

**MTA/Universal Project and Universal RiverWalk Vision Plan
Comparison of Key Concerns and Adverse Impacts**

Concern/Adverse Impact	Metro/Universal Proposal	Universal RiverWalk Vision Plan
<p>The DEIR is inadequate</p>	<p>The cumulative effects of the environmental impacts in the DEIR are understated because they exclude the impacts of the proposed Universal City Vision Plan project which will be the subject of a separate DEIR.</p>	<p>Acknowledges that the proposed MTA/ Universal project is part of a greater Universal City Project but does not address the impacts of the potential 425 residential units. The “land use to be determined upon release of Universal Vision Plan Draft EIR.” It should be noted that the Mayor’s letter addressing the Universal Vision Plan indicates that there will be 2900 residential units off Barham while the RiverWalk map shows only 200 to 600 residential units will be developed.</p>
<p>Traffic, Air Pollution and greenhouse gasses</p>	<p>The DEIR indicated that the proposed development would have significant unavoidable impacts on each of these areas.</p>	<p>Although the RiverWalk increases the footprint of the development it does not reduce the overall effects of the project sufficient to eliminate the significant unavoidable impacts on each of these areas. In fact, it grossly understates the expected size of the Universal Vision Plan Project. No traffic mitigation is offered. There would be no significant reduction in expected traffic counts. The RiverWalk filters traffic to smaller routes which will then be come congested.</p>
<p>Impact on Campo de Cahuenga Historic Site</p>	<p>Page I-5 of the Community Plan states that “Development of the transit station site must retain the early California Spanish Architecture in order to form a historical link with the Campo de Cahuenga, a significant structure from California’s past.” The Campo de Cahuenga is designated as an Historical Landmark by the State of California Office of Historic Preservation, California State Parks.</p> <p>The DEIR indicated that “No feasible mitigation measures are available to reduce impacts associated with increased building height, mass, and density or signage adjacent to the Campo de Cahuenga Historic Site and impacts would be significant and unavoidable at the Campo de Cahuenga.”</p>	<p>The development proposed in the RiverWalk completely ignores this important requirement of the Community Plan. The RiverWalk includes pedestrian walkways that would connect the Campo de Cahuenga to the L.A. River park and trail system. Surface parking would be moved underground, the plaza appropriately landscaped, and space would be available for public events. However, the buildings surrounding the Campo de Cahuenga will still be out of scale with this historic structure.</p> <p>Therefore, no feasible mitigation measures are available to reduce impacts associated with increased building height, mass, and density or signage adjacent to the Campo de Cahuenga Historic Site and impacts would be significant and unavoidable at the Campo de Cahuenga.”</p>
<p>Noise, aesthetic, and lighting impacts on South Weddington Park, City Views/Lofts and Island Neighborhood</p>	<p>The DEIR states that the impacts from height, mass and density as well as signage on South Weddington Park, City View Lofts and the Island neighborhood would be significant and unavoidable after mitigation. These unavoidable impacts are unacceptable and are not in accordance with the Community Plan.</p>	<p>The RiverWalk indicates that South Weddington Park could be connected via pedestrian walkways to the L.A. River Park West. Providing connecting pathways will not mitigate the noise, aesthetic and lighting impacts on South Weddington Park. The height of the proposed buildings would still cast shadows over the park and the location of the transit plaza is the same as in the proposed MTA/Universal project. Therefore, the environmental impacts are not mitigated under the RiverWalk alternative.</p>

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Impacts on Valley views from all hillside homes	<p>The Metro Universal proposal would have adverse impacts on Valley views from all hillside homes south of Ventura Blvd.</p> <p>The Sherman Oaks, Studio City, Toluca Lake, Caheunga Pass Community Plan states requires that existing views in hillside areas must be preserved.</p> <p>The impact on the views of the hillside homes would be significant and unavoidable.</p>	<p>The RiverWalk alternative would not reduce the size of the buildings sufficiently to prevent them from adversely impacting the views of the Valley from the Studio City hillside homes. The RiverWalk proposes placing 4 eight story buildings on the MTA site along with other retail uses. All of those buildings would obstruct hillside views.</p> <p>The RiverWalk alternative violates the Sherman Oaks, Studio City, Toluca Lake, Caheunga Pass Community Plan and the impact on the views of the hillside homes would be significant and unavoidable.</p>
Special Sign District and signage	<p>This area is suburban, not urban. The signage proposed in the DEIR will cause visual blight and use excessive amounts of electricity. The DEIR assumes that the MTA site is a Regional Center and that such signage would be needed to create a media oriented environment. Studio City, Burbank and the surrounding area has existed harmoniously with numerous studios and other media businesses since their inception without any need for such signage.</p> <p>We are not in favor of a Signage Supplemental Use District that would increase visual blight by permitting any electronic billboards. Please note that the proposed METRO Universal SUD does not comply with the Sherman Oaks-Studio City-Toluca Lake-Cahuenga Pass Community Plan (the “Community Plan”) or the LA-RIO.</p>	<p>The RiverWalk incorporates “signage opportunities”. It should be noted that any entitlement permitting a special sign district or digital billboards would have an adverse and unavoidable impact on the surrounding residents. The LA River Improvement Overlay has specific requirements designed to reduce visual blight including restrictions on the type and amount of lighting allowed and requiring screening from public view of all exterior rooftop and ground level equipment and all wireless telecommunication equipment, satellite dishes and exterior antennas. Signage is limited to address identification, business and operational identification and the name of the building, (page 14 of the LA RIO)</p>
	<p>No mitigation measures are available to address the significant impacts of upper level signage within the proposed Project.</p>	

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Water Quality and Hydrology	The DEIR states that the proposed Project would not result in a permanent, adverse change in the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. The proposed Project includes the construction of dense building over areas that are currently open space. Those areas will no longer be able to absorb rain water and contribute the replenishing of the aquifer. This will result in a permanent adverse impact.	The RiverWalk plan includes the construction of hundreds of square feet of buildings including: (i) a media building, (ii) RiverWalk office district, (iii) a mixed use residential/retail development with 4 eight story apartment buildings adjacent to the MTA subway, (iv) an office building, parking garage and bus transit plaza, (v) restaurants and cafes at the Campo de Cahuenga site, (vi) 200 units at a New Road across from RiverWalk Plaza and Park and (vii) potentially 400 residential units and/or production space along the New Road. Therefore because this proposal results in an increase in the size of the footprint of the proposed development it will result in the construction of dense buildings over areas that are currently open space.
Reduction of open space	The MTA/Universal project will result in a significant reduction in open space.	The preponderance of the proposed open space/green areas in the RiverWalk plan are currently open space. The RiverWalk proposes improvements to the functionality of areas that are currently open space. However, it does not propose a source of funding for their construction and maintenance.
Dewatering/storm drain system impacts	The DEIR concludes that the City's storm drain system can accommodate the discharge associated with the dewatering that would occur during proposed Project construction. In a time of severe drought no water resource should be wasted. The developer of the proposed Project should be required to recycle all discharge associated with dewatering such that no net decrease in the aquifer occurs.	Construction of a development of the scope and density of the RiverWalk would result in dewatering issues similar to those described in the DEIR
Strain on City services, including fire, police, library, parks and recreation, and utilities	The LA Fire Department review indicated that implementation of the proposed Project could result in the need for the expansion of Stations 86 and 76 and concludes that the proposed Project would have a potentially significant impact with respect to fire prevention services. The proposed Project may result in a reduction to the current officer-to-population ratio that would be classified as a significant impact. The DEIR indicates that the DWP has stated that with implementation of mitigation the agency has adequate water supplies to serve the proposed Project and projected growth. The specific mitigation measures were not described.	Construction of a development of the scope and density of the RiverWalk would result in issues similar to those described in the DEIR. The RiverWalk document does not address the impacts on fire, police, library or utility services. Public open space areas are part of the RiverWalk project but there is no funding source identified and construction of roads and parks requires significant financial resources. The RiverWalk document does not address the availability of adequate water supplies.

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Evaluation of a reasonable range of alternatives	Based on a review and analysis of each of the proposed alternatives (with the exception of the “no Project” alternative) we do not agree that any of the other proposed alternatives would meet the Project goal of “providing a new development that is consistent with and complementary to the key defining characteristics of the area in which the Project Site is located.”	A significant portion of the RiverWalk deals with development on the area to the East of Lankershim located in Universal City. The DEIR related to Universal City Vision Plan has not been released yet. As a result, it is premature to comment on issues relating to the Universal City development. Therefore, we cannot assess whether or not the development for the East of Lankershim in the RiverWalk proposal would reduce any of the adverse impacts from the Universal City Vision Plan development.
Environmental impacts	The significant impacts on the environment of Alternatives 2 through 8 cannot be reduced to a level of insignificance. The significant impacts cannot be appropriately mitigated. 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.	Construction of a development of the scope and density of the RiverWalk would result in significant impacts similar to those described in the DEIR that cannot be appropriately mitigated.
Transit Oriented District	The Community plan restricts the uses on the MTA/Universal site. The Q conditions on the proposed project site provide that no permits shall be issued until a Transit Oriented District (“TDO”) Plan is approved. The TDO Plan shall address height, intensity, design and other pertinent elements unique to the site. A conditional use permit is required for a Transit Oriented District (TOD). The City has not established a CUP process for TOD’s. The fact that a process has not been established does not mean that this [Q] condition should be removed. We object to the removal of this [Q] condition.	The RiverWalk indicates that locating 425 residential units on the metro Universal site is consistent with Transit Oriented Development principles. A Transit Oriented District Plan for this site has not been adopted. The TDO Plan would address height, intensity, design and other pertinent elements unique to the site. Until the stakeholders have adopted a TDO Plan for this area no building permits shall be issued.