



Southern California's Leading Transit Advocacy Group

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Friday, February 04, 2011

City of Los Angeles Department of City Planning
Attn: Jon Foreman, Senior City Planner
200 N. Spring St., Room 601
Los Angeles, CA 90012-3243

Via facsimile to (213) 978-6566 and email to jon.foreman@lacity.org
RE: Case No. ENV-2007-0254-EIR – NBC Universal Evolution Plan

Dear Mr. Foreman:

The Transit Coalition, as a nonprofit advocacy organization based in the San Fernando Valley, is providing its comments regarding the Draft Environmental Impact Report (“DEIR”) for the NBC Universal Evolution Plan (the “Project”), focusing on the following elements:

- Transit usage
- Bicycle facilities
- Pedestrian accessibility
- Parking requirements

Our goal is for a Project that will provide a level of transit, bike, and pedestrian accessibility that will actually induce a significant modal shift from vehicular use under a standard development scenario. While the Applicant indicates that this is one of the Project’s goals, as currently envisioned, the Project would require a number of important modifications to meet the California Environmental Quality Act (“CEQA”) standard for less than significant impacts.

Our approach to these modifications is to present low-cost, cost-neutral, and even cost-saving alternatives for the Applicant to implement that would enhance transit, bicycle, and pedestrian usage. Several of these recommendations differ from mitigation measures that focus solely on the Level of Service (“LOS”) for vehicles. Indeed, if mitigation measures are only focused on improving LOS, that is an inducement to driving over transit, biking, or walking. Hence, in addition to incorporating the LOS modeling results, The Transit Coalition calls upon the City of Los Angeles to require the Applicant make modifications to its proposed mitigation measures, as outlined below, in order to justify the Transportation Demand Management (“TDM”) credits that the Applicant is requesting.

Finally, we propose that the TDM credits be phased-in alongside the phasing of the Project based on actual documentation of vehicle trips generated and modal shifts to transit, biking, and walking. Incentives should be provided to the Applicant in the form of TDM credits, parking requirements, and density levels that would be increased or decreased for subsequent phases to align the Applicant's interests with maximum vehicle trip reduction and modal shifts.

I. Trip Generation / Transportation Demand Management Credits

While The Transit Coalition agrees with the Applicant's goal to achieve a 20 percent TDM reduction on the new housing units proposed for the Project – indeed, we could support an even higher reduction as an incentive – the proposed mitigation measures are insufficient to

achieve this goal. Several factors that have been noted by other parties are that housing that targets upper-income households, requires bus-to-rail transfers, and includes multiple free parking spaces for each housing unit is unlikely to achieve a 20 percent TDM reduction. While free transit passes provide a marginal degree of convenience that may help induce some transit trips, the long distance and grade to the high-capacity, high-frequency transit services at Metro Universal City Station will serve as a deterrent for pedestrian access to that facility; hence, the design of the new transit service in the Project Area becomes crucial.

Also, if the cost of parking is rolled into the residential units, that provides a sunk cost disincentive toward transit use and requires a higher rental or purchase price to break even for the Applicant. In order to be a Transit-Oriented Development ("TOD"), to which the Applicant aspires, the cost of all residential parking should be unbundled from the units. This will make the units more attractive to households with fewer vehicles and greater usage of transit and non-motorized modes. A portion of the parking price, above the Applicant's cost, should be allocated toward the new transit service.

II. Transit Improvements

The Applicant proposes three transit improvements: the purchase and maintenance of an articulated bus for use on Ventura Boulevard; a shuttle system to the Project Area; and subsidized transit passes.

1. Ventura Boulevard

The proposal to purchase and maintain an articulated bus for Ventura Boulevard, while well-intentioned, would be a very inefficient use of resources for mitigation. The Los Angeles County Metropolitan Transportation Authority ("Metro") does not have a shortage of buses; in fact, it is continuing to reduce bus service systemwide. Metro does not operate articulated buses on Ventura Boulevard, nor do ridership projections suggest that would be the optimal way to induce Project tenants, visitors, and residents to use transit instead of driving.

Metro's own blog, *The Source*, has highlighted that the top issue riders noted in its surveys was the need for more frequent service.¹ While increasing frequency during peak hours may cause inefficient bunching on some routes, increasing off-peak frequency improves the perception of transit reliability among choice riders, because even if a bus is late (a reliability issue), the next bus will arrive soon enough that it will not be a problem (a frequency benefit).

Research indicates that the elasticity of demand for off-peak service due to changes in frequency is typically double that of peak service,² indicating that more riders can be attracted through boosting off-peak frequency than by focusing on reducing crowding on peak service.

Headways are now infrequent enough that for a rider it is often faster to board any bus that arrives first, Local or Rapid, rather than to wait for the Rapid. This is a factor in causing ridership on the Rapid lines to fall: according to Professor Robert Cervero, "service frequency strongly influenced BRT patronage in Los Angeles County."³

Hence, rather than specifying the times of day during which additional service should be operated, The Transit Coalition proposes that the Applicant obtain an agreement with Metro to

1 Camino, Fred. (2011). Why You Ride (or Don't) Thursday roundup. *thesource.metro.net*, January 20, 2011.

2 Currie, Graham, Wallis, Ian. (2008). Effective ways to grow urban bus markets - a synthesis of evidence. *Journal of Transport Geography*, Volume 16, Issue 6, pp 419-429.

3 Cervero, R., Murakami, J., & Miller, M. (2010). Direct ridership model of Bus Rapid Transit in Los Angeles County, California. *Transportation Research Record*, Vol. 2145, pp. 1-7.

provide Metro with funds equal to the cost of Mitigation Measure B-1, as estimated by Metro, toward the increase of service levels on Metro Rapid Line 750 for 10 years. In return for receiving these funds, Metro would be required to increase the number of daily trips on Line 750 and stipulate that it shall make no net cuts to total daily trips on Line 750 for the duration of this funding. Thus, Metro can determine the optimal allocation of resources for this bus line as conditions change. This alternative would also reduce administrative requirements on the Applicant over the life of the Project, resulting in a net reduction in cost.

Another crucial factor for transit usage is the trip time relative to driving. Currently, the Ventura Boulevard bus services (Lines 150, 240, and 750), suffer from delays at Plaza Parkway (Intersection #16) and Campo de Cahuenga Way/Riverton Avenue (Intersection #17) due to close proximity of these two intersections and the types of signals they currently have. Buses can get caught behind each signal cycle, adding several unnecessary minutes to the travel time, making transit usage less attractive.

Fortunately, there are two mitigation measures that would address this problem in the near vicinity of the Project Area. First, the left-turn signal from eastbound Ventura Boulevard to eastbound Campo de Cahuenga Way should be converted from a protected to a protected-permissive signal. This would allow buses to continue through to the Metro station without additional delay.

In general, The Transit Coalition requests that the Applicant and the City of Los Angeles Department of Transportation (LADOT) implement all of the Project's proposed left-turn enhancements as protect-permissive signals by default in order to maximize throughput and LOS, unless if safety considerations indicate otherwise.

The other needed mitigation measure would be to move the traffic signal from the intersection of Ventura Boulevard and Plaza Parkway to the shopping plaza's entrance from Vineland Avenue. This one improvement alone would not only significantly benefit transit service, it would immediately eliminate one of the intersections at which LOS cannot be reduced to less-than-significant levels. Vineland Avenue has about half the number of vehicles as Ventura Boulevard at Intersection #14, so significantly more vehicles benefit from having a smoother flow of traffic on Ventura Boulevard.

By providing these mitigation measures, access to the Project site from Ventura Boulevard will become smooth and unimpeded; otherwise, gridlock is foreseeable. This will also be necessary to maintain transit times on Line 750; otherwise, the amount of service Metro will be able to operate for a given level of cost will decrease due to increased travel times generated by additional trips to the Project, particularly Zones A & B, thus adding to the significant transit impacts of this project.

The Applicant needs to address whether its LOS estimates for this intersection are based on overall traffic, averaging delays for all directions and vehicles; they are not consistent with current delays of 1-4 minutes by being caught at multiple signal cycles between Intersections #14, #16, and #17 on approaching the Metro Universal City Station, serving the Project Area. While not every bus is caught at each of these intersections, the cumulative impact of this problem adds up to thousands of hours of lost productivity for passengers and operational costs for Metro.

In addition, by using statistics based on averages per vehicle, rather than by passenger trip, the Applicant's model does not reveal the significant nature of the impact on existing transit riders as well as the likelihood of Project tenants, visitors, and residents to use this transit service. On p.825, Figure 45A indicates that 361 of 2,432 vehicles passing through the intersection during AM peak hours are turning from eastbound Ventura Boulevard to

eastbound Campo de Cahuenga. Using the data on p.755, Table 25, with 37 Line 150/240 passengers/trip x 6 peak hour trips plus 46 Line 750 passengers/trip x 12 peak hour trips, i.e., the Applicant's assumptions, 774 passengers are currently being carried. When added to the 361 vehicles at a "typical auto capacity of 1.20 persons per auto in the Study Area" (p.205), at least 1,186 individuals are currently making a left-turn from eastbound Ventura Boulevard to eastbound Campo de Cahuenga during the AM peak hour. Under the Future With Project Scenario, 962 vehicles would be making this turn, implying at least 1,907 affected people (and that is not taking into account any changes in transit ridership), while 3,769 vehicles would be passing through the intersection in all directions. Hence, LOS measurements averaging out the delay to 18 buses over 3,769 vehicles obscure the impact by person when taking into account transit ridership, which reveals that at least 1,907 individuals would be affected by this problem.

In order for the Applicant to receive the TDM credits associated with the Future With Project With Funded Improvements Scenario, these two mitigation measures must be included.

2. Shuttle System

The Transit Coalition agrees with the City of Burbank's recommendations that the proposed shuttle system be integrated with an existing transit provider, not only for the reasons Burbank identified, but also because it will increase the likelihood of use by potential transit riders who are less familiar with the Project Area through integration with existing system maps and online trip planners. In particular, regardless of who the operator is, it is essential that the services consist of fixed-routes with published timetables. We believe the optimal scenario may be for BurbankBus to operate the new shuttle from Universal City Station through the Project Area to downtown Burbank, with the Applicant establishing an agreement with Metro to increase service on Line 222 on Barham Boulevard.

As with Ventura Boulevard, frequency of service and speed of travel are crucial factors to induce mode shift to transit. Hence, we recommend 10 minute peak and 20 minute off-peak headways. Both the peak-hour lanes on the North-South Road and an additional, reversible lane on Barham Boulevard should be High Occupancy Vehicle (HOV-3) lanes to encourage carpool, vanpool and transit usage. Given the existing and latent demand for travel on Barham Boulevard, even HOV-2 would be insufficient to produce the trip time reductions sufficient to induce modal shift; HOV-3 or bus-only restrictions would keep free-flowing conditions in those lanes. These improvements would reduce travel time, enabling greater frequency for the same cost, which in turn justify greater TDM credits through higher transit usage.

3. Transit Passes

The Transit Coalition would support the provision of free transit passes, such as the current EZ Pass, that would provide free access to both Metro and BurbankBus services. We note, however, that the benefit here is primarily derived from convenience; higher-income individuals tend to have a low level of price elasticity of demand with respect to transit. In other words, even offering transit for free does not necessarily have a major impact on whether higher-income individuals will use it. To the extent the Project develops housing aimed at lower incomes, the trip reductions generated by this mitigation measure will increase. Hence, unbundling the cost of parking from the housing units would need to be part of the Project's mitigation measures in order to justify the proposed TDM credits.

4. Other Transit Impacts and Analysis

On p.619, both the peak-hour lanes on the new North-South Road and the additional lane on Barham Boulevard need to be High Occupancy Vehicle (HOV-3) lanes to encourage carpool, vanpool and transit usage. Given the existing and latent demand for travel on Barham Boulevard, even HOV-2 would be insufficient to produce the trip time reductions sufficient to induce modal shift; HOV-3 or bus-only restrictions would keep the free-flowing conditions in those lanes necessary to operate on-time, high-reliability transit services that would induce modal shift by riders who are not transit-dependent.

On p.669, the Applicant proposes to widen “the northbound off-ramp at Universal Terrace Parkway (Campo de Cahuenga Way) to provide a free-flow right-turn lane from the off-ramp onto eastbound Universal Terrace Parkway (Campo de Cahuenga Way).” This measure will create a conflict with the existing buses on Campo de Cahuenga Way attempting to make a right-hand turn into the Universal City Station Transit Center.

Moreover, this significantly increases the hazard to pedestrians crossing the bridge from the subway to the Caltrans Park and Ride facility, since they will not be visible to drivers when crossing the right-turn lane. The Transit Coalition recommends against this proposed mitigation measure. If this measure is kept, it is absolutely necessary for the safety of buses and pedestrians that the right-turn lane be signalized as a part of Intersection #22 to prevent drivers from killing pedestrians inadvertently as a result of the mitigation measure’s design.

On p.697, the Applicant acknowledges that 30 parking stalls from the Caltrans Park and Ride facility would be lost in order to build the new freeway on-/off-ramps at Fruitland Drive. However, the Applicant is incorrect in stating that “substitute spaces would be available in the Metro Transportation Authority (sic) and County of Los Angeles Park and Ride Facility.”

These parking lots are almost invariably full by 7:45 A.M. on weekdays, so there is no current spare capacity to offset this mitigation measure. If Metro Universal (Related Project #65) does not proceed, this would be an unmitigated impact.

On p.751, Table 24 states incorrect service levels that affect capacity assumptions for the following:

- Lines 150/240: midday headways range from 15-25 minutes, so it is inaccurate to select the minimum headway; the average midday headway for this line pair currently is 20 minutes.
- Line 750: as noted before, the eastbound morning headways to Zones A & B is every 10 minutes; given the commercial nature of these zones, more trips will be coming to rather than departing from them, as evidenced by the Project-Only trip results at Intersection #36, so the correct A.M. headway to use would be 10 minutes. Also, midday headways are now every 30 minutes.

On p.755, Table 25 uses an incorrect capacity for Line 96: this is contracted service by a private operator using a smaller bus; the capacity is lower than 50, with maximum load patronage already exceeding capacity during PM hours at times.

III. Bicycle Facilities

The Transit Coalition supports the request of bicycle advocates and the City of Burbank that the Applicant participate in completion of the Los Angeles River Bicycle Path between Barham Boulevard and Lankershim Boulevard along the Los Angeles River. Given the significant elevation gain on the North-South Road, through bicycle traffic will be better served with a shorter, direct, level path along the river. Implementation of this mitigation measure would be a component of evidence to support the study’s claimed TDM and non-motorized transportation credits.

IV. Pedestrian Accessibility

No single impact of the Project causes greater concern to The Transit Coalition than on pedestrian accessibility at Metro Universal City Station, which is located at Intersection #36. The mitigation measures proposed to address LOS at this intersection would cause irreparable harm to pedestrian accessibility in a number of ways. In order to have a bridge that is compliant with the Americans with Disabilities Act, the structure would have to be of a size that would require a significant amount of time for pedestrians to scale and descend. Moreover, the bridge would only connect the subway entrance with the Project Area; however, the removal of crosswalks would impede riders switching between through buses on Lankershim Boulevard and the transit center. Far from being an amenity, the bridge will be an impediment to pedestrian movement.

While the agreement between Metro and the Applicant stipulating the construction of this facility predates the Project, the Applicant has the ability to renegotiate with Metro the terms of the agreement. We request that the City of Los Angeles require that the Applicant release Metro from the obligation to build this bridge in return for the following:

- Diagonal crosswalks at Intersection #36, together with signage and signal timing modifications that enable pedestrian-only crossing time in return for eliminating pedestrian crossings when vehicles are moving
- 50-50 split between the Applicant and Metro of the cost savings to Metro of foregoing the bridge
- Commitment by Metro to apply 100% of its cost savings to increasing service on Lines 150, 240, and 750
- Receipt by the Applicant of additional TDM credits

By eliminating pedestrian crossings while vehicles are moving, the Applicant can improve LOS at this intersection at a fraction of the cost of the bridge, and share in multi-million dollar cost savings at the same time. As indicated by LADOT at www.ladot.lacity.org/pdf/PDF127.pdf, the cost of the diagonal crosswalk is a mere \$7,000, vs. several million dollars to build a bridge no one needs.

V. Parking

For the reasons described above, in order to justify the TDM credits, all residential parking needs to be unbundled from the cost of housing. Specifically, the condominium/owned parking ratios should be reduced to or below the apartment/rental parking ratios for both residents and guests.

In addition to residential parking, The Transit Coalition has identified excess parking requirements in the retail portion of the development, the elimination of which would not only enhance pedestrian accessibility, but also reduce costs for the Applicant. These include reducing child care center parking ratio: this should be a “kiss and ride”, parking for employees only (and the employees should be provided with incentives to use other modes). The hotel parking requirement should be reduced to 1 space per 3 guest rooms, given the exceptional transit accessibility and co-location with destination, with unbundled parking costs

Likewise, the community shopping center and restaurants should have a higher shared parking reduction than 2% to account for the differences in customer volumes between stores:

- Estimated peak demand in Table 47 is 396, below the 460 spaces required under Specific Plan
- We recommend a 15% reduction per square foot to leave a 5% unutilized contingency capacity
- Given the number of lower-wage jobs in the retail sector, free transit passes should be made available to all employees to encourage transit use and further reduce parking requirements

Conclusion

In summary, The Transit Coalition requests that the Applicant and the City of Los Angeles agree to implement the mitigation alternatives that we have described above in order to justify the TDM credits at a modest overall cost and in some cases even a savings to the Applicant.

Sincerely,



Bart Reed
Executive Director