

DEPARTMENT OF TRANSPORTATION

DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 269-1124
FAX (213) 897-1337
TTY 711
www.dot.ca.gov



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March 16, 2022

Governor's Office of Planning & Research

Mar 17 2022

Shipra Rajesh, Associate Planner
City of Burbank
Community Development Department-Planning Division
150 North Third Street
Burbank, CA 91502

STATE CLEARINGHOUSE

RE: Burbank Housing and Safety Element
Update
SCH # 2021020393
Vic. LA-134 & LA-05 Citywide
GTS # LA-2021-03840-DEIR

Dear Shipra Rajesh:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The Burbank Housing Element Update and Associated General Plan Updates involves an update to the Housing Element for the 2021-2029 planning period, along with minor updates to the Safety and Mobility Elements, and incorporates environmental justice goals, policies and objectives to the City of Burbank's 2035 General Plan. The updated Housing Element will lay the foundation for achievement of the City's fair share housing needs for approximately 10,456 additional units.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<http://opr.ca.gov/ceqa/updates/guidelines/>

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, all future developments should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better

manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Also, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared in On December 18, 2020. You can review these resources at the following links:

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>

<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 prepare traffic safety impact analysis for all developments 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.

Caltrans acknowledges from the DEIR that “As shown in Table 4.11-1, full buildout of the 2029 Housing Element Update would result in 3 percent less average total VMT per service population, 39 percent less average VMT per capita, and 7 percent less average VMT per employee compared to the 2021 SCAG region baseline. This result exceeds the thresholds of significance for average total VMT per service population and average VMT per employee and does not exceed the threshold of significance for average VMT per capita. The analysis shows that the addition of new housing to the City in conformance with the goals and policies of the Housing Element provides a large reduction in VMT per capita because the Project improves the jobs-to-housing balance in Burbank, allowing more residents to live closer to their work location. The goals and policies of the Housing Element also reduce VMT per employee. However, since a large proportion of employees who work in Burbank live outside of Burbank, the reduction in VMT per employee due to the Project is not as large as the reduction in VMT per capita. In other words, adding housing supply affects resident travel behavior more so than employee travel behavior. Similarly, the Project provides a reduction in total VMT per service population, but to a lesser extent than VMT per capita. This is because total VMT per service population includes non-home-based trips, such as heavy truck delivery trips (i.e., adding housing supply does not directly affect freight/logistics operations in the City). Therefore, while the Housing Element would reduce VMT for all three metrics, it would not reduce them beyond the threshold of 15 percent for two of the metrics. Since the Housing Element Update would exceed two of the three thresholds of significance, the project results in a significant impact.”

Potential mitigation measures that would reduce the average total VMT per service population and average VMT per employee are generally project specific mitigation measures such as:

- Provide bicycle parking at employer locations
- Provide parking cash-out programs
- Provide car-sharing, bike sharing, and ride-sharing programs at employer locations
- Provide transit passes to employees
- Improve or increase transit accessibility to employer locations
- Improve pedestrian or bicycle networks, or transit service
- Provide traffic calming features on City roadways

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These mitigation measures can be applied at the project specific level but are not feasible at the program level for a housing element as they are beyond the scope of the document. Therefore, there is no feasible mitigation available to reduce the impacts.

Given the above finding, Caltrans recommends a post-development VMT analysis for each development project with all mitigation measures be prepared for monitoring purpose and for future project thresholds in the area. Additional mitigation measure should be implemented when the post-development VMT analysis discloses any traffic significant impact.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 269-1124 and refer to GTS # LA-2021-03840-DEIR.

Sincerely,



MIYA EDMONSON
LDR/CEQA Branch Chief

email: State Clearinghouse