

UNITE **HERE!** Local 11

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October 31, 2019

Planning Board
City of Burbank
Community Development Department
275 E. Olive Avenue
Burbank, CA 91502
xathomas@burbankca.gov

VIA EMAIL AND HAND DELIVERY

Re: UNITE HERE Local 11 Comments on 777 N. Front Street Project; Specific Plan Amendment; Zone Map Amendment; Development Agreement; Vesting Tentative Tract Map; Purchase and Sale Agreement; Certification of Final Environmental Impact Report

Dear Chair Atteukenian and Honorable Boardmembers,

On behalf of UNITE HERE Local 11 ("Local 11"), we respectfully write to provide the City of Burbank with the following comments regarding the Specific Plan Amendment, Zone Map Amendment, Development Agreement, Vesting Tentative Tract Map, Purchase and Sale Agreement, and Final Environmental Impact Report ("FEIR") prepared for the above-mentioned proposed Project at 777 N. Front Street. We are writing to you to urge you to deny the proposed project at 777 N. Front Street. Burbank is experiencing a massive wave of development, the effects of which should not hurt our environment and should mitigate our regional housing crisis. In short, we believe this project's anticipated impacts on Greenhouse Gas ("GHG") emissions need to be reassessed using more stringent thresholds of significance, and we believe the project should include more units of housing. We encourage the Planning Board to pursue Alternative 3 in the FEIR and replace the proposed hotel use with a community-serving use, such as housing or open space. We also believe the project should include more affordable housing.

We are concerned about the proposed project's potential impacts on GHG emissions. The FEIR analysis of GHG impacts relies partially on Burbank's Greenhouse Gas Reduction Plan ("GGRP"), a plan which has recently been recognized by the City of Burbank as outdated.ⁱ Because of this, as we previously commented, the project fails to demonstrate compliance with long-term statewide GHG reduction goals. Furthermore, the project utilizes other regional plans, such as the California Air Resources Board ("CARB") 2017 Scoping Plan and the Southern California Association of Government ("SCAG") Regional Transportation Plan/Sustainable

Community Strategies (“RTP/SCS”), both of which contain no specific/mandatory requirements for local land use projects and, thus, cannot be relied upon solely to determine project’s impacts on GHG emissions. Instead, the City should use South Coast Air Quality Management District (“SCAQMD”) proposed screening and efficiency thresholds to assess the Project’s GHG emissions, which are akin to the bright-line/efficiency thresholds adopted by other air districts.

Notwithstanding SCAQMD not officially adopting these thresholds, many local jurisdictions use them routinely, such as the City of Los Angeles.ⁱⁱ When utilizing SCAQMD thresholds, the project’s 9,019 MTCO₂e/yr in GHG emissions is 300 % greater than SCAQMD’s screening threshold for mixed-use projects (i.e., 3,000 MTCO₂e/yr), and its efficiency level of 4.3 MTCO₂e/yr per service population is 143% greater than SCAQMD’s efficiency target for 2035 (i.e., 3.0 MTCO₂e/yr/sp). This is substantial evidence that the project will have significant GHG impact and, thus, requiring more mitigation than currently provided.ⁱⁱⁱ This project should not go forward until a proper analysis of GHG emissions is done and further mitigation incorporated into the project, such as mandatory transit subsidies for all residents and tenants, site-dedication neighborhood electrical vehicles, and electric vehicle (EV) shuttles to major destinations in the city.

Burbank needs more housing now, especially affordable housing. According to a March 2019 article, Burbank has to aggressively pursue low-income housing development if it hopes to come close to achieving its low-income Regional Housing Needs Assessment (“RHNA”) goals.^{iv} This project can meaningfully contribute to this goal if it increases its affordable unit mix. The project only proposes 69 units of affordable housing at the moderate-income level, rendering the residential units potentially inaccessible to a single person making less than \$58,450.^v In a City that already has a jobs-to-housing imbalance of 3.5, we *must* prioritize making our city more accessible to low-income individuals and families, especially for projects that maintain such significant proximity to public transportation.

This project needs significant improvements before you recommend approval to City Council. Please consider our concerns seriously. We urge you to continue this item until the developer addresses the outstanding questions around the GHG impacts, commits to Alternative 3, and allocates more residential units for affordable housing. Thank you for your consideration.

Sincerely,

Kate Spear
Research Analyst
UNITE HERE Local 11

ⁱ [City of Burbank \(10/28/19\) Community Development Department Staff Report, https://burbank.granicus.com/ MetaViewer.php?view_id=44&clip_id=8851&meta_id=359321.](https://burbank.granicus.com/ MetaViewer.php?view_id=44&clip_id=8851&meta_id=359321)

ⁱⁱ See e.g., 15116-15216 South Vermont Avenue project (DCP Case No. ENV-2017-1015) Initial Study (“IS”), PDF p. 81 (utilizing 10,000 MTCO₂e/yr threshold), http://clkrep.lacity.org/onlinedocs/2018/18-0279_misc_5_04-042018.pdf; 333 La Cienega Blvd. project (DCP Case No. ENV-2015-897) IS, PDF pp. 89-90 (applying 3,000 MTCO₂e/yr threshold for mixed-use project), <http://planning.lacity.org/eir/nops/333LaCienega/is.pdf>; 3063 W. Pico Blvd. project (DCP Case No. ENV-2016-1604) Mitigated Negative Declaration (“MND”), PDF pp. 86-87 (applying 3,000 MTCO₂e/yr threshold for mixed-use projects), http://cityplanning.lacity.org/staffrpt/mnd/Pub_033017/ENV2016-1604.pdf; 7720 Lankershim Blvd. project (DCP Case No. ENV-2016-2384) MND, p. IV-33 – IV-35 (utilizing 3,000 Tier 3 threshold for non-industrial project), http://clkrep.lacity.org/onlinedocs/2018/18-0827_misc_1_08-28-2018.0001.pdf; 5750 Hollywood Blvd. project (DCP Case No. ENV-2014-4288) DEIR, PDF pp. 31-32 (utilizing 3,000 Tier 3 threshold for non-industrial project), http://planning.lacity.org/eir/5750HollywoodBlvd/DEIR/4.C.Greenhouse_Gas_Emissions.pdf; Bermuda Apartments (DCP Case No. ENV-2017-628) MND, PDF pp. 72-73 (utilizing 3,000 Tier 3 threshold for non-industrial project), <https://planning.lacity.org/odocument/64056bf9-e4b7-4085-b33f-89ced0b9dac5/ENV-2017-628.pdf>; 6516 W. Selma Ave. project (DCP Case No. ENV-2016-4313) MND, PDF pp. 102-104 (utilizing Tier 4 analysis and noting “SCAQMD's draft thresholds have also been utilized for other projects in the City.”), http://clkrep.lacity.org/onlinedocs/2008/08-0887-S1_misc_7_02-22-2017.pdf; Lizard Hotel project (DCP Case No. ENV-2015-2356) Draft EIR, PDF pp. 23-24 (utilizing SCAQMD's Tier 4 analysis), <http://planning.lacity.org/eir/SpringStHotel/DEIR/DEIR%20Sections/Spring%20St%20Hotel%20IV.E%20Greenhouse%20Gas%20Emissions.pdf>; Glassell Park Residential project (DCP Case No. ENV-2016-4394)

MND, PDF pp. 164-165 (applying SCAQMD's Tier 3 and Tier 4 threshold), <https://planning.lacity.org/pdiscaseinfo/Home/GetDocument/MGEwYjZjZjMtNTI3MS00YmYxLTlmMmYtMjk3OTMyNTljYzVm0>; Target at Sunset and Western project (DCP Case No. ENV-2008-1421) Addendum to Certified EIR, PDF pp. 28-31 (applying Tier 3 and Tier 4 thresholds), http://clkrep.lacity.org/onlinedocs/2016/16-0033_misc_1_01-082016.0001.pdf; Reef project (DCP Case No. ENV-2008-1773) DEIR, PDF p. 23-25 (applying Tier 3 and Tier 4 thresholds), <http://planning.lacity.org/eir/theReef/deir/DEIR%20Sections/IV.G.%20Greenhouse%20Gases.pdf>.

ⁱⁱⁱ SWAPE (8/14/19) Comments on the 777 North Front Street Project (Recirculated Draft EIR SCH #2018041012), pp. 8-9.

^{iv} Steven Sharp (3/1/19) L.A. County Cities Falling Short of State-Mandated Housing Goals, <https://urbanize.la/post/la-county-cities-falling-short-state-mandated-housing-goals>.

^v Los Angeles-Long Beach-Glendale, California Housing and Urban Development Fiscal Year 2019 Income Limits Summary, <https://www.huduser.gov/portal/datasets/il/il2019/2019summary.odn>.