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Via Email and U.S. Mail

August 13, 2019

Leonard Bechet, Senior Planner
Community Development Dept.
City of Burbank
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150 N. Third Street
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lbechet@burbankca.gov

Patrick Prescott, Director
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Zizette Mullins, City Clerk
Office of the City Clerk
City of Burbank
275 East Olive Avenue
P.O. Box 6459
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zmullins@burbankca.gov

Re: Comment on Recirculated Draft Environmental Impact Report, 777 North Front Street (State Clearinghouse #2018041012)

Dear Mr. Bechet, Mr. Prescott, and Ms. Mullins:

I am writing on behalf of **Supporters Alliance For Environmental Responsibility ("SAFER")** regarding the Recirculated Draft Environmental Impact Report ("RDEIR") prepared for the Project known as 777 North Front Street (State Clearinghouse #2018041012), including all actions related or referring to the proposed clearing and excavation of a project site and construction of three multistory buildings including one 279,162 square-foot, seven-story residential building containing 252 units, one 346,644 square-foot, eight-story residential building containing 321 units, 1,206 parking spaces split between the two residential buildings, and one 212,250 square-foot, seven story hotel building containing 307 hotel rooms and 327 parking spaces located at 777 North Front Street in the City of Burbank, California ("Project").

After reviewing the RDEIR, we conclude that the RDEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's

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impacts. SAFER request that the Community Development Department address these shortcomings in a revised draft environmental impact report (“RDEIR”) and recirculate the RDEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

Sincerely,



Richard T. Drury
Lozeau Drury LLP
Attorneys for SAFER