

APPENDIX H

Transportation Analysis Memo

Memorandum

Date: September 28, 2020
To: Kristen Bogue, Michael Baker International, INC
From: Ribeka Toda and John Muggridge, Fehr & Peers
Subject: **Transportation Analysis – 3700 Riverside Drive Project**

LA20-3206

This technical memorandum documents the transportation analysis for the 3700 Riverside Drive project (Project). The Project is located at 3700 Riverside Drive in the City of Burbank, at the northwest corner of the intersection of Hollywood Way & Riverside Drive. This transportation analysis addresses project trip generation, vehicle miles traveled, compliance with plans, programs, ordinances, and policies, and a site plan review.

Project Description

The Project site is approximately 0.61-acre and is located in the southern portion of the City at 3700 Riverside Drive. The Project is at the southwest corner of the Hollywood Way and Riverside Drive intersection, bounded by Riverside Drive on the north, Hollywood Way on the east, an alley to the south, and Screenland Drive to the west. The site is currently occupied by the Lakeside Carwash.

The Project involves the demolition of the existing Lakeside Carwash and the construction of a seven-story, 82,723 gross square foot mixed-use development. The Project would consist of 49 condominium units, 2,000 square feet of ground level restaurant/retail use, a pocket park, and surface and subterranean parking. A site plan of the Project is shown in Figure 1.

Trip Generation

As discussed in the Project Description, the Project consists of the construction of 49 condominium units and 2,000 square feet of ground level restaurant/retail use.

Trip generation rates from *Trip Generation, 10th Edition* (Institute of Transportation Engineers [ITE], 2017) were used to estimate the number of trips associated with the Project. The ITE 10th Edition introduces and defines the geographic setting for four different settings/locations: Rural, General Urban/Suburban, Dense Multi-Use Urban, and City Core. In many instances, trip generation rates



are provided for each land use by geographic setting. The Project is located in an area that meets the General Urban/Suburban ITE definitions; therefore, the trip generation rates for General/Suburban were used.

The total number of peak hour trips generated by the Project considers the portion of trips to and from the site using transit, bicycling, and walking based on the site's proximity to transit and a variety of trip origins and destinations. The total number of Project trips also reflects the expected internal capture of the proposed Project, which includes a mixture of residential and restaurant/retail land uses. Internal capture refers to trips generated by mixed use developments where trips to or from two land uses in the proposed Project are made by just one vehicle trip entering or leaving the Project site. For example, such trips may include those made by residents patronizing the on-site retail before or after their commute to work. Internal capture results in a lower number of total vehicles entering and leaving the Project site, which in turn reduces the total number of vehicles on the roadway network.

In addition, the Project's trip generation estimate includes trip credits associated with the existing carwash that will be replaced by the proposed Project. Trip generation rates for the car wash were not based on a sufficient number of studies in ITE Trip Generation Manual, so instead trip generation rates from *(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region* (San Diego Association of Governments [SANDAG], 2002) were used to estimate the number of trips associated with the existing carwash facility.

Following the application of the trip generation credits described above, the Project is projected to generate an estimated net increase of 1 trip (-2 inbound/3 outbound) during the AM peak hour and a decrease of 22 trips (-9 inbound/-13 outbound) during the PM peak hour. Table 1 shows the trip generation for the Project.

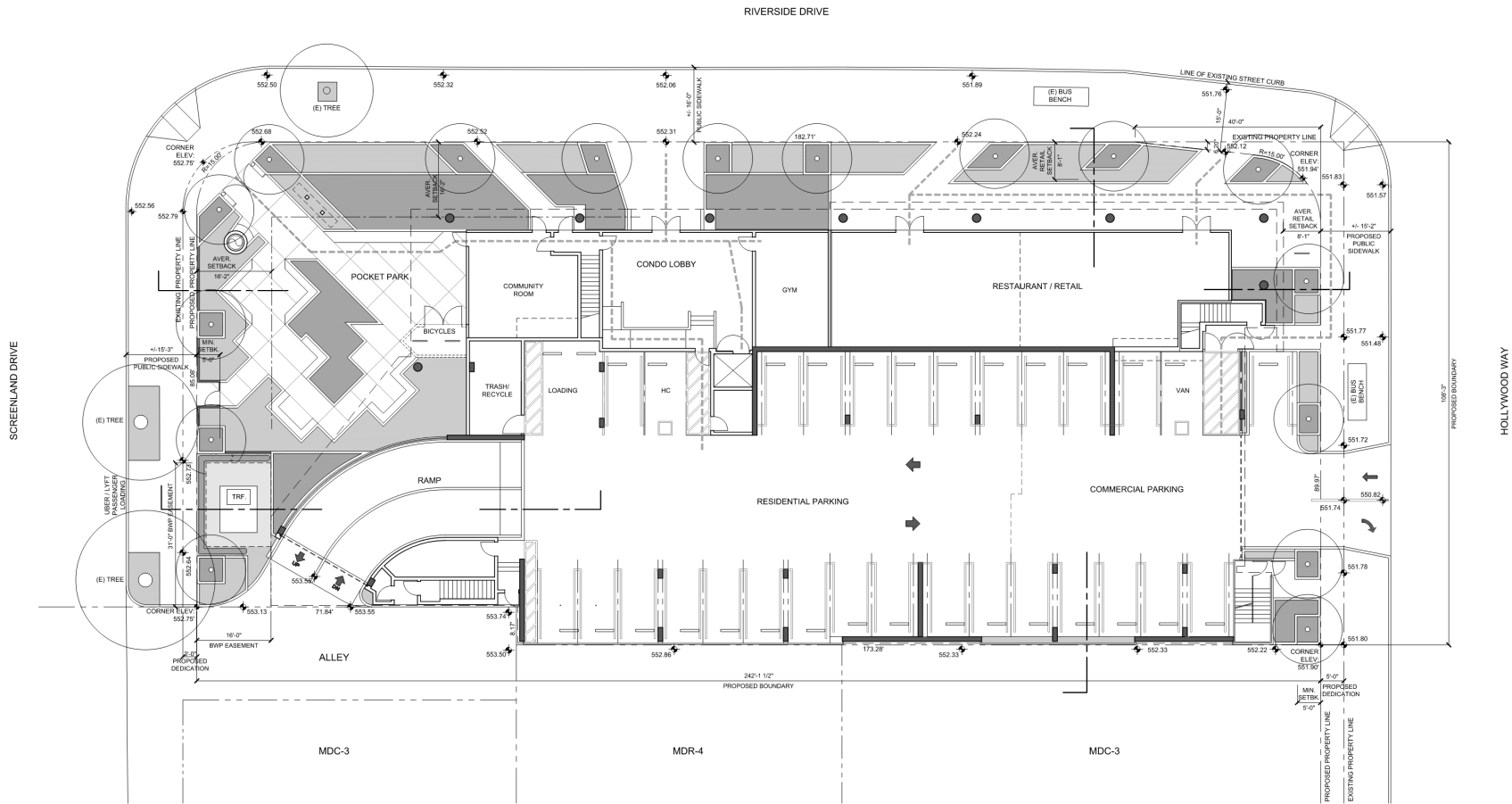


Figure 1

Site Plan

Table 1: Project Trip Generation Estimate

Land Use	ITE Land Use Code	Size	Trip Generation Rates [a]							Estimated Trip Generation						
			Daily Rate	AM Peak Hour			PM Peak Hour			Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
				Rate	% In	% Out	Rate	% In	% Out		In	Out	Total	In	Out	Total
PROPOSED PROJECT																
Mid-Rise Residential	221	49 DU	[b]	[b]	26%	74%	[b]	61%	39%	266	4	13	17	13	9	22
Less: Internal Capture [c]			10%		10%	10%		10%	10%	(27)	0	(1)	(1)	(1)	(1)	(2)
Less: Transit/Walk/Bike Credit [d]			5%		5%	5%		5%	5%	(13)	0	(1)	(1)	(1)	0	(1)
Net External Vehicle Trips										226	4	11	15	11	8	19
High-Turnover (Sit-down) Restaurant	932	1,000 ksf	112.18	9.94	55%	45%	9.77	62%	38%	112	6	4	10	6	4	10
Less: Internal Capture [c]			10%		10%	10%		10%	10%	(11)	(1)	0	(1)	(1)	0	(1)
Less: Transit/Walk/Bike Credit [d]			5%		5%	5%		5%	5%	(6)	0	0	0	0	0	0
Net External Vehicle Trips										95	5	4	9	5	4	9
Retail	820	1,000 ksf	38	0.94	62%	38%	3.81	48%	52%	38	1	0	1	2	2	4
Less: Internal Capture [c]			10%		10%	10%		10%	10%	(4)	0	0	0	0	0	0
Less: Transit/Walk/Bike Credit [d]			5%		5%	5%		5%	5%	(2)	0	0	0	0	0	0
Net External Vehicle Trips										32	1	0	1	2	2	4
TOTAL PROJECT TRIPS										353	10	15	25	18	14	32
EXISTING USE CREDIT																
Carwash		0.6 acre	600	0.04	50%	50%	0.09	50%	50%	(360)	(12)	(12)	(24)	(27)	(27)	(54)
TOTAL EXISTING TRIPS										(360)	(12)	(12)	(24)	(27)	(27)	(54)
NET TRIPS										(7)	(2)	3	1	(9)	(13)	(22)

[a] Source For Mid-Rise Residential, Shopping Center, and High-Turnover Restaurant (Sit-down): Institute of Transportation Engineers (ITE), Trip Generation, 10th Edition, 2017.

Source for Carwash: San Diego Association of Governments (SANDAG), Not-So Brief Guide of Vehicular Traffic Generation Rates for San Diego Region, 2002.

[b] ITE Multifamily Housing (Mid-Rise, trip generation equations used rather than linear trip generation rate

Daily: $T = 5.45(X) - 1.75$, where T = trips, X = dwelling unit;

AM Peak Hour: $\ln(T) = 0.98 \ln(X) - 0.98$, where T = trips, X = dwelling unit;

PM Peak Hour: $\ln(T) = 0.96 \ln(X) - 0.63$, where T = trips, X = dwelling unit

[c] Internal capture represents the percentage of trips between land uses that occur within the site. Given the relatively small size of the retail and restaurant land uses, the internal capture was estimated to be 10% since the uses will mostly be local-serving.

[d] A credit was developed to account for transit, biking, and walking access to the project site based on the site's location and nearby transit service



Vehicle Miles Traveled

This VMT analysis is part of the environmental report being prepared for the proposed Project and follows the California Environmental Quality Act (CEQA) guidance for determining transportation impacts in accordance with Senate Bill (SB) 743.

On September 27, 2013, Governor Jerry Brown signed SB 743 into law, which initiated a process to change transportation impact analyses completed in support of CEQA documentation. SB 743 eliminates level of service (LOS) as a basis for determining significant transportation impacts under CEQA and provides a new performance metric, vehicle miles traveled (VMT). As a result, the State is shifting from measuring a project's impact to drivers (LOS) to measuring the impact of driving (VMT) as it relates to achieving State goals of reducing greenhouse gas (GHG) emissions, encouraging infill development, and improving public health through active transportation. To help lead agencies with SB 743 implementation, the Governor's Office of Planning and Research (OPR) produced a Technical Advisory. This VMT analysis follows OPR guidance and is a component of the transportation analyses conducted for the Project.

The Project has been evaluated under two of the OPR VMT analysis screening options to determine if it may have a VMT impact and require further evaluation. The analysis concludes by assessing if the Project may have an impact under cumulative conditions.

VMT Screening

The first step of a VMT analysis is to determine what type of analysis, if any, is needed. OPR's *Technical Advisory* suggests various screening criteria that agencies may use to quickly identify if a proposed project is expected to cause a less-than-significant impact without conducting a detailed study. Examples of these include project size, project location in a low VMT area, and project accessibility to transit¹. These screening criteria are relevant for the City of Burbank to determine whether a VMT analysis would be applicable for the proposed Project. The screening criteria, used by for the Project, are detailed below and applied to each land use component to determine if the project has the potential to result in a VMT impact. Once a Project component qualifies under one of the screening criteria, that component is screened out from further consideration.

Screening Criteria 1: Project Size

Land use projects that generate less than 110 daily trips and local-serving retail projects, defined as commercial projects with local-serving retail uses less than 50 thousand square feet (ksf) (i.e. not larger regional-serving uses, such as Costco and Walmart), are presumed to have less than

¹ Governor's Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA*, 2018, 12-14.



significant VMT impacts absent substantial evidence to the contrary. Therefore, these projects are screened out from completing a VMT analysis based on project size.

The Project's residential component (49 residential units) is expected to generate more than 110 daily trips and therefore is not screened out from VMT analysis under this screening criteria. The Project's commercial component (2,100 ksf of restaurant and retail space) is less than 50 ksf and consists of local-serving uses, which means the commercial component of the Project is presumed to have a less than significant VMT impact and can be screened out from further VMT analysis.

Screening Criteria 2: Transit Priority Areas (TPA) Screening

Projects located in a Transit Priority Area (TPA) or along a High-Quality Transit Corridor (HQTC) may also be screened out from conducting a VMT analysis because they are presumed to have a less than significant impact absent substantial evidence to the contrary. TPAs are defined in the OPR Technical Advisory as a ½ mile radius around an existing or planned major transit stop or an existing stop along a HQTC. A HQTC is defined as a corridor with fixed route bus service frequency of 15 minutes (or less) during peak commute hours.

The presumption that a project in a TPA will have a less than significant impact absent substantial evidence to the contrary may not be appropriate if the project:

1. Has a Floor Area Ratio (FAR) of less than 0.75;
2. Includes more parking for use by residents, customers, or employees of the project than required by the jurisdiction (if the jurisdiction requires the project to supply parking);
3. Is inconsistent with the applicable Sustainable Communities Strategy (as determined by the lead agency, with input from the Metropolitan Planning Organization); or
4. Replaces affordable residential units with a smaller number of moderate- or high-income residential units.

Based on transit service in Burbank in early 2020, the area where the project is located is on a HQTC. Bus service with 15-minute headways in the peak hours was provided in early 2020 by the following bus routes:

- Burbank Bus Noho – Media District: Stops located at Alameda Avenue/Hollywood Way and Olive Avenue/Hollywood Way with 12-minute headways in the morning and evening peak hours.
- Burbank Bus Pink Route: Stops located at Olive Avenue/Hollywood Way with 15-minute headways in the morning and evening peak hours.
- Metro Line 501: Stops located at Olive Avenue/Hollywood Way with 12-minute headways in the morning and evening peak hours.



At the time of this memo, headways were increased on most lines due to COVID-19 conditions. The Burbank Bus Pink Route continues to operate with 15-minute headways in the peak hours. It is anticipated that the headways for all bus routes will return to pre-COVID-19 conditions in the future.

Based on the Project being located on an HQTC it is screened out from further VMT analysis under this screening criteria.

VMT Analysis for Cumulative Conditions

For cumulative conditions, OPR guidelines state that a project that is below the VMT impact thresholds and does not have a VMT impact under baseline conditions would also not have a cumulative impact as long as it is aligned with long-term State environmental goals, such as reducing GHG emissions, and relevant plans, such as the SCAG RTP/SCS². For baseline conditions, the Project is screened out from further VMT analysis based on the size of the commercial component and its location on a HQTC for the residential component. The Project supports long-term environmental goals with its mix of land uses that helps minimize the number and length of vehicle trips as residents, employees, and visitors can reach multiple destinations in one trip or walk/bike for shorter trips.

VMT Summary

The following summarizes the results of the VMT analysis:

The Project meets the following two screening criteria provided in the OPR Technical Advisory, which the City of Burbank has determined are appropriate to apply to the Project:

- Screening Criteria 1, Project Size, states that local-serving retail uses do not require further VMT analysis. The Project's commercial component is less than 50 ksf and consists of local-serving uses, which means the commercial component is screened out from further VMT analysis.
- Screening Criteria 2, TPA/HQTC Screening, states that residential projects located in a Transit Priority Area (TPA) or along a High-Quality Transit Corridor (HQTC) may also be screened out from conducting a VMT analysis because they are presumed to have a less than significant impact. The Project is located along a HQTC, which means the residential component is screened out from further VMT analysis.

Based on the screening criteria, the Project is presumed to have a less than significant VMT impact and is screened out from further VMT analysis. The screening criteria applied in this study are based on the OPR Technical Advisory on Evaluating Transportation Impacts in CEQA.

² Governor's Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA, 2018, 6.



Plans, Ordinances, and Policies Review

The purpose of this section is to determine whether the Project conflicts with a transportation-related City plan, ordinance, or policy that was adopted to protect the environment. A project would not be shown to result in an impact merely based on whether a project would not implement an adopted plan, ordinance or policy. Rather, it is the intention of this threshold test to ensure that proposed development does not conflict with nor preclude the City from implementing adopted plans, ordinances or policies. This evaluation was conducted by reviewing City documents such as the Burbank 2035 General Plan, the Media District Specific Plan, the Citywide Complete Our Streets Plan, and municipal code sections.

Transit System Project Impacts

This section discusses impacts related to the transit system. This section evaluates whether impacts could include disruptions to existing transit service, interference with planned transit facilities, conflict with adopted transit system plans, guidelines, policies, or standards, or create demand for public transit above the available capacity.

Disruptions to Existing Transit Service

Significance Criteria

A significant impact would occur if a project or project-related mitigation disrupts existing transit services or facilities. This includes disruptions on transit streets caused by proposed project driveways, impacts to transit stops/shelters, and impacts to transit operations from traffic improvements proposed or resulting from a project.

Project Impact

Bus stops, ADA-accessible sidewalks and curb ramps that provide access to bus stops, exist along portions of Hollywood Way and Riverside Drive. The Project is not anticipated to impact transit circulation on the above streets. Therefore, the impact is less than significant.

Interference with Planned Transit Services

Significance Criteria

A significant impact occurs if a project interferes with planned transit services or facilities.

Project Impact

Based on a review of available documents, including BurbankBus's website and Metro's Draft Long Range Transportation Plan (2020), there is a proposed BRT line connecting North Hollywood to Pasadena along SR-134. The Complete Our Streets Plan and the Burbank 2035 General Plan include goals to create a new transit center in the Media District, though an exact location is not specified.



Based on this information, there are no planned transit services that would be impacted by the development of the Project site. Therefore, the impact is less than significant.

Inconsistencies with Adopted Transit System Plans, Guidelines, Policies, or Standards

Significance Criteria

A significant impact occurs if a project conflicts or creates inconsistencies with adopted transit system plans, guidelines, policies, or standards.

Project Impact

The *Burbank2035 General Plan Mobility Element* includes policies supporting the development of alternative transportation programs. Key goals and objectives described by the Mobility Element are to:

- Policy 2.1: Improve Burbank's alternative transportation access to local and regional destinations through land use decisions that support multimodal transportation.
- Policy 4.1: Ensure that local transit service is reliable, safe, and provides high-quality service to major employment centers, shopping districts, regional transit centers, and residential areas

The Complete Our Streets Plan also includes goals to promote transit use by people of all ages, abilities, and disabilities, and improve the experience for transit riders.

In addition, increased transit usage is a key goal of regional transportation plans and policies:

- The *SCAG Regional Transportation Plan* (2016) includes specific goals of sustainable mobility. As noted in the comment letter from SCAG, this includes plans to reduce energy consumption and promote transit-friendly development.
- The *SCAG Regional Comprehensive Plan* (2008) includes an adopted policy supporting local jurisdiction programs that encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bicycle.

The proposed project will not result in any significant impacts to increased transit usage. Therefore, the impact is less than significant.

Bicycle Network Project Impacts

This section reviews project-related impacts on the bicycle network in the study area. Potential impacts include disruptions to existing facilities, interference with planned facilities, and conflicts with adopted plans, guidelines, policies, or standards relating to bicycles.



Disruptions to Existing Facilities

Significance Criteria

A significant impact occurs if a project disrupts existing bicycle facilities.

Project Impact

There are no existing bicycle facilities within the study area, and the nearest bicycle facilities to the Project Site are the on-street bicycle lanes on N Pass Avenue. No Project features or physical mitigation measures have been proposed on Pass Avenue. Therefore, no existing bicycle facilities would be impacted by the development of the Project Site. The impact is less than significant.

Interference with Planned Bicycle Facilities

Significance Criteria

A significant impact occurs if a project interferes with planned bicycle facilities. This includes failure to dedicate rights-of-way for planned on- and off-street bicycle facilities included in an adopted Bicycle Specific Plan or to contribute towards construction of planned bicycle facilities along the project frontage.

Project Impact

Bicycle facilities planned within the study area include on street bike lanes along Riverside Drive, which is prioritized in the Burbank Complete Our Streets Plan as a street that closes gaps and barriers to bicycle ridership between California and the western city border.

The Project would not interfere with the planned facilities. Thus, the Project impact is not significant.

Conflicts with Adopted Bicycle Plans, Guidelines, Policies, or Standards

Significance Criteria

A significant impact occurs if the project conflicts or creates inconsistencies with adopted bicycle system, plans, guidelines, policies, or standards.

Project Impact

In June 2020, the City of Burbank adopted a Compete Our Streets Plan. This plan, which replaced the previously adopted Bicycle Master Plan, recognized the importance of alternative transportation modes, including the bicycle, as a viable means of transportation and provides prioritized recommendations for facilities and programs. The Project is providing on-site bicycle parking. The Project does not conflict with adopted pedestrian system plans, guidelines, policies, or standards. The Project impact is less than significant.



Pedestrian Network Project Impacts

This section reviews project-related impacts on the pedestrian network in the study area. Potential impacts include disruptions on existing facilities, interference with planned facilities, and conflicts with adopted plans, guidelines, policies, or standards relating to pedestrians.

Disruptions to Existing Facilities

Significance Criteria

A significant impact occurs if a project disrupts existing pedestrian facilities. This can include adding new vehicular, pedestrian, or bicycle traffic at locations experiencing pedestrian safety concerns including: reduction in the number of pedestrian-acceptable gaps at unsignalized crossings or queues spilling back through pedestrian crossings.

Project Impact

Pedestrian walkways exist within the study area along Hollywood Way, Riverside Drive, and Screenland Drive. The pedestrian network will be maintained along these ways, and sidewalks will be widened to the widths described in the Burbank2035 General Plan Mobility Element. The Project would remove three existing driveways on Riverside Drive, thus reducing the potential for conflicts with pedestrians on the sidewalk. The Project would improve the pedestrian facilities compared to existing conditions. The Project does not disrupt existing pedestrian facilities, and therefore the impact is less than significant.

Interference with Planned Pedestrian Facilities

Significance Criteria

A significant impact occurs if a project interferes with planned pedestrian facilities. In existing or planned urbanized areas, main streets, or pedestrian districts, this can include impacts to the quality of the walking environment.

Project Impact

The Complete Our Streets plan lists the streets along the project frontage – Riverside Drive, Hollywood Way, and Screenland Drive – as pedestrian priority streets. These streets would be prioritized for citywide pedestrian improvements, including crossing improvements and sidewalk improvements. The proposed sidewalk widths along the frontage are least 15 feet, which would accommodate the guidelines for sidewalk/parkway zones in the plan, should the city make these improvements in the future. No planned pedestrian facilities would be affected by the Project. The Project impact is less than significant.



Conflicts with Adopted Pedestrian Plans, Guidelines, Policies, or Standards

Significance Criteria

A significant impact occurs if a project conflicts or creates inconsistencies with adopted pedestrian system plans, guidelines, policies, or standards.

Project Impact

The Complete Our Streets Plan outlines policy goals for future pedestrian improvements. The plan sets goals to encourage walkability and improve pedestrian safety. The Project does not conflict with adopted pedestrian system plans, guidelines, policies, or standards. The Project impact is less than significant.

Site Plan Review

This section documents the review of the Project site plan and addresses on-site parking, vehicle access, and pedestrian and bicycle access to the Project Site.

Vehicle and Bicycle Parking

The City of Burbank's municipal parking code and the California Government Code contain a series of provisions affecting the required parking supply for the Project. The applicable code requirements are as follows:

- BMC Section 10-1-628 establishes the required parking spaces for residential uses as 1.75 spaces for a studio or one-bedroom unit, and two spaces for a two- to three- bedroom unit.
- California Government Code 65915(p)(1) states that upon the request of the developer, a city shall not require a vehicular parking ratio that exceeds one parking space for a zero to one-bedroom unit, two parking spaces for a two- to three-bedroom unit, and two parking spaces for a four- and more bedroom unit, if the project is granted a density bonus.
- BMC Section 10-1-2107 establishes the required parking spaces for commercial uses in the Media District Overlay Zone. For restaurant land uses, the BMC requires 10 spaces per 1,000 square feet, and for retail land uses, the BMC requires 3.3 spaces per 1,000 square feet.
- BMC Section 10-1-2107(D)(2) states that the City may approve a reduction in the minimum parking requirements for restaurants which can prove that the restaurant would primarily serve a walk-in trade due to the nature of the proposed restaurant and its proximity to large concentrations of employment. The applicant is requesting a reduced minimum parking requirement of 5 spaces per 1,000 square feet for restaurant and retail land uses.
- BMC Section 10-1-628 establishes the minimum requirements for bicycle parking spaces as 5% of the total number of required off-street vehicle parking spaces for residential uses.



Table 2 summarizes the parking requirements based on the Burbank Municipal Code and the California Government Code. As shown in Table 2, the code requirement for the proposed Project is 90 vehicle spaces, which accounts for the Project proposing a conditional use permit to allow a lower parking requirement for retail/restaurant uses and a density bonus to allow a lower parking requirement for the one-bedroom units. According to the Project description, there will be 90 vehicle spaces provided on-site. This would be sufficient to meet the requirements per the Municipal Code and the Government Code, if the CUP and density bonus are granted.

Per the BMC, the Project would be required to provide 4 bicycle parking spaces, which represents 5% of the total number of required off-street vehicle parking spaces for residential uses (80 spaces). The Project is currently only proposing to provide 3 short-term bicycle parking spaces and would need to provide at least one additional bicycle rack to comply with the bicycle parking requirement.

Table 2: Vehicle Parking Spaces Required by City Code

Land Use	Project Size	Code Requirement [a]	Required Vehicle Spaces
Ground Level Commercial			
Restaurant/Retail	2,000 ksf	5 spaces per 1,000 square feet [b]	10
		Total - Commercial	10
Residential			
One-Bedroom Unit	18 units	1 space per DU [c]	18
Two-Bedroom Unit	27 units	2 spaces per DU	54
Three-Bedroom Unit	4 units	2 spaces per DU	8
		Total - Residential	80
Total Project			90
Total On-site Parking Supply			90

[a] The parking minimum rates are from the Burbank Municipal Code, unless specified otherwise.

[b] The Project proposes a conditional use permit to allow for a reduced parking requirement for the combined retail and restaurant land uses.

[c] The Project proposes a density bonus, which would lower the parking space minimum to 1 space per dwelling unit for a one-bedroom unit.

Vehicle Access

The Project would have two driveways:

- One full-access driveway to and from North Hollywood Way Avenue, serving the gated surface parking area
- One full-access driveway via an alley located in the southwest corner of the site along North Screenland Drive, serving the gated subterranean parking garage



The Project would remove three existing driveways on Riverside Drive. The Project driveways should be designed to comply with City design standards. The driveways would not require the removal or relocation of existing passenger transit stops and should be designed and configured to avoid or minimize potential conflicts with transit services and pedestrian traffic.

Pedestrian and Bicycle Access

Pedestrian access to the Project Site would be provided via the existing sidewalks around the perimeter of the Project Site. There is one pedestrian entrance on the alley, adjacent to the driveway, and several entrances on Hollywood Way, Riverside Drive, and Screenland Drive, including through the pocket park on the northwest corner of the site. The existing transit stops along Riverside Drive and Hollywood Way would remain. Residents and visitors arriving to the Project Site by bicycle would have access to the bicycle parking via the pocket park on the northwest corner of the site.

The Project's access locations would be designed to the City standards and provide adequate sight distance, sidewalks, crosswalks, and pedestrian movement controls that meet the City's requirements to protect pedestrian safety. All roadways and driveways will intersect at right angles. Street trees and other potential impediments to adequate driver and pedestrian visibility would be minimal. Pedestrian entrances separated from vehicular driveways would provide access from the adjacent streets, parking facilities, and transit stops.