

**DEPARTMENT OF TRANSPORTATION**

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Governor's Office of Planning &amp; Research



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**Mar 22 2021****STATE CLEARINGHOUSE**

March 22, 2021

Lisa Frank  
City of Burbank, Community Development Department  
150 North Third Street  
Burbank, CA 91502

RE: Burbank Housing Element Update and  
Associated General Plan Updates –  
Recirculated Notice of Preparation of an  
Environmental Impact Report (NOP)  
SCH # 2021020393  
GTS # 07-LA-2021-03528  
Vic. LA-5/PM: 29.126

Dear Lisa Frank:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced recirculated NOP. The project involves an update to the City of Burbank's Housing Element for the 2021-2029 planning period, along with minor updates to the Safety and Mobility Elements, and the incorporation of environmental justice goals and objectives to the City of Burbank's 2035 General Plan. The proposed Housing Element Update establishes programs and actions to further the goal of meeting the existing and projected housing needs of all household income levels of the community. It will also provide evidence of the City's ability to accommodate the Regional Housing Needs Assessment (RHNA) allocation through the year 2029, as established by the Southern California Association of Governments, and identifies any rezoning needed to reach the required housing capacity. In addition, the project includes updates to the Safety Element triggered under State law by an update to the Housing Element, as well as updates to the Mobility Element to incorporate vehicle miles traveled (VMT) metrics. The NOP has been recirculated because the forthcoming EIR will now analyze the impacts of 10,088 housing units, rather than 8,800 units as originally planned, to account for a 15% buffer for the RHNA. The City of Burbank is the Lead Agency under the California Environmental Quality Act (CEQA).

The project, which spans the entire City of Burbank, intersects with State Route 134 (SR-134) and Interstate 5 (I-5), and is located in close proximity to the United States 101 (US-101). From reviewing the recirculated NOP, Caltrans has the same comments as it did on the original NOP, which are the following:

- For information on determining transportation impacts in terms of VMT on the State Highway System, see the *Technical Advisory on Evaluating Transportation Impacts in CEQA* by the California Governor's Office of Planning and Research (OPR), dated December 2018: [http://opr.ca.gov/docs/20190122-743\\_Technical\\_Advisory.pdf](http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf).
- The City can also refer to Caltrans' updated *Vehicle Miles Traveled-Focused Transportation Impact Study Guide* (TISG), dated May 2020 and released on Caltrans' website in July 2020: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>. Caltrans' new TISG is largely based on the OPR 2018 Technical Advisory.

- Caltrans looks forward to reviewing the VMT analysis for this project. As discussed in Caltrans' new TISG, Caltrans strongly recommends undertaking project VMT analysis, significance determination, and potential mitigation in a manner consistent with OPR's Technical Advisory.
- The updated TISG states, "Additional future guidance will include the basis for requesting transportation impact analysis that is not based on VMT. This guidance will include a simplified safety analysis approach that reduces risks to all road users and that focuses on multi-modal conflict analysis as well as access management issues." Since releasing the TISG, Caltrans has released interim safety analysis guidance, dated December 2020 and found here, for the City's reference: <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>.
- Caltrans encourages lead agencies to complete traffic safety impact analysis in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

The following information is included for your consideration.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Furthermore, Caltrans encourages Lead Agencies to implement Transportation Demand Management (TDM) strategies that reduce VMT and Greenhouse Gas (GHG) emissions. For TDM options to potentially include in the updated Housing, Safety, or Mobility elements, please refer to:

- The 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), available at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>, or
- *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8) by the Federal Highway Administration (FHWA), available at <https://ops.fhwa.dot.gov/publications/fhwahop12035/index.htm>.

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at [Emily.Gibson@dot.ca.gov](mailto:Emily.Gibson@dot.ca.gov), and refer to GTS # 07-LA-2021-03528.

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief  
cc: Scott Morgan, State Clearinghouse