



January 15, 2011

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City of Los Angeles
200 N. Spring Street, Room 721
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RE: DEIR Case Number:
ENV-2007-0254-EIR

The following comments relate specifically to the NBC Universal Evolution Plan (the “Project”) Draft Environmental Impact Report (the “DEIR”) dated November, 2010. The DEIR **does not** adequately address the impacts on the community from the proposed Project. Based on a review and analysis of each of the proposed alternatives (with the exception of the “no Project” alternative) the Board of the Studio City Neighborhood Council **does not agree** that: (i) any of the other alternatives as proposed would meet the Project goal which is to “recognize and protect the neighboring off-site residential and commercial developments through implementation of specific zoning regulations that would govern the development of the Project Site.” (ii) “These regulations, among other things, provide a level of certainty for the neighbors regarding the future use of the Project Site.” or (iii) “appropriate improvements on-site and to the local regional street systems would be implemented to accommodate future traffic growth.” [Volume I- Page 277]. In fact, the provisions of the proposed Universal City Specific Plan and the Universal Studios Specific Plan which are a fundamental part of the DEIR have been drafted in such a way as to effectively eliminate any requirement for the developer or its successors to comply with many of the provisions of: (i) the current zoning code, (ii) the 2002 City Sign Ordinance which was upheld by the courts in 2010, (iii) the provisions of the LA RIO Master Plan, (iv) the Ventura/Cahuenga Boulevard Corridor Specific Plan (the “VCBC Specific Plan”), and/or (v) the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (the “Community Plan”). Each of these documents represents the long range planning vision for this part of the City of Los Angeles and includes important protections for its stakeholders. These governing documents should not be overridden or ignored.

The Community Plan at 1-1.2 has the stated policy objective: “Protect existing single family residential neighborhoods from new, out-of-scale development.” and at 1-1.3 “Protect existing stable single-family and low density residential neighborhoods from encroachment by higher density residential and other incompatible uses.” The Community Plan map identifies land where only single-family residential development is permitted: it protects these areas from encroachment by designating where appropriate, transitional residential densities which serve as buffers and reflects plan amendments and corresponding zone changes which are directed at minimizing incompatible uses. This proposed Project site is at the east entry to the San Fernando Valley. The San Fernando Valley has long been

recognized as the epitome of suburban life. [Appendix A]. This area is in no way an “urban core” as stated in the DEIR on page 278 and the goals and objectives of the Community Plan are not the creation of an “urban community” which would include a Mid-rise/High-rise Town Center and two Mid-rise/High rise Residential Areas. [Appendix B] Such development would not be compatible with either: (i) the existing scale and character of the community or (ii) the stakeholders’ vision for this neighborhood.

VCBC Specific Plan designates much of the area surrounding the Project Site as “regionally impacted as to traffic” [Appendix C]. The DEIR identifies traffic as a **significant and unavoidable** impact and acknowledges that even after the mitigations proposed “**significant and unavoidable** impacts would remain at” 9 intersections, 4 of which are in Studio City [Appendix D]. The analysis required by CalTrans of the impact of the Project to on-ramps and off-ramps and those freeway segments to which the Project would add the most traffic indicates that impacts would not be reduced to a less than **significant** level [Appendix E]. The Studio City Neighborhood Council requests that the Project be reduced in scale until it results in no **significant** adverse impacts and no **unavoidable** impacts after mitigations.

The DEIR improperly defines the Studio City Community as a hillside community buffered from the Project by the 101 Freeway and the existing commercial buildings. It further improperly defines its borders [Appendix F]. As a result, the DEIR concludes that there are no **significant** impacts to Studio City [Appendix G]. Studio City actually includes the Metro Redline Station, Campo de Cahuenga, South Weddington Park, the Island Neighborhood, Rio Vista Elementary School, the Ventura Boulevard area of the ACBC Specific Plan and the entire flatland area from the Hollywood Freeway to the east, the 101 Ventura Freeway to the north and Fulton to the West. Therefore, the Project would actually result in many **significant and unavoidable** impacts to Studio City including impacts on traffic, noise and air quality. One major traffic impact on Studio City is at the Project access point of Lankershim Boulevard and Campo de Cahuenga Way/Universal Hollywood Drive. Despite this, the DEIR falsely states that “the proposed Project would not substantially and adversely change the existing land use relationships between the Project site and the Studio City Area [Appendix H].

The DEIR acknowledges that **significant** impacts on the environment from the Project cannot be reduced to a level of insignificance even after mitigation and they are therefore **unavoidable**. An “**Unavoidable**” impact is simply **not acceptable** in an area where there are already **significant** cumulative unmitigated impacts from developments that have been built over the past three years. The following comments are identified by the DEIR page number to which they relate. Each of these comments should be considered as a question of who, what, where, when or why as such would apply and we request a response to each of them.

This DEIR does not include the Metro Universal Project although it is mentioned on page 269 of Volume I. [Appendix I]. The DEIR for that proposed project should be cumulatively reviewed with the NBC Universal Evolution Project as the communities requested before this DEIR was prepared. The Studio City Neighborhood Council has previously submitted extensive comments with respect to the Metro Universal Project ENV-2007-933-EIR expressing our objection to the numerous **significant unavoidable** impacts that would result

from that project. Without reviewing the DEIRS for both projects simultaneously, the cumulative impact of these projects cannot be properly evaluated [Appendix J].

The remainder of this document is organized into three sections: (i) General Comments on the DEIR, (ii) Comments on the Universal City Specific Plan and (iii) Traffic Comments. The appendices, attachments and exhibits attached to this letter of comment contain documentation in support of the comments to which they relate.

The Studio City Neighborhood Council has also received questions and comments related to the Project from its stakeholders. The comments received are included as Appendix JJ to this letter.

The City of Los Angeles has concluded that of the 17 categories of environmental factors listed in the Initial Study Checklist 15 of them were determined to have potentially **significant** impacts. They further concluded that of the 87 specific items in the checklist, 67 of them were determined to have potentially **significant** impacts. Clearly this demonstrates that the project, as proposed would have a permanent **significant** adverse impact on our community.

Despite the volume of information in the DEIR, it **does not** adequately address many of the impacts of the proposed Project. We **do not agree** with the conclusion set forth that certain impacts cannot be mitigated and are **unavoidable** or that the **significant** effects on the environment have been analyzed adequately in the DEIR. CEQA guidelines require the selection of the environmentally superior alternative. We agree that the proposed Project should comply with CEQA guidelines. The Project should be reduced in scale and character until it results in no **significant** adverse impacts after mitigation.

Studio City has changed considerably since 2007. Yet most of the supporting tables and maps were prepared as of 2007. We request that these documents be updated. We request that the Final EIR address each concern listed herein and that the proposed Project not be allowed to proceed in its current form. We request that no changes to the current zone code designations or other regulations and ordinances that are protective of our community be permitted. The motion passed by the SCNC in support of the conclusions set forth in this document is included at Exhibit 21.

We appreciate your consideration of our position.

Sincerely yours,



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DEIR Page No.	General Comment
<p>Table 2 Total Wastewater Flows Page 5</p> <p>Page 6</p>	<p>The table in the DEIR indicates that all pipes would be less than 50% full at the point of connection to the City sewer system.</p> <p>The Conclusion in the DEIR with respect to all existing and proposed private sanitary sewer pipes and areas evaluated in this study is that the pipes “do not need to be upsized as a result of the proposed project.” It also states the “City’s 72-inch diameter Valley Relief Sewer and Parallel 42-inch diameter sewers have the capacity to accommodate the additional wastewater flows from the County portion of the project site.</p> <p>We do not agree with this conclusion. The infrastructure in our City is not sufficient to handle existing volumes. Odors emanating from the sewer into local residences and businesses are prevalent. As a result, Studio City and North Hollywood are listed as “hot spots” in the City’s Sewer Odor Control Master Plan dated October 2006. Physical characteristics in the area that contribute to this include insufficient slope, severe slope reductions, downstream diameter reductions, major junction structures and proximity to an inverted siphon [Appendix L]. One action taken to reduce odors was the construction of a scrubber at Radford/Woodbridge and construction of an additional scrubber is being considered. The long term approach for odor control by reducing the pressure in the area is the construction of the Glendale Burbank Interceptor Sewer (the “GBIS”) [Appendix L]. Until construction of that interceptor sewer is completed and an analysis done to determine that it is effectively addressing the problem, no additional project construction should be permitted.</p> <p>We question the validity the study cited as the Count of Los Angeles Superior Court has decided that the City of Los Angeles did not properly identify and analyze all of the environmental impacts of the GBIS. The Court determined there was a lack of analysis in regards to settlement impacts, traffic impacts, traffic mitigation, construction noise and cumulative impacts. The first step of decertification of that EIR was taken by Los Angeles Public Works Board on December 12, 2007 [Appendix M].</p>
<p>Appendix I-1-1 Page 4</p>	<p>The description of the environmental setting is in error as it indicated that “The upper portion of the watershed is forest and open space.” [Appendix N]. This statement does not take into account the devastation to the forest area caused by the Station Fire in 2009 [Appendix O]. FEMA officials have concluded that the Los Angeles region faces major flood risk. The Los Angeles river adjacent to the project site is part of the region’s flood control system. Much of the system was designed more than 40 years ago. Since then, massive urban sprawl has sharply reduced the amount of unpaved ground available to absorb water, and runoff has increased about 25% [Appendix P].</p>

DEIR Page No.	General Comment
Drainage Technical Report Volume IV.G.2 Page 1428	<p>“Development of the Project would include some net conversion of existing pervious surfaces to impervious surfaces, which would have the potential to reduce ground water recharge. Additionally, “Development associated with the proposed Project would result in a net increase in impervious surface to approximately 70 percent of the Project Site.” We do not agree that the “operation of the Project would not result in demonstrable and sustained reductions of groundwater recharge and capacity.”</p> <p>However, of even greater concern is the fact that a 70 percent increase in impervious surface as a result of the construction of the Project would dramatically increase runoff and contribute to the risk of flooding. [Appendix Q]. This is of extreme concern to Studio City as the location of the Project Site places it within 2 miles of the low point in the San Fernando Valley at the confluence of the Tujunga Wash and the Los Angeles River [Appendix Q-1].</p>
Volume IV.G.2 Page 1427	<p>Below grade structures associated with the Project extend into the ground water table. Those structures may require permanent dewatering systems. The effect of this permanent dewatering on the existing residential community has not been adequately addressed in the DEIR and we are concerned that it may undermine the adjacent hillside residential area and put those homes at risk of geological damage.</p>
Volume IV.F Page 1315	<p>Many of the properties located on the Project Site that will be within the City of Los Angeles will be located on liquefaction. Construction of mid-rise and/or high rise buildings up to 80 stories tall on soil that is in a liquefaction zone per ZIMAS should not be permitted [Appendix R].</p>
Volume IV.L.2 Page 1855	<p>We are concerned about the additional demands for potable and recycled water that will be placed on the DWP if this project is constructed. The water demand for the proposed development is estimated to be 2,131.7 acre-feet per year of potable water, and 351.0 acre-feet of recycled water [Appendix S]. Despite the agreement by NBC Universal that it will provide annual replacement water supplies to the proposed Project, we do not believe that there will be sufficient water for the existing DWP customers, let alone enough to meet the demands that would be generated by this Project. DWP customers are already subject to water rationing [Appendix T] despite the fact that LADWP already has pumping rights in the Central and/or West Coast Basin. Allowing NBC Universal to provide replacement water supplies in the form of leased pumping rights in those same areas will not increase the amount of water available from that source. It will simply give the LADWP an additional source of revenue [Appendix S]. “According to the <i>Los Angeles Times</i>, the state’s water reserves are nearly finished” [Appendix U-1 and U-2]. Water is not a renewable resource action to conserve what we currently have and avoid additional demands on the existing resource must be taken seriously. [Appendix U-3]</p> <p>Why is the requirement for replacement water different for the portion of the Project in the City (30 years) than it is for the portion of the Project that is located in the County (50 years)?</p>

Page No.	General Comment
Volume IV.L.2 Page 1855	<p>Why have water usage tables been left out of the DEIR?</p> <p>Please define “reclaimed water” as it is used within the DEIR. Is this really “toilet to tap” water?</p>
Report by HR&A Advisors, Inc Page 1 Page 5	<p>It is the LAUSD’s objective to a “enable all students to attend schools in their home neighborhoods.”</p> <p>None of the following schools: Valley View Elementary School, Bancroft Middle School or Hollywood High School, which have been designated in the DEIR for serving the children of the Project are even located in the San Fernando Valley [Appendix V]. Sending children to those schools will increase traffic and congestion on Barham Blvd., the 101 Freeway and in the Cahuenga Pass.</p> <p>Based on near-term LAUSD enrollment and capacity projection data, the Project’s cumulative impact on school facilities would be considered significant and adverse.</p> <p>We do not agree that payment of a school facility mitigation fee by the developer is appropriate mitigation. As was required of the developers of the Playa Vista Project the developer should be required to dedicate land for the construction of schools to serve this community. [Appendix W-1] Please note that the August 2, 2007 letter from LAUSD used in the preparation of the DEIR shows the use of tracts and year-round schools [Appendix W]. As the LAUSD has discontinued the use of either of those schedules the adverse impacts of the Project on existing schools would be even greater.</p>
Master Land Use Application	<p>The Developer is requesting an amendment to the Mulholland Scenic Parkway Specific Plan as proposed in Attachment B to delete a portion of the project site from within the Mulholland Scenic Parkway Specific Plan [Appendix X]. We do not support this request as the proposed usage of that area based upon the proposed Universal City Specific Plan permitted uses which would include a establishment of a sign district is not compatible with the character of the surrounding area.</p>
DEIR	<p>We could find no recognition of the existence of the VCBC Specific Plan in the DEIR. However, the Project will significantly impact the VCBC Specific Plan area [Appendix Y-1]. We support the findings of the VCBC Specific Plan Review Board as expressed in their letter [Appendix Y-2] and we request specific compliance with all of the provisions of the VCBC Specific Plan.</p>
Volume I. Introduction/Summary page 42	<p>Throughout the DEIR the Island Neighborhood which is located in Studio City and is under the jurisdiction of the Studio City Neighborhood Council is incorrectly referred to as either the Island Community or the Island Residential Area [Appendix Z].</p>
DEIR	<p>It appears that throughout the DEIR whenever an intersection already has existing LOS of E or F, then the DEIR determines that there is no significant impact from the project on that intersection. Every one of these impacts should be listed in the unavoidable impacts section of the DEIR which is VI. Summary of Significant and Unavoidable impacts. Failure to include them significantly understates the Significant and Unavoidable Impacts of the Project.</p>

Page No.	General Comment
Volume IV.B.1 Traffic Page 733	In numerous locations throughout the DEIR there is a reference to a street “Studio City Place.” Table 17 on page 733 includes a reference to Studio City Place and Ventura Blvd. There is no reference to this street on ZIMAS [Appendix AA]. How can this intersection have been analyzed if it does not exist.
Volume IV.B.1 Page 619 and 665	The Project’s residences are 391 acres away from the Redline Metro Station located on the west side of Lankershim Blvd in Studio City. The DEIR does not recognize that this station is located in Studio City. Further, we do not agree that the Project should receive traffic mitigation credits for proximity to this station. We do not support the sharing of any mitigation measures with the proposed Metro Universal Project [Appendix BB].
Volume 1. Introduction/Summary Page 1	We are not in favor of the proposed annexation and detachment. That proposal results in the removal of revenue generating commercially zoned property from the City of Los Angeles. It also results in the incorporation of significant additional residential property into the City which will result in a strain on the already overtaxed infrastructure and other City resources such as police and fire services [Appendix CC].
Volume IV.B.1 Page 747, 772, 779, 782,796 and 797	CEQA required agencies to compare the potentials significant impacts of proposed projects to an environmental baseline which CEQA provides shall “normally” consist of environmental conditions as they exist when environmental review is commenced. Throughout the DEIR we noted that the environmental impacts are evaluated after giving effect to future events. In particular this skews the results of the impacts with respect to traffic. We request that the DEIR be revised to conform to the ruling of the California Court of Appeal Sixth District [Appendix DD].
Volume IV.N.2 Housing Table 192 Page 2073 Volume VII Significant and Irreversible Environmental Changes Page 2441	Throughout the DEIR the applicant takes credit for compliance with the LEED rating system. We are concerned that the LEED certification does not make buildings save energy. The commitment of nonrenewable resources required for the type and level of proposed development would limit the availability of these resources for future generations for others uses. We do not agree with the conclusion that “the use of such resources would not be considered significant .” The Project should be reduced in scale until it is deemed to have no adverse impact on the environment [Appendix EE].
Volume II Project Description Page 263 and 292	There are two major existing hotels within the Project Site and there are many smaller hotels and motels within one mile of the Project Site. We have contacted the major hotels and been advised that their average occupancy is between 69% and 75%. There is no specific information about the proposed 500 room hotel within the DEIR. We do not know the specific location of the proposed hotel. The developer should not be granted blanket approval for this hotel. Hearings should be held when specific information about the hotel is available.

Page No.	General Comment
Volume IV.E.3 Glare Page 1157	<p>We are unable to locate the maps showing the impact of cumulative shadows from the Project that would result in Spring or Summer. The DEIR concludes that fewer shadows would actually than would be shown by the analysis [Appendix FF]. We believe that the analysis is incomplete without the maps referred to above.</p> <p>We have grave concern that the portion of the Los Angeles River adjacent to the Project Site is show on the maps in the DEIR as being continually in the shadows. That result is not compatible with the LA RIO Master Plan [Appendix GG].</p>
Project Mailers	<p>We are concerned that the Project mailers mislead the stakeholders by indicating that 43,000 jobs will be created. The vast majority of these jobs (31,000 jobs) will be temporary construction jobs projected to be generated over the 20 year life of the project Appendix HH).</p> <p>The mailer indicates that 12,000 new full and part-time jobs will be generated. What types of jobs are those? It indicates that \$26 million annually in new tax revenues will be generated. How much of that will actually trickle down to the City of Los Angeles? Almost all of the revenue generating commercial development will be in the County, while all the strain on infrastructure and governmental services will result from the residential development in the City.</p> <p>One of the mailers indicates that the developer will invest \$100 million in transit solutions throughout the City that could unlock over \$200 million in Federal and State Funds. Another mailer indicates that \$100 million dollars will be invested to accelerate local and regional transit improvements. Please specifically delineate by traffic improve the location and amount of each such improvement that adds up to both the \$100 million and \$200 million.</p> <p>Please note that the Measure R Project Tracker for the City of Los Angeles shows that no Measure R funds are allocated for the south-east San Fernando Valley [Appendix II and II-1].</p> <p>At a south-east valley neighborhood councils' town hall meeting held in February 2008, Doug Failing, then of CalTrans and now of Metro, stated that there no funds available for any CalTrans improvements in the south-east valley.</p> <p>One of the mailers indicates that a new north/south road will be built that will help alleviate traffic on Barham. The fact of the matter is that, all that road will do, is move traffic within the new proposed residential area. The residents of that area will still need to exit the development on Barham or travel though the Universal Studios property past the theme park and hotels to exit on Lankershim Blvd. at an intersection which is already a choke point.</p>

Page No.	General Comment
Project Mailers	<p>It should be noted that modernization of studio facilities, while important to the future of studio production, often results in a reduction in the number of studio jobs as technological advances reduce the number of people needed to operate equipment.</p> <p>The flyers indicate that 35 acres of open space, parks and trails will be created. However, analysis of the provisions of the proposed Specific Plans reveals that many of the sites designated as open space do not have to be open space at all.</p>

**STUDIO CITY NEIGHBORHOOD COUNCIL
COMMENTS ON PROPOSED UNIVERSAL CITY SPECIFIC PLAN
DEIR APPENDIX A-1**

Page	Paragraph	Item	Comment
4	3	<p>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 City Walk) and new entertainment venues, hotel and office uses.</p>	<p>Los Angeles City Specific Plans are adopted with input from the stakeholders of the effected community in an effort to establish regulations, standards, procedures, and guidelines which will preserve and enhance community aesthetics which are generally more restrictive in nature than the provisions of the Municipal Code.</p> <p>A specific plan is developed by the community. Therefore, by definition, the stakeholders of the community plan area have extensive involvement in developing each of the provisions of the specific plan. Such provisions are intended to set forth standards to be adhered to which are protective of the scale and character of the area.</p> <p>The process for development and adoption of specific plans includes outreach to the surrounding communities. The specific plans that have been included as part of the DEIR have been developed in a vacuum. The standard city process for development and implementation has not been followed.</p>

Page	Paragraph	Item - Universal City Specific Plan	Comment
4	3	The proposed City and County Specific Plans continued.	<p>The provisions of these specific plans have been drafted in such a way that they will actually prevent the residents that will inhabit the homes once they are built from having input into the planning process. The Universal City Specific Plan provides incorporates several zoning exceptions to the height requirements.</p> <p>We object to the circumventing of the planning process by including the proposed specific plans with their numerous changes to existing zoning through their inclusion in the DEIR.</p>
6,7 & 8	Section 1.2	Adoption of the proposed Universal City Specific Plan would override 29 provisions of the Municipal Code.	<p>These provisions will permit the proposed development to dramatically increase the density of the area. The proposed project requests mixed use development (residential and limited neighborhood commercial serving the residential development), including a range of residential types, small lot subdivision and air space lots (with accompanying design guidelines) as well as production related facilities and studio office uses in the western portion of the project site. This will also result in the removal of protected trees. (page 1 of Attachment B of the City Master Land Use Permit Application) (Exhibit 1)</p>
5	Exhibit 1a	The proposed development anticipates the annexation of approximately 76 acres (primarily within the back lot area) from the unincorporated County into the City.	<p>This will have the effect of placing all of the proposed residential development within the City.</p> <p>This proposed increase in density is not compatible with the current scale and character of the surrounding community. At a time when the City and County are in desperate need of jobs, we should not be approving the conversion of revenue generating commercial and industrial property into residential zones.</p>

Page	Paragraph	Item - Universal City Specific Plan	Comment
		<p>Current community plan and zoning designations for the 5 portions of the project site located within the City are: (1) the northeast area of the project site along Barham Blvd. is designated limited commercial and very low density residential, with corresponding zoning of C1 and RE20, respectively, and along the Los Angeles River Flood Control Chanel near Barham Blvd. is designated open space; (2) the northwest area of the project site located along Lankershim Blvd. is designated community commercial with corresponding C2 zoning; (3) the southeast area of the project site along Barham Blvd. and Buddy Holly Drive is designated very low and minimum density residential, with corresponding zoning of RE 20 and RE 40, respectively; (4) the southwestern area of the project site located along the Hollywood Freeway and adjacent to Hotel and office towers is designated regional center, as well as medium and minimum density residential, with a variety of zoning designations including C2, PB, P, RE15 and RE40; (5) a small portion of land along the north boundary in the middle of the project site adjacent to the Los Angeles River flood control channel, is designated open space, with R1 zoning. In addition the southeast corner of the project site is located in the outer corridor of the Mulholland Scenic Parkway Specific Plan.</p>	<p>Within the County of Los Angeles, the portion of the project site occupied by studio uses is designated major industrial within the county’s general plan land use policy map, with the balance of the project site within the County designated as major commercial. Corresponding County zoning is M-1½. Accordingly, the back lot portion of the site which is proposed to be annexed to the City of Los Angeles is also currently within the County’s major industrial land use designation and M-1½ zoning. (pages 1, 2 and 3 of Attachment B of the City Master Land Use Permit Application) (Exhibit 2)</p> <p>All of these revisions will serve to significantly increase density and convert revenue generating commercial and industrial property into residential uses. (Exhibit 3)</p>

Page	Paragraph	Item - Universal City Specific Plan	Comment
9	Section 1.6	<p>RELATIONSHIP TO EXISTING USES: The Universal City Specific Plan creates a regulatory framework for long-term development of the Specific Plan area. The Specific Plan also recognizes, however, that Existing Uses within the Specific Plan area will continue as the development permitted by this Specific Plan is implemented. Existing Uses include, but are not limited to: Studio Use including Production Activities; Studio Office; entertainment uses including the Theme Park and Universal Studio Tour; and retail uses. Existing Uses shall be permitted to continue, subject to the applicable regulations of this Specific Plan, including any applicable provisions of Section 3.4 of this Specific Plan.</p>	<p>The Specific Plans proposed by this developer are different from those in effect in the surrounding communities. The developer developed these plans to govern their future development. The Universal City Specific Plan has a "master plan" for a future developer that purchases a site to build. It is possible that the sites will be acquired by different developers who then build the condos, apartments, etc. The plan included the open areas, etc. Those developers will be bound by this Specific Plan.</p> <p>Since this is the applicant's specific plan, the neighborhood has not had the opportunity, as they did in surrounding communities' specific plans, to have input in its development.</p> <p>The Existing Uses and the Existing Use Overlay will allow all existing use to continue until permits are issued. Modification of the existing use is permitted as long as the modification does not increase the floor area. Such modifications are exempt from the Substantial Compliance Analysis requirement. The provisions of this section are overly broad and should be defined in such a way that the developer is not given carte blanche with respect to any future development or modification of the existing use.</p>
11	Section 2.1 Goal A.	<p>To establish eligible uses and/or activities; and to provide a mechanism for implementing the appropriate operational requirements, regulations or other requirements for these uses. The requirements contained herein provide the necessary flexibility to accommodate future development and to achieve compatibility between land uses.</p>	<p>Although we understand the desire for flexibility, the provisions of the Universal City Specific Plan are overly broad, they do not adequately set forth standards to be adhered to by future developers and could result in uses that are not compatible to adjacent neighborhoods.</p>

Page	Paragraph	Item - Universal City Specific Plan	Comment
11	Section 2.1 Goal D.	To provide added opportunities to expand this regional center, which is located in proximity to the Universal City Metro Red Line Station and a regional freeway system.	<p>A significant portion of the area which would be governed by the Universal City Specific Plan is currently part of the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan area (the “SOSCCP”). No portion of the proposed Universal City Specific Plan area is currently designated as a regional center in the SOSCCP. The residential portion of the proposed development is on the opposite side of Universal Studios Specific Plan area. That area is not located in proximity to the Universal City Metro Red Line Station.</p> <p>The DEIR anticipates the elimination of the east/west road adjacent to the LA River. Without this road the stakeholders of the proposed residential area will not have direct access to the Universal City Metro station. Additionally, their only access to the regional freeway system is through the “F” rated intersections of Barham/Cahuenga and Barham/Olive. (Exhibits 4 and 4a)</p> <p>It is imperative that the east/west road be constructed and that additional mitigation measures are implemented to reduce the impact on these intersections.</p>
11	Goal F	To recognize the relationship between the Universal City Specific Plan, the Universal Studios Specific Plan, and other uses surrounding the Universal Studios site such as residences, other studios, and other commercial enterprises.	Although this is a stated goal of the Universal City Specific Plan, this proposed specific plan actually ignores the impact of the project on existing residences, and on the scale and character of the surrounding communities.

Page	Paragraph	Item - Universal City Specific Plan	Comment
11	Goal G	<p>To allow a maximum development within the Specific Plan area of 2,937 new Dwelling Units, 115,000 square feet of new retail Floor Area, 65,000 square feet of new Community Serving Uses Floor Area, 250,000 square feet of new Studio Office Floor Area, 50,000 square feet of new Studio Use Floor Area, and 79,665 square feet of existing Studio Office Floor Area and 30 square feet of existing Studio Use Floor Area, including any additional square feet of Floor Area as may be permitted pursuant to Equivalency Transfers as set forth in Subsection 3.11 of this Specific Plan.</p>	<p>The size of the development to be permitted within the Universal City Specific Plan area is too big. As proposed in the DEIR, all of the traffic from the residential development will end up on Barham pursuant to the Proposed Circulation Plan (Exhibit 19) as traveling east or west on Universal Hollywood Drive will take residents through the Universal Studios Theme Park and exits onto Lankershim across from the Metro Station. This is not a feasible route for commuters, if any are actually trying to use the Metro.</p> <p>No residential development should be permitted without sufficient infrastructure including the east/west road adjacent to the LA River.</p>
19	3.2 Section2 Item A.	<p>Except as provided herein, no grading permit, foundation permit, building permit, use of land permit, or permit for a change of use shall be issued for any Project in whole or in part within this Specific Plan area unless the Director has issued a Substantial Compliance Analysis determination pursuant to Section 15 of this Specific Plan.</p>	<p>We do not agree with the proposal to replace the Project Permit Compliance provisions of Section 11.5.7.C of the Municipal Code. This will eliminate local community input by enabling applicants to bypass all local area decision makers such as the Area Planning Commission and go directly to the City Planning Commission. (Page 82 Section 15.1 and 15.2) This would prevent important outreach and input from local organizations such as neighborhood councils and resident associations as well as the neighboring stakeholders who would be most affected. We are not aware of this provision being included in any other current specific plan ordinances.</p>
19	3.2 Section2 Item C.	<p>No Substantial Compliance Analysis shall be approved unless the Project substantially complies with all applicable provisions of this Specific Plan.</p>	<p>We disagree with the concept of substantial compliance as it vest too much power in the Director and this proposed specific plan contains provisions permitting exceptions to its own provisions with respect to height. (Page 1231 of the DEIR) (Exhibit 20)</p>

Page	Paragraph	Item - Universal City Specific Plan	Comment
19	3.2 Section2 Item D.	The prohibitions specified in this Section shall not apply to any of the following uses and facilities, which shall be exempt from the Substantial Compliance Analysis requirement, as set forth in Section 15 of this Specific Plan.	No uses should be automatically exempt from compliance with the Substantial Compliance Analysis requirement as this requirement in and of itself already represents a significant weakening of the protections of the Municipal Code. (Exhibit 5)
19	3.2 Section2 Item E.	Prohibited Uses and Facilities.	We agree with the prohibited uses listed. However, the following uses should also be prohibited. Small lot subdivisions, factory built homes, bed and breakfast facilities, modular office trailers, and maintenance facility/storage facilities. Additionally, Item 84 of Section 3.8 should be eliminated as it vests too much power in the Director and thwarts community input and involvement.
20	3.3 Section B. Table 1	Maximum Permitted Floor Area by Land Use Category	<p>For all categories the maximum permitted development is excessive and should be reduced significantly. There should be no residential development in this area as the area should continue to be zoned as manufacturing and commercial as that is the type of development that will bring permanent jobs to the area. By allowing residential development the City would be required to provide services and infrastructure that it is not able to provide to existing neighborhoods now.</p> <p>Additionally, the open space area is subject to a change in use (page 27 of 85) and even allows for a height exception in the open space area. Why would there ever be a need for a height exception in the open space areas. (Environmental Assessment Form - II.Project Description Page II-10) (Exhibits 6a, 6b and 6c)</p>
20	3.3 Section B. Table 1	Table does not reflect additional square feet of retail or hotel Floor Area as may be permitted pursuant to Equivalency Transfers as set forth in Subsection 3.11 of this Specific Plan.	The Equivalency Program permits the development of a 500 room hotel in an area that already has two major hotels within the boundaries of the project site and several other hotels in the immediately surrounding area.

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23	3.4 Section	The Existing Uses within the Existing Use Overlay may continue within each of the applicable Planning Subareas until a building permit for a residential building is issued within that Planning Subarea. When a building permit for a residential building is issued for a Planning Subarea, Existing Uses in adjacent Planning Subareas within the Existing Use Overlay shall be permitted to continue until building permits for residential buildings are issued in those Planning Subareas.	We agree that existing uses should be allowed to continue. Although we do not agree that there should be any residential development as part of this project, if residential development is begun then existing uses in adjacent areas should be allowed only if there is a significant separation and noise barriers between the existing uses and the residential areas as well as the open space areas.
23	3.5 Section B Item 8	Open Space District 1	Item 8, Director's discretion – should be eliminated.
24	3.5 Section K	Open Space District 1	Although signs are limited in Open Space Districts 1 and 2 to information, temporary signs, and public facility signs, the signage proposed for the adjacent sign districts is so broad that there could be significant lighting intrusion and blight from those districts into the open space areas. We do not agree with the creation of the proposed sign districts. (Exhibit 7)
25	3.6 Section B Item 6, 7, 8,9 and 10	Open Space District 2	Uses permitted under items 6 through 9 are not compatible with an open space area and should not be permitted.
25	3.6 Section B Item 11	Open Space District 2	Item 11, Director's discretion – should be eliminated.
25	3.6 Section C Item 11	Open Space District 2	The construction of 5,000 square feet of floor area is not consistent with open space and should not be permitted.
25	3.6 Section F	Open Space District 2 – No automobile parking required	Some designated parking should be provided adjacent to this open space area otherwise adjacent residential and commercial areas will be burdened by the cars parked by users of the open space.
26	3.6 Section G Items 3, 3,5, and6	Open Space District 2	These uses should not be permitted in the open space district. Service facility and utility infrastructure structures that are 55 feet high are not compatible with open space.
26	3.6 Section J	Open Space District 2	Removal of protected trees should not be allowed.

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26	3.5 Section K	Open Space District 2	Although signs are limited in Open Space Districts 1 and 2 to information, temporary signs, and public facility signs, the signage proposed for the adjacent sign districts is so broad that there could be significant lighting intrusion and blight from those districts into the open space areas. We do not agree with the creation of the proposed sign districts.
26	3.7 Section B Items 2, 4, 6, 7, 8, 9, 10, 11 and 16	Open Space District 3	This open space area is a long narrow area where there does not appear to be sufficient space to accommodate these uses. Further, residential uses to the south would be subjected to light intrusion.
27	3.7 Section B Items 2, 12, 13, 14, and 15	Open Space District 3	This open space area is a long narrow area where there does not appear to be sufficient space to accommodate these uses. These uses should be significantly restricted as to the number and type permitted each year. i.e. a maximum of one or two outdoor festivals per year. Additionally, no parking is provided. Some designated parking should be provided adjacent to this open space area otherwise adjacent residential and commercial areas will be burdened by the cars parked by users of the open space.
27	3.7 Section E Items 1 and 2	Open Space District 3 – The Height Zones range between 625 feet above MSL to 825 feet above MSL.	Structures that are 625 to 825 feet high are not compatible with open space and should not be allowed.
27	3.7 Section H	Open Space District 3 – Protected Trees	Removal of protected trees should not be allowed or should be severely restricted.
27	3.7 Section I	Open Space District 3 – Signage	There does not appear to be any limitations on the type of signs permissible in Open Space District 3 similar to those in Open Space Districts 1 and 2. Additionally, the signage permitted in the adjacent sign districts is so broad that there could be significant lighting intrusion and blight from those districts into the open space areas. We do not agree with the creation of the proposed sign districts.

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28, 29 and 30	3.8 Section B Items 3, 9, 17, 20, 25, 43,51, 55 and 61	Mixed Use Universal City District Permitted Facilities and Uses	The facilities and uses listed in Items 9, 17, 20, 25,43,51,55 and 61 should not be permitted as part of this specific plan.
31	3.8 Section B Item 80	Mixed Use Universal City District - Temporary Uses	This item is overly broad and should be eliminated. Any temporary uses should be narrowly defined as to time and character.
31	3.8 Section B Item 84	Mixed Use Universal City District	Item 84, Director's discretion – should be eliminated.
31	3.8 Section E Item 84	Mixed Use Universal City District - Height	The maximum height listed in Exhibit No. 5 for every planning sub area is too high. All heights should be significantly reduced to conform to the scale and character of the surrounding area. Views are protected by the Sherman Oaks- Studio City- Toluca Lake –Cahuenga Pass Community Plan. Allowing these heights will obliterate the protected views of the current residents of the community plan area see objective 1.3. (Appendix K2)
31	3.8 Section H	Mixed Use Universal City District – Protected Trees	Removal of protected trees should not be allowed or should be severely restricted.
31	3.8 Section I	Mixed Use Universal City District – Signage	The signage permitted in the adjacent sign districts is so broad that there could be significant lighting intrusion and blight from those districts into the open space areas. We do not agree with the creation of the proposed sign districts.
32	3.9 Section B Items 2, 8, 11, 12	Technical Support Overlay Subdistrict – Permitted Facilities and Uses	This area borders the Los Angeles River and the provisions of this proposed specific plan must be in complete compliance with the provisions of the LA RIO Master Plan. Storage of Entertainment Attractions, displays and equipment would not be in keeping with the provisions or intent of the LA RIO Master Plan. Additionally, it could result in significant blight at a main entry point to the proposed specific plan area.
32	3.9 Section B Item 13	Technical Support Overlay Subdistrict – Permitted Facilities and Uses	Item 13, Director's discretion – should be eliminated.

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32	3.9 Section C	Technical Support Overlay Subdistrict – Height	The maximum height of 625 feet is too high. This height should be significantly reduced to conform to the scale and character of the surrounding area. Views are protected by the Sherman Oaks-Studio City- Toluca Lake –Cahuenga Pass Community Plan. Allowing these heights will obliterate the protected views of the current residents of the community plan area see objective 1.3. (Appendix K2)
33	3.10 Section B Items 1, 8, 9, and 13	Studio Production District – Permitted Facilities and Uses	Much of this district borders US Highway 101 and could be visible from there. These uses could result in blight. None of these uses should be permitted unless specific beautification measures are employed to ensure that they do not result in blight. Such measures should include requirements for the planting of trees and providing screening from view through the use of other types of soft scape.
33	3.10 Section B Items 14, 15, and 16	Studio Production District – Permitted Facilities and Uses	Most of this is a long narrow area which does not appear to be designed to accommodate these uses. These uses should be significantly restricted as to the number and type permitted each year. i.e. a maximum of one or two outdoor festivals per year. The use of the area for outdoor special lighting effects will result in a distraction hazard for motorists on Highway 101.
33	3.10 Section B Items 17	Studio Production District – Permitted Facilities and Uses - Signage	We do not agree with the creation of the sign districts as part of this specific plan. The only signage that should be permitted in area 2A and AB should be those that are in compliance with the 2002 Los Angeles City Sign Ordinance. For safety reasons and for protections of views no signs should be allowed on roofs. No offsite signage, supergraphics or animated signs should be allowed at all.
33	3.10 Section B Items 18	Studio Production District – Permitted Facilities and Uses	Item 18, Director’s discretion – should be eliminated.

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33	3.10 Section F	Studio Production District – Height	<p>The Community Plan calls for the commercial zones to be height District 1 – maximum 1.5:1 FAR and 45 feet for residential. (Exhibits 8a and 8b). Footnotes were added to the Community Plan sometime since it was enacted in 1998 that changed some areas to Height District 1L, 1VI, and 2. This increased the heights significantly to 1L which is 75 feet and 75 feet or 6:1 FAR in district 2. There is no indication of the date when this was done and we would like to know if public hearings were held. On ZIMAS, all the maps for the properties which are in the specific plan area show height district 1. No buildings should be allowed which exceed the heights currently provided for in the community plan. Buildings that are 700 feet and 850 feet high are too tall. They are not in accordance with the scale, character, or intent of the community plan. We object to the Sepecific Plan’s built in exception for height.</p>
34	3.10 Section I	Studio Production District – Protected Trees	Removal of protected trees should not be allowed or should be severely restricted.
34	3.10 Section J	Studio Production District – Signage	<p>The signage permitted in the sign districts is so broad that there could be significant lighting intrusion and blight from those districts into the open space areas. We do not agree with the creation of the proposed sign districts.</p> <p>Please note that on Figure 20 “2B” is labeled as “Studio Technical Lot Sign District”(page 323) This area is actually part of the Studio Production District not part of the Technical Support Overlay Subdistrict. See (page 281). (Exhibits 9 and 9a)</p>
34	3.11 Section A and B	Land Use Equivalency Transfers	The Equivalency Program permits the development of a 500 room hotel in an area that already has two major hotels within the project site and several other hotels in the surrounding area. We object to the inclusion of Equivalency Transfers as part of this proposed specific plan.

Page	Paragraph	Item - Universal City Specific Plan	Comment
34	Section 4 4.1 Items A and B	Design Standards – Height Zones, Height Exceptions and Sight Coverage, Massing and Height	<p>The Community Plan provides that commercial development should complement any unique and existing development uses and requires reinforcement of desirable design characteristics and uses. (Exhibit 10a) We agree with those portions of the proposed project that foster studio uses and good permanent job creation.</p> <p>The Community Plan also provides that commercial development should be directed toward the Los Angeles River and should promote the use of the river access for pedestrian trails and low intensity recreational uses. (Exhibit 11). We object to the design of the proposed development as it does nothing to promote the Los Angeles River orientation.</p> <p>The Community Plan requires the density and design of development to be in proximity to station stops. We object to the design of the proposed development as it places all residential development as far away from the metro station as possible, eliminates easy access to the metro station by proposing to eliminate the east/west road and proposes public vehicular access to the station be through the torturous route of Buddy Holly Drive to Hotel Drive to Universal Hollywood Drive .</p> <p>The Community Plan requires that the development establish design features that continue the early California Spanish style of architecture found at the Campo de Cahuenga transit site. We object to the design of the proposed development as it is not in keeping with the provisions of the Community Plan. (Exhibit 13)</p>

Page	Paragraph	Item - Universal City Specific Plan	Comment
35 and 36	Section 4 4.1 Items A and B	Design Standards – Height Zones, Height Exceptions and Sight Coverage, Massing and Height	We object to the density and height permitted in this proposed specific plan and to the inclusion of Height Exceptions within this proposed specific plan. No Height Exceptions should be included.
38	Section 4 4.1 Items B number 5 and 6	Design Standards – Screening of Rooftop equipment from above is not required. Screening of outdoor storage areas from views from above is not required	Screening of Rooftop equipment and outdoor storage areas from above shall be required as it will be within the view of existing uses.
38	Section 4 4.1 Items C numbers 2 and 3	Design Standards – Setbacks and Landscape Buffers	We object to the incorporation of height exceptions within this proposed specific plan.
38	Section 4 4.1 Items C number 4	Design Standards – Setbacks and Landscape Buffers – New buildings within Planning Subarea 1 shall be located at least 12 feet from the channel wall of the Los Angeles River.	Any new buildings in Planning Subarea 1 must conform to the provisions of the Los Angeles RIO Master Plan without exception.
38	Section 4 4.1 Item D number 1	Design Standards – Visual Standards - no southeasterly facing Exterior Balconies shall be permitted above a height of 820 feet.	Buildings of this height create density and massing that is excessive. No balconies should be allowed at all in this area. We object to any building above two stores in this area as it will significantly increase the congestion at the immediately surrounding intersections which already show an LOS of F and block views.
38	Section 4 4.1 Item D number 2	Design Standards – Visual Standards – Unscreened rooftop parking.	All rooftop parking must be screened.
39	Section 4 4.1 Item D number 4	Design Standards – Visual Standards – Appendix 2. Design Guidelines	<p>We object to the use of the design guidelines included in Appendix 2 as they define as a planning goal the creation of an urban community. An urban setting is not consistent with the suburban scale and character of the surrounding community. The San Fernando Valley is generally a suburban and rural area and not an urban area.</p> <p>We object to the inclusion of a Mid-rise/High-rise Town Center and two Mid-rise/High-rise Residential Areas in an area that is suburban in nature and located at a choke point of the 101 Freeway at the throat of the Cahuenga Pass.</p>

Page	Paragraph	Item - Universal City Specific Plan	Comment
39	Section 4 4.1 Item D number 4	Design Standards – Visual Standards – Appendix 2. Design Guidelines	<p>At a time when there is no demonstrative need for additional residential housing in Los Angeles in general and the San Fernando Valley in particular, there is no need to build housing that is not in keeping with the scale and character of the surrounding suburban community. If any housing is permitted as part of this development at all it should be a Low-rise residential area only. California’s growth rate has declined to a modest 10% over the past 10 years and as a result, for the first time since the census taking in 1930, California did not get any additional congressmen (Exhibit 14)</p> <p>We object to the development of a Mid-rise/High-rise residential area that is 10 or more stories high that will block the protected views of the existing residential neighborhood which this proposed development will surround.</p> <p>The proposed inclusion of basement apartments in the design guidelines in an area where the water table has historically only 15 feet below the surface is not prudent. (Exhibit 15). We object to this inclusion of basement apartments in the design guidelines.</p>
39	Section 5 Items A, B, C, D and E	Parks and Open Space – Location/No Dedication Required/Fulfillment of Open Space Obligation	<p>We object to the inclusion of open space on rooftops.</p> <p>We object to the provision of the proposed specific plan that states “Required open space need not be dedicated to the City as publicly owned property.” Although we agree that the property owners association should be required to maintain the open space, the land should be dedicated to the City.</p> <p>Payment of fees in lieu of providing open space should not be permitted.</p>

Page	Paragraph	Item - Universal City Specific Plan	Comment
39	Section 5 Item F	Parks and Open Space - Implementation	Development of a phasing and implementation plan prior to the issuing of a building permit for a project is not sufficient. Specific requirements for the development and completion of parks and open space as each section of the project is completed must be included. The developer should be required to provide a performance bond at the time the open space plan is submitted. This should be in advance of the issuance of any building permits.
40	Section 6	Street System	The fundamental conceptual flaw in the street system is that the east/west road in the northern portion of the project site, which is currently a paper road (Exhibit 16) may be eliminated. The elimination of this road causes the majority of the traffic from the proposed residential area to exit onto Barham Blvd or to cross the project area through the use of the torturous route of Buddy Holly Drive to Hotel Drive to Universal Hollywood Drive. Elimination of the east/west road is not acceptable.
40	Section 6 D	Street lighting	No guidelines for street lighting could be located in Appendix No. 2, Design Guidelines as is stated on page 40.
40	Section 7	Transportation and Parking	Comments on Transportation and Parking are included in a separate section of this document.
48	Section 9.3	Sign Districts	We do not agree with the creation of the six sign districts as part of this specific plan. The only signage that should be permitted in the specific plan area should be those that are in compliance with the 2002 Los Angeles City Sign Ordinance. For safety reasons and for protections of views no signs should be allowed on roofs. No offsite signage, supergraphics or animated signs should be allowed at all.

Page	Paragraph	Item - Universal City Specific Plan	Comment
73	Section 11	Protected Trees	<p>The DEIR refers the reader to Appendix No. 5 – Master Protected Tree Map. The 4 maps that are included therein show that removal of hundreds of protected trees would be permitted by the specific plan. Many of these trees are heritage trees with huge canopies that could take a hundred years to grow. Allowing removal and replacement of these trees with seedlings and 1 gallon container trees as would be permitted under Section 11 C.1.b of this proposed specific plan is not acceptable.</p> <p>Los Angeles is one of the top ten dirtiest cities in America in terms of air quality. (Exhibit 17) Removal of hundreds of large canopy, heritage trees, that are fundamental to absorption of carbon dioxide and creation of oxygen, should not be permitted.</p>
76	Section 11 C.2.c	Pay an in lieu fee of \$700 for each removed Protected Tree	Payment of an in lieu fee for the removal of a Protected Tree should not be allowed. Tree replacement shall not be allowed outside the specific plan area.
77	Section 11 C.4	Exemptions – all trees other than the Coast Live Oak, California Sycamore and the California Black Walnut are not subject to any other tree regulations established by the Municipal Code or City Policy and may be removed.	We do not agree with this exemption. All provisions of the Municipal Code and City Policy must be followed with respect to trees not specifically covered in this specific plan.
77	Section 12 B item 1	Lighting – New Light Sources	<p>Animated, moving, programmed, flashing, neon, LCD and similar technologies of lighting displays or installations should not be permitted if such lighting is visible from the 101 Freeway or any of the existing residences in the surrounding communities.</p> <p>Such light sources are intrusive and diminish the quality of life of the residents in the surrounding communities.</p>

Page	Paragraph	Item - Universal City Specific Plan	Comment
77	Section 12 B item 10.f	Lighting – Exceptions	Light Sources associated with Outdoor Special Light Effects should not be permitted if such lighting is visible from the 101 Freeway or any of the existing residences in the surrounding communities.
79	Section 13 A Item 1.	Sound Attenuation	Sound Attenuation regulations should apply not only to existing residential areas but should also apply to any residences which are constructed as part of the proposed project.
79	Section 13 A Item 1.a and 1.b	Sound Attenuation	<p>Sound Attenuation regulations should be in accordance with the guidelines of the General Plan. Noise levels of L_{70} of 70 dBA should not be allowed. Continuous levels of 70dBA or higher can cause loss of hearing. As stated in the General Plan, all noise should be reduced or managed to achieve or maintain healthful ambient sound levels. Noise levels of 70dBA are normally unacceptable see General Plan Exhibit 1 Guideline for Noise compatible Land Use (Exhibit 18)</p> <p>Permitting night time noise levels between the hours of 10:00 PM and 7:00AM in a residential area equivalent to heavy traffic in a commercial district is not acceptable.</p>
80	Section 13 B Item 1	Sound Attenuation - Exemptions	Exempting all production activities from the provisions of the noise regulations of this specific plan and from the provisions of the Municipal Code is not acceptable.
80	Section 13 C Item 1	Construction and Grading Sound Requirements	The use of vibro hammers or similar equipment should not be permitted in any construction within this specific plan area.

Page	Paragraph	Item - Universal City Specific Plan	Comment
82	Section 15	Substantial Compliance Analysis	<p>We do not agree with the proposal to replace the Project Permit Compliance provisions of Section 11.5.7.C of the Municipal Code. This will eliminate local community input by enabling applicants bypass all local area decision makers such as the Area Planning Commission and go directly to the City Planning Commission. (Page 82 Section 15.1 and 15.2) This would prevent important outreach and input from local organizations such as neighborhood councils and resident associations as well as the neighboring stakeholders who would be most affected. We are not aware of this provision included in any other current specific plan ordinances.</p>
82	Section 15 A Item 3	Substantial Compliance with Guidelines	<p>We disagree with the concept of substantial compliance as it vests too much power in the Director. Community input must be obtained. It is not sufficient to allow the Director to determine that the intent and purpose of the applicable Guidelines are met. The opinion of the Director must be based on community input obtained through the hearing process.</p> <p>This section should be eliminated and the regular planning process including public hearings and review by the Area Planning Commission should be followed.</p>
82	Section 15 A Item 4	Ministerial Review	<p>We object to the definition of the Substantial Compliance Analysis as a Ministerial Review process.</p> <p>This section should be eliminated and the regular planning process including public hearings and review by the Area Planning Commission should be followed.</p>
83	Section 15 Item 1 through 5	Exempt Uses	<p>Other than the Existing Uses permitted by Section 3.4 of this Specific Plan none of the other uses listed should be defined as an exempt use.</p>

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83	Section 15.2	Other Specific Plan Procedures	<p>We object to the inclusion of this provision as it reduces transparency and reduces local community input.</p> <p>This section should be eliminated and the authority of the Area Planning Commission should be retained by it and not transferred to the City Planning Commission.</p>
		Universal Studios Specific Plan	<p>Due to the voluminous nature of the DEIR and the limited time allowed for the submission of comments, a detailed review and analysis of the provisions of the Universal Studios Specific Plan has not been undertaken. Therefore, all comments related to the Universal City Specific Plan should be considered to be applicable to any comparable provision of the Universal Studios Specific Plan.</p>
			<p>Conclusion: The Specific Plans are an attempt to circumvent most of the sign and other regulations of the municipal code and to thwart local community input into the planning process. We object to their adoption as part of the entitlement process for the Project Site.</p>

**STUDIO CITY NEIGHBORHOOD COUNCIL
COMMENTS ON TRAFFIC IMPACTS OF THE PROJECT**

(Continued on next page)

Page	Paragraph	DEIR Item	Comment
45	2(A)(1)(i)	<p>Environmental Impacts Construction: Construction traffic and/or construction activities could cause travel delays on an intermittent basis during build out of the Project. Potential impacts associated with physical construction of the Project would be limited to those locations immediately adjacent to or those within the Project Site. The most notable of these impacts would occur with the widening of Lankershim Boulevard, Barham Boulevard, and Buddy Holly Drive, which would require a temporary reduction in lane capacity (one lane in one direction) and would cause delays for vehicles traveling in that direction.</p>	<p>Delays along Lankershim will cause traffic delays for the Island Neighborhood of Studio City, yet Studio City is not identified in the DEIR as an impacted community.</p> <p>The Island Neighborhood of Studio City has one point of ingress and egress and would be heavily impacted by the construction activities on Lankershim Blvd.</p>
45	2(A)(1)(i)	<p>Delays from additional construction traffic and/or construction activities at other locations are not expected to cause substantial inconvenience to auto travelers, but would be noticeable to commuters who regularly use the streets adjacent to the Project Site.</p>	<p>Please define “substantial inconvenience to auto travelers.”</p>
45	2(A)(1)(i)	<p>During Project construction some temporary sidewalk closures at limited locations may also occur. Notwithstanding, pedestrian activity around the Lankershim Boulevard and Universal Hollywood Drive/Universal Terrace Parkway intersection would be maintained throughout the construction of the Project. Sidewalk closures are concluded to constitute a less than significant impact due to the temporary nature of the impact as well as the impact occurring at only limited locations.</p>	<p>Construction activities might increase the use of the Metro system and add additional pedestrian traffic in this area. Additionally, the Project’s program of encouraging offsite construction parking and use of mass transit will increase pedestrian traffic during construction and more so on a permanent basis. A tunnel was planned to go under Lankershim to accommodate safe pedestrian access to the Metro Red Line as part of the Red Line Construction and Metro Universal Project. A pedestrian overpass or tunnel should be part of the mitigation required for the Universal Evolution project.</p>

Page	Paragraph	DEIR Item	Comment
46	2(A)(1)(ii)	<p>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/transit credits. With the incorporation of Transportation Demand Management trip reductions, 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. The Project's Transportation Demand Management program thus reduces the Project's trip generation by 8,343 daily trips, including approximately 741 morning peak hour trips and 853 afternoon peak hour trips. The Study Area for the Project's traffic analysis encompasses a geographic area of approximately 50 square miles, and is generally bounded by Burbank Boulevard in North Hollywood and Burbank on the north, Santa Monica Boulevard in West Hollywood and Hollywood on the south, Buena Vista Street and Forest Lawn Drive on the east, and Sepulveda Boulevard in Sherman Oaks on the west.</p>	<p>When were the traffic studies and trip generation studies completed? There have been more than 600 housing units completed in Studio City since 2007.</p> <p>When were the traffic counts taken? Additionally, the City of Burbank's traffic study points out the TDM trip reductions are far too generous and that in fact the Metro Station requires either a buss transfer or a long walk (uphill) to reach the destination of the theme park, the residential district or the retail district and may not even qualify for Rapid Transit credits. SEE APPENDIX 1.</p>
46	P #3	<p>Of the 148 unsignalized intersections during the morning peak hour in 2030, before taking into account the Project's Transportation Demand Management program and other mitigation measures, the Project is forecasted to result in significant impacts at 20 intersections operating at Level of Service C or Level of Service D; 13 intersections operating at Level of Service E; and 36 intersections operating at Level of Service F. During the afternoon peak hour in 2030, the Project is expected to result in significant impacts at 14 intersections operating at Level of Service C or Level of Service D, 12 intersections operating at Level of Service E, and 39 intersections operating at Level of Service F.</p>	<p>Half of the 148 signalized study intersections would be significantly impacted. Does this include those located in the City of Burbank?</p> <p>The number of intersections operating at very low levels of service (E or F) is unacceptable. The Project should be scaled back so this does not occur.</p> <p>It is not acceptable that E or F LOS intersections are not improved.</p>

Page	Paragraph	DEIR Item	Comment
47	P #2	Taking into account the Transportation Demand Management trip reductions and mitigation, impacts at eight (8) of these unsignalized intersections would be reduced to a less than significant level. Therefore, Project impacts at only the Lankershim Boulevard & Jimi Hendrix Drive (Intersection 73) unsignalized intersection would be significant after implementation of Transportation Demand Management trip reductions and mitigation.	This is a critical intersection and this should be signalized at the least.
47	P #3	In addition to analyzing all 164 signalized and unsignalized intersections per Los Angeles Department of Transportation's methodology, intersections located in other jurisdictions (e.g., City of Burbank, City of West Hollywood, etc.) were analyzed using the methodology and significance thresholds of the jurisdiction wherein the intersection is located.	When was this analyzed?
48 258	P #2 P (ii)	The Project would result in significant impacts to four freeway segments during the morning peak hour and seven freeway segments during the afternoon peak hour before Transportation Demand Management trip reductions and mitigation. Even with implementation of the identified mitigation measures, significant impacts would remain at six freeway segments.	On page 258, Freeway Segments 4, 5 & 10 all significantly impact Studio City and should be mitigated to less than significant . The Project should not result in any significant impacts on any freeway segments. Such freeway segments are already too congested and impacted.
48	P #4	Based on the Project's traffic analysis, nine neighborhoods were identified that may be subject to neighborhood traffic intrusion impacts. After Transportation Demand Management trip reductions and sub regional and regional highway improvements, five neighborhoods have the potential to experience neighborhood intrusion impacts. With implementation of the Project's proposed mitigation, the Project's potential significant neighborhood impact could remain significant and no other feasible mitigation was identified.	No neighborhood in Studio City is identified as an impacted neighborhood; however the Island Neighborhood west of Lankershim and the hillside community south of Ventura and west of Lankershim and the Ventura corridor including Radford, Laurel Canyon and Whitsett are all impacted.

Page	Paragraph	DEIR Item	Comment
48	P #4	Neighborhood traffic intrusion impacts continued.	There should be a bicycle/pedestrian path along the river. The original east/west road along the river must remain.
49	P #49 Table 41 Items 5, 6 Table 42 Items 5,6	Supplemental Caltrans Analysis	The Project should not move forward without the needed freeway improvements. Whether the freeway improvements are funded by the Project or CalTrans, the freeway improvements are needed before the project is built and occupied.
49	P #2	Under the Project, a number of entry points to the Project Site would be available. All new on-site driveway locations from City streets would be required to conform with City standards and would be required to provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. Signalization meeting City standards would be provided at the Project access locations requiring signalization to provide for proper vehicular and bicycle movement controls. Thus, the Project would not substantially increase hazards to pedestrians, bicyclists, or vehicles and a less than significant impact would occur.	There is significant shuttle, bicycle, pedestrian and vehicular traffic all concentrated at the Metro station. There should be greater safety measures taken for bicycle and pedestrian traffic including a tunnel or overpass.
52	P #2	Neighborhood Intrusion	Significant and unavoidable neighborhood intrusion in the Studio City Island Neighborhood and areas south of Ventura Blvd and west to Colfax Avenue are unacceptable.
53	P #2	(4) Project Design Features and Mitigation Measures	All mitigation measures shall be guaranteed by NBC Universal and/or its parent company and all successor owners. The must alleviate the significant cumulative impacts at the analyzed freeway segments.

Page	Paragraph	DEIR Item	Comment
54	P #1	If any of the traffic mitigation measures within the City of Los Angeles or any other jurisdiction are determined to be infeasible or necessary permits/approvals to implement the mitigation measures cannot be obtained, then a significant impact (or impacts) may remain.	The City should not let developers off the hook for the mitigation. If mitigation is not feasible and significant impacts remain, the Project should be scaled back so there are no unavoidable impacts.
54	2	All traffic mitigation measure improvements within the responsibility and jurisdiction of public agencies other than the City of Los Angeles shall be monitored through the Los Angeles Department of Transportation and implemented to the extent feasible. If improvements within the responsibility and jurisdiction of public agencies other than the City of Los Angeles (i.e., City of Burbank, City of West Hollywood, Caltrans, etc.) cannot be implemented, significant traffic impacts may remain at such locations.	Residential portions of the project should not move forward without the completion of all traffic mitigation measures including all CalTrans improvements within the Cahuenga Pass from Highland to Vineland and all other mitigations.
55	Project Design Feature B-2	North/South Road	The inclusion of the north/south road accommodates the housing and circulation within the project; however it does not provide regional benefit. The east/west road along the river must be included as project mitigation.
58	(A) Sharing of Mitigation Measures	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.	The sharing of the mitigation measures and credits contemplates multiple ownerships of the NBC Universal Evolution Project and the Metro Universal Project. The obligations for mitigation must be joint and several with NBC Universal and/or its parent company backstopping the cost for the improvements. NBC Universal shall guarantee improvements adjacent to the Metro Universal Project and mitigations shall not be shared.

Page	Paragraph	DEIR Item	Comment
59	Mitigation Measure B-1	The Project Applicant or its successor shall implement the following: <input type="checkbox"/> Provide one articulated bus to be operated by Metro to supplement the Metro Rapid 750 service (capacity = 66 seated of 75 standing); and <input type="checkbox"/> Pay the net 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 of the bus's operation and shall pay for the unsubsidized portion of these costs for an additional seven years of the bus's operation. Firebox revenues and state/federal transit subsidies shall be credited against operation and maintenance costs for years 1 through 10 of the bus' operation.	How do we know that one bus is sufficient? When and how was the study done? The Project should consider an assessment district on all portions of the Project to pay for ongoing bus mitigation for more than 5 years. The Ventura/Cahuenga Boulevard Corridor Specific Plan prohibits increased LOS at intersections and added traffic on Ventura and Cahuenga.
60	Mitigation Measure B-2.	The shuttle system shall be guaranteed for 20 years. The final shuttle routes shall be subject to LADOT approval. The shuttle systems, routes, stops, headways, and hours of operation shall be reviewed periodically and may be modified with LADOT approval.	The Project should consider an assessment district on all portions of the Project to pay for ongoing bus mitigation for more than 5 years.
61	Mitigation Measure B-4	The Project Applicant or its successor shall construct or contribute to.....	Project Applicant or its successor shall construction and not just contribute to.
61	Mitigation Measure B-4 a.	Relocation of the existing Hollywood Freeway southbound onramp east of Fruitland Drive at Ventura Boulevard to the intersection of Fruitland Drive and Ventura Boulevard;	Eliminate neighborhood intrusion and pass through traffic to neighborhoods south of Ventura from Lankershim to Vineland.
61	Mitigation B-4 b.	Construction of a new southbound off-ramp to Ventura Boulevard connecting to Ventura Boulevard at its intersection with the above relocated Hollywood Freeway southbound onramp at Fruitland Drive;	This dumps traffic on to Ventura/Cahuenga Blvd which is prohibited pursuant to the Ventura/Cahuenga Blvd. Corridor Specific Plan.
61	Mitigation B-5	The Project Applicant or its successor shall widen and restripe Barham Boulevard from Forest Lawn Drive/Lakeside Plaza Drive to provide three continuous southbound lanes, two northbound lanes, and left-turn pockets to minor streets throughout the length of the roadway section from Forest Lawn/Lakeside Plaza Drive in the north to Buddy Holly Drive/Cahuenga Blvd (East) in the South.	All the traffic coming south will bottleneck at the Barham bridge over US101. The proposal to widen Barham is inadequate and not feasible. How will the widening be accomplished and who will pay for it?

Page	Paragraph	DEIR Item	Comment
64	Mitigation B-8	<p><i>Vineland Avenue & Moorpark Street (Intersection 11):</i> The Project Applicant or its successor shall implement or contribute to the implementation of a southbound right-turn lane so that the Vineland Avenue southbound approach would have a left-turn lane, three through lanes, and a right-turn lane. In order to enhance safety by improving visibility, the improvement also includes removal of the raised medians on the north and south legs of the intersection to better align the northbound and southbound left-turn pockets.</p>	<p>Increasing the traffic capacity of this intersection will increase the traffic along Moorpark westbound all the way past Laurel Canyon. Moorpark is one lane in most areas. The signals between Vineland and Laurel Canyon are old and cannot be synchronized. These signals must be upgraded as part of the mitigation to avoid severe traffic (especially in front of Oakwood School) due to the restructuring of the southbound 101 off ramp on Tujunga a few blocks away dumping traffic onto Tujunga that will end up on Moorpark turning left to go towards Vineland in the area. Moorpark should be widened East/West Tujunga to Cahuenga.</p>
65	Mitigation B-13	<p><i>Cahuenga Boulevard & Moorpark Street (Intersection 30):</i> The Project Applicant or its successor shall implement or contribute to the implementation of a northbound right-turn lane so that the Cahuenga Boulevard northbound approach would have a left-turn lane, two through lanes, and a right-turn lane. However, this proposed physical mitigation is in conflict with a recent plan adopted for Cahuenga Boulevard that proposes to downgrade Cahuenga Boulevard from Secondary Highway standards to Collector Street standards. Therefore, per the Los Angeles Department of Transportation direction, this analysis conservatively assumes that the proposed physical improvement would not be implemented.</p>	<p>According to the DEIR and in the Traffic Mitigation plans, Cahuenga is a major feeder street into the Project area. If there is a plan to downgrade Cahuenga from Secondary Highway standards to a Collector Street, how can that allow for Cahuenga (as a collector street) to function as a major feeder street for the project?</p>

Page	Paragraph	DEIR Item	Comment
66	Mitigation B-18	<p><i>Barham Boulevard and Cahuenga Boulevard (Intersection 47):</i> The Project Applicant or its successor shall implement or contribute to the widening of the Cahuenga Boulevard westbound approach to provide an additional through lane to match the existing westbound departure. This improvement requires use of Caltrans right-of-way. If this right-of-way is not available, a significant impact would remain at this intersection in the afternoon peak hour. The Project’s impact at this intersection in the morning peak hour is fully mitigated by the local shuttle from Lakeside Plaza Drive to Hollywood.</p>	<p>Barham and Cahuenga Boulevards are already at a stand still during much of the day. If this improvement needs the use of CalTrans right-of-way and there is a possibility that the right-of- way is not granted, then that issue needs to be resolved prior to the start of construction of the Project. If the right-of-way is not granted, other options must be implemented to avoid a significant impact at this intersection.</p> <p>Barham cannot be widened.</p>
66	Mitigation B-19	<p><i>Barham Boulevard and Buddy Holly Drive/Cahuenga Boulevard (Intersection 48):</i> The Project Applicant or its successor shall (1) widen the Cahuenga Boulevard westbound approach to provide a separate left-turn only lane, and (2) add a southbound right-turn lane so that the Barham Boulevard southbound approach would have three through lanes and a right-turn lane.</p>	<p>This mitigation facilitates many more cars at the intersection of Barham and Cahuenga at the existing bottleneck of the Barham Bridge crossing the 101 freeway from Cahuenga East to Cahuenga West without solving the problem of upgrading or expanding the bridge which is necessary to carry the increased traffic that will cross it.</p>

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67	Mitigation B-22	<p><i>Ventura Freeway eastbound on-ramp & Riverside Drive (Intersection 15):</i> The Project Applicant or its successor shall: (1) implement or contribute to the implementation of signalization of the intersection with protected left-turn phasing for the eastbound approach; (2) implement or contribute to the implementation of restriping the west leg of the intersection to provide an additional eastbound left-turn lane so that the Riverside Drive eastbound approach has dual left-turn lanes and two through lanes; and (3) install or contribute to the implementation of a crosswalk on the east leg of the intersection. It should be noted that the satisfaction of a traffic signal warrant shall not in itself require the installation of a signal. The decision on whether a traffic signal should be installed will be made by the City of Los Angeles Department of Transportation and Caltrans at the time of the proposed improvement taking into consideration other factors such as spacing with adjacent signalized intersections and interruption to traffic flow along the major street. Depending on the spacing of adjacent signalized intersections and the traffic flow, it may not be feasible to install a signal at the unsignalized intersection.</p>	<p>(1) The applicant shall implement the required mitigation.</p> <p>(2) The applicant shall implement the required mitigation.</p> <p>(3) Applicant shall implement mitigation if mitigation is found to be necessary and crosswalk should have pedestrian strobe lighting in the street.</p>
67	Mitigation B-23	<p><i>Cahuenga Boulevard & Ventura Freeway eastbound ramps (Intersection 28):</i> The Project Applicant or its successor shall widen or contribute to the widening of the Ventura Freeway eastbound off-ramp to provide a 14-foot wide left-turn lane, a 12-foot wide shared left/right-turn lane, and one 14-foot right-turn lane.</p>	<p>Applicant shall implement mitigation.</p>
67	Mitigation B-24	<p><i>Cahuenga Boulevard & Hollywood Freeway northbound off-ramp (Intersection 68):</i> The Project Applicant or its successor shall: (1) widen or contribute to the widening of the Hollywood Freeway northbound off-ramp to provide an additional right-turn lane, and (2) relocate or contribute to the relocation of the crosswalk on Cahuenga Boulevard from the north leg of the intersection to the south leg.</p>	<p>Applicant shall implement mitigation. Crosswalk should have pedestrian strobe lights in the street.</p>

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67	Mitigation B-25	<p><i>Tujunga Avenue and Hollywood Freeway southbound off-ramp (Intersection 157):</i> The Project Applicant or its successor shall signalize the intersection with permitted left-turn phasing for the southbound approach. It should be noted that the satisfaction of a traffic signal warrant shall not in itself require the installation of a signal. The decision on whether a traffic signal should be installed will be made by the City of Los Angeles Department of Transportation and Caltrans at the time of the proposed improvement taking into consideration other factors such as spacing with adjacent signalized intersections and interruption to traffic flow along the major street. Depending on the spacing of adjacent signalized intersections and the traffic flow, it may not be feasible to install a signal at the unsignalized intersection.</p>	<p>This mitigation is one block north of the intersection Tujunga Ave and Moorpark St. in Studio City. The signals on Moorpark from Laurel Canyon to Cahuenga and on Tujunga from the off ramp to Ventura Blvd are old and do not allow for phasing. Additionally, the southbound approach on Tujunga to Moorpark is one thru lane and a right turn lane with no left turn signal. Any mitigation improvement of the off ramp must include signal upgrading along Moorpark and Tugunga. If a signal is put in at the off ramp, the cross walk should have strobe lights for pedestrian protection.</p>
68	Mitigation B-26	<p><i>Cahuenga Boulevard & Hollywood Freeway southboundramps (Intersection 162):</i> The Project Applicant or its successor shall install or contribute to the signalization of the intersection with permitted left-turn phasing for the southbound approach. It should be noted that the satisfaction of a traffic signal warrant shall not in itself require the installation of a signal. The decision on whether a traffic signal should be installed will be made by the City of Los Angeles Department of Transportation and Caltrans at the time of the proposed improvement taking into consideration other factors such as spacing with adjacent signalized intersections and interruption to traffic flow along the major street. Depending on the spacing of adjacent signalized intersections and the traffic flow, it may not be feasible to install a signal at the unsignalized intersection.</p>	<p>Project applicant shall be responsible for implementation of mitigation.</p>

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68	Mitigation B-27	<i>Pass Avenue & Verdugo Lane (Intersection 75):</i> The Project Applicant or its successor shall provide or contribute to the implementation of additional signal equipment to connect the intersection to the City of Burbank’s Traffic Signal Interconnect & Signal Timing System and Citywide Signal Control System.	Project applicant shall be responsible for implementation of mitigation.
68	Mitigation B-28	<i>Evergreen Street/Riverside Drive & Alameda Avenue (Intersection 77):</i> The Project Applicant or its successor shall provide or contribute to the provision of additional signal equipment to connect the intersection to the City of Burbank’s Citywide Signal Control System. Additional mitigation in response to the Burbank Analysis is as follows. The Project Applicant or its successor shall implement or contribute to the implementation of a widening of the Riverside Drive eastbound approach to provide dual right-turn lanes.	Project applicant shall be responsible for implementation of mitigation.
69	Mitigation B-29	<i>Pass Avenue & Ventura Freeway eastbound off-ramp (Intersection 78):</i> The Project Applicant or its successor shall provide or contribute to the provision of additional signal equipment to connect the intersection to the City of Burbank’s Traffic Signal Interconnect & Signal Timing System and Citywide Signal Control System.	Project applicant shall be responsible for implementation of mitigation.
69	Mitigation B-30	<i>Pass Avenue & Alameda Avenue (Intersection 79):</i> The Project Applicant or its successor shall: (1) provide or contribute to the provision of additional signal equipment to connect the intersection to the City of Burbank’s Citywide Signal Control System, and (2) implement or contribute to the implementation of a westbound right-turn lane so that the Riverside Drive westbound approach would have a left-turn lane, two through lanes, and a right-turn lane.	Project applicant shall be responsible for implementation of mitigation.

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69	Mitigation B-30	Additional mitigation in response to the Burbank Analysis is as follows. The Project Applicant or its successor shall: (1) implement or contribute to the implementation of restricting the northbound leftturn movement from Pass Avenue onto westbound Alameda Avenue, and (2) implement or contribute to the implementation of extending the dual left-turn lanes on the Pass Avenue southbound approach at the intersection of Pass Avenue & Riverside Drive to the intersection of Pass Avenue & Alameda Avenue.	Project applicant shall be responsible for implementation of mitigation.
69	Mitigation B-31	<i>Pass Avenue & Riverside Drive (Intersection 80):</i> The Project Applicant or its successor shall implement or contribute to the implementation of an eastbound right-turn lane so that the Riverside Drive eastbound approach would have a left-turn lane, two through lanes, and a right-turn lane. Additional mitigation in response to the Burbank Analysis is as follows. The Project Applicant or its successor shall: (1) implement or contribute to the implementation of a right-turn lane so that the Riverside Drive westbound approach would have a left-turn lane, two through lanes, and a right-turn lane, and (2) provide or contribute to the provision of additional signal equipment to connect the intersection to the City of Burbank’s Citywide Signal Control System.	Project applicant shall be responsible for implementation of mitigation.
69	Mitigation B-32	<i>Pass Avenue & Olive Avenue (Intersection 81):</i> The Project Applicant or its successor shall: (1) implement or contribute to the implementation of an additional northbound left-turn lane so that the Pass Avenue northbound approach would have dual left-turn lanes and three through lanes, and (2) provide or contribute to the provision of additional signal equipment to provide overlapping right turn arrow signal indications for eastbound Olive Avenue.	Project applicant shall be responsible for implementation of mitigation.

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70	Mitigation B-33	<i>Olive Avenue & Warner Brothers Studios Gate 2/Gate 3 (Intersection 82):</i> The Project Applicant or its successor shall provide or contribute to the provision of additional signal equipment to connect the intersection to the City of Burbank’s Citywide Signal Control System.	Project applicant shall be responsible for implementation of mitigation.
70	Mitigation B-34	<i>Olive Avenue & Warner Brothers Studios Gate 1/ Lakeside Drive (Intersection 83):</i> The Project Applicant or its successor shall implement or contribute to the implementation of an eastbound right-turn lane so that the Lakeside Drive eastbound approach would have a shared through/left lane and a right-turn lane. Additional mitigation in response to the Burbank Analysis is as follows. The Project Applicant or its successor shall provide or contribute to the provision of additional signal equipment to connect the intersection to the City of Burbank’s Citywide Signal Control System.	Project applicant shall be responsible for implementation of mitigation.
70	Mitigation B-35	<i>Hollywood Way & Alameda Avenue (Intersection 84):</i> Additional mitigation in response to the Burbank analysis is as follows: The Project Applicant or its successor shall provide or contribute to the implementation of additional signal equipment to connect the intersection to the City of Burbank’s Traffic Signal Interconnect & Signal Timing System and Citywide Signal Control System.	Project applicant shall be responsible for implementation of mitigation.
70	Mitigation B-36	<i>Hollywood Way & Olive Avenue (Intersection 86):</i> Additional mitigation in response to the Burbank analysis is as follows: The Project Applicant or its successor shall provide or contribute to the implementation of additional signal equipment to connect the intersection to the City of Burbank’s Traffic Signal Interconnect & Signal Timing System and Citywide Signal Control System.	Project applicant shall be responsible for implementation of mitigation.

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70	Mitigation B-37	<i>Olive Avenue & Riverside Drive (Intersection 87):</i> Additional mitigation in response to the Burbank analysis is as follows: The Project Applicant or its successor shall provide or contribute to the implementation of additional signal equipment to connect the intersection to the City of Burbank’s Traffic Signal Interconnect & Signal Timing System and Citywide Signal Control System.	Project applicant shall be responsible for implementation of mitigation.
71	Mitigation B-38	<i>Ventura Freeway westbound on-ramp and Alameda Avenue (Intersection 164):</i> The Project Applicant or its successor shall signalize the intersection with protected left-turn phasing for the eastbound approach. Due to the close proximity of this intersection with the intersection of Hollywood Way & Alameda Avenue (Intersection 84), the signals at the two intersections would need to be coordinated. It should be noted that the satisfaction of a traffic signal warrant shall not in itself require the installation of a signal. The decision on whether a traffic signal should be installed will be made by the City of Burbank and Caltrans at the time of the proposed improvement taking into consideration other factors such as spacing with adjacent signalized intersections and interruption to traffic flow along the major street. Depending on the spacing of adjacent signalized intersections and the traffic flow, it may not be feasible to install a signal at the unsignalized intersection.	Project applicant shall be responsible for implementation of mitigation.

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71	Mitigation B-39	<p><i>Hollywood Freeway northbound on-ramp & Moorpark Street (Intersection 161):</i> This improvement includes signalization of the intersection with permitted left-turn phasing for the eastbound approach. The closest signalized intersection is approximately 430 feet from this location and hence this improvement would not create closely-spaced intersections. Signal warrant worksheets are provided in Appendix M of the transportation Study. As shown in the signal warrants, the intersection does not meet signal warrants with the traffic projections in 2030. Based on consultation with Los Angeles Department of Transportation, this intersection would be monitored and the Applicant or its successor shall install or contribute to the installation of a signal would be installed when traffic volumes warrant the signalization of the intersection. A significant Project impact would remain at this intersection until the signal is installed.</p>	<p>This mitigation is one block from Oakwood School and as mentioned in many other sections of this response, the amount of increased traffic on this section of Moorpark is tremendous. A significant impact is unacceptable in any event, particularly in this case. This mitigation must have priority and must be done without significant impact or the project must be scaled back to a level that will not cause a significant impact in this intersection.</p>
72	Traffic Flow and Safety Program: Left Turn Signals	<p>Project has agreed to implement left-turns at key intersections in the vicinity of the Project Site in an effort to improve traffic flow and safety along the corridors as conditions warrant. If the traffic volumes at the intersections meet left-turn phasing warrants, the Project would pay for the installation of the left-turn signals at these intersections. The Project will conduct periodic reviews of left-turn conditions during the implementation of the intersection improvements to determine if left-turn phasing is warranted. It should be noted that these improvements are not required to mitigate the Project's impacts.</p>	<p>All periodic studies and reviews of left-turn conditions must be based on current traffic volume studies. If the studies show that left turn signals are required, the applicant will install such mitigations in a timely manner working with the city in determining the order of intersection mitigation.</p> <p>Current numbers should be used not numbers from 2007.</p>

Page	Paragraph	DEIR Item	Comment
72	Traffic Flow and Safety Program: Left Turn Signals	<p>The following locations have been identified for left-turn signals:</p> <p>11. Vineland Avenue & Moorpark Street – eastbound approach</p> <p>17. Riverton Avenue/Campo de Cahuenga Way & Ventura Boulevard – westbound approach</p> <p>19. Lankershim Boulevard & Riverside Drive – eastbound approach</p> <p>20. Lankershim Boulevard & Moorpark Street – northbound and eastbound Approaches</p> <p>26. Cahuenga Boulevard & Camarillo Street – all approaches</p> <p>28. Cahuenga Boulevard & SR 134 eastbound ramps – southbound approach</p> <p>30. Cahuenga Boulevard & Moorpark Street – northbound and southbound Approaches</p> <p>34. Lankershim Boulevard & Valleyheart Drive/James Stewart Avenue – northbound approach</p> <p>116. Radford Avenue/Ventura Place & Ventura Boulevard – eastbound and westbound approaches</p> <p>117. US 101 southbound on-ramp/Fruitland Drive & Ventura Boulevard –westbound approach</p> <p>140. Lankershim Boulevard & Chandler Boulevard (North) – northbound approach</p>	<p>Intersections 11, 116, and 117 all impact Studio City neighborhoods. The DEIR does not identify Studio City as having any neighborhoods impacted and this must be corrected. Those Studio City neighborhoods that are impacted must receive impaction mediation as needed.</p>

Page	Paragraph	DEIR Item	Comment
72	Traffic Flow and Safety Program: Left Turn Signals	Based on discussions with the Los Angeles Department of Transportation, as part of this program, the Project would also fund the installation of a traffic signal at the intersection of Strohm Avenue & Riverside Drive to make it safer for motorists to turn into and out of Strohm Avenue. This signal would also help in reducing traffic from side streets	Those Studio City neighborhoods that are impacted must receive impact mediation as needed.
73	(E) Hollywood Event Management Infrastructure	One of the seven major components of the Project's transportation improvement and mitigation program is the implementation of a Transportation System Management program in the form of improvements to the Hollywood Event Management infrastructure. This Project improvement would consist of the installation of signs that would provide motorists on arterial streets leading up to Hollywood from other parts of the region with advance information and warning regarding lane closures due to events in Hollywood, accidents, etc. This information would help the motorists in using alternative routes of travel thus avoiding long delays and preventing further congestion. As such, the Applicant or its successor shall pay for up to five changeable message signs as part of the Hollywood Event Management infrastructure. It should be noted that these improvements are not required to mitigate the Project's impacts.	The applicant should consult with the Department of Transportation as to the proper number of event signs required and the geographical placement of those signs to insure that this mitigation is sufficient. These signs shall not impact existing uses in the area.
73	Los Angeles County Congestion Management Plan Freeway Segment Improvements	No feasible mitigation measures beyond those identified above are available to address Project impacts to Los Angeles County Congestion Management Plan freeway segments.	Some Freeway segments are significantly impacted as a result of the Project after all mitigation occurs. This is unacceptable and the project must be scaled back to a point that will not cause any freeway significant unavoidable impacts.
74	(H) Regional Transit System Capacity Impacts	With implementation of the mitigation measures identified above, all of the significant Project impacts related to the regional transit system would be reduced to a less than significant level. No additional mitigation is required.	We question the use of one bus to supplement the mass transit system and the time frame for the subsidies tied to it. Shuttle time frames may not be sufficient.

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74	Mitigation B-40	<p>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 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.</p>	<p>All construction parking should occur on site.</p>
74-75	Mitigation B-41	<p>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:</p> <ol style="list-style-type: none"> 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; 	<p>Construction parking configuration should be completely on site.</p> <p>Construction hauling should not take place during peak hours.</p> <p>No construction traffic will be allowed on residential streets.</p> <p>No construction related vehicles will be in residential neighborhoods at any time. Pedestrian safety is critical during and after construction at the main entrance and all other entrances along Lankershim. Additional pedestrian safety mitigations need to be implemented, such as a bridge or completion of the Metro Tunnel. Construction traffic, including hauling, cannot take place during peak hours or on residential streets. The Ventura/ Cahuenga Blvd. Corridor Specific Plan prohibits hauling on Ventura and Cahuenga Boulevards.</p>

Page	Paragraph	DEIR Item	Comment
74-75	Mitigation B-41	<p>8. Provision of safety precautions for pedestrians and bicyclists through such measures as alternate routing, and protection barriers;</p> <p>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;</p> <p>10. Schedule construction-related deliveries, other than concrete and earthwork-related deliveries to reduce travel during peak travel periods;</p> <p>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.;</p> <p>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;</p> <p>13. Obtain a Caltrans transportation permit for use of oversized transport vehicles on Caltrans facilities; and</p> <p>14. Submit a traffic management plan to Caltrans for approval to avoid potential access restrictions to and from Caltrans facilities.</p>	<p>The applicant will provide funds to the Department of Transportation in the amount necessary to fund the Transportation Neighborhood Traffic Management Plan as per the requirements and specifications of the Los Angeles Department of Transportation. Additionally, the applicant will correct the list of communities set forth in Appendix E-1 of the DEIR to correctly identify all the communities affected including Studio City.</p>

Page	Paragraph	DEIR Item	Comment
75 – 76	Mitigation B-42	<p>Pursuant to the schedule established in the final adopted sub phasing program, the Applicant or its successor shall provide funding pursuant to a mechanism, reasonably acceptable to the Los Angeles Department of Transportation in an amount up to \$500,000 for implementation of the Los Angeles Department of Transportation’s Neighborhood Traffic Management Plan process for the Project set forth in Appendix E-1 of this Draft EIR. Eligible communities shall include the residential neighborhoods within the boundaries listed below and as shown in Figure 82:</p> <ul style="list-style-type: none"> a. Riverside Drive to the north, Cartwright Avenue to the east, Landale Street/Woodbridge Street to the south, and Vineland Avenue/Lankershim Boulevard to the west; b. Kling Street to the north, Lankershim Boulevard to the east, the SR 134 freeway to the south, and Vineland Avenue to the west; c. Sarah Street to the north, Ledge Avenue/Placidia Avenue to the east, Valley Spring Lane/Moorpark Street to the south, and Cahuenga Boulevard to the west; d. Franklin Avenue to the north, El Cerrito Place to the east, Yucca Street to the south, and La Brea Avenue to the west; and e. The neighborhood on the west side of Orange Drive between Franklin Avenue and Hawthorn Avenue. 	<p>Further studies must be conducted to determine if a significant impact would remain after the neighborhood intrusion mitigation is complete. It is unacceptable to leave residential neighborhoods significantly impacted by traffic in residential neighborhoods due to over development of the Project.</p>
75 – 76	Mitigation B-42	<p>Implementation of the improvements may reduce the neighborhood intrusion impacts to less than significant. However, as discussed above at this time it is not known whether a particular community will elect to implement a particular set of mitigation measures or if the agreed upon measures will reduce the impacts to less than significance. Therefore, it is conservatively concluded that mitigation of the potential neighborhood intrusion impact will not be feasible and a significant traffic intrusion impact in the identified neighborhoods would remain.</p>	<p>Further studies must be conducted to determine if a significant impact would remain after the neighborhood intrusion mitigation is complete. It is unacceptable to leave residential neighborhoods significantly impacted by traffic in residential neighborhoods due to over development of the Project.</p>

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76	Project Access (Operational)	Due to physical constraints, no mitigation measures beyond those identified above are available that would fully mitigate the Project's access impacts to less than significant	It is unacceptable for the Project to have permanent significant impacts at its access points, especially when a large residential neighborhood (the Island Neighborhood in Studio City) is directly across the street and that neighborhood is dependant on one street for egress and ingress. That access street is connected to and dependant on the main entry points of the project directly.
76	Bicycle, Pedstrian & Vechicular Safety Impacts	No significant impacts related to bicycle, pedestrian and vehicular safety were identified, and no mitigation measures are recommended.	The bicycle, pedestrian, auto (entrance & exit) along with the shuttle service all end up at the same spot across the street from the Metro station. This creates an unsafe environment for the pedestrians and a bridge or tunnel should be constructed for pedestrians to use. Additionally, there should be an addition bicycle path running east west along the river to allow an additional exit for riders and walkers to exit further up Lankershim beyond the Project access points. This one exit at this point on Lankershim is unacceptable. The East/West road at the northern lot line is necessary.
76	Mitigation B-43	The Project Applicant or its successors shall make a fair-share contribution as determined by Caltrans toward any improvements to the study on- and off-ramps that would mitigate the Project's on- and off-ramp impacts and that are implemented by the year 2030.	The applicant must be responsible for the entire cost of the study.

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77	Mitigation B-44	The Project Applicant or its successors shall make a fair-share contribution as determined by Caltrans toward any improvements to the study freeway segments that would mitigate the Project’s freeway segment impacts and that are implemented by the year 2030.	Applicant must have all costs for mitigating freeway impacts in place as CalTrans may not (probably will not) have the funds to contribute. According to the traffic studies included in this DEIR, there are 6 freeway segments that are significantly impacted – even with all mitigation in place – some of which are the 101 north of Campo de Cahuenga, 101 south of Barham and the 101 east of the 405, all of which surround the project. As a result, the project should be scaled back to a point that there would be no significant freeway impacts as a result of the project.
81	Paragraph 3	<p>The Project’s sub-phasing plan ties the implementation of the traffic improvements proposed as part of the Project with the developments in different zone groups. The following zone groups have been identified for this analysis:</p> <ol style="list-style-type: none"> 1. Zone A – Studio/Business Areas 2. Zone B – Entertainment Area 3. Zone C - Mixed-Use Residential Area 4. Zones A & B – Studio/Business and Entertainment Areas 5. Zones B & C – Entertainment and Mixed-Use Residential Areas 6. Zones A & C – Studio/Business and Entertainment Areas 7. Zones A, B, & C – Studio/Business, Entertainment, and Mixed-Use Residential Areas 	The Project speaks of Applicant & Successors Traffic Mitigation Responsibilities in various aspects of the Project, additionally; the phasing, sub phasing and zones appear to contemplate separate ownership and a division of responsibility. There will likely be multiple successor developers and/or owners in various portions of the project including studio, hotel, theme park, residential, mixed use and retail segments.

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81	Paragraph 3	The Project’s sub-phasing plan ties the implementation of the traffic improvements proposed as part of the Project with the developments in different zone groups.	<p>NBC Universal and its parent company shall remain joint and severally liable along with its successor owners for all mitigation measure and required project improvements. This must hold true regardless of the phasing, sub phasing and zone classification of the traffic improvements. In addition, should the mixed use/residential portion be delayed, stalled or its ownership become insolvent, the studio/business area ownership and entertainment ownership shall install all traffic mitigation measures allocated to the mixed use /residential ownership.</p> <p>The residential use must be eliminated as all impacts are unavoidable impacts.</p>
82	Paragraph 1	Some of the transportation improvements proposed as part of the Project are shared with the proposed Metro Universal project. The Project’s sub phasing plan identifies these improvements and their expected implementation date based on the proposed Metro Universal project phasing plan if that project proceeds. 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, in the identified phase, and be reimbursed by the proposed Metro Universal Project if and when that project is built. The implementation of these shared improvements would be determined based on the need for the improvement with respect to the net new trip generation and traffic impacts of the Project per the sub-phasing plan.	<p>The applicant must be prepared to finance all mitigation required without the participation of the Metro Project. There is no clear schedule for the Metro Project and it may be scaled back or not built at all, which if not planned for would create an immense problem for the residents and commuters in the region.</p> <p>Shared mitigations are unacceptable unless all unavoidable impacts are eliminated from both projects.</p>

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82	Paragraph 4	<p><i>(5) Level of Significance After Mitigation</i></p> <p>All traffic mitigation measures within the City shall be completed to the satisfaction of the Los Angeles Department of Transportation. If any of the traffic mitigation measures within the City of Los Angeles or any other jurisdiction are determined to be infeasible or necessary permits/approvals to implement the mitigation measures cannot be obtained, then a significant impact (or impacts) may remain.</p>	<p>The Project should be scaled back to a size that would not leave a significant impact after mitigation.</p>
83	(1) Construction	<p>Project impacts related to in-street construction would be less than significant.</p>	<p>Rush hour traffic and resident traffic of the Island Neighborhood in Studio City will be severely impacted during in-street work on Lankershim Blvd.</p>
83	(A) Intersection Level Of Service	<p>With implementation of the Transportation Demand Management program, regional and sub-regional transportation improvements, and specific intersection improvements, significant and unavoidable impacts would remain at the following nine intersections:</p> <p>(i) Intersection 22: Hollywood Freeway northbound ramps & Campo de Cahuenga Way – afternoon peak hour; Intersection 23: Metro Driveway & Campo de Cahuenga Way – afternoon peak hour; (ii) Intersection 29: Cahuenga Boulevard & Riverside Drive – both peak hours; (iii) Intersection 30: Cahuenga Boulevard & Moorpark Street – both peak hours; (iv) Intersection 33: Lankershim Boulevard & Cahuenga Boulevard – morning peak hour; (v) Intersection 35: Lankershim Boulevard & Main Street – afternoon peak hour; (vi) Intersection 36: Lankershim Boulevard & Campo de Cahuenga Way/Universal Hollywood Drive – morning peak hour; (vii) Intersection 73: Lankershim Boulevard & Jimi Hendrix Drive - afternoon peak hour; and (viii) Intersection 82: Olive Avenue & Warner Brothers Studios Gate 2/Gate 3 – afternoon peak hour.</p>	<p>It is not acceptable to have any significant and unavoidable impacts from this project, and these significant and unavoidable impacts are unacceptable. Of the 9 listed, 4 are on Lankershim in front of the Project and two others are across the street. These impacts will affect the Island Neighborhood in Studio City (across the street from the Project) in a very negative way permanently. Those intersections are 22, 23, 33, 35, 36, and 73.</p>

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84	Paragraph 2	<p>An incremental increase in the Vehicle-to-Capacity ratio would occur at the 16 study freeway segments that can be attributed to the Project after the implementation of the Transportation Demand Management program, regional and sub-regional transportation improvements, and specific intersection improvements during the weekday morning and afternoon peak hours, respectively. With implementation of these mitigation measures, significant impacts would remain at the following six freeway segments:</p> <p>Segment 1: Hollywood Freeway south of Alvarado Street – afternoon peak hour (southbound); Segment 2: Hollywood Freeway south of Vermont Avenue – afternoon peak hour (southbound); Segment 3: Hollywood Freeway south of Santa Monica Boulevard –afternoon peak hour (southbound); Segment 4: Hollywood Freeway south of Barham Boulevard – morning peak hour (northbound and southbound) and afternoon peak hour (southbound); Segment 5: Hollywood Freeway north of Campo de Cahuenga Way –afternoon peak hour (northbound); and Segment 10: SR 170 north of Magnolia Boulevard – afternoon peak hour (north bound).</p>	<p>Any freeway significant impact as a result of the scope of the Project is unacceptable. The Project should be scaled back to a point that mitigation of traffic actually works.</p> <p>Affects Studio City Directly</p> <p>Affects Studio City Directly</p>
84 – 85	(D) Neighborhood Impacts	<p>Mitigation measures have been identified to address the Project’s neighborhood intrusion impacts and the identified improvements would be applied to the boundaries of the identified neighborhoods to ensure that the cut-through traffic diverted from these neighborhoods moves to the neighboring arterial and collector streets and does not result in a neighborhood traffic intrusion impact within another neighborhood. Implementation of the improvements may reduce the neighborhood intrusion impacts to less than significant.</p>	<p>Applicant must redefine the neighborhoods impacted. Studio City is not listed as an impacted Community, even though traffic mitigation is taking place on Lankershim Blvd, across the street from the Island Neighborhood and from Fruitland and Ventura.</p>

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84 – 85	(D) Neighbor- hood Impacts	At this time it is not known whether consensus would be reached on the implementation of mitigation measures or if the agreed upon measures would reduce the impacts to less than significance, to be conservative, it is concluded that mitigation of the potential neighborhood intrusion impacts would not be feasible. Therefore, it is conservatively concluded that a significant traffic intrusion impact in the identified neighborhoods would remain.	This which will affect the neighborhood south of Ventura from Lankershim to Vineland and many other Studio City streets and intersections. It is unacceptable to leave any neighborhood with significant impact due to the scope of the Project.
85	(E) Project Access	Implementation of the identified mitigation measures would reduce impacts with regard to Project access. However, Project impacts related to Project access would remain significant at the following two access locations: 1. Lankershim Boulevard and Campo de Cahuenga Way/Universal Hollywood Drive – both morning and afternoon peak hours; and 2. Barham Boulevard and Lakeside/Forest Lawn Drive – both peak hours. Therefore, Project access impacts would be significant and unavoidable	This can be downgraded by the construction parking being kept on site and the inclusion of the original East/West road that runs along the river giving greater access to the Project both during the construction and after completion.
85	(G) Supplemental Caltrans Analysis	With the implementation of the mitigation measures identified in the section, Project impacts to on- and off-ramp locations would be reduced to less than significant levels; whereas weaving impacts would be reduced, but not to a less than significant level. No additional mitigation measures beyond those identified for on- and off-ramp and weaving impacts are required to address Project impacts. However, if Caltrans does not implement improvements to reduce impacts on the on- and off-ramps and freeway segments that would be affected by the Project, the Project’s on- and off-ramp and weaving impacts would remain significant and unavoidable .	The applicant should plan on financially backstopping any and all CalTrans freeway and all on/off ramp mitigation. Additionally, the Project must be reduced in scope to eliminate any unavoidable significant impacts after all mitigation measures have been implemented.

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86	(B) Parking	During construction of the Project, an adequate number of on-site parking spaces would be available at all times or the Project would provide a shuttle to an off-site parking location for the construction workers. Therefore, Project construction would result in a less than significant impact with regard to the availability of parking spaces.	All construction parking must be on site during all phases.
87	(B) County Specific Plan	The proposed County Specific Plan requirements provide for equal or more parking than that required by the Los Angeles County Code. The required parking for Project development is approximately 6,785 spaces. The Project includes 6,304 parking spaces for development under the proposed County Specific Plan. Considering the number of existing parking spaces, the number of parking spaces that would be added as part of the interim projects, the number of parking spaces that would be removed during the Project’s demolition phases, and the number of proposed additional parking spaces, the Project would result in a surplus of 1,912 parking spaces at Project build out, based on the parking requirements outlined in the proposed County Specific Plan. Thus, the Project would provide sufficient parking to accommodate the proposed development within the County’s jurisdiction. Therefore, Project impacts related to parking under the proposed County Specific Plan would be less than significant .	On site construction parking must be supplied during all phases of the build out of the Project, not just at completion of the build out of the Project.
2343 - 2448	IV. Summary of Significant and Unavoidable Impacts	B. Individual Environmental Issues 1. Traffic a. Construction Project impacts with regard to lane and sidewalk closures are concluded to be less than significant . However, it is conservatively concluded that significant cumulative impacts with regard to lane and temporary sidewalk closures along Lankershim Boulevard only would occur if the sidewalk closures along Lankershim Boulevard from the proposed Metro Universal project and the proposed Project occurred at the same time.	There is no way to tell if the Metro Project will overlap with the Evolution Project, however, given the 21 year time lime of the Evolution Project it is safe to say there will be overlap with Metro or other proposed projects in the area.

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2343 - 2448	IV. Summary of Significant and Unavoidable Impacts	<p>B. Individual Environmental Issues</p> <p>1. Traffic</p> <p>a. Construction - Continued</p> <p>This conclusion primarily results from the duration of the proposed Metro Universal project’s potential impacts, as Project impacts would be limited in location, as well as being intermittent and temporary. While significant lane closure impacts have the potential to occur, the permit process utilized by the Los Angeles Department of Transportation that the Project would follow is designed to minimize this type of impact (i.e., minimize the potential for multiple lane closures due to the implementation of mitigation measures in the same area at the same time).</p> <p>b. Operations <i>(1) Roadway Intersections</i> 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 intersection impacts, significant and unavoidable impacts would remain at the following roadway intersections:</p> <p>Intersection 22: Hollywood Freeway northbound ramps & Campo de Cahuenga Way – afternoon peak hour;</p> <p>Intersection 23: Metro Driveway & Campo de Cahuenga Way – afternoon peak hour;</p> <p>Intersection 29: Cahuenga Boulevard & Riverside Drive – both peak hours;</p> <p>Intersection 30: Cahuenga Boulevard & Moorpark Street – both peak hours;</p> <p>Intersection 33: Lankershim Boulevard & Cahuenga Boulevard – morning peak hour;</p>	<p>Any Significant or Unavoidable Impact that remains after the mitigation of the Project is unacceptable. The community should not suffer lasting Significant Impacts as a result of the project. Any Significant Impacts to Pedestrian, Intersection, freeway off ramps, freeway weaving and Neighborhood Intrusion are avoidable by reducing the size of the Project.</p> <p>Significant Impacts are avoidable by reducing the size and design of the Project. The Project must be reduced and redesigned to not impose Significant Impacts on the surrounding communities.</p> <p>The Intersections that will have remaining Significant Impacts as a result of the project that effect Studio City are #'s 22, 23, 35, 36, and 73. All of these intersections are directly related to the main entrance to Universal and are directly in front of the Metro Station and the Studio City Island Neighborhood. Commuter traffic on Lankershim and Cahuenga will be incredibly affected, and as a result, the Metro Project and the Evolution Project must not under any circumstances take place at the same time.</p>

Page	Paragraph	DEIR Item	Comment
2343 - 2448	IV. Summary of Significant and Unavoidable Impacts	<p>B. Individual Environmental Issues</p> <p>1. Traffic</p> <p>a. Construction - Continued</p> <p>Intersection 35: Lankershim Boulevard & Main Street – afternoon peak hour;</p> <p>Intersection 36: Lankershim Boulevard & Campo de Cahuenga Way/Universal Hollywood Drive – morning peak hour;</p> <p>Intersection 73: Lankershim Boulevard & Jimi Hendrix Drive – afternoon peak hour; and</p> <p>Intersection 82: Olive Avenue & Warner Brothers Studios Gate 2/Gate 3 – afternoon peak hour.</p> <p>In addition to the specific locations identified above, it is important to note that if any of the traffic mitigation measures within the City of Los Angeles or any other jurisdiction are determined to be infeasible as discussed in Section IV.B.1, Traffic Access – Traffic/Circulation, of this Draft EIR, or necessary permits/approvals to implement the mitigation measures cannot be obtained, then a significant impact (or impacts) may remain. Furthermore, if implementation of any measure is delayed, a significant impact would also occur until the implementation of the measure.</p> <p>Cumulative conditions would result in significant impacts at several intersections and the proposed Project would contribute to these impacts. Thus, the Project’s contribution to impacts under future cumulative conditions would be considerable, and cumulative impacts would be significant at these intersections. While the Project’s mitigation measures would reduce several of the significant impacts to a less than significant level, some of the impacts would remain significant and unavoidable.</p>	

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2343 - 2448	IV. Summary of Significant and Unavoidable Impacts	<p><i>(2) Los Angeles County Congestion Management Plan</i></p> <p>With implementation of the project design features and mitigation measures, significant Project and cumulative impacts would remain at the following seven freeway segments:</p> <p>Segment 1: Hollywood Freeway south of Alvarado Street – afternoon peak hour (southbound);</p> <p>Segment 2: Hollywood Freeway south of Vermont Avenue – afternoon peak</p> <p>Segment 3: Hollywood Freeway south of Santa Monica Boulevard – afternoon peak hour (southbound);</p> <p>Segment 4: Hollywood Freeway south of Barham Boulevard – morning peak hour (northbound and southbound) and afternoon peak hour (southbound);</p> <p>Segment 5: Hollywood Freeway north of Campo de Cahuenga Way – afternoon peak hour (northbound); and</p> <p>Segment 10: SR 170 north of Magnolia Boulevard – afternoon peak hour (northbound).</p> <p><i>(3) Neighborhood Intrusion Impacts</i></p> <p>Proposed project design features and mitigation measures may reduce the Project’s significant neighborhood intrusion impacts to a less than significant level. However, as at this time it is not known whether consensus would be reached on the implementation of mitigation measures or if the agreed upon measures would reduce the impacts to less than significance, to be conservative, it is concluded that mitigation of the potential neighborhood intrusion impacts would not be feasible and a significant Project and cumulative traffic intrusion impact would remain.</p>	<p>Freeway segments 4, 5 and 10 affect the main entrance to Universal, the Metro Station, the Studio City Island Neighborhood and Ventura Blvd as well as Cahuenga Blvd. This is unacceptable and the project must be scaled back or redesigned to not have a significant or unavoidable impact.</p> <p>All Neighborhood Intrusion mitigation measures must be agreed upon in advance of any mitigation measures being approved. The Impacted Neighborhoods need to have a voice in the mitigation measures to be utilized and the list of neighborhoods impacted must include Studio City. Not only is the Island Neighborhood impacted, but Ventura Blvd from Lankershim to Tujunga as well as Lankershim Blvd South area to Wrightwood & Fruitland streets as well as Vineland south of Ventura.</p>

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		<p><i>(4) Project Access</i> Implementation of the identified mitigation measures would reduce impacts with regard to Project access. However, Project and cumulative impacts related to Project access would remain significant at the following two access locations:</p> <ol style="list-style-type: none"> 1. Lankershim Boulevard and Campo de Cahuenga Way/Universal Hollywood Drive – both peak hours; and 2. Barham Boulevard and Lakeside Plaza Drive/Forest Lawn Drive – both peak hours. <p><i>(5) Supplemental Caltrans Analysis</i> Caltrans requested that the Project impact analysis include an evaluation of the Project's potential effects on both on- and off-ramps, and on weaving/merging operations along those freeway segments to which the Project would add the most traffic. With the implementation of the project design features and mitigation measures, Project impacts to on- and off-ramp locations would be reduced to less than significant levels; whereas weaving impacts would be reduced, but not to a less than significant level. No additional mitigation measures beyond those identified for on- and off-ramp and weaving impacts are required to address Project impacts. However, if Caltrans does not implement improvements to reduce impacts on the on- and off-ramps and freeway segments that would be affected by the Project, Project and cumulative on- and off-ramp and weaving impacts would remain significant and unavoidable. This conclusion also applies to the Project's No Annexation scenario.</p>	<p>The budget for Neighborhood Intrusion Mitigation will not have a cap on its cost (as it does in the DEIR of \$500,000), but rather will be fully funded by the applicant in agreement with the surrounding Neighborhoods</p> <p>The applicant must be responsible for any freeway and/or on & off ramp mitigation to include weaving and shall not rely on CalTrans for any financial participation.</p> <p>If the applicant cannot reduce the impacts of freeway weaving and on and off ramp impaction, the applicant must scale back the project to a point that the freeway system, including on and off ramps can handle</p>

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636	File IV.B.1 Traffic /Access- Traffic/Circulation	2. Option I – The haul trucks exiting the Project Site would head west on Buddy Holly Drive and then south on Universal Studios Boulevard, turn left at Cahuenga Boulevard (West), turn left at the US Highway 101 southbound on-ramp, proceeding to State Route 60 East to exit the freeway at the Crossroad Parkway (South) to Puente Hills Landfill, Hacienda Heights, California. On the return route to the Project Site, the trucks would exit US Highway 101 North at Buddy Holly Drive.	The Ventura/Cahuenga Boulevard Corridor Specific Plan prohibits hauling on Cahuenga or Ventura Blvds.
636	Paragraph 4	The projected level of haul truck traffic, in conjunction with the mitigation measures proposed below, is not expected to result in a significant traffic impact. With regard to haul truck traffic, outside of the peak hours, the projected level of haul-truck traffic would not adversely affect street operations because of the reduced levels of traffic volumes present during these times. The proposed routes would utilize Forest Lawn Drive, Cahuenga Boulevard (West), Universal Studios Boulevard, and/or Buddy Holly Drive to access the freeways. Forest Lawn Drive and Cahuenga Boulevard (West) are classified as Major Highway Class II in the City of Los Angeles' General Circulation Plan and are designed to accommodate the projected level of truck traffic.	The Ventura/Cahuenga Boulevard Corridor Specific Plan prohibits hauling on Cahuenga or Ventura Blvds. Hauling is prohibited during peak traffic hours.
733 – 737	Table 17 Traffic & Circulation	Analyzed Intersections SEE ATTACHMENT #1	Of the 164 Intersections analyzed, 34 of them are in Studio City and 3 others are within one block of Studio City, thus their impact will affect Studio City. However, Studio City is not listed as an Impacted Neighborhood. There is no way that any mitigation can take place at these intersections without neighborhood impactation in Studio City.

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733 – 737	Table 17 Traffic & Circulation	Analyzed Intersections - Continued SEE ATTACHMENT #1	<p>Studio City must be included as an Impacted Neighborhood and the amount of funds that are earmarked for Neighborhood Impaction must be increased. The Intersections in Studio City are as follows: #'s 1, 4, 5, 7, 14, 22, 23, 34-38, 72, 73, 108, 110-117, 144-149, 151, 157, 160 and 161. Many of these intersections are already rated at D-F and with growth projections will be worse by the project completion date of 2030. Additionally, some of these intersections AFTER MITIGATION will still be rated D-F, which is not acceptable. The project must be scaled back so that no significant impact of these intersections remains after mitigation.</p> <p>The 3 intersections near Studio City that have tremendous impact to Studio City are #'s 11, 109 & 158. The same conditions apply as the 34 intersections in Studio City and the same unacceptable significant impact cannot occur.</p>

Page	Paragraph	DEIR Item	Comment
738-746	Table 18	<p>Level of Service Definitions for Signalized Intersections (Critical Movement Analysis Method)</p> <p>SEE ATTACHMENT 2</p>	<p>Table 18 & 19 show the rating system for intersections. This information is necessary to understand the intersection and freeway ratings in the tables to follow.</p>
738	Table 19	<p style="text-align: center;">&</p> <p>Level of Service Definitions for Unsignalized Intersections (2000 Highway Capacity Manual Unsignalized Method)</p> <p>SEE ATTACHMENT 2</p>	
739-746	Table 20	<p>Existing Conditions Intersection Peak Hour Levels of Service</p> <p>SEE ATTACHMENT 3</p>	<p>Table 20: Of the 34 analyzed intersections in Studio City 6 are rated D-F with currently existing conditions, without growth calculated in. The data this is based on was gathered in 2007. 600 housing units have been completed in Studio City since that data was gathered, thus the ratings are likely incorrect. Those intersections are #'s 11, 14, 111, 115, 146, and 149. Many of these intersections even with mitigation will not improve. It also should be noted that just because an intersection already has a poor rating (D-F) does not mean that the increased traffic caused by the Project will not add to the congestion of the intersection and add to Neighborhood Impaction.</p>

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747	Table 21	<p data-bbox="511 233 1057 302">Future with Project Funded Improvements Conditions (Year 2030)</p> <p data-bbox="511 342 824 373">SEE ATTACHMENT 4</p>	<p data-bbox="1133 233 1479 338">Table 21 shows the ratings of Arterial Monitoring Stations.</p> <p data-bbox="1133 342 1479 562">Station #38 (Lankershim Blvd & Ventura Blvd/Cahuenga Blvd. is currently rated D am & C pm. and will degrade to E am & E pm.</p> <p data-bbox="1133 600 1479 1035">Station #115 (Laurel Canyon Blvd & Ventura Blvd) is currently Rated E am & E pm. and will degrade to F am & F pm. with the Project, including the TDM & funded improvements. If all the calculations are correct and the future planned developments does not exceed projections.</p> <p data-bbox="1133 1039 1479 1507">Additionally, the traffic data is dated 2007 and does not reflect current traffic data. There is no way these calculations and ratings are correct. It is unacceptable to degrade intersections to an F rating with the TDM and Funded Improvements. The Project must be scaled back as to not cause these intersections to degrade to the projected levels.</p>
748	Table 22	<p data-bbox="511 1514 1052 1583">Levels of Service Definitions for Freeway Segments</p> <p data-bbox="511 1623 824 1654">SEE ATTACHMENT 5</p>	<p data-bbox="1133 1514 1500 1766">Table 22 shows the rating system for freeway segments. This information is necessary to understand the intersection and freeway ratings in the tables to follow.</p>

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749 – 750	Table 23	<p>Existing Conditions – Freeway Segments Peak Hour Levels of Service</p> <p>SEE ATTACHMENT 6</p>	<p>Freeway Segment #5 (US 101 north of Campo de Cahuenga Way is currently rated C in the am peak hours in the North bound direction and E in the South bound direction. In the pm peak hours it is rated E & D. This freeway segment is already impacted without the Project, and it feeds traffic directly into the main entrances of the Project.</p> <p>Freeway Segment #6 (US 101 east of Coldwater Canyon Ave. is currently rated D in the North bound direction and E in the South bound direction during the am peak hours. During the peak pm hours is rated F(0) in the North bound direction and E in the South bound direction.</p> <p>This freeway segment is already extremely impacted and also feeds traffic directly into and out of the Project. The existing F(o) rating in the North bound in the pm peak hours is a night mare scenario when the office building section of the Project leaves work. There is no way this segment will circulate traffic in an efficient manner. This alone shows that the Project must be scaled back.</p>

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749 – 750	Table 23	Existing Conditions – Freeway Segments Peak Hour Levels of Service - Continued SEE ATTACHMENT 6	Freeway Segment #7 (US 101 East of the 405) is currently rated C in the North Bound direction and D in the South bound direction in the am peak hours and D in both the North and South bound directions in the pm peak hours.
756 - 769	Table 25	Trip Generation Estimates for Proposed Projects SEE ATTACHMENT 7	Table 25 shows all of the related projects that could affect the generated traffic in areas that will also affect the Project. The total number of projects is 256 totaling with a total of Trip Generations of 335,184 calculated by the applicant, though many of the proposed projects do not have trip generation estimates. Therefore, this number is a complete guess, though it is a given that the total trip generation number used by the applicant is on the low side and probably very low. Some of these projects are approved and some (most) are proposed. Although these projects are in the San Fernando Valley and on the West side, the 164 intersections studied are in the San Fernando Valley and on the west side as well, thus any project that affects any of the studied intersections or freeway segments affects the traffic and circulation for the Project.

Page	Paragraph	DEIR Item	Comment
756 - 769	Table 25	<p>Trip Generation Estimates for Proposed Projects - Continued</p> <p>SEE ATTACHMENT 7</p>	<p>We have only studied the projects that affect the Studio City area and the Ventura/Cahuenga pass. There are 67 projects that affect the area outlined above. 61 of those have a total of 111,357 estimated trips generated. That number of trips generated from the Project in the area described above will have a huge negative impact on Studio City. In addition, there are 6 proposed projects in the area above that do not have estimated trips generated, so the total trips generated number is low. The project must be scaled back in order to accommodate the street and freeway infrastructure.</p>
772- 778	Table 28	<p>Future Without Projects Conditions (Year 2030) Intersection Park Hour Levels of Service</p> <p>SEE ATTACHMENT 8</p>	<p>Table 28 shows the future (Year 2030 – completion date of the project) ratings in the am & pm of 164 Intersections. 30 of those intersections affect Studio City.</p> <p>Of those 30 intersections the projected ratings for the am peak hours are: 2 Rated D, 3 Rated E and 7 Rated F.</p> <p>Of those intersections the projected pm peak hours are: 4 Rated D, 3 Rated E and 9 Rated F.</p>

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772-778	Table 28	<p>Future Without Projects Conditions (Year 2030) Intersection Park Hour Levels of Service - Continued</p> <p>SEE ATTACHMENT 8</p>	<p>Keeping in mind that the traffic data was gathered in 2007 and that Studio City has completed 600 additional housing units since then it is safe to say that these figures are incorrect (lower traffic data than actual) and that the projections are not valid and in fact, the impact will be greater than estimated.</p> <p>As shown in previously presented charts (and more later on) the projects size makes the mitigations useless in many instances. The Project must be scaled back to accommodate the traffic infrastructure.</p>
779	Table 29	<p>Future Without Project Conditions (Year 2030) Freeway Segments Peak Hour Levels of Service</p> <p>SEE ATTACHMENT 9</p>	<p>This table shows that the following Freeway Segments will be severely impacted by the completion year of the Project without project conditions:</p> <p>Segment # 5 (US 101 north of Campo de Cahuenga Way) will be rated D in the am North bound and F(o) in the am Southbound. The rating for the pm peak hours is F(o) north bound and D South bound.</p> <p>Segment #6 (US 101 east of Coldwater Canyon Ave) am rating north bound is D and south bound is F(o), the pm ratings are F(o) north bound and F south bound.</p>

Page	Paragraph	DEIR Item	Comment
779	Table 29	<p data-bbox="511 233 1078 338">Future Without Project Conditions (Year 2030) Freeway Segments Peak Hour Levels of Service - Continued</p> <p data-bbox="511 380 824 411">SEE ATTACHMENT 9</p>	<p data-bbox="1133 233 1500 447">Segment #7 (US 101 east of I 405) the am rating is D North bound and E South bound. The pm ratings are F North bound and D South bound.</p> <p data-bbox="1133 489 1500 1136">These ratings show that the freeway system as it is, cannot handle additional traffic generated by the size of the Project. Additionally, as mentioned previously, the data the above ratings were based on is from 2007, prior to the completion of 600 additional housing units in Studio City, most of which will figure into the above freeway segments. The Project must be scaled down, even with the planned mitigation measures, to accommodate the freeway infrastructure.</p>
780 – 781	Table 30	<p data-bbox="511 1148 1078 1220">Project Site Trip Generation – Before TDM Trip Reduction</p> <p data-bbox="511 1262 841 1293">SEE ATTACHMENT 10</p>	<p data-bbox="1133 1148 1500 1545">This table shows 4,175,971 trips generated with the existing site plus Interim Developments, and 5,730,923 trips generated after build out. That is an increase of 1,554,952. This number of trips generated is impossible to handle even with the mitigation measures planned.</p>

Page	Paragraph	DEIR Item	Comment
801	Table 38	<p>Access Impact Analysis – Operational</p> <p>SEE ATTACHMENT 11</p>	<p>This table shows that many of the 164 intersections studied are more severely impacted even after the Project has instituted the TDM and future Funded Improvements.</p> <p>In particular intersection #36 (Lankershim Blvd / Campo de Cahuenga Way/Universal Hollywood Dr. It goes from an A in both the am and pm to an F in both the am & pm.</p> <p>Intersection #53 (Barham Blvd & Lakeside Plaza Dr/Forrest Lawn Dr degrades to an F rating in both am and pm peak hours and this is the point that the proposed north south road will be placed to serve as an entry to the residential portion of the Project.</p>
802 – 812	Table 39	<p>Future With Project With Funded Improvements Conditions (Year 2030) Intersection Peak Hour Levels of Service – Signalized Intersections</p> <p>SEE ATTACHMENT 12</p>	<p>This table shows which intersections show Residual Significant Impacts and which mitigation measures are shared with the Metro Project (also referred to as Project 65 in this DEIR).</p> <p>The intersections that show a Residual Significant Impact are:</p> <p>Intersection #22 (US 101 North Bound Ramps & Campo de Cahuenga Way)</p> <p>Intersection #23 (Metro Driveway & Campo de Cahuenga Way)</p>

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802 – 812	Table 39	<p data-bbox="511 233 1068 373">Future With Project With Funded Improvements Conditions (Year 2030) Intersection Peak Hour Levels of Service – Signalized Intersections - Continued</p> <p data-bbox="511 415 841 447">SEE ATTACHMENT 12</p>	<p data-bbox="1133 233 1479 338">Intersection # 35 (Lankershim Blvd & Main Street</p> <p data-bbox="1133 380 1503 558">and Intersection #36 (Lankershim Blvd & Campo de Cahuenga Way/Universal Hollywood Dr.)</p> <p data-bbox="1133 600 1503 1581">All of these intersections are located at the western main entrance of the project. Traffic from the hotels, theme park, City Walk and some of the office space including the shuttle connections all begin and end here. In addition, the bike path ends here and the Metro Station is directly across the street. This is extremely dangerous and will impact the Island Neighborhood, Campo De Cahuenga and the Metro Station all of which are in Studio City as well as the intersection of Ventura and Lankershim, which is already severely impacted. The Project must be scaled back. These intersections alone will make the access to the freeway and Ventura Blvd, as well as the Project impassible.</p>

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802 – 812	Table 39	<p data-bbox="511 233 1068 373">Future With Project With Funded Improvements Conditions (Year 2030) Intersection Peak Hour Levels of Service – Signalized Intersections - Continued</p> <p data-bbox="511 415 841 447">SEE ATTACHMENT 12</p>	<p data-bbox="1133 233 1503 957">The number of mitigation measures shared with the Metro Project total 32 intersections. There is no way of knowing if and when the Metro Project will ever be started let alone completed and what the Project will entail if it gets started. The applicant can not count on the Metro Project to share any mitigation measures and must fully fund all street and freeway mitigations without the possibility of sharing mitigation costs with the Metro Project or any other proposed project in the area.</p> <p data-bbox="1133 999 1503 1203">In fact the shared mitigation measures proposed for the Metro Project leave unavoidable impacts before adding the impact from the Porject.</p>
813- 815	Table 40	<p data-bbox="511 1220 1109 1398">Future Project With Funded Improvements Conditions (Year 2030), Los Angeles CEQA Thresholds Guide Methodology - Intersection Peak Hour Levels of Service – Unsignalized Intersections</p> <p data-bbox="511 1440 846 1472">SEE ATTACHMENT 13`</p>	<p data-bbox="1133 1220 1503 1833">This table shows that 3 additional unsignalized intersections are planned to be share with the Metro Project. Four intersections are listed as shared: Intersection #32 Cahuenga Blvd & Valley Spring Way; Intersection #72 Lankershim Blvd & Muddy Waters Dr.; Intersection # 73 Lankershim Blvd and Jimi Henndrix Dr.; Intersection # 159 US 101 South Bound Off Ramp & Riverside Dr.</p>

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813-815	Table 40	<p data-bbox="511 233 1110 411">Future Project With Funded Improvements Conditions (Year 2030), Los Angeles CEQA Thresholds Guide Methodology - Intersection Peak Hour Levels of Service – Unsignalized Intersections - Continued</p> <p data-bbox="511 453 846 485">SEE ATTACHMENT 13`</p>	<p data-bbox="1133 233 1505 808">There is no way of knowing if and when the Metro Project will ever be started let alone completed and what the Project will entail if it gets started. The applicant cannot count on the Metro Project to share any mitigation measures and must fully fund all street and freeway mitigations without the possibility of sharing mitigation costs with the Metro Project or any other proposed project in the area.</p>
816	Table 41	<p data-bbox="511 821 1049 957">Future with Project with Funded Improvements Conditions (Year 2030) Freeway Segments Levels of Service AM Peak Hours</p> <p data-bbox="511 999 841 1031">SEE ATTACHMENT 14</p>	<p data-bbox="1133 821 1505 1837">This table shows the capacities of the 16 Freeway Segments affected by the Project. Intersection # 5 (US 101 North of Campo de Cahuenga Way) & 6 US 101 East of Coldwater Canyon Ave) show that these segments in the future without the Project will be over capacity, and even worse after the Project with Funded Improvements. Again, the traffic data was gathered in 2007 which does not take into account the addition of 600 housing units in Studio City. This clearly indicates that the traffic placed on these two freeway segments that connect to the Project are intolerable for the infrastructure and the community. The Project must be scaled back to accommodate the freeway infrastructure.</p>

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818	Table 43	Regional Transit Impact Analysis SEE ATTACHMENT 15	The applicant stresses that they are performing mitigation measures to insure less traffic to the site both while under construction and afterward. However, the applicant proposes to add one Metro Rapid Bus (line 750 which travels along Ventura Blvd) to help with the traffic switched to rapid transit. This is inadequate as not all the rapid transit customers will go down Ventura Blvd. The applicant must do further traffic studies and invest more money in assisting the current transit system as needed in accordance with the DOT.
819	Figure 42	Study Area Division SEE ATTACHMENT 16	This map shows the area of the intersection study for the Project.
820-822	Figure 43A-43C	Study Area and Analyzed Intersections SEE ATTACHMENT 17	These maps show the locations of the intersections studied by the project.
	Figure 44A	Project Site & Adjacent Analyzed Intersections on Lankershim Blvd SEE ATTACHMENT 18	This map shows the locations of the intersections between the Lankershim/Cahuenga split and Ventura Blvd.
834-836	Figure 46A-46C	Existing Conditions Intersection Level of Service – AM Peak Hour SEE ATTACHMENT 19	This map shows the existing conditions on the intersections studied and show just how impacted these intersections already are. Many of these intersections affect Studio City in a negative way and this points out that the current infrastructure cannot handle the increased traffic caused by the Project. The Project must be scaled back to accommodate infrastructure capacities.

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837-839	Figure 47A-47C	<p>Existing Conditions Intersection Level of Service – PM Peak Hours</p> <p>SEE ATTACHMENT 20</p>	<p>This map shows the existing conditions on the intersections studied and show just how impacted these intersections already are. Many of these intersections affect Studio City in a negative way and this points out that the current infrastructure cannot handle the increased traffic caused by the Project. The Project must be scaled back to accommodate infrastructure capacities.</p>
840	Figure 48	<p>Existing Conditions Freeway Segment Peak Hour Traffic Volumes</p> <p>SEE ATTACHMENT 21</p>	<p>This map shows the freeway segments affected in peak hours. It also shows the total traffic counts during peak hours and illustrated that some segments are already at or near capacity, and that the freeway infrastructure cannot handle the amount of additional traffic the Project will place on these and other freeway segments.</p>
841	Figure 49	<p>Existing Conditions Freeway Segment of Service – AM Peak Hour</p> <p>SEE ATTACHMENT 22</p>	<p>This map clearly shows that there are impacted freeway segments rated below F currently – before the Project, and as stated earlier there will be freeway segments at the Project site that will be rated F or below after mitigations. The freeway infrastructure cannot handle increased traffic from the Project.</p>

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842-846	Figure 50	<p>Existing conditions Freeway Segment Level of Service – PM Peak Hour</p> <p>SEE ATTACHMENT 23</p>	<p>This map clearly shows that there are impacted freeway segments rated below F currently – before the Project, and as stated earlier there will be freeway segments at the Project site that will be rated F or below after mitigations. The freeway infrastructure cannot handle increased traffic from the Project.</p>
847	Figure 52	<p>Location of Related Projects</p> <p>SEE ATTACHMENT 24</p>	<p>This Map shows the proposed projects around the study area. It is obvious, especially since we have no way of knowing which projects will be approved and what they will look like, that the applicant’s Project cannot be built at the scale they are proposing. Some of these other projects will be built and the traffic ramifications of those are unknown.</p>
848	Figure 53	<p>Future Base Roadway Improvements (Year 2030)</p> <p>SEE ATTACHMENT 25, 25A & 25B</p>	<p>This map shows the improvements planned by the year of completion of the Project. Interestingly enough, Barham Blvd. does not appear to be marked as widened as the Project proposes. Why is Barham not widened? There is some skepticism as to the widening of Barham, that it will actually be approved, and that it will not additionally impact the bridge over the freeway from Barham to Cahuenga</p>

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848	Figure 53	<p>Future Base Roadway Improvements (Year 2030) - Continued</p> <p>SEE ATTACHMENT 25, 25A & 25B</p>	<p>Additionally, the original East/West road that is to run along the LA River is not on the map. The East/West road is a necessity to relieve traffic from Lankershim just above the Project and carry it to Lakeside Plaza and Forrest Lawn Dr.</p>
40	<p>Appendix A-1 Proposed City of Los Angeles Specific Plan</p>	<p>The Specific Plan street system will serve to separate the types of traffic by destination and minimize co-mingling of resident, visitor, and service traffic via two types of roadways:</p> <p>(1) primary access roads, and (2) internal streets or driveways.</p> <p>STREET SYSTEM</p> <p>A. Primary Access Roads.</p> <p>1. The primary access roads to the Studio Production District are Lankershim Boulevard, Universal Hollywood Drive, and Universal Studios Boulevard.</p> <p>2. The primary access roads to the Mixed-Use Universal City District and Open Space District Nos. 1, 2, and 3 are Barham Boulevard, Buddy Holly Drive,</p>	<p>The original East/West Road that was to run along the LA River, which is mapped out on the Highway General Plan- County of Los Angeles – SEE ATTACHEMENT 3 – and on the Google Maps diagram – SEE ATTACHMENT 4, must remain part of the Project. This road will relieve traffic from Lankershim at the critical intersection of Cahuena and allow traffic to circumvent the 5 entrances on Lankershim and access Barham Blvd at Forest Lawn Drive. Additionally, this road will give access to the proposed Residential Section without having to use Barham Blvd, which will already have increased traffic due to the Project.</p>

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41	Section 7.2	<p>REQUIRED TRAFFIC IMPROVEMENTS:</p> <p>A. Phasing plan. Prior to the issuance of the first Substantial Compliance Analysis approval for the first Project developed under this Specific Plan, the Applicant shall submit a Traffic Mitigation Phasing Plan (TMPP) to the Department of Transportation for approval. The Plan shall identify which improvements must be constructed in connection with individual development sites. The Department of Transportation, in consultation with the Director and the Applicant, may modify the approved TMPP, if he or she determines the TMPP to be infeasible.</p> <p>C. Guarantee of traffic improvements.</p> <p>1. Prior to the issuance of a building permit for a Project, the Applicant shall guarantee, to the satisfaction of the Department of Transportation, the construction of any required traffic improvements for the Project.</p>	<p>In no event shall the TMPP (Transportation Mitigation Phasing Plan) be modified by the Project Director or the DOT as to allow a significant impact to remain after the Project is completed.</p> <p>Applicant shall be financially responsible for all traffic mitigations without State, Federal, county or city funds.</p>
42	Section 7.3	<p>RESIDENTIAL PARKING REQUIREMENTS</p> <p>Automobile parking regulations for residential uses shall be as follows:</p> <p>A. Single-Family Dwellings. Single-Family Dwellings, single-family detached condominiums, and cooperatives. There shall be two covered off-street parking spaces on the same lot for each Dwelling Unit. No guest parking shall be required.</p> <p>B. Two-Family Dwellings (Duplexes). There shall be two off-street parking spaces on the same lot for each Two-Family Dwelling Unit. At least one of these parking spaces shall be covered. No additional guest parking shall be required.</p>	<p>½ Guest parking space shall be provided per Dwelling.</p> <p>½ Guest parking space shall be provided per Dwelling</p>

Page	Paragraph	DEIR Item	Comment
		<p>C. Live-Work Dwellings. There shall be two off-street parking spaces on the same lot for each Live-Work Dwelling Unit. At least one of these parking spaces shall be covered. Additionally, at least one-quarter guest parking space per Live-Work Unit.</p> <p>D. Multi-family dwellings.</p> <p>1. Rental units. For Dwelling Units having less than three habitable rooms, there shall be at least one parking space; for three habitable rooms, there shall be at least one and a half parking space; and for more than three habitable rooms, there shall be at least two parking spaces. No additional guest parking shall be required.</p> <p>2. For-sale units (condominiums, cooperatives). For each Dwelling Unit there shall be at least two parking spaces and at least one-quarter guest parking space per Dwelling Unit.</p> <p>3. Required parking spaces for multi-family dwellings may be uncovered. All required parking spaces for multi-family dwellings shall be located within 750 feet of the Dwelling Unit that they are intended to serve.</p>	<p>½ Guest parking space shall be provided per Dwelling</p> <p>½ Guest parking space shall be provided per Dwelling.</p> <p>½ Guest parking space shall be provided per Dwelling.</p> <p>At lease ½ of parking spaces for these units must be covered and within 500 ft of the Dwelling Unit that they are intended to serve.</p>
42 - 43	Section 7.4	<p>COMMERCIAL PARKING REQUIREMENTS Automobile parking regulations for commercial uses shall be as follows:</p> <p>A. Non-Occupiable structures. No parking spaces shall be required.</p> <p>B. Child care facilities. One parking space per classroom or one parking space for every 500 square feet of Floor Area, whichever is greater.</p>	<p>Some Commercial Vehicle Parking shall be provided.</p> <p>This is not enough parking for the Child Care Center – capacity must be increased.</p>

Page	Paragraph	DEIR Item	Comment
42 - 43	Section 7.4	<p>COMMERCIAL PARKING REQUIREMENTS Automobile parking regulations for commercial uses - Continued</p> <p>C. Community Serving Uses.</p> <p>1. Fitness Facility. Four parking spaces for every 1,000 square feet of Floor Area shall be provided.</p> <p>2. Fire Station. Two parking spaces for each fireman on one shift and three visitor parking spaces shall be provided.</p> <p>3. Public Library. Two parking spaces per 1,000 square feet of Floor Area up to a maximum of 20 parking spaces. Up to one-half of these spaces may be shared with the retail parking described in Subsection 7.3.E below if the library is constructed in proximity to a community meeting room. In the event that the library is not located near a community room, the total number of parking spaces for library employees and visitors shall be increase by three additional parking spaces.</p> <p>4. Police Stop Over Station. Two parking spaces shall be provided regardless of Floor Area.</p> <p>5. Other Community Serving Uses with 1,000 square feet of Floor Area or more. One parking space per 1,000 square feet of Floor Area shall be provided.</p> <p>D. Commercial Office (Includes Studio Office). One parking space for every 500 square feet of Floor Area shall be provided.</p> <p>E. Retail. Four parking spaces for each 1,000 square feet of Floor Area shall be provided.</p> <p>F. Restaurant uses. Four parking spaces for each 1,000 square feet of Floor Area shall be provided.</p>	<p>If parking is based on Square Footage, there shall be no cap on the number of required spaces.</p> <p>This is completely inadequate. More spaces are needed.</p> <p>Community uses will need more that 1 space per 1000 Sq Ft. This must be increased.</p> <p>Restaurants will require more than this allotment. Must be increased.</p>

Page	Paragraph	DEIR Item	Comment
42 - 43	Section 7.4	<p>G. Studio Use, other than Ancillary Support Facilities, Studio Support Facilities, sound stage, and warehouse uses. One space for each 500 square feet of Floor Area shall be provided.</p> <p>H. Ancillary Support Facilities and Studio Support Facilities, other than sound stage and warehouse uses. No automobile parking spaces shall be required.</p> <p>I. Sound Stage. One space for each 1,000 square feet of Floor Area shall be provided.</p> <p>J. Warehouse. One space for each 1,000 square feet of Floor Area shall be provided.</p> <p>K. For uses not listed above, parking space requirements shall be as set forth in Section 12.21.A.4 of the Municipal Code</p>	<p>Loading Zones must be provided for delivery and miscellaneous vehicles away from sensitive uses.</p> <p>This is not enough. Parking must accommodate trailers and craft services, as well as deliveries.</p> <p>Requirements must be disclosed.</p>
43	Section 7.5	<p>RECREATIONAL PARKING REQUIREMENTS</p> <p>A. Public Parks. No automobile parking spaces shall be required.</p> <p>B. Uses within Open Space Districts. No automobile parking shall be required for any use located in Open Space District No. 1, Open Space District No. 2, or Open Space District No. 3, unless otherwise specified in this Specific Plan.</p>	<p>Public Parks must have parking nearby.</p> <p>All open space areas shall have parking for cars and bikes, as well as for maintenance vehicles.</p>
44	Section 7.5	<p>Universal City Specific Plan Conceptual Circulation Plan</p> <p>SEE ATTACHMENT 26</p>	<p>Additional Bike Paths should be provided along the LA River connecting the initially planned and still necessary East/West Road to the North South Road, thus giving the bikes a second route to Lankershim without going thru the congested Hotel and Theme Park area.</p>

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45 – 46	Section 7.6	<p>GENERAL PARKING REGULATIONS</p> <p>B. No roof-top parking shall be permitted on any parking structure within 500 feet of any Existing Off-Site Residential Use.</p> <p>C. Co-location of Residential Guest Parking. Residential guest parking spaces may be located with parking spaces for retail, restaurant, or other business provided that the maximum distance between the residential building (lot on which it is located) and the nearest point of the parking facility shall be no greater than 750 feet distant there from; said distance to be measured horizontally along the streets between the two lots, except that where the parking area is located adjacent to an alley, public walk or private easement which is easily usable for pedestrian travel between the parking area and the use it is to serve, the 750-foot distance may be measured along said alley, walk or easement.</p> <p>D. Parking Location.</p> <p>1. All required parking spaces for Dwelling Units shall be located within 750 feet of the Dwelling Unit, which they are intended to serve. All required parking spaces for all other uses may be located anywhere within the Mixed-Use Universal City District.</p> <p>2. Parking requirements for uses located in the Studio Production District shall be permitted to share parking with uses located in the adjacent Universal Studios Specific Plan area, pursuant to Subsection 7.6.E below.</p>	<p>This distance of parking structure to residential unit is not close enough.</p> <p>Residential and retail parking must be exclusive of each other and the distance of 750 feet from parking space to residential unit is too far.</p> <p>All areas must have their own parking facilities. No shared parking should be allowed.</p>

Page	Paragraph	DEIR Item	Comment
		<p>E. Reduced/Shared Parking Plan. The parking requirements listed in Subsections 7.3 through 7.5 of this Section may be modified for reduced or shared parking between two or more uses within this Specific Plan area or the Universal Studios Specific Plan area if the Director determines that a lower total number of parking spaces would provide adequate parking for these uses. A reduced/shared parking plan shall not be required for special events or Temporary Uses, which may utilize shared parking with other uses as needed on a temporary basis. An application for and consideration of a reduced/shared parking plan shall be processed pursuant to the following requirements:</p> <p>1. Contents of Reduced/Shared Parking Plan. The reduced/shared parking plan shall contain the following information:</p> <ul style="list-style-type: none"> a. An analysis of parking demand. This analysis shall be conducted by a registered traffic engineer on an hourly basis, from 6:00 a.m. to 12:00 a.m., on a weekday and a weekend day or by other means acceptable to the Director; b. A description of the portion of the Specific Plan area(s) subject to the reduced/shared parking plan; c. A description of the uses, hours of operation, parking requirements, and allocation of parking spaces which demonstrates that adequate parking for each use will be available, taking into account their hours of operation; d. A description of compliance with applicable landscaping and design specifications; and e. A description of the characteristics of the affected uses and/or special programs which will reduce the need for the required number of parking spaces, which may include the availability of alternative transportation modes. 	<p>The Director cannot make changes in the Residential area and without DOT approval, and community input.</p> <p>No changes can be made in the residential area. All other changes must have the approval of DOT and community input.</p> <p>Residential area excluded.</p>

Page	Paragraph	DEIR Item	Comment
		<p>2. Review. The reduced/shared parking plan application shall be deemed complete within ten days of submittal unless the Director advises the Applicant in writing that the application is considered incomplete and the specific reasons therefore. Within 30 calendar days of receipt of a complete application for a reduced/shared parking plan, the Director shall approve the reduced/shared parking plan application or indicate how the proposed reduced/shared parking plan would not provide adequate parking. This time period may be extended by the mutual consent of the Applicant and Director. If the Director does not act within such 30-day period, the reduced/shared parking plan application shall be deemed approved. The decision of Director shall be final and not appealable.</p> <p>3. Findings. The Director shall grant a Shared Parking Plan request if he/she makes the following findings:</p> <p>a. The peak hours of operations are different or other operational characteristics warrant such a reduction; and</p> <p>b. The joint use or shared parking shall not create a negative impact on parking for the surrounding areas or streets.</p>	<p>With DOT and Community approvals.</p> <p>No passive approval is acceptable. All changes must be signed off by the Director and the Applicant.</p> <p>This calculation must be done with the surrounding areas at capacity.</p>
904	Map	Neighborhood Intrusion	<p>The DEIR lists 5 neighborhoods that will experience Neighborhood Intrusion due to the Project, however, Studio City is not listed as one, even though the map on page 904 shows the intersection of Fruitland & Ventura as included in Intruded Neighborhoods. Also there will be intrusion into the Studio City Island Neighborhood from the traffic on Lankershim.</p>

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54	P#1	Traffic mitigation measures	If significant impacts remain then who pays the cost to correct the 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?
54	2	Traffic mitigation measures responsibility	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 is completed.
59	Mitigation Measure B-1	Implementation requirements	The bus program should include Metro transit beyond the one bus line indicated in the project DEIR. Direct connection to Hollywood, Burbank and the Metro Station in North Hollywood would do far more to reduce traffic.
67	Mitigation Measure B-22	Ventura Freeway eastbound on-ramp & Riverside Drive	All state agency budgets are getting cut. If Cal Trans or the DOT do not have the ability to fund these items, then the applicant shall implement the required mitigation

Page	Paragraph	Item	Comment
2 - 3	LA DOT ASSESSMENT LETTER	<p>Traffic Impact Analysis Paragraph 1 B. Trip Generation</p> <p>The source of the trip generation rates used for the office, retail, residential, and hotel land uses is the Institute of Transportation Engineers (ITE) "Trip Generation Handbook, 7th Edition." However, since the proposed studio-related and theme park uses are unique and are not characterized in the ITE handbook, empirical data from the project site and from other similar studio uses were evaluated. Traffic surveys of the studio-related uses in the existing NBC/Universal campus were used to validate these special use trip generation rates.</p>	<p>The data used to calculate the trip generation for the proposed studio-related and theme park uses cannot be determined utilizing Traffic Surveys from similar studios. There are no similar studios to survey. Additionally, all the traffic data used in the study for the project is dated 2007 and does not reflect the normal daily trips generated based on current use.</p>
3		<p>C. Transit-Oriented Development (TOD)</p> <p>DOT is currently updating the City's policies and procedures on the preparation of traffic impact studies. The new policies will promote the goals of State Assembly Bill 32, support improvements that reduce greenhouse gas emissions by reducing the use of single-occupant vehicle trips, and encourage developers to construct transit and pedestrian-friendly projects with safe and walkable sidewalks to and from the transit stations for project patrons.</p>	<p>Traffic Oriented Development (TOD): How does a project that produces over 36,000 vehicles trips a day promote TOD and conform to AB 32?</p> <p>The Main entrance for autos, and the bike path, as well as for pedestrians, both Universal patrons and Metro Rail patrons all meet at one point. Safety for all of those, especially the pedestrians, is critical. It is not safe to bring everything together at one place. The East West road along the river would elevate this problem by having the bike path exit on Lankershim above the main entrance, as well as on Lakeside Blvd. entrance/exit. Additionally, the safety issue for pedestrians could be lessened by having a pedestrian bridge from the Metro Station to the east side of Lankershim Blvd. at the main entrance to the project.</p>

Page	Paragraph	Item	Comment
3		<p data-bbox="488 233 967 268">D. Travel Demand Simulation Model</p> <p data-bbox="488 306 1081 522">Then, using SCAG socioeconomic forecasts, and the estimated traffic and travel patterns of the 256 related projects in the area (including the proposed Metro Universal project), the model was used to simulate future traffic demands for year 2030.</p>	<p data-bbox="1109 233 1500 774">It is impossible to project which of the 256 proposed projects in the area will move forward, and in fact, if there will be additional projects proposed. Construction phasing is critical to this issue as well. Presently, the Metro Project is unpredictable as to whether it alone will move forward and, if it does, what the project will look like. This estimate is meaningless and a true estimate cannot be determined at this time.</p>
3 - 4		<p data-bbox="488 785 724 821">E. Traffic Impacts</p> <p data-bbox="488 858 1073 1436">DOT has determined that, before accounting for the trip reduction benefits afforded to projects adjacent to Metro Line stations, of the 148 signalized intersections studied, the project would result in significant traffic impacts at 88 intersections before mitigation. The proposed transportation mitigation program (discussed in the next section) is expected to fully or partially mitigate these project impacts. However, the remaining impact at eight intersections would be considered significant and unmitigated after implementation of the proposed mitigation program. The intersections expected to experience unmitigated impacts during one or both of the peak commute hours are:</p> <ol data-bbox="488 1478 1036 1877" style="list-style-type: none"> <li data-bbox="488 1478 1036 1549">1. US-101 Northbound Ramps / Campo de Cahuenga Way (p.m. peak hour) <li data-bbox="488 1587 1036 1659">2. Metro Driveway / Campo de Cahuenga Way (p.m. peak hour) <li data-bbox="488 1696 1036 1768">3. Cahuenga Boulevard / Riverside Drive (both peak hours) <li data-bbox="488 1806 1036 1877">4. Cahuenga Boulevard / Moorpark Street (both peak hours) 	<p data-bbox="1109 785 1479 1108">Significant impacts after funded improvements and mitigation are unacceptable. The Project must be reduced in size and the design of traffic mitigations must be revised so as to not have significant impacts after completion of the Project.</p>

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		<p>E. Traffic Impacts Continued</p> <p>5. Lankershim Boulevard / Cahuenga Boulevard (a.m. peak hour)</p> <p>6. Lankershim Boulevard / Main Street (p.m. peak hour)</p> <p>7. Lankershim Boulevard / Campo de Cahuenga Way / Universal Hollywood Drive (a.m. peak hour)</p> <p>8. Olive Avenue / Warner Brothers Studios Gate 2/Gate 3 (p.m. peak hour)</p> <p>Of these eight intersections, five are expected to operate at a level-of-service (LOS) of D or better after build-out of the project, and three are adjacent to the project site. SEE ATTACHMENT 27</p>	<p>Intersections 1, 2, 5, 6, & 7 are across the street or a block from the Project and will affect the entrance/exit. It will affect the island neighborhood of Studio City permanently, which is unacceptable. The project must be scaled back as to not impact this neighborhood in this way.</p>
4		<p>F. Shared Mitigation</p> <p>Some of the traffic mitigations that were identified in DOT’s assessment letter (dated July 24, 2008) as requirements of the Metro Universal project would improve the overall operations of the intersections beyond what is required to mitigate the Metro Universal project’s impacts. In these cases, the cost of the improvement and the mitigation credit may be shared with the NBC Universal Evolution Plan project. However, if the Metro Universal project is not approved or delayed, then the applicant for this subject project shall implement the mitigation. Similarly, to the extent that the mitigation measures required for the NBC Universal Evolution Plan would improve the overall operations of an intersection, roadway segment or freeway segment beyond what is required to mitigate the project’s impacts, the cost of the mitigation may be shared with the Metro Universal project or other proposed developments.</p>	<p>The Applicant must show financial ability to pay for all mitigation planned. The Metro Project may never get off the ground and there may very well not be any shared expense on any of these mitigations. Even if the Metro Project does begin during the planned construction of the Evolution Plan, construction phasing and the possible changes in either project makes relying on shared mitigation not practical.</p>

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5		<p data-bbox="488 233 946 300">II PROJECT TRANSPORTATION MITIGATION PROGRAM</p> <p data-bbox="488 344 1057 632">A comprehensive mitigation program has been developed for the project that includes the following major elements: trip reduction program, transit system enhancements, freeway improvements, traffic signal system upgrades, intersection upgrades and improvements, and neighborhood traffic management measures.</p> <p data-bbox="488 709 1065 1255">Several physical traffic mitigation improvement options at the impacted intersections were evaluated in an attempt to fully mitigate the impacts; however, in some cases, no feasible mitigations were identified due to the constraints of the existing physical conditions. Also, for other locations, street widening was not an option due to right-of way constraints or it was not considered practical nor desirable to widen the street at the expense of reduced sidewalk widths. In other cases, traffic flow improvements that required the removal of on-street parking along a roadway with a high demand for parking were not recommended.</p>	<p data-bbox="1109 233 1479 449">Project Transportation Mitigation Program: “no feasible mitigation measures were identified,” why is that phrase acceptable under CEQA and AB 32?</p> <p data-bbox="1109 489 1503 1436">The applicant proposes to add one bus to aid transit, which is woefully inadequate. Additionally, they plan on supplying that bus for approximately 1/3 of the construction phases of the project, and paying for that bus for only about 1/3 of the time it is supplied, while expecting the City/State to supplement the fares on the bus for most of the time it is supplied. This is completely unsatisfactory. A new transit study should be completed, since it has been some years since the one used in the proposal, and if implemented, the transit study must be updated during all phases of the construction. Additionally, the project applicant must pay the entire cost of the additional transit needs during the entire construction phase.</p>

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5		<p>II PROJECT TRANSPORTATION MITIGATION PROGRAM - Continued</p>	<p>If no feasible mitigations can be achieved, the Project should be scaled back to work within physical constraints. This Project is located at the “Pinch Point” of the San Fernando Valley and there is little or nothing that can be done to improve freeway and major street issues that currently exist. It is unacceptable to add to this already over capacity traffic situation.</p>
5		<p>A. Transportation Demand Management (TDM) Program Through thoughtful building design and orientation, this project can provide a pedestrian-friendly environment, can promote non-automobile travel and can support the goals of an aggressive trip reduction program.</p>	<p>What specific, “inherent incentives” are being provided for employees, visitors and tenants?</p> <p>When completed pedestrian traffic is exposed to massive vehicle traffic, as well as bicycle traffic, at the main entrance to the site. A pedestrian bridge is needed to get traffic safely across Lankershim, especially to the Metro Station.</p>
6	Paragraph 2	<p>A preliminary TDM program shall be prepared and provided for DOT review prior to the issuance of the first building permit for this project and a final TDM program approved by DOT is required prior to the issuance of the first certificate of occupancy for the project. The TDM program should include, but not be limited to, the following strategies:</p> <p>bicycle and pedestrian-friendly environment</p>	<p>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? TDM approval from the DOT should take place before the project begins. If not, the DOT should approve the DM measures in phases of the Project as needed. Issuing approval prior to the issuance of the first certificate of occupancy for the Project is too late and unacceptable.</p>

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6	Paragraph 2	bicycle and pedestrian-friendly environment	The Project needs to have a bike path along the East/West road (which should not be removed from the project) to allow for additional exits and entrances other than the main entrance. Bike safety would be greatly improved if there was more than one entrance/exit, which as it is now would be the main entrance with all the autos and pedestrians.
9	Paragraph 1	The proposed Shuttle System program is acceptable to DOT; however, the program should be guaranteed for a minimum of 20 years.	The project impact is permanent – the shuttle program must be fully funded by the applicant.
9		<p>C. Freeway Interchange Improvements</p> <p>In accordance with the project’s traffic mitigation plan, the applicant shall enter into a Highway Improvement Agreement with Caltrans that ensures the applicant’s involvement in the design, funding and timely completion of these improvements.</p>	The applicant must be responsible for all costs associated with freeway interchange improvements.
10-11	2. US 101 Freeway/Universal Terrace Parkway (Campo de Cahuenga Way) Interchange	<p>D. Freeway Main Line Improvements</p> <p>According to the traffic study, which includes a freeway impact analysis, the Project is expected to result in significant traffic impacts on the freeway system...</p> <p>To mitigate impacts on the freeway system, Caltrans typically requires a fair-share contribution toward specific mainline improvements. Caltrans staff will lead this effort and will determine the required freeway mitigations or fair-share financial requirements for this Project. It is expected that the applicant will continue to work with Caltrans to explore alternatives, to evaluate the feasibility of each proposal, to prepare design plans and to prepare any necessary environmental documents....</p>	All mitigation measures must be worked out before work on the Project begins. The applicant must be financially responsible with finances in place to cover any CalTrans “Fair Share” if the state cannot contribute or contribute in a timely manner.

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		<p>Consideration of improvements to the US-101 freeway adjacent to the Project site should also include the improvement of the Barham Boulevard bridge over the freeway. This is a chronic bottleneck location and should be included in any regional improvement program for this area.</p>	<p>Improvement of the Barham Bridge is a must. This bridge can not handle the traffic now, let alone increased traffic from the Project, especially from the widening of Barham to accommodate the increased traffic for the residential portion of the Project.</p>
12	<p>F. Project Related Transportation Improvements</p>	<p>2. North – South Road Connections A new system of streets internal to the Project should be constructed to provide linkage to the North-South Road, to meet emergency vehicle access requirements and to ensure proper access and circulation within the project site. The Applicant shall work with DOT during the tract map approval process on the internal street system design.</p>	<p>What happened to an East/West road as originally proposed?</p> <p>The original project plan called for an East/West road that ran along the river. The County highway map (1980) shows such a road is required. The North/South road that is currently on the plan does nothing to alleviate the traffic and circulation issues the East/West road would eliminate. The East/West road is a must and should be built along with the North/South road.</p>
15		<p>1. Barham Blvd and Cahuenga Blvd (IS #47) - widen to install an additional westbound through lane on Cahuenga Boulevard. The westbound approach would provide two through lanes, and one right-turn lane. This mitigation would require right-of-way acquisition from Caltrans; therefore, this impact would remain unmitigated if the applicant is not successful in acquiring the necessary right-of-way. This could potentially be a shared mitigation with the Metro Universal project.</p> <p>3. Barham Blvd and Coyote Canyon Rd (IS #54) – in addition to funding the upgrade of the traffic signal controller, widen to install an additional southbound through lane. This intersection is included in the Barham Blvd. roadway improvement described above.</p>	<p>This mitigation is a huge issue and must be required if the Project moves forward with the residential portion. There is no way this intersection in its current state can handle increased traffic.</p> <p>Items 3-6 are mandatory if the traffic flow is to be controlled on Barham Blvd. and must be included in any final plan and fully funded by the applicant.</p>

Page	Paragraph	Item	Comment
15		<p>4. Barham Blvd and De Witt Dr (IS #52) – widen to install an additional southbound through lane. This intersection is included in the Barham Boulevard roadway improvement described above.</p> <p>5 Barham Blvd and Lake Hollywood Dr (IS #53) – widen to install an additional southbound through lane. This intersection is included in the Barham Boulevard roadway improvement described above.</p> <p>6. Barham Blvd and Lakeside Plaza/Forest Lawn Dr (IS #55) – in addition to funding the upgrade of the traffic signal controller, this intersection will be improved as part of both the Barham Boulevard roadway improvement</p>	<p>Items 3-6 are mandatory if the traffic flow is to be controlled on Barham Blvd. and must be included in any final plan and fully funded by the applicant.</p>
20	Paragraph 2	<p>DOT would like to reduce the use of dual right-turn lanes to minimize potential pedestrian conflicts and is currently considering additional signal configuration and operational improvements at this intersection. In the event that DOT recommends the elimination of the double right-turn movement on the northbound and southbound approaches of Lankershim Boulevard, the restriping and/or widening may not be required and the incremental Project impact would increase at this intersection and the intersection would continue to remain significantly impacted.</p>	<p>A significant impact at this intersection (Lankershim/ Campo de Cahuenga/ Universal Hollywood) is out of the question. This is the main entrance to the Project and if there is any intersection that must not be left with a significant impact, it is this one. Blocked traffic at this intersection would be a nightmare for the Island Neighborhood of Studio City and an extreme safety hazard for the pedestrians and bike traffic.</p>
21-22		<p>H. Neighborhood Traffic Management Program (NTMP)</p> <p>According to the residential street impact analysis included in the traffic study, five neighborhoods were identified for their potential to be impacted by the project’s traffic. A local residential street is considered to be impacted based on an increase in the average daily traffic volumes. The objective of the residential...</p>	<p>Studio City is not identified as an impacted community, which is incorrect. The Studio City neighborhood south of Ventura at Vineland will be impacted due to work on the 101 south bound on ramp and the construction work on a new on ramp at Fruitland.</p>

Page	Paragraph	Item	Comment
21-22		<p>H. Neighborhood Traffic Management Program (NTMP) - Continued</p> <p>These local street impacts are typically mitigated through the implementation of neighborhood traffic calming measures such as installing speed humps.</p> <p>The applicant has offered up to \$500,000 to fund any necessary NTM measures within these five neighborhood boundaries.</p> <p>The applicant has submitted an initial NTMP Implementation Plan to DOT (see Attachment I) that sets key milestones and identifies a proposed process in developing a NTM plan for the five identified neighborhoods consistent with DOT policy.</p> <p>As discussed in the initial plan, the agreement should include a funding guarantee, an outreach process and budget for each of the identified neighborhoods, selection and approval criteria for any evaluated NTM measures, and an implementation phasing plan.</p>	<p>As an impacted neighborhood, speed bumps must be installed on Vineland south of Ventura.</p> <p>The applicant must be responsible for whatever the cost is to mitigate neighborhood intrusion, with no limit or predetermined budget.</p> <p>Studio City is not identified as an impacted community – which is not the case. Studio City is heavily impacted and must be added to the list of impacted neighborhoods.</p> <p>The outreach program should include the Neighborhood Councils that surround the Project.</p>
25	Paragraph 2	<p>V. GENERAL CONDITIONS</p> <p>In accordance with the project’s traffic mitigation phasing plan, all transportation improvements and associated traffic signal work within the City of Los Angeles must be guaranteed through the B-Permit process of the Bureau of Engineering, prior to the issuance of the building permits for such phase and completed prior to the issuance of the certificates of occupancy for such phase.</p>	<p>Project applicant must guarantee that all mitigation will be financed by the applicant without any funds coming from state or local government agencies.</p> <p>Traffic measurements must be conducted during each phase and if the mitigation(s) are found to be insufficient, the applicant will consult with the DOT and conform to any DOT recommendations on a per phase basis. No Certificate of Occupancy should be issued without the completion of the restructured mitigation(s).</p>

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25	Paragraph 3	<p>If a proposed traffic mitigation measure does not receive the required approval, a substitute mitigation measure may be provided subject to the approval of DOT or other governing agency with jurisdiction over the mitigation location, upon demonstration that the substitute measure is equivalent or superior to the original measure in mitigating the project's significant traffic impact. To the extent that a mitigation measure proves to be infeasible and no substitute mitigation is available, then a significant traffic impact would remain.</p>	<p>SEE APPENDIX 1 CITY OF BURBANK RESONSE</p> <p>If a planned mitigation measure is infeasible and a new mitigation measure is developed, how can that new measure be superior to the measure that is infeasible? There must be no significant impacts created by the Project once all the mitigation(s) are in place. If that situation exists, the applicant must scale back the Project so as to not leave the community with a significant impact once all mitigation measures are in place.</p>
27	VI. OTHER COMMENTS	<p>A. Los Angeles River Bike Path</p> <p>In February 2007, the City of Los Angeles announced the start of a comprehensive Los Angeles River revitalization plan that includes the completion of the bike path along the river to connect Downtown Los Angeles with Canoga Park. In addition to revitalizing the river, the goal of this project is to provide a continuous and functional riverfront bike path that extends through the City of Los Angeles and is part of an integrated Countywide bicycle plan. DOT fully supports the Los Angeles River Bike Path project. The close proximity of this Project, the Metro Universal project, and the Metro Red Line station to a bike path along the Los Angeles River Flood Control Channel can provide for an enhanced multi-modal transportation system in this area that provides commuters with more options and alternatives to driving a vehicle.</p>	<p>The applicant is asking to be relieved of the necessity of an original East/West road that the Highway Department has on its 1980 plan to run along the Los Angeles River. The applicant must not be relieved of the necessity of constructing the East/West road as it is invaluable to traffic congestion and circulation by providing an internal entrance and exit other than the main entrance and exit and connect Lankershim Blvd with Lakeside Plaza.</p>

Page	Paragraph	Item	Comment
27	VI. OTHER COMMENTS	<p data-bbox="488 233 1083 268">A. Los Angeles River Bike Path – Continued</p> <p data-bbox="488 306 1083 814">However, the project does not propose providing public access along the Los Angeles River Flood Control Channel (the site’s northern boundary) due to existing constraints and since the Applicant does not own the right-of-way. The County of Los Angeles Flood Control District owns the majority of the right-of-way for River Road along the northern end of the project site. DOT is aware of these right-of way issues and of the constraints that include buildings and electrical substations currently located within the anticipated footprint of any future bike path along the south side of the river channel.</p> <p data-bbox="488 852 1083 1472">While DOT supports the bicycle system features proposed in the project's design, a truly comprehensive multi-modal system would include a riverfront bike path. This project does not propose to construct any new buildings within 20-feet of the edge of the Los Angeles River Flood Control Channel, but the project scope does not include the removal of the existing constraints. To preserve the future right-of-way for any Los Angeles River bike path options, DOT recommends that any future plans for the northern edge of the project site prohibit construction within the anticipated footprint of a future Los Angeles River bike path (currently estimated at 20-feet from the edge of the channel).</p>	<p data-bbox="1109 306 1503 705">If this road were to remain a requirement to the Project, a bike path could be installed to run next to the road and supply an additional entrance and exit to the project and relieve some of the congestion created by the bike path starting at the main entrance along with the all the auto and pedestrian traffic.</p> <p data-bbox="1109 852 1503 1545">The Project should be required to remove existing structures in order to include the construction of the required East/West Road. The entire city of Los Angeles is constructing bike paths along the LA River and there is no reason that the applicant should be exempted from the same. With the scope of work this project requires in as far as demolition of existing structures and infrastructure, it can be altered (redesigned) to conform with the city’s plan to create a bike path along the entire stretch of the LA River.</p>

Page	Paragraph	Item	Comment
27	VI. OTHER COMMENTS	<p>B. BARHAM BOULEVARD BRIDGE As stated above, the applicant should continue to work with Caltrans to develop meaningful freeway enhancements that can serve to alleviate commuter congestion. Improving traffic flow along the freeway mainline can provide for enhanced travel along the City’s street network. However, any improvements to the US-101 freeway adjacent to the project site should also include the replacement (or retrofitting) and expansion of the Barham Boulevard bridge over the freeway.</p>	<p>The Barham bridge is currently congested at all times of the day and night. It is unacceptable that any widening of any part of Barham, building of any additional residence units in the area (particularly the scope of which the Project plans) and any freeway alteration not include replacement of, expansion of or retrofitting the bridge. Traffic will come to an absolute halt. Additionally, the Ventura/Cahuenga Boulevard Corridor Specific Plan does not allow for traffic to be dumped out onto Ventura Blvd. or Cahuenga Blvd., thus this factor must be considered in any plan that involves Barham Blvd. and or the Barham Bridge. Additionally, the Project applicant must be responsible for any mitigation costs without the expectation of State or local funds.</p>
		<p>CONCLUSION - As stated earlier, this report represents DOT’s initial assessment of the project’s traffic impacts. Revisions or amendments to this letter may follow as the project proceeds through the environmental review and certification process, or if there are any revisions to the scope of the project. Under the current proposal, the project is expected to result in eight unmitigated traffic impacts after implementation of the proposed transportation mitigation program. Of these eight intersections, five are expected to operate at a level-of-service (LOS) of D or better after build out of the project, and three are adjacent to the project site.</p>	<p>Eight unmitigated traffic impacts are mentioned; why is that acceptable?</p> <p>The project should not leave any Significant Impacts of any kind after build out and all mitigation measures are in place.</p>

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28		<p>While mitigations are proposed at these locations that partially mitigate the project’s impacts, a significant impact still remains. To further reduce the number of unmitigated traffic impacts, consideration should be given to additional project alternatives that are of a reduced density and would, therefore, generate less traffic and result in less traffic impacts. Revisions or amendments to this letter may follow as the project proceeds through the environmental review and certification process, or if there are any revisions to the scope of the project. Under the current proposal, the project is expected to result in eight unmitigated traffic impacts after implementation of the proposed transportation mitigation program. Of these eight intersections, five are expected to operate at a level-of-service (LOS) of D or better after build out of the project, and three are adjacent to the project site. While mitigations are proposed at these locations that partially mitigate the project’s impacts, a significant impact still remains. To further reduce the number of unmitigated traffic impacts, consideration should be given to additional project alternatives that are of a reduced density and would, therefore, generate less traffic and result in less traffic impacts.</p>	<p>The three significant impacts that are adjacent to the property greatly affect the Island Neighborhood of Studio City and are unacceptable. The Project must be scaled back as to not create any significant impacts. Additionally, as stated earlier, Studio City is not on the Impacted Neighborhood list provided by the applicant. Studio City must be included as an impacted community on this list and the applicant must pay for all necessary neighborhood impacts during the construction phase of the 21 year build out.</p>