project would implement a comprehensive program of water conservation measures that would also serve to reduce the Project's demand on the wastewater system. As explained in the Draft EIR, the Project will have a less than significant impact to the City's main off-site sewer lines serving the Project Site. In addition, all new on-site sewer lines would be sized to adequately accommodate increased flows from the Project so that no on-site existing sewer lines would be operating at capacity. (See page 1846 of the Draft EIR.)

With regard to sewer odors, the Project's wastewater flows are not anticipated to cause odors in neighborhoods around the wastewater collection system. As explained in the City's 2011 Sewer Odor Control Master Plan, a natural phenomenon within any wastewater collection system is the production of odorous gases especially hydrogen sulfide.[51] The City has been working to address sewer odor issues and has made substantial progress in controlling odors within its sewer system. Many odor control measures are currently being implemented, including the use of air scrubbers at various problem locations in the collection system. The 2011 Sewer Odor Control Master Plan evaluates the City's current odor control program, conducts studies in strategic areas throughout the City, identifies causes of odors, and provides recommendations for

---

[51] *City of Los Angeles, Wastewater Engineering Services Division, Bureau of Sanitation, 2011 Sewer Odor Control Master Plan, August 2011, page 5; www.lasewers.org/sewers/odors/pdf/Odor_Master_Plan_2011_pdf.*

improvements. As noted in the 2011 Sewer Odor Control Master Plan, sewer-related odor complaints to the City odor complaint hotline continue to decline steadily.

Odor complaints along the La Cienega San Fernando Valley Relief Sewer (Valley Relief Sewer) prompted the City to investigate the causes and determine appropriate measures to alleviate odor emissions. Subsequently two carbon scrubbers were constructed along the Valley Relief Sewer: a 5,000 cfm carbon scrubber was constructed at the lower reach of the Valley Relief Sewer at the Genesee Siphon and a 10,000 cfm carbon scrubber was constructed at the upper reach of the Valley Relief Sewer at De Longpre Street and Gardner Avenue in Hollywood. In addition, a chemical addition program, utilizing a continuous addition of magnesium hydroxide, was implemented for the Valley Relief Sewer corridor in September 2005. (City of Los Angeles 2011 Sewer Odor Control Master Plan, page 69.) Since the completion of the Sierra Bonita Scrubber, the sewer gas pressure has improved to below atmospheric levels, in most cases.

As to the question regarding funding that will be provided to the City of Los Angeles to compensate for the additional services required by the Project's residential development, the City would derive property tax revenue, as well as significant annual revenues from other taxes including household-related sales tax and utility tax, real estate transfer tax from periodic resale of the condominiums, among others, and one-time revenues from construction-related taxes (e.g., contractor gross receipts tax, construction materials sales tax, residential development tax and dwelling unit construction tax), and from the real estate transfer tax on initial sale of the condominium units. In addition to the project design features and mitigation measures included in the Draft EIR with respect to public services and utilities, these new tax revenues from development of the proposed Project could be used for the funding of expansion of City services and facilities.

Comment No. 37-36

Noise

Is NBC Universal excluded from the more restrictive nighttime limits of the LA County Noise Ordinance? If so and if only daytime limits apply to Universal, isn't the noise section of the DEIR completely inadequate since the difference between these limits represents a doubling of the noise level to the human ear? This reduced level of noise restriction standards will have an especially profound effect on the proposed housing element.

Response to Comment No. 37-36

As discussed in Section IV.C, Noise, of the Draft EIR, the Project would not be excluded from the nighttime limits of the Los Angeles County Noise Ordinance. The Draft EIR, Section IV.C, Noise, provides a comprehensive analysis of all of the Project's potential noise impacts. As noted in the summary of the proposed Universal Studios Specific Plan

on page 994 of the Draft EIR, the Project's operational and construction sound sources in the County portions of the Project Site would comply with Title 12, Chapter 12.08 of the Los Angeles County Code, which is the County's Noise Ordinance and which provides regulations addressing both daytime and nighttime noise levels. Similarly, as discussed on page 996 of the Draft EIR, the proposed Universal City Specific Plan states that operational sound sources in the City portions of the Project Site would be subject to the LAMC's noise regulations, as well as the noise limits for daytime and nighttime noise, which are based on the County Noise Ordinance's L_{50} and L_{max} standards. The City's construction sound sources will be subject to the LAMC's noise regulations, which also limit daytime and nighttime noise. The Draft EIR also provides a comprehensive analysis of both potential daytime and nighttime impacts resulting from the Project's construction and operation on pages 998–1024 in Section IV.C., Noise, of the Draft EIR.

Comment No. 37-37

Shouldn't the selection of the locations upon which the noise study results are based include locations where Universal's noise output has been proven to be problematic in the past? If the locations studied are biased, aren't the DEIR noise portion and its conclusions also biased? Who, representing either the County or City of Los Angeles, has reviewed the locations studied to determine whether they are adequate to support the conclusions of the DEIR and that they represent an accurate overview of sound emissions to the general community?

Response to Comment No. 37-37

As noted on page 971 in Section IV.C, Noise, of the Draft EIR, the noise environment surrounding the Project Site is defined by a variety of noise sources, including Hollywood Freeway traffic, local street traffic, existing activities throughout the Project Site area, and occasional aircraft overflights. Reflecting the diversity of conditions found around the Project Site, the noise analysis addressed a broad range of potential locations, including analysis of 12 different receptor areas which included 47 receptor locations (see Draft EIR, page 971.) The 12 areas represent the diversity of conditions found around the Project Site and include areas from which community members have raised concerns regarding noise from the Project Site, such as Toluca Estates, Toluca Lake, Lakeside Golf Club, Cahuenga Pass and Hollywood Manor. As noted on page 971 of the Draft EIR, the forty-seven (47) locations, as shown on Figure 93 on page 973 of the Draft EIR, were chosen in order to obtain a broad understanding of the existing ambient noise environment and included: 41 residential receptors, 1 public school, 3 commercial properties, 1 public park and 1 landmark location.

The purpose of the monitoring was to measure ambient noise levels existing around the Project Site in order to compare the proposed Project sound levels to the ambient

conditions. The increase in sound levels as compared to the existing ambient conditions and code limits was then evaluated. In order to have the most conservative analysis, the future Project sound levels were compared to the lowest existing ambient levels, as this comparison would indicate the greatest potential impact. The City Planning Department, County Department of Regional Planning, and County Department of Public Health reviewed and approved of the methodology of the noise study.

Comment No. 37-38

The community receptor area in Table 55 for the Cahuenga Pass does not include any locations at which Universal has been cited in the past for violation of the LA County Noise Ordinance. Within that area, there is a canyon/ravine that topographically forms an acoustical funnel for noise. When coupled with the typical summer inversion layer, sound from Universal's property carries to locations on and near the intersection of Woodrow Wilson and Passmore Drives. The LA County Health Department took readings twice in the past at locations within this funnel area, and each time the amplified noise from Universal's property was both determinable and in excess of the level allowed by the LA County Noise Ordinance. The second time, then LA County Deputy District Attorney Gilbert Garcetti issued a citation to then Universal Chairman Lou Wasserman. Attached is a copy of figure 93 from the DEIR with this area identified and a copy of the first noise study.

Response to Comment No. 37-38

As discussed in Response to Comment No. 37-37 and noted on page 971 in Section IV.C, Noise, of the Draft EIR, the noise environment surrounding the Project Site is defined by a variety of noise sources, including Hollywood Freeway traffic, local street traffic, existing activities throughout the Project Site area, and occasional aircraft overflights. The Draft EIR noise analysis studied 12 areas, which represent the diversity of conditions found around the Project Site and include areas from which community members have raised concerns regarding noise from the Project Site, such as Toluca Estates, Toluca Lake, Lakeside Golf Club, Cahuenga Pass and Hollywood Manor. Within the 12 noise receptor areas, monitoring was conducted at 47 receptor locations. The noise monitoring locations were selected to obtain a range of potential noise environments from each receptor location and to reflect a wide variety of conditions. In the Cahuenga Pass area, the noise study included 11 receptor locations spread across the neighborhood (see Figure 93, HHC1–HHC11). The locations were selected to represent the wide scope of conditions in the community, including locations close to the Project Site (HHC3, HHC9, HHC10), locations that have a clear line of sight to the Project Site and which are at the top of the hills (HHC4 and HHC 5,) and locations that are in canyon areas (HHC2 and HHC7).

The comment states that there have been citations issued to Universal in the past for violations of the County Noise Ordinance and attaches a copy of a portion of a prior

noise study conducted for the Project Site related to a project proposed in the 1990s and a graph of noise sampling supposedly done in the Cahuenga Pass area dated 1979. The referenced attachment is provided as Comment No. 37-50. There is no documentation of a citation accompanying the 1979 data and it cannot be discerned from the graph whether there was a violation of County noise standards at the time of the sampling. It is important to note that there have been many changes to the Project Site and area since the 1970s. For example, the Gibson Amphitheatre was an open-air venue in the 1970s. The amphitheatre was enclosed in approximately 1981, which changed the noise environment in and around the Project Site.

A Notice of Violation was issued by the County on January 26, 2011, for exceedance of the exterior noise standards at one location during one night of the Halloween Horror Nights event that occurred through the month of October 2010. For its sound impact study to assess sound levels from the Halloween Horror Nights event, the County Department of Public Health monitored noise levels at 3401 and 3488 Blair Drive, Los Angeles. The monitoring for the Draft EIR noise study included locations in the same area, including 3325, 3341, 3405, 3424, 3480, and 3509 Blair Drive, Los Angeles. A copy of the County noise study is included as Appendix FEIR-5 of the Final EIR.

Comment No. 37-39

After visiting the locations studied in the DEIR, HHCI through HHCII, these locations can be characterized as either: I) generally low and deep in the freeway noise, 2) around the corner from direct sound impact, 3) high and far away from Universal in an area where sound is more readily dispersed, or 4) close to Universal but totally sheltered from sound emanating from the freeway and Universal. In other words, the locations selected are biased and not representative of actual noise intrusion experienced by hillside residents. How will that be addressed and rectified in the FEIR?

Response to Comment No. 37-39

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. As explained on pages 971–974, and shown on Figures 92 and 93 on pages 972–973 in Section IV.C, Noise, of the Draft EIR, and explained in Appendix F-1, the noise consultant identified 12 noise receptor areas surrounding the Project Site. The 12 noise receptor areas represent the diversity of conditions found around the Project Site and include areas from which community members have raised concerns regarding noise from the Project Site, such as Toluca Estates, Toluca Lake, Lakeside Golf Club, Cahuenga Pass and Hollywood Manor. Within the 12 noise receptor areas, monitoring was conducted at 47 receptor locations.

For the Cahuenga Pass neighborhood, noise monitoring took place at 11 receptor locations in order to represent the varying conditions within this hillside community. As highlighted on page 978 of Section IV.C, Noise, of the Draft EIR, all receptor locations within the Cahuenga Pass area are exposed to freeway noise to some degree. The locations were chosen to ensure that the entire range of exposure to all potential noise sources, such as the freeway and the Project Site, was analyzed. Contrary to the commenter's assertion and as highlighted on Figure 93 of Section IV.C, Noise, of the Draft EIR, the locations represent a wide scope of conditions in the community, including locations close to the Project Site (HHC 3, HHC 9, and HHC 10), locations that have a clear line of sight to the Project Site and which are at the top of the hill (HHC 4, HHC 5, and HHC 10), and locations that are in canyon areas (HHC2 and HHC 7).

Comment No. 37-40

Signage

The signage requested for the proposed development alludes to an urban context akin to Times Square in New York City or the Strip in Las Vegas. Such signage is not appropriate for a location whose character is largely suburban and, in some cases, rural. In the hills surrounding the proposed development many of the streets are narrow, one-lane roads that frequently terminate in open wilderness. While the proposed signage might be appropriate in locations that are primarily commercial in nature, it seems incongruous to the character of our hillside neighborhoods.

Response to Comment No. 37-40

The proposed City and County Specific Plans contain regulations with respect to type, size, and location of signage that promote compatibility with the surrounding land uses. One of the purposes of these regulations is to ensure that signs would not dominate the visual environment but would diversify the visual environment consistent with what one would expect in one of the City's Regional Centers, as designated within the City's General Plan Framework Element (see Section IV.A.1, Land Use – Land Use Plans/Zoning, of this Draft EIR for additional information) as well as within a County General Plan designated Multipurpose Center and Major Commercial Area. Further, the City of Los Angeles General Plan Framework defines Regional Centers as focal points of regional commerce, identity and activity containing a diversity of uses whose physical form is substantially differentiated from the lower-density neighborhoods of the City (refer to the City of Los Angeles General Plan Framework Chapter 3, Land Use Goals, Objectives and Policies, Issue Two: Uses, Density, And Character, Regional Centers). As concluded in the Draft EIR in Section IV.D, Visual Qualities, and summarized on page 1102, Project signage from all viewpoints analyzed in the Draft EIR would not result in substantial adverse changes to

the environment and, as such, impacts regarding visual resources attributable to Project signage would be less than significant. See also Response to Comment No. 37-10.

Comment No. 37-41

One of our particular concerns regarding signage is the request to remove the small area at the comer of Barham and Buddy Holly Drive from the Mulholland Scenic Corridor Specific Plan and to instead place it in the City Specific Plan. Universal's attorney, Maria Hoy of Latham and Watkins, confirmed that the reason behind this request is so that Universal could have the "option" to convert their current conventional billboard to a digital/electronic billboard, which would not be allowed under the Mulholland Plan. Why should Universal be allowed exemption from the Mulholland Specific Plan in order to negatively impact the visual appearance and quality of life in our neighborhood? What about this project makes it eligible for consideration for removal from an established specific plan?

Response to Comment No. 37-41

The issues raised in this comment were also raised earlier in Comment No. 37-7. The commenter is referred to Response to Comment No. 37-7, above. In addition, it is also important to reiterate that this area is proposed to be removed from the Mulholland Scenic Parkway Specific Plan Area and included within the proposed Universal City Specific Plan area in order to create unified and coherent regulations for all portions of the Project Site to be located within the City. While the proposed City Specific Plan would permit the existing sign to be converted to an Electronic Message sign, that is not the reason for the requested amendment. The amendment and other entitlements are intended to create a cohesive development. Additionally, the Draft EIR (Section IV.E.2, Light and Glare – Artificial Light, pages 1260–1277) analyzed the potential impact of artificial light including from signage and concluded that impacts would be less than significant due to the regulations in the proposed City and County Specific Plans.

Comment No. 37-42

We are also concerned about the impact the Lankershim Edge Sign District will have on our community. Here, they propose to add the equivalent of 14,000 sq. ft of brightly lighted electronic advertising plus supergraphic signage, or the equivalent of one double-faced plus 20 full-sized billboards. Page 139 of the Project Description 2A states that "animated, moving, programmed, flashing, neon, LCD and similar lighting displays or installations shall be permitted" in this area despite a pending city sign ordinance that would prohibit such signage in this location. Why should this project be granted the ability to establish sign districts outside the boundaries being considered by the City of Los Angeles?

Response to Comment No. 37-42

With respect to the signage permitted within County Sign District 1—Lankershim Edge Sign District, pursuant to Section 18.C.3.e. of the proposed County Specific Plan, which would apply to those portions of the Project Site within the County's jurisdiction, a maximum of two (2) Electronic Message and three (3) Supergraphic Signs are permitted within the Lankershim Edge Sign District (in addition to other types of signs, such as Area and Tenant Identification Signs, as listed in detail on pages 318–321 (Section II, Project Description) of the Draft EIR. In addition to limiting the number of Electronic Message Signs, the regulations set forth in the proposed County Specific Plan (see Appendix A-2 of the Draft EIR) address the following: (1) maximum Sign Area per individual sign; (2) height of sign; (3) minimum distances between Electronic Message Signs; (4) locations where these types of signs are permitted; (5) lighting limitations; and (6) limitations on the hours of operation.

Supergraphic Sign regulations are also set forth in the proposed County Specific Plan (see Appendix A-2 of the Draft EIR), and, in addition to limiting the number of such signs, address the following: (1) limitations on the size of the Commercial Message; (2) limitations on sign height; (3) limitations on sign types; and (4) locations where these types of signs are permitted.

As discussed on page 1096 in Section IV.D, Visual Qualities, of the Draft EIR, "…supergraphic and off-site signage introduced within the Lankershim Edge Sign District could present a change in prominence due to the general increase in signage type and amount within The Lankershim Frontage Visual Quality Area, as compared to existing conditions. However, as proposed signage would be limited in location (i.e., animated and moving signs would be prohibited from facing residential land uses), and overall size and height, substantial changes in coverage would not occur." As discussed on page 1097 in Section IV.D, Visual Qualities, of the Draft EIR, given the existing uses presently located along the eastern side of Lankershim Boulevard, no substantial changes in contrast would occur, since signage would be consistent with the existing urban character and entertainment center uses within this area. Signage within the Lankershim Frontage View Quality Area could include Supergraphic signs within the Lankershim Edge Sign District and City Sign District 2A, as well as off-site signs within the City portions of the Lankershim Frontage View Quality Area. As noted in the Draft EIR, in adopting the Citywide ban on off-site and Supergraphic signs the City determined that Supergraphic signs and off-site signs create substantial adverse aesthetic impacts. Therefore, these off-site and Supergraphic signs would result in a significant impact to the visual character of the Lankershim Frontage Visual Quality Area. However, as discussed above, the proposed City and County Specific Plans include limitations on the location of Supergraphic and Electronic Message Signs and restrictions on the lighting of Electronic Message Signs. Further, the Project would

substantially improve the visual character of the Lankershim Frontage View Quality Area through the implementation of streetscape improvements and the development of new buildings within the Lankershim Frontage Visual Quality Area that would replace the existing disconnected improvements with a cohesive and integrated streetscape design that would visually integrate public and private improvements and would promote visual compatibility with the surrounding neighborhoods. These Project improvements to the existing visual character of this area would reduce visual impacts along the Project's Lankershim Boulevard frontage to a less than significant level.

Comment No. 37-43

Additionally, the DEIR makes the following claims related to the Scenic Corridor designation of Barham Boulevard and Forest Lawn Drive: "Barham Boulevard is designated as a Major Scenic Highway II in the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan. Since the area in which Barham Boulevard travels contains views of both natural and urban elements (e.g., urban development north of the Project Site within the City of Burbank) and the Community Plan provides no indication as to why Barham Boulevard was designated as a scenic highway, it is concluded that the highway was chosen for its views of the Cahuenga Pass for southbound motorists, and the San Fernando Valley and Verdugo Mountains for northbound motorists.

And, "Forest Lawn Drive is designated as a Major Scenic Highway II in the City's General Plan Transportation Element. As stated above, the Transportation Element describes the selection criteria for scenic highways as including natural scenic qualities in undeveloped or sparsely developed areas of the City, or urban area(s) of cultural, historical, or aesthetic value, which merit protection and enhancement. The Community Plan provides no indication as to why Forest Lawn Drive was designated as a scenic highway. Based on its surroundings, it is concluded that Forest Lawn Drive was chosen for its views when traveling east, which are of a sparsely developed area and are framed by the Santa Monica Mountains to the south and the Los Angeles River Flood Control Channel to the north." On what basis are the assumptions made that Forest Lawn Drive is only valued for its views traveling east and Barham is valued only for its views traveling south? What are the consequences for the signage proposed at the corner of Barham and Forest Lawn Drive if the value of these scenic corridor [sic] are considered from all vantages?

Response to Comment No. 37-43

As described in Section IV.D, Visual Qualities, of the Draft EIR, Barham Boulevard and Forest Lawn Drive are each designated as a Major Scenic Highway II in the City's General Plan Transportation Element, which describes the selection criteria for scenic highways as including natural scenic qualities in undeveloped or sparsely developed areas of the City, or urban area(s) of cultural, historical, or aesthetic value, which merit protection

and enhancement. Although the Community Plan provides no indication as to why Barham Boulevard and Forest Lawn Drive were designated as scenic highways, Appendix E (pages 1–2) of the City's Transportation Element discusses Designated Scenic Highways and indicates that Barham Boulevard is designated a Scenic Highway as a "dramatic pass with northerly Valley views" and Forest Lawn Drive is designated a Scenic Highway due to the presence of the Hollywood Hills and as a gateway to Griffith Park. Section IV.D.2.d, Visual Qualities, of the Draft EIR concludes that Barham Boulevard was designated a scenic highway for its views of the San Fernando Valley and Verdugo Mountains for northbound motorists and for views of the Cahuenga Pass for southbound motorists and that Forest Lawn Drive was chosen for its views when traveling east, which are of sparsely developed area and framed by the Santa Monica Mountains to the south and the Los Angeles River Flood Control Channel to the north.

Contrary to the assertion in the comment, views traveling both south and north on Barham Boulevard were considered in the EIR with regard to Barham Boulevard.

Regarding Forest Lawn Drive, page 1050 of the Draft EIR explains that views from that Forest Lawn Drive when traveling east are of a sparsely developed area and are framed by the Santa Monica Mountains to the south and the Los Angeles River Flood Control Channel to the north. In contrast, the views for vehicles traveling west towards the Project Site along Forest Lawn Drive are of a major roadway with low-rise commercial development and scattered trees and small ornamental shrubs, as well as portions of the North Back Lot Visual Quality Area, including the Studio Gate, transportation lot and Lakeside Plaza office building. Nonetheless, it is important to note that the evaluation of the potential impacts of Project signage was considered from all vantage points from which the Project Site would be visible (for example, pages 1073–1076 of the Draft EIR provide an analysis of the Barham Boulevard Corridor traveling south and pages 1076 and 1077 of the Draft EIR provide an analysis of the Barham Boulevard Corridor traveling north). The conclusions regarding the scenic highway designations did not limit the impact analysis. A discussion regarding the potential impacts of the proposed Project including signage at Barham Boulevard and Forest Lawn Drive is provided on pages 1078 and 1079 of the Draft EIR, and the Draft EIR concludes that visual impacts would be less than significant. See Section IV.D, Visual Qualities, of the Draft EIR, for further discussion.

Comment No. 37-44

Fire, Police, Sheriff, and Emergency Services

The Evolution Plan proposes to split off the back lot portion for residential development and to annex it to the City of Los Angeles. It proposes two specific plans for the existing site - the major portion representing largely the County with the studio and theme park uses, and the other in the City for the residential annexation. This annexation and splitting would

involve the LA County Local Agency Formation Committee/LA LAFCO. Universal proposes to sell off the entitlements that they hope will be granted for the back lot to real estate developers to, in effect, underwrite the long-term costs of development for the proposed new County specific plan improvements. The City of Los Angeles will bear the brunt of the costs of providing utilities and services to the proposed newly annexed area, largely "in exchange" for new real estate tax revenues. How will these new tax revenues justify the costs and inconveniences to the City's residents?

Response to Comment No. 37-44

With regard to City infrastructure and resources, the Draft EIR analyzes the potential impacts to public services and utilities in Sections IV.K, Public Services, and IV.L, Utilities, of the Draft EIR. The Draft EIR concluded that with the incorporation of the described project design features and mitigation measures, the Project's impacts would be less than significant with regard to City Services (fire, police, parks, and libraries) and City-provided utilities (water, sewer, and electricity). See Section K.1, Public Services – Fire Protection (pages 1694–1721); Section K.2, Public Services – Police/Sheriff (pages 1729–1749); Section K.4, Public Services – Parks and Recreation (pages 1788–1806); Section K.5, Public Services – Libraries (pages 1818–1831); Section L.1, Utilities – Sewer (pages 1840–1852); Section L.2, Utilities – Water (pages 1868–1883), and Section L.4, Utilities – Electricity (pages 1931–1950). Section IV.L.3, Utilities – Solid Waste (pages 1906–1925), of the Draft EIR also analyzed solid waste and concluded that the Project's potential impacts related to construction solid waste would be less than significant with the incorporation of the project design features. However, due to the uncertainty of future capacity of landfills outside of the City (the City does not have operating landfills within the City), the Draft EIR conservatively assumes that the Project's impacts related to solid waste during operations would remain significant and unavoidable after incorporation of the project design features.

These conclusions are reached independent of any benefits that would accrue to the City and County General and Special Funds arising from the various taxes paid by the future users of the Project Site. The new tax revenues from development of the proposed Project could be used for the funding of expansion of City services and facilities. For the City of Los Angeles, short-term additional revenues include sales tax from construction materials, gross receipts tax from construction companies, residential development tax, dwelling unit construction tax, and real estate transfer tax from the initial sale of new for-sale housing. In the long term, both the City and County would receive additional annually recurring revenues from new development. For the City of Los Angeles, new revenues would be derived from studio, studio office, residential, and retail uses, including property tax, utility users' tax, gross receipts tax, parking tax, real estate transfer tax (from periodic resale of for-sale housing), and a variety of household-related tax revenues.

Comment No. 37-45

Mr. Smith stated that Universal will expand County Fire Station 51 on their property to fill the demands that their new development plans will require. Mr. Smith also stated that existing LAFD Station 76 does not have sufficient room on site to accommodate the new equipment necessary to fight high-rise fires in the proposed back lot residential area to be annexed to the City of Los Angeles. The existing neighborhoods served by Station 76 are very attached to the station and its staff and rely on its efficient operation. The current site is optimally located to provide prompt and efficient services to the present users. The neighborhoods are very reluctant to see Station 76 relocate, thereby putting existing residences and businesses in potential jeopardy from delayed emergency response services. What assurances do existing users have that a relocated station will not slow emergency response times? Will County Fire Station 51 be expanded prior to initiation of the project?

As the impetus to enlarge 76 can be attributed solely to the proposed new back lot high rises, Universal should bear the entire cost of the relocation, expansion and construction, not merely a "fair share." Will that be the case? In lieu of that, why shouldn't Universal bear the entire cost of a completely new, additional LAFD station? Also, no new high-rise construction should be undertaken or permits granted until such time as LAFD has the ability to fulfill its responsibilities to fight those potential high-rise fires whether through an additional station or a relocated, expanded station. Will that be the case?

Response to Comment No. 37-45

The Project does not propose the relocation of Fire Station 76, as suggested by the comment. As discussed in Section IV.K.1, Public Services – Fire Protection, of the Draft EIR, the City Fire Department has stated that the inclusion of multiple high-rise structures and multiple high-density residential units (i.e., four to six stories in height or greater) would require the expansion of existing fire fighting capabilities to serve the Project Site, specifically a City Fire Department truck company within one mile of the Project Site and a City Fire Department engine company within 0.75 mile of the Project Site. Since the City Fire Department has concluded that Fire Station 76 cannot physically house another response vehicle, as the Draft EIR explains on page 1701, construction of a new fire station would be required in order to service the proposed Mixed-Use Residential Area and to maintain service for adjoining uses. As such, Mitigation Measure K.1-2 is provided to ensure that the demands for fire services generated by the proposed Project are satisfactorily met. With implementation of Mitigation Measure K.1-2, all potentially significant impacts related to City Fire Department facilities would be reduced to acceptable levels. (Draft EIR, page 1701.) With regard to County Fire Department facilities, as discussed on pages 1704–1705 of the Draft EIR, at Project build-out, the County Fire

Department would require expanded County fire fighting facilities, which may be a new fire station or remodeling of the existing Fire Station 51 on the Project Site to accommodate additional equipment and staffing (Facility Improvements). Pursuant to Mitigation Measure K.1-5, the Applicant or its successor shall construct or cause to be constructed and furnish the Facility Improvements at no cost to the County as well as providing the quint and ancillary equipment for the quint, or similar equipment, at no cost to the County.

As indicated in Mitigation Measure K.1-5, the County fire improvements would be constructed/conveyed to the County before: (a) the first new building that is 75 feet or greater in height; (b) the first new building that is 70,000 square feet in total floor area; or (c) the last of multiple buildings less than 75 feet in height that cumulatively exceed 100,000 square feet of floor area in the same vicinity. As indicated in Mitigation Measure K.1-2, the City fire mitigation must be in place prior to issuance of the first building permit for a building 75 feet tall or greater or more than 100 units of high-density residential. Mitigation Measure K.1-2 does not provide for "fair-share" funding.

After mitigation, no significant impacts with respect to fire protection would occur.

Comment No. 37-46

Given the state of our current economy, city-, county-, state-, and nationwide budgets and services are being cut on a daily basis. To add to the burden of our diminishing security forces is irresponsible and puts the citizenry in jeopardy. Currently, the North Hollywood LAPD station serves our Cahuenga Pass neighborhood and response time is slow. Our association has unsuccessfully enquired about changing jurisdiction to the Hollywood LAPD station to improve response time. To add the proposed 2,937 residential back lot units to the already overburdened NoHo LAPD station will inevitably further delay response times. Should the land swap/annexation proceed, what guarantees will Universal provide regarding timely police protection to our neighborhood and to the neighboring communities? Will Universal pledge to fund, in perpetuity, the salaries of additional police officers as well as the facilities, equipment and support staff required for them to properly perform their jobs?

Response to Comment No. 37-46

As explained on page 1735 of the Draft EIR, Project development could result in an increase in response time along sections of Campo de Cahuenga Way, Cahuenga Boulevard, and Lankershim Boulevard in the area of the Project Site. The increase in response time could be avoided by the City Police Department using an alternate route. The proposed Project would add new on-site streets, particularly in the Mixed-Use Residential Area, thus creating additional alternative routes that the City Police Department and the County Sheriff's Department could utilize to respond to on-site calls for service.

Additionally, any increase in traffic would not greatly affect emergency vehicles, since the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. As concluded in the Draft EIR, this impact is not considered significant since emergency response times would not be substantially affected, given that there is a significant traffic impact at limited locations and the availability of alternative routes, given the street pattern in the area surrounding the Project Site.

Further, as discussed in Section IV.K.2, Public Services – Police/Sheriff, of the Draft EIR, the Applicant shall provide to the City of Los Angeles Police Department at no rent the non-exclusive use of desk space for two officers within a community serving facility in the Mixed-Use Residential Area. (Draft EIR, Mitigation Measure K.2-1.) The Applicant shall also provide a new facility of up to 16,000 square feet within the County portion of the Project Site, for the shared use of the County Sheriff's Department, contract security, and corporate security for the Project Site. (Draft EIR, Mitigation Measure K.2-2.) Additionally, pursuant to Mitigation Measure K.2-3, the proposed Project shall provide private security services during important entertainment events at the Project Site. Further, as explained on page 1731 of the Draft EIR, the proposed Project would include design features that would include recommendations of the City Police Department's Design Out Crime Guidelines. These project design features may include an on-site security force, illuminating parking lots with artificial lighting, use of closed-circuit television monitoring and recording of on-site areas, maintaining security fencing along the Project Site's eastern edge to restrict public access, and way-finding lighting. (Draft EIR, Project Design Feature K.2-2, page 1747.) With the implementation of the proposed project design features and mitigation measures Project impacts on police/sheriff services would be reduced to less than significant levels. The commenter is referred to Section IV.K.2, Public Services – Police/Sheriff, of the Draft EIR, for a detailed analysis of the Project's impacts on police/sheriff services.

Comment No. 37-47

Schools

Mr. Smith cited approximately 6,500 new residents as occupants of the proposed housing. Undoubtedly some of them will include children in need of schooling as well as transportation to and from those schools. He also stated that there was sufficient Middle and High School capacity within the existing LAUSD system, but a lack of Elementary School spaces. Valley View Elementary School is a very small neighborhood school closest to the Universal lot. What does Universal propose to do to help Valley View Elementary and facilitate construction of new primary schools to educate the children living in their proposed residential development?

Response to Comment No. 37-47

Based on data provided by LAUSD, Valley View Elementary School is currently operating under capacity, with a surplus of 187 seats, as of the 2008–2009 school year. (See Table 146 on page 1756, Section IV.K.3, Public Services – Schools, of the Draft EIR.) As noted in the Draft EIR, future school capacity determinations are based on LAUSD's 5-year projections, which constitute the best available information (i.e., the LAUSD does not forecast beyond a 5-year time frame). Based on LAUSD's 2013–2014 forecast, Valley View Elementary School will continue to operate under capacity, with a surplus of 148 seats. (See Table 147 on page 1757 of the Draft EIR.) As discussed in the Draft EIR, the Project's residential and non-residential uses would increase the demand for public school classroom seating capacity within the Los Angeles Unified School District (LAUSD), and Valley View Elementary School, would be over capacity, whereas sufficient capacity would be available within the local middle and senior high school. (Draft EIR, pages 1763–1764.) As such, the Project would cause a significant impact to elementary school capacity levels. The analysis conservatively assumes that all school-age children would attend the neighboring public schools rather than private or charter schools. Nevertheless, LAUSD is authorized under State law to levy a fee on the construction of new residential units, commercial development and parking structures for the purpose of funding the construction or reconstruction of school facilities. LAUSD's current fee is $3.87 per square foot of new residential floor area, $0.47 per square foot of non-residential development, and $0.09 per square foot of a parking structure. Pursuant to state law, the mandatory payment of these school fees in conformance with applicable State law, would provide full and complete mitigation of school impacts for the purposes of CEQA, and the impacts to school capacity levels and facilities would be reduced to a less than significant level. (Draft EIR, Section IV.K.3, pages 1767–1769; and Draft EIR Appendix M.)

Comment No. 37-48

Parks

An approximately 35 acre linear public park with designated parking available for non-resident users has been proposed, theoretically under the purview of the Home Owners' Association of the new residences. If it is to be under the control of the HOA, why are there are no assurances that it will remain open to the general public in perpetuity? What commitments are there that the HOA will not only maintain any new parks on the Universal property in perpetuity but also ensure that they will always be accessible to all Los Angeles residents? Wouldn't it be more sensible to deed this land over to the city, county or other public agency to ensure its protection and accessibility in perpetuity? What guarantees will Universal or its assignees provide that these parks will remain in perpetuity as parks and not be bulldozed for other for-profit purposes?

Response to Comment No. 37-48

As stated on page 1798 of Section IV.K.4, Public Services – Parks and Recreation, of the Draft EIR, following Project approval, the Applicant would be required to execute and record covenants pursuant to Section 5(a) of the proposed City Specific Plan binding any and all future owners of property in the subdivided residential area, and those covenants would require the park and recreational space required under the proposed City Specific Plan to be restricted for such uses accessible to the general public in perpetuity.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 37-49

Conclusion

As evidenced by the length of our response, the Board of Directors of the CPPOA, on behalf of its membership, has significant concerns regarding the Evolution Plan. In particular, we continue to assert that the Evolution Plan and the Metro Universal Plan should be considered concurrently for the purposes of determining the environmental impacts this project will have on the character and quality of life in our community.

We identified what we believe to be significant flaws and omissions in the DEIR as well as inadequate mitigations based on faulty and misinformed assumptions about our neighborhood. We respectfully ask that development of this project take into consideration the points we raise here and that future iterations of this proposal are inclusive of the opinions and beliefs of members of our community.

We find the widespread “significant and unavoidable impacts” cited in the DEIR unacceptable, particularly in a period of increasing calls for sustainable development. As it is currently presented, our organization cannot support this project.

I want to thank members of my board: Dan Bernstein, Florence Blecher, Eryk Casemiro, Stephen Goldfisher, Judy Marlin, Patricia Weber and our immediate past president, Krista Michaels, for their dedication to this process. We thank the following organizations for their efforts on behalf of our community and support their views on this proposal:

- Campo de Cahuenga Historical Memorial Association
- Coalition to Ban Billboard Blight
- Communities United for Smart Growth
- Friends of the Los Angeles River

As President of the Cahuenga Pass Property Owners' Association, I thank you for your time. Our organization welcomes the opportunity to work with you and the applicant to create a socially, economically, and ecologically sustainable vision for this site and our community.

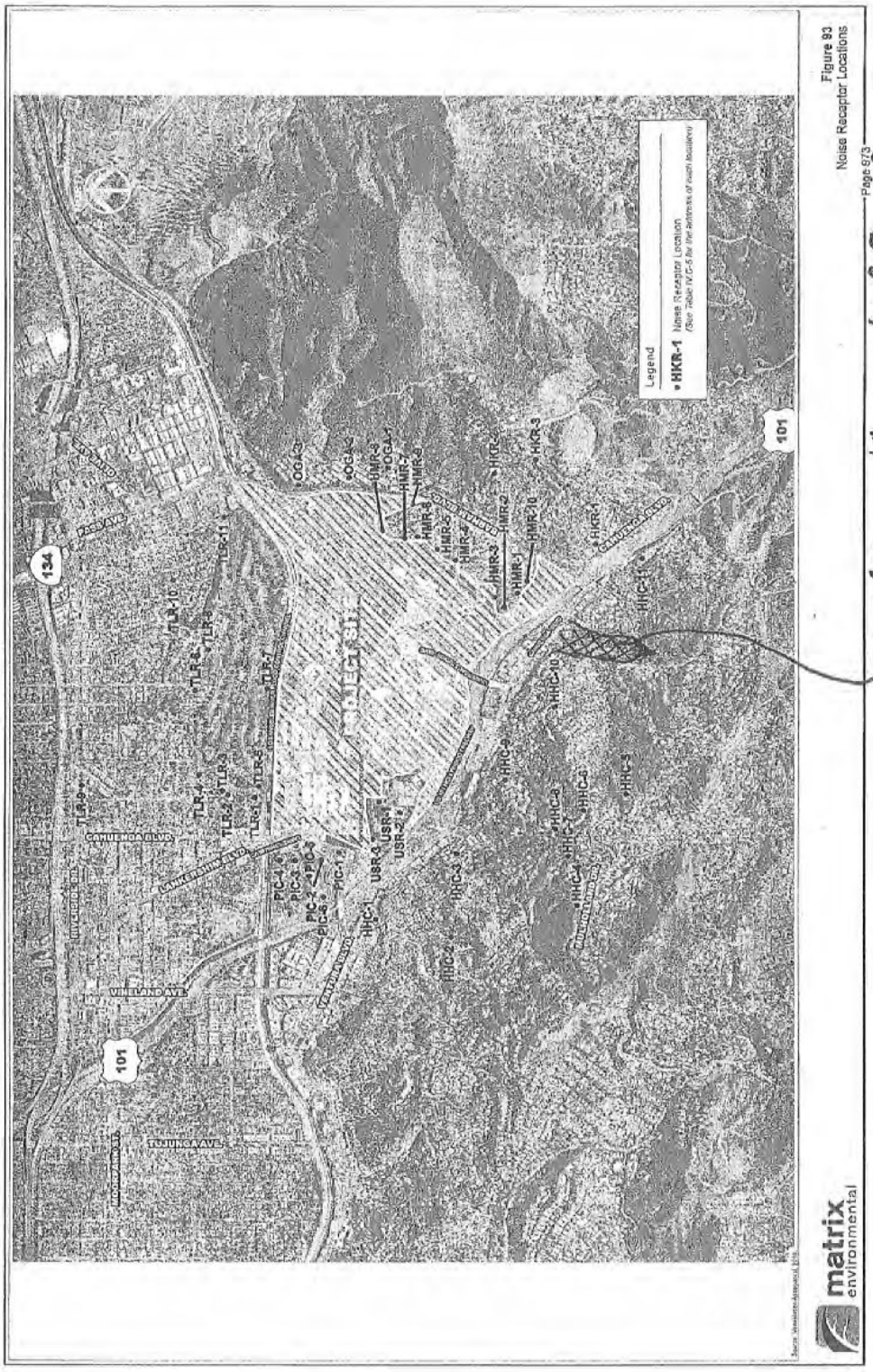
Response to Comment No. 37-49

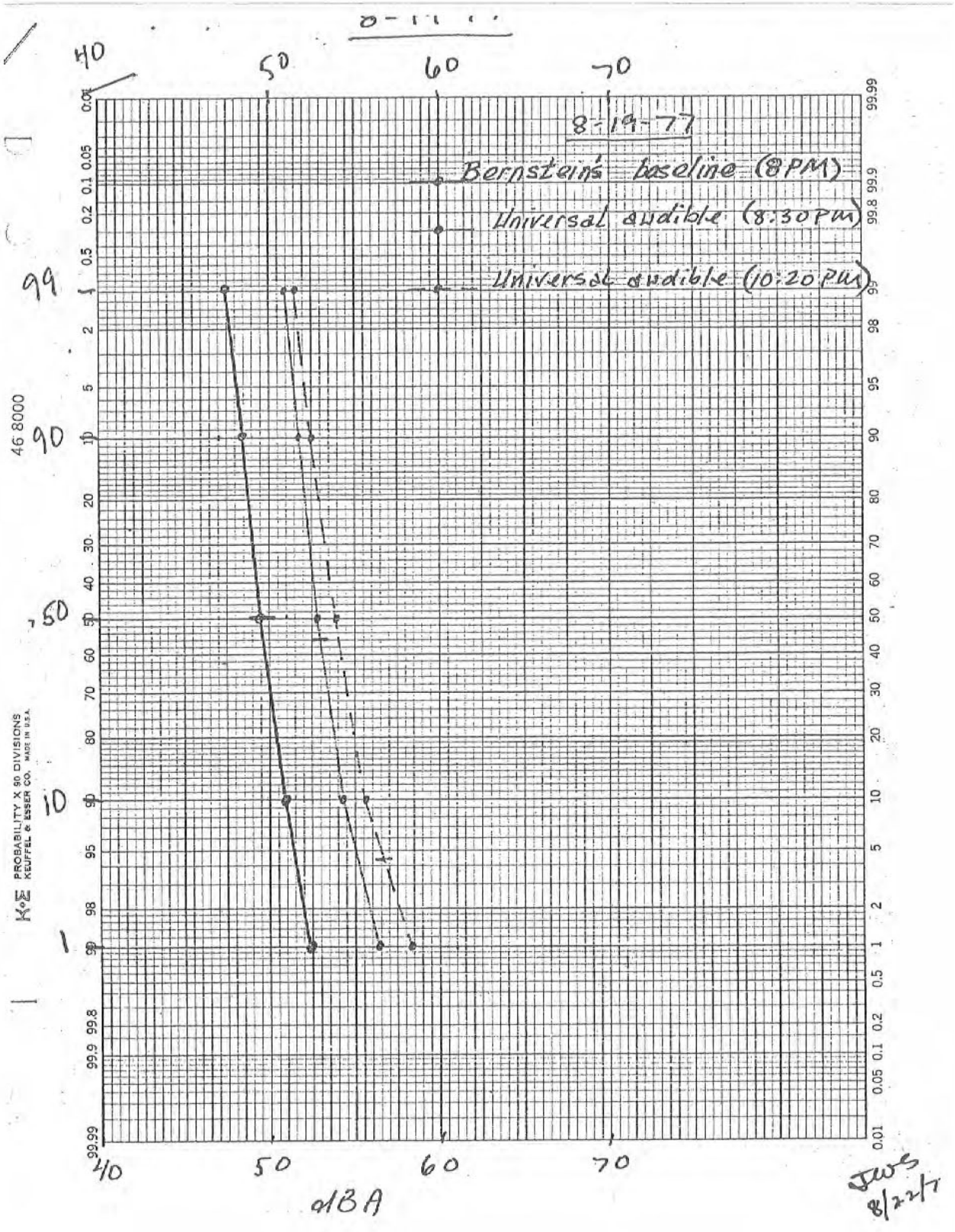
Comment letters submitted by the Campo de Cahuenga Historical Memorial Association, Coalition to Ban Billboard Blight, Communities United for Smart Growth, and Friends of the Los Angeles River, and responses thereto, are included in this Final EIR. Please refer to Comment Letter Nos. 38, 32, 39, and 43, respectively, and the responses thereto.

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 37-50

See following page


Legend
HKR-1 Noise Receptor Location
(See Table IV.D-6 for the elements of each location)
Figure 93
Noise Receptor Locations
Page 8/13
matrix environmental
101
134
area of topographic constraint formed


8-19-77
Bernstein's baseline (8PM)
Universal audible (8:30PM)
Universal audible (10:20PM)
40
50
60
70
dBA
99
90
50
10
1
PROBABILITY X 50 DIVISIONS
KEUFFEL & ESSER CO. MADE IN U.S.A.
JWS
8/22/77

Response to Comment No. 37-50

The attachment that is presented as Comment No. 37-50 was referenced in Comment No. 37-38 and responded to therein. The commenter is referred to Response to Comment No. 37-38, above. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment Letter No. 38

Deuk Perrin
President
Campo de Cahuenga Historical Memorial Association
P.O. Box 956
North Hollywood, CA 91601
deuk_perrin@hotmail.com

[Note: Duplicates of the letter provided below were received on 2/2/11 and 2/4/11]

Comment No. 38-1

I have reviewed the Draft Environmental Impact Report (DEIR) for the proposed NBC Universal Evolution Plan. I represent the Campo de Cahuenga Historical Memorial Association. The historic Campo de Cahuenga is located adjacent to this Project across the street on the west side of Lankershim Bl. Despite the rhetoric in the DEIR of our proximity not being a question, the Campo is impacted by this Project as it is by the Metro Universal DEIR. Therefore I submit the following comments to be made a part of the official record and the Final EIR.

Response to Comment No. 38-1

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project. Specific comments regarding the Draft EIR are provided and responded to below.

Comment No. 38-2

TRANSPORTATION

Question:

1. Where is the information that LADOT asked for at the Scoping Meeting in February, 2007 on financial costs, funding sources, and financing; sequence and scheduling considerations, implementation responsibilities, controls, and monitoring of appropriate mitigation measures?

Response to Comment No. 38-2

The CEQA Guidelines require that an EIR focus on the physical impacts of the proposed Project. Financial costs are an issue under CEQA only with regard to assessing the feasibility of mitigation measures. Thus, the Applicant is not required to identify the

financial costs of the improvement program during the environmental review process. However, as described in Section IV.B.1.5 of the Draft EIR and Chapter V of the Transportation Study for the NBC Universal Evolution Plan Environmental Impact Report (Gibson Transportation Consulting, Inc. and Raju Associates, Inc., March 2010) (the "Transportation Study"), the Project would be responsible for the funding and financing of all project design features and the regional and sub-regional highway improvements, specific intersection improvements, system-wide signal system upgrade, and transit improvements required as part of the Project's approvals.

The Applicant has provided information regarding the mitigation phasing program to the Los Angeles Department of Transportation (LADOT). The proposed phasing plan has been approved by LADOT and is included in the City of Los Angeles Department of Transportation's Assessment Letter dated April 2, 2010. (Draft EIR, Appendix E-2.) The implementation of the proposed mitigation measures would be monitored by LADOT per their standard procedures employed in other development projects in the City of Los Angeles.

Table 28 of the Transportation Study summarizes the proposed Transportation Improvement and Mitigation Phasing Plan.

Comment No. 38-3

TRAFFIC IMPROVEMENTS

The Specific Plan requires a phasing plan as part of the Substantial Compliance Analysis approval for the first Project developed under the Specific Plan. The Applicant submits a Traffic Mitigation Phasing Plan (TMPP) to the Department of Transportation for approval. There is a guarantee prior to the issuance of a building permit, which can be satisfied by a letter of credit or surety bond. If the transportation improvement is unfeasible, then an equivalent effective modification can be made and agreed upon.

The primary focus of Transportation Improvement Phasing in the DEIR is discussed in terms of providing a plan that requires the implementation of transportation improvements in tandem with the traffic impacts of the development.

Question:

1. Why is this approach taken of scheduling the implementation of the transportation improvement in tandem with the needed traffic improvement and not the more pragmatic approach of not allowing the next phase to begin construction until the traffic improvement is completely built and proves to provide the relief needed by the additional development?

2. Alternative means of satisfying a guarantee prior to the issuance of a building permit should not be by a letter of credit or surety bond. Should a developer be relieved of their responsibility of providing the needed and called for mitigation measure before proceeding with the next phase of development?

Response to Comment No. 38-3

As noted in Section IV.B.1.2.c.(2) of the Draft EIR, the analysis presented in the Draft EIR is based on a detailed travel demand forecasting model, the Universal City Transportation Model, that was developed for the Study Area using the Southern California Association of Governments' Regional Transportation Plan 2004 Transportation Model and the City of Los Angeles' General Plan Framework model as the base:

The City's model network was modified to include the following:

"1. Network detail (to add all directional ramps, collector streets in addition to the City's network of freeways, and major and minor arterials in the Study Area, and update link characteristics such as number of lanes, capacity, and speed parameters).

2. Traffic Analysis Zone system refinements to include more detail in the Study Area in order to obtain improved travel forecasts.

3. Updated network assignment features to simulate traffic patterns very close to actual traffic patterns observed in traffic counts.

These model modifications were included to offer more detailed and reliable future traffic forecasts in the Study Area. Existing conditions were simulated using the model, and the results of the traffic flows were compared to existing traffic counts. The model parameters were calibrated within three percent of the existing traffic counts, in compliance with City of Los Angeles Department of Transportation standards. Detailed descriptions of the model development and calibration/validation processes are provided in Appendix H of the Transportation Study dated March 2010 included in Appendix E-1 of this Draft EIR."

The Universal City Transportation Model was developed and calibrated/validated to the satisfaction of the City of Los Angeles Department of Transportation. Similar to analysis conducted with the Southern California Association of Governments' regional model, the analysis accounts for the unique nature of the street system within and around the Study Area, and the traffic conditions on both the freeway and street networks. The traffic volumes were assigned to the intersections and streets after a thorough investigation of traffic patterns and in collaboration with the City of Los Angeles Department of Transportation and Caltrans. The Universal City Transportation Model assignments of Project traffic account for the traffic volumes and operating conditions on the freeway system and route Project traffic based on the shortest time paths that reflect traffic

congestion. The commenter is referred to Appendix H of the Transportation Study (see Appendix E-1 of the Draft EIR) that provides a detailed description of the Universal City Transportation Model's development and validation process.

The transportation mitigation phasing plan for the Project has been developed using standard LADOT procedures that have been utilized for other development projects across the City of Los Angeles. Development on the Project Site is therefore tied to the Applicant's commitment of providing funding for the proposed mitigation program. As noted in the City of Los Angeles Department of Transportation's Assessment Letter dated April 2, 2010 (see Appendix E-2 of the Draft EIR):

> "Prior to the issuance of any building permit for each sub-phase, all on- and off-site mitigation measures for the sub-phase shall be complete or suitably guaranteed to the satisfaction of LADOT."
>
> and
>
> "Prior to the issuance of any temporary or permanent Certificate of Occupancy in the final sub-phase, all required improvements in the entire mitigation phasing plan shall be funded, completed, or resolved to the satisfaction of LADOT."

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 38-4

HOUSING

Questions:

1. One of the Project Objectives and Overall Goals is to provide new housing opportunities in proximity to jobs and adjacent to a Metro Rail Station. The 2,937 dwelling units in the City of Los Angeles Specific Plan are located two miles distant, over hilly terrain from the nearest Metro Station.

2. Where is there housing located within feet, not miles of a Metro Rail Station in keeping with guidelines set by MTA and the City's General Plan?

3. Why does the Project not meet the planning guidelines and ordinances set by the City of Los Angeles and MTA that promote residential proximity to public transportation?

Response to Comment No. 38-4

The possibility of locating residential development on the west side of the Project Site along Lankershim Boulevard was considered as a potential alternative to the proposed Project. As concluded on pages 2158–2159 of the Draft EIR, the impacts associated with this alternative outweigh the benefits of creating a transit-oriented development on the west side of the Project Site. Specifically, this potential alternative would create a new significant impact with regard to land use compatibility while also worsening the Project's significant impacts. In addition, this alternative fails to meet a number of the basic objectives of the Project. For these reasons, both individually and collectively, an alternative calling for residential development along Lankershim Boulevard was concluded to be infeasible.

Furthermore, the proposed Project's residential component would be located in proximity to transit stations, along transit corridors, and within high activity areas. An on-site Transit Center is proposed within the northern portion of the Mixed-Use Residential Area, near the junction of Lakeside Plaza Drive and the North-South Road. Additionally, a new shuttle service would provide transport through the Project Site that would connect the Project's residential community with the Universal City Metro Red Line Station, with connections to other publicly accessible parts of the Project Site (e.g., Universal CityWalk). The shuttle system is proposed to provide approximately 15-minute headways during the morning and afternoon peak hours and 30-minute headways during the off-peak hours. As described in Mitigation Measure B-2 in Section IV.B.1, Traffic/Access – Traffic/Circulation, three shuttle routes are proposed as part of the shuttle system, including:

- Shuttle from Lakeside Plaza Drive Transit Center to Universal City Metro Red Line Station—This shuttle shall primarily provide the residents in the Mixed-Use Residential Area with a connection to the Universal City Metro Red Line Station with stops adjacent to the Theme Park and CityWalk. The shuttle would travel along the North-South Road with stops at four to five locations and then via Universal Hollywood Drive to the Universal City Metro Red Line Station.

- Shuttle from Lakeside Plaza Drive Transit Center to Downtown Burbank Metrolink Station/Burbank Media District -- This shuttle would provide a connection from the Project Site to the Downtown Burbank Metrolink Station and the Burbank Media District.

- Shuttle from Lakeside Plaza Drive Transit Center to Hollywood/West Hollywood—This shuttle would provide a connection from the Project Site to West Hollywood and parts of Hollywood west of Highland Avenue that are farther away from the Hollywood/Highland Metro Red Line Station.

The shuttle route from Lakeside Plaza Drive to the Universal City Metro Red Line Station would include four to five stops along the North-South Road to provide residents along the entire Mixed-Use Residential Area with a stop located within a convenient

walking distance. As noted in City of Los Angeles Department of Transportation's Assessment Letter dated April 2, 2010 (see Appendix E-2 of the Draft EIR), the Applicant would work with Metro, the Los Angeles Department of Transportation, and the City of Burbank staff to ensure that the proposed shuttle routes and timing meet the demands and needs of employees and residents at the time of deployment of the shuttle system:

> "The applicant shall work with DOT, Metro and neighboring cities when developing the final shuttle routes and stop locations prior to implementation of the shuttle program. Also, to maximize the benefits of the shuttle program, the routes, stops, headways and hours of operation should be revisited periodically after deployment of the shuttle program to determine if the program can be improved consistent with the financial commitment guaranteed by the Applicant for a minimum of 20 years."

The provision of the shuttle system is intended to directly link the proposed Mixed-Use Residential Area homes to the Universal City Metro Red Line Station. Additionally, as mentioned earlier in this response, the easterly location of the residential portion of the Project puts the residents closer to the many entertainment-related jobs in the Burbank Media District and in Hollywood. The proposed shuttle system would operate similar to the LADOT Downtown Area Shuttle, thereby providing a viable and convenient alternative to automobile travel for residents, employees, and patrons of the Project.

Additionally, the proposed Project includes a Transportation Demand Management Program to encourage use of transit by Project users. As described in Section IV.B.1, Traffic/Access – Traffic/Circulation, the Project would develop and implement a Transportation Demand Management Program that would include various strategies. See Topical Response No. 4: Transportation Demand Management Program (see Section III.C, Topical Responses, of this Final EIR).

The Project would address housing needs that are currently unmet and are contributing to urban sprawl and associated automobile trip emissions which are in conflict with SCAG's regional planning efforts and the South Coast Air Quality Management District; Air Quality Management Plan. The Project would also bring more housing units closer to major employment centers. This additional density would be located in an area currently served by public transit, and would be located near existing transportation corridors. The Project's proposed multi-family units provide housing closer to jobs at densities that are consistent with the Vehicle Miles Traveled reduction strategies set forth in the above mentioned regional planning documents. (Draft EIR, Table 191, page 2069). The proposed Project would also not be inconsistent with the Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan's policies to locate high density residential development near a commercial center (i.e., the Project Site is a designated regional center), rail transit stations, and major bus routes. (Draft EIR, page 507.) As discussed in

Section IV.A.1, Land Use – Land Use Plans/Zoning, of the Draft EIR, with implementation of the identified design features, and upon approval of the requested actions, the proposed Project would not be inconsistent with the City or County General Plan or other adopted environmental goals contained in other applicable plans.

Comment No. 38-5

ADJACENT PROJECTS

The DEIR talks about physical boundaries that separate the Project from adjacent communities and therefore lessens the impact significantly. However, most environmental issues go beyond physical boundaries to increase the damage if not mitigated.

Question:

1. Why is this well known fact not incorporated throughout the DEIR and addressed?

Response to Comment No. 38-5

The comment's suggestion that the Draft EIR's environmental analyses are limited by the cited physical boundaries is incorrect. The analysis of the proposed Project's impact on off-site locations is fundamental to the Draft EIR and is addressed throughout each of the environmental issues areas. The study area for each individual environmental impact issue is responsive to the geographic area within which the impacts could occur. With respect to potential impacts to surrounding uses, the range and scope of analysis varies depending on the environmental issue as some issues have greater (or less) potential to impact immediately adjacent uses and others may have greater (or less) potential to impact more distant uses. For example, potential geotechnical impacts are typically more localized; whereas, potential climate change impacts have the broadest of implications; i.e., global. The specific boundaries for the study area used in each analysis is set forth within each environmental issue presented in Section IV, Environmental Impact Analysis, of the Draft EIR.

Comment No. 38-6

RELATED PROJECTS

Questions:

1. Why are unavoidable unmitigated impacts of other related projects not evaluated as to their cumulative effects on the Evolution Project? Very little information is given in the Transportation Improvement Phasing Section as referenced by page 228 in Appendix E of Volume 8 of the DEIR.

2. Related Projects like the Universal MTA Project are not considered as to what happens to the Evolution Plan's mitigations measures if the Universal MTA Project is delayed or does not get built and those project improvements are not needed. Why?

Response to Comment No. 38-6

Cumulative impacts are defined as "two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts." (CEQA Guidelines Section 15355.) The analysis of cumulative impacts need not be as in-depth as what is performed relative to the proposed project, but instead is to "be guided by the standards of practicality and reasonableness" (CEQA Guidelines Section 15130b). Typically, if a project would not contribute to the cumulative conditions of related projects, cumulative impacts of a project would be considered less than significant. Further information regarding the basis for the Project's cumulative analysis is set forth in Section III.B, Basis for Cumulative Impact Analysis, of the Draft EIR. Each Section of the Draft EIR that analyzes an environmental issue area contains a discussion of potential cumulative impacts that could occur as a result of the proposed Project and the identified related projects.

With specific regard to cumulative traffic conditions, the analysis presented in the Draft EIR and Transportation Study do account for cumulative projects within and around the Study Area. A total of 256 related projects were included in the list of related projects used in all future scenarios. Similar to the other 255 related projects within the 50 square mile Study Area for the Project, the proposed Metro Universal project (described by the commenter as the "Universal MTA project") was included in the traffic impact analyses presented in the Transportation Study. As shown on Figure 52 and Table 26 in Section IV.B.1 of the Draft EIR and Figure 15 and noted in Table 10 in Chapter III of the Transportation Study, the traffic from the proposed Metro Universal project (Related Project No. 65) was included in all future traffic volume projections. The Project's impacts have been determined based on future conditions that include traffic from the 256 related projects and other developed proposals and growth included in the Southern California Association of Government's (SCAG) regional transportation model. (Draft EIR, Section IV.B.1.2.c.(1).)

The commenter is referred to Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, of this Final EIR), regarding the Metro Universal project.

Comment No. 38-7

3. The two related projects, the Universal MTA Project and the Evolution Project add immensely to the regional transportation needs of the area. Yet, the DEIR points out that

NBC Universal is not responsible to fund nor build the $200 to $300 million in freeway improvements. They are only responsible to pay $15 million to make the improvements "shovel ready". Who is going to pay for the freeway improvements? Currently the DEIR indicates that the environmental issue is unmitigatable.

Response to Comment No. 38-7

The comment refers to the US 101 corridor regional improvements identified in Appendix O of the Transportation Study. (Draft EIR, Appendix E-1.) As noted in Appendix O, the Applicant has worked with the California Department of Transportation (Caltrans) to identify the US 101 corridor regional freeway improvements that would provide benefits to the regional transportation system. Since these US 101 corridor improvements currently do not have committed funding, the analysis presented in Section IV.B.1, Traffic/Access – Traffic/Circulation, of the Draft EIR and Chapters V and VI of the Transportation Study conservatively assumes that these regional improvements would not be in place in the year 2030. The Project would contribute its fair-share of these regional improvements, but it is not responsible for their full implementation. Therefore, the Draft EIR does not account for any benefits from these regional improvements as a part of the Project mitigation program.

The Project, however, is responsible for implementing the freeway and street improvements required as part of the Project's approval. The Project is fully responsible for the cost of the implementation of the required freeway, interchange, and street improvements, and the development of subsequent phases of the Project is dependent on having these improvements in place at the appropriate time. The recommended freeway mitigation measures include:

- US 101 southbound on-ramp at Universal Studios Boulevard (see Mitigation Measure B-3 of the Draft EIR);
- US 101 interchange improvements at Universal Terrace Parkway (Campo de Cahuenga Way) (see Mitigation Measure B-4 of the Draft EIR); and
- Specific intersection improvements at freeway ramp locations that have been identified in Section IV.B.1.5.(2) of the Draft EIR and Chapter V of the Transportation Study.

Therefore, since the Project's traffic impact analysis does not take credit for any benefits resulting from the US 101 corridor regional improvements identified in Appendix O of the Transportation Study (see Appendix E-1 of the Draft EIR), the Project's entitlement is not contingent on their implementation. Based on an agreement with Caltrans, the Applicant would fund the preparation of the environmental documents for the regional freeway improvements. Refer to Caltrans' traffic assessment letter dated February 3,

2011, and Topical Response No. 6: Freeway Improvements (see Section III.C, Topical Responses, of this Final EIR) for additional detail.

Comment No. 38-8

TDM PROGRAM

Questions:

1. What is the planned Transportation Demand Management Program (TDM) for the Project?

2. How is it phased with the development of the Project?

3. How long is it planned to be in operation?

4. Who will be involved (which employer) in managing the TDM?

5. Who is going to manage and operate the Transportation Management Association?

6. Where is the funding for the TDM coming from?

Response to Comment No. 38-8

As described in Project Design Feature B-1 in Section IV.B.1, Traffic/Access – Traffic/Circulation of the Draft EIR, the Project would develop and implement a Transportation Demand Management (TDM) Program. Refer to Topical Response No. 4: Transportation Demand Management Program (see Section III.C, Topical Responses, of this Final EIR), for additional information regarding the strategies to be addressed in the proposed Project's TDM Program.

The TDM Program would be phased according to the approved transportation mitigation phasing plan (see the City of Los Angeles Department of Transportation's Assessment Letter dated April 2, 2010, included as Appendix E-2 of the Draft EIR), and would be provided for the life of the Project. The TDM Program would be funded and managed by the Applicant and/or its successors.

Regarding the Transportation Management Association (TMA), as mentioned in Chapter V of the Transportation Study, a TMA will be formed on-site for the Project or if possible, the Project would become a part of an existing TMA in the Study Area.

If the Applicant decides to join an existing TMA in the Study Area, such as the North Hollywood TMA or the Burbank TMA, the Applicant would pay the applicable fees to the TMA. In the event that the Applicant decides to start a new TMA on the site, the Applicant would fund all of the costs of the TMA. The decision to join an existing TMA or to start a

new TMA on-site would be based on the needs of the Project patrons, employees, and residents at the time of the TDM Program's deployment.

Comment No. 38-9

PROJECT PHASING

Project Phasing is talked about by representatives of NBC Universal as a means to ensure that run-away development is not rampant without the successful mitigation of additional infrastructure to handle the increase of development completed for the next phase. The NBC Evolution Plan has a 20 year horizon where more information is needed now during the environmental review when mitigations are being worked out.

Question:

1. Why is there no development phasing strategy in the DEIR that indicates when the next phase of Project development will begin based on the successful mitigation of such environmental issues as regional and local transportation issues, traffic and circulation, water, air quality, solid waste issues?

Response to Comment No. 38-9

The Draft EIR analyzes potential impacts of the proposed Project, pursuant to CEQA. The implications of Project phasing are addressed through the structure of the mitigation measures and project design features incorporated into each section of the Draft EIR. Furthermore, the Project's MMRP, sets forth the timing for the implementation of each of the mitigation measures and project design features proposed for the Project. Additionally, given the overall importance of the Project's transportation improvements, the transportation improvements have been organized in a subphasing plan that addresses the timing and sequencing of these mitigation measures.

As noted in Section IV.B.1.5.n of the Draft EIR and Chapter V of the Transportation Study, similar to other development proposals in the City of Los Angeles, the Project's transportation mitigation phasing plan has been developed using trips as thresholds. The Project has been preliminarily divided into four development phases with traffic mitigations tied to each phase and the implementation of mitigations prior to development proposed in subsequent phases. The primary focus of this sub-phasing analysis is to provide a plan that requires the implementation of transportation improvements in tandem with the traffic impacts of the development. The trip generation of each phase of development would be monitored by LADOT. As noted in Table 28 in Chapter V of the Transportation Study:

> "Prior to the issuance of any building permit for each sub-phase, all on- and off-site mitigation measures for the sub-phase shall be complete or suitably guaranteed to the satisfaction of LADOT."

Comment No. 38-10

MITIGATION MONITORING AND REPORTING

Question:

1. Why are Mitigation Monitoring and Reporting Programs (MMRP) going to be provided as a part of the FEIR and not the DEIR? The Communities need to review and comment on these Programs.

Response to Comment No. 38-10

CEQA does not require the mitigation monitoring program to be circulated with or included in the Draft EIR. CEQA Guidelines Section 15097 (Mitigation Monitoring or Reporting) and CEQA Section 21081.6 require that an MMRP must be adopted by the lead agency when making the findings required for approving or carrying out a project. In accordance with CEQA, if the decision-makers decide to make the findings for approval of the Project, the MMRP will be adopted by the City of Los Angeles. In addition, consistent with the standard practice for Draft EIRs in the City of Los Angeles, the proposed project design features and recommended mitigation measures are set forth within each environmental impact analysis in Section IV of the Draft EIR and in Section I, Introduction/ Summary, of the Draft EIR.

Comment No. 38-11

ALTERNATIVE 9 – EAST/WEST ROAD WITH FORMAN AVENUE EXTENSION

CEQA calls for “feasible alternatives to be considered”. Alternative 9 is NOT a feasible alternative.

To plot a Secondary Highway through a historic golf course and single- family neighborhood is pure folly.

Questions:

1. The County Highway Plan may show a road but I would ask when the Plan was updated to reflect current land uses?

Such Plans need to be updated to be consistent with existing land use and existing transportation circulation patterns. Where inconsistent uses exist confusion and litigation usually follow.

2. Why does the DEIR not show Alternative 9’s extended roadway proposals for a sensible evaluation of the associated impacts.

Response to Comment No. 38-11

The comment addresses Alternative 9 as analyzed in Section V, Alternatives to the Proposed Project, of the Draft EIR. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

The comment provides an accurate summary of the Draft EIR's analysis of the impacts of Alternatives 8 and 9, collectively referred to as the East-West Road Alternatives. Alternative 8 analyzes the East-West Road between Barham and Lankershim Boulevards, and Alternative 9 includes the East-West Road with Forman Avenue Extension (Section V.I, Alternatives to the Proposed Project, of the Draft EIR). As discussed in more detail in Topical Response No. 10: East-West Road Alternatives (see Section III.C, Topical Responses, of this Final EIR), the East-West Road Alternatives are feasible alternatives pursuant to Section 15126.6 of the CEQA Guidelines. The purpose for analyzing these alternatives is to evaluate the Project's requested deletion of the East-West Road from the existing County Highway Plan. The County of Los Angeles, as part of its General Plan Update program, has also proposed deleting the East-West Road from the County Highway Plan. Please see Topical Response No. 10: East-West Road Alternatives (see Section III.C, Topical Responses, of this Final EIR) for further information.

Comment No. 38-12

DEIR PROJECT ALTERNATIVE #10

Alternative #10 - NBC Universal Evolution Plan

The Contract of Sale and Escrow Instructions entered into on December 22, 1994 between the Los Angeles County Metropolitan Transportation Authority (MTA) and MCA, Inc and the subsequent Memorandum of Understanding (MOU) dated February 25, 1994 establishes procedures for Joint Development Uses and a right of first offer. The Initial Offer has certain time restrictions in which both parties must act.

Questions:

1. Have the all [sic] terms and conditions of the above agreements been met in a timely manner?

2. Is MCA, Inc [sic] still the owner in part in the parcels identified in the above Contract of Sale?

Response to Comment No. 38-12

The comment raises questions regarding contracts related to the Metro property located on the west side of Lankershim Boulevard and not the Project Site. The comment does not address the environmental analysis in the Draft EIR. The comment is noted has been be incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 38-13

If MCA, Inc [sic] is an owner of the above parcels, then the NBC Universal Evolution Plan and the Metro Universal Project can be combined into one multi-phase Project. The two DEIRs can be combined which will more effectively evaluate issues of environmental impacts affecting the immediate area. Feasible alternatives can be re-evaluated and new ones added.

Response to Comment No. 38-13

As noted in the Project Description of the Draft EIR, the proposed Metro Universal project at the Universal City Metro Red Line Station site was an independent development project and not part of the proposed Project. As such, pursuant to Section 15130 of the *CEQA Guidelines*, in this EIR the proposed Metro Universal project was classified as a related project and per the *CEQA Guidelines*, was addressed in the analysis of cumulative impacts within each environmental issue included in Section IV, Environmental Impact Analysis, of the Draft EIR. (Draft EIR, page 269.) Please see Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, in this Final EIR), regarding the Metro Universal project.

Comment No. 38-14

One such alternative that could be considered with the two plans combined would be the MTA Riverwalk Alternative, put forth by Communities United For Smart Growth (CUSG). This plan proposed hotel and studio facilities on Universal's property as well as a housing component located on the MTA site, closer to the actual MTA Metro station. This Alternative would then become Alternative 10.

Question:

3. What are the reasons the Riverwalk Plan should not be an Alternative in the Evolution DEIR?

Response to Comment No. 38-14

As discussed in Section V.A.4 of the Draft EIR, the RiverWalk was considered as an alternative to the Project and rejected as infeasible. Table 211 on page 2156 of the Draft EIR presents a summary of the RiverWalk and a comparison of the development included in the RiverWalk with the proposed Project. As noted on page 2155 of the Draft EIR, "RiverWalk calls for the addition of 345,000 square feet of office space, 30,000 square feet of retail/restaurant uses, and 200 to 600 residential units on the Project Site. In comparison to the proposed Project, the RiverWalk does not include the development of any additional studio, studio office, entertainment, entertainment retail, or amphitheater replacement uses. In addition, the RiverWalk includes 205,000 less square feet of office space (i.e., 550,000 square feet under the proposed Project versus 345,000 square feet of office uses under the RiverWalk), 150,000 less square feet of retail/restaurant floor area (i.e., 180,000 square feet under the proposed Project versus 30,000 square feet of retail/restaurant uses under the RiverWalk plan), and 2,337 to 2,737 fewer residential units (i.e., 2,937 residential units under the proposed Project versus 200 to 600 residential units under the RiverWalk)." Importantly, the RiverWalk also would result in the demolition of close to 240,000 square feet of existing uses and 779 parking spaces, which would impact operations on the Project Site. Several uses on the northern portion of the Project Site would be significantly affected by the RiverWalk.

As discussed on pages 2155–2156 of the Draft EIR, the RiverWalk was determined to be an infeasible alternative for the reasons above and for the fact that it fails to meet most of the Project objectives; for those that it does meet, the RiverWalk is consistent at a level that is below that of the proposed Project. For example, the RiverWalk "fails to expand existing on-site motion picture, television production, and entertainment facilities and enhance the Project Site's role in the entertainment industry by meeting the growing and changing needs of the industry. In addition, RiverWalk would not meet the Project's objective of continuing the tradition of outdoor uses, or to maximize opportunities for the local and regional economy or enhance the identity of the Project Site as an entertainment and media-oriented commercial district. In addition, RiverWalk would advance to a lesser degree adopted land use and transportation policies that ultimately decrease dependency on the automobile with resultant traffic, air quality and noise benefits…." (Draft EIR, Section V, Alternatives, pages 2155–2156.) Lastly, the RiverWalk would not "maximize the efficient use of the Project Site to meet regional housing needs."

The RiverWalk proposes development for a property independent of the Project Site and proposes a site plan that would result in demolition of existing uses on the site without regard to its impact on existing operations. The RiverWalk fails to consider site suitability, economic viability, and independent ownership/control of the two properties the RiverWalk plan encompasses. For these reasons, the RiverWalk is infeasible and was properly

rejected by the Draft EIR per CEQA Guidelines, Sections 15126.6(a) and 15126.6(g)(1). Further, an EIR "need examine in detail only the [alternatives] that the lead agency determines could feasibly attain most of the basic objectives of the project." (CEQA Guidelines, Section 15126.6(f).) Thus, regardless of whether some impacts may be reduced under the RiverWalk plan, because the RiverWalk fails to meet the majority of the Project's objectives, it was properly rejected in the Draft EIR.

Comment No. 38-15

SIGN PROGRAM IN THE CITY OF LOS ANGELES SPECIFIC PLAN

The proposed City of Los Angeles Specific Plan includes the area of the residential and town center component of the Evolution Plan (1 A & B), the Studio Administration area (2A), the Lankershim edge (2B), the Universal City Southern Entry Point (2C), and a few smaller areas. The remainder of the project property is covered by the Universal Studios Specific Plan in Los Angeles County.

The more questionable types of signs that include motion, translucent graphics, inflatable's [sic] permitted and the number allowed (#):

Animated Sign - 2A, 2C

Billboard - 2C

Building Wrap Sign –

Captive Balloon Sign –

Electronic Message Sign - 2A, 2C

Entertainment Sign - 1A & B (7), 2A (12), 2B (5)

Inflatable Sign –

Off-and On-Site Signs - 2C

Projected Sign - 2A

Street Banners-Private and Public - 1A & B (2 private and unlimited public), 2A (same as 1)

Supergraphic Sign - 2A (3), 2B (1)

Questions:

1. Why are Building Wrap, Captive Balloon, and Inflatable signs listed and defined if there are none permitted in the Specific Plan Area?

Response to Comment No. 38-15

The comment does not address the environmental analysis in the Draft EIR. Nonetheless, generally the comment accurately describes the sign districts of the proposed Universal City Specific Plan that would be located within the City portions of the Project Site and of the proposed Universal Studios Specific Plan that would be located within the County portions of the Project Site, except that Sign District 2B within the City is the Studio Technical Lot Sign District rather than the Lankershim Edge Sign District. The comment also summarizes some of the sign categories and sign types that would be allowed in the sign districts in the proposed Universal City Specific Plan. For clarification, the listing of sign types and categories in the comment does not accurately reflect all of the proposed permitted signs under the proposed City Specific Plan. The comment also questions why Building Wrap, Captive Balloon and Inflatable Signs are listed and defined if not permitted in the proposed City Specific Plan area. Building Wrap Signs are defined because they would be expressly prohibited in Sign District 1A and 1B, Captive Balloon Signs are a form of Inflatable Signs and those would be permitted as a type of Temporary Sign. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 38-16

2. Is the Lankershim Edge Sign District in the County's Universal Studios Specific Plan the same area of 2B above in the City's Specific Plan? Why?

Response to Comment No. 38-16

As stated in Response No. 38-15, above, the Lankershim Edge Sign District in the proposed County Specific Plan is not the same area as the Studio Technical Lot Sign District (Sign District 2B) in the proposed City Specific Plan. The location of the proposed Lankershim Edge Sign District is shown in Figure 19 on page 317 of the Draft EIR and the location of the proposed Studio Technical Lot Sign District (2B) is shown in Figure 20 on page 323 of the Draft EIR. The sign districts are different because they govern different geographic areas of the Project Site that are in different jurisdictions. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 38-17

3. The sign area calculation is very specifically defined. Why?

Response to Comment No. 38-17

The comment does not address the environmental analysis in the Draft EIR. Nonetheless, the comment correctly states that a specific definition for sign area is provided in the proposed Specific Plans. The sign area definition proposed is to provide a clear and consistent method of calculation for sign area within the Project Site. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 38-18

IMPORT/EXPORT OF EARTH

A total of 450,000 cubic yards of import or export of earth is identified in the City of Los Angeles Specific Plan area. This does not include movement of dirt within the Specific Plan area nor the Universal Studios Specific Plan area.

Question:

1. Why is this approach used since dirt will be moved around the site to make new contours for the anticipated development?

Response to Comment No. 38-18

The 450,000 cubic yards is referenced because it is the maximum total combined amount of earth material permitted to be imported and/or exported from the City Specific Plan area under the proposed City Specific Plan. However, the analyses in the Draft EIR, including the Project's air quality and noise analyses (see Sections IV.H and IV.C, respectively, of the Draft EIR) address the potential impacts of all movement of earth materials within the Project Site, not just the import/export of such materials.

Comment No. 38-19

MIXED USES - CITY OF LOS ANGELES SPECIFIC PLAN

Uses in the Mixed-Use Universal City District:

Hotels
Dinner Theaters with no maximum seating specified
Theater and showcase theater with no maximum seating specified

Questions:

1. Is it anticipated that the storage for the entertainment attraction, displays, and equipment, production activities, production facilities, studio use and office, studio support

facilities, cellular and communications facilities are to be permitted in the Technical Support Overlay Sub District within the Mixed-Use Universal City District where the residential development is proposed?

2. Why is storage being allowed where residential is planned?

Response to Comment No. 38-19

The comment does not address the environmental analysis in the Draft EIR. Nonetheless, the comment correctly states that hotel, dinner theater, theater and showcase theater uses would be allowed within the proposed Universal City Specific Plan Mixed-Use Universal City District. The hotel use would be allowed pursuant to an Equivalency Transfer for residential uses as set forth in Subsection 3.11 of the proposed Universal City Specific Plan. A hotel would be limited to no more than 200,000 square feet of floor area and no more than 200 rooms. The other theater uses along with all other retail and community-serving uses would be limited to a total of 180,000 square feet of floor area as set forth in Table No. 1 in Section 3.3.A of the proposed Universal City Specific Plan. The comment is also correct that various storage uses would be allowed in the Technical Support Overlay Subdistrict, which would also allow residential uses as allowed generally in the Mixed-Use Universal City District. However, residential uses in this area are less likely as the primary intent at this time is to allow the existing Lakeside Plaza office building and Communication Facilities (including large satellite dishes) that are located in this area to remain. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 38-20

3. As the residential development subdivisions are built, it is anticipated that those above uses stored there will be moved? [sic] Where? Or is the residential use just imaginary?

Response to Comment No. 38-20

The comment does not address the environmental analysis in the Draft EIR. Nonetheless, as discussed in Response No. 38-19, above, residential uses within the Technical Support Overlay Subdistrict are less likely than the other uses that are allowed in the Subdistrict. However, since the proposed Universal City Specific Plan is a long range planning document that is intended to provide flexibility for the future, it allows for the possibility that other uses including residential as generally allowed in the Mixed-Use Universal City District may occur in the future. Under those circumstances, the possibility of relocation of the storage uses may occur. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 38-21

HEIGHT OF BUILDINGS - CITY OF LOS ANGELES SPECIFIC PLAN

Questions:

1. Height of structures is proposed to be 625 feet above MSL (mean sea level) in the Overlay Sub District. Are these buildings warehouses for movie, television, and entertainment equipment?

The above listed uses are also allowed in the Studio Production District which is located adjacent to the Freeway and adjacent to City Walk/existing Hotels entrance from Lankershim Bl and Campo de Cahuenga Way. Height of buildings here are 700 feet and 850 feet above MSL.

Response to Comment No. 38-21

The comment does not address the environmental analysis in the Draft EIR. Nonetheless, the comment correctly identifies some of the permitted land uses within the Technical Support Overlay Subdistrict and the Studio Production District of the proposed City Specific Plan.

Comment No. 38-22

2. What is the Universal Black Building height in feet above MSL?

Response to Comment No. 38-22

The comment does not address the environmental analysis in the Draft EIR. Nonetheless, by the "Universal Black Building," it is assumed that the commenter is referring to 10 Universal City Plaza which is a 36-story office tower located adjacent to the Project Site. As described on page 547, in Section IV.A.2, Land Use – Physical Land Use, of the Draft EIR, the 10 Universal City Plaza tower is described as follows: "…the 36-story, approximately 506 feet in height, 10 Universal City Plaza office building (formerly known as the Texaco Tower) located at the northeast corner of Lankershim Boulevard and the Hollywood Freeway with a top-of-building elevation of 1,089 feet above MSL…"

Comment No. 38-23

LAND USE EQUIVALENCY TRANSFERS - CITY OF LOS ANGELES SPECIFIC PLAN

Question:

1. Explain in greater detail what Land Use Equivalency Transfers are and how they apply to the Specific Plan? Give examples.

Response to Comment No. 38-23

As set forth in Section 3.11.A of the proposed City Specific Plan, land use equivalency transfers are "established to provide development flexibility by allowing shifts of permitted Floor Area from residential Dwelling Units to retail uses and/or hotel uses over the life of the Specific Plan, while maintaining the intent and regulatory requirements of the Specific Plan." As stated on pages 286 and 289 of the Draft EIR, and regulated via Section 3.11 of the proposed City Specific Plan, the Project's proposed equivalency program "defines a framework within which land uses can be exchanged for certain other permitted land uses so long as the limitations of the proposed Specific Plans are satisfied and no additional environmental impacts would occur above those addressed as part of the environmental review for the Project as set forth in this Draft EIR."

Within the proposed City Specific Plan area, the Equivalency Program within the Mixed-Use Residential Area is limited to only permit shifts of residential dwelling units to 50,000 square feet of retail uses and/or 200 hotel guest rooms (200,000 square feet of hotel floor area), utilizing factors that are based upon environmental impact equivalencies and if the new commercial use is otherwise permitted by the proposed City Specific Plan. To provide an example of how the equivalency procedures of the proposed City Specific Plan could be implemented, Alternative 7 (Environmental Equivalency Alternative) consists of an analysis of a hypothetical set of land use changes (refer to Section V, Alternatives to the Proposed Project, of the Draft EIR). Specifically, Alternative 7 changes 990 residential units to 49,000 square feet of retail uses and 200 hotel rooms.

Comment No. 38-24

UNIVERSAL STUDIOS SPECIFIC PLAN

The Universal Studios Specific Plan indicates that the Specific Plan area is surrounded on all sides by urban development (Page 7 of the Universal Studios Specific Plan). This is untrue since on the west side of the Specific Plan area is located Campo de Cahuenga Historical Site, Weddington Park, the Islands subdivision, and the MTA Universal Metro Station surface parking lots. This is hardly an urban setting.

The Specific Plan fails to mention the Campo de Cahuenga Historical Site, the most important site west of the Mississippi in United States history, to California becoming a State, and in the realization of Manifest Destiny.

The Campo is located across from Lankershim Bl; adjacent to the Universal Studios Urban Edge, the Universal Studios Business District, and the Lankershim Edge Sign District 1 of the County's Specific Plan. All of the comments and questions in this section of the Campo de Cahuenga Historical Memorial Association's comment letter on the DEIR pertain to the environmental impacts of the proposed associated development located within these Edge

and District boundaries. Within the Business District, most of the area is characterized by existing buildings with the exceptions of two new office buildings (0-1 and 0-2 as identified in the Specific Plan) proposed in proximity to the tee of Bluffside Dr. and Lankershim Bl. as it enters Universal private property at James Stewart Ave.

Response to Comment No. 38-24

The commenter asserts that the area around the Project Site is not "urban." Regarding the use of the term "urban" in the Draft EIR, the U.S. Census Bureau defines an urban area as: "Core census block groups or blocks that have a population density of at least 1,000 people per square mile (386 per square kilometer) and surrounding census blocks that have an overall density of at least 500 people per square mile (193 per square kilometer)."[52] The Sherman Oaks–Studio City–Toluca Lake–Cahuenga Pass Community Plan area had a population density of approximately 5,372 persons per square mile during the 2000 census, with an estimated density of approximately 5,855 persons per square mile in 2009.[53] The North Hollywood–Valley Village Community Plan area had a population density of approximately 12,783 persons per square mile during the 2000 census, with an estimated density of approximately 13,885 persons per square mile in 2009.[54] The Van Nuys–North Sherman Oaks Community Plan area had a population density of approximately 12,307 persons per square mile during the 2000 census, with an estimated density of approximately 12,891 persons per square mile in 2009.[55] The density in the Project area well exceeds the population density used by the U.S. Census Bureau to define urban areas. For this reason, the term "urban" was used throughout the EIR as it refers to the Project area.

The Campo de Cahuenga Historical Site is located outside of the boundaries of both the proposed Universal Studios Specific Plan and the proposed Universal City Specific Plan and, therefore, should not be included in the proposed Specific Plans. Potential impacts to the Campo de Cahuenga Historical Site are instead properly analyzed throughout the Draft EIR, most specifically in Section IV.J, Cultural Resources, but also in Draft EIR Section IV.C, Noise, and Section IV.D, Visual Resources, among others.

---

[52] *Census 2000 Urban and Rural Classification, U.S. Census Bureau, Geography Division, www.census.gov/geo/www/ua/ua_2k.html, Created: April 30, 2002, Last revised: December 03, 2009.*

[53] *Los Angeles Department of City Planning, Demographic Research Unit, CITY of LOS ANGELES, LOCAL POPULATION and HOUSING PROFILE, Sherman Oaks - Studio Cy Community Plan Area, May 2011.*

[54] *Los Angeles Department of City Planning, Demographic Research Unit, CITY of LOS ANGELES, LOCAL POPULATION and HOUSING PROFILE, N Hollywood - Valley Vlg Community Plan Area, May 2011.*

[55] *Los Angeles Department of City Planning, Demographic Research Unit, CITY of LOS ANGELES, LOCAL POPULATION and HOUSING PROFILE, Van Nuys Community Plan Area, May 2011.*

The comments are noted and have been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 38-25

LANKERSHIM BL CORRIDOR STREETCAPE [sic]

The existing Lew Wasserman Building office building is at 750 ft MSL approximately 200 feet above the existing and future grade. The new office building 0-1 is proposed to be 725 ft MSL approximately 155 feet above grade and the other new office building 0-2 is proposed to be 850 ft. MSL approximately 195 ft to 295 ft. above grade.

While it appears that the streetscape zone being proposed with security fencing and walls will demark the Studios it will certainly provide an "urban moat" dividing the east and west side of Lankershim BI. With the adjacent MTA Universal development proposed for the west side of the street, it seems that the two major Projects are planned to result in a lighted, flashing, wind blown [sic] horizon of lights and sound that will clearly result in an "urban moat" of automobiles traveling at dangerous speeds or not at all. Exhibit 3-6c is an illustration of an enhanced Lankershim streetscape program that shows fifteen autos traveling back and forth with flashing signs and a few pedestrians. This is totally unrealistic at any hour of the day or night [sic]

Question:

1. In what ways has the County considered how the Universal Studios Project and the adjacent Metro Universal Project impact Lankershim BI.?

Response to Comment No. 38-25

As explained on page 1106 of the Draft EIR, the Lankershim Boulevard edge of the Project Site is currently highly developed. The proposed Universal Studios Specific Plan includes a Conceptual Lankershim Streetscape Plan that would help provide an integrated streetscape design for the area. As shown on Exhibit 3-C of the proposed Universal Studios Specific Plan, the streetscape design intends to visually integrate public and private improvements so that the area between the Hollywood Freeway and the Los Angeles River Flood Control Channel will further define the Project Site. As buildings are constructed along the Lankershim Boulevard frontage, streetscape improvements would be implemented on the east side of Lankershim according to the Conceptual Lankershim Streetscape Plan. Thus, a landscaped environment consisting of street trees and sidewalk planting would be created.

The City and the County considered the potential for cumulative impacts involving the proposed Project and proposed Metro Universal project. Specifically, each Section of

the Draft EIR that analyzes an environmental issue area contains a discussion of potential cumulative impacts that could occur as a result of the proposed Project and identified related projects, including, but not limited to, the Metro Universal project (related Los Angeles Project No. 65), which is no longer proposed. With respect to the specific issues raised in the comment, refer to Draft EIR Sections IV.B.1, Traffic; IV.C, Noise; and IV.E.2, Artificial Light. With regard to the Metro Universal project, refer to Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, of this Final EIR).

Comment No. 38-26

SIGN PROGRAM IN THE COUNTY OF LOS ANGELES SPECIFIC PLAN

The most questionable types of signs allowed and the number allowed (#) (Page 50 of the SP):

Animated Sign (?) Construction/Contractor Signs with Animated and Electronic Messages are prohibited; additional limitations listed for directional facing number of foot candles, and time off

Electronic Message Sign - (2)

Entertainment Sign - (?)

Inflatable Sign - (?)

Projected Image Sign - (?)

Supergraphic Sign - (3), none located north of the intersection of Lankershim Bl. And James Stewart Ave.

Thematic Element-spheres, gateways, towers, sculptures - (?)

Questions:

1. Why are other undesirable signs defined but none are identified as permitted?

Response to Comment No. 38-26

The comment does not address the environmental analysis in the Draft EIR. Nonetheless, the proposed Universal Studios Specific Plan would regulate the number, type, and size of signs for the proposed County Specific Plan area. The comment's listing of some sign types and categories does not accurately reflect the proposed permitted signs under the proposed Specific Plan. As noted in Response No. 38-15, above, with respect to the proposed City Specific Plan signage regulations, some sign types are defined because the sign type is expressly prohibited in certain sign districts or because the sign type is

included within another permitted sign type. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 38-27

2. Are signs defined and permitted in the City's Specific Plan (Lankershim edge 2B) the same or in addition to as the above listed signs in the County's Specific Plan?

Response to Comment No. 38-27

The comment does not address the environmental analysis in the Draft EIR. Nonetheless, as stated in Response to Comment Nos. 38-15 and 38-16, above, the Lankershim Edge Sign District in the proposed County Specific Plan is not the same area as the Studio Technical Lot Sign District (Sign District 2B) in the proposed City Specific Plan. The location of the proposed Lankershim Edge Sign District is shown in Figure 19 on page 317 of the Draft EIR, and the location of the proposed Studio Technical Lot Sign District (2B) is shown in Figure 20 on page 323 of the Draft EIR. The sign districts are different because they govern different geographic areas of the Project Site that are in different jurisdictions. The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.

Comment No. 38-28

3. If added to, the total number in the Lankershim Corridor north or the intersection of Lankershim Bl. and James Stewart Ave., on the east side of the Boulevard would be :

Electron Message Signs - (2)

Supergraphic Signs - (4)

Entertainment Sign - (5)

Add this number to similar signs on the west side of Boulevard and:

4. Is this sign clutter? Does it distract from driving and add to the possibility of increased accidents?

Response to Comment No. 38-28

The proposed Universal Studios Specific Plan Sign District 1 (Lankershim Edge Sign District) and a small portion of the proposed Universal City Specific Plan Sign District 2A (Studio Administration Sign District) are located along Lankershim Boulevard.

Universal City Specific Plan Sign District 2A includes the portion of Lankershim Boulevard and Universal Hollywood Drive that serves as the main west entrance to CityWalk and the theme park. There is an existing electronic marquee sign at this location. The remainder of Sign District 2A is located along Universal Hollywood Drive and is primarily internal to the Project Site. The signs in Sign District 2A would be directed toward those motorists and pedestrians entering or already within the proposed Specific Plan area and would be part of the overall entertainment experience at Universal Studios. Motorists viewing most of these signs would be traveling at low rates of speed on the private, internal streets within this area. As such, the signage proposed for Sign District 2A is not anticipated to create a significant traffic safety impact.

While Universal Studios Specific Plan Sign District 1 and a small portion of Universal City Specific Plan Sign District 2A are located along Lankershim Boulevard, traffic along Lankershim Boulevard primarily serves commuters and visitors to Universal Studios. Commuters traveling Lankershim Boulevard regularly use the route and are accustomed to seeing the existing signage in and around the Universal City area and the Burbank Media District. The signage that would be permitted under the proposed Specific Plans is not anticipated to have significant impacts on traffic safety.

Most of the signs would be directed toward the visitors to CityWalk and the theme park and would provide information (e.g., directions) to these visitors and be part of the visitor experience.

Also refer to Topical Response No. 9: Signage and Traffic Safety (see Section III.C, Topical Responses, of this Final EIR).

With regard to the potential cumulative impacts with the Metro Universal project, please refer to Topical Response No. 3: Defining the Proposed Project (see Section III.C, Topical Responses, of this Final EIR).

Comment No. 38-29

Thank you for your attention to the concerns raised in this letter of a community neighbor. Should you have any questions, please contact me at (805) 578-9236 or deuk_perrin@hotmail.com.

Response to Comment No. 38-29

The comment is noted and has been incorporated into the Final EIR for review and consideration by the decision-makers prior to any action on the Project.