

Burbank Media District Specific Plan Update

Draft Program Environmental Impact Report

prepared by

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Executive Summary

A Draft Program Environmental Impact Report (EIR) was prepared by the City of Burbank, analyzing the potential environmental impacts of the proposed Burbank Media District Specific Plan Update Project (hereafter referred to as "proposed Project"). The executive summary summarizes the characteristics of the proposed Project, alternatives to the proposed Project, and the environmental impacts and mitigation measures associated with the proposed Project, as described in the Draft Program EIR.

Project Synopsis

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Project Description Summary

The City of Burbank (hereafter referred to as "City" or "Burbank"), in partnership with the Southern California Association of Governments (SCAG), proposes updates to the existing Media District Specific Plan. A specific plan is a policy document that will guide future development of a specific area in the city through specific land use goals/policies and development standards. The existing Specific Plan was adopted in 1991 for the purposes of creating a growth-control plan to ensure that all new development could be accommodated by infrastructure and public services and to preserve the character of the neighborhoods within the Specific Plan Area. The proposed updates to the existing Specific Plan are intended to focus on developing and implementing policies and programs to remove barriers to housing production, streamline the permitting process, and introduce objective design standards for new development within the Specific Plan Area.

The proposed Project includes the following chapters:

- **Chapter 1: Executive Summary.** Provides an overview of the proposed Project and provides direction on how to use the plan document.
- **Chapter 2: Introduction.** Describes the purpose, authority, planning context, relevant City adopted plans and policies, and environmental review for the proposed Project.
- **Chapter 3: Media District Profile**. Covers the existing Media District planning area, demographics, land use, and market profile.

- **Chapter 4: Community Engagement.** Summarizes the outreach efforts involved in the development of the proposed Project.
- **Chapter 5: Vision and Overarching Goals.** States the purpose of updating the Specific Plan and provides overarching goals for planning the Specific Plan Area.
- **Chapter 6: Land Use & Zoning.** Provides information on allowable land uses and zoning designations within the Specific Plan Area.
- **Chapter 7: Development Standards.** Outlines the development standards for land use and zoning designations within the Specific Plan Area to accommodate for future development associated with the proposed Project.
- **Chapter 8: Mobility & Public Realm.** Summarizes the City's transportation vision and goals to support the Specific Plan Area.
- **Chapter 9: Infrastructure.** Describes the proposed Project's infrastructure goals and policies, along with the Specific Plan Area's existing and proposed infrastructure for potable water, recycled water, sewer, stormwater, energy, telecommunications, and solid waste.
- **Chapter 10: Implementation.** Addresses the actions and information needed to implement the vision and goals presented in the Specific Plan.
- **Chapter 11: Definitions.** Provides definitions for terms used throughout the proposed Project.

The proposed Project area is approximately 544-acre (hereafter referred to as "Specific Plan Area"). The Specific Plan Area is generally bounded by the Magnolia Park residential neighborhood to the north, South Keystone Street and residential neighborhood to the east, the Los Angeles River to the south, and the Toluca Lake and Toluca Woods residential neighborhoods in the City of Los Angeles to the west.

The proposed Project would establish updated objective development standards to facilitate the potential new development of up to 9,702 residential units and 3,986,207 square feet of commercial and general business development, and 400 hotel rooms. The development types anticipated would include medium-density residential, high-density residential, mixed-use residential, commercial developments, and up to 400 hotel rooms within Specific Plan Area's opportunity sites. The City identified groupings of underutilized sites within the Specific Plan Area as opportunities for infill and adaptive reuse. These sites are referred to as opportunity sites and would assist in meeting the City's goals of introducing affordable housing, promoting infill development, and catalyzing economic development in proximity to existing employment centers and envisioned transit centers and corridors.

The full project description can be found in Section 2, *Project Description,* of the Draft Program EIR.

Project Objectives

Emphasize Contextual Development

- Develop people-focused streetscapes and buildings that are sensitive to the surrounding intensity and scale of surrounding development.
- Allow sufficient and balanced development opportunities for media, medical, and other commercial establishments within the Media District.
- Encourage higher development intensity in the center of the Media District and transition as it approaches existing low- and medium-scale residential areas.

Transit Oriented Growth

- Align and encourage residential and commercial growth near major transportation resources, including new transit stops, corridors, and with major mobility centers.
- Ensure that non-vehicular infrastructure and public service improvements are designed to accommodate the needs of all existing and future development.
- Encourage more pedestrian and bicycle use through added infrastructure.

Facilitate Streamlined Housing Production

- Establish practical and objective design standards based on community feedback and best practices to ensure neighborhood compatibility and development.
- Encourage affordable and workforce housing development in the center of the Media District.
- Establish policies that will facilitate the streamlined development of a variety of housing in the center of the Media District.

Alternatives

As required by the California Environmental Quality Act (CEQA), this EIR examines alternatives to the proposed project. Studied alternatives include the following two alternatives. Based on the alternatives analysis, Alternative 1 was determined to be the environmentally superior alternative. However, Section 15126.6(e) of Title 14 of the CCR states that "If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Thus, under the strict direction of Section 15126.6(e), the environmentally superior alternative would be identified as the Increased Growth Alternative. In practice, however, the No Project Alternative remains environmentally superior based on the comparative analysis undertaken in this section.

- Alternative 1: No Project Alternative
- Alternative 2: Increased Growth Alternative

Alternative 1 (No Project Alternative) involves the continued implementation of the existing 1991 Media District Specific Plan, 2021-2029 Burbank Housing Element, and the Burbank2035 General Plan. The No Project Alternative would also not expand the Specific Plan Area boundary to include the Warner Bros. Ranch block located north of Oak Street, the Lakeside Shopping Center parcel, or Johnny Carson Park, as included in the proposed Project. The No Project Alternative assumes the housing, commercial and general business development under the proposed Project would not occur, and other land use and mobility strategies associated with the proposed Project would not be implemented. The No Project Alternative assumes that the Burbank2035 General Plan and 2021-2029 Housing Element would continue to accommodate new development in accordance with existing land use designations and zoning regulations of the existing 1991 Media District Specific Plan. The No Project Alternative would not involve modifications of allowable maximum densities or floor area ratio (FAR), as identified for the proposed Project. Thus, the existing density and FAR within the Specific Plan Area would remain under this alternative.

The No Project Alternative would allow for a total development potential of 6,062 residential units, 2,488,411, square feet of non-residential uses, and no hotel rooms. Compared to the proposed Project, the No Project Alternative would result in 3,640 fewer residential units, 1,497,796 fewer square feet of non-residential uses, and 400 fewer hotel rooms. The potential environmental impacts

associated with this Alternative are described under Section 6.1 of the draft Program EIR compared to the potential environmental impacts associated with the proposed Project.

Alternative 2 (Increased Growth Alternative) was analyzed to assess the potential impacts if the updated Specific Plan allows for maximum density under recent State housing laws. This alternative scenario would allow increased density to the same opportunity sites and potential development sites in the Specific Plan Area that are considered under the proposed Project. Thus, the Increased Growth Alternative would involve the same amount of potential ground disturbance as the proposed Project. Compared to the proposed Project, the Increased Growth Alternative would result in a net increase of 4,610 residential units and 3,279,643 square feet of non-residential uses beyond the proposed Project, for a total development potential of 14,312 residential units, 7,265,850 square feet of non-residential uses, and 400 hotel rooms. Ultimately, this alternative would exceed the State requirements regarding SCAG's RHNA allocation of 8,772 residential units. The potential environmental impacts associated with this Alternative are described under Section 6.2 compared to the potential environmental impacts associated with the proposed Project.

Areas of Known Controversy

The EIR scoping process did not initially identify any areas of known controversy for the proposed Project. Responses to the Notice of Preparation of a Draft EIR and input received at the EIR scoping meeting held by the City are summarized in Section 1, *Introduction,* of the Draft Program EIR.

Section 1 also summarizes the seven comments received during the EIR scoping period. The City received letters from one agency, one tribal entity, and five written comments from the public. The environmental comments received generally pertain to issues related to aesthetics (light and shadow), increases in air emissions, land use impacts associated with increased density, utility infrastructure improvements, availability and management of public open space, increased traffic, transit/transportation impacts, and potential alternatives to the proposed project.

Issues to be Resolved

No known issues are to be resolved.

Issues Not Studied in Detail in the EIR

All issue areas were analyzed within the EIR.

Summary of Impacts and Mitigation Measures

Table ES-1,below, summarizes the proposed Project's potential environmental impacts, proposed mitigation measures, and determination of impact after mitigation measure is applied where it is applicable. Impacts are categorized as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per §15093 of the CEQA Guidelines.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under §15091 of the CEQA Guidelines.

- **Less than Significant.** An impact that may be adverse, but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact:** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

In addition, Table ES-2 summarizes the environmental impacts of the proposed Project that were determined to be less than significant or have no impact in accordance with CEQA Guidelines Section 15128 (Effects Not Found to be Significant). The detailed discussion on this topic can be found in Section 4.19, *Effects Found Not to be Significant*, of the Draft Program EIR.

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Table ES-1 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Impact	Mitigation Measure (s)	Residual Impact
Aesthetics		
Impact AES-1. The proposed Project would facilitate infill development that would introduce new sources of light and glare, which would affect day or nighttime views. Compliance with the Burbank Municipal Code (BMC) would reduce potential light and glare impacts to a less-than-significant level.	None required	Less than significant
Air Quality		
Impact AQ-1. Development under the proposed Project would exceed the planned growth under the Burbank2035 General Plan and SCAG's 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). In addition, the proposed Project would result in significant indirect impacts due to population growth. The proposed Project would, therefore, conflict with the growth assumptions or policies of applicable air quality plans such as South Coast Air Quality Management District's (SCAQMD's) 2022 Air Quality Management Plan (AQMP). Impacts would be significant and unavoidable.	No mitigation measures are available to reduce the significant impacts related to conflicts with the 2022 SCAQMD AQMP.	Significant and unavoidable
Impact AQ-2. Construction activities and operation of development under the proposed Project would result in a cumulatively considerable net increase of any criteria pollutant for which the region is a non-attainment area under applicable federal or State ambient air quality standards. Air quality studies and project-specific emissions reduction measures would be required for large projects proposed under the proposed Project. Impacts would be significant and unavoidable.	**AQ-1 Construction Emissions Reduction.** For projects that would include any of the following: demolition of more 13,500 square feet of building area, greater than 5,000 cubic yards of soil cut/fill, greater than five acres of graded area, or use of more than 15 pieces of heavy-duty construction equipment and 195 truck trips on any given day during demolition, site clearing, or grading, as part of the Plan Check Submittal, and at the expense of the Project applicant, the City shall retain a qualified air quality technical specialist to prepare an air quality impact analysis to analyze construction emissions. The air quality analysis shall demonstrate that project emissions are less than the applicable regional thresholds and Localized Significance Thresholds under the South Coast Air Quality Management District (SCAQMD) and, as applicable, may include, but not be limited to, the following mitigation measures: ▪ Off-road diesel-powered construction equipment greater than 50 horsepower shall meet the United States Environmental Protection Agency's Tier 4 emission standards, where available. In the event that Tier 4 engines are not available for any off-road equipment larger than 100 horsepower, that equipment shall be equipped with a Tier 3 engine or an engine that is equipped with retrofit controls to reduce exhaust emissions of nitrogen oxides (NOx) and diesel particulate matter (DPM) to no more than Tier 3 levels unless certified by engine manufacturers or the onsite air quality construction mitigation manager that the use of such devices is not practical for specific engine types. This will be achieved as part of the finalization of a construction management plan. ▪ All construction equipment shall be outfitted with best available control technology (BACT) devices certified by California Air Resources Board (CARB). Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. ▪ Consistent with SCAQMD Rule 403, construction contractors shall identify and implement best available dust control measures during active construction operations capable of generating dust. **AQ-2 Operational Emissions Reduction.** For any project that would include more than 180 multi-family residential units, 900,000 square feet of office space, or any equivalent combination thereof, as part of the Plan Check Submittal, and at the expense of the Project applicant, the City shall retain a qualified air quality technical specialist to prepare an air quality impact analysis to analyze operational emissions. The air quality analysis shall demonstrate that project emissions are less than applicable SCAQMD regional and LST thresholds and, as applicable, may include, but not be limited to, the following mitigation measures: ▪ Implementation of a Transportation Demand Management Plan. ▪ Installation of electric vehicle charging stations ▪ Public infrastructure improvements (e.g., bus stop shelter improvements) ▪ Carpool or ridesharing programs ▪ Subsidized transit costs ▪ Unbundled parking costs ▪ Bicycle amenities (storage, showers, lockers, etc.) ▪ Use of all-electric appliances (i.e., elimination of natural gas service) ▪ Use solar or low emission water heaters that exceed Title 24 requirements ▪ Increased walls and attic insulation beyond Title 24 requirements ▪ Required use of electric lawnmowers, leaf-blowers, and chainsaws	Significant and unavoidable

Impact	Mitigation Measure (s)	Residual Impact
Impact AQ-3. Future development projects under the proposed Project would potentially expose sensitive receptors to substantial pollutant concentrations. Impacts would be significant and unavoidable.	**AQ-1 Construction Emissions Reduction**	Significant and unavoidable
Biological Resources		
Impact BIO-1. The Specific Plan Area is largely urbanized, and the proposed Project would prioritize the development of opportunity sites that have been previously developed and/or disturbed. Nonetheless, future development projects carried out under the proposed Project could potentially adversely impact special-status species, nesting birds, and their habitat. Impacts would be less than significant with adherence to Mitigation Measure BIO-1 which requires biological surveys prior to construction.	**BIO-1 Pre-Construction Nesting Bird Surveys and Nest Avoidance.** For construction activities initiated during the bird nesting season (February 1 through August 31) that involve the removal of trees, vegetation, or other nesting bird habitat, including abandoned structures and other man-made features, a pre-construction nesting bird survey shall be conducted no more than seven days prior to the initiation of ground disturbance and vegetation removal activities. The survey, whose cost shall be the sole responsibility of the development/project applicant, shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in and around the Specific Plan Area. The pre-construction nesting bird survey shall be conducted on foot and shall encompass the construction site and a 300-foot buffer around the construction site. Inaccessible areas (i.e., private property) within the survey boundaries shall be surveyed from afar using binoculars. If nests are found, an avoidance buffer shall be determined by the biologist dependent upon the species, the location of the nest, the proposed work activity, and existing disturbances associated with land uses within and outside of the construction site. The avoidance buffer shall be demarcated by the biologist with brightly colored construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone. No ground disturbing activities shall occur within the buffer zone until the biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into the buffer zone shall occur only at the discretion of the biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s) shall be prepared by the biologist documenting and verifying compliance with the above requirements and applicable State and federal regulations protecting nesting birds that shall be submitted to the City. Site plans shall include a statement acknowledging compliance with the California Fish and Game Code and the Migratory Bird Treaty Act that includes avoidance of active bird nests and identification of protocols to avoid potential impacts to active nests, such as checking for nests prior to construction activities and implementing proper mitigation procedures if an active nest is discovered. Should construction activities be required to occur near an active nest, the biologist shall serve as a construction monitor to ensure that no inadvertent impacts on the nest would occur.	Less than significant with mitigation
Impact BIO-2: The proposed Project would not conflict with any local policies or ordinances. With adherence to Title 7, Chapter 4 of the BMC, no impact would occur.	None required.	No impact
Cultural Resources		
Impact CUL-1. Future development projects facilitated by the proposed Project could adversely affect known historical resources or those resources that have not been identified as eligible for listing in the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR). Impacts to historical resources would be significant and unavoidable.	**CUL-1 Protection, Documentation, and Memorialization of Historical Resources.** The project proponent shall either: a) Demonstrate to the satisfaction of the City of Burbank Community Development Department that the project does not contain any historic resources either due to the site being vacant, age of the structures on the site, or due to the result of the Program LU-4 Historic Preservation Plan evaluation and assessment; or b) For any structure determined to be eligible for listing in a federal, State, or local registry, or currently listed, as a historic resource (typically determined as a result of the Program LU-4 Historic Preservation Plan process), future development under the proposed Project shall comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards). During the planning phase for any future development projects under the proposed Project (prior to any construction activities), input shall be sought from a qualified professional meeting the Secretary of the Interior's Professional Qualifications Standards to ensure compliance of the future development project with the Standards for Rehabilitation. The cost of this assessment shall be borne entirely by the applicant for the future development project. This input shall ensure the avoidance of any direct/indirect physical alterations to historical resources that would result in substantial adverse change to the historical resource. The findings and recommendations of the architectural historian or historic architect shall be documented in a Standards Project Review Memorandum at the schematic design phase. This memorandum shall identify the character-defining features of the historical resource through a review of the building's construction history and analysis of its significant historical and/or architectural associations and shall subsequently analyze all project components for compliance with the Standards for Rehabilitation. Each future development project's components to be analyzed shall include direct and indirect changes to historical resources and their setting. Should design modifications be necessary to bring projects into compliance with the Standards for Rehabilitation, the memorandum shall document those recommendations, which shall then become conditions of approval for the future development project. The report shall be submitted to the City for review and approval upon submittal of an application for building permits or entitlement. c) It may not be possible to design all future development under the proposed Project involving a historical resource to be consistent with the Standards. Development projects inconsistent with the Standards may include those that require the substantial alteration or demolition of a historical resource. If significant historical resources are identified on an individual development site and compliance with the Secretary of the Interior's Standards or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken. Mitigation measures shall include, but may not limited to, documentation of the historical resource in the form of a Historic American Building Survey-like (HABS) report. The report shall be prepared by a qualified professional meeting the Secretary of the Interior's Professional Qualifications and shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation and shall generally follow the HABS Level III requirements, including digital photographic recordation, detailed historic narrative report, and compilation of historical research. The completed HABS-like documentation shall be completed by the owner and shall be submitted to the City of Burbank Department of Community Development prior to issuance of any permits for demolition or alteration of the historical resource.	Significant and unavoidable

Impact	Mitigation Measure (s)	Residual Impact
Impact CUL-2. Development facilitated by the proposed Project update could adversely affect identified and previously unidentified prehistoric and historical archaeological resources. Impacts would be less than significant with the implementation of mitigation, as well as the policies outlined in the City of Burbank's Historic Resource Management Ordinance Program LU-4: Historic Preservation Plan of the Burbank2035 General Plan.	**CUL-2a Archaeological Resources Assessment.** For any future development project facilitated by the Burbank Media District Specific Plan that is subject to the California Environmental Quality Act (CEQA), a Phase I Archaeological Resources Study (Phase I) shall be prepared if the future development project will involve ground disturbance, unless the project site has previously been subject to a Phase I within the past 10 years or is within soils that can be reliably demonstrated as being non-native or artificial fill. The study shall be performed by a qualified professional meeting the Secretary of the Interior's (SOI) Professional Qualification Standards for archaeology (National Park Service 1983) at the owner's expense. Methods shall include a pedestrian survey of the project site and sufficient background research and field sampling to determine whether archaeological resources may be present. Archival research shall include a records search of the South Central Coastal Information Center (SCCIC) no more than two years old and a Sacred Lands File search with the Native American Heritage Commission. The Phase I technical report documenting the study shall include recommendations that must be implemented prior to and/or during construction to avoid or reduce impacts on archaeological resources. Depending on the archaeological sensitivity of the project site, such recommendations shall include cultural resources sensitivity training provided to construction workers prior to construction and/or the implementation of archaeological and Native American monitoring during project related ground disturbance. The Phase I report shall be submitted to the City of Burbank Community Development Department, Building and Safety Division for review and approval prior to the issuance of any grading or construction permits. Recommendations in the Phase I report shall be made Conditions of Approval and shall be implemented throughout all ground disturbance activities. If the Phase I report identifies cultural resources that may be impacted by the future development project under the proposed Project, an Extended Phase I testing and/or Phase II testing and evaluation shall be conducted at the owner's expense and submitted to the City of Burbank Community Development Department, Building and Safety Division for review and approval prior to the issuance of any grading or construction permits. If resources are determined significant or unique through Phase II testing, impacts shall be reduced to less-than-significant levels by site avoidance or capping. If site avoidance is not possible, appropriate site-specific mitigation measures shall be identified. These measures shall include, but not be limited to, a Phase III data recovery program, mapping the location of artifacts, surface collection of artifacts, or excavation of the cultural deposit to characterize the nature of the buried portions of sites. Curation of the excavated artifacts or samples shall occur as specified by the archaeologist. The Phase III evaluation shall be submitted to the City of Burbank Community Development Department, Building and Safety Division for review and approval prior to the issuance of any grading or construction permits. If a future development project under the proposed Project would solely involve the refurbishment of an existing building and no ground disturbance would occur, this measure would not be required. **CUL-2b Unanticipated Discovery of Cultural Resources.** If cultural resources are discovered during activities related to construction of any future development project under the proposed Project, all work in the immediate vicinity of the find (within a 50-foot buffer at minimum dependent on the discovery type) shall cease and a qualified archaeologist meeting SOI standards retained by the applicant of the future development project shall assess the find. Work on portions of the future development project outside of the buffered area may continue during this assessment period. Should the find involve a resource of Native American origin, the applicant of the future development project shall retain a Native American monitor from one or more of the consulting tribes on the NAHC list with ancestral ties to the Project Area to participate in the evaluation of the resource as defined by CEQA) (as amended, 2015) and to observe all remaining ground-disturbing activities, including, but not limited to, clearing, grading, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, leveling, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for California Register for Historical Resources (CRHR)/National Register for Historic Places (NRHP) eligibility shall be completed. If the resource proves to be eligible for the CRHR/NRHP and significant impacts to the resource cannot be avoided via development redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of the CEQA Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and/or Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The City shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System at the SCCIC at California State University at Fullerton pursuant to CEQA Guidelines Section 15126.4(b)(3)(C). **CUL-2(c) Disposition and Treatment of Inadvertent Discoveries.** The Burbank Community Development Department and/or applicant shall, in good faith, consult with the consulting tribe(s) on the disposition and treatment of any tribal cultural resource encountered during all ground disturbing activities.	Less than significant with mitigation
Impact CUL-3. Ground-disturbing activities associated with development under the proposed project could result in damage to or destruction of human remains. Impacts would be less than significant with the implementation of mitigation, as well as the policies outlined in the Burbank Preservation Regulations and Program LU-4: Historic Preservation Plan of the Burbank2035 General Plan.	None required	Less than significant
Energy		
Impact E-1. The proposed Project would promote urban infill and create diverse and walkable neighborhoods. Neither construction nor operation of future development projects under the proposed Project would result in a significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.	None required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Impact E-2. Future development under the proposed Project would be required to comply with applicable State and local plans and policies for renewable energy and energy efficiency. The proposed Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and there would be a less than significant impact.	None required	Less than significant
Geology/Soils		
Impact GEO-1. Development facilitated by the proposed Project could result in exposure of people or structures to risk of loss, injury, or death involving strong seismic ground shaking; however, impacts would be less than significant with required adherence to existing regulations.	None required	Less than significant
Impact GEO-2. Development facilitated by the proposed Project could result in exposure of people or structures to a risk of loss, injury, or death involving liquefaction; however, impacts would be less than significant with required adherence to existing regulations.	None required	Less than significant
Impact GEO-3. Construction of development projects carried out under the proposed Project could result in soil erosion, but impacts would be less than significant with required adherence to existing regulations.	None required	Less than significant
Impact GEO-4. Development facilitated by the proposed Project may be at risk of landslides, lateral spreading, liquefaction, or collapse; however, impacts would be less than significant with required adherence to existing regulations.	None required	Less than significant
Impact GEO-5. Development carried out under the proposed Project may result in construction of structures on expansive soils that could create a substantial risk to life or property, but all new development would be required to comply with the standards of the California Building Code (CBC), which would ensure that expansive soils are remediated or that foundations and structures are engineered to withstand the forces of expansive soil. Compliance with these requirements would reduce this impact to a less-than-significant level.	None required	Less than significant
Impact GEO-6. Development facilitated by the proposed Project has the potential to impact paleontological resources during construction activities. Impacts would be less than significant with mitigation incorporated.	**GEO-1a Paleontological Resources Assessment.** The City of Burbank shall require the following for projects that have the potential to impact previously undisturbed sediments greater than five feet below the surface in the Specific Plan Area, including sediments at depths beyond where previous excavations have reached. Prior to initial ground disturbance, the project applicant shall retain a Qualified Professional Paleontologist, as defined by Society of Vertebrate Paleontology (SVP; 2010), to conduct a paleontological resources assessment (PRA). The PRA shall determine the paleontological sensitivity of geologic formations underlying the proposed disturbance area, consistent with SVP (2010) guidelines for categorizing paleontological sensitivity, and the potential for the project to impact those formations, including a paleontological records search of the Natural History Museum of Los Angeles County (NHMLAC). The specific nature of the project's ground-disturbing activities, local natural topography, and depth of previous disturbance should be taken into account for this impact analysis. If the PRA determines that the project may impact paleontological resources, then the Developer shall implement GEO-1b to mitigate those impacts. **GEO-1b Paleontological Resources Mitigation.** If the PRA determines that a project may significantly impact paleontological resources, the following actions shall be enacted: ▪ Qualified Paleontologist per Society of Vertebrate Paleontology (SVP 2010) guidelines to review project plans to determine if underlying paleontologically sensitive units (i.e., early Holocene to Pleistocene age deposits [Qoa]) could be impacted. If potentially significant impacts are identified, the qualified professional paleontologist shall prepare and implement a Paleontological Resources Mitigation Plan (PRMP). In general, ground-disturbing activities within previously undisturbed paleontologically sensitive sediments should be monitored on a full-time basis. The PRMP shall describe mitigation requirements, including paleontological monitoring procedures; communication protocols to be followed in the event that an unanticipated fossil discovery is made during project development; and preparation, curation, and reporting requirements. The PRMP shall be submitted to the City prior to the beginning of construction for review and approval. ▪ The Qualified Paleontologist or his or her designee shall conduct Worker Environmental Awareness Program (WEAP) training for the general contractor, subcontractor(s), and all construction workers participating in earth disturbing activities, regarding the appearance of fossils and the procedures for notifying paleontological staff in the event that fossils are discovered by on-site personnel. The WEAP shall be conducted at the time of a preconstruction meeting. A training acknowledgment form must be signed by all workers who receive the training and retained by the City. ▪ Monitoring during ground construction activities (i.e., grading, trenching, foundation work, and other excavations) shall be conducted by a qualified paleontological monitor, who is defined as an individual who meets the minimum qualifications per standards set forth by the SVP (2010), which includes a B.S. or B.A. degree in geology or paleontology with one year of monitoring experience and knowledge of collection and salvage of paleontological resources. The duration and timing of the monitoring and the location and extent of proposed ground disturbance shall be outlined in the PRMP. If the Qualified Paleontologist determines that the monitoring methods should be changed from what is outlined in the PRMP based on the	Less than significant with mitigation

Impact	Mitigation Measure (s)	Residual Impact
	specific geologic conditions at the surface or at depth (e.g., reduced/increased in frequency, ceased entirely), the Qualified Paleontologist may recommend such changes to the City for their review and approval. ▪ In the event a fossil is discovered by construction personnel or the paleontological monitor, all work in the immediate vicinity of the find shall cease and the Qualified Paleontologist shall be contacted to evaluate the find before re-starting work in the area. If it is determined that the fossil(s) is (are) scientifically significant, the Qualified Paleontologist shall complete the mitigation outlined below (GEO-1c) to mitigate impacts to significant fossil resources. **GEO-1c Fossil Discovery, Preparation, And Curation.** If a paleontological resource is discovered at any time during earthmoving activities, the construction contractor shall ensure that all construction activities in the immediate area of the find are halted and diverted, and the City is contacted. A Qualified Paleontologist shall be retained (if not done so already) to evaluate the discovery. The paleontologist shall have the authority to temporarily direct, divert, or halt construction activity around the find until it is assessed for scientific significance and collected to ensure that the fossil(s) can be removed in a safe and timely manner. Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection (such as the NHMLAC]) along with all pertinent field notes, photos, data, and maps.	
Greenhouse Gas Emissions		
Impact GHG-1. The proposed Project would not generate GHG emissions that either directly or indirectly produce a significant impact on the environment. In addition, the proposed Project would be consistent with state plans to meet the GHG reduction target established by California Senate Bill (SB) 32 (State Scoping Plan), the 2024-2050 RTP/SCS, the City's Greenhouse Gas Reduction Plan (GGRP) Update, and the Burbank2035 General Plan Air Quality and Climate Change Element. Therefore, impacts related to greenhouse gas (GHG) emissions would be less than significant.	None required	Less than significant
Hazards and Hazardous Materials		
Impact HAZ-1. Demolition, construction, and operation activities associated with development accommodated by the proposed Project may result in the release of potentially hazardous materials. However, compliance with regional and federal regulations and the City's Safety Element policies would minimize the risk of releases and exposure to these materials, and impacts would be less than significant.	None required	Less than significant
Impact HAZ-2. Development accommodated by the proposed Project could potentially result in the release of hazardous materials into the environment within 0.25-mile of an existing or proposed school. However, compliance with existing regulations would minimize the risk of exposure to these substances. Impacts would be less than significant.	None required	Less than significant
Impact HAZ-3. Implementation of the proposed Project could accommodate development on or near hazardous materials sites. However, compliance with applicable regulations relating to site cleanup and implementation of Mitigation Measure HAZ-1 would minimize hazards from development on contaminated sites. Impacts would be less than significant with mitigation incorporated.	**HAZ-1 Property Assessment – Phase I and II ESA's.** Prior to the start of construction (demolition or grading) of any future development project under the proposed Project, the project applicant shall retain a qualified environmental professional, as defined by ASTM E-1527, to complete one of the following. If the project is not listed in Appendix F of this EIR, Department of Toxic Substances Control (DTSC) (GeoTracker) or California State Water Resources Control Board (SWRCB) (EnviroStor) databases, and requires more than five feet of excavation, then the proponent shall retain an environmental consultant, California Professional Geologist (PG) or California Professional Engineer (PE), to prepare a Phase I ESA. Any and all recommended actions included in the Phase I ESA shall be followed. If the Phase I ESA identifies recognized environmental conditions or potential concern areas, a Phase II ESA shall be prepared. If the project site is currently listed, previously listed, or un-listed with a regulatory closure or no further action letter in Appendix F, DTSC (GeoTracker) or SWRCB (EnviroStor) databases, then the project proponent shall retain a qualified environmental consultant, California Professional Geologist (PG) or California Professional Engineer (PE), to prepare a Phase II ESA to determine whether the soil, groundwater, and/or soil vapor has been impacted at concentrations exceeding regulatory screening levels for commercial/industrial land uses. Any and all recommended actions included in the Phase II ESA shall be followed. This shall include the preparation of a Soil Management Plan (SMP) for Impacted Soils (see below) prior to project construction and/or completion of remediation prior to onsite construction. The completed ESAs shall be submitted to the lead agency for review and approval prior to issuance of building or grading permits. **Soil Management Plan Requirements:** The SMP, or equivalent document, shall be prepared to address on-site handling and management of impacted soils or other impacted wastes, and reduce hazards to construction workers and offsite receptors during construction. The plan shall be submitted to the lead agency and must establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and prevent off-site migration of contaminants from the site. These measures and practices shall include, but are not limited to: ▪ Stockpile management including stormwater pollution prevention and the installation of BMPs ▪ Proper disposal procedures of contaminated materials ▪ Monitoring and reporting	Less than significant with mitigation

Impact	Mitigation Measure (s)	Residual Impact
	▪ A health and safety plan for contractors working at the site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection ▪ The health and safety plan will also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction. The lead agency shall review and approve the development site SMP for impacted soils prior to demolition and grading (construction). **Soil Remediation Requirements:** If soil present within the construction envelope at the development site contains chemicals at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), the project proponent shall retain a qualified environmental consultant (PG or PE), to conduct additional analytical testing and recommend soil disposal recommendations, or consider other remedial engineering controls, as necessary. The qualified environmental consultant shall utilize the development site analytical results for waste characterization purposes prior to offsite transportation or disposal of potentially impacted soils or other impacted wastes. The qualified environmental consultant shall provide disposal recommendations and arrange for proper disposal of the waste soils or other impacted wastes (as necessary), and/or provide recommendations for remedial engineering controls, if appropriate. The project applicant shall review and approve the disposal recommendations prior to transportation of waste soils offsite, and review and approve remedial engineering controls, prior to construction. Remediation of impacted soils and/or implementation of remedial engineering controls may require additional delineation of impacts; additional analytical testing per landfill or recycling facility requirements; soil excavation; and offsite disposal or recycling. The lead agency shall review and approve the development site disposal recommendations prior to transportation of waste soils offsite and review and approve remedial engineering controls, prior to construction.	
Impact HAZ-4. The proposed project does not include any proposed physical changes that would interfere or impair emergency response or evacuation. Additionally, traffic created by project implementation would not interfere with an evacuation plan. Therefore, the proposed Project would not interfere with these types of adopted plans. Impacts would be less than significant.	None required	Less than significant
Impact HAZ-5. Portions of the Specific Plan Area are within a very high fire hazard severity zone (VHFHSZ). However, compliance with Burbank2035 Safety Element policies and existing State and local building standards would ensure impacts related to wildland fires would be less than significant.	None required	Less than significant
Hydrology and Water Quality		
Impact HYD-1. Future development projects under the proposed Project would increase water usage, but such uses would be less than significant because there would be sufficient water supply available to meet the projected growth without depletion of groundwater supplies. Future development projects under the proposed Project may also incrementally increase the amount of impervious surfaces in the Specific Plan Area, resulting in increased runoff and decreased percolation to the San Fernando Basin. However, with adherence to low impact development (LID) Ordinance requirements and best management practices (BMPs), these impacts would be less than significant.	None required	Less than significant
Impact HYD-2. The proposed Project would not conflict with or obstruct the Basin Plan due to mandatory compliance with federal, State, and local regulations. Furthermore, the Specific Plan Area is within an adjudicated and “Very Low Priority” basin; therefore, development of a groundwater sustainability plan is not required, and the proposed Project would not conflict with or obstruct a sustainable groundwater management plan. Impacts would be less than significant.	None required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Land Use and Planning		
Impact LU-1. The proposed Project would be consistent with SCAG's 2024-2050 RTP/SCS goals and policies. The proposed Project would also be consistent with the BMC and Burbank2035 General Plan Land Use Map, with approval of the General Plan Land Use amendment and zone text amendment included in the proposed Project. However, the proposed Project would conflict with policies under the Burbank2035 General Plan related to air quality and wastewater impacts. The proposed Project would implement Mitigation Measures AQ-1 and AQ-2 to reduce short-term and long-term criteria pollutants, but implementation would not reduce emissions below SCAQMD regional significance thresholds. The proposed Project would require implementation of Mitigation Measures UTIL-1a through UTIL-1e, and UTIL-3a through UTIL-3b to reduce potential impacts to wastewater system conveyance and treatment capacity, but would not reduce impacts to a less than significant level within the proposed Project horizon. Thus, impacts related to consistency with the Burbank2035 General Plan would be significant and unavoidable.	**AQ-1** and **AQ-2** **UTIL-1a, UTIL-1b, UTIL-1c, UTIL-1d, UTIL-1e, UTIL-3a** and **UTIL-3b**	Significant and unavoidable
Noise		
Impact NOI-1. Construction associated with future development projects accommodated under the proposed Project would be required to comply with the construction day and time restrictions specified in the BMC. Depending on the scope of development facilitated by the proposed Project, construction may involve long durations, substantial soil movement, use of large, heavy-duty equipment, and/or pile driving near noise-sensitive land uses, which may produce noise levels that exceed the applicable Federal Transit Administration (FTA) daytime noise limits. Implementation of Mitigation Measures NOI-1a through NOI-1i would reduce construction noise levels to below thresholds; however, because details of future project-specific construction activities are unknown at this time, temporary construction noise impacts would be significant and unavoidable.	**NOI-1a Shielding and Silencing.** Powered construction equipment (including combustion engines), fixed or mobile, shall be equipped with noise shielding and silencing devices consistent with manufacturer's standards or the Best Available Control Technology. Equipment shall be properly maintained, and the project applicant or owner shall require any construction contractor to keep documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications. **NOI-1b Construction Staging Areas.** Construction staging areas shall be located as far from noise-sensitive uses as reasonably possible and feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. **NOI-1c Smart Back-Up Alarms.** Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction. **NOI-1d Equipment Idling.** Construction vehicles and equipment shall not be left idling for longer than five minutes when not in use. **NOI-1e Workers' Radios.** All noise from workers' radios, including any on-site music, shall be controlled such that they are not audible at off-site noise-sensitive uses. **NOI-1f Use of Driven Pile Systems.** Driven (impact), sonic, or vibratory pile drivers shall not be used, except in locations where the underlying geology renders alternative methods infeasible, as determined by a soils or geotechnical engineer and documented in a soils report. **NOI-1g Temporary Sound Barriers.** Temporary sound barriers, such as walls or sound blankets, shall be positioned between construction activities and noise-sensitive uses when modeled noise levels from construction equipment exceed applicable standards and have a direct line-of-sight with noise sensitive receivers. Placement, orientation, size, and density of acoustical barriers shall be specified by a qualified acoustical consultant. **NOI-1h Noise Complaint Response.** Project applicants shall designate an on-site construction project manager who shall be responsible for responding to any complaints about construction noise. This person shall be responsible for responding to concerns of neighboring properties about construction noise disturbance and shall be available to respond to any construction noise complaints during the hours that construction is to take place. They shall also be responsible for determining the cause of the noise complaint (e.g., bad silencer) and shall require that reasonable measures be implemented to correct the problem. A toll-free telephone number and email address shall be posted in a highly visible manner on the construction site at all times and provided in all notices (mailed, online website, and construction site postings) for receiving questions or complaints during construction and shall also include procedures requiring that the on-site construction manager respond to callers and email messages. The on-site construction project manager shall be required to track complaints pertaining to construction noise, ongoing throughout demolition, grading, and/or construction and shall notify the City's Community Development Director of each complaint occurrence. **NOI-1i Project-Specific Construction Noise Study.** A Construction Noise Study, prepared by a qualified noise expert to meet the requirements herein, shall be required for future development projects located within 500 feet of noise-sensitive land uses identified in the Burbank2035 General Plan Noise Element (i.e., residential areas, hospitals, convalescent and day care facilities, schools, and libraries), and that have one or more of the following characteristics: ▪ Two subterranean levels or more (generally more than 20,000 cubic yards of excavated soil material); ▪ Construction durations of 18 months or more (excluding interior finishing); ▪ Use of large, heavy-duty equipment rated 300 horsepower or greater; ▪ The potential for pile driving; or ▪ Located within 1,000 feet of other construction projects with overlapping construction schedules. The Construction Noise Study shall characterize sources of construction noise, quantify noise levels at noise-sensitive uses (i.e., residential areas, hospitals, convalescent and day care facilities, schools, and libraries) and identify measures to reduce noise exposure. The Construction Noise Study shall identify reasonably available noise reduction devices or techniques to reduce noise levels to acceptable levels and/or durations, including through reliance on any relevant federal, state, or local standards or guidelines or accepted industry practices. Noise reduction devices	Significant and unavoidable

Impact	Mitigation Measure (s)	Residual Impact
	or techniques may include, but not be limited to, silencers, enclosures, sound barriers, and/or placement of restrictions on equipment or construction techniques (e.g., alternative installation methods to pile driving such as cast-in-place systems or pile cushioning). Each measure in the Construction Noise Study shall identify anticipated noise reductions at noise-sensitive land uses. Project applicants shall be required to comply with all requirements of Mitigation Measures NOI-1a through NOI-1i in addition to any additional requirements identified and recommended by the Construction Noise Study and shall maintain proof that notice of, as well as compliance with, the identified measures have been included in contractor agreements.	
Impact NOI-2. Operation of future development projects facilitated by the proposed Project would result in the addition of stationary noise sources (primarily heating, ventilation, and air conditioning [HVAC] equipment) at development sites and increases in traffic noise along roadways within the Specific Plan Area. However, operational noise impacts associated with these sources would not exceed applicable standards and would be less than significant.	None required	Less than significant
Impact NOI-3. Construction associated with future development under the proposed Project would intermittently generate groundbourne vibration within and adjacent to individual development sites. Implementation of Mitigation Measure NOI-2 would reduce vibration impacts to below applicable thresholds for building damage. Therefore, impacts related to vibration would be less than significant with mitigation.	**NOI-2 Vibration Control Plan.** Prior to issuance of a building permit for a project requiring any of the following activities, the project applicant shall prepare a groundborne noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to such activities: ▪ Use of a pile driver within: ▫ 135 feet of fragile/historic structures; or ▫ 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings); or ▫ 75 feet of engineered concrete and masonry (no plaster). ▪ Use of a vibratory roller within: ▫ 40 feet of fragile/historic structures; or ▫ 25 feet of any other structure. ▪ Use of a dozer (or other similar large earthmoving equipment) within: ▫ 20 feet of fragile/historic structures; or ▫ 15 feet of any other structure. This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The groundborne noise and vibration analysis shall include measures to ensure that vibration levels shall not exceed FTA architectural damage thresholds (e.g., 0.12 in/sec PPV at fragile/historic structures, 0.2 in/sec PPV at non-engineered timber and masonry buildings, and 0.3 in/sec PPV at engineered concrete and masonry buildings). If vibration levels are expected to exceed any of these thresholds, alternative methods for pile driving (e.g., pile cushioning, drilled piles, cast-in-place systems, etc.) and/or use of alternative equipment types (e.g., use of static rollers in lieu of vibratory rollers, use of lower horsepower earthmoving equipment, etc.) shall be employed. If necessary, construction vibration monitoring during construction activities shall be conducted to verify FTA vibration thresholds are not exceeded. Additionally, pursuant to Section 10-1-2140.A of the BMC, any activity which may cause vibrations within 500 feet of any BMC- designated studio property within the Specific Plan Area shall be disclosed to said studio at least two weeks prior to the start of vibration-generating activities.	Less than significant with mitigation
Population and Housing		
Impact POP-1. Development under the proposed Project would exceed the planned growth under the Burbank2035 General Plan and SCAG's 2024-2050 RTP/SCS. However, the proposed Project encourages growth in the center of the Specific Plan Area near existing and future transit options and would provide guidance and standards to ensure that the anticipated growth is accommodated. Therefore, the proposed Project would not result in unplanned population and housing growth, and potential impacts would be less than significant.	None required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Public Services		
Impact PS-1. Future development projects under the proposed Project would result in an increase in population in the City, which would increase demand for fire protection services, resulting in the need for additional and/or expanded fire protection facilities. Development impact fees would offset the impacts related to construction of new facilities or expansion of existing facilities, the need for which would be due to cumulative growth in the area. The locations of future new or expanded facilities are not known at this point in time and environmental impacts would be speculative. However, compliance with applicable codes and regulations and compliance with General Plan goals and policies would direct the City to continue reviewing fire protection needs and adequately provide services for those needs on a project-level basis, which would reduce potential impacts related to fire protection and emergency medical services to a less-than-significant impact.	None required	Less than significant
Impact PS-2. Future development projects under the proposed Project would result in an increase in population in the City, which would increase demand for police protection services, resulting in the need for additional staff and equipment. However, conformance with General Plan policies and programs related to police protection would require the City to continue to provide funding and adequate staffing, facilities, equipment, and technology to meet existing and projected service demands and response times. Therefore, this impact would be less than significant.	None required	Less than significant
Impact PS-3. Future development projects under the proposed Project would result in an increase in population in the Specific Plan Area, resulting in the need for new or expanded school facilities. However, California Education Code 17620 would require funding for the provision of new or expansion of existing school facilities to offset impacts from new residential development. This impact would be less than significant.	None required	Less than significant
Impact PS-4. Future development projects accommodated under the proposed Project would result in an increase in population in the City, which would increase demand for parks and recreation services. However, the proposed Project would not directly introduce or expand existing parks, and conformance with General Plan policies and programs related to open space would require future development to accommodate the anticipated increase in new residents. Therefore, this impact would be less than significant.	None required	Less than significant
Impact PS-5. Future development projects under the proposed Project would result in an increase in population in the City, which would increase demand for other public facilities. However, the Specific Plan would not create the need for new or expanded libraries. Therefore, impacts related to the City's library system would be less than significant.	None required	Less than significant
Recreation		
Impact REC-1. Development under the proposed Project may increase the use of existing parks and open space, but the Burbank2035 General Plan includes policies that require new developments to contribute to recreational facilities, as well as City park dedication fees and development impact fees, which would offset recreational facility impacts. Therefore, potential impacts related to substantial physical deterioration of recreational facilities would be less than significant.	None required	Less than significant.

Impact	Mitigation Measure (s)	Residual Impact
Transportation		
Impact TRA-1. Implementation of the proposed Project would result in vehicle miles traveled (VMT) reductions for all three target metrics; however, it would not achieve the required reduction threshold for home-based work VMT per employee. Therefore, the proposed Project would conflict with CEQA Guidelines 15064.3(b), and impacts would be significant and unavoidable.	No feasible mitigation measures have been identified at the program level that would reduce the VMT impact to a less-than-significant level.	Significant and unavoidable
Tribal Cultural Resources		
Impact TCR-1. Future development projects accommodated by the proposed Project could adversely impact tribal cultural resources. Impacts would be less than significant with implementation of mitigation and through consultation conducted pursuant to the requirements of Assembly Bill (AB) 52 and SB 18.	**TCR-1 Native American Monitoring.** If it is determined under Mitigation Measure CUL-2 that Native American monitoring is required, Mitigation Measures TCR-1 shall be used as to guide for monitoring. Prior to initiation of any future development project under the proposed Project, a Native American monitor from one of the consulting tribes for the Specific Plan Area shall be retained. In general, Native American monitoring shall be limited to initial ground disturbance that is defined as construction-related earthmoving of sediments from their native place of deposition, which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, leveling, excavation, trenching, compaction, plowing, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [boulders, walls, etc.], and archaeological work. Initial ground disturbance does not include any secondary movement of sediment that might be required for a project (e.g., backfilling). If more than one consulting tribe wish to be present for monitoring, they shall be present on a rotating basis. The Native American monitor(s) shall have the authority to halt and redirect work should any potential cultural resources be identified during monitoring. If potential tribal cultural resources are encountered during ground-disturbing activities, work within 50 feet of the find shall be halted, and the find shall be evaluated for listing in the CRHR. Native American monitoring may be reduced or be halted at the discretion of the City, in consultation with the tribes consulting on the specific future development project, as warranted by conditions, such as encountering bedrock, sediments being excavated are fill, or negative findings during the first 50 percent of ground disturbance. If monitoring is reduced to spot-checking, spot-checking shall occur when ground disturbance moves to a new location within the site of the future development project and/or when ground disturbance extends to depths not previously reached (unless those depths are within bedrock).	Less than significant with mitigation
Utilities/Service Systems		
Impact UTIL-1. Future development projects under the proposed Project would require utility service and connections for water supply, wastewater conveyance, and stormwater conveyance, as well as telecommunications, electricity, and natural gas. Existing utility systems for water, electric power, natural gas, and telecommunications facilities in Burbank have sufficient capacity to serve future development projects under the proposed Project; however, new connections to existing and expanded wastewater service systems would be required, and such connections would result in exceedance of the Burbank Water Reclamation Plant's (BWRP) current capacity causing potentially significant environmental effects. Potential future improvements necessary to increase the treatment capacity of the BWRP have been preliminarily established. Short- and long-term mitigation measures are required to reduce the potential impacts and increase the treatment capacity of the BWRP. Nonetheless, impacts to the wastewater treatment facilities from the proposed Project remain significant and unavoidable until the future wastewater system improvements are implemented.	**UTIL-1a Completion of a Sewer Service Constraints Analysis.** The City will complete the ongoing analysis to identify specific sewer service constraints and sewer capacity issues within the City's wastewater system including a Citywide assessment of system capacity relative to future development under the proposed Project and more broadly throughout the City. The analysis will identify upgrades necessary to mitigate the constraints in the system to ensure that future development projects implemented under the proposed Project can be completed and that sufficient capacity and conveyance in the wastewater system exists. If a proposed development has a construction schedule that the City cannot accommodate prior to the completion of this analysis, the developer may be responsible for performing the necessary sewer infrastructure upgrades per BMC 8-1-304. **UTIL-1b Complete a Sewer Master Plan.** Based on the constraints identified in the sewer service constraints analysis, the City's Public Works Department will complete the ongoing Sewer Master Plan to evaluate the City's sewer conveyance and treatment system over the next ten years (i.e., the proposed Project planning horizon) and beyond. The Sewer Master Plan will identify a plan to complete specific capital improvements to upgrade the City's wastewater treatment system, including improvements to the Burbank Water Reclamation Plant, to reduce identified constraints and address capacity issues to accommodate future development under the proposed Project in combination with broader projected future Citywide development. **UTIL-1c Develop a Capital Improvement Project.** Based on the Focused Sewer Capacity Analysis, the City's Public Works Department will develop a long-term capital improvement project in the Sewer Master Plan to upsize approximately 3.8 miles of gravity main improvements to accommodate projected flows from the proposed Project. **UTIL-1d Prepare an Updated Nexus Fee Study to Allocate Pro-Rata Infrastructure Costs to Future Development.** To fund the capital improvements identified in the Sewer Master Plan, the City's Public Works Department will prepare an updated nexus fee study to develop a fair share requirement in the form of a wastewater connection or similar project impact fee, which helps to pay for implementation of upgrades necessary to accommodate future development under the proposed Project, including development where deficiencies in the system are identified to exist. Through the fee study, subsequent cost recovery fees applied to individual future development projects will be based on a rough proportionality related to demands on the system reasonably attributed to the future development project. In the event it is determined that necessary upgrades to serve a project cannot be completed by the City prior to project completion, the City may require the developer to perform the necessary sewer infrastructure upgrades (Per BMC 8-1-304) at cost to the developer, or may choose to enter into a reimbursement agreement so that a developer may fund and construct the improvements within the necessary timeframe with subsequent partial reimbursement. If the City and Developer mutually agree to enter into reimbursement agreement (approved as to form by the City Attorney and approved by the City Council), it would be administered by the City's Public Works Director on behalf of the City. **UTIL-1e Prepare Updated Cost of Service and Rate Study and Update Sewer Service Charge if Warranted.** The City's Public Works Department will prepare an updated cost of service and rate study to determine whether the Sewer Service Charge (SSC) imposed on new sewer connections resulting from future development under the proposed Project require updates to reflect the City's actual costs associated with providing sewer services. If such updates are warranted, the SSC will be updated to reflect actual costs of providing related sewer services.	Significant and unavoidable impact related to wastewater systems. Impacts related to water supply, stormwater, telecommunication, electricity, and natural gas would be less than significant.

Impact	Mitigation Measure (s)	Residual Impact
Impact UTIL-2. Future development projects under the proposed Project would require an increase in temporary recycled water supplies during construction and an increase in long-term water supply during operation and maintenance. Growth under the proposed Project is accounted for in the Burbank Water and Power (BWP) 2020 Urban Water Management Plan and sufficient water supplies are available to serve future development projects under the proposed Project. Potential impacts would be less than significant.	None required	Less than significant
Impact UTIL-3. Wastewater generated in the City of Burbank is conveyed to and treated at the Burbank Water Reclamation Plant (BWRP). Future development projects under the proposed Project would increase wastewater generation commensurate with the increased population, which would result in additional wastewater flows that would exceed the existing capacity of the BWRP. Due to these flows, and the constraints within the City's treatment system, potentially significant impacts could result if the full buildout of the proposed Project is realized, and would require substantial facility improvements to accommodate this additional wastewater flow. Short- and long-term mitigation measures are required to reduce the potential impacts and ensure upgrades to the system. Nonetheless, necessary improvements to accommodate this additional wastewater flow are not expected to be completed within the 10-year planning horizon. Therefore, impacts would remain significant and unavoidable until the plans and upgrades are implemented.	**UTIL-3a Expansion and Upgrades to BWRP Treatment Facilities.** The City's Public Works Department shall plan for and complete future improvements to expand and upgrade BWRP treatment facilities consistent with the Focused Sewer Capacity Analysis and forthcoming Sewer Constraints Analysis and Sewer Master Plan, including but not limited to, upgrades to the headworks, the acquisition of land adjacent to the BWRP facilities, the addition of new primary clarifiers, expansion of the equalization basins, modifications to the secondary treatment process, and upgrades to other parts of the sewage treatment process. **UTIL-3b Capital Improvement Program and Alignment with the City's General Plan.** On an annual basis, the City's Community Development Department, acting by and through the City Planner or the City Planning Commission, shall review the Citywide Capital Improvement Program to ensure its conformity with the City's adopted general plan.	Significant and unavoidable
Impact UTIL-4. Solid waste generated within the Specific Plan Area would be transported to Burbank Landfill Site No. 3, Sunshine Canyon Landfill, Simi Valley Landfill & Recycling Center, and Antelope Valley Public Landfill which have adequate remaining capacity to accommodate the proposed Project. Impacts would be less than significant.	None required	Less than significant
Wildfire		
Impact W-1. The southern portion of Specific Plan Area is designated as a VHFHSZ within an Local Responsibility Area (LRA). Future development projects accommodated by the proposed Project would not involve any project components that would impair an emergency response plan or emergency evacuation plan. Generally, compliance with the City's regulations and site plan review would be expected to avoid impairment and potential impacts related to adopted emergency response plans or emergency evacuation plans. Impacts would be less than significant.	None required	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Impact W-2. Future development accommodated by the proposed Project could potentially occur within a VHFHSZ and construction activities could exacerbate wildfire risks. Mitigation Measure W-1 would require measures to reduce construction-related wildfire risks, and impacts would be less than significant with mitigation incorporated.	**W-1 Construction Wildfire Risk Reduction.** For future development under the proposed Project in a VHFHSZ, the future development project applicant shall include mitigation to reduce risk of loss, injury, or death from wildfire, including: 1. All construction equipment powered by internal combustion engines shall be equipped with spark arresters. The spark arresters shall be maintained per manufacturer recommendations to ensure adequate performance. 2. Prohibit certain project construction activities with potential to ignite wildfires during red-flag warnings issued by the National Weather Service for the project site location. Example activities that should be prohibited during red-flag warnings include welding and grinding outside of enclosed buildings during construction. 3. Require fire extinguishers to be on site during project construction. Fire extinguishers shall be maintained to function according to manufacturer specifications. Construction personnel shall receive training on the proper methods of using a fire extinguisher. 4. Adequate fire protection infrastructure shall be available during construction. Examples include, but are not limited to, accessible water supply for firefighting, fire-resistant barriers, and a temporary standpipe system. 5. Firebreaks as necessary to prevent a fire on the premises from spreading to adjacent brush or grass covered areas. For future development under the proposed Project in a VHFHSZ where the BFD has determined existing regulations are not adequate based on unusual site-specific, roadway-specific, or project-specific conditions, the future development project applicant shall include the following mitigation to reduce risk of loss, injury, or death from wildfire: 1. Provision of approved, competent fire safety officers or advisors, as deemed by BFD, to act as fire guards or firewatchers to patrol the area when construction activities such as clearing of the land, erection of buildings, construction of roads, utility lines are taking place.	Less than significant with mitigation
Impact W-3. Future development projects within the proposed Specific Plan Area, which is located in or near State Responsibility Areas (SRAs) or lands classified as VHFHSZs, would not require the installation or maintenance of associated infrastructure, such as roads, fuel breaks, emergency water sources, power lines or other utilities, that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Impacts would be less than significant.	None required	Less than significant
Impact W-4. Future development projects within the proposed Specific Plan Area, which is located in or near SRAs or lands classified as VHFHSZs, would not expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be less than significant.	None required	Less than significant

Table ES-2 Effects Found Not to be Significant Conclusions Summary

Threshold	Impact Conclusion
Aesthetics	
Threshold 1. Would the project have a substantial adverse effect on a scenic vista?	Less than significant
Threshold 2. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and historic buildings within a state scenic highway?	No impact
Threshold 3. Would the project in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than significant
Agriculture and Forestry	
Threshold 1. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No impact
Threshold 2. Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?	No impact
Threshold 3. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No impact
Threshold 4. Would the project result in the loss of forest land or conversion of forest land to non-forest use?	No impact
Threshold 5. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	No impact
Air Quality	
Threshold 4. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less than significant
Biological Resources	
Threshold 2. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Less than significant
Threshold 3. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less than significant
Threshold 4. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less than significant
Threshold 6. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Less than significant
Geology and Soils	
Threshold 1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	Less than significant
Threshold 4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?	No impact

Threshold	Impact Conclusion
Threshold 8. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	No impact
Hazards and Hazardous Materials	
Threshold 1. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than significant
Threshold 5. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	Less than significant
Hydrology and Water Quality	
Threshold 1. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than significant
Threshold 3.i. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?	Less than significant
Threshold 3.ii. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	Less than significant
Threshold 3.iii. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	Less than significant
Threshold 3.iv. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?	Less than significant
Threshold 4. Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less than significant
Land Use and Planning	
Threshold 1. Would the project physically divide an established community?	No impact
Mineral Resources	
Threshold 1. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	No impact
Threshold 2. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	No impact
Noise	
Threshold 3. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the proposed Project expose people residing or working in the Plan Area to excessive noise levels?	No impact
Population and Housing	
Threshold 2. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less than significant
Recreation	
Threshold 2. Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less than significant

Threshold	Impact Conclusion
Transportation	
Threshold 1. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less than significant
Threshold 3. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than significant
Threshold 4. Would the project result in inadequate emergency access?	Less than significant
Utilities and Service Systems	
Threshold 5. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less than significant

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1 Introduction

This document is a Draft Program Environmental Impact Report (hereinafter referred to as "EIR") under the California Environmental Quality Act (CEQA) for the proposed updates to the 1991 Burbank Media District Specific Plan (hereafter referred to as "proposed Project"), which would apply to the approximately 544-acre area within the proposed Project boundary (hereafter referred to as "Specific Plan Area").

This section discusses (1) the proposed Project and EIR background; (2) the legal basis for preparing an EIR; (3) the scope and content of the EIR; (4) the lead, responsible, and trustee agencies; and (5) the environmental review process required under CEQA. The proposed Project is described in detail in Section 2, *Project Description*.

1.1 Environmental Impact Report Background

The City of Burbank ("City") distributed a Notice of Preparation (NOP) of the EIR for a 30-day agency and public review period that started on November 1, 2023, and ended on November 30, 2023. In addition, the City held an EIR Scoping Meeting on the evening of November 16, 2023. The meeting provided information about the proposed Project to members of public agencies, interested stakeholders, and residents/community members. The meeting was in Room 104 of the City's Community Services Building located at 150 North Third Street. The City received letters from one agency and one tribal entity in response to the NOP during the public review period. There were also verbal comments received during the EIR Scoping Meeting and five (5) written comments from the public. The NOP is presented in Appendix A of this EIR along with the NOP responses received. Table 1-1 summarizes the content of the letters and verbal comments and where the issues raised are addressed in the EIR.

Table 1-1 NOP Comments and EIR Response

Commenter	Comment/Request	Where Issue Is Addressed in Draft DEIR
Los Angeles County Metropolitan Transportation Authority (Metro)	Recommends the City include updated information on existing and planned transit services and facilities within the Specific Plan Area and to utilize Metro's NextGen Bus Plan to determine the location of high-frequency bus stops within the Specific Plan Area.	Comments are addressed in Section 4.15, *Transportation*.
	Recommends analysis of potential impacts on Metro bus stops and service within the Specific Plan Area to consider inclusion for the future North Hollywood to Pasadena Bus Rapid Transit Project, as well as several key bus lines. Metro has identified the following potential synergies associated with transited-oriented development: ▪ The provision of various developments to improve pedestrian safety and comfort to access Metro Bus stops. ▪ Coordination with the Metro Bike Share program to explore potential Bike Share stations in the Specific Plan Area. ▪ Address First-/Last-Mile connections to transit and support these connections. ▪ Incorporation of transit-oriented, pedestrian-orientated parking provision strategies ▪ Inclusion of wayfinding signage for easier navigation.	
Gabrieleño Band of Mission Indians- Kizh Nation	Requests notification of future ground disturbance.	Individual projects in the Specific Plan Area that require a CEQA analysis will be required to comply with the Native American consultation process under Assembly Bill (AB) 52 (2014).
Bob Olsen	▪ Expresses concern for light/shadow analysis for new tall buildings, specifically in the areas along Pass Avenue and Olive Avenue. ▪ Requests consideration of the impact of the Specific Plan's ability to transfer development rights for greater building height and consideration of State laws that may allow developers to exceed development limits. ▪ Expresses concern for emergency response times and requests the EIR address not only overall traffic impacts but also rush hour impacts. ▪ Expresses concern for routine cycling on specific routes (Pass Avenue, Olive Avenue, Riverside Drive) and expresses the need for attention to cyclist safety, especially if traffic volumes increase. ▪ Identifies concerns with impacts to public transportation and requests the traffic study/EIR reference current usage rates. ▪ Stresses the importance of frequent, convenient, clean, safe, and easy-to-use public transit options.	Comments related to light/shadow analysis and building heights are addressed in Sections 4.1, *Aesthetics* and 4.10, *Land Use and Planning*. Comments related to transportation/traffic are addressed in Section 4.15, *Transportation*.

Commenter	Comment/Request	Where Issue Is Addressed in Draft DEIR
Carolyn Lawrence	Expresses concern about potential development at the location of the old Kinkos and highlights the need for a plan to accommodate delivery trucks and ride-sharing vehicles, such as Uber.	This comment relates to the contents of the proposed Project, not the contents of the EIR. Thus, this comment is beyond the purview of CEQA, and this comment is not further addressed in this EIR.
Emily Gabel-Luddy	▪ Requests clarification in the project description on the proposed boundary for the Specific Plan Area. ▪ Comment requests clarification on the Development Agreement properties for the Specific Plan Area and requests the EIR include discussion on the Development Agreement properties within the Specific Plan Area and assess the potential impacts of developing these sites. ▪ Expresses concern about the availability of public open space under the proposed Project. Requests the EIR address consistent with the City's existing standards for public open space. ▪ Requests the EIR discuss aging utilities, specifically water and wastewater infrastructure improvements. ▪ Expresses concern for public art, specifically illustrated utility boxes. ▪ Inquires how the EIR will determine transportation impacts on pedestrian facilities, bike facilities, and public transportation. ▪ Inquires about transportation-related studies scope for supporting the EIR document (specifically trip generation on Hollywood Way, Barham Boulevard, State Route (SR) 134, Alameda Avenue and Riverside Drive) ▪ Expresses concern for cumulative air quality impacts. ▪ Expresses concern for coordination with agencies managing Johnny Carson Park ▪ Requests the EIR consider and identify how the application of density bonuses and other State housing mandates will align with and adhere to the objective development standards for the proposed Project, preventing them from exceeding or eliminating these standards. ▪ Expresses concern that the "Increased Growth" alternative may induce more impacts and requests analysis of a new alternative "Adaptive-Reuse Alternative"	The Project boundary and discussion on the Development Agreement or "Planned Development" properties are addressed in Section 2, *Project Description*. Comments related to recreation and public open space and consistency with the City's existing standards are addressed in Section 4.19, *Effects Found Not to be Significant,* Section 4.14, *Recreation* and Section 4.10, *Land Use and Planning*. Comments related to utilities and planned improvements are addressed in Section 4.17, *Utilities and Service Systems*. Cumulative air quality impacts are addressed in Section 4.2, *Air Quality* and Section 4.5, *Greenhouse Gas Emissions*. Comments related to traffic and transportation concerns are addressed in Section 4.15, *Transportation* and the supporting technical analyses are found in Appendix D, *Technical Review of Modeling and VMT Methodology*, and Appendix H, *Non-CEQA Transportation Impact Analysis*. Comments related to the application of density bonuses are discussed in Section 2, *Project Description* and Section 4.10, *Land Use and Planning*. Comments related to the Alternatives analysis are discussed in Section 6, *Alternatives*.

Commenter	Comment/Request	Where Issue Is Addressed in Draft DEIR
Julie D'Angelo	▪ Comment raises concerns about traffic issues in the area (along the north side of the Media District, near Alameda Avenue, Olive Avenue, Hollywood Way, and Buena Vista Street), citing intersections already rated poorly for traffic. ▪ Comment emphasizes Hollywood Way being the official route to the airport and requests the EIR analyze collective ways to ease traffic patterns in the area.	Comments related to traffic and transportation are addressed in Section 4.15, *Transportation*.
Steve Storozum	▪ Comment seeks clarification on whether the EIR will assess traffic impacts on neighboring sections of Magnolia Park. The comment inquires if the Project will set a housing threshold in the Media District beyond which road improvements in Magnolia Park must be funded. ▪ Inquiries if the EIR considers the impact of potentially increased traffic on SR-134, citing concerns about longer backups, slower traffic, increased air pollution, hazardous driving conditions, and the impact on neighboring freeways. ▪ Expresses concern about a potential ripple effect on the freeway that may be difficult to mitigate due to physical limitations and associated costs. ▪ Suggests that the EIR assess recreation opportunities within the Media District and consider whether more parkland availability is needed. Proposes the feasibility of capping SR-134 between the Olive Avenue overpass and Bob Hope Drive to create a new park, citing a similar park in La Canada Flintridge as a potential model. ▪ Expresses concern that potential environmental impacts will not be evenly spread across the entire Specific Plan Area (air quality and utilities).	Comments related to traffic and transportation concerns are addressed in Section 4.15, *Transportation*. Comments related to recreation are addressed in Section 4.14, *Recreation*. Comments related to the impacts of cumulative development are addressed in each section under “Cumulative Impacts.” Comments related to air quality and utilities are addressed in Section 4.2, *Air Quality* and Section 4.17, *Utilities and Service Systems*.

1.2 Purpose and Legal Authority

The proposed Project requires the discretionary approval of the Burbank City Council; therefore, the proposed Project is subject to the environmental review requirements of CEQA. In accordance with Section 15121 of the *CEQA Guidelines* (California Code of Regulations, Title 14), the purpose of this EIR is to serve as an informational document that:

> "...will inform public agency decision makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project."

This EIR has been prepared as a Program EIR pursuant to Section 15168 of the *CEQA Guidelines*. A program EIR is appropriate for a series of actions that can be characterized as one large project and are related in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program. Among other benefits, a program EIR can ensure consideration of cumulative impacts and allow for consideration of broader policy alternatives and mitigation measures at an early time when there is more flexibility to deal with basic problems or cumulative impacts.

Program EIRs may also assist during environmental review of later activities, such as the development of the opportunity sites identified in the proposed Project. Although approval of the proposed Project does not constitute a commitment to any specific development project, it is anticipated that this EIR may allow for streamlining of the environmental review process for future site-specific projects. The City will make use of existing streamlining provided by CEQA, emerging streamlining techniques, such as those related to implementation of the Southern California Association of Governments (SCAG) Sustainable Communities Strategy (Public Resources Code [PRC] Section 21155), and other streamlining techniques that may become available in the future.

The City has invested substantial resources in the proposed Project and this EIR and wishes to promote fiscally prudent use of this EIR, once it is certified, to accommodate development consistent with the proposed Project.

Tiering refers to a multilevel approach to preparing environmental documents set forth in PRC Section 21083.3 and State CEQA Guidelines Section 15152. The analysis in this Program EIR is considered the first tier of environmental review upon which future, project-specific CEQA documents can build. Environmental analysis for future projects consistent with the proposed Project can be streamlined to allow subsequent documents to focus on new or site-specific impacts (*CEQA Guidelines* Section 15168[d]).

PRC Section 21083.3 allows a lead agency to narrow the focus of project level analysis to effects upon the environment, which are peculiar to the parcel or project (PRC Section 21083.3(a)). The PRC also limits the effects that can be considered peculiar in project-level analysis under the Program EIR. Section 15152 of the *CEQA Guidelines* provides that where a first-tier EIR has "adequately addressed" the subject of cumulative impacts, such impacts need not be revisited in second- and/or third-tier documents. According to Section 15152(f)(3), significant effects identified in a first-tier EIR are adequately addressed, for purposes of later approvals, if the lead agency determines that such effects have been either:

> "mitigated or avoided as a result of the prior [EIR] and findings adopted in connection with that prior [EIR]"; or

> "examined at a sufficient level of detail in the prior [EIR] to enable those effects to be mitigated or avoided by site-specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project."

The PRC provides streamlining coverage to the City of Burbank and other public agencies that have authority to implement the proposed Project. Public agencies can use uniformly applied policies or standards to mitigate effects of future projects, avoiding the need to analyze these effects, unless new information arises that changes the impact analysis (PRC Section 21083.3 (d)). For this reason, this EIR includes references to proposed Project policies and implementation programs, where appropriate, to address environmental impacts. Future CEQA documents can reference the same policies and programs, where appropriate, to demonstrate less-than-significant impacts.

The City acknowledges and intends to make best use of the advantages to the programmatic approach to environmental analysis and reporting in this EIR. As noted in *CEQA Guidelines* Section 15168(b):

> "Use of a program EIR can provide the following advantages. The program EIR can:
>
> (1) Provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action;
>
> (2) Ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis;
>
> (3) Avoid duplicative reconsideration of basic policy considerations;
>
> (4) Allow the Lead Agency to consider broad policy alternatives and programwide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts; and
>
> (5) Allow reduction in paperwork.

The required level of specificity for an EIR in connection with a project such as the proposed Project corresponds to the degree of specificity involved in the underlying project. As stated in Section 15146 of the *CEQA Guidelines*:

> "An EIR on a project such as the adoption or amendment of a comprehensive zoning ordinance or a local general plan should focus on the secondary effects that can be expected to follow from the adoption or amendment, but the EIR need not be as detailed as an EIR on the specific construction projects that might follow."

As a Program EIR, this document focuses on the overall effect of the proposed Project. The analyses in this EIR do not examine the effects of site-specific projects that may occur within the overall umbrella of this program in the future. The nature of specific plans is such that many proposed policies are intended to be general, with details to be worked out during implementation. As a result, many of the impacts and mitigation measures in this EIR can be described only in general or qualitative terms. This EIR does, however, quantify impacts related to transportation, air quality (including a health risk assessment), GHG emissions, noise, water supply, and other topics, making reasonable assumptions as to the amount, type, and character of land use change anticipated with implementation of the proposed Project.

This EIR serves as an informational document for the public and City of Burbank. The process will include public hearings before the Planning Commission and the City Council to consider certification of a Final EIR and approval of the proposed Project.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. Section 15151 of the *CEQA Guidelines* provides the standard of adequacy on which this document is based and states the following:

> *"*An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure."

1.3 Scope and Content

This EIR addresses impacts on environmental factors identified within the *CEQA Guidelines* Appendix G Checklist to be potentially significant. Specifically, this EIR analyzes the proposed Project's impacts on the following issue areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Section 4.19, *Effects Found Not to be Significant,* briefly describes possible impacts that were determined not to be significant and were, therefore, not discussed in detail within the environmental impact analysis. Section 4.19, *Effects Found Not to be Significant,* includes impacts within the following environmental checklist items from Appendix G of the *CEQA Guidelines:*

- Aesthetics
- Agriculture and Forestry
- Air Quality
- Biological Resources
- Geology/Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Recreation
- Transportation
- Utilities and Service Systems

Within this EIR, references are made to pertinent City policies and guidelines, certified EIRs and adopted CEQA documents, and other background documents. A full reference list is contained in Section 7, *References and Preparers*.

The alternatives section of the EIR (Section 6) was prepared in accordance with Section 15126.6 of the *CEQA Guidelines* and focuses on alternatives that could avoid or substantially lessen the significant adverse effects associated with the proposed project while feasibly attaining most of the basic project objectives. In addition, the alternatives section identifies the "environmentally superior" alternative among the alternatives assessed. The alternatives evaluated include the Increased Growth Alternative and the CEQA-required "No Project" Alternative.

1.4 Lead, Responsible, and Trustee Agencies

The *CEQA Guidelines* define lead, responsible, and trustee agencies. In accordance with *CEQA Guidelines* Section 15050, the City of Burbank is the lead agency for the proposed Project because it holds principal responsibility for approving the proposed Project.

A responsible agency refers to a public agency other than the lead agency that has discretionary authority to carry out or approve a project. There are no responsible agencies for the proposed Project. Although no other agencies have direct approval authority over the proposed Project, several other agencies potentially have approval authority over individual developments that could be reasonably anticipated in the future under the proposed update to the Media District Specific Plan. These agencies include, but are not limited to, the California Department of Transportation (Caltrans), the California Department of Fish and Wildlife (CDFW), the South Coast Air Quality Management District (SCAQMD), the Southern California Association of Governments (SCAG), and the Los Angeles Regional Water Quality Control Board (LARWQCB). The EIR will also be submitted to these agencies for review and comment.

A trustee agency is a State agency having jurisdiction by law over natural resources that are held in trust for the people of California, and which may be affected by a project (*CEQA Guidelines* Section 15386). There are no trustee agencies for the EIR itself. As a programmatic document, implementation of the proposed Project would not directly cause development in areas where trustee agencies mentioned in *CEQA Guidelines* Section 15386 have jurisdiction.

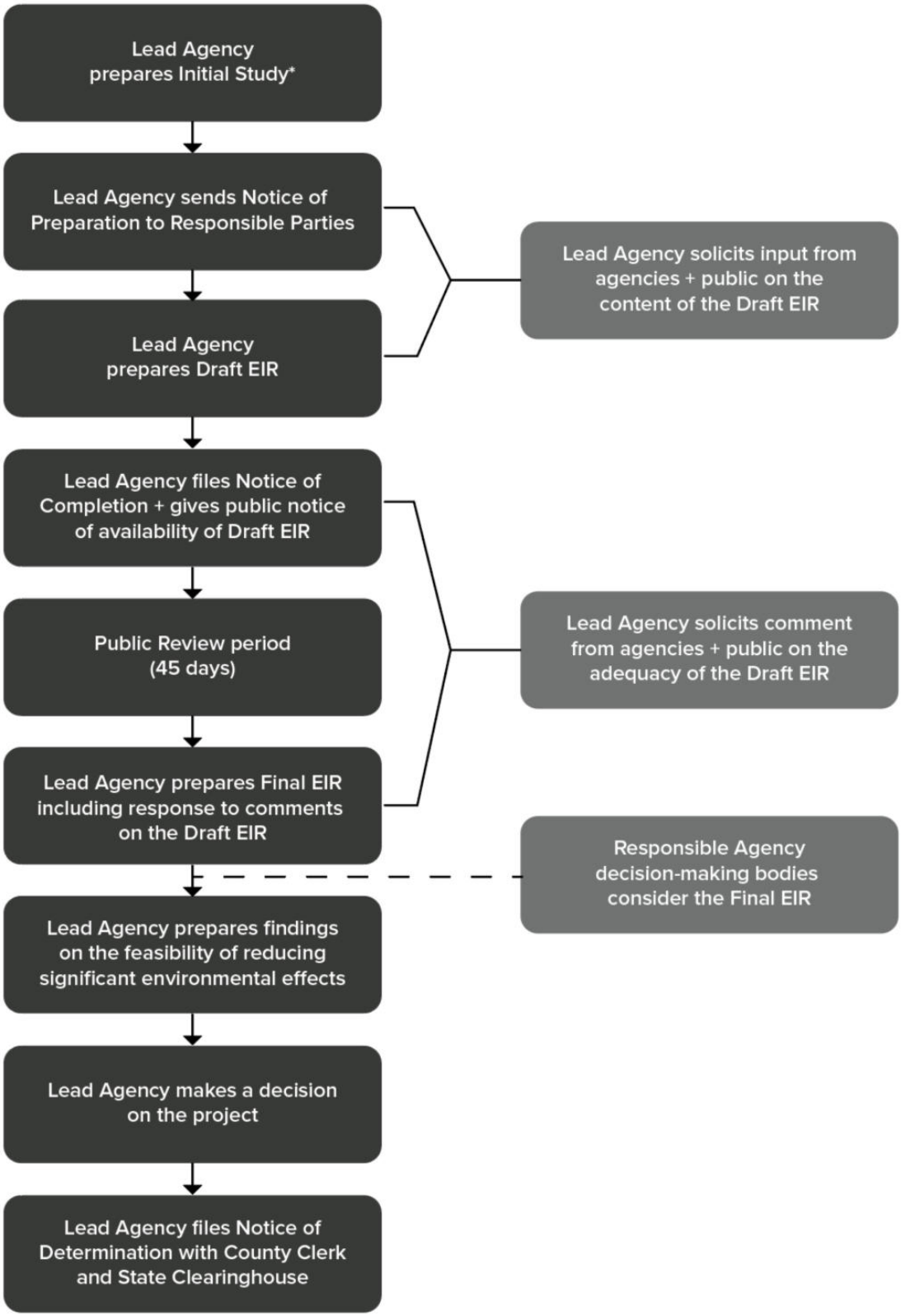
1.5 Environmental Review Process

The environmental impact review process, as required under CEQA, is summarized below and illustrated in Figure 1-1. The steps are presented in sequential order.

1. **NOP and Initial Study.** During preliminary review of the proposed Project, the City, as the lead agency, determined that an EIR was the appropriate level of environmental review and did not prepare an Initial Study (*CEQA Guidelines* Sections 15060(d) and 15063(a)). A NOP soliciting input on the EIR scope was filed with the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; PRC Section 21092.2). The NOP was posted in the Los Angeles County Clerk's office for 30 days. All environmental issues found to result in a less than significant impact are addressed in Section 4.19, *Effects Found Not to be Significant*.
2. **Draft EIR Prepared.** The Draft EIR must contain a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, energy, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.

3. **Notice of Completion (NOC).** The lead agency must file an NOC with the State Clearinghouse when it completes a Draft EIR and prepare a public Notice of Availability (NOA) of a Draft EIR. The lead agency must place the NOC in the County Clerk's office for 30 days (PRC Section 21092.3) and send a copy of the NOC to anyone requesting it (PRC Section 21092.2). Additionally, the NOA of a Draft EIR must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; c) direct mailing to owners and occupants of contiguous properties (*CEQA Guidelines* Section 15087); and d) posting on the City's website per PRC 21092.2(d). The lead agency must solicit input from other agencies and the public and respond in writing to comments concerning significant environmental issues (PRC Sections 21091(d), and 21153, *CEQA Guidelines* Section 15088[a]). The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review by state agencies, the public review period must be 45 days unless the State Clearinghouse approves a shorter period (*CEQA Guidelines* Section 15105). As an update to a specific plan, the proposed Project is of areawide significance, which also requires a review period of at least 45 days (PRC Section 21091).
4. **Final EIR.** A Final EIR must include a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting; and d) City responses to comments.
5. **Certification of Final EIR.** Prior to making a decision on a proposed project, the lead agency must certify that: a) the Final EIR has been completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; c) the decision-making body reviewed and considered the information in the Final EIR prior to approving a project; and (d) the final EIR reflects the lead agency's independent judgment and analysis (*CEQA Guidelines* Section 15090).
6. **Lead Agency Project Decision.** The lead agency may a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental effects, if the proper findings and a statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations**. For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that either: a) the project has been changed to avoid or substantially lessen the significant environmental effect; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, legal, social, technological, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, legal, technological, or other benefits supporting the agency's decision.
8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on changes that have been incorporated into the project to avoid or substantially lessen the significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects.
9. **Notice of Determination (NOD).** The lead agency must file an NOD after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094). The lead agency must post the NOD on the City's website (PRC 21092.2(d)). The lead agency must also file the NOD with the County Clerk and State Clearinghouse within five days of the lead agency's approval of the project. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (PRC Section 21167[c]).

Figure 1-1 Environmental Review Process



* The City determined an EIR was required for the proposed project; therefore, an Initial Study was not prepared in accordance with CEQA Guidelines Section 15063(a).

2 Project Description

The following subsections provide a summary of the background and description of the proposed update to the Burbank Media District Specific Plan (hereafter referred to as "proposed Project"), as required by State *CEQA Guidelines* Section 15124.

2.1 Project Applicant

City of Burbank - Community Development Department: Planning Division
150 North Third Street
Burbank, California 91502

2.2 Lead Agency Contact Person

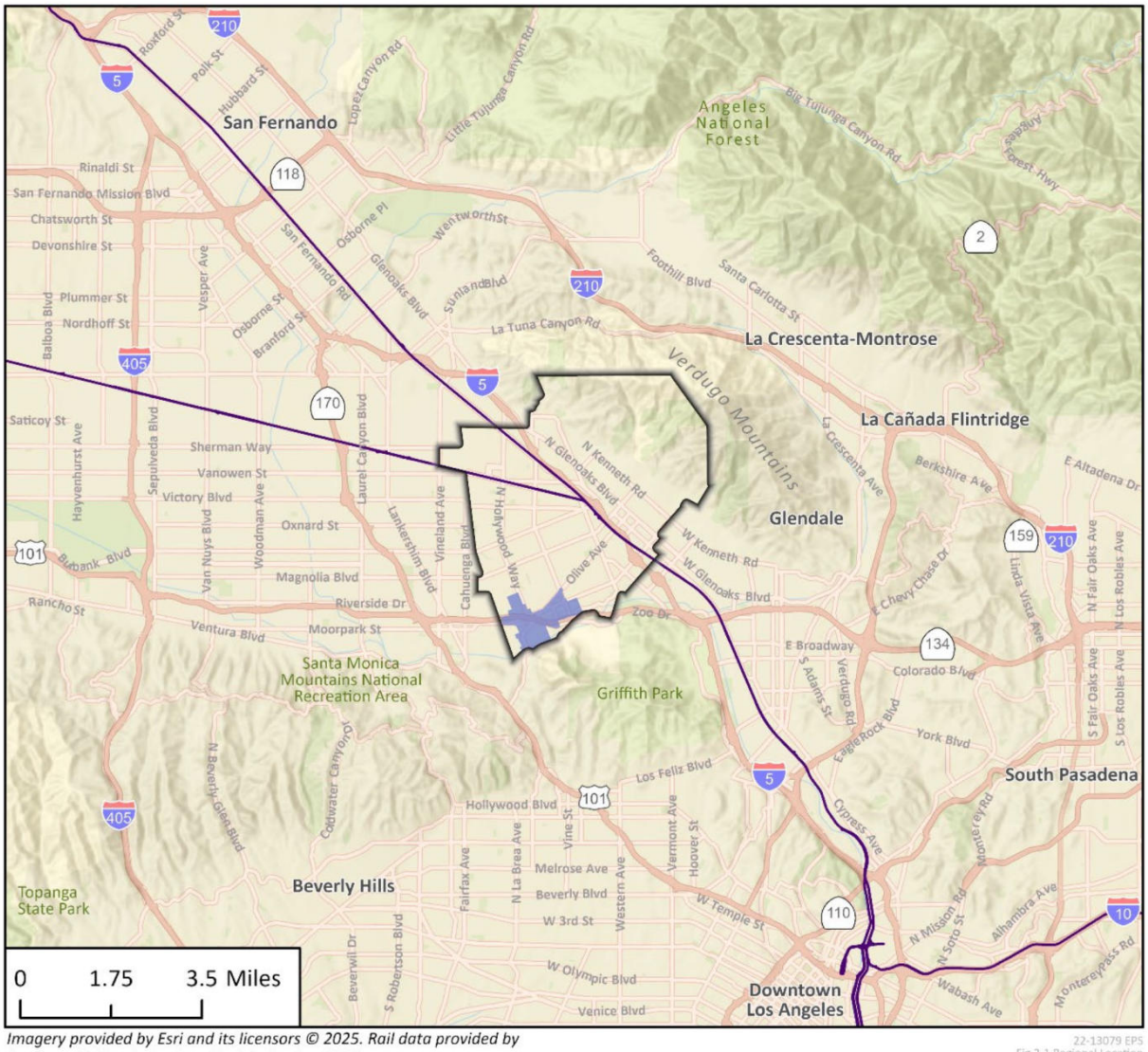
Amanda Landry, AICP, Principal Planner
City of Burbank
Community Development Department
150 North Third Street
Burbank, California 91502
818-238-5250

2.3 Project Location

The City of Burbank (hereafter referred to as "City" or "Burbank") encompasses 17.1 square miles and is located in the central portion of Los Angeles County, approximately 12 miles northwest of Downtown Los Angeles, as shown in Figure 2-1. The City is generally bounded by the Verdugo Mountains to the northeast, the City of Glendale to the east, and the City of Los Angeles to the south and west. The City of Burbank is bisected by Interstate 5 (I-5) and the Metrolink commuter rail right-of-way.

The Burbank Media District is located on the southwestern edge of the City and features several major employers and accessible amenities. The proposed Project area is approximately 544-acre area within the Specific Plan boundary (hereafter referred to as "Specific Plan Area"), as shown in Figure 2-2. The Specific Plan Area is generally bounded by the Magnolia Park residential neighborhood to the north, South Keystone Street and residential neighborhoods to the east, the Los Angeles River to the south, and the Toluca Lake and Toluca Woods residential neighborhoods in the City of Los Angeles to the west. The 544-acre Specific Plan Area is surrounded by urbanized areas with a mix of land uses, including residential, commercial, media studios industrial, institutional, and open space. The Specific Plan Area is also in close proximity to local and regional destinations and assets, including the Hollywood Burbank Airport, Universal City and Universal Studios, Hollywood, and Downtown Los Angeles. The Specific Plan Area is bisected by State Route 134 (SR-134) and West Olive Avenue. Figure 2-1 and Figure 2-2 on the following pages illustrate the location of the Specific Plan Area in a regional and local context, respectively.

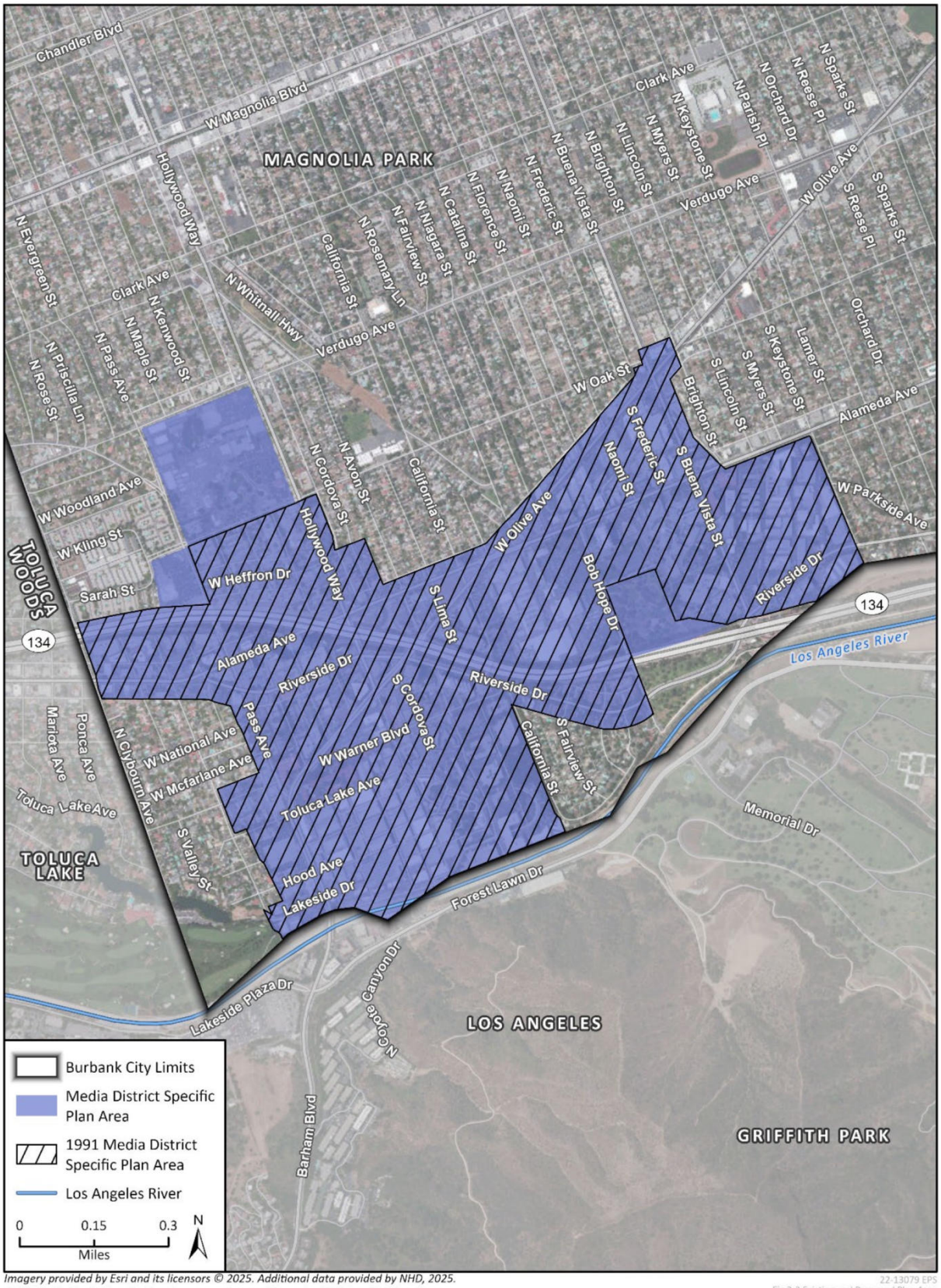
Figure 2-1 Regional Location



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Fig 2-1 Regional Location

Figure 2-2 Existing and Proposed Specific Plan Area



Imagery provided by Esri and its licensors © 2025. Additional data provided by NHD, 2025.
1991 Media District Specific Plan Area georeferenced from the 1991 Specific Plan document.

22-13079 EPS
Fig 2-2 Existing and Proposed Plan Area

2.4 Existing Specific Plan Area Characteristics

The Specific Plan Area is located on the southwestern edge of the City and features several major employers, including media and entertainment companies such as the Walt Disney Company, Warner Bros. Discovery, and Burbank Studios. The Specific Plan Area can be accessible via SR-134 freeway, a few major arterial streets (ex. Hollywood Way, West Olive Avenue, and West Alameda Avenue), and public transit. A total of five bus routes serve the Specific Plan Area and primarily run along Olive Avenue, Buena Vista Street, Alameda Avenue, Riverside Avenue, and North Hollywood Way.

The Specific Plan Area encompasses a mix of commercial, office, residential, medical, educational, and open space uses. Development patterns within the Specific Plan Area are compact and highly developed with pedestrian-friendly sections of Riverside Drive and areas north of Alameda Avenue, which include a walkable street network with shorter blocks, narrower streets lined with trees, and more human scale buildings. The majority of the residential uses within the Specific Plan Area are located north of Alameda Avenue, between SR-134 and the former Warner Bros. Ranch Facilities, now referred to as the "Ranch Lot." Most of the parcels located south of Alameda Avenue are dedicated to commercial and office uses. Many neighborhood-serving businesses, such as convenience stores, restaurants, barber shops, and gas stations, among others, are located along West Olive Avenue, which serves as the Specific Plan Area's main commercial corridor. Entertainment companies and offices line West Olive Avenue, and Planned Developments with large television and film studio campuses are located adjacent to the commercial areas. Due to the nature of the Planned Development sites, public access on these sites is generally restricted to authorized studio tours.

The Specific Plan Area also includes healthcare, recreation, and educational facilities that serve the local community. The Providence Saint Joseph Medical Center, located on the west end, provides comprehensive medical care and support services to the City and the greater region. Adjacent to the medical center is Providence High School and Johnny Carson Park, which provides open space facilities and recreational programming.

2.5 Project Characteristics

2.5.1 Specific Plan Update Summary

The City, in partnership with the Southern California Association of Governments (SCAG), proposes updates to the Media District Specific Plan. A specific plan is a policy document that will guide future development of a specific area in the city through specific land use goals/policies and development standards. The existing Specific Plan was adopted in 1991 for the purposes of creating a growth-control plan to ensure that all new development could be accommodated by infrastructure and public services and to preserve the character of the neighborhoods within the Specific Plan Area. The proposed updates to this Specific Plan are intended to focus on developing and implementing policies and programs to remove barriers to housing production, streamline the permitting process, and introduce objective design standards for new development within the Specific Plan Area.

The proposed Project includes the following chapters:

- **Chapter 1: Executive Summary.** Provides an overview of the proposed Project and provides direction on how to use the plan document.
- **Chapter 2: Introduction.** Describes the purpose, authority, planning context, relevant City adopted plans and policies, and environmental review for the proposed Project.

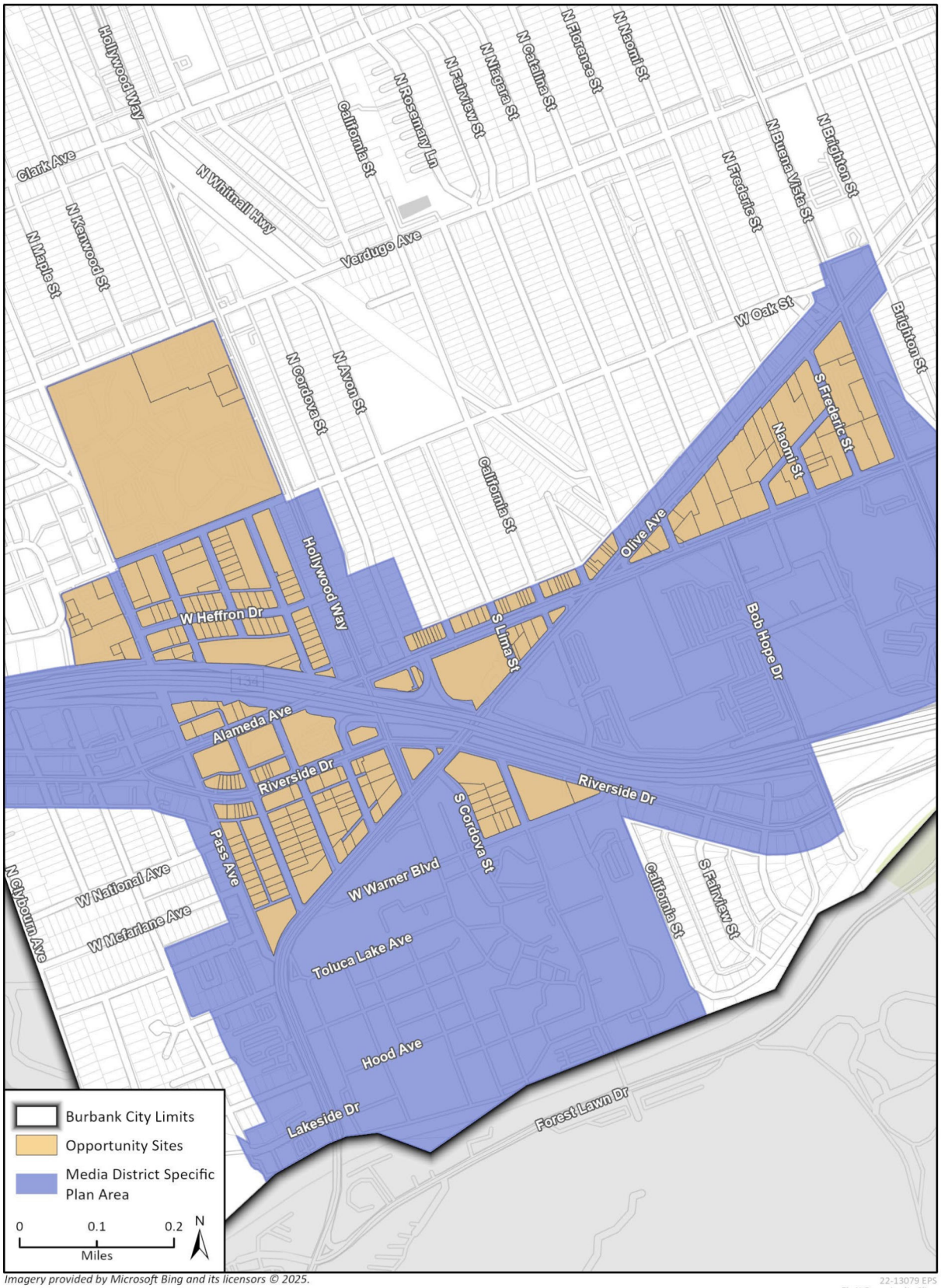
- **Chapter 3: Media District Profile**. Covers the existing Media District planning area, demographics, land use, and market profile.
- **Chapter 4: Community Engagement.** Summarizes the outreach efforts involved in the development of the proposed Project.
- **Chapter 5: Vision and Overarching Goals.** States the purpose of updating the Specific Plan and provides overarching goals for planning the Specific Plan Area.
- **Chapter 6: Land Use & Zoning.** Provides information on allowable land uses and zoning designations within the Specific Plan Area.
- **Chapter 7: Development Standards.** Outlines the development standards for land use and zoning designations within the Specific Plan Area to accommodate for future development associated with the proposed Project.
- **Chapter 8: Mobility & Public Realm.** Summarizes the City's transportation vision and goals to support the Specific Plan Area.
- **Chapter 9: Infrastructure.** Describes the proposed Project's infrastructure goals and policies, along with the Specific Plan Area's existing and proposed infrastructure for potable water, recycled water, sewer, stormwater, energy, telecommunications, and solid waste.
- **Chapter 10: Implementation.** Addresses the actions and information needed to implement the vision and goals presented in the Specific Plan.
- **Chapter 11: Definitions.** Provides definitions for terms used throughout the proposed Project.

The proposed Project would establish updated objective development standards to facilitate the potential new development of up to 9,702 residential units and 3,986,207 square feet of commercial and general business development, and 400 hotel rooms. The development types anticipated would include medium density residential, high density residential, mixed-used residential, commercial developments, and up to 400 hotel rooms within Specific Plan Area's opportunity sites. The City identified groupings of underutilized sites within the Specific Plan Area as opportunities for infill and adaptive reuse. These sites are referred to as opportunity sites and would assist in meeting the City's goals of introducing affordable housing, promoting infill development, and catalyzing economic development in proximity to existing employment centers and envisioned transit centers and corridors.

Figure 2-3, Specific Plan Opportunity Sites, illustrates the areas where opportunity sites are identified within the Specific Plan Area. For the purposes of this Project, Opportunity Sites are those that were identified through a combination of public outreach and feasibility discussions as having the greatest potential to experience redevelopment. Under the proposed Project, 125 percent of allowed density could be applied to future development projects that qualify as transit oriented development or exceptional project based on City eligible criteria and process, including opportunity sites and 100 percent of allowed non-residential intensity would be applied to all opportunity sites. These allowances would aid in streamlining the full range of non-residential development options without the need for additional density bonuses or restrictions.

Approximately 212 acres within the boundaries Specific Plan Area are zoned as Planned Development with several multi-media studios and are subject to private development agreements. For informational purposes, the number of potential residential units within these areas has been assessed under the "Planned Development" designation. However, these units are not included in the projected development potential under the proposed Project update as these properties are

Figure 2-3 Specific Plan Opportunity Sites



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Additional data provided by SCAG, 2022.

22-13079 EPS
Fig X Opportunity Sites

regulated through individual development agreements and are not subject to the provisions of the proposed Project update.

2.5.2 Project Objectives

The proposed Project includes objectives, policies and actions that will help achieve the vision for the Media District, as established through the planning process. The objectives, policies and actions will help facilitate residential and commercial development along major transit corridors and surrounding transit stations, with development intensities mindful of residential neighborhoods, and enable transit-focused residential and commercial growth all while respecting the original plan's goals of ensuring that growth in the Specific Plan Area is considered in context with the surrounding low and medium density residential neighborhoods. The project objectives listed below detail how the proposed Project would help achieve the vision for the Burbank Media District:

Emphasize Contextual Development

- Develop people-focused streetscapes and buildings that are sensitive to the surrounding intensity and scale of surrounding development.
- Allow sufficient and balanced development opportunities for media, medical, and other commercial establishments within the Media District.
- Encourage higher development intensity in the center of the Media District and transition as it approaches existing low- and medium-scale residential areas.

Transit Oriented Growth

- Align and encourage residential and commercial growth near major transportation resources, including new transit stops, corridors, and with major mobility centers.
- Ensure that non-vehicular infrastructure and public service improvements are designed to accommodate the needs of all existing and future development.
- Encourage more pedestrian and bicycle use through added infrastructure.

Facilitate Streamlined Housing Production

- Establish practical and objective design standards based on community feedback and best practices to ensure neighborhood compatibility and development.
- Encourage affordable and workforce housing development in the center of the Media District.
- Establish policies that will facilitate the streamlined development of a variety of housing in the center of the Media District.

2.5.3 Proposed Land Use Plan

The intent of the proposed Project is to guide development in the Specific Plan Area in a way that is appropriate with pre-existing land uses, neighborhoods and infrastructure, and enhance the built environment through well designed buildings. To reflect that the Specific Plan should be a distinct and unified community with a clear vision, the Burbank2035 General Plan Land Use Map would be amended under the proposed Project to reflect just one land use designation for the Specific Plan Area, Media District Land Use, as shown in Figure 2-4.

Figure 2-4 Specific Plan Area Proposed Land Use Map



Media District Land Use

- Media District Land Use
- Burbank Media District
- City Boundary

The zoning designations and development standards provided in the proposed Project would facilitate infill development, transit use, tourism, and the revitalization of the Media District while enhancing commercial corridors that traverse the Specific Plan Area. The proposed Project promotes a mix of uses and residential densities to allow people to live near work, transit, businesses, and entertainment options, as well as school and health facilities located within the Specific Plan Area. Table 2-1 provides the characteristics and allowed uses of the proposed zoning designations under the proposed Project. Figure 2-5 shows the proposed zoning for the Specific Plan Area.

Table 2-1 Proposed Specific Plan Zoning Designations

Zoning Designation	Characteristics and Allowed Uses
Media District Limited Commercial (MDC-2)	The MDC-2 zone is intended to serve the retail and service needs of the Media District business community and the adjacent residential neighborhoods.
Media District General Business (MDC-3)	The MDC-3 zone is intended for general business establishments and other commercial uses.
Media District Commercial/Media Production (MDC-4)	The MDC-4 zone is intended for general business establishments, other commercial uses, and certain restricted media production activities.
Media District Industrial (MDM-1)	The MDM-1 zone is intended for motion picture, television, recording production, other media related activities, hospitals and medical-related uses and other restricted commercial/industrial uses compatible with these uses.
Media District Residential Medium Density Residential Density (MDR-3)	The MDR-3 zone is intended for medium density multifamily development, including rental and ownership options. This zone can act to buffer single family residential neighborhoods from higher density multifamily development. With limited exceptions as allowed through the Conditional Use Permit process, non-residential uses are generally not appropriate in the MDR-3 Zone.
Media District High Density Residential (MDR-4)	The MDR- 4 zone is intended for higher density multifamily development, including rental and ownership options. The zone is intended to accommodate a higher intensity of multifamily development. With limited exceptions as allowed through the Conditional Use Permit process, nonresidential uses are generally not appropriate in the MDR-4 zone.
Open Space (OS)	The OS zone is intended to preserve land for public open space, to provide a variety of outdoor recreational opportunities within the Media District. The purpose of the OS zone is to provide for land conservation, watershed areas, and recreational activities. The provision for additional open space for outdoor recreational opportunities through the dual use of existing facilities, such as land fill areas, water supply facilities, reservoirs, and utility easements, is also an open space land use objective.
Planned Development (PD)	Any existing PD zone in the Media District is subject to the approved project conditions of approval and development agreement, for the specific PD zone. All new proposed PDs in the Media District will be subject to the requirements and review process as codified in Burbank Municipal Code Division 9 (Development Agreements) and Division 10 (Planned Development) of Article 19 (Zoning Procedures and Amendments) of Title 10 (Zoning Regulations) and as amended. The Media District also includes Johnny Carson Park, which is zoned OS (Open Space).The dissolution of a PD will require the establishment of a new zoning designation and Density and Intensity allowances.

Approximately 9,702 residential units and 3,986,207 square feet of commercial and general business development, and 400 hotel rooms are projected under the proposed Project. Approximately 9,651 residential units are projected as opportunity sites, and approximately 572 residential units are projected as pipeline projects (projects that are pending entitlement approval), which are included in the residential unit projection, as shown in Table 2-2. The net development quantity is the number of

new units and non-residential square footage that would be allowed under the proposed Project that would be above what is allowed under the existing Specific Plan.

Table 2-2 Summary of Proposed Changes

Land Use	Net Quantity
Total Media District Residential Units	9.702
Residential Units for Media District Opportunity Sites Only	9,651
Residential Units for Media District Pipeline Projects Only	572
Non-Residential Square Footage	3,986,207

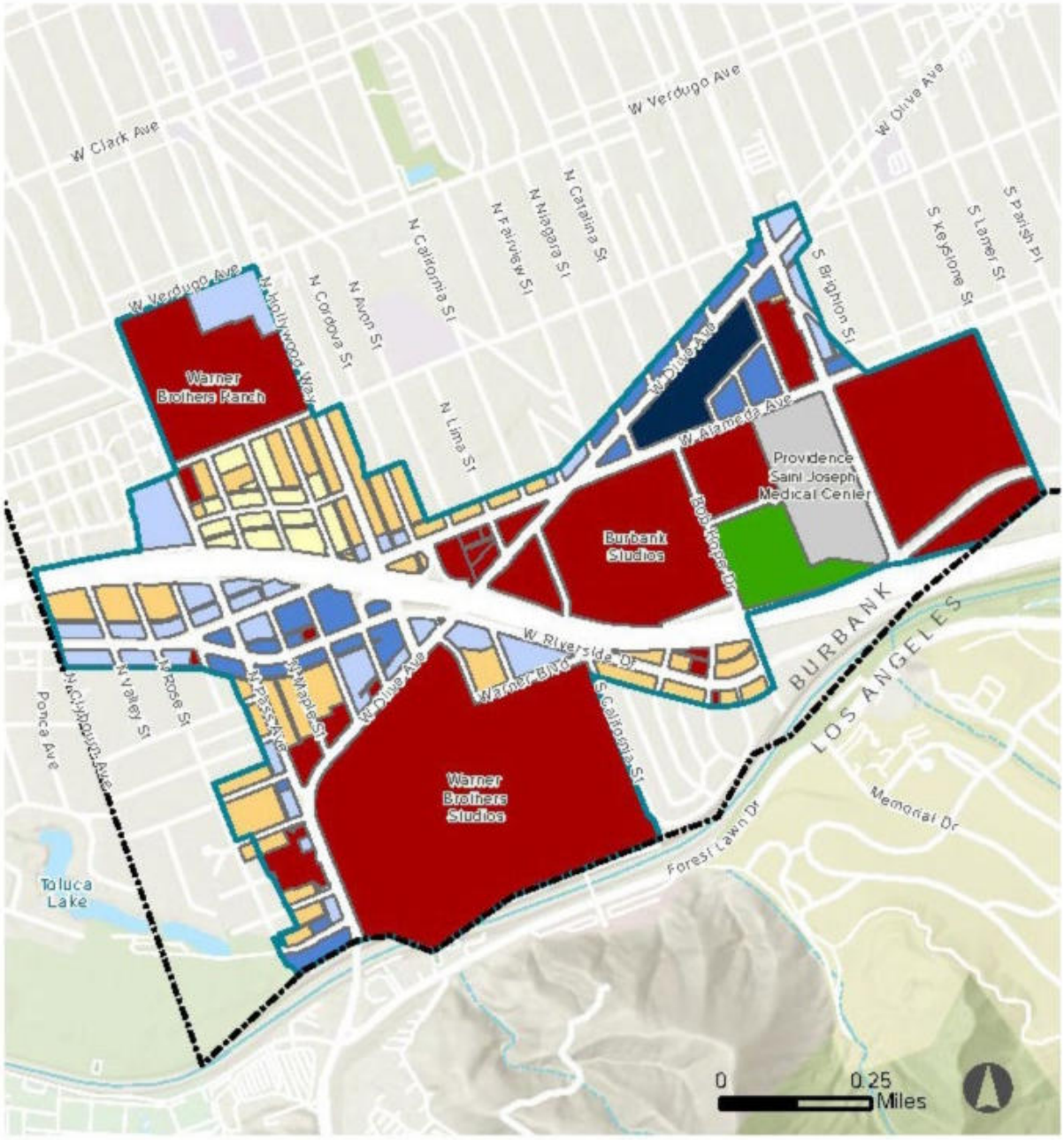
Housing development associated with the proposed Project would add an estimated 24,226 residents to the City (based on the average household size of 2.38 in Burbank), increasing Burbank's population from 105,603 (California Department of Finance [DOF] 2024) to 129,829 during the proposed Project's planning implementation period.

Figure 2-6 shows the designated 2050 Transit Priority Area (TPA) as designated by SCAG over the Specific Plan Area boundary and opportunity sites. The TPA is defined by SCAG as an area within one-half mile of a major transit stop that is existing or planned (SCAG 2025). As shown in Figure 2-6, nearly the entire Specific Plan Area is designated as a TPA due to the bus transit that serves the community.

2.5.4 Opportunity Sites

The proposed Project's Opportunity Sites were identified after evaluating the public feedback received during the initial outreach phase of the project and studying the existing land uses and forecasted economic trends. These sites are those that the project team identifying as having the most realistic potential to be redeveloped.

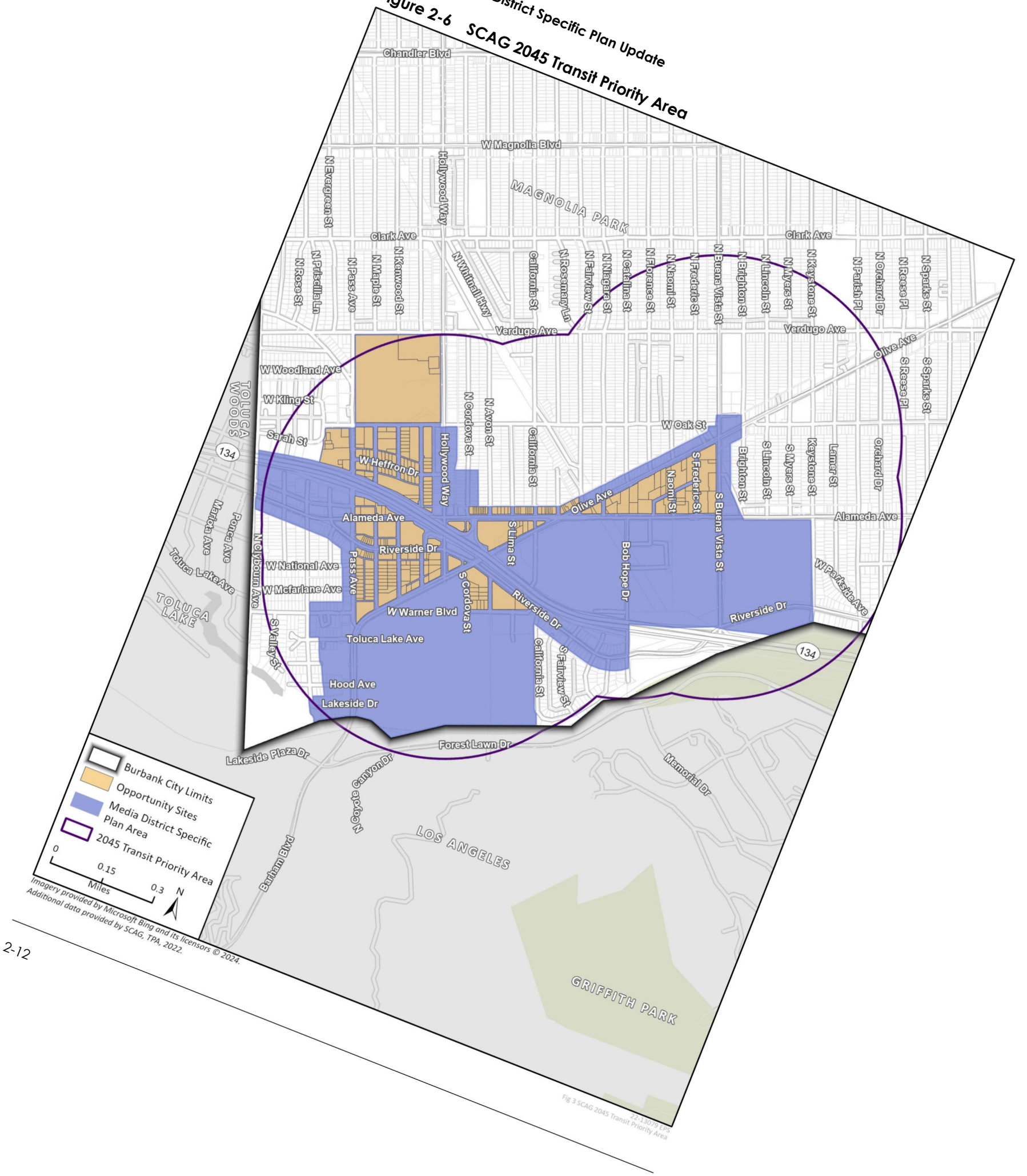
Figure 2-5 Specific Plan Area Proposed Zoning Map



Media District Zoning

- (MDC-2) Media District Limited Commercial
- (MDC-3) Media District General Business
- (MDC-4) Media District Commercial/Media Production
- (MDM-1) Media District Industrial
- (MDR-3) Media District Residential Multiple Low Density
- (MDR-4) Media District Residential Multiple Med Density
- (OS) Open Space
- (PD) Planned Development
- City Boundary
- Burbank Media District

Figure 2-6 SCAG 2045 Transit Priority Area



2.5.5 Policies and Programs

The proposed Project aims to develop implementing policies and programs to remove barriers to housing production, streamline the permitting process, and introduce objective design standards for new development within the Specific Plan Area. The proposed Project's objective design standards are summarized below. Chapter 8, *Mobility & Public Realm*, and Chapter 9, I*nfrastructure*, of the proposed Project contain proposed policies to implement the goals identified in Section 2.5.2, *Project Objectives*, above, these policies are described below.

Objective Development Standards

The proposed Project's objective development standards allow for higher density, floor area ratio, and building and structure heights within the Specific Plan Area. The proposed objective development standards also include design guidelines that support the character, economic development, and planned growth of the Specific Plan Area. Open space design and acreage and parking requirements are also defined in the proposed objective development standards.

Mobility & Public Realm Chapter Policies

The proposed mobility network for the Specific Plan Area is designed to serve all transportation modes and would consist of roadways and dedicated facilities that serve pedestrians, cyclists, transit, and private vehicles. The network has been developed in accordance with the City's General Plan, projects identified in the Bicycle Master Plan, recommendations from the Greenhouse Gas Reduction Plan and the Complete Our Streets Plan, and input from community members.

The mobility policies and supportive strategies are based on the Specific Plan Area's mobility goals that support reducing reliance on personal vehicles and increasing safety, access, comfort, and convenience of all modes of transportation. The proposed mobility infrastructure policies are listed below.

Mobility & Public Realm Policies

- **Policy 1.1:** Create a multimodal, active, engaged, human- oriented streetscape network, where the private automobile is not viewed as the only mode of travel.
- **Policy 2.1:** Support future development that creates greater access to alternate modes of transportation and therefore reduce reliance on personal vehicles by making walking, biking, and public transit more accessible, comfortable, safe, and convenient.
- **Policy 3.1:** Improve safety for all modes of transportation with an emphasis on the most vulnerable modes.
- **Policy 4.1:** Ensure efficient parking management in the Media District by implementing policies to regulate curb space effectively, protect on-street parking in residential neighborhoods, and explore strategies to maximize underutilized off-street parking.

Pedestrian Infrastructure Policies

- **Policy 1.0:** Increase access for people walking in the neighborhood.
- **Policy 2.0:** Provide attractive and comfortable infrastructure for people walking in the neighborhood.

- **Policy 3.0:** Maximize pedestrian safety while ensuring safe interaction between all modes of transportation.

Bicycle Infrastructure Policies

- **Policy 1.0:** Provide a bicycle network that connects major destinations, including commercial areas, employment centers, and residential neighborhoods.
- **Policy 2.0:** Eliminate first-mile/last-mile mobility gaps and barriers.
- **Policy 3.0:** Maximize bicycle safety including providing separation between bicyclists and motorists whenever feasible.

Transit Infrastructure Policies

- **Policy 1.0:** Enhance safety, accessibility, and cleanliness at transit stops and routes.
- **Policy 2.0:** Improve transit connections with local and regional destinations.
- **Policy 3.0:** Ensure transit is reliable and provides high quality service to destinations.
- **Policy 4.0:** The introduction of Bus Rapid Transit in the Media District will contribute to the creation of the transit center cited in the Burbank2035 General Plan Mobility Element Policy 4.3: "Improve and expand transit centers; create a new transit center in the Media District."

Motor Vehicle Infrastructure Policies

- **Policy 1.0:** Focus improvements within the City's existing rights-of-way.
- **Policy 2.0:** Ensure safe interaction between all modes of travel.
- **Policy 3.0:** Enhance access to destinations and availability of curb space and avoid diverting traffic to adjacent neighborhoods.

Parking Policies

- **Policy 7.1:** Effectively manage citywide parking to improve convenience while maximizing use at all times of the day.
- **Policy 7.2:** Design commercial and residential parking standards to limit new vehicle trips, incentivize transit use, and promote non- motorized transportation.
- **Policy 7.3:** Reconfigure or remove underutilized street parking when needed to accommodate safer bicycle travel, increase walkability, improve transit operation, or improve vehicle safety.

Infrastructure Policies

Public utility infrastructure policies outlined in the proposed Project provide clear expectations for developers regarding fees, assuring residents of the reliability of utility services, and equipping policymakers with the guidance needed to plan for and prioritize future infrastructure improvements. The following policies are based on the goal of providing high quality infrastructure to accommodate the growth allowed by the proposed Project.

Public Utility Infrastructure Policies

- **Policy 1.1:** Ensure that any new development in the Media District has adequate water, sewer, and drainage, in accordance Burbank Water and Power and the City's Public Works Department.
- **Policy 1.2:** Incorporate sustainable stormwater management features in new development and public improvements, including bio-swales, permeable pavers, rainwater collection systems, and other features to manage stormwater runoff.
- **Policy 1.3:** Ensure that new development utilizes recycled water for landscaping.
- **Policy 1.4:** Require new development to coordinate with the appropriate agency to provide electric and gas service to the proposed site consistent with local regulations and plants.

2.6 Required Approvals

The proposed Project would require a recommendation from the Planning Commission to the City Council, and would require the Planning Commission to consider and make a recommendation to the Burbank City Council to adopt the proposed Project policy document, Environmental Impact Report, and related Mitigation Monitoring and Reporting Program. The following discretionary approvals are required prior to the proposed Project becoming effective:

- Resolution of the City Council adopting the Specific Plan policy document
- Certification of this EIR prepared for the proposed Project
- General Plan Amendment to amend the land use designations in the Land Use Element to incorporate the proposed updates required by the proposed Media District Specific Plan
- Zone text amendment to Title 10 of the Burbank Municipal Code to incorporate by reference the objective development and design standards established in the proposed Project for zones within the Specific Plan Area

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3 Environmental Setting

This section provides a general overview of the environmental setting for the proposed Project by describing the physical environmental conditions as they existed at the time the Notice of Preparation was published in November 2023. In accordance with *CEQA Guidelines* Section 15125, "a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence" where necessary to provide the most accurate description of the existing conditions. More detailed descriptions of the environmental setting and baseline conditions for each environmental issue area can be found in Section 4, *Environmental Impact Analysis*, and any issue area that deviates from the 2023 baseline will be noted in the methodology.

3.1 Regional Setting

The Burbank Media District Specific Plan Area (hereafter referred to as "Specific Plan Area") is located approximately 12 miles northwest of the civic center of the City of Los Angeles. The Specific Plan Area is located on the southwestern edge of the City of Burbank (hereafter referred to as "City" or "Burbank") and is generally bounded by the Magnolia Park residential neighborhood to the north, South Keystone Street and residences to the east, the Los Angeles River to the south, and the Toluca Lake and Toluca Woods residential neighborhoods to the west. The approximately 544-acre Specific Plan Area consists of an urbanized setting and is occupied by a mix of land uses, including residential, commercial, institutional, open space, and media studios, including notable production companies, such as the Walt Disney Studios, Warner Bros. Studios, and Burbank Studios. Below, Figure 2-1 in Section 2, *Project Description,* and Figure 2-2, show the regional location of the Specific Plan Area and the boundaries of the Specific Plan Area in a more local context, respectively.

The Specific Plan Area consists of an existing street grid system of east-west and north-south roadways, including arterials, collectors, and local streets, that provide vehicular access throughout Burbank. State Route 134 bisects the Specific Plan Area. Other major roadways in the Specific Plan Area include West Olive Avenue, West Alameda Avenue, Pass Avenue, Hollywood Way, Buena Vista Street, and Riverside Drive. Interstate 5 is located approximately 1.5 miles east of the Specific Plan Area.

The regional climate is considered semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. Although air quality in the area has steadily improved in recent years, the Los Angeles region remains a nonattainment area for ozone (urban smog). The City is located approximately 13 miles inland from the coastline of the Pacific Ocean.

3.2 Specific Plan Area Setting

The Specific Plan Area is currently developed with a mix of uses. The Specific Plan Area consists of the following Burbank2035 General Plan land use designations: Medium and High Density Residential, Corridor Commercial, and Media District Commercial. Approximately 76 percent of the Specific Plan Area is dedicated to media-oriented and non-residential uses. Residential uses make up

approximately 16 percent of the Specific Plan Area, approximately 5 percent is parking, and approximately 3 percent is vacant and flex land.[1]

3.3 Cumulative Impacts

In addition to the specific direct and indirect impacts of individual projects, CEQA requires EIRs to consider potential cumulative impacts of the proposed Project. CEQA defines "cumulative impacts" as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (CEQA Guidelines Section 15355). Cumulative impacts are the combined changes in the environment that result from the incremental impact of development of a proposed project and other nearby projects. For example, wastewater conveyance and treatment impacts of two nearby projects may be less than significant when analyzed separately but could have a significant impact when analyzed together. The cumulative impact analyses allow an EIR to provide a reasonable forecast of future environmental conditions and can more accurately gauge the effects of a series of projects.

When a project's incremental effect is cumulatively considerable, CEQA requires cumulative impact analysis in EIRs to consider either a list of past, present, and probable future projects that may contribute to cumulative effects or a forecast of future development potential. Because the proposed Project is a specific plan update, cumulative impacts are treated somewhat differently than they would be for a project-specific development. Section 15130(b)(1)(B) of the *CEQA Guidelines* states that an adequate cumulative impact analysis can be based on "[a] summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect."

The entire Specific Plan Area is within the City of Burbank. The cumulative impacts analysis for this EIR is based on the Burbank2035 General Plan, adopted in February 2013. The State of California has mandated that more housing be produced locally, requiring Burbank to plan for 8,772 new residential units by 2029 The City Council has set an aspirational goal to introduce 12,000 new dwelling units citywide by the year 2035. The proposed Project would potentially introduce up to 9,702 dwelling units, which would not exceed the growth projections under the Burbank2035 General Plan or City Council goals.

The Specific Plan Area is located geographically in the southwestern portion of Burbank; however, cumulative development, as considered in this EIR, is generally spread throughout the City. Some cumulative impacts are not necessarily significant in relation to development that occurs farther from the Specific Plan Area. For example, noise impacts associated with the proposed Project are not likely to be detected in the northern part of Burbank but may result in localized cumulative impacts that may be detected in the adjacent residential areas in southwestern Burbank. Select cumulative impact discussions, such as noise, apply to smaller geographic area, while some cumulative impact discussions, such as air quality, apply to much larger geographic areas, such as the Los Angeles region and other areas within the South Coast Air Basin. As such, each issue area will identify the geographic extent of the cumulative impact analysis.

[1] Refer to Table 6-1: Land Use Area of the proposed Burbank Media District Specific Plan.

In addition to the proposed Project, the City is currently preparing the Downtown Transit Oriented Development (TOD) Specific Plan (an update and consolidation of the North San Fernando Boulevard Master Plan and the Burbank Center Plan), the Golden State Specific Plan (GSSP), and the Burbank Rancho Neighborhood Specific Plan[2]. The Downtown TOD Specific Plan would facilitate development of up to 9,944 residential units and 6,083,657 square feet of commercial and business development land uses in the Downtown TOD Specific Plan Area. The GSSP would facilitate development of up to 7,205 residential units and 3,149,623 square feet of commercial and business development land uses in the GSSP Area.

The estimated population and housing growth forecast for the 2021-2029 Housing Element Update was 10,456 housing units to account for the 2029 interpolated housing growth assumed under the Downtown Burbank TOD Specific Plan and GSSP along with the City's RHNA allocation. Housing and commercial development under each of these area plans is anticipated to occur over the approximately 10-year horizon period for each specific plan. Environmental issue areas that may result in impacts beyond the Specific Plan Area include Air Quality, Population and Housing, Transportation, and Utilities and Service Systems. As such, the cumulative analysis for these issue areas includes the potential cumulative impacts associated with development under the two other specific plans, along with the proposed Project's potential contribution to cumulative impacts.

[2] Preparation of the Burbank Rancho Neighborhood Specific Plan is in preliminary preparation stage at the time of preparation of this EIR and development numbers have not been estimated by the City. Section 15145 of the California Code of Regulations (CCR) states that "if, after thorough investigation, a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact." Therefore, the cumulative impacts related to the Burbank Rancho Neighborhood Specific Plan are not further analyzed throughout this EIR.

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4 Environmental Impact Analysis

This section discusses the possible environmental effects of the proposed Project for those issue areas that have been identified through the scoping processes and by the NOP responses as having the potential to experience significant effects. A "significant effect" is defined by *CEQA Guidelines* Section 15382 as:

> "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant."

The assessment of each issue area begins with a discussion of the environmental and regulatory settings related to the issue, which is followed by the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the "significance thresholds," which are those criteria adopted by the City, other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each potential impact of the proposed Project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

- **Significant and Unavoidable**. An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the proposed Project is approved (*CEQA Guidelines* Section 15093).
- **Less than Significant with Mitigation Incorporated**. An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the *CEQA Guidelines*.
- **Less than Significant**. An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact in each issue area section. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts including growth-inducing impacts and energy impacts associated with the proposed project in conjunction with other future development in the Specific Plan Area, as discussed in Section 3, *Environmental Setting*.

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4.1 Aesthetics

This section evaluates the potential environmental impacts related to aesthetics associated with the implementation of the proposed Project. Specifically, this section reviews the proposed Project's impact related to light and glare. Other thresholds of significance associated with scenic vistas, scenic resources within a state scenic highway, and the proposed Project's consistency with zoning and other regulations governing scenic quality are discussed in Section 4.19, *Effects Found Not to be Significant*; therefore, these issues are not studied further herein.

4.1.1 Environmental Setting

Visual resources are an important component of the quality of life of any community. As residents, workers, and/or visitors experience a place, their primary sensory interaction with that place is visual, and a wide variety of visual elements form the aesthetic character. These elements include scenic vistas, scenic resources, light and glare, and the visual character and quality of the area's topography, natural features, and urban form.

a. Visual Character of the Specific Plan Area

The Burbank Media District Specific Plan Area (hereafter referred to as "Specific Plan Area") is comprised of approximately 544 acres located in the City of Burbank (hereafter referred to as "City" or "Burbank"). The Specific Plan Area is in a densely urbanized setting occupied by a mix of commercial, open space, institutional, and medium and high-density residential uses, along with several notable production company studios such as the Walt Disney Company, Warner Bros. Discovery, and Burbank Studios that serve as the foundation for the Specific Plan Area's visual character.

According to the Burbank2035 General Plan EIR Technical Report, the Specific Plan Area contains several mid- and high-rise office and medical buildings with varying architectural styles, as well as single-story or two-story residential, commercial, and industrial properties. Some large office buildings in the Media District have well-landscaped entrance plazas. Others abut the sidewalk and provide no outdoor space. The interface between the Media District and adjacent single-family neighborhoods can be dramatic where single-story houses are juxtaposed to high-rise office towers. Walls and/or fences encircle the large, windowless sound stages within the studio properties and limit views from the street and sidewalk. Large-scale media supergraphics and murals on the sound stage walls are visible from the public roadways and studio gate entrances and contribute to the unique character of the Specific Plan Area (City of Burbank 2013).

In addition, the Specific Plan Area includes Johnny Carson Park, a 17.6-acre open space and recreation area featuring amenities, such as fitness equipment, picnic tables, a playground, stage, restrooms, little free library, and a walking trail (City of Burbank 2025). The park also hosts various cultural arts festivals and events that make it compatible with the entertainment and visual character of the Specific Plan Area.

b. Visual Character of Specific Plan Area Vicinity

The Specific Plan Area is bordered by the Magnolia Park neighborhood to the north and is bounded by South Keystone Street and residences to the east, the Los Angeles River to the south, and the Toluca Lake and Toluca Woods residential neighborhoods to the west. Historic commercial signs within the Specific Plan Area also contribute as scenic resources, such as the Bob's Big Boy and the

Lakeside Carwash signs (City of Burbank 2013;2021). Additionally, Griffith Park sits at the eastern end of the Santa Monica Mountains, just south of the Specific Plan Area.

Scenic resources in Burbank include public parks and open space, such as Wildwood Canyon Park, Stough Park, Buena Vista Park, and Brace Canyon Park. In addition, the architecture of historic structures, such as Burbank City Hall and the Portal of the Folded Wings Shrine to Aviation in Valhalla Memorial Park, are also considered scenic resources that represent aspects of the City's history. Burbank's residential, commercial, and industrial neighborhoods contain numerous examples of historic architectural styles, including Craftsman, Colonial, Mediterranean, Prairie, Googie, Art Deco, and Mission Revival.

c. Scenic Routes

The California Scenic Highway System and the County of Los Angeles Scenic Highways Element indicate that there are no existing or proposed County or State scenic highways located in the vicinity of the Specific Plan Area. The closest scenic highway is the southern segment of Angeles Crest Highway freeway, located over nine miles northeast of the Specific Plan Area (California Department of Transportation [Caltrans] 2025). The Specific Plan Area is not visible from this segment of the Angeles Crest Highway.

d. Viewsheds

Viewsheds refer to the visual qualities of a geographical area that are defined by the horizon, topography, and other natural features that give an area its visual boundary and context, or by development that has become a prominent visual component of the area. Public views are those available from vantage points that are publicly accessible, such as streets, freeways, parks, and vista points. These views are generally available to a greater number of people than are private views. Private views are those available from vantage points located on private property.

As identified in the Conservation and Open Space Element of the Burbank2035 General Plan, scenic vistas in Burbank are limited to the Verdugo Mountains and Santa Monica Mountains (City of Burbank 2013). The Verdugo Mountains, which includes Wildwood Park, Stough Canyon, and Skyline Drive Trail, are located approximately five miles northeast of the Specific Plan Area, and the Santa Monica Mountains are located directly south of and are visible from the Specific Plan Area.

e. Light and Glare

The Specific Plan Area is highly urbanized with existing sources of light and glare. Typical contributors to ambient light levels include both stationary and mobile sources. Stationary sources include exterior structure illumination, light spillover from interior lighting; illuminated signage such as neon signs; and lighting for outdoor uses such as streetlights, sports fields and courts, parking lot lighting.

The Specific Plan Area contains several existing sources of light and glare, such as streetlights along roadways and in parking lots, illuminated signs, lighted recreational facilities, landscape lighting, and light emitted from the interiors of residential and nonresidential buildings. Within the Specific Plan Area, high-rise office buildings and structures with glass, metal, and polished exterior or roofing materials, as well as lighting from entertainment studios contribute to localized sources of glare.

4.1.2 Regulatory Setting

This section describes the State, regional, and local laws, regulations, orders, and plans that are applicable to aesthetics and visual quality. Citywide policies on visual resource protection focus on maintaining and protecting significant visual resources, character, and aesthetics that define the City. No federal regulations related to visual resources apply to the proposed Project and Specific Plan Area.

a. State Regulations

Senate Bill 743

In September 2013, the Governor of California signed Senate Bill 743 (SB 743) into law. This bill streamlined CEQA review for projects located within transit priority areas (TPA). Pursuant to Public Resources Code [PRC] Section 21099[d][1], "[a]esthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a [TPA] shall not be considered significant impacts on the environment." PRC Section 21099(a) defines a "transit priority area" as an area within 0.5 mile of an existing or planned major transit stop. PRC Section 21064.3 defines a "major transit stop" as a site containing an existing rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 20 minutes[1] or less during the morning and afternoon peak commute periods. PRC Section 21099(a) defines an "employment center project" as "a project located on property zoned for commercial uses with a floor area ratio of no less than 0.75 and that is located within a transit priority area." According to PRC Section 21099(a), an "infill site" includes a lot located within an urban area that has been previously developed.

As shown in Figure 2-5 of the Project Description, the majority of the Specific Plan Area and opportunity sites are within the 2045 TPA, as designated by Southern California Association of Governments (SCAG). It is anticipated that the majority of reasonably foreseeable residential, mixed-use residential, and employment center developments associated with the proposed Project would occur on infill sites within a TPA, so aesthetic impacts of many future projects within the Specific Plan Area may not be considered significant, pursuant to PRC Section 21099(d).

State Scenic Highways

Caltrans defines a scenic highway as any freeway, highway, road, or other public right-of-way that traverses an area of exceptional scenic quality. Suitability for designation as a State scenic highway is based on vividness, intactness, and unity, as described in Caltrans Scenic Highway Guidelines (2008):

- Vividness is the extent to which the landscape is memorable. This is associated with the distinctiveness, diversity, and contrast of visual elements. A vivid landscape makes an immediate and lasting impression on the viewer.
- Intactness is the integrity of visual order in the landscape and the extent to which the natural landscape is free from visual intrusions (e.g., buildings, structures, equipment, and grading).
- Unity is the extent to which development is sensitive to and visually harmonious with the natural landscape.

[1] Assembly Bill 2553 revises the definition of "major transit stop" to increase the frequency of service interval to 20 minutes.

A State scenic highway changes from "eligible" to "officially designated" when the local jurisdiction adopts a scenic corridor protection program, applies to Caltrans for scenic highway approval, and receives notification from Caltrans that this highway has been designated as a Scenic Highway. As described above and shown in Figure 2-5, SCAG 2045 Transit Priority Area in Chapter 2, *Project Description*, there are no existing or proposed State scenic highways located in the vicinity of the Specific Plan Area.

b. City of Burbank Regulations

Burbank2035 General Plan

The Burbank2035 General Plan (General Plan) (adopted February 2013) is the City's long-range policy document that guides future developments and land use decision-making in Burbank. General Plan Elements relevant to aesthetics include: Land Use, Mobility, Open Space and Conservation, and Plan Realization. Additionally, the General Plan includes the Housing Element, which was most recently updated in September 2022 by the City and certified by the State in October 2022.

Land Use Element

Goals and policies of the Land Use Element seek to maintain a balance between small-town character, economic prosperity, and sustainability (City of Burbank Land Use Element 2013). The goals and policies applicable to the proposed Project, with respect to aesthetics, are presented below. The proposed Project's consistency with the Land Use Element, including the goals and policies listed below, is further discussed in Table 4.10-2 in Section 4.10, *Land Use and Planning,* of this Draft EIR.

Goal 1: Quality of Life

Policy 1.6 Adapt economically underused and decaying buildings, consistent with the character of surrounding districts and neighborhoods, to support new uses that can be more successful.

Policy 1.7 Ensure that building height and intensity near single-family residential neighborhoods is compatible with that permitted in the neighborhood. Use graduated height limits to allow increased height as distance from single-family properties increases.

Goal 3: Community Design and Character

Burbank's well-designed neighborhoods and buildings and enhanced streets and public spaces contribute to a strong sense of place and "small town" feeling reflective of the past.

Policy 3.2: Preserve unique neighborhoods and use specific plans to distinguish neighborhoods and districts by character and appearance and address physical and visual distinction, architecture, edge and entry treatment, landscape, streetscape, and other elements.

Policy 3.3: Maintain a healthy balance between Burbank's urban setting and its suburban roots by avoiding urban-scale residential densities and intensities in inappropriate locations, and recognizing advantages of denser development at appropriate locations.

Policy 3.4: Avoid abrupt changes in density, intensity, scale, and height and provide gradual transitions between different development types.

Policy 3.5: Ensure that architecture and site design are high quality, creative, complementary to Burbank's character, and compatible with surrounding development and public spaces.

Policy 3.6: Carefully regulate signs to ensure that their size and location are attractive, are appropriate for the site, and appropriately balance visibility needs with community character and aesthetics.

Policy 3.11: Carefully consider the evolution of community character over time. Evaluate projects with regard to their impact on historic character, their role in shaping the desired future community character, and how future generations will view today's Burbank.

Goal 4: Public Spaces and Complete Streets

Policy 4.3: Use street trees, landscaping, street furniture, public art, and other aesthetic elements to enhance the appearance and identity of neighborhoods and public spaces.

Policy 4.4: Require public art as part of new development projects and public infrastructure. Incorporate public art within existing projects.

Policy 4.5: Require that pedestrian-oriented areas include amenities such as sidewalks of adequate width, benches, street trees and landscaping, decorative paving, public arts, kiosks, and restrooms.

Policy 4.6: Provide adequate open space and amenities in residential projects that encourage residents to gather and that supplement public open spaces.

Policy 4.7: Encourage artists, craftspeople, architects, and landscape architects to play key roles in designing and improving public spaces.

Policy 4.8: Locate parking lots and structures behind buildings or underground. Do not design parking lots and structures to face streets or sidewalks at ground level. Use alternatives to surface parking lots to reduce the amount of land devoted to parking.

Policy 4.9: Improve parking lot aesthetics and reduce the urban heat island effect by providing ample shade, low-water landscaping, and trees.

Policy 4.11: Ensure that public infrastructure meets high-quality urban design and architecture standards. Remove, relocate, or improve the appearance of existing infrastructure elements that are unsightly or visually disruptive.

Policy 4.12: Underground utilities for new development projects and projects within designated undergrounding districts.

Goal 10: Corridor Commercial Land Use

Policy 10.2: Ensure that ground-floor façades along primary frontages are attractive and facilitate pedestrian traffic through the use of windows, doors, and other design features.

Goal 11: Regional Commercial Land Use

Policy 11.4: Ensure that site design, architecture, and landscaping for regional commercial projects are high quality and fit the projects' prominent role in the community.

Mobility Element

The goals and policies of the Mobility Element are intended to increase mobility to allow for it to be equally available to all members of the community, regardless of their means of transportation. The Mobility Element is intended to reduce greenhouse gas emissions, improve air quality, and overall decrease Burbank's dependability on a single mode of travel (City of Burbank 2013). The goals and policies applicable to the project with respect to aesthetics, are presented below.

Goal 1: Balance

Burbank's transportation system ensures economic vitality while preserving neighborhood character.

> **Policy 1.5:** Design transportation improvements to be compatible with the scale and design of existing infrastructure.

Goal 3: Complete Streets

Burbank's complete streets will meet all mobility needs and improve community health.

> **Policy 3.3:** Provide attractive, safe street designs that improve transit, bicycle, pedestrian, and equestrian connections between homes and other destinations.

Open Space and Conservation

The goals, policies, and implementation programs of the Open Space and Conservation Element are intended to protect the natural environment and open space within the City and provide recreation opportunities to further enhance community health (City of Burbank 2013). The goals and policies applicable to the Project, with respect to aesthetics, are presented below.

Goal 7: Visual and Aesthetic Resources

Prominent ridgelines and slopes are protected as visual resources.

> **Policy 7.1:** Identify visually prominent ridgelines and establish regulations to promote their preservation.
>
> **Policy 7.3:** Recognize visual resources as a key element in open space acquisition programs.
>
> **Policy 7.4:** Balance both public good and private property rights when considering the restoration of viewsheds.

Plan Realization

The Plan Realization Element guides City elected officials, commission and committee members, staff, and the public in the overall effort to put into practice adopted Burbank2035 goals and policies. The purpose of the implementation programs provided in this element is to ensure that the overall directions set forth in Burbank2035 are translated from general ideas into actions. Each implementation program is a procedure, program, or technique that requires City action, either alone or in collaboration with non-City organizations or with federal and State agencies. The programs applicable to the Project, with respect to aesthetics, are presented below.

PROGRAM LU-1: ZONING ORDINANCE

The Zoning Ordinance, Title 10 of the Burbank Municipal Code (BMC), is the primary means of implementing the Land Use Element, as well as the other elements of Burbank2035. The Zoning

Ordinance includes the Zone Map that divides the City into various zones and the text that specifies the different land uses and types of development that are permitted within each zone. As the primary implementing tool, it is important that the Zoning Ordinance reflect and support the goals and policies of Burbank2035.

The following Zoning Ordinance amendments are required to implement Burbank2035:

- Establish development and design standards for single-family residential development to ensure that neighborhood character is maintained. Review these standards periodically to determine whether further changes would be appropriate.
- Maintain development standards for multi-family residential development, including requiring orientation to a public street. Continue to require open space in residential projects to supplement public open space. Review these standards periodically to determine whether changes would be appropriate.

PROGRAM LU-3: SPECIFIC PLAN

A specific plan is a planning tool authorized by California law that implements a general plan by establishing detailed development goals and policies for a specific geographic area. In Burbank, the term "specific plan" has been applied generally to any planning document that focuses on a particular area of the city. The City will complete the following action related to specific plans to implement Burbank2035:

- Review the three existing specific plans through a public process to determine whether the vision, goals, and policies established by the plans remain applicable and appropriate. Revise plans as necessary to ensure that they reflect current desires for each of the three areas.
- Consider creating new specific plan areas to create a sense of place, foster neighborhood identity, and address issues that are specific to each area.

City of Burbank Municipal Code and Zoning Ordinance

The BMC establishes regulations that implement the City's General Plan. Prior to implementation of the proposed Project, the following standards and regulations would be applicable to development within the Specific Plan Area. As described in Section 2, *Project Description*, the proposed Project includes objective development standards which would apply to development in Specific Plan Area, following approval of the proposed Project. Title 10 of the BMC, Zoning Regulations, contains a set of regulations that control the uses of land; the density of population; the locations, appearance, height and massing of structures; the open spaces associated with structures; dimensions of sites; and requirements pertaining to signage and on- and off-site parking. Furthermore, Title 10, Chapter 1, Article 21, Division 7, Design Standards, establishes a set of guidelines to address various aspects of design as it relates to private development within the Media District. These standards are flexible and allow for a variety of design responses. However, they set forth important concepts, which ensure that as private development proceeds, each project contributes to a cohesive, functional, and aesthetic Media District Overlay Zone. In addition to those regulations that will govern the height, density, setback, and design characteristics of the project, BMC Title 10, Chapter 1, Article 6, Division 4, Multi-Family Residential Zones, Section 10-1-628 (W) and Articles 11 through 16 of BMC Title 10 Chapter 1 establish property development standards with respect to light and glare that are applicable to projects within multifamily residential zones:

1. Lighting must be provided in all common areas including, but not limited to: parking garages, outdoor parking areas, common open space areas, pedestrian paths, stairways, and hallways.
2. Outdoor lighting fixtures must be positioned and directed so as not to shine or cause glare onto adjacent properties or public rights-of-way.
3. Free-standing lighting fixtures must be no taller than eight (8) feet as measured from the abutting ground surface or floor level.
4. All lighting fixtures must be consistent with the architectural style of the building.

Specific requirements per the BMC include:

- Section 10.1.624.V(2). Outdoor lighting fixtures shall be shielded and positioned and directed so as not to shine or cause glare onto adjacent properties or public rights-of-way.
- Section 10.1.624.V(3). Free-standing lighting fixtures shall be no taller than eight (8) feet as measured from the abutting ground surface or floor level.
- Section 10.1.628.W(2). Outdoor lighting fixtures must be positioned and directed so as not to shine or cause glare onto adjacent properties or public rights-of-way.
- Section 10.1.628.W(3). Free-standing lighting fixtures must be no taller than eight (8) feet as measured from the abutting ground surface or floor level.
- Section 10.1-920.F.1.a. Any residential lighting shall have a higher temperature rating than the lighting on the nonresidential portion of the project.
- Section 10.1-920.F.1.b. Free-standing lighting fixtures shall be no taller than eight (8) feet as measured from the abutting ground surface or floor level.
- Section 10.1-920.F.1.c. Outdoor lighting fixtures shall be positioned, and directed, and shielded so as not to shine or cause glare onto adjacent properties.
- Section 10.1.1153.A. Building Elevations facing a residential zone with 50 percent or more of the building surface in glass shall be limited to a maximum of 15 percent reflectivity for those materials. Building elevations facing a residential zone with less than 50 percent of surface glass shall be limited to a maximum of 20 percent reflectivity for those materials.
- Section 10.1-2107.H.1(i). All project lighting should be designed to eliminate glare onto adjacent properties.
- Section 10.1-2131.E. Glare and reflections can seriously interfere with the visibility of window displays. Careful design can minimize glare to enable displays to communicate more effectively. Arcades, canopies, non-reflective paving and artificial illumination shall be utilized to overcome the problem of glare to the extent possible. Building elevations with 50 percent or more of the building surface in glass or other reflective materials shall be limited to a maximum of 15 percent reflectivity for those materials. Building elevations with less than 50 percent of surface in glass or other reflective materials shall be limited to a maximum of 20 percent reflectivity for those materials.

BMC Section 10-1-1010 requires that an illuminated sign within a residential zone or within 500 feet of a residential zone, measured along the radius of a 180-degree arc in front of any face of the sign, shall not have a surface brightness greater than 100 footlamberts, and shall be illuminated by a source that is not exposed to view from the residential zone.

BMC Section 10-1-1153 requires the following:

A. Glare and Reflections

Building elevations facing a residential zone with 50 percent or more of the building surface in glass shall be limited to a maximum of 15 percent reflectivity for those materials. Building elevations facing a residential zone with less than 50 percent of surface in glass shall be limited to a maximum of 20 percent reflectivity for those materials.

B. Mechanical Venting

No mechanical venting shall face a residential zone, unless such mechanical venting is more than 300 feet from the nearest residentially zoned property. Further, no mechanical venting shall be located anywhere on the building within 50 feet from the nearest residentially zoned property.

C. Refuse Bin Lids

All commercial and industrial refuse bins shall be equipped with nonmetallic lids, which shall remain closed at all times except when refuse is being deposited or emptied. [Added by Ord. No. 3503, eff. 12/26/98.]

As part of the proposed Project, new objective development standards are proposed and would be required to address and remain consistent with the aesthetics-related goals and policies in the City of Burbank Neighborhood Compatibility Review and Design Guidelines.

City of Burbank Neighborhood Compatibility Review – Design Guidelines

BMC Title 10, Chapter 1, Section 10-1-631 states that permits shall not be issued and no structure shall be erected on a multiple family lot until a Development Review has been submitted and approved by the Community Development Director, which includes an evaluation of the project's neighborhood compatibility. The neighborhood compatibility review is intended to enhance the character of Burbank's residential neighborhoods and ensure that the design of new homes, additions, and alterations to existing dwellings are compatible with the existing community character. Design review is a discretionary review process for projects where the FAR is more than 0.35 or more than 500 square feet are being added.

Neighborhood compatibility design review includes consideration of building heights, massing, setbacks, garage location, orientation and location of main residential buildings and accessory structures, the size, location, and arrangement of on-site parking and paved areas, height, materials, and variety of fences, walls, and screen plantings, and the location and type of landscaping, including selection and size of plant materials, and design of hardscape. Each individual project accommodated under the proposed Project where the FAR is more than 0.35 or more than 500 square feet are being added would be required to undergo neighborhood compatibility review.

4.1.3 Impact Analysis

a. Thresholds of Significance

For the purposes of this environmental analysis, thresholds of significance are based on the questions in Appendix G of the *CEQA Guidelines,* which states that impacts related to aesthetics would be potentially significant if implementation of the proposed Project would do any of the following:

1. Have a substantial adverse effect on a scenic vista.
2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.
3. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings; or, in urbanized areas, conflict with applicable zoning and other regulations governing scenic quality.
4. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

Threshold 4 is analyzed below.

b. Effects Found Not to be Significant

Thresholds 1, 2, and 3 were determined to have a less than significant impact and, therefore, are discussed under Section 4.19, *Effects Found Not to be Significant*, and summarized below.

In Burbank, scenic vistas are limited to the Verdugo Mountains and Santa Monica Mountains (City of Burbank 2013). The Verdugo Mountains are located over 10 miles northeast of the Specific Plan Area and are not visible from the Specific Plan Area due to distance and intervening development. The Santa Monica Mountains are located directly south of the Specific Plan Area and, therefore, are visible from the Specific Plan Area with partial obstruction due to existing development. Development accommodated by the proposed Project would not substantially alter views of the Santa Monica Mountains due to the existing urbanized nature of the Specific Plan Area. Future development would be required to adhere to the building height regulations of the BMC and the proposed Project. Compliance with applicable BMC and proposed Project policies and regulations would minimize potential impacts to scenic vistas and impacts would be less than significant.

The California State Scenic Highway System Map indicates that there are no existing or proposed county or State scenic highways in or near the Specific Plan Area (Caltrans 2025). Therefore, any future development project under the proposed Project would not result in any damage to scenic resources in a State scenic highway, and, as such, no impact would occur.

The proposed Project would concentrate development in areas with opportunities for infill and intensification in a highly urbanized area. Any development project that would result from the implementation of the proposed Project would be consistent with City-related plans, policies, and regulatory requirements, as further detailed in Section 4.19, *Effects Found Not to be Significant*. Thus, impacts related to consistency with applicable regulations would be less than significant.

c. Methodology

The assessment of aesthetic impacts involves qualitative analysis that is inherently subjective in nature. Viewers react to views and aesthetic conditions differently. This impact analysis compares the existing light and glare environment of the Specific Plan Area to the anticipated future light and glare environment as a result of development under the proposed Project.

Because the Project pertains to an approximately 542-acre portion of the City, this analysis is aimed at identifying the broad light and glare impacts of implementing the proposed updates in the Specific Plan Area. Methods for research consisted of a desktop analysis and definition of the existing conditions that characterize the general setting of the Specific Plan Area and surrounding region. This assessment also includes a consistency check with relevant BMC and General Plan policies and regulations.

d. Project Impacts

Threshold 4:	Would the proposed Project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

Impact AES-1 THE PROPOSED PROJECT WOULD FACILITATE INFILL DEVELOPMENT THAT WOULD INTRODUCE NEW SOURCES OF LIGHT AND GLARE, WHICH WOULD AFFECT DAY OR NIGHTTIME VIEWS. COMPLIANCE WITH THE BURBANK MUNICIPAL CODE WOULD REDUCE POTENTIAL LIGHT AND GLARE IMPACTS TO A LESS THAN SIGNIFICANT LEVEL.

Approval of the proposed Project would facilitate infill development within the Specific Plan Area, including new multi-family residential and commercial developments. Development is anticipated to occur within the opportunity sites that are primarily located along the main mixed-use corridors including Alameda Avenue, Olive Avenue, Riverside Drive, Pass Avenue, and Hollywood Way. The high-density area consists of a broad range of development, including one-story commercial and residential development, low- and mid-rise commercial and residential buildings, high-rise commercial and office buildings, and studio lots that contain various types of structures. The lighting associated with the existing development consists of streetlights along roadways and in parking lots, illuminated signs, lighted recreational facilities, landscape lighting, building uplighting, and light emitted from the interiors of residential and nonresidential buildings.

Development projects under the proposed Project could potentially create new light/glare impacts from security lighting, parking structure lighting, ornamental lighting, pedestrian scale lights, lighting from ground-floor storefronts, and signs. New sources of glare would also occur from reflective building surfaces and vehicle surfaces or the headlights of vehicular traffic. Future development accommodated by the proposed Project would also be required to adhere to lighting standards and regulations detailed in Section 8.4.5.3 of Chapter 8, Zoning and Development Standards, of the proposed Project. These new sources of light or glare could affect adjacent light-sensitive land uses, such as residences and schools. As described above, most developments under the proposed Project may be exempt from aesthetic analysis requirements due to the designation of the Specific Plan Area as a TPA by SCAG, as outlined in SB 743. This legislative provision eliminates the requirement for aesthetic analysis for projects in TPAs for the purpose of CEQA streamlining. Figure 2-5 in Chapter 2, *Project Description*, shows the designated TPA over the Specific Plan Area boundary.

However, the Specific Plan Area is characterized by existing residential and commercial development uses that already experience high ambient levels of nighttime lighting, and, as such, any additional new light sources and light levels would increase due to the increase in density and intensity of future development projects in the Specific Plan Area. During design review, development projects under the proposed Project would be required to comply with the aforementioned building and site design guidelines set forth by the proposed Project, as well as the BMC, which regulates the outdoor lighting positioning to not shine or cause glare to right-of-way pedestrians or vehicles, and the light intensity of signs that could impact neighboring light-sensitive uses through relevant BMC sections stated in the Section 4.1.2, *Regulatory Setting*.

Glare is a common phenomenon throughout Burbank primarily due to the occurrence of a high number of days per year with direct sunlight and the urbanized nature of the City. Daytime glare can result from sunlight reflecting off glass, other structural fixtures of buildings, and windshields of parked and moving vehicles within the roadways in the City. Future development accommodated by the proposed Project would also be required to adhere to glare standards and regulations detailed in Section 7.2.5.3., Lighting, of Chapter 7, Development Standards, of the proposed Project. Future

development under the proposed Project would also be required to comply with the BMC standards and regulations for lighting and glare affecting sensitive residential uses. Therefore, impacts related to increased light and glare under implementation of the proposed Project would be less than significant.

Determination

Less than significant impact

4.1.4 Cumulative Impacts

The geographic extent of cumulative analysis for light and glare is the City of Burbank, in particular the areas where development would occur under the Downtown Burbank Transit Oriented Development (TOD) Specific Plan (an consolidation and update to the North San Fernando Boulevard Master Plan and the Burbank Center Plan) and the Golden State Specific Plan (GSSP), as described in Section 3, *Environmental Setting*. As described in Section 3, *Environmental Setting,* the Downtown TOD Specific Plan would facilitate development of up to 9,944 residential units and 6,083,657 square feet of commercial and business development land uses; and the GSSP would facilitate development of up to 7,205 residential units and 3,149,623 square feet of commercial and business development land uses. Cumulative impacts may occur if impacts of the proposed Project combine with similar impacts of other projects in the cumulative scenario.

Scenic Vistas

Future development projects accommodated by the proposed Project and two Specific Plans specified above could result in impacts related to public views of scenic vistas, including the Verdugo Mountains and Santa Monica Mountains. Such impacts would be site-specific and would require evaluation on a case-by-case basis at the project level in accordance with each proposed development project.

Future mid- and high-rise development accommodated by the proposed Project and the two Specific Plans specified above would be typically visible from no more than several blocks away due to the presence of intervening development. High-rise buildings may be visible from longer distances, but at more than several blocks away, a single building would represent a small proportion of the overall vista and thus, would not substantially alter views of the Santa Monica Mountains or Verdugo Mountains. However, in general, increases in building height would not obstruct public views of scenic resources or vistas because scenic vistas generally are not available in these urbanized areas and, where vistas are available, new cumulative development would be consistent with the current urban landscape and thus would not substantially alter the nature of existing views along public rights-of-way or from other public view locations. Burbank is already urbanized with surrounding development and all development in the cumulative study area would be required to comply with applicable building regulations and guidelines related to building height from the BMC and Burbank2035 General Plan. Therefore, the incremental effect of the proposed Project related to scenic vistas would not be cumulatively considerable and cumulative impacts would be less than significant.

Scenic Resources

The California State Scenic Highway System Map indicates that there are no existing or proposed county or State scenic highways in or near Burbank (Caltrans 2024). The nearest scenic highway, Angeles Crest Highway, is approximately 5.8 miles northeast of City limits. Burbank is not visible from this segment of the Angeles Crest Highway due to distance and intervening mountainous terrain. Therefore, any future development project under the proposed Project, Downtown TOD Specific Plan,

and GSSP would not result in any damage to scenic resources in a State scenic highway. Therefore, the incremental effect of the proposed Project related to scenic resources would not be cumulatively considerable and there would be no cumulative impact.

Regulations Governing Scenic Quality

Future development projects accommodated by the proposed Project and two Specific Plans specified above would occur in highly urbanized areas of the city which could result in impacts related to scenic quality. However, such impacts would be site-specific and would require evaluation on a case-by-case basis at the project level in accordance with each proposed development project. Additionally, Burbank is already urbanized with surrounding development and all development in the cumulative study area would be required to comply with applicable building regulations and guidelines related to scenic quality from the BMC and General Plan. Each discretionary project would require separate discretionary approval and evaluation under CEQA, which would address potential impacts to scenic quality and identify necessary mitigation measures, where appropriate. Therefore, the incremental effect of the proposed Project related to consistency with regulations governing scenic quality would not be cumulatively considerable and cumulative impacts would be less than significant.

Light and Glare

Future development projects accommodated by the proposed Project and two Specific Plans specified above could result in impacts related to light and glare. Such impacts would be site-specific and would require evaluation on a case-by-case basis at the project level in accordance with each proposed development project. Additionally, Burbank is already urbanized with surrounding development and all development in the cumulative study area would be required to comply with applicable building regulations and guidelines related to light and glare from the BMC and General Plan. Each discretionary project would require separate discretionary approval and evaluation under CEQA, which would address potential impacts to light and glare and identify necessary mitigation measures, where appropriate. Therefore, the incremental effect of the proposed Project related to light and glare would not be cumulatively considerable and cumulative impacts would be less than significant.

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4.2 Air Quality

This section evaluates the potential environmental impacts related to air quality and health risks associated with implementation of the proposed Project. Specifically, this section reviews the proposed Project's impact on implementation of air quality plans, criteria pollutants, and exposure of sensitive receptors to substantial pollutant concentrations. The analysis includes both temporary impacts relating to construction activity and potential long-term impacts associated with operation. Other thresholds of significance associated with odors are discussed in Section 4.19, *Effects Found Not to be Significant;* therefore, these issues are not studied further herein.

4.2.1 Environmental Setting

a. Local Climate and Meteorology

The Burbank Media District Specific Plan Area (hereafter referred to as "Specific Plan Area") is located within the City of Burbank (hereafter referred to as "City" or "Burbank"). The City is in the South Coast Air Basin (SCAB)[1], which is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and the San Diego County Line to the south. The regional climate in the SCAB is semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality in the SCAB is primarily influenced by a wide range of emissions sources – such as dense population centers, heavy vehicular traffic, and industry – and weather.

The general region lies in the semi-permanent high-pressure zone of the eastern Pacific Ocean, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The SCAB is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and mountains and high desert around the rest of its perimeter, excluding a portion of the Salton Sea along the southern border.

The SCAB experiences a persistent temperature inversion (increasing temperature with increasing altitude) as a result of the Pacific High. This inversion limits the vertical dispersion of air contaminants, holding them relatively near the ground. As the sun warms the ground and the lower air layer, the temperature of the lower air layer approaches the temperature of the base of the inversion (upper) layer until the inversion layer finally breaks, allowing vertical mixing with the lower layer. This phenomenon is observed in mid to late afternoons on hot summer days. Winter inversions frequently break by midmorning.

The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations in the SCAB. On days of no inversion or high wind speeds, ambient air pollutant concentrations are lowest. During periods of low inversions and low wind speeds, air pollutants generated in urbanized areas are transported predominantly onshore into Riverside and San Bernardino counties.

[1] California is divided geographically into 15 air basins for managing the air resources of the State on a regional basis. Areas within each air basin are considered to share the same air masses and, therefore, are expected to have similar ambient air quality.

b. Air Pollutants of Primary Concern

Primary criteria pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack). The federal and State Clean Air Acts (CAA) mandate the control and reduction of certain air pollutants. Under these laws, the United States Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for "criteria pollutants" and other pollutants. Some pollutants are emitted directly from a source (e.g., vehicle tailpipe, an exhaust stack of a factory, etc.) into the atmosphere, including carbon monoxide, volatile organic compounds (VOC)/reactive organic gases (ROG),[2] nitrogen oxides (NO_X), particulate matter with diameters of up to ten microns (PM_{10}) and up to 2.5 microns ($PM_{2.5}$), sulfur dioxide, and lead. Other pollutants are created indirectly through chemical reactions in the atmosphere, such as ozone (O_3), which is created by atmospheric chemical and photochemical reactions primarily between VOC and NO_X. Secondary pollutants include oxidants, ozone, and sulfate and nitrate particulates (smog). The following subsections describe the characteristics, sources, and health and atmospheric effects of air pollutants of primary concern. The standards are set at a level that protects public health with an adequate margin of safety for these six criteria pollutants. The characteristics of each of these pollutants are briefly described below.

Ozone

O_3 is produced by a photochemical reaction (triggered by sunlight) between NO_X and VOC. VOCs are composed of non-methane hydrocarbons (with some specific exclusions), and NO_X are composed of different chemical combinations of nitrogen and oxygen, mainly nitric oxide (NO) and NO_2. NO_X are formed during the combustion of fuels, while VOCs are formed during combustion and evaporation of organic solvents. As a highly reactive molecule, O_3 readily combines with many different components of the atmosphere. Consequently, high levels of O_3 tend to exist only while high VOC and NO_X levels are present to sustain the O_3 formation process. Once the precursors have been depleted, O_3 levels rapidly decline. Because these reactions occur on a regional rather than local scale, O_3 is considered a regional pollutant. In addition, because O_3 requires sunlight to form, it mostly occurs in concentrations considered serious between the months of April and October. O_3 is a pungent, colorless, toxic gas with direct health effects on humans, including changes in breathing patterns, reduction of breathing capacity, increased susceptibility to infections, inflammation of lung tissue, and some immunological changes (South Coast Air Quality Management District [SCAQMD] 2005; USEPA 2025a). Groups most sensitive to O_3 include children, the elderly, persons with respiratory disorders, and people who exercise strenuously outdoors.

Carbon Monoxide

CO is a localized pollutant that is found in high concentrations only near its source. The major source of CO, a colorless, odorless, poisonous gas, is the incomplete combustion of petroleum fuels by automobile traffic. Therefore, elevated concentrations are usually only found near areas of high traffic volumes. Other sources of CO include the incomplete combustion of petroleum fuels at power plants and fuel combustion from wood stoves and fireplaces during the winter. The health effects of CO are related to its affinity for hemoglobin in the blood. CO causes a number of health problems, including aggravation of some heart diseases (e.g., angina), reduced tolerance for exercise, impaired mental function, and impaired fetal development. At high levels of exposure, CO reduces the amount of

[2] CARB defines VOC and ROG similarly as, "any compound of carbon excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate," with the exception that VOC are compounds that participate in atmospheric photochemical reactions. For the purposes of this analysis, ROG and VOC are considered comparable in terms of mass emissions, and the term VOC is used in this analysis.

oxygen in the blood, leading to mortality (SCAQMD 2005; USEPA 2025b). CO tends to dissipate rapidly into the atmosphere; consequently, violations of ambient air quality standards for CO are generally associated with localized CO "hotspots" that can occur at major roadway intersections during heavy peak-hour traffic conditions.

Nitrogen Dioxide

NO_2 is a by-product of fuel combustion; the primary sources are motor vehicles and industrial boilers and furnaces. The principal form of NO_X produced by combustion is NO, but NO reacts rapidly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. NO_2 is an acute irritant that can aggravate respiratory illnesses and symptoms, particularly in sensitive groups (SCAQMD 2005; USEPA 2025c). A relationship between NO_2 and chronic pulmonary fibrosis may exist, and an increase in bronchitis in young children at concentrations below 0.3 parts per million (ppm) may occur. NO_2 absorbs blue light, gives a reddish-brown cast to the atmosphere, and reduces visibility (SCAQMD 2005; USEPA 2025a). It can also contribute to the formation of PM_{10} and acid rain.

Sulfur Dioxide

SO_2 is included in a group of highly reactive gases known as "oxides of sulfur." The largest sources of SO_2 emissions are from fossil fuel combustion at power plants (73 percent) and other industrial facilities (20 percent). Smaller sources of SO_2 emissions include industrial processes, such as extracting metal from ore, and the burning of fuels with a high sulfur content by locomotives, large ships, and off-road equipment. SO_2 is linked to a number of adverse effects on the respiratory system, including aggravation of respiratory diseases, such as asthma and emphysema, and reduced lung function (SCAQMD 2005; USEPA 2025d).

Suspended Particulates

Small particulate matter measuring 10 microns or less in diameter is PM_{10}, while fine particulate matter measuring 2.5 microns or less in diameter is $PM_{2.5}$. Both PM_{10} and $PM_{2.5}$ are directly emitted into the atmosphere as by-products of fuel combustion and wind erosion of soil and unpaved roads. Particulate matter is also created in the atmosphere through chemical reactions. The characteristics, sources, and potential health effects associated with PM_{10} and $PM_{2.5}$ can be very different. PM_{10} is generally associated with dust mobilized by wind and vehicles while $PM_{2.5}$ is generally associated with combustion processes, as well as formation in the atmosphere as a secondary pollutant through chemical reactions. $PM_{2.5}$ is more likely to penetrate deeply into the lungs and poses a health threat to all groups but particularly to the elderly, children, and those with respiratory problems (CARB 2025e). More than half of the small and fine particulate matter that is inhaled into the lungs remains there. These materials can damage health by interfering with the body's mechanisms for clearing the respiratory tract or by acting as carriers of an absorbed toxic substance. Suspended particulates can also reduce lung function, aggravate respiratory and cardiovascular diseases, increase mortality rates, and reduce lung function growth in children (SCAQMD 2005; USEPA 2025e).

Lead

Pb is a metal found naturally in the environment, as well as in manufacturing products. The major sources of Pb emissions historically have been mobile and industrial sources. However, as a result of the USEPA's regulatory efforts to remove Pb from gasoline, atmospheric Pb concentrations have declined substantially over the past several decades. The most dramatic reductions in Pb emissions occurred prior to 1990 due to the removal of Pb from gasoline sold for most highway vehicles. Pb

emissions were further reduced substantially between 1990 and 2008, with reductions occurring in the metals industries at least in part as a result of national emissions standards for hazardous air pollutants (USEPA 2025f). As a result of phasing out leaded gasoline, metal processing currently is the primary source of Pb emissions. The highest level of Pb in the air is generally found near Pb smelters. Other stationary sources include waste incinerators, utilities, and lead-acid battery manufacturers. The health impacts of Pb include behavioral and hearing disabilities in children and nervous system impairment (SCAQMD 2005; USEPA 2025a).

Toxic Air Contaminants

Toxic air contaminants (TACs) are a diverse group of air pollutants that may cause or contribute to an increase in deaths or serious illness, or that may pose a present or potential hazard to human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. One of the main sources of TACs in California is diesel engine exhaust that contains solid material known as diesel particulate matter (DPM). More than 90 percent of DPM is less than one micron in diameter (about $1/70^{th}$ the diameter of a human hair) and, thus, is a subset of $PM_{2.5}$. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs (CARB 2025e). Particulate matter emitted from diesel engines contributes more than 70 percent of the air emission cancer risk associated with the on-road heavy-duty sector within the SCAB (SCAQMD 2017).

TACs are different than criteria pollutants because ambient air quality standards have not been established for TACs. TACs occurring at extremely low levels may still cause health effects, and it is typically difficult to identify levels of exposure that do not produce adverse health effects. TAC impacts are described by carcinogenic risk and by chronic (i.e., long duration) and acute (i.e., severe but of short duration) adverse effects on human health.

c. Ambient Air Quality

Ambient air quality is determined primarily by the type and amount of pollutants emitted into the atmosphere, as well as the size, topography, and meteorological conditions of a geographic area. The SCAB has low mixing heights and light winds, which result in the accumulation of air pollutants. Exhaust emissions from mobile sources generate the majority of VOC, CO, NO_X, and SO_X both in the SCAB generally and specifically the Los Angeles County portion of the SCAB. Area-wide sources generate the most airborne particulates (i.e., PM_{10} and $PM_{2.5}$) in both the SCAB and Los Angeles County. The federal and State governments have established ambient air quality standards for the protection of public health.

The USEPA has set primary NAAQS for O_3, CO, NO_2, PM_{10}, $PM_{2.5}$, SO_2, and Pb. Primary standards are those levels of air quality deemed necessary, with an adequate margin of safety, to protect public health. In addition, California has established health-based ambient air quality standards, the CAAQS, for these and other pollutants, some of which are more stringent than the NAAQS. If an air basin is not in either federal or State attainment for a particular pollutant, the basin is classified as a nonattainment area for that pollutant. Under the federal and State CAA, once a nonattainment area has achieved the air quality standards for a particular pollutant, it may be redesignated to an attainment area for that pollutant. To be redesignated, the area must meet air quality standards and have a 10-year plan for continuing to meet and maintain air quality standards, as well as satisfy other requirements of the federal CAA. Areas that have been redesignated to attainment are called maintenance areas. The project site is within Los Angeles County, which currently exceeds the NAAQS

for 8 and 1-hour O_3, $PM_{2.5}$, and Pb. Los Angeles County is classified an attainment/maintenance area under the CAAQS for CO, and attainment for $PM_{2.5}$. Los Angeles County is currently classified as a nonattainment area under the CAAQS for O_3, $PM_{2.5}$, and PM_{10} (CARB 2023). Table 4.2-1 lists the current federal and state standards for regulated pollutants and the attainment status of the SCAB for each pollutant.

Table 4.2-1 Federal and State Ambient Air Quality Standards

		California Ambient Air Quality Standards		National Ambient Air Quality Standards	
Pollutant	**Averaging Time**	**Concentration**	**Attainment Status**	**Concentration**	**Attainment Status**
Ozone	8-Hour	0.070 ppm	N	0.070 ppm	N
	1-Hour	0.09 ppm	N	–	–
Carbon Monoxide	8-Hour	9 ppm	A	9 ppm	A
	1-Hour	20 ppm	A	35 ppm	A
Nitrogen Dioxide	1-Hour	0.18 ppm	A	0.100 ppm	U/A
	Annual Arithmetic Mean	0.030 ppm		0.053 ppm	A
Sulfur Dioxide	24-Hour	0.04 ppm	A	0.14 ppm	U/A
	1-Hour	0.25 ppm	A	0.075 ppm	U/A
	Annual Arithmetic Mean	–	–	0.030 ppm	U/A
Particulate Matter – Small (PM_{10})	Annual Arithmetic Mean	20 µg/m^3	N	–	–
	24-Hour	50 µg/m^3	N	150 µg/m^3	A
Particulate Matter – Fine ($PM_{2.5}$)	Annual Arithmetic Mean	12 µg/m^3	N	9 µg/m^3	N
	24-Hour	–	–	35 µg/m^3	N
Sulfates	24-Hour	25 µg/m^3	A	–	–
Lead	Rolling 3-Month Average	–		0.15 µg/m^3	N[1]
	30-Day Average	1.5 µg/m^3	A	–	–
Hydrogen Sulfide	1-Hour	0.03 ppm (42 µg/m^3)	A	–	
Vinyl Chloride (Chloroethene)	24-Hour	0.010 ppm (26 µg/m^3)	A	–	–
Visibility Reducing Particles[2]	8-Hour (10:00 to 18:00 PST)	–	No information available	–	–

A = attainment; N = nonattainment; U = unclassified; ppm=parts per million; µg/m^3=micrograms per cubic meter; PST = Pacific Standard Time

[1] Partial Nonattainment designation – Los Angeles County portion of the SCAB only for near-source monitors. Expect re-designation to attainment based on current monitoring data.

[2] While ambient air quality standards are available for lead, hydrogen sulfide, vinyl chloride, or visibility reducing particles, these pollutants are not evaluated for the purposes of CEQA and are provided for informational purposes only.

Source: SCAQMD 2023; CARB 2025a,b; USEPA 2025g

d. Sensitive Receptors

There is a strong connection between health risk and the proximity of the source of air pollution. Local jurisdictions have the responsibility for determining land use compatibility for sensitive receptors. A sensitive receptor is a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified the following population groups that are most likely affected by air pollution: children less than 14 years of age, adults over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. Land uses where these population groups are likely to spend a substantial amount of time are considered sensitive receptors. According to SCAQMD, land uses with sensitive receptors include the following (SCAQMD 2005):

- Schools, playgrounds, and childcare centers
- Long-term health care facilities
- Rehabilitation centers
- Convalescent centers
- Hospitals
- Retirement homes
- Residences

e. Ambient Air Quality Measurements

SCAQMD divides the SCAB into 38 source receptor areas (SRAs), wherein 38 monitoring stations operate to monitor the various concentrations of air pollutants in the region. The purpose of the monitoring stations is to measure ambient concentrations of pollutants and determine whether ambient air quality meets the CAAQS and the NAAQS. The monitoring station located closest to the Specific Plan Area is the Los Angeles-North Main Street station approximately eight miles southwest of the Specific Plan Area.[3]

The eight-hour O_3 concentration at this monitoring station exceeded both State and federal standards on two days in 2021, six days in 2022, and seven days in 2023. The O_3concentration exceeded State one-hour standards for one day in 2021, 2022 and 2023. The $PM_{2.5}$ concentration exceeded standards for 13 days in 2021. No exceedances of federal standards for NO_2 or PM_{10} have occurred at the monitoring station in the last three years; however, the State PM_{10} standard was exceeded 14 times in 2021.

4.2.2 Regulatory Setting

The Federal CAA governs air quality in the United States. In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). At the federal level, the CAA is administered by the USEPA. In California, the CCAA is administered by CARB at the State level and by air quality management districts (AQMDs) or air pollution control districts (APCDs) at the regional and local levels.

Air quality in the SCAB, in which the Specific Plan Area is located, is addressed through the efforts of various federal, State, regional, and local government agencies. These agencies work jointly, as well

[3] Table 1 of Appendix C indicates the number of days that each of the standards has been exceeded at the Los Angeles-North Main Street that station in 2021, 2022, and 2023.

as individually, to improve air quality through legislation, regulations, planning, policymaking, education, and a variety of programs. The agencies responsible for improving air quality in the SCAB are discussed below.

a. Federal Regulations

The CAA was enacted in 1970 and amended in 1977 and 1990 (42 United States Code [USC] 7401) for the purpose of protecting and enhancing the quality of the nation's air resources to benefit public health, welfare, and productivity. The CAA is organized into Titles I through VI. Of these, Title I and Title II pertain to ambient air quality standards for stationary sources and emission standards for mobile sources, respectively.

Title I directs the USEPA to establish NAAQS for six criteria pollutants to protect public health and welfare. To achieve the purposes of Section 109 of the CAA [42 USC 7409], the USEPA developed primary and secondary NAAQS. The primary NAAQS are the standards which, "in the judgment of the Administrator," [4] are required to protect the public health, and the secondary standards are to "protect the public welfare from any known or anticipated adverse effects associated with the presence of such air pollutant in the ambient air" (42 USC 7409[b][2]). The USEPA classifies specific geographic areas as either "attainment" or "nonattainment" areas for each pollutant based on the comparison of measured data with the NAAQS.

To derive the NAAQS, the USEPA reviews data from integrated science assessments and risk/exposure assessments to determine the ambient pollutant concentrations at which human health impacts occur, then reduces these concentrations to establish a margin of safety (USEPA 2024h). As a result, human health impacts caused by the air pollutants discussed above may affect people when ambient air pollutant concentrations are at or above the concentrations established by the NAAQS. The closer a region is to attainting a particular NAAQS, the lower the human health impact is from that pollutant. Accordingly, ambient air pollutant concentrations below the NAAQS are considered to be protective of human health (CARB 2025c; 2025d). The NAAQS and the underlying science that forms the basis of the NAAQS are reviewed every five years to determine whether updates are necessary to continue protecting public health with an adequate margin of safety.

States are required to adopt enforceable plans, known as a State Implementation Plan (SIP), to achieve and maintain air quality meeting the NAAQS. The SIPs are intended to achieve and maintain these standards, with additional requirements for areas designated as nonattainment. It also includes regulations for hazardous air pollutants, new and modified stationary sources, and provisions like Prevention of Significant Deterioration to limit pollution in clean air areas. State plans also must control emissions that drift across state lines and harm air quality in downwind states. As shown above, Table 4.2-1 lists the current federal standards for regulated pollutants.

Title II addresses air pollution from mobile sources, such as cars, trucks, buses, and non-road engines. It authorizes the EPA to set emission limits for vehicles and engines, regulate fuel composition, and require inspection and maintenance programs in certain areas. The title also covers emissions from sources like airplanes, ships, and construction equipment, promoting cleaner technologies and alternative fuels.

[4] The term "Administrator" means the Administrator of the United States EPA.

b. State Regulations

California Clean Air Act

The CCAA was enacted in 1988 (California Health & Safety Code §39000 et seq.). Under the CCAA, the State has developed the CAAQS, which are generally more stringent than the NAAQS. Table 4.2-1 also lists the current State standards for regulated pollutants. In addition to the federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride. Similar to the federal CAA, the CCAA classifies specific geographic areas as either "attainment" or "nonattainment" areas for each pollutant, based on the comparison of measured data within the CAAQS.

CARB administers the air quality policy in California and is responsible for implementing the CCAA. These standards, included with the NAAQS in Table 4.2-1, are generally more stringent and apply to more pollutants than the NAAQS. In addition to the criteria pollutants, CAAQS have been established for visibility reducing particulates, hydrogen sulfide, and sulfates. The CCAA, requires that each local air district prepare and maintain an Air Quality Management Plan (AQMP) to achieve compliance with CAAQS. These AQMPs also serve as the basis for the preparation of the SIP for the State of California.

Like USEPA, CARB also designates areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data show that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment.

In addition to the established standards for criteria pollutants, California has also adopted other regulations that aim to reduce criteria pollutant emissions:

- **AB 1493 (2002). Pavley Bill**. AB 1493 directed CARB to adopt regulations that achieve the maximum feasible and cost-effective reduction of greenhouse gas (GHG) emissions from motor vehicles (Health and Safety Code §43018.5). Pavley I is a fuel efficiency standard intended to reduce GHG emissions from new passenger vehicles, including light-duty and medium-duty vehicles, starting with model year 2009. The Advanced Clean Cars program (Pavley II) was adopted in 2012 and expands on these standards with stricter fuel efficiency and emissions limits for model years 2017 through 2025. In 2022, CARB adopted the Advanced Clean Cars II regulations to include more stringent standards for emissions from light-duty vehicles for model years 2026 and beyond.
- **SB 1078 (2002), SB 107 (2006), SB 350 (2015), SB 100 (2018). Renewables Portfolio Standards (RPS) Program**. California's RPS program was established in 2002 by SB 1078 and expanded upon by SB 107, which originally required that 20 percent of electricity retail sales must be served by renewable resources by 2017. The program was accelerated in 2015 with SB 350 which mandated a 50 percent RPS by 2030. SB 350 includes interim annual RPS targets with three-year compliance periods and requires 65 percent of RPS procurement to be derived from long-term contracts of 10 or more years. In 2018, SB 100 was signed into law, which again increases the RPS to 60 percent by 2030 and requires all the state's electricity to come from carbon-free resources by 2045.

Toxic Air Contaminants

In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health (Assembly Bill [AB] 1807: Health and Safety Code Sections 39650–39674). The Legislature established a two-step process to address

the potential health effects from TACs. The first step is the risk assessment (or identification) phase. The second step is the risk management (or control) phase of the process.

The Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, 1987, Connelly) was enacted in 1987 and requires stationary sources to report the types and quantities of certain substances routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, identify facilities having localized impacts, ascertain health risks, notify nearby residents of significant risks, and reduce those significant risks to acceptable levels. The Children's Environmental Health Protection Act, California Senate Bill (SB) 25 (Chapter 731, Escutia, Statutes of 1999), focuses on children's exposure to air pollutants. The act requires CARB to review its air quality standards from a children's health perspective, evaluate the statewide air quality monitoring network, and develop any additional air toxic control measures needed to protect children's health.

State Implementation Plan

The SIP is a collection of documents that set forth a state's strategies for achieving the NAAQS. In California, the SIP is a compilation of new and previously submitted plans, programs (such as monitoring, modeling, and permitting), district rules, State regulations, and federal controls. CARB is the lead agency for all purposes related to the SIP under State law. Local air districts and other agencies, such as the Department of Pesticide Regulation and the Bureau of Automotive Repair, prepare SIP elements and submit them to CARB for review and approval. CARB then forwards SIP revisions to the USEPA for approval and publication in the Federal Register. The items included in the California SIP are listed in the Code of Federal Regulations at 40 Code of Federal Regulations 52.220.

As the regional air quality management district, SCAQMD is responsible for preparing and implementing the portion of the SIP applicable to the portion of the SCAB within its jurisdiction. The air pollution control district for each county adopts rules, regulations, and programs to attain federal and State air quality standards and appropriates money (including permit fees) to achieve these objectives.

California Code of Regulations

The California Code of Regulations (CCR) is the official compilation and publication of the regulations adopted, amended, or repealed by state agencies pursuant to the California Administrative Procedure Act. The following CCRs are applicable to the proposed Project:

- **Engine Idling.** In accordance with Section 2485 of Title 13 of the CCR, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.
- **Emission Standards.** In accordance with Section 93115 of Title 17 of the CCR, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.
- **Appliance Energy Efficiency Standards.** Title 20, Article 4 of the CCR sets minimum efficiency standards for various appliances and equipment sold or offered for sale in California, including both federally-regulated and non-federally-regulated products.
- **Building Energy Efficiency Standards.** Title 24, Part 6 of the CCR sets mandatory energy conservation standards for both residential and non-residential buildings.
- **Green Building Standards.** Title 24, Part 11 of the CCR introduces planning and design standards for sustainable development, including for water efficiency, material conservation, and indoor air quality,

c. Local Regulations

South Coast Air Quality Management District 2022 Air Quality Management Plan

As agency principally responsible for comprehensive air pollution control in the SCAB, SCAQMD has adopted a series of air quality management plans (AQMPs), which serve as a regional blueprint to develop and implement an emission reduction strategy that will bring the area into attainment with the NAAQS and CAAQS with the standards in a timely manner. The current AQMP, (2022 AQMP), includes strategies to ensure SCAQMD does its part to further the Air District's ability to meet the 2015 federal O_3 standards (SCAQMD 2022). The 2022 AQMP builds on the measures already in place from the previous AQMPs and includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technology, best management practices, co-benefits from existing programs, incentives, and other CAA measures to meet the 8-hour O_3 standard.

The 2022 AQMP is composed of stationary and mobile source emission reductions from traditional regulatory control measures, incentive-based programs, co-benefits from climate programs, mobile source strategies, and reductions from federal sources, which include aircraft, locomotives, and ocean-going vessels. These strategies are to be implemented in partnership with the CARB and USEPA. In addition, the 2022 AQMP relies on substantial future development of advanced technologies to meet the standards, including the transition to zero and low emission technologies (SCAQMD 2022).

The 2022 AQMP also incorporates the transportation strategy and transportation control measures from Southern California Association of Governments (SCAG)'s 2020-2045 RTP/SCS Plan (Connect SoCal) (SCAG 2020). SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial counties, and addresses regional issues relating to transportation, the economy, community development, and the environment. Pursuant to California Health and Safety Code Section 40460, SCAG has the responsibility of preparing and approving the portions of the AQMP relating to the regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and State air quality plans to attain the NAAQS. The 2024-2050 RTP/SCS includes transportation programs, measures, and strategies generally designed to reduce VMT, which are contained in the AQMP. SCAQMD combines its portion of the AQMP with those prepared by SCAG (SCAQMD 2022). The region is projected to see a 12 percent growth in population, 17 percent growth in housing units, 11 percent growth in employment, and 5 percent growth in VMT between 2018 and 2037. Despite regional growth in the past, air quality has improved substantially over the years, primarily due to the effects of air quality control programs at the local, State, and federal levels (SCAQMD 2022).

Project-level significance thresholds established by local air quality management districts set the level at which a project would cause or have a cumulatively considerable contribution to an exceedance of the NAAQS and/or CAAQS. Therefore, if a project's air pollutant emissions exceed the NAAQS and/or CAAQS, the project could cause or contribute to human health impacts.

South Coast Air Quality Management District Rules and Regulations

SCAQMD implements rules and regulations for emissions that may be generated by various uses and activities. The rules and regulations detail pollution-reduction measures that must be implemented during construction and operation of projects. Rules and regulations relevant to the project include the following:

- **Rule 401 Visible Emissions.** This rule prohibits the discharge of visible air pollutant emissions from various sources as determined by shade and opacity criteria based on the Ringelmann Chart.
- **Rule 402 Nuisance.** This rule prohibits the discharge of quantities of air contaminants or other material that causes injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property.
- **Rule 403 Fugitive Dust Control.** This rule includes various requirements to prevent, reduce, and mitigate the amount of particulate matter entrained in the ambient air from man-made fugitive dust sources.
- **Rule 1113 Architectural Coatings.** This rule establishes VOC content limits for a variety of architectural coatings, including 50 grams per liter for flat and non-flat coatings.
- **Rule 1138 Control of Emissions from Restaurant Operations.** This rule is intended to reduce PM and VOC emissions from restaurant operations, specifically from chain-driven charbroilers.
- **Rule 1403 Asbestos Emissions from Demolition/Renovation Activities.** This rule specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials (ACM).
- **Rule 1470 Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines.** This rule reduces diesel particulate matter (DPM) emissions and exposure to those emissions from stationary diesel-fueled internal combustion and other compression ignition engines.
- **Rule 1168 Adhesive and Sealant Applications.** This rule reduces emissions of VOCs and eliminates emissions of chloroform, ethylene dichloride, methylene chloride, perchloroethylene, and trichloroethylene from the application of adhesives, adhesive bonding primers, adhesive primers, sealants, sealant primers, or any other primers.
- **Regulation XIII New Source Review.** This regulation contains Rules 1300 through 1325, which set forth pre-construction review requirements for new, modified, or relocated facilities, to ensure that the operation of such facilities does not interfere with progress in attainment of the NAAQS and that future economic growth within SCAQMD is not unnecessarily restricted. The specific air quality goal of this regulation is to achieve no net increases from new or modified permitted sources of nonattainment air contaminants or their precursors.

Southern California Association of Governments RTP/SCS

SCAG is the Council of Governments for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. As a regional planning agency, SCAG serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. Although SCAG is not an air quality management agency, it is responsible for developing transportation, land use, and energy conservation measures that improve air quality. The 2020-2045 RTP/SCS was developed through a four-year planning process to update population, housing and employment data, as well as transportation strategies for the region through the horizon year of 2045 (SCAG 2020). Compared to the previous 2016-2040 RTP/SCS, the 2020-2045 RTP/SCS projected fewer residents, jobs, and housing units. The 2020-2045 RTP/SCS predicted approximately 290,000 fewer residents, 80,000 fewer houses, and 210,000 fewer jobs in the region in 2040 than under the 2016-2040 RTP/SCS, representing less activities and associated emissions than would have been predicted under the 2016-

2040 RTP/SCS. The impact analysis throughout this section uses the demographic data provided in the 2020-2045 RTP/SCS.

In April 2024, SCAG's Regional Council adopted the 2024-2050 RTP/SCS for federal transportation conformity purposes. The 2024-2050 RTP/SCS builds upon the progress made through implementation of the 2020-2045 RTP/SCS and includes goals focused on promoting economic prosperity, improving mobility, protecting the environment, and supporting healthy/complete communities. The objective of the 2024-2050 RTP/SCS is to create a region with transit as a backbone of the transportation system, provide more Complete Streets, promote policies that encourage emerging technologies and mobility innovations, co-locate more housing, jobs, and mobility options, increase housing, and provide safe and fluid movement of goods while broadening the use of zero- and near-zero emissions technologies (SCAG 2024). The 2024-2050 RTP/SCS is discussed in greater detail in Section 4.7, *Greenhouse Gas Emissions*.

d. Local Regulations

Burbank2035 General Plan

The Burbank2035 General Plan includes goals, policies, and programs that would impact future air emissions generated by land uses within the City. These include Mobility Programs M-6 (Transit System), M-7 (Bicycle Master Plan and Pedestrian Master Plan), and M-10 (Transportation Demand Management). Burbank2035 also includes an Air Quality and Climate Change Element, which is an optional element (i.e., not required by State law), pursuant to California Government Code Section 65303. This element is specifically designed to reduce the City's air pollutant emissions and comply with Statewide goals. The Air Quality and Climate Change Element of Burbank2035 contains the following policies and programs that reduce potential air quality impacts:

Policy 1.1 Coordinate air quality planning efforts with local, regional, state, and federal agencies, and evaluate the air quality effects of proposed plans and development projects.

Policy 1.2 Seek to attain or exceed the more stringent federal or state ambient air quality standards for each criteria air pollutant.

Policy 1.5 Require projects that generate potentially significant levels of air pollutants, such as landfill operations or large construction projects, to incorporate best available air quality and greenhouse gas mitigation in project design.

Policy 1.6 Require measures to control air pollutant emissions at construction sites and during soil disturbing or dust-generating activities (i.e., tilling, landscaping) for projects requiring such activities.

Policy 1.9 Encourage the use of zero-emission vehicles, low-emission vehicles, bicycles, and other non-motorized vehicles, and car-sharing programs. Consider requiring sufficient and convenient infrastructure and parking facilities in residential developments and employment centers to accommodate these vehicles.

Policy 2.1 Mitigate emissions from retail food grilling and barbequing (indoor and outdoor) through the use of industry-specific equipment.

Policy 2.2 Separate sensitive uses such as residences, schools, parks, and day care facilities from sources of air pollution and toxic chemicals. Provide proper site planning and design features to buffer and protect when physical separation of these uses is not feasible.

Policy 2.3 Require businesses that cause air pollution to provide pollution control measures.

Policy 2.4 Reduce the effects of air pollution, poor ambient air quality, and urban heat island effect with increased tree planting in public and private spaces.

Policy 2.5 Require the use of recommendations from the California Air Resources Board's Air Quality and Land Use Handbook to guide decisions regarding location of sensitive land uses.

Policy 3.2 Establish a goal and strategies to reduce communitywide greenhouse gas emissions by at least 30% from current levels by 2035.

Program AQCC-4 **Health Risk Assessments for Stationary and Mobile Sources.** Project proponents must prepare health risk assessments following SCAQMD guidance when projects could involve toxic air emissions or place sensitive uses near **the Hollywood Burbank** Airport, rail lines, or freeways. The City will require site-specific analysis and feasible mitigation (e.g., air filtration, tree buffers, or building design adjustments) based on ARB siting recommendations to reduce health risks.

Program AQCC-5 **Environmental Review.** As part of environmental review, the City will use SCAQMD CEQA Guidelines to evaluate GHG emissions and provide health risk assessment guidance, including screening tools and buffer zones, in the absence of SCAQMD direction. Project applicants must meet established evaluation and mitigation requirements for project approval.

4.2.3 Impact Analysis

a. Thresholds of Significance

According to Appendix G of the *CEQA Guidelines,* impacts related to air quality would be potentially significant if implementation of the proposed Project would result in any of the following:

1. Conflict with or obstruct implementation of the applicable air quality plan.
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.
3. Expose sensitive receptors to substantial pollutant concentrations.
4. Result in other emissions (such as those leading to odor) adversely affecting a substantial number of people.

Thresholds 1 through 3 are analyzed in this section of the EIR.

SCAQMD Thresholds

As stated in the *CEQA Guidelines*, the significance criteria established by the regional air quality management district or air pollution control district may be relied upon to make significance determinations. SCAQMD has adopted guidelines for quantifying and determining the significance of air quality emissions in its *SCAQMD CEQA Air Quality Handbook* and supplemental updates (SCAQMD 1993, 2008, and 2023).

Regional Significance Thresholds

SCAQMD recommends the use of quantitative regional significance thresholds to evaluate emissions generated by temporary construction activities and long-term Project operation in the SCAB, which are shown in Table 4.2-2. Project-level significance thresholds established by local air districts set the

level at which a project would cause or have a cumulatively considerable contribution to an exceedance of a federal or State ambient air quality standard. Therefore, if a project's air pollutant emissions exceed the significance thresholds, the project could cause or contribute to the human health impacts described under Section 4.2.1(b), *Air Pollutants of Primary Concern*. For example, SCAQMD has set its operational significance threshold for VOCs based in part on the significance level for stationary sources of emissions established by Section 182(e) of the federal Clean Air Act. SCAQMD developed its other significance thresholds "based on scientific and factual data that is contained in the federal and state Clean Air Acts" (SCAQMD 1993).

Table 4.2-2 SCAQMD Regional Significance Thresholds

Construction Thresholds	Operational Thresholds
75 pounds per day of ROG	55 pounds per day of ROG
100 pounds per day of NO_X	55 pounds per day of NO_X
550 pounds per day of CO	550 pounds per day of CO
150 pounds per day of SO_X	150 pounds per day of SO_X
150 pounds per day of PM_{10}	150 pounds per day of PM_{10}
55 pounds per day of $PM_{2.5}$	55 pounds per day of $PM_{2.5}$

Source: SCAQMD 2023

SCAQMD has also developed Localized Significance Thresholds (LSTs) in response to the Governing Board's Environmental Justice Enhancement Initiative (1-4), which was prepared to update the *CEQA Air Quality Handbook* (1993). LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities and have been developed for NO_X, CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or State ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each SRA, distance to the sensitive receptor, and project size. LSTs have been developed for emissions within construction areas up to five acres in size.

The Specific Plan Area is located in SRA 7 (East San Fernando Valley). SCAQMD sets LST values for construction and operation of projects with lot sizes from less than one acre up to five acres and at distances from 25 meters to 500 meters (SCAQMD 2008). LSTs only apply to on-site emissions and are not applicable to off-site mobile sources, such as vehicles on a roadway (SCAQMD 2008). As such, LSTs for future development projects facilitated by the proposed Project would only apply to construction emissions because the majority of operational emissions from residential and commercial uses are associated with project-generated vehicle trips, rather than stationary sources (SCAQMD 2008).

As appropriate, analysis of individual future development projects facilitated by the proposed Project must address the applicable threshold based on the SRA, size of the project site, and the proximity of sensitive receptors. Table 4.2-3 presents the LST values for construction within 25 meters of sensitive receptors, the most conservative thresholds.

Table 4.2-3 SCAQMD LSTs for Construction Within 25 Meters of Sensitive Receptors (SRA-7)

	Allowable Emissions (lbs/day)		
Pollutant	**1-Acre Site or less**	**2-Acre Site**	**5-Acre Site**
NO_X	80	114	172
CO	498	786	1,434
PM_{10}	4	7	14
$PM_{2.5}$	3	4	8

Source: SCAQMD 2009

Toxic Air Contaminants

The USEPA considers those pollutants that could cause cancer risks between one in 10,000 (1.0×10^{4}) and one in one million (1.0×10^{-6}) for risk management. SCAQMD recommends the use of this risk level (also reportable as 10 in one million) as the significance threshold for TACs (SCAQMD 2023). SCAQMD also recommends that the non-carcinogenic hazards of TACs should not exceed a hazard index (the summation of the hazard quotients for all chemicals to which an individual would be exposed) of 1.0 for either chronic or acute effects (SCAQMD 2023).

b. Effects Found Not to Be Significant

Threshold 4 was determined to have a less-than-significant impact and, therefore, is discussed under Section 4.19, *Effects Found Not to be Significant* and summarized below.

Construction activities for any future development project under the proposed Project may produce temporary odors from construction related activities, such as unburned hydrocarbons from tailpipes of construction equipment and architectural coatings. However, such odors would disperse rapidly from the respective construction sites and construction would be required to comply with the SCAQMD Rule 402, which regulates nuisance odors. With respect to operation related activities, the Project would not include land uses associated with odor complaints. Therefore, impacts related to odor would be less than significant.

c. Methodology

The terminology and methodology used to evaluate the significance of potential impacts to air quality are described below. In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation. The City uses SCAQMD's *CEQA Air Quality Handbook* (1993) as the guidance document for the environmental review of plans and development proposals within its jurisdiction. The City does not, however, have the specific technical expertise to develop plans, programs, procedures, and methodologies to ensure that air quality will meet federal and State standards. Instead, the City relies upon the expertise of SCAQMD, uses the *CEQA Air Quality Handbook*, and SCAQMD recommended thresholds of significance as the guidance for the environmental review of plans and development proposals. For purposes of this analysis, the *CEQA Guidelines* Appendix G criteria are used, supplemented by the thresholds identified in current SCAQMD guidance.

Air quality impacts resulting from implementation of the proposed Project are assessed at a programmatic level because information on specific developments reasonably anticipated under the proposed Project is not known at this time. SCAQMD *CEQA Air Quality Handbook* states that the air quality assessment should be as comprehensive as possible at a programmatic level. In the absence of SCAQMD programmatic thresholds, this EIR analysis broadly examines temporary construction emissions, long-term operational emissions, and localized pollutant concentrations. Common sources of construction emissions include heavy-duty off-road construction equipment exhaust, fugitive dust, and architectural coatings. Sources of operational emissions include the use of consumer products, motor vehicle trips attracted to or generated by a land use, and on-site combustion of natural gas. A best-effort approach to disclose all reasonably foreseeable impacts based on available information is used consistent with the requirements of CEQA.

Emissions have been calculated based on forecast growth in the City from 2023 baseline conditions through 2035.[5] Interim year calculations have not been conducted because the anticipated timing of land use changes and new development during interim years would be speculative. In general, economic activity tends to vary substantially over the short term with recessions and booms substantially affecting short-term growth. Over the long-term planning horizon, such variations tend to balance out. The City cannot reasonably anticipate whether short-term growth would be linear or sporadic between 2023 and 2035. Given this uncertainty, interim year emissions analyses are unlikely to be a reasonably accurate portrayal of emissions prior to 2035. Furthermore, it is not anticipated that interim year calculations would produce substantially different emission estimates or conclusions regarding the significance of such emissions than presented herein. For these reasons, calculating emissions for interim year scenarios would not provide the public with any more valuable information than what is presented in this EIR.

Construction

Construction emissions were estimated for equipment exhaust emissions and truck trips for a number of example individual construction projects using California Air Pollution Control Officers Association's (CAPCOA) California Emissions Estimator Model (CalEEMod), version 2022.1. Equipment emission factors in CalEEMod are based on CARB data. Equipment was assumed to operate for eight hours per day. Truck emission factors in CalEEMod are from CARB's EMission FACtors 2021 (EMFAC2021), and trucks were assumed to travel 40 miles per day, with a one-way distance of 20 miles to the disposal site. Fugitive dust and architectural coating emissions are qualitatively discussed because it would be speculative to quantify lot acreage and the size of buildings to be coated. These example projects account for four scales of intensity with respect to equipment usage and truck trips, as itemized below.

- Six (6) pieces of heavy-duty equipment and 50 truck trips per day
- Eight (8) pieces of heavy-duty equipment and 100 truck trips per day
- Twelve (12) pieces of heavy-duty equipment and 150 truck trips per day
- Fifteen (15) pieces of heavy-duty equipment and 195 truck trips per day

[5] Based on the traffic study by Fehr and Peers, 2019 is the base year of the City's travel demand model; however, 2023 is used as the baseline year because 2023 was the year when the Notice of Preparation (NOP) was released for the proposed Project. Shifting the VMT baseline from 2019 to 2023 necessitated preparing a modified 2035 scenario reflecting future growth only as approved in the General Plan, the 2021-29 Housing Element, other approved developments, and statewide legislation (e.g., for ADUs), accounting for any duplication between those various plans. Refer to Appendix D for the *Technical Review of Modeling and VMT Methodology for Media District Specific Plan Traffic Study Report*.

These equipment inventories and truck volumes are representative of a reasonable range of construction activity intensity for individual projects based on previous development in Los Angeles. Maximum daily regional and localized emissions were quantified for these construction scenarios and assessed in the context of SCAQMD significance thresholds.

Operation

The proposed Project would establish updated development standards to facilitate the projected development of up to 9,702 residential units and 3,986,207 square feet of commercial and general business development, and 400 hotel rooms.[6] However, the emissions modeling assumed for operation of 10,228 residential units, 600 hotel rooms, 8,546,900 square feet of office and retail use, and 55,800 square feet of school use based on the land use data from Fehr and Peers which include cumulative growth from studio entitlements, kindergarten through 12 grade school enrollment, and accessory dwelling units. Emissions estimates using this data set provide a more conservative analysis. Reasonably anticipated future development projects from the proposed Project would generate mobile source emissions, energy use emissions (natural gas combustion), and area source emissions.

Mobile Sources

Mobile source emissions were estimated using vehicle activity data presented in Section 4.15, *Transportation*, and vehicle emission rates from CARB's EMFAC2021 model. All residential vehicle miles traveled (VMT) growth and employment VMT growth between the baseline (2023) condition and the future (2035) condition were attributed to the proposed Project. As shown in Table 4.2-4, buildout of the existing land use designations would greatly decrease vehicle trips and VMT compared to the 2023 baseline year and per capita VMT would reduce compared to the 2035 No Project scenario.[7]

Table 4.2-4 Vehicle Activity Data (Daily) for the Future With Project Scenario

Activity	Baseline (Specific Plan Area- 2023)	No Project (Specific Plan Area- 2035)	With Project (Specific Plan Area- 2035)
Residential VMT	130,001	241,167	343,134
Residential Vehicle Trips	15,216	27,968	39,960
Residential VMT per capita	11.4	10.6	10.4
Employment VMT	578,579	835,683	877,548
Employment Vehicle Trips	55,389	77,187	81,128
Employment VMT per Employee	13.9	13.3	12.8

VMT = Vehicle Miles Traveled

Source: Fehr & Peers 2025

[6] Modeling assumed operation of 10,228 residential units, 600 hotel rooms, 8,546,900 square feet of office and retail use, and 55,800 square feet of school use based on the preliminary land use data from Fehr and Peers. Emissions estimates using this data set are conservative.

[7] Note that the Fehr & Peers' *Technical Review of Modeling and VMT Methodology for Media District Specific Plan Traffic Study Report* (March 2025 Update) uses Citywide data for the baseline conditions and Specific Plan Area data for the future conditions.

Energy Sources

Energy use emissions were calculated according to the methodology explained in the CalEEMod User Guide, Version 2022.1. The energy use estimates account for the Building Energy Efficiency Standards (Title 24). This is a conservative assumption since the energy use estimates do not account for potential energy efficiency measures required by subsequent Title 24 updates in 2025, 2028, and beyond.

Area Sources

Emissions associated with area sources, including consumer products, landscape maintenance, and architectural coating, were calculated in CalEEMod and utilize standard emission rates from CARB, USEPA, and emission factor values provided by the local air district.

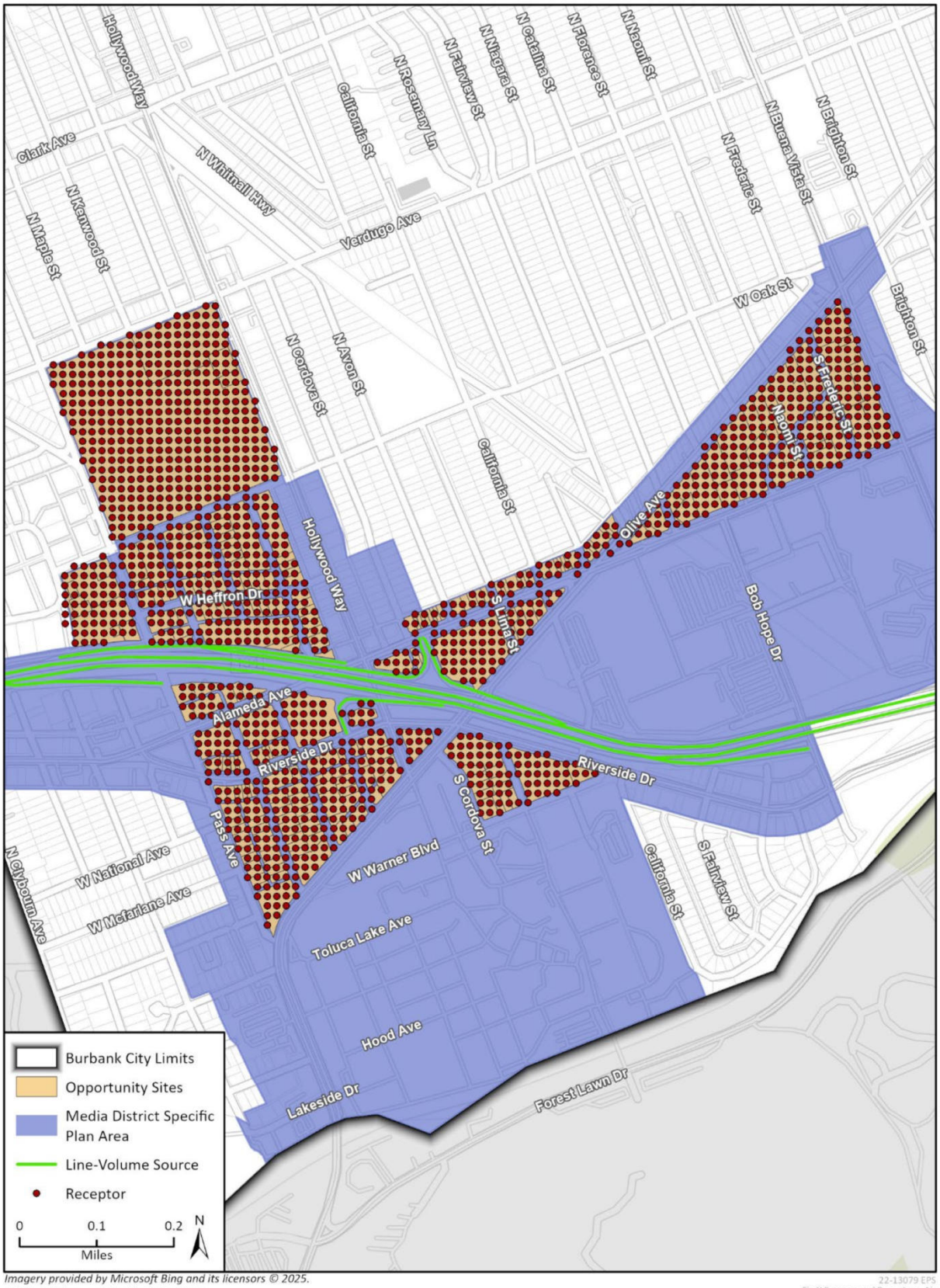
Toxic Air Contaminants

Generally, agencies are not required to analyze the impact of existing environmental conditions on a project's future users or residents, unless the proposed project risks exacerbating those environmental hazards or conditions that already exist. (California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369). However, pursuant to Burbank2035 General Plan Program AQCC-4, *Health Risk Assessments for Stationary and Mobile Sources*, a health risk assessment (HRA) was prepared to evaluate potential impacts associated with emissions of existing sources of TACs in proximity to the proposed residential developments under the proposed Project. The HRA evaluated TAC emissions from State Route 134 (SR-134) and nearby on and off ramps. Emissions from vehicles on the SR-134 are a source of TACs.

Air dispersion modeling was completed using the American Meteorological Society/USEPA Regulatory Model (AERMOD). AERMOD provides X/Q (CHI/Q = chi/q = χ/q) values, which are the concentrations estimated by the air quality model based on an emission rate of one gram per second. The same AERMOD computations for area sources are used for line sources. To account for the urban heat island effect, the AERMOD urban option was used with the 2010 United States Census Bureau Los Angeles County population of 9,818,605 (SCAQMD 2025). Specific meteorology and terrain for the site were also included in the model using the nearest available meteorological data set for the Hollywood Burbank Airport (located approximately three miles northwest of the Project site) and United States Geological Survey Digital Elevation Model data for Burbank quadrangle (30 by 30-meter resolution). Additionally, the presence of buildings and other structures disturbs downwind air flow. Building downwash, which is a plume transport and dispersion phenomenon that accounts for the disturbance from building on downwind air flow, is only calculated for point sources. Therefore, the roadway line-volume sources for the SR-134 did not include building downwash.

Health risk calculations in CARB's Hotspots Analysis and Reporting Program version 2 (HARP 2) were used to determined carcinogenic and non-carcinogenic health risks at the locations of residential developments proposed under the Project within approximately 500 feet of the sources analyzed. The sensitive receptors were assumed to all be individual residences. Receptors located farther away from these locations would have reduced health risk impacts, as concentrations would be further reduced with increasing distance (CARB 2005). Sensitive receptors associated with the housing development under the Project were modeled based on estimated building footprints. Figure 4.2-1 shows location of the opportunity sites.

Figure 4.2-1 Air Dispersion Modeling Sources and Receptors



Mobile Source Emissions

The traffic volume for the SR-134 and associated the ramps were based on the California Department of Transportation (Caltrans) 2022 Traffic Volumes on California State Highways, 2022 Truck Traffic: Annual Average Daily Truck Traffic, and 2022 Ramp Volumes on the California State Freeway System District 7 (Caltrans 2025). The year 2022 is the most recent year for which freeway traffic data are available from these sources. Based on the average of the Ahead and Behind 2022 traffic counts, the annual average daily traffic (AADT) volume along the nearest segment of SR-134 is approximately 168,000 vehicles.[8] A total of nine ramps were identified for inclusion in the HRA. See Appendix B for a full list of the AADTs used on the ramps. The segments of SR-134 within half a mile and the ramps within 500 feet of the opportunity sites were modeled as a series of volume sources in AERMOD.

Mobile source TACs associated with vehicle traffic on SR-134 and associated on- and off-ramps within 500 feet of the opportunity sites were estimated based on the methodology developed by the University of California Davis (UC Davis)- Caltrans *Air Quality Project, Estimating Mobile Source Air Toxics Emissions [MSAT]: A Step-By-Step Project Analysis Methodology* (Caltrans 2006). This spreadsheet application was designed to generate the total amount of the six pollutants of concern above, based on total organic gases emission factors and diesel particulate emission factors from CARB's EMission FACtors 2021 (EMFAC2021). Emission factors for the buildout year 2035 were used for the HRA. The UC Davis-Caltrans spreadsheet contained speciation factors from the CARB, and the USEPA's Motor Vehicle Emission Simulator (USEPA 2025i) was used to supplement missing values for acrolein. These emission and speciation factors were then multiplied against traffic volumes for the mainline and ramp segments to obtain total emissions from SR-134 mainlines within one-half mile of the opportunity sites and from associated freeway on- and off-ramps within 500 feet of the opportunity sites. Emission factors for this study were based on grams per mile. Spreadsheet outputs adapted from the UC Davis-Caltrans MSAT model and composite emission rates are included in Appendix B.

For mainline emissions, emission factors were reviewed for speeds between 50 and 65 miles per hour (mph) based on the posted speed limits. On SR-134, the worst reasonable case speed for diesel PM emissions (i.e., highest emission levels) was 65 mph for heavy duty and light duty trucks. For total organic gases emissions (TOG), the worst reasonable speed was 50 mph for heavy-duty trucks traveling on SR-134 and 65 mph for light duty trucks and passenger vehicles. All entrance ramp segments were modeled using emissions factors based on a speed of 50 mph. Exit ramp segments were modeled based on the posted speed limits of 35 mph. Figure 4.2-1 shows the sources and receptors for SR-134.

Health Risk Modeling

Version 22118 of the HARP 2 program was used to calculate the potential risk values associated with the worst case one-hour and average annual toxic emission concentrations at surrounding receptors. SCAQMD mandatory minimum pathways were used. Table 4.2-5 lists the inputs for the risk scenario and for specific pathways, which are consistent with SCAQMD guidance.

[8] Back AADT, Peak Month, and Peak Hour usually represents traffic South or West of the count location. Ahead AADT, Peak Month, and Peak Hour usually represents traffic North or East of the count location (Caltrans 2025).

Table 4.2-5 HARP 2 Risk Inputs for Carcinogenic and Non-carcinogenic Risks

HARP 2 Inputs	Setting
Carcinogenic Risk	Individual residents, 30-year exposure duration, Risk Management Policy using the Derived Method
Non-Carcinogenic Risk: Chronic Risk	Individual resident, OEHHA Derived Method
Deposition Velocity	0.02 meters per second
Fraction of Time at Residences	Fraction of time applied for age bins greater than 16 years
Dermal	Warm Climate

Source: SCAQMD 2025

In addition, the reasonably foreseeable development under the proposed Project would be required to include minimum efficiency reporting value (MERV) 13 filters in the building ventilation systems, pursuant to the 2022 California Energy Code Subchapter 3, Section 120.1(c) and Subchapter 10, Section 160.2(c). The analysis accounts for the inclusion of MERV 13 filters, which remove approximately 90 percent of diesel PM from the intake air (USEPA 2025j). Section 120.1(c)(1)(B) of the California Energy Commission's 2022 Building Energy Efficiency Standards requires that MERV 13 efficiency standards for particle sizes of 1.0 – 3.0 µm range (i.e., the size range for DPM) shall meet or exceed 85 percent efficiency. The cancer risks from all three sources were adjusted post-model to account for the reduction from MERV 13 filters, assuming an 85 percent reduction to DPM contributions to health risk impacts.[9]

Threshold 1: Would the project conflict with or obstruct implementation of the applicable air quality plan?

Impact AQ-1 DEVELOPMENT UNDER THE PROPOSED PROJECT WOULD EXCEED THE PLANNED GROWTH UNDER THE BURBANK2035 GENERAL PLAN AND SCAG'S 2024-2050 RTP/SCS. IN ADDITION, THE PROPOSED PROJECT WOULD RESULT IN SIGNIFICANT INDIRECT IMPACTS DUE TO POPULATION GROWTH. THE PROPOSED PROJECT WOULD, THEREFORE, CONFLICT WITH THE GROWTH ASSUMPTIONS OR POLICIES OF APPLICABLE AIR QUALITY PLANS SUCH AS SCAQMD'S 2022 AQMP. IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

As discussed in Section 4.2.1, *Setting*, the SCAB is designated a non-attainment area for the federal and State one-hour and eight-hour O_3 standards, the State PM_{10} standards, and the federal and State annual $PM_{2.5}$ standard. A project may be inconsistent with the AQMP if it would generate substantial population, housing, or employment growth that exceeds forecasts used in the development of the AQMP or if the project is inconsistent with applicable AQMP control measures. The 2022 AQMP, the most recent AQMP adopted by the SCAQMD, incorporates local city general plans and the Southern California Association of Governments (SCAG)'s 2020 RTP/SCS socioeconomic forecast projections of regional population, housing, and employment growth (SCAQMD 2022, SCAG 2020). [10]

SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, 12.3 of the SCAQMD CEQA Air Quality Handbook. These criteria are as follows (SCAQMD 1993):

[9] Contributions to other non-DPM toxic air contaminants were assumed to not observe reductions from MERV filtration.
[10] On April 4, 2024, SCAG's Regional Council formally adopted the 2024-2050 RTP/SCS (titled Connect SoCal 2024). However, the SIPs were adopted prior to this date and relies on the demographic and growth forecasts of the 2020-2045 RTP/SCS; therefore, these forecasts are utilized in the analysis of the project's consistency with the AQMP.

- **Criterion 1:** Whether the project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- **Criterion 2:** Whether the project will exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Criterion 1

To address the first criterion, four sample construction scenarios have been modeled and results may be found in Table 4.2-6 below. While these scenarios in particular would not result in emissions that exceed the SCAQMD regional thresholds, construction of individual projects under the proposed Project would continue to have the potential to exceed SCAQMD regional thresholds, especially for projects with large amounts of soil movement or a large quantity of workers or equipment. In addition, an operational scenario upon buildout of the proposed Project was also modeled and results may be found in Table 4.2-7 below. Operation of the developments facilitated by the proposed Project would generate criteria air pollutant emissions associated with area sources (e.g., fireplaces, architectural coatings, consumer products, and landscaping equipment), energy sources (e.g., use of natural gas for space and water heating and cooking), and mobile sources (e.g., vehicle trips to and from the project site). Emissions associated with future development projects under the proposed Project, depending on project type and size, could exceed project-specific thresholds established by SCAQMD. However, such projects would be required to undergo independent, project-level CEQA review and include mitigation measures, if necessary, to address potentially significant impacts. Therefore, as the proposed Project has the potential to cause or contribute to new violations, the proposed Project would be inconsistent with Criterion 1 and impacts would be potentially significant.

Criterion 2

CONSISTENCY WITH AQMP GROWTH FORECASTS

Consistent with State housing element law, the purpose of the proposed Project is to accommodate the development of adequate housing to meet housing needs associated with most recent SCAG forecasts of regional growth. As further detailed in Section 4.12, *Population and Housing,* of this EIR, the 2024-2050 SCAG RTP/SCS forecast 48,600 units in Burbank in 2035. The proposed Project would introduce 9,702 housing units to the 2024 City housing supply of 46,457 housing units, resulting in a new total housing supply of 56,159. Based on these projections, the proposed Project would exceed SCAG's 2035 housing forecast by 7,559 units. Therefore, the proposed Project would also result in housing growth in comparison to SCAG's RTP/SCS, which would result in a potentially significant impact associated with population growth.

Although development under the proposed Project would exceed the SCAG's forecasted housing growth, the overall vision of the proposed Project (refer to Chapter 5, *Vision and Overarching Goals*) is to address current issues facing the Specific Plan Area, such as housing supply and affordability, transportation infrastructure, and safety, by encouraging contextual transit-oriented development in the center of the Specific Plan Area around existing and future transit opportunities. In addition, the proposed Project would guide land use and development decisions through the objective design standards and implementation strategies. The proposed Project also includes infrastructure goals and policies to ensure that development under the proposed Project would be accommodated. As such, the overall purpose of the proposed Project is to identify areas for development in the Specific Plan Area and provide the means to accommodate the growth. Therefore, future development under the

proposed Project would not result in unplanned population and housing growth and impacts would be less than significant.

CONSISTENCY WITH AQMP CONTROL MEASURES

Consistency with the 2022 AQMP is also a function of consistency with applicable AQMP control measures. The AQMP includes specific control measures to reduce air pollutant emissions in order to meet federal and State air quality standards. One of the most important methods the AQMP relies on to achieve its goals is the use of Transportation Control Measures (TCM). TCMs are defined in the 2022 AQMP as "SIP-committed transportation programs and projects that reduce vehicle use or change traffic flow or congestion conditions for the purposes of reducing emissions from transportation sources and improving air quality." The TCMs included in the 2022 AQMP are described in the 2020-2045 RTP/SCS. Revised and updated TCMs are also included in the 2024-2050 RTP/SCS, which was adopted after the 2022 AQMP. Additional control measures are directed for residential and commercial land uses, which are in line with California's aggressive climate goals for greenhouse gas (GHG) emissions reductions, which can also help reduce NO_x emissions.

Growth under the proposed Project would be concentrated in locations where a majority of the Specific Plan Area is within a transit priority area (TPA) under the 2020-2045 RTP/SCS. TPA refers to an area within one-half mile of a major transit stop that is existing or planned. By focusing future development in areas with existing transit infrastructure, the proposed Project would minimize growth in undeveloped parts of Burbank, helping to reduce reliance on automotive travel, VMT, and associated emissions (SCAG 2020). Therefore, the proposed Project would not conflict with the implementation of control measures from the AQMP and would include policies to further reduce air pollutant emissions through promoting transportation and land use design factors; therefore, potential impacts associated with the implementation of AQMP control measures would be less than significant.

Mitigation Measures

The proposed Project would be inconsistent with Criterion 1. No mitigation measures are available to reduce the significant impacts related to conflicts with the AQMP.

Significance After Mitigation

Because the scope of future construction projects is yet to be determined, there are no mitigation measures available to reduce the significant impacts related to address Criterion 1. Impacts would remain significant and unavoidable.

Determination

Significant and unavoidable

Threshold 2:	Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Impact AQ-2 CONSTRUCTION ACTIVITIES AND OPERATION OF DEVELOPMENT UNDER THE PROPOSED PROJECT WOULD RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE REGION IS A NON-ATTAINMENT AREA UNDER APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARDS. AIR QUALITY STUDIES AND PROJECT-SPECIFIC EMISSIONS REDUCTION MEASURES WOULD BE REQUIRED FOR LARGE PROJECTS PROPOSED UNDER THE PROPOSED PROJECT. IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

As discussed under Section 4.2.1, *Setting*, criteria pollutants include O_3, CO, NO_2, PM_{10}, $PM_{2.5}$, sulfur dioxide, and lead. The SCAB is a non-attainment area for the federal standards for O_3 and $PM_{2.5}$ and the State standards for O_3, PM_{10}, and $PM_{2.5}$. The Los Angeles County portion of the SCAB is also designated non-attainment for lead (SCAQMD 2022). The SCAB is designated unclassifiable or in attainment for all other federal and State standards.

Residential, hotel, and commercial development facilitated by the proposed Project would generate short-term air pollutant emissions associated with use of heavy-duty construction equipment; truck trips hauling debris, soils, and construction materials; and fugitive dust from demolition and grading. Additionally, long-term air pollutant emissions would result from mobile sources (i.e., motor vehicle exhaust), energy use (i.e., natural gas combustion), stationary sources (e.g., emergency generators, fire pumps, and boilers) and area sources (e.g., hearths, landscaping equipment, consumer products, and architectural coatings).

Construction Emissions

The extent of daily emissions, particularly NO_X emissions, generated by construction equipment, would depend on the equipment used and the hours of operation for each project. The extent of $PM_{2.5}$ and PM_{10} emissions would depend upon the following factors: 1) the amount of disturbed soils; 2) the length of disturbance time; 3) whether existing structures are demolished; 4) whether excavation is involved; and 5) whether transporting excavated materials off-site is necessary. The extent of VOC emissions would primarily depend on the square footage of buildings being painted and asphalt surfaces being paved each day.[11]

As discussed in Section 4.2.3.a, *Thresholds of Significance*, SCAQMD has not established plan-level significance thresholds for construction air pollutant emissions. Given the programmatic nature of the proposed Project, sufficient detail (e.g., construction schedule, amount of soil export, specific buildout parameters) of future development projects facilitated by the proposed Specific Plan is not available to perform project-level analysis. Thus, it would be speculative to analyze project-level impacts. However, Table 4.2-6 shows the estimated average daily construction emissions associated with the four sample construction activity scenarios described under Methodology. These scenarios are representative of construction activity intensities for future development projects under the proposed Specific Plan.

Results of the emissions modeling demonstrate that daily emissions of NO_X from heavy-duty diesel equipment and trucks during construction activities would approach but not exceed SCAQMD regional thresholds under reasonably expected circumstances for projects that involve the use of

[11] The proposed Project does not include any stationary sources of lead emissions and would not generate substantial sources of hydrogen sulfide, vinyl chloride, or visibility reducing particles. Therefore, these pollutants are not discussed further in this analysis.

15 pieces of equipment and 195 heavy truck trips per day. However, projects with large amounts of soil import/export or smaller projects with a large quantity of workers may result in larger emissions than those analyzed in Table 4.2-6 and have the potential to exceed SCAQMD regional thresholds. Therefore, construction activity accommodated under the proposed Project would result in a significant impact related to regional construction emissions of NO_X. The impact includes potential exposure of sensitive receptors to high concentrations of NO_2, which may result in adverse health effects, such as breathing difficulties.

Table 4.2-6 Construction Scenarios – Daily Emissions

	Pounds per Day					
Example Scenarios – Daily Activity[1]	**VOC[2]**	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
6 Heavy-Duty Equipment, 50 Truck Trips	13	35	32	<1	22	12
8 Heavy-Duty Equipment, 100 Truck Trips	14	51	46	<1	31	16
12 Heavy-Duty Equipment, 150 Truck Trips	15	76	70	<1	46	24
15 Heavy-Duty Equipment, 195 Truck Trips	15	99	89	<1	61	32
Regional Significance Threshold	75	100	550	150	150	55
Threshold Exceedance?	**No**	**No**	**No**	**No**	**No**	**No**

[1] Equipment exhaust was estimated using CalEEMod and 8 hours of operation per day. Truck emissions were estimated using CalEEMod and a trip length of 20 miles.

[2] Includes application of architectural coatings; however, maximum daily VOC emissions may vary greatly, depending on the area of coating applied in a given day.

Source: See Appendix C for modeling results and assumptions.

Although not reflected in Table 4.2-6, maximum daily VOC emissions may vary greatly depending on the area of coatings applied in a given duration; and as such, even smaller projects may have potential to exceed SCAQMD regional thresholds. [12]Health effects of VOCs may include eye, nose, throat irritation, headaches, loss of coordination, nausea, damage to liver, kidney, and central nervous system. SCAQMD has also established Rules 1113 and 1186 that limit VOC content in architectural coating applications, which are intended to substantially reduce the likelihood that off-gassing emissions from painting, finishing, and paving activities would exceed SCAQMD air quality significance thresholds.

Future development projects under the proposed Project would be subject to compliance with applicable SCAQMD rules, including Rule 401 (Visible Emissions), Rule 402 (Nuisance), Rule 403 (Fugitive Dust), and Rule 1113 (Architectural Coatings). Specifically, Rule 403 requires the use of best available control measures for all construction activities to reduce fugitive dust emissions. The major construction elements addressed by Rule 403 include earth moving, disturbed surface areas, unpaved roads, open storage piles, demolition, and other various construction activities. Rule 403 compliance by individual property owners, developers, and/or contractors would reduce temporary construction-related air pollutant emissions of fugitive dust. Furthermore, the following policies from the Burbank2035 General Plan Air Quality and Climate Change Element aim to reduce air quality impacts associated with construction activities:

[12] For the purposes of this analysis, all construction scenarios assumed construction of 9,600-square feet of mid-rise apartment space and an architectural coating duration of 5 days. It is possible that a small project can exceed thresholds based on a variety of factors, including a longer duration of architectural coating (i.e., greater number of hours per day) or a larger surface area (i.e., greater than 9,600-square feet) painted.

Policy 1.5 Require projects that generate potentially significant levels of air pollutants, such as landfill operations or large construction projects, to incorporate best available air quality and greenhouse gas mitigation in project design.

Policy 1.6 Require measures to control air pollutant emissions at construction sites and during soil-disturbing or dust-generating activities (i.e., tilling, landscaping) for projects requiring such activities.

Compliance with SCAQMD rules and Burbank2035 General Plan Air Quality and Climate Change Element policies would reduce the overall level of air quality impacts associated with construction activities facilitated by the proposed Project. Moreover, any future development projects facilitated by the proposed Project would be required to implement additional mitigation if the project-specific analysis identifies a potential to exceed SCAQMD's regional thresholds construction activities. Nonetheless, future development projects with large amounts of equipment, large number of hauling truck trips, or other unusual circumstances may generate criteria pollutant emissions that exceed SCAQMD thresholds. Therefore, construction-related impacts associated with large future development projects under the proposed Project are considered potentially significant.

Operation

The emissions analysis related to the operation of future development projects under the proposed Project was developed based on land uses consistent with the Fehr & Peers *Technical Review of Modeling and VMT Methodology for Media District Specific Plan Traffic Study Report (March 2025 Update).* Table 4.2-7 shows the estimated average daily operational emissions associated with the buildout of the proposed Project.

Table 4.2-7 Operational Emissions under the Proposed Project

	Daily Emissions (pounds/day)					
Scenario	**VOC**	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Mobile Sources	229	165	2,023	6	589	151
Area Sources	580	153	1,057	1	13	12
Energy Sources	4	64	39	<1	5	5
Total	**813**	**373**	**3,119**	**7**	**606**	**169**
SCAQMD Regional Significance Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**Yes**	**Yes**	**Yes**	**No**	**No**	**No**

Note: Numbers may not add up due to rounding.

Source: See Appendix C for modeling results and assumptions.

As shown above, the buildout of the proposed Project would generate criteria pollutants that exceed SCAQMD operational regional significance thresholds. As SCAQMD regional significance thresholds are intended for assessment of individual development projects, comparison of criteria pollutant emissions from buildout of all future development projects under the proposed Project to their respective thresholds is conservative.

Additional modeling was performed to determine the largest individual project sizes that would typically be anticipated to result in emissions that do not exceed SCAQMD thresholds. Through iterative modeling, it was determined that operation of a 180-multi-family unit project or office space of 900,000 square feet would typically result in emissions that approach but remain less than

SCAQMD thresholds (Appendix C). However, future development projects that are larger than those identified above or have a mix of land uses may generate criteria pollutant emissions that exceed SCAQMD thresholds. Therefore, operational-related impacts associated with large future development projects under the proposed Project are considered potentially significant.

Mitigation Measures

The following mitigation measures would address construction and operational emissions associated with future development projects under the proposed Project that are larger than those analyzed above:

AQ-1 Construction Emissions Reduction

For projects that would include any of the following: demolition of more 13,500 square feet of building area, greater than 5,000 cubic yards of soil cut/fill, greater than five acres of graded area, or use of more than 15 pieces of heavy-duty construction equipment and 195 truck trips on any given day during demolition, site clearing, or grading, as part of the Plan Check Submittal, and at the expense of the Project applicant, the City shall retain a qualified air quality technical specialist to prepare an air quality impact analysis to analyze construction emissions. The air quality analysis shall demonstrate that project emissions are less than the applicable regional thresholds and Localized Significance Thresholds under the South Coast Air Quality Management District (SCAQMD) and, as applicable, may include, but not be limited to, the following mitigation measures:

- Off-road diesel-powered construction equipment greater than 50 horsepower shall meet the United States Environmental Protection Agency's Tier 4 emission standards, where available. In the event that Tier 4 engines are not available for any off-road equipment larger than 100 horsepower, that equipment shall be equipped with a Tier 3 engine or an engine that is equipped with retrofit controls to reduce exhaust emissions of nitrogen oxides (NO_x) and diesel particulate matter (DPM) to no more than Tier 3 levels unless certified by engine manufacturers or the onsite air quality construction mitigation manager that the use of such devices is not practical for specific engine types. This will be achieved as part of the finalization of a construction management plan.
- All construction equipment shall be outfitted with best available control technology (BACT) devices certified by California Air Resources Board (CARB). Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- Consistent with SCAQMD Rule 403, construction contractors shall identify and implement best available dust control measures during active construction operations capable of generating dust.

AQ-2 Operational Emissions Reduction

For any project that would include more than 180 multi-family residential units, 900,000 square feet of office space, or any equivalent combination thereof, as part of the Plan Check Submittal, and at the expense of the Project applicant, the City shall retain a qualified air quality technical specialist to prepare an air quality impact analysis to analyze operational emissions. The air quality analysis shall demonstrate that project emissions are less than applicable SCAQMD regional and LST thresholds and, as applicable, may include, but not be limited to, the following mitigation measures:

- Implementation of a Transportation Demand Management Plan.
  - Installation of electric vehicle charging stations
  - Public infrastructure improvements (e.g., bus stop shelter improvements)
  - Carpool or ridesharing programs
  - Subsidized transit costs
  - Unbundled parking costs
  - Bicycle amenities (storage, showers, lockers, etc.)
- Use of all-electric appliances (i.e., elimination of natural gas service)
- Use solar or low emission water heaters that exceed Title 24 requirements
- Increased walls and attic insulation beyond Title 24 requirements
- Required use of electric lawnmowers, leaf-blowers, and chainsaws

Significance After Mitigation

Mitigation Measure AQ-1 would require air quality analysis and appropriate emissions reduction measures for projects that exceed the screening criteria, such as those with extensive grading, demolition, or other activities requiring soil disturbance, consistent with SCAQMD Rule 403. Additionally, projects with large amounts of heavy-duty construction equipment would require an air quality analysis and appropriate mitigation. As shown in Table 4.2-6, the criterion for the maximum number of pieces of heavy-duty construction equipment conservatively correlates to the applicable SCAQMD threshold. In addition, subsequent analysis and mitigation would be required for any project with reasonable potential to generate criteria pollutant emissions that exceed SCAQMD thresholds. However, specific reduction in emissions below the SCAQMD significance thresholds cannot be demonstrated in the absence of specific project details to assess. It is reasonable to assume that construction activities for a development project under the proposed Project could generate emissions that would exceed the significance thresholds despite Mitigation Measure AQ-1. Therefore, the proposed Project is considered to result in a significant and unavoidable regional and localized construction impact related to violating an air quality standard and/or contributing substantially to an existing or projected air quality violation. Construction impacts would be significant and unavoidable.

Mitigation Measure AQ-2 would require air quality analysis and appropriate air pollutant emissions reduction measures for projects that exceed the screening criteria identified above for large projects. While implementation of Mitigation Measure AQ-2 would reduce air pollutant emissions associated with development under the proposed Project, there would be no further feasible mitigation to reduce VOC, NO_x and CO to reduce these long-term emissions to a level below SCAQMD significance thresholds. Therefore, impacts from operational emissions would be significant and unavoidable.[13] However, because the construction and operation mitigation measures would be specific to a proposed project and aimed at reducing emissions, it is not anticipated that any secondary environmental impacts related to emissions would occur.

Determination

Significant and unavoidable

[13] SCAQMD regional significance thresholds are intended for assessment of individual development projects. Therefore, comparison of criteria pollutant emissions from buildout of all future development projects under the proposed Project to their respective thresholds is conservative.

Threshold 3: Would the project expose sensitive receptors to substantial pollutant concentrations?

Impact AQ-3 FUTURE DEVELOPMENT PROJECTS UNDER THE PROPOSED PROJECT WOULD POTENTIALLY EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS. IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

Localized Emissions

SCAQMD has also developed specific LSTs to assess construction and operational air quality impacts associated with individual development projects. The LST values are specific to the SRA in which an individual project is located and based on proximity to the nearest sensitive receptor(s). Table 4.2-3 presents the construction LST values for SRA 7 within 25 meters of sensitive receptors, the most conservative thresholds.

A localized construction analysis would be speculative given the lack of specific information identifying exact locations and construction activities for future development under the proposed Project. In addition, each individual project would vary in size and distance to sensitive receptors, which affects the applicable threshold each individual project would be tied to for on-site emissions during operations. Thus, construction and operational LST emissions were not quantified in this analysis since project-level data was not included for the proposed Project. However, it is reasonable to assume that some individual projects developed under the proposed Project would involve construction adjacent to sensitive receptors (e.g., residences and schools). Under certain circumstances, unmitigated equipment emissions combined with fugitive dust emissions associated with the development of future development occurring under the proposed Project could potentially exceed the LSTs for NO_X, CO, PM_{10} and $PM_{2.5}$. As such, development of individual projects under the proposed Project could result in a potentially significant impact related to localized construction and operational emissions of NO_X, CO, PM_{10}, and $PM_{2.5}$

Carbon Monoxide Hotspots

A CO hotspot is a localized concentration of CO that is above a CO ambient air quality standard; elevated CO levels can occur at roadway intersections that experience high traffic volumes and severe vehicle congestion. Historically, mobile source-related CO concentrations at high-volume (e.g., congested) intersections have been linked to health concerns according to USEPA and SCAQMD.

However, CO attainment in the SCAB was demonstrated in the 2003 AQMP, and the region has remained in attainment of CO standards ever since. According to the 2004 Revision to the California State Implementation Plan for Carbon Monoxide, requirements for cleaner vehicles, equipment, and fuels have cut peak CO levels in half since 1980 despite growth (CARB 2004). With cleaner technologies, automobile emissions of CO have steadily declined over the years.

A detailed CO analysis was conducted during the preparation of SCAQMD's 2003 AQMP. The locations selected for microscale modeling in the 2003 AQMP included high average daily traffic (ADT) intersections in the SCAB, those which would be expected to experience the highest CO concentrations. The highest CO concentration observed was at the intersection of Wilshire Boulevard and Veteran Avenue in West Los Angeles and near Interstate 405. The concentration of CO at this intersection was 4.6 ppm, which is well below the State and federal standards. The Wilshire Boulevard/Veteran Avenue intersection had an ADT of approximately 100,000 vehicles per day. The 2003 1-hour concentration for this intersection was 4.6 ppm, which indicates that the most stringent

1-hour CO standard (20.0 ppm) would likely not be exceeded until the daily traffic at the intersection exceeded more than 400,000 vehicles per day (SCAQMD 2003a).

Based on traffic volumes documented in Fehr & Peer's *Technical Review of Modeling and VMT Methodology for Media District Specific Plan Traffic Study Report* (see Appendix H), any single intersectional volume in the Specific Plan Area is not expected to approach anywhere near 400,000 vehicles per day. Furthermore, the City does not have any intersections that would foreseeably experience daily volumes exceeding 400,000 vehicles per day. Therefore, the buildout of the proposed Project would not have potential to contribute to localized CO concentrations at intersections that exceed State CO standards.

Toxic Air Contaminants

TACs are defined by California law as air pollutants that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. The following subsections discuss the Project's potential to result in impacts related to TAC emissions during construction and operation.

Construction

Construction would result in various TACs associated with equipment exhaust and off-gassing from various materials applied during construction, such as architectural coatings. Of these, the TAC of primary concern associated with construction activities is diesel particulate matter (DPM), which may be released in substantial quantities by use of heavy-duty equipment operations and truck traffic. Although health risks associated with acute exposure to diesel exhaust are negligible, chronic exposure may contribute to carcinogenic and non-carcinogenic health risks to the respiratory system. The severity of health effects depends upon several factors, including the amount of exposure and the duration of exposure.

The specific locations, amount of heavy-equipment use, and duration of construction activity resulting from the proposed Project are not currently known. Health risks associated with construction-related diesel exhaust emissions would only have potential to result in significant health risks for large projects with substantial heavy equipment use for a period of several years in proximity to sensitive receptors.

Based on a review of project environmental documents for development projects recently analyzed in the City, only extremely large projects would have the potential to result in significant impacts with regards to TACs. For example, the Replacement Airline Passenger Terminal at Burbank Bob Hope Airport Project involved approximately 42 months of intensive construction, 327.5 acres of grading, and the export of 130,000 cubic yards of soil. Nonetheless, the EIR determined that potential exposure at the maximally exposed residential receptor would be 4.6 in one million and would not exceed the threshold of 10 in one million (Burbank-Glendale-Pasadena Airport Authority 2016). Typical development accommodated under the proposed Project would be less intense than this example project.

Future development projects would be required to implement compliance measures for California Off-Road Diesel-Fueled Fleet Regulations and idling limits for diesel-fueled vehicles, which would reduce potential diesel exhaust emissions from construction. Entitlements for large projects are typically subject to discretionary approvals, and subsequent air quality analysis is required pursuant to CEQA to demonstrate that projects would not result in air quality impacts at nearby receptors. Mitigation Measure AQ-1 would require air quality analysis and appropriate air pollutant emissions

reduction measures for projects with potential for construction to include activities that generate substantial diesel exhaust, such as demolition, grading, hauling, of heavy-duty equipment use. However, specific reduction in emissions below the SCAQMD significance thresholds cannot be demonstrated in the absence of individual project details. For these reasons, construction-related impacts associated with TAC emissions would be potentially significant.

Operation

Residential, commercial, hotel, and office land uses analyzed under the proposed Project are not considered land uses that generate substantial TAC emissions based on review of the air toxic sources listed in SCAQMD's and CARB's guidelines. It is expected that quantities of hazardous TACs generated on-site (e.g., cleaning solvents, paints, landscape pesticides, etc.) for the types of proposed residential land uses would be below thresholds warranting further study under the California Accidental Release Program. Because future development projects under the proposed Project would not include substantial TAC sources and is consistent with CARB and SCAQMD guidelines, future development projects are not anticipated to result in the exposure of off-site sensitive receptors to significant amounts of carcinogenic contaminants or TACs. Impacts would be less than significant.

On-Site Sensitive Receptors

Reasonably foreseeable development under the proposed Project would add new sensitive receptors in Burbank. Although new residences would not exacerbate health risks related to TACs, they could be exposed to such health risks. Such exposure does not constitute a potential significant impact under CEQA, but the potential risks are provided for informational purposes. An HRA was prepared to assess the potential health effects associated with TAC emissions from SR-134 and associated ramps. For the roadways, the primary concern is the effect of diesel PM on the on-site sensitive receptors combined with the other vehicle exhaust pollutants.

Cancer risk is expressed as the maximum number of new cases of cancer projected to occur in a population of one million people due to exposure to the cancer-causing substance, typically over a specific exposure duration, such as the high-end residency (95th percentile) of 30 years (SCAQMD 2017). For example, a cancer risk of one in one million means that in a population of one million people, not more than one additional person would be expected to develop cancer as the result of the exposure to the substance causing that risk.

An analysis using the USEPA's AERMOD dispersion model and CARB's Hotspots Analysis and Reporting Program (HARP) risk analysis tool was used to determine the maximally exposed individual receptors (MEIR) for SR-134. The 30-year excess cancer risk, potential acute and chronic (such as lung inflammation, immune suppression, and immune sensitization) health risks for on-site residential units were calculated. The MEIR is located adjacent to SR-134 just to the west of North Pass Avenue.

The MEIR assumes the application of MERV filtration is applied to the contribution of health risk impacts from diesel particulate matter.[14] The siting of the freeway-adjacent receptors is very conservative. Specific residential designs and unit locations at the opportunity sites are not yet known, and it is possible that site plans would be designed to result in less impacts than those presented in the table below. With the application of MERV 13 filtration (particularly for sites within 500 feet of SR-134), the cancer and hazard quotient values (chronic and acute hazard risk) do not exceed SCAQMD thresholds of 10 in one million and 1.0, respectively, as shown in Table 4.2-8.

[14] According to Section 120.1(c)(1)(B) of the California Energy Commission's 2022 Building Energy Efficiency Standards, MERV 13 efficiency standards for particle sizes of 1.0 – 3.0 µm range (i.e., the size range for DPM) shall meet or exceed 85 percent efficiency.

Table 4.2-8 Potential Health Risks from SR-134 at the MEIR

	Maximum Exposed Individual Resident (MEIR)[1]
Cancer Risk	
Incremental Excess Cancer Risk[2]	4.8 in one million
Threshold	*10 in one million*
Threshold Exceeded?	**No**
Chronic Risk	
Chronic Hazard Index[3]	<0.1
Threshold	*1.0*
Threshold Exceeded?	**No**
Acute Risk	
Acute Hazard Index[2]	<0.1
Threshold	*1.0*
Threshold Exceeded?	**No**

[1] Based on 30-year resident exposure.

[2] The MEIR for cancer and acute risk is located north of SR-134 (at 375901.57 meters east and 3780098.41 meters north).

[3] For chronic risk, the MEIR is located north of SR-134 (at 376531.54 meters east and 3780031.21 meters north).

Note: Coordinates for the MEIR location are provided in Universal Transverse Mercator coordinates and are in meters. See Appendix B for the HRA modeling outputs.

Mitigation Measures

Implementation of Mitigation Measure AQ-1 would address construction TAC emissions associated with future development projects under the proposed Project.

Significance After Mitigation

Mitigation Measure AQ-1 would require air quality analysis and appropriate emissions reduction measures for projects that exceed the screening criteria, such as those with extensive grading, demolition, or other activities requiring soil disturbance, consistent with SCAQMD Rule 403. Specifically for health risk from TAC emissions during construction, the requirement for Tier 4 equipment would result in a substantial reduction of TAC emissions. However, specific reduction in TAC emissions below the SCAQMD health risk significance thresholds cannot be demonstrated in the absence of specific project details to assess. It is reasonable to assume that construction activities for a development project under the proposed Project could generate TAC emissions that would exceed the significance thresholds despite Mitigation Measure AQ-1. Therefore, the proposed Project would potentially expose sensitive receptors to substantial pollutant concentrations during construction and impacts would be significant and unavoidable.

Determination

Significant and unavoidable

4.2.4 Cumulative Impacts

Cumulative projects would include any reasonably anticipated development in the SCAB for regional air quality impacts, as well as development accommodated under the proposed Project for localized air quality impacts. Development that is considered part of the cumulative analysis includes buildout of the Burbank2035 General Plan, as well as development proposed under the Downtown Transit-Oriented Development Specific Plan (a consolidation and update of the North San Fernando Boulevard Master Plan and the Burbank Center Plan) and Golden State Specific Plan (GSSP). As described in Section 3, *Environmental Setting,* the Downtown TOD Specific Plan would facilitate development of up to 9,944 residential units and 6,083,657 square feet of commercial and business development land uses; and the GSSP would facilitate development of up to 7,205 residential units and 3,149,623 square feet of commercial and business development land uses. Cumulative impacts may occur if impacts of the proposed Project combine with similar impacts of other projects in the cumulative scenario.

Conflict with Applicable Air Quality Plan

While the four sample construction scenarios would not result in emissions that exceed the SCAQMD regional thresholds, construction of individual projects under the Proposed Project would have the potential to exceed SCAQMD regional thresholds if they involve other factors outside the scope of the modeled scenarios. Future development under the proposed Project would not result in unplanned population and housing growth and the proposed Project would include strategies that help reduce air pollutant emissions through promoting transportation and land use design factors, such as intensification and reuse of already developed lands in proximity to transit and commercial areas, that would result in VMT reductions. However, under the cumulative scenario, housing growth under the Downtown TOD Specific Plan, the GSSP, and the proposed Project would increase the City's total housing units by 26,851 housing units from 46,457 units in 2024 to 73,308 units in 2035. As discussed further discussed in Section 4.12, *Population and Housing*, SCAG forecasted 48,600 units in 2035 and under the Burbank2035 Land Use Element, the established Citywide cap on the number of housing units is 61,647 units. Therefore, cumulative housing growth under the Downtown TOD Specific Plan, the GSSP, and the proposed Project would exceed the SCAG and City forecasts and caps for population and housing growth. There are no mitigation measures available to reduce impacts to housing and population that are anticipating growth beyond the SCAG regional forecasts. Therefore, as with direct air quality impacts, cumulative air quality impacts would be significant and unavoidable.

National and State Air Quality Standards

In order to assess cumulative impacts of emissions, SCAQMD recommends that projects be evaluated to determine whether they would be consistent with project-specific emissions thresholds. In the case of proposed Project, air pollutant emissions would be considered to be cumulatively considerable if the new sources of emissions exceed SCAQMD project-specific emissions thresholds. The cumulative context for consideration of most air quality impacts is the SCAB. The context for localized significance thresholds is within 1,500 feet of the project site per SCAQMD LST guidance, as health risks generally decrease by about 90 percent at 1,500 feet from the emission source (SCAQMD 2017).

As discussed under Impact AQ-3, construction activities and operation of future development projects accommodated under the proposed Project would result in significant impacts related to criteria emissions as the individual projects may exceed the SCAQMD maximum daily thresholds for project-specific impacts. In addition, as discussed under Impact AQ-3, without a specific construction schedule, timing and emission levels cannot be accurately estimated; it is possible that multiple

construction projects would occur concurrently and immediately adjacent to one another to combine localized emissions and result in the exposure of sensitive receptors to concentrations exceeding the LSTs. Similarly, without specific land use details, it is possible that the proposed Project may accommodate operation of large projects within proximity of sensitive receptors (e.g., residential or mixed-use high-rises) and, thereby, result in cumulative operations emissions that exceed SCAQMD thresholds. Therefore, reasonably expected construction and operation of future development projects under the proposed Project have the potential to result in a considerable contribution to a cumulative air quality impact, consistent with the anticipated impacts under development of the Downtown TOD Specific Plan and GSSP. Implementation of Mitigation Measures AQ-1 and AQ-2 would reduce emissions generated by various construction activities, including equipment operation, truck trips, and painting and operational sources including vehicle use, natural gas use, and other area sources. Furthermore, development accommodated under the proposed Project would be substantially similar to existing projects within the Specific Plan Area, and continued enforcement of existing regulations would reduce potential for multiple adjacent development projects to contribute to deterioration of air quality. However, it is possible that construction and operational activities associated with individual development projects citywide could generate emissions that would exceed the SCAQMD maximum daily significance thresholds as well as LSTs despite incorporation of Mitigation Measure AQ-1 and AQ-2. Thus, the incremental effect of the proposed Project related to construction and operation would be cumulatively considerable and cumulative impacts would be significant and unavoidable.

Toxic Air Contaminants

Individual future development project would be responsible for demonstrating compliance that TACs would not exceed the SCAQMD threshold of 10 in one million for carcinogenic risks and a hazard index of 1.0 for non-carcinogenic chronic and acute health risks. These thresholds are designed to protect public health and prevent exposures to substantial pollutant concentrations. The proposed Project would not directly exacerbate existing conditions related to TAC concentrations as operation of development under the proposed Project is not associated with substantial TAC emissions. However, construction of individual projects developed under the proposed Project may generate TAC emissions that exceed the SCAQMD thresholds. For these reasons, cumulative impacts related to construction emissions of TACs would be cumulatively considerable and cumulative impacts would be significant and unavoidable.

4.3 Biological Resources

This section evaluates the potential environmental impacts related to biological resources associated with implementation of the proposed Project. Specifically, this section reviews the proposed Project's impact related to special status species and local biological resources policies or ordinances. Other thresholds of significance associated with riparian habitats, protected wetlands, wildlife movement, and habitat conservation plans are discussed in Section 4.19, *Effects Found Not to be Significant*; therefore, these issues are not studied further herein.

4.3.1 Environmental Setting

a. Regional Setting

The City of Burbank (hereafter referred to as "City" or "Burbank") encompasses approximately 17.1 square miles in the eastern San Fernando Valley in Los Angeles County (hereafter referred to as "County"), 12 miles north of downtown Los Angeles. The County encompasses approximately 4,084 square miles and borders 70 miles of coast on the Pacific Ocean and extends west to the Mojave Desert. The County is divided west-to-east by the San Gabriel Mountains, which are part of the Transverse Ranges of Southern California. The region's climate is characteristic of a Mediterranean climate system with hot, dry summers and cool, wet winters.

Burbank generally has low habitat quality for wildlife in its urban areas; however, more than 2,700 acres of open space are located within the City limits. Most of the open space in the general vicinity of the City is in the Santa Monica Mountains to the south-southeast, as well as the Verdugo Mountains located approximately 3.6 miles to the northeast of the Burbank Media District Specific Plan Area (hereafter referred to as "Specific Plan Area"). Both the Santa Monica Mountains and Verdugo Mountains are characterized by moderate to steep terrain that supports native species characteristic of shrub/chaparral communities and native woodlands consisting of native oak trees.

b. Project Setting

The Specific Plan Area encompasses approximately 544 acres located in the southwestern portion of Burbank. As shown on Figure 2-2, *Project Site Location*, the Specific Plan Area is generally bounded by the Magnolia Park neighborhood to the north, South Keystone Street and residences to the east, the Los Angeles River to the south, and the Toluca Lake and Toluca Woods residential neighborhoods in the City of Los Angeles to the west. The Specific Plan Area is bisected by State Route 134 and West Olive Avenue and is comprised of a mix of land uses, including residential, commercial, industrial, community services, and open space. Approximately 212 acres within the Specific Plan Area are under private development agreements with several multi-media studios.

Open space within the Specific Plan Area is scarce due to its urban setting. Open space areas in the vicinity of the Specific Plan Area that provide habitat for nesting birds and common terrestrial wildlife include Buena Vista Park, Johnny Carson Park, Lakeside Country Club, and Forest Lawn Memorial Park. The Santa Monica Mountains, which provide habitat to native flora and fauna, are located immediately to the south and southeast of Forest Lawn Drive. Furthermore, landscaped areas within the Specific Plan Area, such as street medians, parkways, and other green areas, provide habitat for nesting birds and potentially other common wildlife species.

Special-Status Species

Special-status species discussed herein include:

- Species listed as threatened or endangered under the Federal Endangered Species Act (FESA), including proposed and candidate species
- Species listed as candidate, threatened, or endangered under the California Endangered Species Act (CESA)
- Species designated as Fully Protected by the California Fish and Game Code (CFGC) or identified as Species of Special Concern or Watch List by the California Department of Fish and Wildlife (CDFW)
- Plant species protected under the Native Plant Protection Act (NPPA) as State Rare (SR)
- Plant species ranked by California Native Plant Society (CNPS) under California Rare Plant Ranks (CRPR) 1A, 1B, 2A, and 2B

Information regarding the occurrences of special-status species in the vicinity of the Specific Plan Area was obtained from regional queries from the CDFW California Natural Diversity Database (CNDDB) (CDFW 2023a) and CNPS Electronic Inventory (CNPS 2023) within a nine-quadrangle regional search area, including the *Burbank, Hollywood, Van Nuys, San Fernando, Condor Peak, Pasadena, Beverly Hills, Sunland,* and *Los Angeles* United States Geological Survey (USGS) 7.5-minute quadrangles. The results of these scientific database queries were compiled into a table that is presented in Appendix E. Additionally, the United States Fish and Wildlife Service (USFWS) Critical Habitat Portal (USFWS 2023a) was reviewed.

A total of 72 special-status plant species have been documented as occurring within the nine-quadrangle region. Appendix E includes a list of these special-status plant species with habitat requirements. None of the 72 special-status plant species documented in the region have potential to occur in the Specific Plan Area because the area is largely developed.

A total of 49 special-status invertebrate, fish, amphibian, reptile, bird, and mammal species have been documented as occurring within the nine-quadrangle region. No special-status species were found to have moderate or high potential to occur due to the lack of suitable habitat and documented observations within nine quadrangles of the Specific Plan Area. Of the 49 special-status wildlife species documented in the region, eight non-listed species have a low potential to occur in the Specific Plan Area, primarily due to potential habitat occurring in nearby parks and open areas. These non-listed species include: coast range newt (*taricha torosa torosa*, CDFW Species of Special Concern [SSC]), California legless lizard (*Anniella* spp., SSC), western pond turtle (*Actinemys marmorata*, SSC), southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*, SSC), pallid bat (*Antrozous pallidus*, SSC), Townsend's big-eared bat (*Corynorhinus townsendii*, SSC), western mastiff bat (*Eumops perotis californicus*, SSC), and western yellow bat (*Lasiurus xanthinus*¸ SSC). The remaining 41 special status wildlife species have no potential to occur within the Specific Plan Area and are not discussed further. A list of all species with their habitat requirements are provided in Appendix E of this EIR.

Coast range newt and western pond turtle may utilize the Los Angeles River for breeding and/or foraging behavior; however, the quality of the river habitat is low due to channelization, and, as a result, these species have not been observed in the Specific Plan Area in recent years and have low potential to occur in the Specific Plan Area. Although potential roosting habitat for bats (i.e., buildings or highway overpasses) is present in the Specific Plan Area, foraging habitat along the Los Angeles

River is limited due to channelization. As such, various bat species also have not been observed in the Specific Plan Area in recent years and have low potential to occur in the Specific Plan Area.

Wetlands, Streams, and Riparian Habitats

The Specific Plan Area is located within the Los Angeles River watershed. However, the City is not subject to the jurisdiction of the Los Angeles River Master Plan, as the plan applies only to specific reaches and project areas within the designated Los Angeles River corridor, and Burbank is not included among the jurisdictions with active implementation responsibilities (Los Angeles County 2022). The Los Angeles River runs along the southern border of the Specific Plan Area for approximately 0.48 mile with a small portion located within the boundary of the Specific Plan Area for approximately 0.11 mile. The segment of the Los Angeles River within and adjacent to the Specific Plan Area is channelized, lacks riparian vegetation, and is bordered by development, including Warner Bros. Discovery to the north and Forest Lawn Drive to the south. The USFWS National Wetlands Inventory (NWI) does not indicate any additional aquatic resources (i.e., wetlands, streams or riparian habitat) within the Specific Plan Area (USFWS 2026b).

Nesting Birds

Suitable nesting sites, such as shrubs, trees, grasslands, and man-made structures, for avian species protected by the federal Migratory Bird Treaty Act (MBTA) and CFGC occur throughout the Specific Plan Area. Some species of birds prefer vegetation for nesting, including native and ornamental vegetation, and some species can be found nesting in man-made structures, such as power poles or the eaves of buildings. Birds generally nest in the region between February 1 through September 15, but may begin nesting January 1 for some raptor species.

Bats

While there are no specific laws in California protecting bats as a specific type of wildlife, 10 species of bats are currently considered Species of Special Concern by the CDFW. Additionally, the Western Bat Working Group lists some species of bats as High Priority (for consideration of conservation measures). Both special-status and common species of bats may roost in a variety of habitats and structures, such as trees with exfoliating bark, tree hollows, broad-leafed trees, palm fronds, bridges, hollow beams, mines, caves, rocky crevices, attics, and eaves of buildings. Bats typically have a maternity season (generally from April 1 through August 31), and maternity roosts will be situated in areas to raise young. Depending on the species, some bats may not migrate and will use the same roost year-round. Additionally, bats may go into torpor (a temporary hibernation) during colder months (generally November-February) when bats may not be detectable while they are in deep sleep, making any potential relocations or eviction more challenging during this time frame. Because bat species identification is typically gathered through acoustic detectors that record the inaudible ultrasonic calls of bats, not all special-status bat species have been documented in scientific databases, such as the CDFW's CNDDB, and may occur in areas where suitable habitat may be present.

Critical Habitat

Critical habitat is a term used by the FESA to identify specific geographic areas that contain features essential for the conservation of a threatened or endangered species that may require special management or protection. These habitats provide suitable conditions that may provide nesting/denning sites, foraging areas, cover, and other resources that are essential to the species' survival, reproduction, and genetic diversity. Critical habitat areas have been developed because the

species face various threats to its habitat, including urban development, agriculture, invasive species, and habitat fragmentation. The habitat areas were defined based on scientific studies and analysis of the species' habitat requirements. The designation of critical habitat does not necessarily restrict all human activities within the designated areas; however, it requires federal agencies to consult with the USFWS to ensure that all proposed actions or projects do not adversely modify or destroy the critical habitat. It is also important to note that the species may also occur outside these designated areas within similar habitats occurring throughout the City, and consultation with the USFWS is still required in the event suitable habitat for the species may be impacted.

The USFWS Critical Habitat Portal (USFWS 2026a) was reviewed to obtain information on limits of federally defined critical habitat. Based on this review, no critical habitat occurs within the Specific Plan Area. The nearest critical habitat to the Specific Plan Area is 7.5 miles to the north at Hansen Dam Park for southwestern willow flycatcher (*Empidonax traillii extimus*), and critical habitat for the Santa Ana sucker (*Catostomus santaanae*) is roughly the same distance away within the San Gabriel Mountains via Big Tujunga Creek.

Wildlife Corridors

Wildlife corridors usually connect one large habitat area with another, and while there is no pre-defined size limit for such areas, they most often are on the scale of mountain ranges, valleys, or clearly defined ecological settings (e.g., vernal pools). Habitat linkages differ somewhat from wildlife corridors in that they may be identified by the presence of certain resources rather than by areas of linear movement. They may serve as corridors for species, which move from site to site as individuals, but for low-mobility organisms (such as plants, flightless arthropods, amphibians, reptiles, and chaparral birds), they may maintain genetic diversity between larger habitat areas by permitting long-term genetic exchange over a broad area.

The Specific Plan Area's urban setting limits opportunities for wildlife movement. Urban wildlife, such as coyotes (*Canis latrans*), skunks (*Mephitis mephitis*), and raccoons (*Procyon lotor*) can move freely through the urban and suburban areas of the Specific Plan Area, and the Los Angeles River channel could theoretically be used for wildlife to move within the urban environment. However, due to the existing development, the Specific Plan Area does not serve as a wildlife corridor between large open space habitats, such as the Verdugo Mountains to the north and the Santa Monica Mountains to the south.

4.3.2 Regulatory Setting

Federal, State, and local authorities under a variety of statutes and guidelines share regulatory authority over biological resources. The primary authority for general biological resources lies within the land use control and planning authority of local jurisdictions, which, in this instance, include the City of Burbank and the County of Los Angeles for areas outside City limits. The CDFW is a trustee agency for biological resources throughout the State as defined in the *CEQA Guidelines* and has direct jurisdiction under the CFGC, which includes, but is not limited to, resources protected by the State of California under the CESA. In addition, Los Angeles Regional Water Quality Control Board (LARWQCB) is a responsible agency for jurisdictional waters of the State. Below are summaries of the federal, State, and local regulations or guiding documents.

a. Federal Regulations

Federal Endangered Species Act (FESA)

Under the FESA, authorization is required to "take" a listed species. Take is defined under Section 3 of the FESA as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct." Under federal regulation (50 Code of Federal Regulations [CFR] Sections 17.3, 222.102), "harm" is further defined to include habitat modification or degradation where it would be expected to result in death or injury to listed wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering. Section 7 of the FESA outlines procedures for federal interagency cooperation to conserve federally listed species and designated critical habitat, as defined previously in the Section 4.3.1.

Section 7(a)(2) of the FESA and its implementing regulations require federal agencies to consult with the USFWS or National Marine Fisheries Service (NMFS) to ensure that these agencies are not undertaking, funding, permitting, or authorizing actions likely to jeopardize the continued existence of listed species or result in the destruction or adverse modification of critical habitat. For projects where federal action is not involved and take of a listed species may occur, the project proponent may seek to obtain an incidental take permit under Section 10(a) of the FESA. Section 10(a) allows USFWS to permit the incidental take of listed species if such take is accompanied by a habitat conservation plan that includes components to minimize and mitigate impacts associated with the take.

The USFWS and NMFS share responsibility and regulatory authority for implementing the FESA (16 United States Code [USC] Section 1536, 16 USC Section 1531 et seq.).

Migratory Bird Treaty Act

As amended in 1972, the MBTA is administered by the USFWS and protects nesting migratory birds by making it unlawful to take any migratory bird listed in 50 CFR 10, including their nests, eggs, or products. Migratory birds include geese, ducks, shorebirds, raptors, songbirds, and many other species.

United States Army Corps of Engineers (USACE) Jurisdiction

The USACE, under provisions of Section 404 of the Clean Water Act (CWA) and USACE implementing regulations, has jurisdiction over the placement of dredged or fill material into "waters of the United States." Congress enacted the CWA "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters."

USACE jurisdictional limits are typically identified by the Ordinary High-Water Mark (OHWM) or the landward edge of adjacent wetlands (where present). The OHWM is the "line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding area" (33 CFR 328.3).

The USACE defines wetlands as "those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions" (33 CFR 328.3). The USACE's delineation procedures identify wetlands in the field based on indicators of three wetland parameters: hydrophytic vegetation, hydric soils, and wetland hydrology. Wetlands must

possess a continuous surface connection to navigable waters or their relatively permanent tributaries to be subject to CWA jurisdiction.

Under Section 404 of the CWA, the USACE has authority to regulate activities that discharge dredge or fill material into wetlands or other "waters of the United States" through issuance of a Section 404 Permit.

b. State Regulations

California Endangered Species Act

The CDFW is responsible for administration of the CESA, which prohibits the unauthorized take of State-listed threatened and endangered plants and animals. Take is defined in the CFGC Section 86 as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." The CESA allows CDFW to authorize take incidental to otherwise lawful activities under the CFGC Section 2081. Project proponents wishing to obtain incidental take permits can do so through a permitting process outlined in Title 14 of the California Code of Regulations (CCR) Section 783 et seq.

Native Plant Protection Act

The NPPA was enacted in 1977 and allows the California Fish and Game Commission to designate plants as rare or endangered. Currently, 64 species, subspecies, and varieties of plants are protected as rare under the NPPA. The NPPA prohibits take of endangered or rare native plants but includes some exceptions for agricultural and nursery operations; emergencies; and after properly notifying CDFW for vegetation removal from canals, roads, and other sites, changes in land use, and in certain other situations. Effective in 2015, the CDFW promulgated regulations (14 CCR 786.9) under the authority of the NPPA, establishing that the CESA permitting procedures (CFGC Section 2081) would be applied to plants listed under the NPPA as "Rare."

Nesting Bird Protection – California Fish and Game Code

According to the CFGC Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird [except English sparrows (*Passer domesticus*) and European starlings (*Sturnus vulgaris*)]. CFGC Sections 3503 and 3513 prohibit the taking of specific birds, their nests, eggs, or any portion thereof during the nesting season. CFGC Section 3503.5 specifically protects birds in the orders Falconiformes and Strigiformes (birds-of-prey). CFGC Section 3513 essentially overlaps with the federal MBTA, prohibiting the take or possession of any migratory nongame bird. CFGC Section 3800 states that all birds occurring naturally in California that are not resident game birds, migratory game birds, or fully protected birds are nongame birds.

Section 1600 et seq. of the California Fish and Game Code

CFGC Section 1600 et seq. prohibits, without prior notification to CDFW, the substantial diversion or obstruction of the natural flow of, or substantial change or use any material from the bed, channel, or bank of any river, stream, or lake, or deposit or dispose of debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake. In order for these activities to occur, the CDFW must receive written notification regarding the activity in the manner prescribed by the CDFW and may require a lake or streambed alteration agreement. Lakes, ponds, perennial and intermittent streams, and associated riparian vegetation, when present, are subject to this regulation.

In accordance with CFGC Section 1602, the CDFW has jurisdiction over lakes and streambeds (including adjacent riparian resources). The CDFW regulates wetland areas when they are part of a river, stream, or lake.

Porter-Cologne Water Quality Control Act

The State Water Resources Control Board (SWRCB) and each of nine local RWQCBs have jurisdiction over "waters of the State" pursuant to the Porter-Cologne Water Quality Control Act, which are defined as any surface water or groundwater, including saline waters, within the boundaries of the State. The SWRCB has issued general Waste Discharge Requirements (WDRs) regarding discharges to "isolated" waters of the State (Water Quality Order No. 2004-0004-DWQ, Statewide General Waste Discharge Requirements for Dredged or Fill Discharges to Waters Deemed by the USACE to be Outside of Federal Jurisdiction). The local RWQCB, LARWQCB, implements this general order for isolated waters not subject to federal jurisdiction.

Clean Water Act Section 401 - Water Quality Certification

Pursuant to Section 401 of the CWA, projects that apply for a USACE permit for discharge of dredge or fill material must also obtain water quality certification under Section 401 from the RWQCB.

Clean Water Act Section 402 - National Pollutant Discharge Elimination System Permitting

The CWA and associated federal regulations (Title 40 of the CFR 123.25(a)(9), 122.26(a), 122.26(b)(14)(x) and 122.26(b)(15)) require nearly all construction site operators engaged in clearing, grading, and excavating activities that disturb one acre or more, including smaller sites in a larger common plan of development or sale, to obtain coverage under a National Pollutant Discharge Elimination System (NPDES) permit for their stormwater discharges, and develop a Storm Water Pollution Prevention Plan (SWPPP). The NPDES Program is a federal program which has been delegated to the State of California for implementation through the SWRCB or RWQCBs.

c. Local Regulations

Burbank Municipal Code (BMC)

Title 9 (Building Regulations), Chapter 3 (Environmental Protection) of the BMC outlines provisions pertaining to storm water and runoff control for all projects requiring City-issued permits or other development approvals. The provisions are consistent with Section 401 of the CWA and associated federal regulations requiring a project to obtain an NPDES permit and develop a SWPPP when applicable. The BMC also requires implementation of best management practices (BMPs) for all construction projects.

The BMC outlines regulations regarding construction development and tree preservation that are relevant to the proposed Project. Title 7 (Public Ways and Property), Chapter 4 (Trees and Vegetation) of the BMC requires a project to obtain a tree removal permit prior to the removal of any public tree for construction-related purposes. Any public tree requested by any person or property owner to be removed for the purpose of any type of construction shall be replaced by the permittee with a tree of a size and species in a location to be determined by the Parks, Recreation and Community Services Director, consistent with the City's Master Street Tree Plan. Notwithstanding this process for construction-related tree removal, BMC Section 7-4-108 also requires the Parks, Recreation and

Community Services Director to develop and maintain a list of restricted public trees that will be given special treatment to retain and protect them.

Burbank2035 General Plan Open Space and Conservation Element

The proposed Project will be consistent with the Burbank2035 General Plan. The following goals, objectives, and policies from the General Plan Open Space and Conservation Element are relevant to the proposed Project (City of Burbank 2013):

Goal 6: Open Space Resources

Burbank's open space areas and mountain ranges are protected spaces supporting important habitat, recreation, and resource conservation.

Policy 6.2. Protect the ecological integrity of open spaces and maintain and restore natural habitats and native plant communities.

Goal 8: Biological Resources

Burbank's high-quality biological communities are sustained.

Policy 8.1. Prohibit development that jeopardizes or diminishes the integrity of sensitive or protected plant and animal communities.

Policy 8.2. Improve ecological and biological conditions in urban and natural environments when reviewing proposals for site development, as well as when making public improvements.

Policy 8.3. Support public acquisition of parcels key to the integrity of ecosystems.

Policy 8.4. Naturalize disturbed areas and prevent the invasion of exotic plants.

Policy 8.5. Encourage landscaping that incorporates native plant species.

4.3.3 Impact Analysis

a. Significance Thresholds

According to Appendix G of the *CEQA Guidelines,* impacts related to biological resources would be potentially significant if implementation of the proposed Project would do any of the following:

1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
3. Have a substantial adverse effect on state or federally protected wetlands (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;

5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Thresholds 1 and 5 are analyzed below.

b. Effects Found Not to be Significant

Thresholds 2, 3, 4, and 6 were determined to have a less-than-significant impact and, therefore, are discussed under Section 4.19, *Effects Found Not to be Significant* and summarized below.

The Specific Plan Area does not include any documented sensitive natural communities, including wetlands or riparian habitats. The 0.11-mile-long portion of the Los Angeles River that occurs along the southern boundary of the Specific Plan Area is channelized and not conducive to supporting riparian or wetland habitat. Any future development project under the proposed Project would occur in urbanized areas and, therefore, would not directly or indirectly impact sensitive natural communities or riparian habitat.

The Specific Plan Area lies within an existing potential habitat patch; however, the USFWS NWI does not indicate any additional aquatic resources within the Specific Plan Area. Any future development project in the Specific Plan Area with potential to impact the Los Angeles River would be required to comply with Section 1602 of the CFGC and Sections 401 and 404 of the CWA. Adherence to these regulations would mitigate substantial adverse impacts to the Los Angeles River by requiring projects to obtain proper permitting and implement regulatory procedures. Therefore, impacts related to protected wetlands would be less than significant.

The Specific Plan Area is urbanized, and as such, there are no known regional wildlife habitat linkages or described wildlife movement within the Specific Plan Area. The Specific Plan Area's urban environment generally does not facilitate the movement of wildlife species that are not adapted to urban and suburban areas. The Los Angeles River channel may act as an urban corridor for local wildlife movement, and migratory birds could utilize water within the concrete-lined channels during migration. The utilization of the Los Angeles River as an urban corridor or water source would not be affected by any future development project under the proposed Project because any development near the already-disturbed Los Angeles River channel would adhere to CFGC and CWA requirements and would not encroach into the Los Angeles River more than current conditions. Therefore, impacts related to wildlife movement would be less than significant.

The Specific Plan Area is not within an area subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved conservation plans. Therefore, no impacts would occur.

c. Methodology

The following analysis is based on a review of the Burbank2035 General Plan (City of Burbank 2013), BMC, CDFW CNDDB (CDFW 2023), CNPS Electronic Inventory (CNPS 2023), USFWS Critical Habitat Portal (USFWS 2026a), and the USFWS NWI (USFWS 2026b). The scope of this analysis is at a programmatic level rather than a project-specific level; thus, this analysis of impacts to biological resources is discussed qualitatively. The adoption of the proposed Project does not include physical development that could directly impact biological resources. However, implementation of the proposed Project would allow development at greater densities and intensities than currently allowed

within the Specific Plan Area. Future development projects under the proposed Project would require subsequent analysis to evaluate impacts to biological resources, significance of impacts, need for project-specific mitigation, and any subsequent discretionary permits or coordination with resource agencies (e.g., USFWS, USACE, CDFW, RWQCB) that may be required.

Threshold 1:	Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Impact BIO-1 THE SPECIFIC PLAN AREA IS LARGELY URBANIZED, AND THE PROPOSED PROJECT WOULD PRIORITIZE THE DEVELOPMENT OF OPPORTUNITY SITES THAT HAVE BEEN PREVIOUSLY DEVELOPED AND/OR DISTURBED. NONETHELESS, FUTURE DEVELOPMENT PROJECTS CARRIED OUT UNDER THE PROPOSED PROJECT COULD POTENTIALLY ADVERSELY IMPACT SPECIAL-STATUS SPECIES, NESTING BIRDS, AND THEIR HABITAT. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH ADHERENCE TO MITIGATION MEASURE BIO-1, WHICH REQUIRES BIOLOGICAL SURVEYS PRIOR TO CONSTRUCTION.

As discussed in Section 4.3.1, *Setting*, no special-status plant species are expected to occur in the Specific Plan Area, and eight wildlife species have a low potential to occur in the Specific Plan Area in areas where suitable habitat may occur. Although the Specific Plan Area is urbanized and would prioritize development on previously developed and/or disturbed infill sites that do not support a wide array of biological resources, suitable habitat for special-status species and nesting birds may be present on existing buildings and in surrounding ornamental vegetation, such as trees, shrubs, herbaceous plants, and vegetation within parkways. Although the amount of natural habitat in the Specific Plan Area is limited and the proposed Project would not include urban expansion into natural areas, future development projects carried out under the proposed Project could reduce the availability of habitat for wildlife and migratory birds, including special-status species. Construction activities with potential to disturb special-status species and nesting birds directly (i.e., injury, mortality, or disruption of normal nesting behaviors) or indirectly (i.e., construction noise, dust, or vibration from equipment) include, but are not limited to, building demolition, grading, laydown of materials, access and infrastructure improvements, building construction, and vegetation removal.

A segment of the Los Angeles River is adjacent to and partially within the Specific Plan Area. Although the portion of the Los Angeles River within the Plan Area is channelized, lacks riparian vegetation, and may impede wildlife from migrating into the Plan Area from the Santa Monica Mountains, the river may serve as a water source or breeding grounds for resident and migratory birds and previously mentioned special-status species with low potential to occur. Future development projects facilitated by the proposed Project would be subject to the provisions of federal and State regulations, including the Endangered Species Act, protecting biological resources. These regulations include requirements for biological studies for development sites where potential habitat exists, and consultation with applicable regulatory agencies for development sites where special-status resources are found.

In addition, a project cannot be approved by the City if it is inconsistent with the goals, policies, and requirements of the Burbank2035 General Plan. The proposed Project is consistent with the Burbank2035 General Plan goals and policies outlined in the Open Space and Conservation Element. Implementation of the proposed Project would not conflict with or impede the attainment of these goals and policies and therefore would support the City's long-term objectives for resource conservation and habitat protection.

Nonetheless, construction of future development under the proposed Project could potentially occur during the bird nesting season, which is generally from March 1 through August 31 and begins as early as February 1 for raptors. Therefore, construction activities have the potential to disturb nesting birds, which would be a potentially significant impact.

Mitigation Measure

BIO-1 Pre-Construction Nesting Bird Surveys and Nest Avoidance

For construction activities initiated during the bird nesting season (February 1 through August 31) that involve the removal of trees, vegetation, or other nesting bird habitat, including abandoned structures and other man-made features, a pre-construction nesting bird survey shall be conducted no more than seven days prior to the initiation of ground disturbance and vegetation removal activities. The survey, whose cost shall be the sole responsibility of the development/project applicant, shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in and around the Specific Plan Area. The pre-construction nesting bird survey shall be conducted on foot and shall encompass the construction site and a 300--foot buffer around the construction site. Inaccessible areas (i.e., private property) within the survey boundaries shall be surveyed from afar using binoculars.

If nests are found, an avoidance buffer shall be determined by the biologist dependent upon the species, the location of the nest, the proposed work activity, and existing disturbances associated with land uses within and outside of the construction site. The avoidance buffer shall be demarcated by the biologist with brightly colored construction fencing, flagging, construction lathe, or other means to demarcate the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone. No ground disturbing activities shall occur within the buffer zone until the biologist has confirmed that breeding/nesting is completed, and the young have fledged the nest. Encroachment into the buffer zone shall occur only at the discretion of the biologist on the basis that the encroachment will not be detrimental to an active nest. A report summarizing the pre-construction survey(s) shall be prepared by the biologist documenting and verifying compliance with the above requirements and applicable State and federal regulations protecting nesting birds that shall be submitted to the City.

Site plans shall include a statement acknowledging compliance with the California Fish and Game Code and the Migratory Bird Treaty Act that includes avoidance of active bird nests and identification of protocols to avoid potential impacts to active nests, such as checking for nests prior to construction activities and implementing proper mitigation procedures if an active nest is discovered. Should construction activities be required to occur near an active nest, the biologist shall serve as a construction monitor to ensure that no inadvertent impacts on the nest would occur.

Significance After Mitigation

Future development projects under the proposed Project would be subject to further environmental review, including site-specific surveys, and, as appropriate, project-specific mitigation. Since special-status species are not likely to occur within the Specific Plan Area, future development projects are not anticipated to impact special-status species and no species-specific mitigation is required. Impacts to nesting birds would be less than significant with the incorporation of Mitigation Measure BIO-1, which requires a project-specific pre-construction nesting bird survey prior to site development for construction activities initiated during the bird nesting season. Because the survey would be site-specific, it is not anticipated that any secondary impacts associated with the survey would occur. .

Determination

Less than significant with mitigation incorporated

Threshold 5:	Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

IMPACT BIO-2 THE PROPOSED PROJECT WOULD NOT CONFLICT WITH ANY LOCAL POLICIES OR ORDINANCES. WITH ADHERENCE TO TITLE 7, CHAPTER 4 OF THE BURBANK MUNICIPAL CODE NO IMPACT WOULD OCCUR.

Implementation of the proposed Project would require compliance with the BMC. Title 7 (Public Ways and Property), Chapter 4 (Trees and Vegetation) of the BMC requires projects to obtain a tree removal permit prior to the removal of any public tree for construction-related purposes and outlines related tree replacement requirements. In addition, BMC Section 7-4-108 requires the City to develop and maintain a restricted list of trees, including landmark trees, trees of outstanding size and beauty, and dedicated trees, which will be given special treatment to retain and protect them. In the event that future development projects under the proposed Project would include removal of public trees, the project applicant would be required to either obtain tree removal permits or take special measures to protect the trees under these BMC requirements. No additional local policies or ordinances regarding biological resources apply to future development within the Specific Plan Area. The proposed Project will comply with the BMC; therefore, no impact would occur.

Determination

No impact

4.3.4 Cumulative Impacts

The geographic extent of cumulative analysis for biological resources is the City of Burbank and immediately adjacent areas that could be directly or indirectly affected, including the Downtown Burbank Transit Oriented Development (TOD) Specific Plan (a consolidation and update to the North San Fernando Boulevard Master Plan and the Burbank Center Plan) and the Golden State Specific Plan (GSSP) that are currently being prepared by the City, as described in Section 3, *Environmental Setting*. As described in Section 3, *Environmental Setting,* the Downtown TOD Specific Plan would facilitate development of up to 9,944 residential units and 6,083,657 square feet of commercial and business development land uses; and the GSSP would facilitate development of up to 7,205 residential units and 3,149,623 square feet of commercial and business development land uses. Cumulative impacts may occur if impacts of the proposed Project combine with similar impacts of other projects in the cumulative scenario.

Special Status Species

Based on the impact analysis provided in Impact BIO-1, the contribution of the proposed Project's impacts on special-status species, migratory birds, and habitat areas would be cumulatively considerable without mitigation. Although the amount of natural habitat in the Specific Plan Area is limited and the proposed Project would not include urban expansion into natural areas, future development projects carried out under the proposed Project could reduce the availability of habitat for wildlife and migratory birds, including special-status species. As development occurs in the lesser or undeveloped portions of the City, habitat for biological resources will continue to be converted to urban development. It is understood that mobile species (e.g., most reptiles, mammals, and birds)

may survive this development by moving to other areas, but less mobile species (i.e., species reliant on a certain type of habitat) would not. Conversion of natural habitat will reduce the availability of habitat for special-status species and the natural areas remaining will likely be isolated and not support biological resources beyond their carrying capacity. Direct impacts to State or federally listed (or candidate) species would be minimized through compliance with the Endangered Species Act, which requires authorization for the take of a species in accordance with applicable regulations concerning the protection of such a species. Adherence to Mitigation Measures BIO-1 would reduce the potential for direct and indirect impacts to nesting birds. Buildout of the proposed Project in conjunction with the two aforementioned Specific Plans would result in the increase of urban buildout and contribute to the loss of habitat for special-status species, as well as common species. Impacts to special-status species and nesting birds would be reduced to a less-than-significant level with adherence to regulations requiring biological studies for development sites where potential habitat exists, consultation with applicable regulatory agencies for development sites where special-status species are found, and implementation of Mitigation Measure BIO-1. With adherence to permitting requirements and implementation of the mitigation measure in this EIR, the incremental effect of the proposed Project related to special status species would not be cumulatively considerable and cumulative impacts would be less than significant with mitigation incorporated.

Riparian Habitat, Sensitive Natural Communities, and Wetlands

If development associated with the two aforementioned Specific Plans were to occur near areas identified as jurisdictional waters, including the Los Angeles River, it would be subject to the permit requirements of the USACE, LARWQCB, and CDFW, pursuant to Sections 404 and 401 of CWA, the Porter-Cologne Water Quality Control Act, and Section 1600 of the CFGC. Under these provisions, the alteration or obstruction of the flow of the river and the deposit or disposal of debris, waste, or other materials into the river would be regulated. Thus, with adherence to existing federal and State regulations, the incremental effect of the proposed Project related to riparian habitats, sensitive natural communities, and wetlands would not be cumulatively considerable and cumulative impacts would be less than significant.

Wildlife Movement

Future development projects under the two aforementioned Specific Plans are not expected to affect wildlife movement since most of the City is already developed and does not facilitate the movement of wildlife species. The Los Angeles River channel may act as an urban corridor for local wildlife movement, and migratory birds could utilize water within the concrete-lined channels during migration. The utilization of the Los Angeles River as an urban corridor or water source would not be affected by any future development project under the cumulative scenario because any development near the already-disturbed Los Angeles River channel would adhere to CFGC and CWA requirements and would not encroach into the Los Angeles River more than current conditions. Thus, the incremental effect of the proposed Project related to wildlife movement would not be cumulatively considerable and cumulative impacts would be less than significant.

Regulatory Compliance

To ensure preservation of the potential habitat patch, future development projects under the proposed Project would be required to comply with relevant regulatory requirements, including Section 1602 of the CFGC and Sections 401 and 404 of the CWA. Therefore, the incremental effect of

the proposed Project related to compliance with regulatory requirement would not be cumulatively considerable and cumulative impacts would be less than significant.

4.4 Cultural Resources

This section evaluates the potential environmental impacts related to cultural resources associated with implementation of the proposed Project. Specifically, this section reviews the proposed Project's impacts related to prehistoric and historic-period archaeological resources, and built environment resources.

4.4.1 Environmental Setting

The cultural setting for the Burbank Media District Specific Plan Area (hereafter referred to as "Specific Plan Area") is presented broadly in what follows under three overviews: Prehistoric, Ethnographic, and Historic. The Prehistoric and Historic overviews describe human occupation before and after European contact; the Ethnographic Overview provides a synchronic "snapshot" of traditional Native American lifeways as described by European observers prior to assimilative actions.

a. Local History

The City of Burbank was developed on land that had once been part of the holdings of Dr. David Burbank, a dentist who arrived in Southern California in 1866. Burbank acquired 9,200 acres of land, including Rancho La Providencia and a portion of Rancho San Rafael, in 1866. He later sold a right-of-way through his property to the Southern Pacific Railroad, which constructed a new rail line that served to connect new communities to Los Angeles. In 1886, at the dawn of a regional real estate boom, Burbank became one of 10 directors of the Providencia Land, Water and Development Company (PLWC), a company founded to handle the subdivision and sale of his land. As new settlers flocked to Southern California, Burbank's land was surveyed, platted, and formally named Burbank around this time. Early development in the town included hotels, a train depot, a school, and residential and manufacturing buildings. PLWC began to sell tracts of land in late 1887, and buyers were primarily farmers who grew vineyards, peaches, melons, alfalfa and various other types of vegetables. A period of drought followed; the real estate bubble burst and an economic depression occurred between 1888 and 1911 (GPA 2009).

By 1910, Burbank's population had reached 12,225 people, with approximately 700 to 800 people living within its core. The City of Burbank was formally incorporated the following year and proceeded to expand in all directions. During the 1910s and 1920s the City's commercial core strengthened, residential development increased, industry grew, and additional infrastructure was developed. As the City's population increased, land was annexed into the City, and farmland was converted to residential tracts. Film companies that had started moving to the West Coast because of the favorable weather had begun establishing studios in Los Angeles County by the late 1910s. Having large areas of undeveloped land, Burbank became a prime location for these companies, including First National Pictures (a predecessor to Warner Bros.), which developed a studio in Burbank in 1926 (GPA 2009).

Although residential development in the area faltered during the Great Depression, the 1930s saw the development of an airport, the United Air Terminal, and continued success of the movie studios in Burbank. Columbia Ranch studio was established in 1934, Warner Bros. expanded, and Disney Studios established their facility in 1938, all of which are located in the Specific Plan Area. Building construction increased by the late 1930s during a period of economic recovery. Numerous residences were constructed, a segment of the Hollywood Freeway was completed, and populations increased. By 1940, the City had over 34,000 residents. World War II brought a surge in production at companies, such as Lockheed. During this period, several small aircraft-related manufacturing facilities were

developed near the airport, east of Hollywood Way and north of Empire Avenue. These were typically single-story corrugated metal buildings with gabled roofs. The City also experienced a large population spike, growing to 53,899 residents by August 1942. Resultingly, residential, commercial, and institutional development also increased to support these expanded populations (GPA 2009).

Burbank experienced tremendous growth following World War II, including housing, schools, public buildings, and freeways. Studios focused on television production, and air travel grew in popularity. In 1962, the National Broadcasting Company (NBC) moved its network television headquarters to the City. In line with regional trends, the Post-World War II-era boom led to decentralization of the population, negatively affecting the downtown commercial district. A lull in development occurred in the late 1960s to early 1970s, but, in 1978, the Burbank-Glendale-Pasadena Airport (now Hollywood Burbank Airport) was purchased from Lockheed. In 1990, Lockheed closed its Burbank plant (GPA 2009). Today, the City is known as the "Media Capital of the World" in reference to its longstanding relationships with entertainment companies, such as Warner Bros. and Disney (City of Burbank 2017).

b. Development History of the Specific Plan Area

A review of historical topographical maps, historical aerial photographs, and assessor data was completed to characterize developmental patterns within the Specific Plan Area. Generally, the Specific Plan Area experienced limited agricultural development by the late 19th century, saw the beginnings of mass housing construction by the late 1920s, and was subject to intensive urbanization between the 1940s and 1950s. Much development followed the establishment of industry in the Specific Plan Area in the 20th century, specifically major motion picture studios. Although development of the Specific Plan Area began by the 1890s, assessor parcel data shows there are few existing properties in the area constructed prior to the 1930s.

The earliest United States Geological Survey (USGS) map of the Specific Plan Area, dated 1894, shows the Specific Plan Area was a primarily agricultural zone then on the outskirts of the Burbank proper. It depicts sparse development scattered along a road network that includes many of the thoroughfares in the area. However, buildings depicted on the map are far more numerous north of the West Olive Avenue and West Alameda Avenue intersection than they are to the south (USGS 1894). The earliest available aerial photographs of the area show the pattern of relatively sparse agricultural development maintained into the late 1920s though several clusters of non-farm single-family residences were also present (UCSB 1927a, 1927b, 1928).

Historical aerial photographs and assessor construction data indicate that residential and commercial development intensified in the Specific Plan Area in the 1940s and 1950s, contributing to Burbank's wider growth in the World War II and early Post-World War II eras. By 1944, west of North Hollywood Way within the Specific Plan Area, development was densest, consisting largely of residential neighborhoods situated near the Warner Bros. Ranch and Warner Bros. Studios lots. Commercial development was evident as well although the frontages of major commercial arteries, such as West Olive Avenue, West Alameda Avenue, Riverside Drive, remained largely vacant at the time. Outside Disney Studios, the east side of the Specific Plan Area remained comparatively undeveloped, with evidence of vacant parcels and small farms (UCSB 1944a, 1944b, 1944c). Over the following eight years, development continued such that few sizable undeveloped tracts remained within the Specific Plan Area. Development was characterized mostly by single-family residences, apartments, and small- to moderate-sized commercial properties (NETR Online 2024).

Single-family residence developed in the Specific Plan Area in the decade and a half after the end of World War II tended to consist of relatively modest examples of Ranch- and Minimal Traditional-style architecture. Apartment buildings tended to be developed at the fringes of single-family areas,

situated along thoroughfares, and included, among other types, dingbat-type buildings. Dingbat apartment buildings are characterized by their stucco-box form with ornamental elements concentrated on front-facing elevation. A good example of a dingbat apartment building in the Specific Plan Area is the Starlet at 4100 Warner Boulevard. Other development on thoroughfares was mainly commercial. Notable among commercial developments of the time was the growing number of businesses catering to motorists, including car washes and restaurants with drive-in or drive-thru accommodations (GPA 2009). Many automobile-oriented businesses of the era employed Googie-style architectural features and signage that characteristically featured such elements as exaggerated rooflines, geometric forms, extensive glass expanses, neon lighting, and bold shapes such as stars and boomerang. Located in the Specific Plan Area, the Riverside Car Wash at 3700 West Lakeside Boulevard, features a Googie-influenced freestanding sign with a dramatically curved arrow pointing toward the interior of the property (Rincon 2021).The notable exception to the period's pattern of small developments was the area southeast of the West Olive Avenue and West Alameda Avenue intersection, where the Burbank Studios and Johnny Carson Park are now located. Development of Burbank Studios was underway by 1954. A large portion of the existing properties in the Specific Plan Area date to the 1940s and 1950s (NETR Online 2024).

In the 1960s and early 1970s, all but a few remaining vacant lots in the Specific Plan Area were gradually developed. The most notable change to the Specific Plan Area in these years was the development of State Route 134 (SR-134), which traverses the Specific Plan Area on a roughly east-west alignment. The development of commercial office nodes along SR-134 and West Alameda Avenue began by the mid-1980s, a trend that has continued to the present. Elsewhere, however, development patterns have remained relatively consistent since the mid-20th century, outside the expansion of some studio facilities and piecemeal redevelopment of smaller properties throughout the Specific Plan Area (NETR Online 2024).

c. Known and Potential Historical Resources

California Historical Resources Information System Records Search

On September 17, 2025, Rincon received California Historical Resources Information System (CHRIS) records search results from the South Central Coastal Information Center (SCCIC). The SCCIC is the official state repository for cultural resources records and reports for the county in which the project falls. The purpose of the records search was to identify previously recorded cultural resources, as well as previously conducted cultural resources studies within the project site. Rincon also reviewed the NRHP, the CRHR, and the Built Environment Resources Directory (BERD). Additionally, Rincon reviewed the Archaeological Determination of Eligibility (ADOE) list.

Known Cultural Resources Studies

The CHRIS records search and background research identified seven cultural resources studies within the Specific Plan Area. The studies were all focused on a limited geographical scope and did not provide useful historical context regarding habitation and development of the Specific Plan Area. Known studies that occurred within the Specific Plan Area are detailed below in Table 4.4-1.

Table 4.4-1 Known Cultural Resources Studies Identified During the Cultural Resources Search

SCCIC Report No.	Author	Year	Study	Relationship to Project Site
LA-04909	Atchley, Sara M.	2000	Cultural Resources Investigation for the Nextlink Fiber Optic Project, Los Angeles and Orange Counties, California	Within
LA-05021	Iverson, Gary	1999	Negative Archaeological Survey Report: 18850K	Within
LA-06450	Nicol, David A.	2000	Section 106/HPSR for Route 134/Hollywood Way Ramp Improvements	Within
LA-06724	McKenna, Jeanette A., R.C. Ferguson, Larisa Reithmeiner, and M. Abraham Snow	2001	Cultural Resources Investigations and Building Evaluations for the Proposed Burbank Media Center Project Area in the City of Burbank, Los Angeles County, California	Within
LA-06750	Harbert, Claudia	1999	Historic Property Survey Report for Proposed Ramp Improvements for Sr-134 at Hollywood Way in Burbank, Los Angeles County	Within
LA-06750	Harbert, Claudia	1999	Historic Architectural Survey Report for SR-134 at Hollywood Way in Burbank, Los Angeles County Traffic Management Enhancement Projects Westbound State Route 134 at Hollywood Way Reconfigure Off-Ramp	Within
LA-07840	Sylvia, Barbara	2001	Negative Archaeological Survey Report for the Beautification and Modernization Along Route 134 From the 134/170 Separation to Shoup Ave Uc, and Along Route 101 From the 101/170 Separation to Concord Street Uc	Within

Source: NWIC, January 2020

Known Cultural Resources

The CHRIS records search identified 13 cultural resources within the Specific Plan Area. The resources are listed in Table 4.4-2 and discussed in further detail below. No known burial sites have been filed with the CHRIS.

Table 4.4-2 Known Cultural Resources Identified During the Cultural Resources Search

Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	Eligibility Status	Relationship to Project Site
P-19-150413	–	AH1. Unknown (Site); HP39. Other	Site of Rancho Providencia Adobe	1978 (B. Edberg)	Not evaluated	Within
P-19-150414	–	AH1. Unknown	Triunfo's Adobe	1978 (B. Edberg)	Not evaluated	Within
P-19-186526	–	HP6. 1-3 story commercial building	Bob's Big Boy Restaurant and Sign	Anonymous, 1992	5S1	Within
P-19-186660	–	HP6. 1-3 story commercial building	Commercial property, APN 2483-023-427	2001 (J. McKenna)	6Z	Within
P-19-186661	–	HP3. Multiple family property	Residential property, APN 2483-023-429	2001 (J. McKenna)	6Z	Within
P-19-186662	–	HP3. Multiple family property	Residential property, APN 2483-023-429	2001 (J. McKenna)	6Z	Within
P-19-186663	–	HP6. 1-3 story commercial building	Residential Property, APN 2438-023-434	2001 (J. McKenna)	6Z	Within
P-19-186664	–	HP3. Multiple family property	3150 West Alameda Avenue; APN 2438-023-425	2001 (J. McKenna) 1999 (Claudia A. Harbert)	6Z	Within
P-19-186665	–	HP3. Multiple family property	APN 2438-024-901	2001 (J. McKenna)	6Z	Within
P-19-186666	–	HP2: Single-family property	115 North Avon Street; APN 2483-024-406	2001 (J. McKenna) 1999 (Claudia A. Harbert)	6Z	Within
P-19-186667	–	HP3. Multiple family property	APN 2438-023-435	2001 (J. McKenna)	6Z	Within
P-19-190897	–	HP11. Engineering Structure (District)	Los Angeles River Channel, Glendale Narrow Section	2013 (Dana Slawson); 2022 (Scott Thompson)	2S2	Within
P-19-193572	–	HP11. Engineering Structure (Element of District)e	Los Angeles River Channel	2021 (Scott Thompson)	3D	Within

2S2: Individually determined eligible for NRHP by consensus through Section 106 process. Listed in the CRHP/

3D Appears eligible for NRHP as a contributor to a NRHP eligible multi-component resource through survey evaluation.

5S1: Individually listed or designated locally.

6Z: Found ineligible for NRHP, CRHP or local designation through survey evaluation

Source: SCCIC 2025

RESOURCE P-19-150413

Resource P-19-150413 was recorded by Bob Edberg in 1978 as the site of the Rancho Providencia Adobe. The record notes the adobe was the ranch house of the Rancho Providence and that the site is "under the Warner Brothers film lot, possibly intact" (Edberg 1978). The site is located within the Specific Plan Area, near the center of the Warner Brothers Studio.

RESOURCE P-19-150414

Resource P-19-150414 was recorded by Bob Edberg in 1978 as the site of Triunfo's Adobe. The record notes the adobe was the adobe residence of Jose Miguel Triunfo and was observed to be in ruins in 1868. According to the site record, the building was located under the northwest quadrant of the Walt Disney Studios (Edberg 1978).

RESOURCE P-19-186526

Recorded in 1992, Resource P-19-186526 is Bob's Big Boy Restaurant and Sign. The resource record consists of the State Point of Historical Interest nomination form for the property. Constructed in 1949, the building was designed by architect Wayne McAllister in a "transitional design" exhibiting elements of the Streamline Moderne style, "while anticipating the exuberance of freeform [1950s] coffee shop architecture" (Anonymous 1992). In addition to the restaurant building, the adjacent sign is considered "integral" to the property's design.

RESOURCE P-19-186660

This resource, named APN 2483-023-427, was recorded in 2001 by Jeanette A. McKenna as part of the Cultural Resources investigations and Building Evaluations for the Proposed Burbank Media Center project area. The resource record describes the property, located at 3412 West Olive Avenue, as a multi-unit commercial building constructed in 1948. The property was recommended ineligible for any applicable register as a result of the 2001 recordation (McKenna 2001a).

RESOURCE P-19-186661

This resource, named APN 2438-023-429, was recorded in 2001 by Jeanette A. McKenna as part of the Cultural Resources investigations and Building Evaluations for the Proposed Burbank Media Center Project Area. The resource record describes the property, located at 3408 West Alameda Avenue, as a multi-unit residential property constructed in 1950 in the style of a "1950s cottage" (McKenna 2001b). The property was recommended ineligible for any applicable register as a result of the 2001 recordation (McKenna 2001).

RESOURCE P-19-186662

This resource, named APN 2438-023-434, was recorded in 2001 by Jeanette A. McKenna as part of the Cultural Resources investigations and Building Evaluations for the Proposed Burbank Media Center Project Area. The resource record describes the property, located at 116-118 North Avon street, as a residential duplex constructed in 1948 in the style of a "Post WWII cottage" (McKenna 2001c). The property was recommended ineligible for any applicable register as a result of the 2001 recordation (McKenna 2001d).

RESOURCE P-19-186663

This resource, named APN 2438-023-425, was recorded in 2001 by Jeanette A. McKenna as part of the Cultural Resources investigations and Building Evaluations for the Proposed Burbank Media Center Project Area. The resource record describes the property, located at 3413 South Olive Avenue, as a utilitarian commercial block constructed in 1948. The property was recommended ineligible for any applicable register as a result of the 2001 recordation (McKenna 2001d).

RESOURCE P-19-186664

This resource was first recorded in 1999 by Claudia Harbert as part of the Historic Architectural Survey Report of SR-134/Hollywood Way (Media District) Ramp Improvements report. The 1999 recordation describes the property as a Minimal Traditional-style multi-family residential property located at 3510 West Alameda Avenue and recommends it ineligible for inclusion in the NRHP (Harbert 1999a). The property was also recorded in 2001 by Jeanette A. McKenna as part of the Cultural Resources investigations and Building Evaluations for the Proposed Burbank Media Center Project Area. The resource record describes the property as a residential triplex constructed in 1941 in the style of a "cottage"(McKenna 2001e). The property was recommended ineligible for any applicable register as a result of the 2001 recordation (McKenna 2001e).

RESOURCE P-19-186665

This resource, named APN 2438-024-901, was recorded in 2001 by Jeanette A. McKenna as part of the Cultural Resources investigations and Building Evaluations for the Proposed Burbank Media Center Project Area. The resource record describes the property, located at 3516 West Alameda Avenue, as a three-building apartment complex constructed in 1948. The property was recommended ineligible for any applicable register as a result of the 2001 recordation (McKenna 2001f).

RESOURCE P-19-186666

This resource was first recorded in 1999 by Claudia Harbert as part of the Historic Architectural Survey Report of SR-134/Hollywood Way (Media District) Ramp Improvements report. The 1999 recordation describes the property as an English Cottage-style single-family residential property located at 115 North Avon Street and recommends it ineligible for inclusion in the NRHP (Harbert 1999b). The property was also recorded in 2001 by Jeanette A. McKenna as part of the Cultural Resources investigations and Building Evaluations for the Proposed Burbank Media Center Project Area. The resource record describes the property as a single family residence constructed in 1932 in the French Provincial style. The property was recommended ineligible for any applicable register as a result of the 2001 recordation (McKenna 2001g).

RESOURCE P-19-186667

This resource, named APN 2438-023-435, was recorded in 2001 by Jeanette A. McKenna as part of the Cultural Resources investigations and Building Evaluations for the Proposed Burbank Media Center Project Area. The resource record describes the property, located at 112 North Avon Street, as residential duplex constructed in 1930 in an Early California Ranch style. The property was recommended ineligible for any applicable register as a result of the 2001 recordation (McKenna 2001h).

RESOURCE P-19-190897

This resource, Los Angeles River Channel, Glendale Narrow Section, was first recorded in 2013 by Dana Slawson as part of the Historic Property Evaluation report for the North Atwater Crossing Project. The resource is a seven-mile-long section of the Los Angeles River Channel located partially within the current project area. The 2013 recordation recommended the channel segment ineligible for the NRHP, CRHR, and applicable local registers due to a lack of historical and engineering significance (Slawson 2013).

In 2022, Scott Thompson evaluated the entirety of the Los Angeles River Channel, recommending it eligible for listing in the NRHP under Criteria A and C. Under Criterion A, the resource is eligible because the construction of the Los Angeles River Channel "directly influenced the settlement and economic development of the City of Los Angeles and neighboring communities along the length of the [channel]" (Thompson 2022). The resource was recommended eligible under Criterion C, "given the scale and geographic extent of the channelization and the fact that it represents the first implementation of a fully concrete-lined river designed specifically to manage unique flood condition" (Thompson 2022). The 2022 resource record shows the Los Angeles River Channel was assigned an Office of Historic Preservation status code of 2S2, meaning it was determined eligible for inclusion on the NRHP and automatically listed on the CRHR. A map provided with the resource record indicates a short segment of the channel is located within the southern end of the current project area, immediately south of the Warner Brothers Studios.

RESOURCE P-19-193572

This resource is Los Angeles River Channel (Reach 1), a segment of the Los Angeles River Channel, starting roughly at Niagara Street in Burbank and extending 1.7 miles to the east, terminating near Lankershim Boulevard in Studio City. In 2021, Scott Thompson recorded the channel segment as an element of a historic district consisting of an unspecified portion of the Los Angeles River Channel. The 2021 record recommends the Los Angeles River Channel eligible for listing in the NRHP for reasons consistent with Thompson's 2022 record for Resource P-19-190897, as described above. Under Criterion A, the resource is eligible because the construction of the Los Angeles River Channel "directly influenced the settlement and economic development of the City of Los Angeles and neighboring communities along the length of the [channel]" (Thompson 2021). The resource was recommended eligible under Criterion C, "given the scale and geographic extent of the channelization and the fact that it represents the first implementation of a fully concrete-lined river designed specifically to manage unique flood condition" (Thompson 2021). A map provided with the resource record indicates a portion of this resource is immediately adjacent to the southern boundary of the current project area, and a short segment of the channel is located within the southern end of the current project area, immediately south of the Warner Brothers Studios.

Known and Potential Historical Resources Identified through Background Research

To identify resources with the potential to be impacted by future development projects under the proposed Project, a review of the following sources was conducted: NRHP, CRHR, California Landmarks and Points of Historical Interest, California Office of Historic Preservation Built Environment Resource Directory, and the City's list of historic properties and other historical resources documentation, including the 1999 City Preservation Plan (San Buenaventura Associates 1999), Citywide Historic Context Report (GPA 2009), and Historic Sign Survey (ARG 2014). Additionally, Rincon performed a review of historic period aerial imagery and of Los Angeles County assessor data

to identify parcels within the Specific Plan Area that constitute historic-aged resources so that their potential to be impacted by the Project could be assessed. For the purposes of this study, a historic-aged resource is any property in the Specific Plan Area that is 45 years or more of age that has not previously been evaluated for historical significance.

The background research described above identified one formally designated property within the Specific Plan Area, the Bob's Big Boy Restaurant and Sign at 4211 Riverside Drive, which was designated as a California Point of Historical Interest in 1992. While California Office of Historic Preservation guidance provides that Points of Historical Interest designated prior to December 1997 do not qualify as historical resources pursuant to CEQA, the City of Burbank Historic Preservation Regulations[1] note that designated California Points of Historical Interest are considered locally designated resources, and locally designated resources are considered historical resources pursuant to CEQA. Therefore, the Bob's Big Boy Restaurant and Sign is considered a historical resource pursuant to CEQA.

In addition, background research identified one property located within the Specific Plan Area that has been formally evaluated and recommended eligible for NRHP, CRHR, and local eligibility and, therefore, qualifies as a historical resource pursuant to CEQA: the Lakeside Car Wash sign, located at 3700 West Riverside Drive. The Lakewood Car Wash, including the car wash building and free-standing sign, was previously recommended eligible for the NRHP, CRHR, and local listing in Burbank in 2022. Under NRHP Criterion A, CRHC Criterion 1, and local Criterion A, it is significant as a rare intact example of a car wash dating to the 1950s, a period during which Burbank saw a rapid rise in automobile-oriented commercial properties. Under NRHP Criterion C, CRHC Criterion 3, and local Criterion C as an excellent example of the post-World War II car wash property type exhibiting a unique blending of Ranch, Mid-Century Modern, and Googie-style architectural elements (Rincon 2021).

The background research did not identify any additional properties within the Specific Plan Area that qualify as historical resources that are listed in, or previously recommended or determined eligible for, the NRHP or CRHR or as designated by the City as historical resources. However, as described below, there are five properties or collections of properties that may qualify as historical resources, pending future research, and one commemorative resource, as identified below.

The 1999 City Preservation Plan and 2009 Historic Context Report identify four potentially eligible individual resources and one potential historic district in the Specific Plan Area: Warner Bros. Discovery; Walt Disney Studios; a historic district consisting of a row of 1930s bungalows (cross-listed in the 2014 Historic Context Report as Miniature Houses along Hollywood Way); Warner Brothers Office; and Bob's Big Boy Restaurant and Sign, as mentioned above (San Buenaventura Associates 1999, GPA 2009). Although none of these locally identified properties currently qualify as historical resources pursuant to CEQA, future research may find they meet the requirements to qualify as historical resources pursuant to CEQA.

In addition to the resources described above, a segment of San Juan Bautista National Historic Trail passes through the Specific Plan Area along West Alameda Avenue; however, the historic trail designation is strictly commemorative and does not qualify the trail as a historical resource pursuant to CEQA. While these identified properties are in the Specific Plan Area, none are located on an opportunity site. Opportunity sites are groupings of underutilized sites within the Specific Plan Area identified by the City as opportunities for infill and adaptive reuse. Below, Table 4.4-3 identifies the previously identified resources located within the Specific Plan Area.

[1] Formerly called the Historic Resource Management Ordinance under Ordinance No. 3381 [1994]. The titles "Historic Resource Management Ordinance" and "Historic Preservation Regulations" are used interchangeably throughout this section.

Table 4.4-3 Previously Identified Historical Resources Within the Specific Plan Area

Resource Name	Location	Source
Bob's Big Boy Restaurant and Sign	4211 Riverside Drive	California Point of Historical Interest 1992; San Buenaventura Associates 1999; GPA 2009
Los Angeles River Channel	Los Angeles River, south of Warner Brothers Studios	Thompson 2021; 2022
Lakeside Car Wash sign	3700 West Riverside Drive	Rincon 2021
Warner Brothers Studios	West Olive Avenue	San Buenaventura Associates 1999; GPA 2009
Walt Disney Studios	560 South Buena Vista Street	San Buenaventura Associates 1999; GPA 2009
Row of 1930s Bungalows	300 Block of Hollywood Way	San Buenaventura Associates 1999; GPA 2009
Warner Brothers Office	4000 West Warner Boulevard	San Buenaventura Associates 1999; GPA 2009
San Juan Bautista National Historic Trail	Along Alameda Avenue within the Specific Plan Area	National Park Service 2020

In addition to the previously identified properties discussed above, there are many historic-aged resources located throughout the Specific Plan Area that have not yet been subject to a historical evaluation. A review of Los Angeles County assessor data and historical aerial photographs reveals there are currently 203 opportunity site parcels in the Specific Plan Area containing historic-aged resources, including properties containing a building developed in or before 1978 Additionally, a review of historical aerial photographs indicates there are several non-opportunity site parcels containing historic-aged resources throughout the rest of the Specific Plan Area. Table 4.4-4 identifies when development occurred on opportunity site parcels.

Table 4.4-4 Years When Opportunity Site Parcels Were Developed

Address	APN	Development Year(s)
3701 W Oak Street	2482-001-003	1926, 1936, 1938, 1944, 1965
511 N Hollywood Way	2482-001-004	1975
509 N Hollywood Way	2482-001-005	1975, 1976, 1977, 1978
321 N Pass Avenue	2482-007-007	1962
317 N Pass Avenue	2482-007-008	1962
311 N Pass Avenue	2482-007-009	1962
337 N Pass Avenue	2482-007-010	1962, 1982
No Address	2482-007-011	1962
301 N Pass Avenue	2482-007-012	1962, 1967
255 N Pass Avenue	2482-007-013	1963
No Address	2482-007-014	1985
4009 W Heffron Drive	2482-008-003	1949
4005 W Heffron Drive	2482-008-004	1942
4001 W Heffron Drive	2482-008-005	1941
300 N Maple Street	2482-008-015	1947

Address	APN	Development Year(s)
3915 W Heffron Drive	2482-008-016	1940
3909 W Heffron Drive	2482-008-017	1948
3905 W Heffron Drive	2482-008-018	1948
3901 W Heffron Drive	2482-008-019	1948, 1951
3916 W Oak Street	2482-008-025	1953
3906 W Oak Street	2482-008-026	1950
317 N Kenwood Street	2482-008-031	1939, 1954
316 N Maple Street	2482-008-035	1986
330 N Maple Street	2482-008-037	1982
333 N Kenwood Street	2482-008-045	1982
316 N Pass Avenue	2482-008-055	2001
355 N Maple Street, 101	2482-008-058	1985
355 N Maple Street, 229	2482-008-119	1985
310 N Pass Avenue	2482-008-140	2006
312 N Pass Avenue	2482-008-141	2012
215 N Screenland Drive	2482-009-001	1951
3800 W Heffron Drive	2482-009-005	1948
3802 W Heffron Drive	2482-009-006	1948
3808 W Heffron Drive	2482-009-007	1959
3812 W Heffron Drive	2482-009-008	1951
3816 W Heffron Drive	2482-009-009	1949
221 N Screenland Drive	2482-009-013	2001
3900 W Heffron Drive	2482-009-017	1946, 1959
3908 W Heffron Drive	2482-009-019	1948
3914 W Heffron Drive	2482-009-020	1940, 2006
248 N Maple Street	2482-009-021	1948
239 N Maple Street	2482-009-025	1984
246 N Pass Avenue	2482-009-026	1951
247 N Maple Street	2482-009-027	1953
251 N Maple Street	2482-009-028	1947, 1951
4004 W Heffron Drive	2482-009-029	1947
260 N Pass Avenue	2482-009-034	1982
3904 W Heffron Drive	2482-009-035	1988
230 N Kenwood Street	2482-009-048	1990
3815 W Heffron Drive	2482-010-002	1951
3811 W Heffron Drive	2482-010-003	1939
3805 W Heffron Drive	2482-010-004	1947
3803 W Heffron Drive	2482-010-005	1952
312 N Kenwood Street	2482-010-006	1944, 1954
316 N Kenwood Street	2482-010-007	1949

Address	APN	Development Year(s)
320 N Kenwood Street	2482-010-008	1939
324 N Kenwood Street	2482-010-009	1938, 1959
330 N Kenwood Street	2482-010-010	1940, 1953
334 N Kenwood Street	2482-010-011	1947
336 N Kenwood Street	2482-010-012	1949
340 N Kenwood Street	2482-010-013	1951
308 N Kenwood Street	2482-010-024	1989
333 N Screenland Drive	2482-010-025	1988
312 N Screenland Drive	2482-011-029	1939, 2002
310 N Screenland Drive	2482-011-030	1941
304 N Screenland Drive	2482-011-031	1949
300 N Screenland Drive	2482-011-032	1955
330 N Screenland Drive	2482-011-034	1987
206 N Screenland Drive	2482-012-001	1982
3710 1/2 W Heffron Drive	2482-012-013	1948
234 N Screenland Drive	2482-012-014	1963
230 N Screenland Drive	2482-012-015	1947, 1963
226 N Screenland Drive	2482-012-016	1939, 1947
222 N Screenland Drive	2482-012-017	1947
216 N Screenland Drive	2482-012-018	1948
212 N Screenland Drive	2482-012-019	1947, 1964
210 N Screenland Drive	2482-012-020	1947
200 N Cordova Street	2483-014-400	1948
3515 W Alameda Avenue	2483-014-401	1948
3513 W Alameda Avenue	2483-014-402	1959
3511 W Alameda Avenue	2483-014-403	1948
3509 W Alameda Avenue	2483-014-404	1948
3507 W Alameda Avenue	2483-014-405	1947
3505 W Alameda Avenue	2483-014-406	1950
3503 W Alameda Avenue	2483-014-407	1951
3501 W Alameda Avenue	2483-014-408	1952
3417 W Alameda Avenue	2483-016-400	1951
3413 W Alameda Avenue	2483-016-401	1950
3409 W Alameda Avenue	2483-016-402	1950
3405 W Alameda Avenue	2483-016-403	1941
201 N Lima Street	2483-016-404	1957
200 N Lima Street	2483-018-400	1950
3317 W Alameda Avenue, Unit B	2483-018-401	1950
3315 W Alameda Avenue	2483-018-402	1952
3311 W Alameda Avenue	2483-018-403	1954

Address	APN	Development Year(s)
3307 W Alameda Avenue	2483-018-404	1947
3305 W Alameda Avenue	2483-018-405	1953
3303 W Alameda Avenue	2483-018-406	1949
201 N California Street	2483-018-407	1949
3121 W Olive Avenue	2483-021-006	1964
3117 W Olive Avenue	2483-021-007	1941
3115 W Olive Avenue	2483-021-008	1942
3113 W Olive Avenue	2483-021-009	1954
No Address	2483-021-010	1953
3111 W Olive Avenue	2483-021-011	1990
No Address	2483-021-012	1953
3219 W Alameda Avenue	2483-022-400	1952
3211 W Alameda Avenue	2483-022-401	1951
3209 W Alameda Avenue	2483-022-402	1949
3207 W Alameda Avenue	2483-022-403	1948
3205 W Alameda Avenue	2483-022-404	1951
3203 W Alameda Avenue	2483-022-405	1969
3203 W Alameda Avenue	2483-022-406	1969
No Address	2483-023-419	Vacant
No Address	2483-023-420	Vacant
3321 W Olive Avenue	2483-023-421	Vacant
No Address	2483-023-422	Vacant
3320 W Alameda Avenue	2483-023-431	Vacant
No Address	2483-023-432	Vacant
3425 Olive Avenue	2483-024-417	2019
3514 West Alameda Avenue	2483-024-908	Ca. 1985
No Address	2483-024-909	Vacant
3514 West Alameda Avenue	2483-024-910	Ca. 1952
2520 W Olive Avenue	2484-019-001	1964
125 S Buena Vista Street	2484-019-013	1937
171 S Buena Vista Street	2484-019-017	2006
181 S Buena Vista Street	2484-019-018	2009
201 S Buena Vista Street	2484-019-019	2004
191 S Buena Vista Street	2484-019-020	2008
232 S Naomi Street	2484-021-005	Vacant
238 S Naomi Street	2484-021-006	1987
2603 W Alameda Street	2484-021-013	1987
2625 W Alameda Avenue	2484-021-014	1977
2727 W Alameda Avenue	2484-021-015	1968
2701 W Alameda Avenue	2484-021-016	1968

Address	APN	Development Year(s)
2601 W Alameda Avenue	2484-021-018	1987
Northwest corner of Willow Street and S Naomi Street	2484-021-900	Ca. 1972
2721 W Willow Street	2484-022-001	1985
2707 W Willow Street	2484-022-003	1927
2710 W Olive Avenue	2484-022-004	1963
2704 W Olive Avenue	2484-022-005	1950
2700 W Olive Avenue	2484-022-006	2011
2600 W Olive Avenue	2484-022-011	1986
2614 W Olive Avenue	2484-022-012	1955
No Address	2484-022-013	Vacant
3020 W Olive Avenue	2484-023-001	1955
3000 W Olive Avenue	2484-023-002	1960
2820 W Olive Avenue	2484-023-005	1938, 1948
2813 W Alameda Avenue	2484-023-006	1963, 1981
2800 W Olive Avenue	2484-023-008	1998
2920 W Olive Avenue	2484-023-009	1958
No Address	2484-023-010	Vacant
2921 W Alameda Avenue	2484-023-011	1951
2901 W Alameda Avenue	2484-023-013	1981
2800 W Olive Avenue	2484-023-014	1938
No Address	2484-023-270	Vacant
3201 W Olive Avenue	2484-024-401	Vacant
4021 W Alameda Avenue	2485-002-010	1962
214 N Pass Avenue	2485-002-022	1975
4001 W Alameda Avenue	2485-002-024	1972, 1973
3921 W Alameda Avenue	2485-002-025	1957
3917 W Alameda Avenue	2485-002-026	1957
3907 W Alameda Avenue	2485-002-027	1978
211 N Maple Street	2485-002-028	1973
4017 W Riverside Drive	2485-003-001	1936
4013 W Riverside Drive	2485-003-002	1948
4011 W Riverside Drive	2485-003-003	1950, 1970
4009 W Riverside Drive	2485-003-004	1952
4007 W Riverside Drive	2485-003-005	1950
4005 W Riverside Drive	2485-003-006	1960
4001 W Riverside Drive	2485-003-007	1948
3919 W Riverside Drive	2485-003-016	1961
3913 W Riverside Drive	2485-003-019	1949
3911 W Riverside Drive	2485-003-020	1955
3901 W Riverside Drive	2485-003-021	1961

Address	APN	Development Year(s)
4000 W Alameda Avenue	2485-003-022	1982,1983
3900 W Alameda Avenue, STE2110	2485-003-032	1989
3915 W Riverside Drive	2485-003-033	1950
3701 W Riverside Drive	2485-004-018	1989
3800 W Alameda Avenue	2485-004-042	1984
3820 W Riverside Drive	2485-005-001	2009
3820 W Riverside Drive	2485-005-002	1965
3820 W Riverside Drive	2485-005-003	1965
3700 W Riverside Drive	2485-005-004	1956
115 N Hollywood Way	2485-005-005	1997
111 N Hollywood Way	2485-005-006	1979
108 N Kenwood Street	2485-005-012	1951
3817 W Olive Avenue	2485-005-013	1967
3700 W Riverside Drive	2485-005-014	1956
134 N Screenland Drive	2485-005-015	1938
3800 W Riverside Drive	2485-005-016	Ca. 1972
3808 W Riverside Drive	2485-005-017	1964
No Address	2485-005-018	1965
123 N Screenland Drive	2485-005-019	1967
No Address	2485-005-020	1967
115 N Screenland Drive	2485-005-021	1969
109 N Screenland Drive	2485-005-022	1948
126 N Screenland Drive	2485-005-023	Vacant
No Address	2485-005-024	1959
3805 W Olive Avenue	2485-005-024	Vacant
3723 W Olive Avenue	2485-005-030	1964
134 N Kenwood Street	2485-005-035	1986
128 N Kenwood Street, Number 1	2485-005-039	1978
128 N Kenwood Street, Number 3	2485-005-041	1978
No Address	2485-005-049	1979
3815 W Olive Avenue	2485-005-050	1979
3601 W Olive Avenue	2485-005-055	1985
115 N Kenwood Street	2485-006-010	1944
119 N Kenwood Street	2485-006-011	1947
125 N Kenwood Street	2485-006-012	1944
129 N Kenwood Street	2485-006-013	1944
133 N Kenwood Street	2485-006-014	1947
137 N Kenwood Street	2485-006-015	Ca. 1954
146 N Maple Street	2485-006-016	1944
142 N Maple Street	2485-006-017	1947

Address	APN	Development Year(s)
140 N Maple Street	2485-006-018	1947
136 N Maple Street	2485-006-019	1944
132 N Maple Street	2485-006-020	1944
126 N Maple Street	2485-006-021	1944
124 N Maple Street	2485-006-022	1949
3900 W Riverside Drive	2485-006-025	1947
150 N Maple Street	2485-006-029	1944
141 N Kenwood Street	2485-006-030	1938
3903 W Olive Avenue	2485-006-043	1979
3910 W Riverside Drive	2485-006-044	2003
120 N Maple Street	2485-006-045	1979
4000 W Riverside Drive	2485-007-001	1949
4002 W Riverside Drive	2485-007-002	1949
4004 W Riverside Drive	2485-007-003	1950, 1954
4006 W Riverside Drive	2485-007-004	1946
4008 W Riverside Drive	2485-007-005	1951
4010 W Riverside Drive	2485-007-006	1946
4020 W Riverside Drive	2485-007-007	1984
154 N Pass Avenue	2485-007-008	1953
148 N Pass Avenue	2485-007-010	1941
144 N Pass Avenue	2485-007-011	1941
140 N Pass Avenue	2485-007-012	1941
136 N Pass Avenue	2485-007-013	1941
132 N Pass Avenue	2485-007-014	1941
128 N Pass Avenue	2485-007-015	1941
124 N Pass Avenue	2485-007-016	1941
120 N Pass Avenue	2485-007-017	1941
116 N Pass Avenue	2485-007-018	1944
112 N Pass Avenue	2485-007-019	Vacant
115 N Maple Street	2485-007-028	1944
119 N Maple Street	2485-007-029	1944, 1952
123 N Maple Street	2485-007-030	1944, 1965
129 N Maple Street	2485-007-031	1941, 1948
133 N Maple Street	2485-007-032	1948
139 N Maple Street	2485-007-033	1941
143 N Maple Street	2485-007-034	1948
151 N Maple Street, 3	2485-007-045	1987
151 N Maple Street, 8	2485-007-050	1987
121 N Maple Street	2485-007-064	Vacant
4001 W Olive Avenue	2485-007-065	1994

Address	APN	Development Year(s)
3511 Warner Boulevard	2485-024-005	1944
3509 Warner Boulevard	2485-024-006	1944
145 S Avon Street	2485-024-007	1951
141 S Avon Street	2485-024-008	1942
139 S Avon Street	2485-024-009	1961
130 S Cordova Street	2485-024-028	1946
134 S Cordova Street	2485-024-029	1939
3517 Warner Boulevard	2485-024-030	1938, 1952
131 S Avon Street	2485-024-031	Ca. 1939
118 S Cordova Street	2485-024-034	1961
124 Cordova Street	2485-024-035	1941
3500 W Olive Avenue	2485-024-041	1984
3300 W Riverside Drive	2485-024-044	1984
3400 W Riverside Drive	2485-024-045	1988

Sources: Los Angeles County Assessor 2024; San Buenaventura Research Associates 1999; GPA 2024; NETR Online 2024; UCSB 1929, 1939

4.4.2 Regulatory Setting

This section includes a discussion of the applicable federal, state and local laws, ordinances, regulations, and standards governing cultural resources.

a. Federal Regulations

National Environmental Policy Act (NEPA)

NEPA, as amended by the Fiscal Responsibility Act of 2023, P.L. 188-5, establishes the national environmental policy of the federal government and contains procedural requirements to carry out the national environmental policy. Specifically, NEPA requires federal agencies to provide a detailed statement on proposals for major federal actions significantly affecting the quality of the human environment. The purpose and function of NEPA is satisfied if federal agencies have considered relevant environmental information, and the public has been informed regarding the decision-making process. Statute 42 U.S. Code 4331(b)(4) states the congressional declaration of national environmental policy to include "preservation of important historic, cultural, and natural aspects of our national heritage."

Section 106 of the National Historic Preservation Act

The NHPA of 1966 is a landmark piece of U.S. legislation that established a national preservation program and a system of procedural protection, which encourages the identification and protection of historic and archaeological resources at the federal, state, and local levels. The NHPA also introduced Section 106 of the NHPA, which requires federal agencies to consult with the Advisory Council on Historic Preservation (ACHP) to take into account the effects of their undertakings on historic properties. The Section 106 process involves identification of significant historic resources within an Area of Potential Effects (APE); determination if the undertaking will cause an adverse effect on historic properties; and resolution of those adverse effects through execution of a Memorandum

of Agreement or Programmatic Agreement (PA). Regulation 36 CFR Part 800 defines how federal agencies meet these responsibilities, and 36 CFR 800.5(a) describes the process for evaluating a project's adverse effects on historic properties. An adverse effect is found when a federal undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register of Historic Places (NRHP) in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Examples of adverse effects are provided in 36 CFR 800.5(a)(2) and include, but are not limited to:

- Physical destruction of or damage to all or part of the property
- Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR Part 68) and applicable guidelines
- Removal of the property from its historic location
- Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features
- Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization

Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

National Register of Historic Places

The NRHP was authorized by Section 101 of the National Historic Preservation Act and is the nation's official list of cultural resources identified for preservation. The NRHP documents the appearance and importance of districts, sites, buildings, structures, and objects significant in our prehistory and history. Per 36 CFR Part 60.4, a property is eligible for listing in the NRHP if it meets one or more of the following criteria:

Criterion A: Is associated with events that have made a significant contribution to the broad patterns of our history

Criterion B: Is associated with the lives of persons significant in our past

Criterion C: Embodies the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction

Criterion D: Has yielded, or may be likely to yield, information important in prehistory or history

In addition to meeting at least one of the above designation criteria, resources must also retain integrity. The National Park Service recognizes seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several, if not all, of these seven qualities, defined as follows:

Location: The place where the historic property was constructed or the place where the historic event occurred

Design: The combination of elements that create the form, plan, space, structure, and style of a property

Setting: The physical environment of a historic property

Materials: The physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property

Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory

Feeling: A property's expression of the aesthetic or historic sense of a particular period of time

Association: The direct link between an important historic event or person and a historic property

Certain properties are generally considered ineligible for listing in the NRHP, including cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions, relocated structures, or commemorative properties, unless they meet special requirements. Additionally, a property must be at least 50 years of age to be eligible for listing in the NRHP. The National Park Service states that 50 years is the general estimate of the time needed to develop the necessary historical perspective to evaluate significance (National Park Service [NPS] 1997:41). Properties which are less than 50 years must be determined to have "exceptional importance" to be considered eligible for NRHP listing.

b. State Regulations

California Environmental Quality Act

The California Environmental Quality Act (CEQA) requires that a lead agency determine whether a project could have a significant effect on historical resources (Public Resources Code [PRC], Section 21084.1), unique archaeological resources (PRC Section 21083.2[g]), and tribal cultural resources (PRC Sections 21074[a][1][A]-[B]). A historical resource is a resource listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR) (PRC Section 21084.1), a resource included in a local register of historical resources (CEQA Guidelines Section 15064.5[a][2]), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (CEQA Guidelines Section 15064.5[a][3]).

PRC Section 5024.1 outlines how to evaluate historical resources to determine their eligibility for listing in the CRHR. The purpose of the register is to maintain listings of the State's historical resources and to indicate which properties are to be protected from substantial adverse change. The criteria for listing resources in the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the NRHP, as enumerated according to the CEQA Guidelines and quoted below.

Section 15064.5(a)(3) […] "Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code § 5024.1, Title 14 CCR, Section 4852) including the following:

(A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

(B) Is associated with the lives of persons important in our past;

(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

(D) Has yielded, or may be likely to yield, information important in prehistory or history."

Section 15064.5(a)(4) "The fact that a resource is not listed in or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1."

15064.5(b) "A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment."

In addition, if a project can be demonstrated to cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC Sections 21083.2[a], [b], and [c]).

PRC Section 21083.2(g) defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it does one or more of the following:

1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information
2) Has a special and particular quality such as being the oldest of its type or the best available example of its type
3) Is directly associated with a scientifically recognized important prehistoric or historic event or person

Impacts to significant cultural resources that affect the characteristics of any resource that makes it eligible for inclusion in the NRHP or adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. These impacts could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired (CEQA Guidelines Section 15064.5[b][1]). Material impairment is defined as demolition or alteration in an adverse manner of those characteristics of an historical resource that convey its historical significance and that justify its inclusion or eligibility for inclusion in the CRHR (CEQA Guidelines Section 15064.5[b][2][A]).

The requirements for mitigation measures under CEQA are outlined in CEQA Guidelines Section 15126.4(a)(1). In addition to being fully enforceable, mitigation measures must be completed within a defined time period and be roughly proportional to the impacts of the project. Generally, a project

which is found to comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (the Standards) is considered to be mitigated below a level of significance (CEQA Guidelines Section 15126.4 [b][1]). For historical resources of an archaeological nature, lead agencies should also seek to avoid damaging effects where feasible. Preservation in place is the preferred manner to mitigate impacts to archaeological sites; however, data recovery through excavation may be the only option in certain instances (CEQA Guidelines Section 15126.4[b][3]).

Regulations Governing Human Remains

The disposition of Native American human remains is governed by Health and Safety Code Section 7050.5 and PRC Sections 5097.94 and 5097.98 and falls within the jurisdiction of the Native American Heritage Commission (NAHC). If human remains are discovered, the County Coroner must be notified within 48 hours and there may be no further disturbance to the site where the remains were found. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to PRC Section 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment or disposal.

c. Local Regulations

City of Burbank

The City of Burbank Historic Preservation Regulations (Ordinance No. 3381 [1994] and Ordinance No. 3812 [2011]) authorize the City Council to maintain a register of designated historic resources, in addition to regulate changes to designated historic resources made as a result of development projects. Pertinent elements of the Burbank Historic Preservation Regulations are summarized below.

Designated Historic Resource

To be approved as a designated historic resource, the City Council must find that a property meets at least one of the following criteria:

a. It is associated with events that have made a significant contribution to the broad patterns of Burbank's or California's history and cultural heritage.
b. It is associated with the lives of persons important in the past.
c. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
d. It has yielded, or may be likely to yield, information important in prehistory or history.

In addition, as established in Burbank Municipal Code (BMC) Section 10-1-203, resources formally listed on the NRHP or CRHR, or formally designated as National Historic Landmarks, California Historic Landmarks, California Points of Historical Interest are considered as locally designated historic resources.

Procedures and Criteria for Actions Subject to Review (Designated Historic Resources)

Under BMC Section 10-1-928, any work involving the demolition, removal, or other alterations to a locally designated historic resource requires a Permit to Alter a Designated Historic Resource, subject

to certain requirements. Generally, permits are subject to review by the Heritage Commission, which may approve the permit if the proposed work meets the following criteria:

1. The proposed alteration is consistent with the purpose and intent of the City's Historic Preservation Regulations.
2. The proposed alteration will not adversely affect the significance or value of the Designated Historic Resource.
3. The architectural style, design, arrangement, massing, texture, painted and unpainted surfaces, materials, and any other significant factors will not be affected in a way that detracts from the Designated Historic Resource or otherwise decreases the value of the Designated Historic Resource to the community.

Approval of an application may be subject to additional conditions as determined by the Heritage Commission, including changes to the proposed plans for alteration. Decisions of the Heritage Commission may be appealed to the City Council. In addition, exemptions may be granted to permit ordinary maintenance and repair to protect public health and safety, or on the basis of economic hardship if certain findings are made (Ordinance No. 3381 [1994] and Ordinance No. 3812 [2011]).

Criteria for Designation of Historic Districts

BMC Section 10-1-930 provides regulations for the designation of historic districts. Per the regulations, the City Council may designate, upon the recommendation of Heritage Commission and Planning Commission, an area as a historic district if 60 percent of the parcels in the area satisfy one or more of the same eligibility criteria listed below:

1. The contributing resources embody the distinctive characteristics of a type, period, region, or method of construction, represent the work of a master, or possess high artistic values.
2. The contributing resources reflect significant geographical patterns, including those associated with different areas of settlement and growth; particular transportation modes; or distinctive examples of a park landscape, site design, or community planning.
3. The contributing resources are associated with, or are unified by, events that have made a significant contribution to the broad patterns of Burbank's history.
4. The contributing resources are associated with the lives of persons important to local, state, or national history. [Ordinance No. 3826 [2012]).

Procedures and Actions Subject to Review (Historic Districts)

BMC Section 10-1-933, pertains to work proposed for any property within a historic district. Properties within a historic district's boundaries may be contributing, meaning they are identified as historical resources that embody and express historical significance of the district, or non-contributing, meaning although the properties are located in the district, do not embody and express the historical significance and are not historical resources. Under Section 10-1-933 work is categorized as conforming or non-conforming. Conforming work involves changes to contributing properties in a historic district, including that which is limited to ordinary maintenance, revision of non-character-defining interiors, and additions not visible from the public right-of-way, if proposed in a manner consistent with the Standards. Zoning clearances for such work are subject to the review of the Planning Director. All other work involving a contributing property is considered non-conforming and is subject to a Permit to Alter a Contributing Resource. The granting of a permit application for non-

conforming work must document the work's conformity with the Standards and local design guidelines, subject to the review and approval of the Heritage Commission.

Non-conforming work on a non-contributing property requires a Permit to Alter a Non-Contributing Resource, subject to the review of the Planning Director and Heritage Commission. The Heritage Commission may approve the permit if design of new construction shall subtly differentiate the new construction from the surrounding historic built fabric; shall be contextually compatible with the massing, size, scale, and architectural features of nearby structures in the historic district; shall not adversely affect elements which form the basis for the designation of the Historic District (Ordinance No. 3826 [2012]).

Burbank2035 General Plan

The Burbank2035 General Plan, adopted in 2013, includes goals, polices, and programs relating to cultural resources (City of Burbank 2013).

The Burbank2035 General Plan Land Use Element provides the following goal and policies:

Land Use Goal 3: Community Design and Character–Burbank's well-designed neighborhoods and buildings and enhanced streets and public spaces contribute to a strong sense of place and "small town" feeling reflective of the past.

> **Land Use Policy 3.10**: Preserve historic resources, buildings, and sites, including those owned by private parties and government agencies, including the City of Burbank. Alter such resources only as necessary to meet contemporary needs and in a manner that does not affect the historic integrity of the resource.
>
> **Land Use Policy 3.11**: Carefully consider the evolution of community character over time. Evaluate projects with regard to their impact on historic character, their role in shaping the desired future community character, and how future generations will view today's Burbank The Burbank2035 General Plan Open Space and Conservation Element provides the following goals and policies:

Open Space and Conservation Goal 6: Open Space Resources—Burbank's open space areas and mountain ranges are protected spaces supporting important habitat, recreation, and resource conservation.

> **Open Space and Conservation Policy 6.1**: Recognize and maintain cultural, historical, archeological, and paleontological structures and sites essential for community life and identity.

The Burbank2035 General Plan provides the following program for implementation of goals and polices pertaining to the preservation of historical resources:

Program LU-4: **Historic Preservation Plan**–To reduce impacts to both known and as-yet-unknown historical resources within Burbank, the City shall:

- Review, revise, and maintain the Historic Preservation Plan to ensure that it is informed by current resource data and its goals and policies are consistent with the Land Use Element.
- Establish a list of Eligible Historic Resources to be maintained by the Community Development Director. Update the list of Eligible Historic Resources every five (5) years to identify as-yet unknown historical resources (as defined in State CEQA Guidelines Section 15064.5) as potential resources are identified through Citywide surveys and on a project-by-project basis.

- Periodically review and revise the Historic Resource Management Ordinance and preservation incentives to account for new resources as they are identified.
- Require evaluation by a qualified architectural historian for projects subject to CEQA involving buildings constructed more than 45 years prior to the project application. If the evaluation determines that historical resources (as defined in State CEQA Guidelines Section 15064.5) would be adversely affected, the City shall require the proposed project to comply with Section 10-1-928 of the Historic Resource Management Ordinance.
- Require assessment by a qualified archeologist for projects subject to CEQA involving ground-disturbing activities on previously undisturbed land to identify the potential to encounter buried historical resources (as defined in State CEQA Guidelines Section 15064.5). If the assessment determines that buried resources may be present, the City shall require preparation and implementation of a treatment plan outlining measures for monitoring, data recovery, and/or handling inadvertent discoveries.

4.4.3 Impact Analysis

a. Thresholds of Significance

For purposes of this environmental analysis, thresholds of significance are based on the questions in Appendix G of the *CEQA Guidelines*, which states that impacts related to cultural resources would be potentially significant if implementation of the proposed Project would do any of the following:

1. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5.
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.
3. Disturb any human remains, including those interred outside of formal cemeteries.

Thresholds 1 through 3 are analyzed below.

b. Methodology

The analysis in this section is based on a review of the CHRIS records search of the project site as well as a 0.5-mile radius around the project site at the SCCIC and a search of the Sacred Lands File (SLF) with the NAHC.

In accordance with *CEQA Guidelines* Section 15125, "a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence" where necessary to provide the most accurate description of the existing conditions. As such, the SLF search was conducted in 2023 at the time of circulation of the Notice of Preparation; however, due to the preparation time needed to complete the Draft Burbank Media District Specific Plan and Draft EIR, this section and the SCCIC and record searches utilize a baseline year of 2025 in order to provide a more accurate present-day baseline.

The SCCIC records search identified seven previously recorded cultural resources within the Specific Plan Area. On December 26, 2023, the NAHC responded to Rincon's SLF request, stating that the results of the SLF search were positive.

Direct impacts can be assessed by identifying the types and locations of proposed development, determining the exact locations of cultural resources within a project area, assessing the significance

of the resources that may be affected, and determining the appropriate mitigation. Removal, demolition, or alteration of historical resources can permanently impact the historic fabric of an archaeological site, structure, or historic district.

Based on the existing setting described above, the potential for the Project to result in a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5 was assessed by comparing the locations of opportunity sites to the locations of previously identified listed, eligible, and potentially eligible, cultural resources, as described above in *Known and Potential Historical Resources* to determine whether future development facilitated by the proposed Project had the potential to cause direct changes to individual historical resources or direct or indirect changes with a historical district. In addition, the construction dates for each opportunity site was reviewed to determine whether development under the proposed Project would have the potential to affect a property meeting the age requirements to potentially qualify for historical resource status.

c. Project Impacts

Threshold 1:	Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

Impact CUL-1 FUTURE DEVELOPMENT PROJECTS FACILITATED BY THE PROPOSED PROJECT COULD ADVERSELY AFFECT KNOWN HISTORICAL RESOURCES OR THOSE RESOURCES THAT HAVE NOT BEEN IDENTIFIED AS ELIGIBLE FOR LISTING IN THE NRHP OR CRHR. IMPACTS TO HISTORICAL RESOURCES WOULD BE SIGNIFICANT AND UNAVOIDABLE.

The City of Burbank adopted historic preservation regulations (BMC 10-1-925 et seq.) that limit the alteration or demolition of designated historical resources. As described above in Section 4.4.2, *Regulatory Setting*, the City's historic preservation regulations provide procedures for the local designation of historical resources and districts and a permitting process for work affecting a locally designated resource or within a locally designated historic district. Generally, the approval of such permits requires a project applicant to demonstrate any proposed work on an individual historical resource would not substantially alter the historical and architectural significance of the resource. Further, the approval of work within a historical district is generally required to conform with the Standards and/or local design guidelines. Thus, the City's regulations would reduce impacts by requiring that alterations do not cause the loss of the character-defining features of a designated resource or historic district contributor or introduce visibly incompatible elements into locally designated historic district through the alteration of a property located within a district. However, while local regulations discourage the demolition and alteration of locally designated resources or properties within historic districts, exemptions are permitted under certain circumstances which are defined in the regulations and include situations involving alterations qualifying as ordinary maintenance and repair or in situations where there are threats to public health and safety or there is an economic hardship. Under the proposed Project, no designated resources are included as opportunity sites. However, if resources or historic districts within the Specific Plan Area are designated at a future time, the City's historic preservation regulations may permit work involving designated historical resources and historic districts, including alterations, relocations, and demolitions, that would result in significant impacts to historical resources pursuant to CEQA. The research summarized herein indicates that, at the current time, these regulations would apply only to Bob's Big Boy Restaurant and Sign, the Los Angeles River Channel, and the Lakeside Car Wash sign, none of which is located on an opportunity site under the proposed Project. However, the regulations would also be applicable to any resources in the Specific Plan Area designated at a future time. If a

development proposal occurs on a parcel that involves a potential historic resource, the project would be required to undergo an environmental assessment, which would include a historical significance evaluation.

In addition to the regulations that apply to designated historical resources, Program LU-4: Historic Preservation Plan of the Burbank2035 General Plan, including, recommends measures for the evaluation of potential historical resources to determine whether they qualify as historical resources pursuant to CEQA. Development that occurs as a result of the proposed Project would be required to remain in compliance with this program. Adherence to the program would require that any potential historical resources identified as part of future development projects facilitated by the proposed Project would be evaluated for historical significance by a qualified architectural historian or archaeologist prior to development.

The applicable element of Program LU-4 has not been adopted as part of the BMC and is, therefore, recommended as part of Mitigation Measure CUL-1 below.

City of Burbank Historic Resource Management Ordinance and Program LU-4 will require retention of historical resources and regulate their alteration such that they continue to convey their historical significance. However, it is possible that future development under the proposed Project will require the demolition or substantial alteration of a historical resource such that it would cause the material impairment of the historical resource. Therefore, further mitigation, in the form of Historic American Building Survey-like documentation, is required to reduce impacts to the maximum feasible extent.

Mitigation Measure

Mitigation Measure CUL-1 Historical Resource Protection is necessary to reduce impacts to historical resources to the greatest extent feasible.

CUL-1 Protection, Documentation, and Memorialization of Historical Resources

The project proponent shall either:

- Demonstrate to the satisfaction of the City of Burbank Community Development Department that the project does not contain any historic resources either due to the site being vacant, age of the structures on the site, or due to the result of the Program LU-4 Historic Preservation Plan evaluation and assessment; or
- For any structure determined to be eligible for listing in a federal, State, or local registry, or currently listed, as a historic resource (typically determined as a result of the Program LU-4 Historic Preservation Plan process), future development under the proposed Project shall comply with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards). During the planning phase for any future development projects under the proposed Project (prior to any construction activities), input shall be sought from a qualified professional meeting the Secretary of the Interior's Professional Qualifications Standards to ensure compliance of the future development project with the Standards for Rehabilitation. The cost of this assessment shall be borne entirely by the applicant for the future development project. This input shall ensure the avoidance of any direct/indirect physical alterations to historical resources that would result in substantial adverse change to the historical resource. The findings and recommendations of the architectural historian or historic architect shall be documented in a Standards Project Review Memorandum at the schematic design phase. This memorandum shall identify the character-defining features of the historical resource through a review of the building's construction history and analysis of its significant historical and/or architectural

associations and shall subsequently analyze all project components for compliance with the Standards for Rehabilitation. Each future development project's components to be analyzed shall include direct and indirect changes to historical resources and their setting. Should design modifications be necessary to bring projects into compliance with the Standards for Rehabilitation, the memorandum shall document those recommendations, which shall then become conditions of approval for the future development project. The report shall be submitted to the City for review and approval upon submittal of an application for building permits or entitlement.

- It may not be possible to design all future development under the proposed Project involving a historical resource to be consistent with the Standards. Development projects inconsistent with the Standards may include those that require the substantial alteration or demolition of a historical resource. If significant historical resources are identified on an individual development site and compliance with the Secretary of the Interior's Standards or avoidance is not possible, appropriate site-specific mitigation measures shall be established and undertaken. Mitigation measures shall include, but may not limited to, documentation of the historical resource in the form of a Historic American Building Survey-like (HABS) report. The report shall be prepared by a qualified professional meeting the Secretary of the Interior's Professional Qualifications and shall comply with the Secretary of the Interior's Standards for Architectural and Engineering Documentation and shall generally follow the HABS Level III requirements, including digital photographic recordation, detailed historic narrative report, and compilation of historical research. The completed HABS-like documentation shall be completed by the owner and shall be submitted to the City of Burbank Department of Community Development prior to issuance of any permits for demolition or alteration of the historical resource.

Significance After Mitigation

The City's regulations and programs would help mitigate impacts to designated and eligible historical resources by requiring, in certain cases, adherence to the Standards and other requirements intended to preserve the character-defining features of individual historical resources and historic districts that qualify them as historical resources pursuant to CEQA. However, the City's regulations do not, in all cases, prevent demolition or substantial alteration of designated and eligible historical resources. Therefore, potential impacts to historical resources under the proposed Project are significant and unavoidable. Mitigation Measure CUL-1 would reduce impacts to historical resources to the greatest extent feasible by identifying and evaluating significant historical resources and managing relocation, rehabilitation, or alteration in compliance with the Standards as applicable. However, even with implementation of this mitigation measure, historical resources could still be materially impaired by future development projects carried out under the proposed Project. While Historic American Building Survey-like documentation would reduce these impacts to the greatest extent feasible in cases where compliance with the Standards or avoidance is not possible, legal precedent has established that such a measure cannot mitigate impacts to a level of less than significant because the loss of historical fabric cannot be readily compensated for by commemorative mitigation.[2] Therefore, impacts would be significant and unavoidable. Because Mitigation Measure CUL-1 would be site-specific, it is not anticipated that any secondary impacts would occur.

Determination

Significant and unavoidable impact

[2] League for Protection of Oakland's etc. Historic Resources v. City of Oakland (1997) 52 Cal.App.4th 896.

Threshold 2:	Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

Impact CUL-2 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT UPDATE COULD ADVERSELY AFFECT IDENTIFIED AND PREVIOUSLY UNIDENTIFIED PREHISTORIC AND HISTORICAL ARCHAEOLOGICAL RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH THE IMPLEMENTATION OF MITIGATION, AS WELL AS THE POLICIES OUTLINED IN THE CITY OF BURBANK'S HISTORIC RESOURCE MANAGEMENT ORDINANCE PROGRAM LU-4: HISTORIC PRESERVATION PLAN OF THE BURBANK 2035 GENERAL PLAN.

Effects on archaeological resources can only be determined once a specific project has been proposed because the effects are highly dependent on both the individual project site conditions and the characteristics of the proposed ground-disturbing activity. Ground-disturbing activities associated with future development projects facilitated by the proposed Project have the potential to damage or destroy unknown archaeological resources that may be present on or below the ground surface, particularly in areas that have not been studied in a cultural resources investigation or when excavation depths exceed those attained previously for past development. Although the City does not maintain a list of eligible archaeological resources, it is known that prehistoric populations were present in Burbank and the surrounding areas. Therefore, the potential to encounter unknown resources in the Specific Plan Area is moderate. Undeveloped properties in the Specific Plan Area have a higher probability of containing unknown archaeological resources given the probable lack of previous ground-disturbing activities on those properties. However, ground disturbance into undisturbed soils on any property within the Specific Plan Area could contain unknown prehistoric or historic-period archaeological resources. Compliance with the City's Historic Preservation Regulations requiring assessment by a qualified archaeologist, as described in Program LU-4 in the Regulatory Setting, would reduce potential impacts to archaeological resources resulting from future development projects facilitated by the proposed Project.

As also described in Program LU-4, all future development projects facilitated by the proposed Project that require ground-disturbing activities on previously undisturbed lands must be assessed by a qualified archaeologist before construction commences. However, given that unknown archaeological resources can also be present in previously disturbed contexts, impacts would be considered significant, and additional mitigation would be necessary to reduce potential impacts to archaeological resources.

Mitigation Measures

Development projects that require ground disturbance (grading, trenching, foundation work, and other excavations) in native soils, would be required to comply with the City of Burbank Historic Resource Management Ordinance, Program LU-4: Historic Preservation Plan, and General Plan Policies. In addition, the following mitigation measures shall apply:

CUL-2a Archaeological Resources Assessment

For any future development project facilitated by the Burbank Media District Specific Plan that is subject to the California Environmental Quality Act (CEQA), a Phase I Archaeological Resources Study (Phase I) shall be prepared if the future development project will involve ground disturbance, unless the project site has previously been subject to a Phase I within the past 10 years or is within soils that can be reliably demonstrated as being non-native or artificial fill. The study shall be performed by a qualified professional meeting the Secretary of the Interior's (SOI) Professional Qualification Standards for archaeology (National Park Service 1983) at the owner's expense. Methods shall include

a pedestrian survey of the project site and sufficient background research and field sampling to determine whether archaeological resources may be present. Archival research shall include a records search of the South Central Coastal Information Center (SCCIC) no more than two years old and a Sacred Lands File search with the Native American Heritage Commission. The Phase I technical report documenting the study shall include recommendations that must be implemented prior to and/or during construction to avoid or reduce impacts on archaeological resources. Depending on the archaeological sensitivity of the project site, such recommendations shall include cultural resources sensitivity training provided to construction workers prior to construction and/or the implementation of archaeological and Native American monitoring during project related ground disturbance. The Phase I report shall be submitted to the City of Burbank Community Development Department, Building and Safety Division for review and approval prior to the issuance of any grading or construction permits. Recommendations in the Phase I report shall be made Conditions of Approval and shall be implemented throughout all ground disturbance activities.

If the Phase I report identifies cultural resources that may be impacted by the future development project under the proposed Project, an Extended Phase I testing and/or Phase II testing and evaluation shall be conducted at the owner's expense and submitted to the City of Burbank Community Development Department, Building and Safety Division for review and approval prior to the issuance of any grading or construction permits. If resources are determined significant or unique through Phase II testing, impacts shall be reduced to less-than-significant levels by site avoidance or capping. If site avoidance is not possible, appropriate site-specific mitigation measures shall be identified. These measures shall include, but not be limited to, a Phase III data recovery program, mapping the location of artifacts, surface collection of artifacts, or excavation of the cultural deposit to characterize the nature of the buried portions of sites. Curation of the excavated artifacts or samples shall occur as specified by the archaeologist. The Phase III evaluation shall be submitted to the City of Burbank Community Development Department, Building and Safety Division for review and approval prior to the issuance of any grading or construction permits.

If a future development project under the proposed Project would solely involve the refurbishment of an existing building and no ground disturbance would occur, this measure would not be required.

CUL-2b Unanticipated Discovery of Cultural Resources

If cultural resources are discovered during activities related to construction of any future development project under the proposed Project, all work in the immediate vicinity of the find (within a 50-foot buffer at minimum dependent on the discovery type) shall cease and a qualified archaeologist meeting SOI standards retained by the applicant of the future development project shall assess the find. Work on portions of the future development project outside of the buffered area may continue during this assessment period. Should the find involve a resource of Native American origin, the applicant of the future development project shall retain a Native American monitor from one or more of the consulting tribes on the NAHC list with ancestral ties to the Project Area to participate in the evaluation of the resource as defined by CEQA) (as amended, 2015) and to observe all remaining ground-disturbing activities, including, but not limited to, clearing, grading, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, leveling, driving posts, auguring, blasting, stripping topsoil or similar activity, and archaeological work. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for California Register for Historical Resources (CRHR)/National Register for Historic Places (NRHP) eligibility shall be completed.

If the resource proves to be eligible for the CRHR/NRHP and significant impacts to the resource cannot be avoided via development redesign, a qualified archaeologist shall prepare a data recovery plan tailored to the physical nature and characteristics of the resource, per the requirements of the CEQA Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and/or Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource's significance. The City shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System at the SCCIC at California State University at Fullerton pursuant to CEQA Guidelines Section 15126.4(b)(3)(C).

CUL-2c Disposition and Treatment of Inadvertent Discoveries

The Burbank Community Development Department and/or applicant shall, in good faith, consult with the consulting tribe(s) on the disposition and treatment of any tribal cultural resource encountered during all ground disturbing activities.

Significance After Mitigation

Mitigation Measures CUL-2a through CUL-2c would reduce impacts to archaeological resources to a less-than-significant level by minimizing the potential for disruptions to archeological resources to the extent feasible, or by identifying, evaluating, and conducting data recovery of archaeological resources that may be impacted by future projects in a timely manner.

Furthermore, implementation of Mitigation Measures CUL-2a through CUL-2c would be site-specific and would only apply to resources found on a project site, it is not anticipated that any secondary environmental impacts associated with these measures would occur.

Determination

Less than significant with mitigation incorporated

Threshold:	Would the project disturb any human remains, including those interred outside of formal cemeteries?

Impact CUL-3 GROUND-DISTURBING ACTIVITIES ASSOCIATED WITH DEVELOPMENT UNDER THE PROPOSED PROJECT COULD RESULT IN DAMAGE TO OR DESTRUCTION OF HUMAN REMAINS. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH THE IMPLEMENTATION OF MITIGATION, AS WELL AS THE POLICIES OUTLINED IN THE BURBANK PRESERVATION REGULATIONS AND PROGRAM LU-4: HISTORIC PRESERVATION PLAN OF THE BURBANK2035 GENERAL PLAN.

Human burials outside of formal cemeteries can occur in prehistoric and historic-period archaeological contexts. While no known burial sites have been identified in the City, excavations during construction activities could have the potential to disturb these resources, which could include Native American burial sites. Although it is unlikely that human remains are present, properties within the Specific Plan Area have the possibility of containing unknown human remains.

Human remains that are identified as Native American, in addition to being potential archaeological resources, have specific provisions for treatment in Section 5097.98 of the California PRC. The

California Health and Safety Code (Section7050.5, 7051, and 7054) has specific provisions for the protection of human burial remains. Existing regulations address the illegality of interfering with human burial remains, and protect them from disturbance, vandalism, or destruction. They also include established procedures to be implemented if Native American skeletal remains are discovered. PRC Section 5097.98 also addresses the disposition of Native American burials, protects such remains, and established the NAHC to resolve any related disputes.

The policies outlined in Program LU-4 (see Impact CUL-2b) require implementation of a treatment plan outlining measures for monitoring, data recovery, and/or handling inadvertent discoveries to mitigate any potential unanticipated discovery of human remains within the Specific Plan Area. Additionally, all development projects are subject to State of California Health and Safety Code Section 7050.5 that states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The County Coroner must be notified of the find immediately. If the human remains are determined to be prehistoric, the County Coroner will notify the NAHC, which will determine and notify a Most Likely Descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend preservation in place, nondestructive removal and analysis, or other culturally appropriate treatment protocols following discovery of human remains and items associated with Native American human remains. Compliance with existing regulations would reduce potential impacts to human remains to less than significant levels by ensuring proper identification and treatment of any human remains that may be present.

Determination

Less than significant impact

4.4.4 Cumulative Impacts

The geographic extent of cumulative analysis for cultural resources is the City of Burbank, in particular the areas where development would occur under the Downtown Burbank Transit Oriented Development (TOD) Specific Plan (a consolidation and update of the North San Fernando Boulevard Master Plan and the Burbank Center Plan) and the Golden State Specific Plan (GSSP) as described in Section 3, *Environmental Setting*. As described in Section 3, *Environmental Setting,* the Downtown TOD Specific Plan would facilitate development of up to 9,944 residential units and 6,083,657 square feet of commercial and business development land uses; and the GSSP would facilitate development of up to 7,205 residential units and 3,149,623 square feet of commercial and business development land uses. Cumulative impacts may occur if impacts of the proposed Project combine with similar impacts of other projects in the cumulative scenario.

Historical Resources

Future development projects under the proposed Project, the Downtown Burbank TOD Specific Plan, and the GSSP could cause the alteration, removal, or demolition of built-environment historical resources. The nature and magnitude of such impacts would depend on the nature and location of individual future developments under the aforementioned Specific Plans so it would be speculative to try to predict the specific level of cumulative impact that may occur as the City continues to develop. Nevertheless, it is conservatively projected that Citywide development could result in the alteration or loss of some historical resources, with potentially significant cumulative impacts.

All future development projects under the aforementioned Specific Plans would continue to be subject to existing federal, State, and local requirements and discretionary projects may be subject to

project-specific mitigation requirements as outlined under Impact CUL-1. It is anticipated that cumulative impacts to historical resources can be avoided or minimized through implementation of Mitigation Measure CUL-1, and adherence to existing City regulations, and General Plan Program LU-4 on a project-by-project basis, but alteration or demolition of historical resources remains a possibility citywide. Therefore, the incremental effect of the proposed Project related to historical resources would be cumulatively considerable and cumulative impacts would be significant and unavoidable.

Archaeological Resources

Future development projects under the proposed Project, the Downtown Burbank TOD Specific Plan, the GSSP, and the Burbank Rancho Neighborhood Specific Plan could potentially disturb known and currently unknown archaeological resources that could be present throughout the City. The nature and magnitude of such impacts would depend on the nature and location of individual future developments so it would be speculative to try to predict the specific level of cumulative impact that may occur as the City continues to develop. Nevertheless, it is anticipated that Citywide development would have the potential to disturb archaeological resources. Potentially significant cumulative archaeological resource impacts could, however, be mitigated to below a level of significance through resource avoidance or recovery on a case-by-case basis.

Cumulative development under the proposed Project, the Downtown Burbank TOD Specific Plan, and the GSSP could potentially disturb areas that may contain archaeological resources. While there is the potential for significant cumulative impacts to archaeological resources, it is anticipated that potential impacts associated with cumulative development would be addressed on a case-by-case basis and would be subject to City policies and local and State regulations regarding the protection of such resources. It is anticipated that cumulative impacts to historical resources can be avoided or minimized through implementation of Mitigation Measure CUL-2a through CUL-2c, and adherence to existing City regulations, and General Plan Program LU-4 on a project-by-project basis. Therefore, the incremental effect of the proposed Project related to archaeological resources would not be cumulatively considerable and cumulative impacts would be less than significant.

Human Remains

Future development projects under the proposed Project, the Downtown Burbank TOD Specific Plan, and the GSSP could potentially disturb known and currently unknown human remains outside of a formal cemetery that could be present throughout the City. The nature and magnitude of such impacts would depend on the nature and location of individual future developments so it would be speculative to try to predict the specific level of cumulative impact that may occur as the City continues to develop. Nevertheless, it is anticipated that Citywide development would have the potential to disturb unknown human remains. Potentially significant cumulative human remains impacts could, however, be reduced to a less-than-significant level with the standard conditions of approval (including City policies and local and State regulations) described above. Therefore, the incremental effect of the proposed Project related to human remains would not be cumulatively considerable and cumulative impacts would be less than significant.

4.5 Energy

This section evaluates the potential environmental impacts related to energy associated with the implementation of the proposed Project. Specifically, this section reviews the proposed Project's impact related to wasteful and inefficient energy consumption and State and local plans for energy efficiency. The physical environmental impacts associated with the generation of electricity and burning of fuels have been accounted for in Section 4.2, *Air Quality*, Section 4.7, *Greenhouse Gas Emissions,* Section 4.15*, Transportation*, and Section 4.17, *Utilities and Service Systems*.

4.5.1 Environmental Setting

Energy consumption is directly related to environmental quality in that the consumption of nonrenewable energy resources releases criteria air pollutant and greenhouse gas (GHG) emissions into the atmosphere, which can have impacts related to biological resources and human health. The environmental impacts of air pollutant and GHG emissions associated with the proposed Project's energy consumption are discussed in detail in Chapter 4.2, *Air Quality*, and Chapter 4.7, *Greenhouse Gas Emissions*, respectively. The environmental impacts associated with the City's energy capacity and infrastructure are discussed in detail in Section 4.17, Utilities and Service Systems.

Energy is generally consumed either in the form of electricity, measured in kilowatts (kW) or megawatts (MW); natural gas, measured in British thermal units (Btu), therms, or cubic feet; and petroleum fuels, such as gasoline or diesel, measured in gallons or liters. Electricity is used primarily for lighting, appliances, and other uses associated with building and vehicle operations. Electricity sources range from renewable (e.g., hydroelectric, solar, wind, geothermal, biomass) to nonrenewable (e.g., natural gas, oil, nuclear, coal). Natural gas is used primarily for space and water heating and cooking purposes, typically associated with building operations, and is becoming a more common alternative fuel for public transit systems. Fossil fuels are burned to create electricity and petroleum fuels are used primarily for powering off-road equipment and vehicles (commercial trucks and other vehicles).

Transportation energy use relates to the fuel efficiency of the mode of transportation (e.g., passenger vehicles, trucks, trains, airplanes, ships), the availability and use of public transportation, and the miles traveled by these modes. Construction and routine operation and maintenance of residential and non-residential buildings also consume energy, typically in the form of natural gas, diesel, and electricity.

a. Energy Supply

The Burbank Media District Specific Plan Area (hereafter referred to as "Specific Plan Area") would be powered by electricity supplied by Burbank Water and Power (BWP) and natural gas supplied by Southern California Gas Company (SoCalGas). BWP power plants generate approximately 40 to 50 percent of their electricity from natural gas obtained from SoCalGas. The remaining 50 to 60 percent is imported from remote facilities that use a mix of coal, nuclear, hydroelectric, and wind-based resources. Imported electricity is distributed into the City by the Los Angeles Department of Water and Power (LADWP) and City of Burbank power systems. BWP currently operates 11 turbines with a 550-kilowatt potential using landfill gas. Based on City of Burbank and BWP Electricity and Gas Demand Forecast, BWP's total energy to serve load for 2035 is 1,446 GWh.

b. Energy Consumption and Sources

Total energy consumption in the United States in 2023 was approximately 94,000 trillion Btu. Fossil fuel energy production contributed approximately 84 percent of the total energy, and renewable energy and nuclear power each contributed approximately eight percent (Energy Information Administration [EIA] 2025b). On a per capita basis in 2023, California was ranked the fourth lowest state in terms of total energy consumption (EIA 2025c).

Electricity

Most of the electricity generated in California is from natural gas-fired power plants, which provided approximately 37 percent of total electricity generated in 2023 (California Energy Commission [CEC] 2025a). In 2023, California produced 215,623 gigawatt hours (GWh) of the electricity, and imported 65,518 GWh from outside the state (approximately 23 percent). In 2022, California used 287,220 GWh of electricity, with 203,257 GWh produced in-state (CEC 2025a). Based on the most recently available data, Los Angeles County consumed approximately 68,485 GWh of electricity in 2022 from residential and non-residential uses (CEC 2025b). Table 4.5-1 illustrates the County's 2022 electricity consumption in comparison to Statewide consumption and displays the County's equivalent per capita energy consumption from its electricity demand. With a population of 9,834,503 in 2022 (Department of Finance [DOF] 2024), the County's 2022 per capita electricity consumption was approximately 6,964 kWh, or approximately 24 million Btu.[1] BWP's electricity consumption during this time period was 1,079 GWh (BWP 2023).

Table 4.5-1 2022 Annual Electricity Consumption

Jurisdiction	Electricity Use (GWh)	Proportion of Statewide Consumption	Consumption per Capita (kWh)	Consumption per Capita (MMBtu)
Los Angeles County	68,485	23.8%	6,964	23.76
California	287,826	N/A	7,365	25.13

GWh = gigawatt-hours; kWh = MMBtu = Million British Thermal Unit

Notes: For reference, the population of Los Angeles County (9,834,503 persons) is approximately 25.3 percent of the population of California (39,078,674 persons) (DOF 2023).

Source: CEC 2025c

Natural Gas

California relies on out-of-state natural gas imports for nearly 90 percent of its natural gas supply (CEC 2023d). Los Angeles County as a whole consumed approximately 2.82 billion therms of natural gas in 2022 in both residential and non-residential uses (CEC 2025e). Table 4.5-2 illustrates the County's 2022 natural gas consumption in comparison to Statewide consumption and displays the County's equivalent per capita energy consumption from its natural gas demand. Los Angeles County's 2022 per capita natural gas consumption was approximately 287 therms, or approximately 27 million Btu.[2]

[1] Note 2022 is the most recently available year of data.
[2] Note 2022 is the most recently available year of data.

Table 4.5-2 2022 Annual Natural Gas Consumption

Jurisdiction	Natural Gas Consumption (billions of U.S. therms)	Proportion of Statewide Consumption	Consumption per Capita (U.S. therms)	County per Capita Consumption (MMBtu)
Los Angeles County	2.82	24.1%	287	26.7
California	11.71	N/A	300	29.9

MMBtu = Million British Thermal Unit

Notes: For reference, the population of Los Angeles County (9,834,503 persons) is approximately 25.3 percent of the population of California (39,078,674 persons) (DOF 2023)

Source: CEC 2025e

The City of Burbank (hereafter referred to as "City" or "Burbank") is in the natural gas service area of SoCalGas, which encompasses approximately 24,000 square miles in diverse terrain throughout Central and Southern California, from Visalia to the Mexican border (SoCalGas 2024). In 2022, SoCalGas customers consumed a total of 5 billion therms of natural gas. Residential users accounted for approximately 44 percent of SoCalGas's natural gas consumption. Industrial and commercial users accounted for another 32 percent and 19 percent, respectively. The remainder was used for mining, construction, agricultural, and water pump accounts (CEC 2025f). In 2022, Los Angeles County users accounted for approximately 56 percent of SoCalGas' total natural gas consumption across the entire service area.

The 2024 California Gas Report presents a comprehensive outlook for natural gas requirements and supplies for California through the year 2040. The report is prepared in even-numbered years, followed by a supplemental report in odd-numbered years, in compliance with CPUC Decision D.95-01-039. The projections contained in the California Gas Report are for long-term planning and do not necessarily reflect the day-to-day operational plans of the utilities (California Gas and Electric Utilities [CGEU] 2022). California natural gas demand, statewide and utility-driven, is expected to decrease at a rate of two percent per year through 2040 under the "Average Demand" case. The projected decline comes from less gas demand in the major market segment areas of residential, electric generation, commercial and industrial markets. The segment where growth in demand is expected is the natural gas vehicle sector. Stricter codes and standards coupled with more aggressive energy efficiency programs discussed in Section 4.5.2, *Regulatory Framework,* are making a significant impact on the forecasted load for the residential, commercial, and industrial markets (CGEU 2024).

Petroleum

Petroleum fuels are generally purchased by individual users, such as residents and employees. There are no petroleum refineries in the Specific Plan Area (CEC 2023f), but there are approximately 2,115 gasoline stations in Los Angeles County.

Energy consumed by the transportation sector accounts for roughly 45 percent of California's energy demand, amounting to approximately 3,036 trillion Btu in 2023. Petroleum-based fuels are used for approximately 85 percent of the State's transportation activity (EIA 2025c). Most gasoline and diesel fuel sold in California for motor vehicles is refined in California to meet State-specific formulations required by the California Air Resources Board (CARB). California's total combined petroleum consumption accounted for approximately 648 million barrels of petroleum fuels in 2023 (EIA 2025c).

As shown in Table 4.5-3, Los Angeles County consumed an estimated 3,039 million gallons of gasoline and 290 million gallons of diesel fuel in 2023 (CEC 2023c). The County's annual per capita fuel consumption in 2023 consisted of 309 gallons of gasoline and 31 gallons of diesel fuel per person.

According to the CEC, one gallon of gasoline is equivalent to approximately 109,786 Btu, while one gallon of diesel is equivalent to approximately 127,460 Btu (Schremp 2017). As shown in Table 4.5-3, each person in Los Angeles County consumed approximately 34 million Btu in transportation fuel in 2023.

Table 4.5-3 2023 Annual Gasoline and Diesel Consumption

Fuel Type	Los Angeles County (million gallons)	California (million gallons)	Proportion of Statewide Consumption	County per Capita Consumption (gallons)	County per Capita Consumption (MMBtu)
Gasoline	3,039	13,576	22.4%	309	34
Diesel	290	2316	12.5%	31	3

Notes: The population of Los Angeles County is 9,834,503 persons (DOF 2023)

Source: CEC 2025g

Alternative Fuels for Motor Vehicles

A variety of alternative fuels are used to reduce petroleum-based fuel demand. The use of these fuels is encouraged through various Statewide regulations and plans (e.g., Low Carbon Fuel Standard and Health and Safety Code Section 38566 [Senate Bill (SB) 32]). Conventional gasoline and diesel may be replaced, depending on the capability of the vehicle, with alternative fuels, including those described below.

Hydrogen is being explored for use in combustion engines and fuel cell electric vehicles. The interest in hydrogen as an alternative transportation fuel stems from its clean-burning qualities, its potential for domestic production, and the fuel cell vehicle's potential for high efficiency (two to three times more efficient than gasoline vehicles). Currently, there are 45 open hydrogen refueling stations in California; none are in the Specific Plan Area, but one is approximately a quarter-mile north of the Warner Brothers Ranch opportunity site at 800 North Hollywood Way in Burbank, and one is approximately one mile southwest of the Specific Plan Area at 3780 Cahuenga Boulevard in Studio City (CEC 2026).

Biodiesel is a renewable alternative fuel that can be manufactured from vegetable oils, animal fats, or recycled restaurant greases. Biodiesel is biodegradable and cleaner-burning than petroleum-based diesel fuel. Biodiesel can run in any diesel engine generally without alterations, but fueling stations have been slow to make it available. There are 38 biodiesel refueling stations in California. The nearest biodiesel refueling station is approximately two miles northeast of the Specific Plan Area at 100 S Glenoaks Boulevard in Burbank (U.S. Department of Energy [DOE] 2025a).

Electricity can be used to power electric and plug-in hybrid electric vehicles directly from the power grid. The electricity grid usually provides electricity used to power vehicles, which store it in the vehicle's batteries. Fuel cells are being explored to use electricity generated on board the vehicle to power electric motors. There are 16 electrical charging stations available in the Specific Plan Area, which are located within the Warner Studio Lot, the NBC Studio Lot, the Pinnacle mixed-use plaza, and within the Lakeside Shopping Center (DOE 2025b).

Energy and Fuel Efficiency

The demand for gasoline and diesel fuel is tied to population growth and the availability of mass transit. Fuel demand can be offset partially by efficiency improvements, land use policies that encourage infill and growth near transit centers (e.g., following SB 375, the Sustainable Communities

and Climate Protection Act of 2008), improvements to fuel efficiency, and gradual replacement of vehicles with new, more fuel-efficient cars, all of which will reduce fuel use. In the future, increasing gasoline prices may apply downward pressure to gasoline demand in the State.

4.5.2 Regulatory Setting

a. Federal Regulations

Energy Policy and Conservation Act

Enacted in 1975, the Energy Policy and Conservation Act established fuel economy standards for new light-duty vehicles sold in the United States. The law placed responsibility on the National Highway Traffic Safety Administration (NHTSA), a part of the United States Department of Transportation, for establishing and regularly updating vehicle standards. The United States Environmental Protection Agency (USEPA) administers the Corporate Average Fuel Economy (CAFE) program, which determines vehicle manufacturers' compliance with existing fuel economy standards.

National Energy Policy Act of 1992

The National Energy Policy Act of 1992 (EPACT92) calls for programs that promote efficiency and the use of alternative fuels. EPACT92 requires certain federal, state, and local governments and private operators to stock vehicle fleets with a percentage of light duty alternative fuel vehicles each year. In addition, EPACT92 has financial incentives: federal tax deductions will be allowed for businesses and individuals to cover the incremental cost of alternative fuel vehicles. EPACT92 also requires states to consider a variety of incentive programs to help promote alternative fuel vehicles.

Energy Policy Act of 2005

The Energy Policy Act of 2005 provides renewed and expanded tax credits for electricity generated by qualified energy sources, such as landfill gas; provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification; and establishes a federal purchase requirement for renewable energy.

Energy Independence and Security Act of 2007

The Energy Independence and Security Act, enacted by Congress in 2007, is designed to improve vehicle fuel economy and help reduce the United States' dependence on foreign oil. It expands the production of renewable fuels, reducing dependence on oil and confronting climate change. Specifically, it does the following:

- Increases the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard that requires fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Reduces United States' demand for oil by setting a national fuel economy standard of 35 miles per gallon by 2020, an increase in fuel economy standards of 40 percent as compared to 2007 levels.

The Energy Independence and Security Act of 2007 also set energy efficiency standards for lighting (specifically light bulbs) and appliances. Development would also be required to install photosensors and energy-efficient lighting fixtures consistent with the requirements of 42 United States Code Section 17001 et seq.

Energy Star Program

Energy Star is a voluntary labeling program introduced by USEPA to identify and promote energy-efficient products to reduce GHG emissions. The program applies to major household appliances, lighting, computers, and building components such as windows, doors, roofs, and heating and cooling systems. Under this program, appliances that meet specifications for maximum energy use established under the program are certified to display the Energy Star label. In 1996, the USEPA joined with the Energy Department to expand the program, which now also includes certifying commercial and industrial buildings as well as homes (Energy Star 2026).

Construction Equipment Fuel Efficiency Standard

USEPA sets emission standards for construction equipment. The first federal standards (Tier 1) were adopted in 1994 for all off-road engines over 50 horsepower and were phased in by 2000. A new standard was adopted in 1998 that introduced Tier 1 for all equipment below 50 horsepower and established the Tier 2 and Tier 3 standards. The Tier 2 and Tier 3 standards were phased in by 2008 for all equipment. The current iteration of emissions standards for construction equipment are the Tier 4 efficiency requirements, which are contained in 40 Code of Federal Regulations Parts 1039, 1065, and 1068. Emissions requirements for new off-road Tier 4 vehicles were completely phased in by the end of 2015.

b. State Regulations

Warren-Alquist Act

The 1974 Warren-Alquist Act established the California Energy Resources Conservation and Development Commission in 1975, now known as the California Energy Commission (CEC). The Act established a State policy to reduce wasteful, uneconomical, and unnecessary uses of energy by employing a range of measures. Under the Act, the CEC is responsible for forecasting future energy needs, promoting energy conservation and efficiency, developing renewable energy resources, and adopting building and appliance efficiency standards, such as Title 20 and Title 24 of the California Code of Regulations (CCR).

California Energy Plan

The CEC is responsible for preparing the California Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The 2008 California Energy Plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies several strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and addressing their infrastructure needs, as well as encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

California Renewable Portfolio Standard and Senate Bill 100

Established in 2002 under SB 1078, and accelerated by SB 107 (2006), SB X 1-2 (2011), and SB 100 (2018), California's Renewable Portfolio Standard (RPS) obligates investor-owned utilities, energy service providers, and community choice aggregators to procure 33 percent total retail sales of

electricity from renewable energy sources by 2020, 60 percent by 2030, and 100 percent by 2045. California Public Utilities Code Section 454.53 states "It is the policy of the state that eligible renewable energy resources and zero-carbon resources supply 90 percent of all retail sales of electricity to California end-use customers by December 31, 2035, 95 percent of all retail sales of electricity to California end-use customers by December 31, 2040, 100 percent of all retail sales of electricity to California end-use customers by December 31, 2045, and 100 percent of electricity procured to serve all state agencies by December 31, 2035." The CPUC and the CEC are jointly responsible for implementing the program.

Senate Bill 350: Clean Energy and Pollution Reduction Act of 2015

The Clean Energy and Pollution Reduction Act of 2015 (SB 350) requires the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources to be increased to 60 percent by December 31, 2030. The act also requires doubled energy efficiency savings in electricity and natural gas for retail customers through increased efficiency and conservation by December 31, 2030.

Assembly Bill 1493: Reduction of Greenhouse Gas Emissions

Assembly Bill 1493 (Chapter 200, Statutes of 2002), known as the Pavley bill, amended Health and Safety Code Sections 42823 and 43018.5, requiring CARB to develop and adopt regulations that achieve maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles, light-duty trucks, and other vehicles used for noncommercial personal transportation in California. Implementation of new regulations prescribed by AB 1493 required that the State apply for a waiver under the federal Clean Air Act. Although the USEPA initially denied the waiver in 2008, the USEPA approved a waiver in June 2009, and in September 2009, CARB approved amendments to its initially adopted regulations to apply the Pavley standards that reduce GHG emissions to new passenger vehicles in model years 2009 through 2016. The Advanced Clean Cars program (Pavley II) was adopted in 2012 and expands on these standards with stricter fuel efficiency and emissions limits for model years 2017 through 2025. In 2022, CARB adopted the Advanced Clean Cars II regulations to include more stringent standards for emissions from light-duty vehicles for model years 2026 and beyond. According to CARB, implementation of the Pavley regulations is expected to reduce fuel consumption while also reducing GHG emissions.

Assembly Bill 1007: State Alternative Fuels Plan

AB 1007 (Chapter 371, Statutes of 2005) required the CEC to prepare a State plan to increase the use of alternative fuels in California. The CEC prepared the State Alternative Fuels (SAF) Plan in partnership with CARB and in consultation with other State, federal, and local agencies. The SAF Plan presents strategies and actions California must take to increase the use of alternative, nonpetroleum fuels in a manner that minimizes costs to California and maximizes the economic benefits of in-state production. The SAF Plan assessed various alternative fuels and developed fuel portfolios to meet California's goals to reduce petroleum consumption, increase alternative fuel use, reduce GHG emissions, and increase in-State production of biofuels without causing a significant degradation of public health and environmental quality.

2022 Scoping Plan

CARB published the Final 2022 Climate Change Scoping Plan in November 2022 (CARB 2022). The 2022 Scoping Plan builds upon the framework established by the 2008 Climate Change Scoping Plan and

previous updates while identifying a new, technologically feasible, cost-effective, and equity-focused path to achieve California's climate target. The 2022 Scoping Plan includes policies to achieve a significant reduction in fossil fuel combustion, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands to reduce emissions and sequester carbon, and the capture and storage of carbon. The 2022 Scoping Plan would reduce demand for liquid petroleum by 94 percent and total fossil fuel by 86 percent in 2045 compared to 2022.

Title 24, California Code of Regulations

The California Code of Regulations (CCR) Title 24 is referred to as the California Building Standards Code. It consists of a compilation of several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility for persons with physical and sensory disabilities. The CEC adopted the 2022 Standards on August 11, 2021, which went into effect on January 1, 2023. The 2025 Standards were most recently adopted on July 1, 2025, and will be in effect on January 1, 2026. The California Building Standards Code's energy-efficiency and green building standards are outlined below.

Part 6 (Building Energy Efficiency Standards)

CCR Title 24, Part 6 is the Building Energy Efficiency Standards or California Energy Code. This code, originally enacted in 1978, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. New construction and major renovations must demonstrate their compliance with the current Energy Code through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC. The 2022 Title 24 standards are the applicable building energy efficiency standards for the proposed Project because they became effective on January 1, 2023.

Part 11 (California Green Building Standards Code)

The California Green Building Standards Code, referred to as the CALGreen Code, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 California Building Standards Code). The 2022 CALGreen Code includes mandatory minimum environmental performance standards for all ground-up new construction of residential and non-residential structures. It also includes voluntary tiers with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory CALGreen Code standards and may adopt additional amendments for stricter requirements.

The mandatory standards require, among other standards:

- Inspections of energy systems to ensure optimal working efficiency
- Electric Vehicle (EV) Charging for New Construction[3]
    - One- and two-family dwellings and town houses with attached private garages: Dedicated circuitry to facilitate installation of electric vehicle (EV) charging;

[3] EV Capable = a vehicle space with electrical panel space and load capacity to support a branch circuit and necessary raceways to support EV charging; EV-ready = a vehicle space which is provided with a branch circuit and any necessary raceways to accommodate EV charging stations, including a receptacle for future installation of a charger (see 2022 CALGreen Code, Title 24 Part 11 for full explanation of mandatory measures, including exceptions).

- Multi-family dwellings and hotels/motels with less than 20 units/rooms: Designation of at least 10 percent of the total number of parking spaces shall be EV capable and at least 25 percent of the total number of parking spaces shall be EV-ready;
- Multi-family dwellings and hotels/motels with greater than 20 units/rooms: Designation of at least 10 percent of the total number of parking spaces shall be EV capable, at least 25 percent of the total number of parking spaces shall be EV-ready, and at least 5 percent of the total number of parking spaces shall be equipped with a Level 2 charging station;
- Non-residential land uses shall comply with the following EV charging requirements based on the number of passenger vehicle parking spaces:
  - 0-9: No EV capable spaces or charging stations required
  - 10-25: 4 EV capable spaces but no charging stations required
  - 26-50: 8 EV capable spaces of which 2 must be equipped with charging stations
  - 51-75: 13 EV capable spaces of which 3 must be equipped with charging stations
  - 76-100: 17 EV capable spaces of which 4 must be equipped with charging stations
  - 101-150: 25 EV capable spaces of which 6 must be equipped with charging stations
  - 151-200: 35 EV capable spaces of which 9 must be equipped with charging stations
  - More than 200: 20 percent of the total available parking spaces of which 25 percent must be equipped with charging stations
- Non-residential land uses shall comply with the following EV charging requirements for medium- and heavy-duty vehicles: warehouses, grocery stores, and retail stores with planned off-street loading spaces shall install EV supply and distribution equipment, spare raceway(s) or busway(s) and adequate capacity for transformer(s), service panel(s), or subpanel(s) at the time of construction based on the number of off-street loading spaces as indicated in Table 5.106.5.5.1 of the CALGreen Code

- Bicycle Parking
  - Non-residential short-term bicycle parking for projects anticipated to generate visitor traffic: permanently anchored bicycle racks within 200 feet of visitor entrance for 5 percent of new visitor motorized vehicle parking spaces with a minimum of one 2-bike capacity rack; and/or
  - Non-residential buildings with tenant spaces of 10 or more employees/tenant-occupants: secure bicycle parking for 5 percent of the employee/tenant-occupant vehicle parking spaces with a minimum of one bicycle parking facility

The voluntary standards require the following:

- Residential – Cool Roofs: have a thermal mass over the roof membrane, including green roofs weighing a minimum of 25 pounds per square foot or roof areas covered by solar photovoltaic panels and building integrated solar thermal panels;
- Residential: Reduce nonroof heat island for 50 percent of sidewalks, patios, driveways or other paved areas;
- One- and two-family dwelling units and townhouses with attached garages: install a dedicated 208/240-volt branch circuit for EV charging;

- Residential Bicycle Parking
  - Multi-family/hotel/motel short-term parking: provide permanently anchored bicycle racks within 100 feet of visitor's entrance for 5 percent of visitor motorized vehicle parking capacity (minimum one 2-bike capacity rack);
  - Multi-family buildings long-term parking: provide acceptable on-site bicycle parking for at least one bicycle per every two dwelling units; and/or
  - Hotel/motel long-term parking: provide one acceptable on-site bicycle parking space for every 25,000 square feet but not less than two spaces.
- Tier I
  - Stricter energy efficiency requirements
  - Multi-family developments/hotels/motels: minimum 35 percent of total parking spaces shall be EV ready and for projects with 20 or more dwelling units/rooms a minimum of 10 percent of the total number of parking spaces shall be equipped with EV charging stations.
- Tier II
  - Stricter energy efficiency requirements
  - Multi-family developments/hotels/motels: minimum 40 percent of total parking spaces shall be EV ready and for projects with 20 or more dwelling units/rooms, a minimum of 15 percent of the total number of parking spaces shall be equipped with EV charging stations.

c. Local Regulations

The City of Burbank City Council adopted an updated Greenhouse Gas Reduction Plan in 2022 that calls for the City of Burbank to adopt local reach codes that go above and beyond Title 24 to reduce emissions. In addition, all new buildings must comply with CALGreen Code Tier 2 requirements for electric vehicle charging infrastructure.

Burbank2035 General Plan

Burbank2035 includes goals and policies to pursue sustainability and energy conservation. The following Land Use Element and Open Space and Conservation Element goals and policies are applicable to the proposed Project:

Land Use Element Goal 2: Sustainability

Policy 2.1: Consider sustainability when making discretionary land use and transportation decisions, policies, regulations, and projects.

Policy 2.3: Require that new development pay its fair share for infrastructure improvements. Ensure that needed infrastructure and services are available prior to or at project completion.

Policy 2.5: Require the use of sustainable construction practices, building infrastructure, and materials in new construction and substantial remodels of existing buildings.

Policy 2.6: Design new buildings to minimize the consumption of energy, water, and other natural resources. Develop incentives to retrofit existing buildings for a net reduction in energy consumption, water consumption, and stormwater runoff.

Open Space and Conservation Element Goal 10: Energy Resources:

Policy 10.1: Incorporate energy conservation strategies in City projects.

Policy 10.2: Promote energy-efficient design features to reduce fuel consumption for heating and cooling.

Policy 10.4: Encourage residents and businesses to reduce vehicle use or to purchase alternative fuel vehicles.

Policy 10.7: Encourage the use of solar energy systems in homes and commercial businesses as a form of renewable energy.

City of Burbank Greenhouse Gas Reduction Plan Update

The City of Burbank adopted the Greenhouse Gas Reduction Plan Update (GGRP Update) in 2022. Per the GGRP Update, Burbank is committed to an emissions reduction target of 49 percent below 1990 levels by 2030 (SB 32 target year) and reaching a longer-term goal of carbon neutrality by 2045. This target and goal are consistent with statewide efforts established in the Scoping Plan to reduce statewide GHG emissions to 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050. The following actions are applicable to the Specific Plan:

Strategy T-3 Zero-Emission Vehicles

Action T-3.1.a: Adopt an EV Charging Retrofits in Existing Commercial and Multifamily Buildings Reach Code requiring major retrofits, with either a building permit with square footage larger than 10,000 square feet or including modification of electric service panels, to meet CALGreen requirements for "EV Ready" charging spaces and infrastructure.

Action T-3.1.h: Adopt an EV Reach Code requiring new commercial and multifamily construction to install the minimum number of EV chargers based on Tier 2 CALGreen requirements (20% of total).

4.5.3 Impact Analysis

a. Thresholds of Significance

For the purposes of this environmental analysis, thresholds of significance are based on the questions in Appendix G of the *CEQA Guidelines,* which states that impacts related to energy would be potentially significant if implementation of the proposed Project would do any of the following:

1. Result in wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
2. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Thresholds 1 and 2 are analyzed below.

The guidance for energy analysis under Appendix F of the *CEQA Guidelines* is also addressed in the following Methodology discussion, as well as in Section 4.17, *Utilities and Service Systems*, Section 5, *Other CEQA Considerations,* and Section 6, *Alternatives* of this EIR.

b. Methodology

CEQA Guidelines – Appendix G

Public Resources Code Section 21100(b)(3) states that an EIR shall include "mitigation measures proposed to minimize significant effects on the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy."

Energy consumption is categorized herein in terms of "direct" and "indirect" energy. Direct energy accounts for energy consumed during operation of the transportation system and land use scenario envisioned under the proposed Project, such as fuel consumed by vehicles, natural gas consumed for heating and/or power, and electricity consumed for power. Indirect energy is the energy needed for construction and maintenance of the transportation system and land use scenario envisioned under the proposed Project. The analysis of direct energy involves the quantification of anticipated transportation fuel, natural gas, and electricity consumption of development carried out under the proposed Project and a qualitative discussion of the efficiency, necessity, and wastefulness of energy consumption. Analysis of indirect energy involves a qualitative discussion of construction and maintenance energy requirements of development carried out under the proposed Project.

Development carried out under the proposed Project would generate direct energy consumption from the use of transportation fuel by the anticipated growth of residential and commercial land uses under the proposed Project. Currently, there is not sufficient detail regarding new development anticipated under the proposed Project; therefore, growth assumptions for direct energy impacts have been used to estimate energy usage for development expected to be carried out under the proposed Project.

To determine the 2035 natural gas and electricity consumption for development under the proposed Project, consumption factors were drawn from the California Emissions Estimator Model (CalEEMod) Version 2022.1. The CalEEMod data is provided as Appendix C.

CEQA Guidelines – Appendix F

Energy impacts are evaluated in accordance with Section II of Appendix F, *Energy Conservation*, of the *CEQA Guidelines*. As with Appendix G, Appendix F provides guidance for determining whether a project would result in the wasteful, inefficient, or unnecessary consumption of energy resources or would conflict with state or local plans for energy conservation. Section II, *EIR Contents*, includes four subsections, which describe the topics that may be included in the EIR. Section II.A includes items to discuss in the project description, Section II.B includes items for the environmental setting, and Section II.C includes a description of environmental impacts regarding energy use, resources, and demand as well as compliance with energy standards. Section 4.5, *Energy*, analyzes the following potential environmental impacts identified in Appendix F, Section II.C:

- The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal.
- The degree to which the project complies with existing energy standards.
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Section 4.17, *Utilities and Service Systems*, analyzes the following potential environmental impacts identified in Appendix F, Section II.C:

- The effects of the project on local and regional energy supplies and on requirements for additional capacity.
- The effects of the project on peak and base period demands for electricity and other forms of energy.
- The effects of the project on energy resources

Section II.D includes options for the types of mitigation measures that may be included in an analysis. As discussed in the impact analyses below energy-related impacts under the proposed Project would be less than significant, so there are no program-level measures that apply. The capacity analysis is provided in Section 4.17, *Utilities and Service Systems*, which includes a capacity analysis with detailed provided by BWP (Appendix L, BWP 2025).

Sections II.E states alternatives should be compared in terms of overall energy consumptions and reducing inefficient consumption of energy; this analysis is included in Section 6, *Alternatives*, of this EIR. Sections II.F, II.G and II.I include other energy-related impacts including Unavoidable Adverse Effects, Irreversible Commitment of Resources, Growth Inducing Effects, respectively, which are addressed in Section 5, *Other CEQA Considerations*, of this EIR. Section II.H include Short-Term Gains versus Long-Term Impacts, which is an analysis that applies to a project-level analysis and therefore is not analyzed further for the proposed Project.

a. Project Impacts

Threshold 1:	Would the proposed Project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Impact E-1 THE PROPOSED PROJECT WOULD PROMOTE URBAN INFILL AND CREATE DIVERSE AND WALKABLE NEIGHBORHOODS. NEITHER CONSTRUCTION NOR OPERATION OF FUTURE DEVELOPMENT PROJECTS UNDER THE PROPOSED PROJECT WOULD RESULT IN A SIGNIFICANT ENVIRONMENTAL IMPACT DUE TO THE WASTEFUL, INEFFICIENT, OR UNNECESSARY CONSUMPTION OF ENERGY RESOURCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Future development projects carried out under the proposed Project would use nonrenewable and renewable resources for construction and operation, as discussed below.

Construction Energy Demand

Future development projects carried out under the proposed Project is anticipated to require demolition, site preparation and grading, including hauling material off-site; pavement and asphalt installation; building construction; architectural coating; and landscaping and hardscaping. During construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on construction sites, construction worker vehicle travel to and from construction sites, and vehicles used to deliver materials to construction sites.

Energy use during construction would be temporary in nature and construction equipment used would be typical of similar-sized construction projects in the region. In addition, construction contractors would be required to comply with the provisions of the CCR Title 13 Sections 2449 and

2485, which would minimize unnecessary fuel consumption by prohibiting diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes. Furthermore, per applicable regulatory requirements, such as the 2022 CALGreen Code, future development projects under the proposed Project must comply with construction waste management practices to divert a minimum of 65 percent of construction debris. These practices would result in efficient use of energy necessary to construct these future development projects under the proposed Project. In the interest of cost-efficiency, construction contractors also would not utilize fuel in a manner that is wasteful or unnecessary. Overall, construction for development under the proposed Project would be temporary and typical of that associated with development throughout the region. Therefore, reasonably foreseeable development under the proposed Project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the construction-phase impact related to energy consumption would be less than significant.

Operational Energy Demand

Operation of future development projects under the proposed Project would contribute to regional energy demand by consuming electricity, natural gas, and gasoline and diesel fuels. Natural gas and electricity would be used for heating and cooling systems, lighting, and appliances, among other purposes. Gasoline and diesel consumption would be associated with vehicle trips generated by customers and employees.

All new development under the proposed Project would be required to comply with all standards set in the latest iteration of the California Building Standards Code (California Code of Regulations Title 24), which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources by the built environment during operation. California's CALGreen Code standards (California Code of Regulations Title 24, Part 11) require implementation of energy-efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2022 Building Energy Efficiency Standards (California Code of Regulations Title 24, Part 6) require newly constructed buildings to meet energy performance standards set by the CEC. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy.

The proposed Project supports and expands upon the goals, policies, and programs of the City's GGRP Update to achieve the following:

- Require bike parking where off-street parking is required
- Allow and manage shared-use mobility devices
- Require new commercial and multifamily construction to install electric vehicle (EV) charge ports
- Require street trees and greening parking lots for new developments
- Expand urban tree canopy and vegetative barriers

These measures would reduce fuel consumption from vehicle use, promote renewable energy use, and conserve energy by lowering urban temperature and reducing the urban heat island effect. Furthermore, the proposed land use changes would increase housing density and encourage mixed-use development near existing commercial uses and existing transit stops, which would facilitate the use of transit and alternative transportation modes, such as walking and biking. As discussed in Section 4.15, *Transportation*, the City's daily VMT under the proposed Project would be approximately 21.0 VMT per service population, which would be a decrease from the City's 2023 daily VMT of 24.5 VMT per service population. As implementation of the Specific Plan would reduce VMT

per service population, overall fuel consumption per service population associated with transportation would also decrease. Therefore, the proposed Project would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy. Impacts would be less than significant.

Determination

Less than significant

Threshold 2:	Would the proposed Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Impact E-2 FUTURE DEVELOPMENT UNDER THE PROPOSED PROJECT WOULD BE REQUIRED TO COMPLY WITH APPLICABLE STATE AND LOCAL PLANS AND POLICIES FOR RENEWABLE ENERGY AND ENERGY EFFICIENCY. THE PROPOSED PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT A STATE OR LOCAL PLAN FOR RENEWABLE ENERGY OR ENERGY EFFICIENCY, AND THERE WOULD BE A LESS THAN SIGNIFICANT IMPACT.

The 2022 GGRP Update includes strategies, actions, and measures to reduce emissions that would eliminate or reduce to the greatest extent feasible the use of on-site gas would be in alignment with local sustainability goals. GGRP Measure BE-1.1 calls to codify all-electric new construction. In order to meet the goal of carbon neutrality by 2045, direct GHG emissions from natural gas will need to be phased out. Other sample efficiency measures in the GGRP include increasing building energy efficiency through BWP's rebate and incentive programs and conducting outreach to building owners to communicate the benefits of electrification. Development of all-electric buildings was determined to be less expensive to build and operate in Burbank's Climate Zone compared to constructing buildings with both gas and electric utilities, especially when paired with solar photovoltaic and solar thermal installations.

The applicable State plans and policies for renewable energy and energy efficiency include the 2022 Title 24 standards, the 2022 CALGreen Code, Southern California Association of Government's 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (2024-2050 RTP/SCS), the Burbank2035 General Plan and the 2022 GGRP Update.

Development under the Specific Plan is required to comply with all standards set in the latest iteration of the California Building Standards Code (CCR Title 24). California's CALGreen standards (CCR Title 24, Part 11) require implementation of energy-efficient light fixtures and building materials into the design of new construction projects. Furthermore, the Building Energy Efficiency Standards (CCR Title 24, Part 6) require newly constructed buildings to meet energy performance standards set by the CEC. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. In addition, per CALGreen, all plumbing fixtures used for the proposed project would be high-efficiency fixtures, which would minimize the potential for the inefficient or wasteful consumption of energy related to water and wastewater.

These features are consistent with the Burbank2035 Land Use Element Policy 2.6 and Open Space and Conservation Element Policy 10.1 and Policy 10.2 as they pertain to minimizing energy consumption and promote energy efficiency in building construction and design. The proposed Project would also be consistent with the regional policies in the 2024-2050 RTP/SCS, which encourages the use of technology and sustainability policies to reduce overall energy consumption. Additionally, consistent with the Renewable Portfolio Standard (RPS), the proposed Project would utilize electricity provided by BWP that is composed of approximately 34 percent renewable energy as of 2022 and would

achieve at least 60 percent renewable energy by 2030.[4] Given the aforementioned, the proposed Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and impacts would be less than significant.

Determination

Less than significant

4.5.4 Cumulative Impacts

Locally, energy resources are provided by various oil companies, BWP, and SoCalGas, but the issue of energy is global in nature; as such, the State, as well as regional and local governments, have adopted policies aimed at energy conservation. The service areas for energy providers are varied, with BWP primarily serving the Specific Plan Area, SoCal Gas serving a 24,000 square mile region covering much of central and southern California, and oil companies serving customers all over the world. No single geographic scope can address the full extent of issues related to energy resources so the cumulative analysis contained herein considers energy demand that would result from implementation of the proposed Project, the Downtown Transit-Oriented Development (TOD) Specific Plan (a consolidation and update of the North San Fernando Boulevard Master Plan and the Burbank Center Plan), and Golden State Specific Plan (GSSP), as well as the City of Burbank and the southern California region served by SoCal Gas in the context of statewide energy demand and State mandates related to energy conservation.

As discussed above, cumulative development in Burbank and throughout southern California would continue to increase energy use to meet population growth under the proposed Project, the Downtown TOD Specific Plan, the GSSP, and growth throughout the City. However, implementation of future community plans is expected to generally improve the efficiency of energy use in the Specific Plan Area, while adherence to existing state regulations such as CALGreen and the Low Carbon Fuel Standard would ensure the incorporation of energy efficient measures in the design and operation of future developments throughout the region. Thus, cumulative impacts related to energy use arising from cumulative development in Burbank and throughout the region would be less than significant.

As discussed under Impact 4.5-1, implementation of the proposed Project would generally improve the efficiency of energy use in the Specific Plan Area on a per capita basis and would not contribute to a cumulative impact related to the wasteful, unnecessary, or inefficient use of energy. Furthermore, development emphasis on compact land use and growth patterns that facilitate transit and non-motorized transportation are anticipated to result in less energy consumption. As mentioned in Section 4.7, *Greenhouse Gases*, SCAG's 2020-2045 RTP/SCS was developed to provide a blueprint to integrate land use and transportation strategies to help achieve a coordinated and balanced regional transportation system as well as reduce energy use and associated GHG emissions within the region. The proposed Project would accommodate concentrated, mixed-use development adjacent to transit corridors and near major employment centers in order to conserve resources, protect existing residential neighborhoods, and reduce energy use through the increase in active transportation and use of transit. While implementation of the proposed Project would result in increased demand for energy and natural gas, the impact to the City's and region's energy resources would be less than significant. The proposed Project would support energy efficient practices and would not result in wasteful or inefficient use of energy.

[4] The eligible renewable percentage of 34 presented by BWP does not reflect RPS compliance, which is determined by another methodology (BWP 2024).

Based on the above, the incremental effect of the proposed Project on energy resources would not be cumulatively considerable and cumulative impacts would be less than significant.

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4.6 Geology/Soils

This section evaluates the potential environmental impacts related to geology and soils associated with implementation of the proposed Project. Specifically, this section reviews the proposed Project's impact related to ground shaking, liquefaction, soil erosion, unstable soils, expansive soils, and paleontological resources. Other thresholds of significance associated with fault rupture, landslides, and septic tanks are discussed in Section 4.19, *Effects Found Not to be Significant*; therefore, these issues are not studied further herein.

4.6.1 Environmental Setting

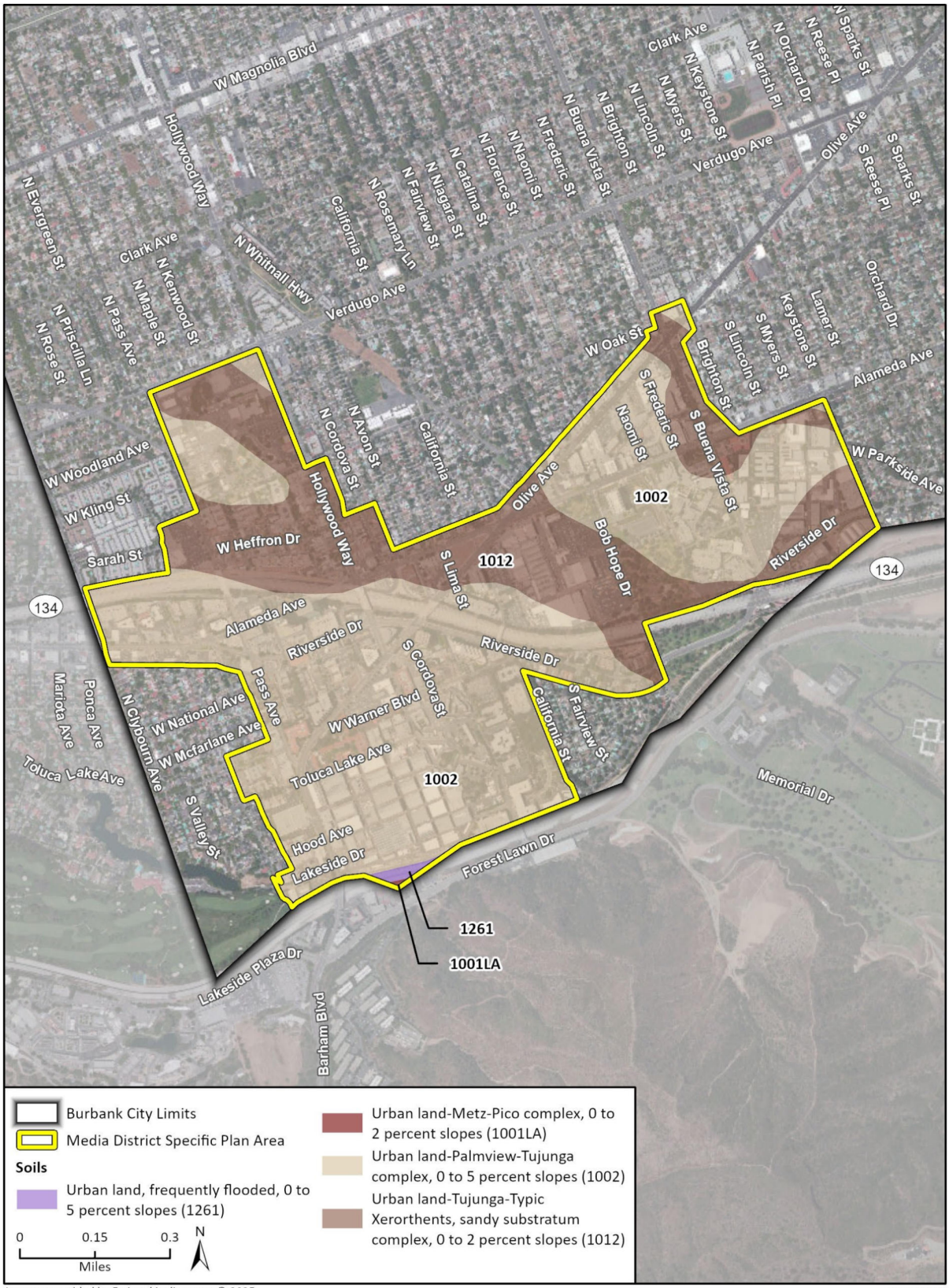
a. Geologic Setting

The City of Burbank (hereafter referred to as "City" or "Burbank") is situated in the Transverse Ranges geomorphic province, one of the 11 geomorphic provinces in California (California Geological Survey [CGS] 2002). The Transverse Ranges extend approximately 275 miles west-east from Point Arguello in Santa Barbara County, east to the San Bernardino Mountains, and south to the Anacapa-Santa Monica-Hollywood-Raymond-Cucamonga fault zone (Yerkes and Campbell 2005). Locally, Burbank is in the southeastern part of the San Fernando Valley, an approximately 23-mile-long, 12-mile-wide valley that is drained by the Los Angeles River. The San Fernando Valley is bordered on the south by the Santa Monica Mountains; on the west by the Simi Hills; on the north by the Santa Susana and San Gabriel Mountains; and the east by the Verdugo Mountains. The Burbank Media District Specific Plan Area (hereafter referred to as "Specific Plan Area") is partially bordered on the south by the Los Angeles River.

b. Local Soil Types

As shown in Figure 4.6-1, there are several soil types in the Specific Plan Area. Most of the Specific Plan Area is underlain by Urban land-Palmview-Tujunga and Xerothents, sandy substratum soil complexes, which include loam and sand. Other soils include loam and urban land-frequently flooded.

Figure 4.6-1 Soil Types Within Specific Plan Area



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Additional data provided by USGS, NRCS, SSURGO 2025.

22-13079 EPS
Fig 4.6-1 Soil Types Within Specific Plan Area

c. Seismic Setting

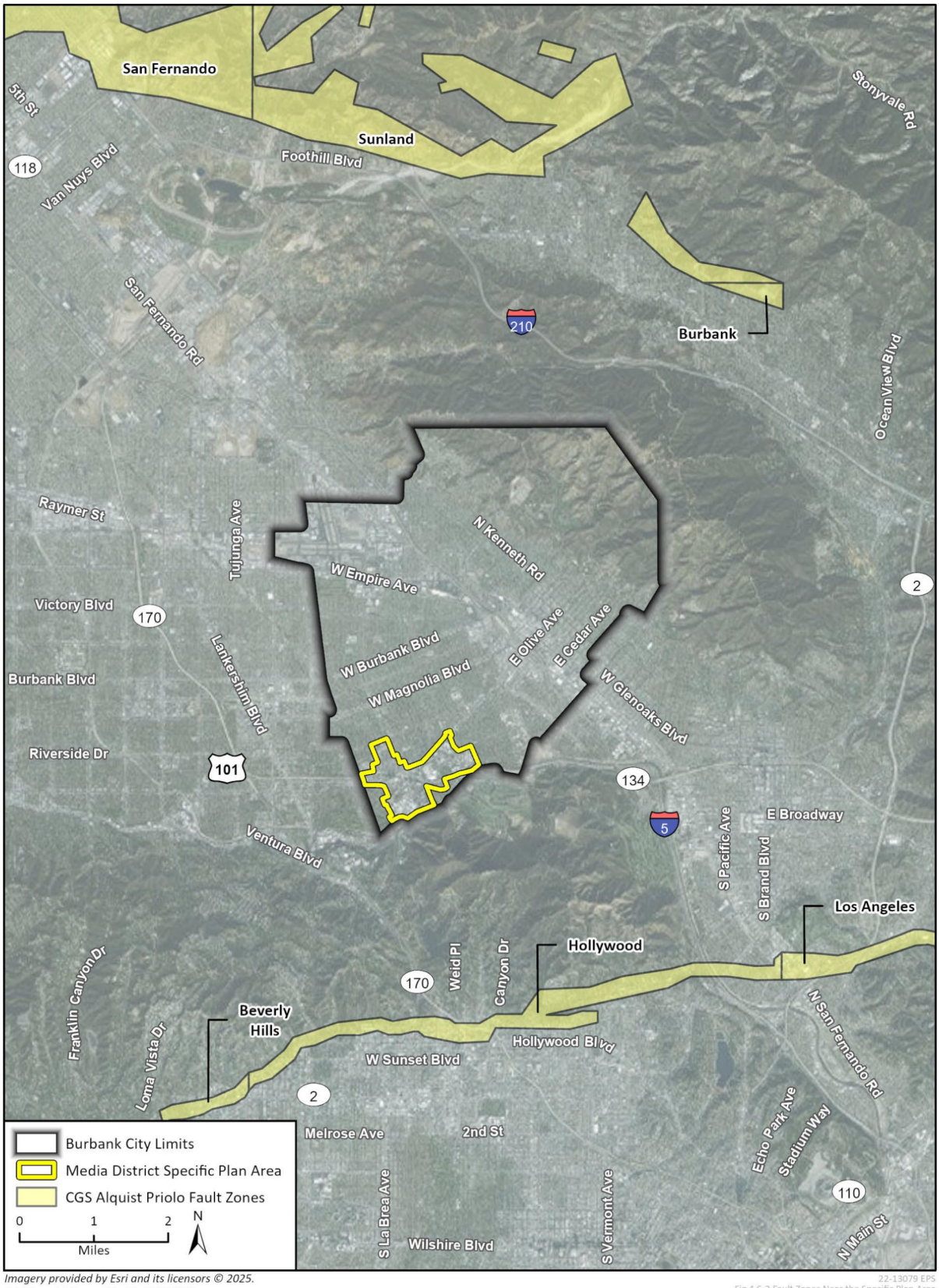
Seismically Induced Ground-Shaking

The U.S. Geological Survey defines active faults as those that have had surface displacement in Holocene time (about the last 11,000 years). Surface displacement can be recognized by the existence of cliffs in alluvium, terraces, offset stream courses, fault troughs and saddles, the alignment of depressions, sag ponds, and the existence of steep mountain fronts. Potentially active faults are ones that have had surface displacement during the last 1.6 million years. Inactive faults have not had surface displacement in the last 1.6 million years.

Faults generally produce damage in two ways: surface rupture and seismically induced ground shaking. Surface rupture is limited to areas very near the fault, while ground shaking can affect a wider area. The locations of some of the faults closest to the Specific Plan Area are shown in Figure 4.6-2. Seismic activity may occur from nearby faults, including those that together form the Beverly Hills Fault, Hollywood Fault, and Los Angeles Fault. While the Specific Plan Area is near several active faults, no active faults are known or suspected to traverse the Specific Plan Area, and the Specific Plan Area is not in a special seismic zone established by the Alquist-Priolo Special Studies Zones Act of 1972 (DOC 2023).

Several major faults in the larger southern California region, including the San Andreas Fault, have the potential to cause substantial damage in the event of a major earthquake. The San Andreas Fault is located approximately 30 miles northeast of the Specific Plan Area.

Figure 4.6-2 Fault Lines Near Specific Plan Area



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Additional data provided by CGS 2025.

22-13079 EPS
Fig 4.6-2 Fault Zones Near the Specific Plan Area

Liquefaction

Liquefaction is defined as the sudden loss of soil strength due to a rapid increase in soil pore water pressures resulting from seismic ground shaking. Liquefaction potential is dependent on such factors as soil type, depth to ground water, degree of seismic shaking, and the relative density of the soil. During ground shaking, the alluvial grains are packed into a tighter configuration. Pore water is squeezed from between the grains, increasing the pore pressure. As the pore pressure increases, the load bearing strength of the material decreases.

When liquefaction of the soil occurs, buildings and other objects on the ground surface may tilt or sink, and lightweight buried structures (such as pipelines) may float toward the ground surface. Liquefied soil may be unable to support its own weight or that of structures that could result in loss of foundation bearing or differential settlement. As a result, structures built on this material can sink into the alluvium, buried structures may rise to the surface or materials on sloped surfaces may run downhill. Liquefaction may also result in cracks in the ground surface followed by the emergence of a sand-water mixture. Other effects of liquefaction include lateral spread, flow failures, ground oscillations, and loss of bearing strength. The entirety of the Specific Plan Area is within a liquefaction hazard area, as depicted in Figure 4.6-3.

According to the Burbank2035 General Plan EIR Technical Background Report, the Specific Plan Area is underlain by recently deposited sediments that would have a moderate to high susceptibility to liquefaction if groundwater levels rise to within 50 feet of the ground surface (City of Burbank 2012). In the last 50 years, however, regional groundwater table levels have dropped in response to the increased volume of water extracted from wells. A 1993 map of groundwater contours for the upper Los Angeles River area shows that groundwater within the Specific Plan Area was measured at about 50 to 60 feet below the ground surface (City of Burbank 2012). Therefore, the Specific Plan Area would have a moderate to high susceptibility to liquefaction.

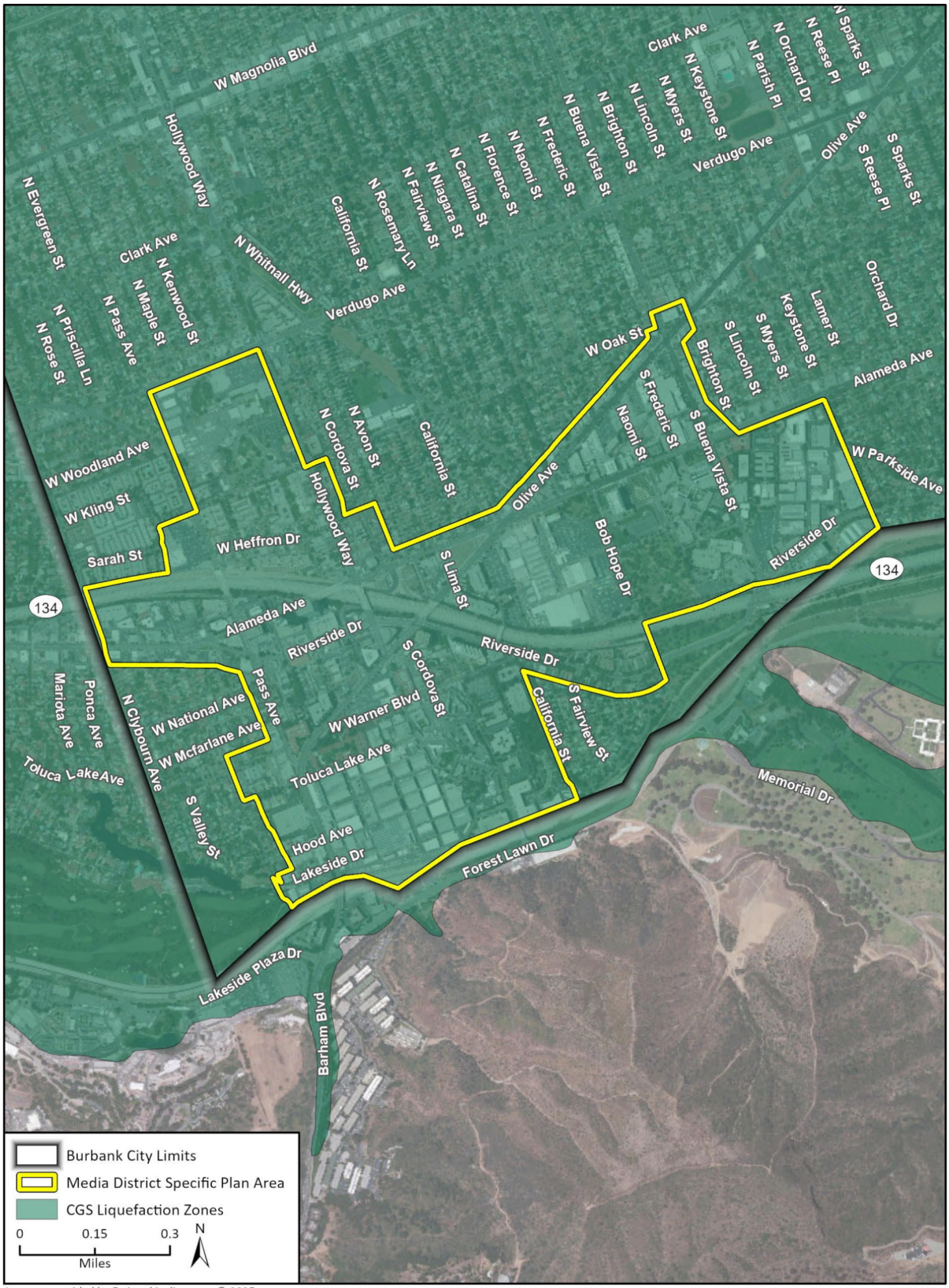
Lateral Spreading

Lateral spreading, which is closely related to liquefaction, occurs when a subsurface layer liquefies and gravitational and inertial forces cause the layer, and the overlying non-liquefied material, to move in a downslope direction. The potential for lateral spreading is highest in areas underlain by soft, saturated materials, especially where bordered by sloping banks or inclined planes to an adjacent open face bank or slope. As shown in Figure 4.6-3, the entire Specific Plan Area is within a liquefaction hazard zone and thus, would be subject to lateral spreading hazards.

Expansive Soils

During periods of water saturation, soils with high clay content tend to expand. Conversely, during dry periods, these soils tend to shrink. The amount of volume change depends upon the soil swell potential (amount of expansive clay in the soil), availability of water to the soil, and soil confining pressure. Swelling occurs when the soils containing clay become wet due to excessive water from poor surface drainage, over irrigation of lawns and planters, and sprinkler or plumbing leaks. These volume changes with moisture content can cause cracking of structures built on expansive soils. In addition, swelling clay soils can cause distress to lightly loaded structures, walks, drains, and patio slabs.

Figure 4.6-3 Liquefaction Hazard Zones Within Specific Plan Area



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Additional data provided by CGS 2025.

22-13079 EPS
Fig 4.6-3 Liquefaction Zones Within the Specific Plan Area

As shown in Figure 4.6-1, there are several soil types in the Specific Plan Area. Most of the Specific Plan Area is underlain by Urban land-Palmview-Tujunga and Xerothents, sandy substratum soil complexes, which include loam and sand. Other soils include loam and urban land-frequently flooded. While expansive soils could potentially be encountered throughout the Specific Plan Area, these predominantly loamy and sandy soils do not tend to have the high clay content that would create highly expansive soils.

Subsidence

Subsidence is the lowering of ground surface. It often occurs because of withdrawal of fluids (such as water and oil), and gas, from the subsurface. When these materials are removed from the subsurface, the overburden weight, which they had previously helped support through buoyant forces, is transferred to the soil structure. Subsidence typically occurs over a long period of time and results in a number of structural impacts. Facilities most affected by subsidence are long, surface infrastructure facilities such as canals, sewers, and pipelines.

The extraction of groundwater from an aquifer beneath an alluvial valley can result in subsidence or settlement of the alluvial soils. The factors that influence the potential occurrence and severity of alluvial soil settlement due to groundwater withdrawal include degrees of groundwater confinement; thickness of aquifer systems; individual and total thickness of fine-grained beds; and compressibility of the fine-grained layers. According to the United State Geographical Survey (USGS), the Specific Plan Area is not in or near an area subject to land subsidence (USGS 2025).

Erosive Soils

Soil erosion is the removal of soil by water and wind. The rate of erosion is estimated from four soil properties: texture, organic matter content, soil structure, and permeability. Other factors that influence erosion potential include the amount of rainfall and wind, the length and steepness of the slope, and the amount and type of vegetative cover. The Specific Plan Area's topographical terrain is primarily flat.

d. Paleontological Resources

Paleontological resources, or fossils, are the remains and traces of prehistoric life (Society of Vertebrate Paleontology [SVP] 2010). Fossils are typically preserved in layered sedimentary rocks and the distribution of fossils is a result of the sedimentary history of the geologic units within which they occur. Fossils occur in a non-continuous and often unpredictable distribution within some sedimentary units, and the potential for fossils to occur within sedimentary units depends on several factors. Although it is not possible to determine whether a fossil will occur in any specific location, it is possible to evaluate the potential for geologic units to contain scientifically significant paleontological resources and, therefore, evaluate the potential for impacts to those resources and provide mitigation for paleontological resources if they do occur during construction.

The Specific Plan Area is located in the *Burbank, California* U.S. Geological Survey 7.5-minute topographic quadrangle. The geology of the region surrounding the Specific Plan Area was mapped by Bedrossian and Roffers (2012) and Campbell et al. (2016), who identified three geologic units underlying the Specific Plan Area: Quaternary active alluvial fan deposits, Quaternary young alluvial fan deposits, and Quaternary young alluvial valley deposits. Figure 4.6-4 shows the geologic units in the Specific Plan Area.

Quaternary Active Alluvial Fan Deposits

Quaternary active alluvial fan deposits underlie parts of the Specific Plan Area near the Los Angeles River and in abandoned channels associated with Tujunga Wash (see Figure 4.6-4). Quaternary active alluvial fan deposits consist of unconsolidated silt, sand, gravel, and cobbles that are late Holocene in age (Bedrossian & Roffers 2012). Holocene-aged sediments are generally considered too young (i.e., less than 5,000 years old) to preserve paleontological resources (SVP 2010). Therefore, Quaternary active alluvial fan deposits have low paleontological sensitivity.

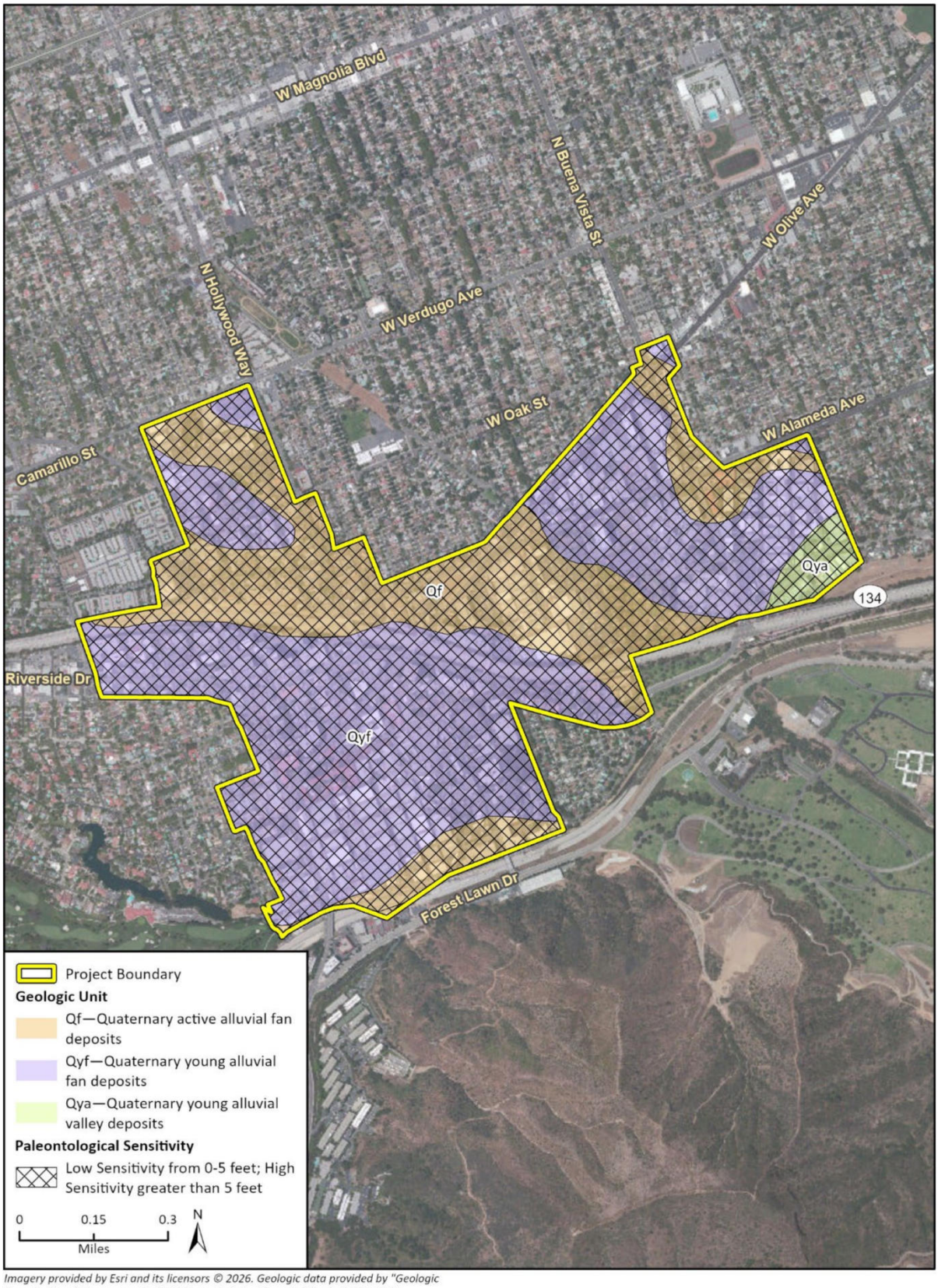
Quaternary Young Alluvial Fan Deposits and Quaternary Young Alluvial Valley Deposits

Quaternary young alluvial fan deposits underlie the majority of the Specific Plan Area (see Figure 4.6-4), and Quaternary young alluvial valley deposits underlie the southeastern corner of the Specific Plan Area. Quaternary young alluvial fan deposits and Quaternary young alluvial valley deposits are lithologically similar, consisting of unconsolidated to slightly consolidated silt, sand, gravel, and cobbles that are Holocene in age (Bedrossian & Roffers 2012). Holocene-aged sediments are generally considered too young (i.e., less than 5,000 years old) to preserve paleontological resources (SVP 2010). Therefore, Quaternary young alluvial fan deposits and Quaternary young alluvial valley deposits have low paleontological sensitivity.

Subsurface Geology

Holocene-aged sediments (e.g., Quaternary active alluvial fan deposits, Quaternary young alluvial fan deposits, Quaternary young alluvial valley deposits) may be underlain by older sediments in the subsurface. Early Holocene and Pleistocene-aged alluvial sediments have produced numerous scientifically significant paleontological resources within the San Fernando Valley and more broadly within Los Angeles County, including mastodon (*Mammut*), ground sloth (*Paramylodon*), bison (*Bison*), and horse (*Equus*) (Jefferson 2010; Paleobiology Database 2023; University of California Museum of Paleontology 2023). Therefore, Early Holocene and Pleistocene-aged alluvial sediments underlying the Specific Plan Area have high paleontological sensitivity. The depth at which the transition to sediments old enough (i.e., 5,000 years old; SVP 2010) depends on local topography, sedimentology, and development history, so it likely varies throughout the Specific Plan Area, perhaps as shallow as 5 feet below the surface.

Figure 4.6-4 Geologic Map and Paleontological Sensitivity of the Specific Plan Area



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4.6.2 Regulatory Setting

State and local authorities under a variety of statutes and guidelines share regulatory authority over geologic, soil, and paleontological resources.

a. Federal Regulations

Earthquake Hazards Reduction Act

The United States Congress passed the Earthquake Hazards Reduction Act in 1977 to reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards reduction program. To accomplish this goal, the act established the National Earthquake Hazards Reduction Program (NEHRP). This program was substantially amended in November 1990 by the National Earthquake Hazards Reduction Program Act (NEHRPA), which refined the description of agency responsibilities, program goals, and objectives.

Uniform Building Code

The Uniform Building Code (UBC) defines different regions of the United States and ranks them according to their seismic hazard potential. The five types of these regions are Seismic Zones 0 through 4, with Zone 0 having the least seismic potential, and Zone 4 having the highest seismic potential. The Specific Plan Area, along with all of southern California, is in Seismic Zone 4, the area of greatest seismic risk subject to the strictest building standards.

b. State Regulations

Alquist-Priolo Special Studies Zones Act

The Alquist-Priolo Special Studies Zones Act of 1972 was signed into law in 1972 and renamed the Alquist-Priolo Earthquake Fault Zoning Act in 1994. The primary purpose of this act is to mitigate the hazard of fault rupture by prohibiting the location of structures for human occupancy across the extent of an active fault. The Alquist-Priolo Act requires the State Geologist to delineate "Earthquake Fault Zones" along faults that are "sufficiently active" and "well defined." Sufficiently active faults show evidence of Holocene surface displacement (movement within the past 11,000 years) along one or more of their segments. The boundary of an "Earthquake Fault Zone" is generally about 500 feet from major active faults, and 200 to 300 feet from well-defined minor faults.

Regulations relating to erosion control are described in Section 4.9, *Hydrology and Water Quality*.

California Building Code

The California Building Code (CBC) is contained in the California Code of Regulations (CCR), Title 24, Part 2, which is a portion of the California Building Standards Code. Title 24 is assigned to the California Building Standards Commission, which by law is responsible for coordinating all building standards. The CBC incorporates by reference the federal Uniform Building Code with necessary California amendments. The CBC is a regulatory tool that includes building code standards to address geologic and seismic hazards. Approximately one-third of the text in the CBC has been tailored for California earthquake conditions.

California Environmental Quality Act (CEQA)

Paleontological resources are protected under CEQA, which states, in part, that a project will "normally" have a significant effect on the environment if it will disrupt or adversely affect a paleontological site except as part of a scientific study. Specifically, in Section VII(f) of Appendix G of the *CEQA Guidelines*, the Environmental Checklist Form, the question is posed as such: "Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature." To determine the uniqueness of a given paleontological resource, it must first be identified or recovered (i.e., salvaged). Therefore, CEQA mandates mitigation of adverse impacts, to the extent practicable, to paleontological resources.

CEQA does not define "a unique paleontological resource or site." However, the Society of Vertebrate Paleontology (SVP) has defined a "significant paleontological resource" in the context of environmental review as follows:

> Fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are typically to be older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 radiocarbon years). (SVP 2010)

The loss or destruction of paleontological resources meeting the criteria outlined above (i.e., a significant paleontological resource) would be a significant impact under CEQA, and the CEQA lead agency is responsible for ensuring that impacts to paleontological resources are mitigated, where practicable, in compliance with CEQA and other applicable statutes.

California Public Resources Code

Section 5097.5 of the Public Resources Code (PRC) states:

> A person shall not knowingly and willfully excavate upon, or remove, destroy, injure or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.
>
> [...] A violation of this section is a misdemeanor...

Here "public lands" means those owned by, or under the jurisdiction of, the state or any city, county, district, authority, or public corporation, or any agency thereof.

Seismic Hazards Mapping Act

The CGS also provides guidance with regard to seismic hazards. Under CGS's Seismic Hazards Mapping Act, seismic hazard zones are to be identified and mapped to assist local governments in land use planning. The intent of this publication is to protect the public from the effects of strong ground shaking, liquefaction, landslides, ground failure, or other hazards caused by earthquakes. In addition, CGS's Special Publications 117, "Guidelines for Evaluating and Mitigating Seismic Hazards in California," provides guidance for the evaluation and mitigation of earthquake-related hazards for projects within designated zones of required investigations.

c. Local Regulations

Burbank2035 General Plan

Chapter 7, *Safety Element*, of the Burbank2035 General Plan contain the following goals and policies related to geology that apply to the Project:

Goal 5: Seismic Safety: Injuries and loss of life are prevented, critical facilities function, and property loss and damage is minimized during seismic events.

> **Policy 5.1.** Require geotechnical reports for development within a fault area that may be subject to risks associated with surface rupture.
>
> **Policy 5.2.** Require geotechnical reports for new development projects in areas with the potential for liquefaction or landslide.
>
> **Policy 5.3.** Enforce seismic design provisions of the current California Building Standards Code related to geologic, seismic, and slope hazards.
>
> **Policy 5.4.** Encourage and facilitate retrofits of seismically high-risk buildings to reduce risks from seismic ground shaking.
>
> **Policy 5.5.** Facilitate the retrofitting of bridges and highway structures in the city to reduce risks associated with seismic ground shaking.

Chapter 6, *Open Space and Conservation Element*, of the Burbank2035 General Plan contains the following policy related to paleontological resources applicable to the Project:

> **Policy 6.1:** Recognize and maintain cultural, historical, archeological, and paleontological structures and sites essential for community life and identity.

Chapter 8, *Plan Realization* of the Burbank2035 General Plan includes an implementation program to put General Plan goals and policies into action. The following is included under *Program OSC-7: Development Review* to help minimize the potential impacts of project implementation on paleontological resources:

> If paleontological resources are discovered during earthmoving activities associated with future development projects, the construction crew shall immediately cease work in the vicinity of the find and notify the City. The project applicant(s) shall retain a qualified paleontologist to evaluate the resource and prepare a recovery plan in accordance with Society of Vertebrate Paleontology guidelines (1996). The recovery plan shall include, but is not limited to, a field survey, construction monitoring, sampling and data recovery procedures, museum storage coordination for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the lead agency to be necessary and feasible shall be implemented before construction activities can resume at the site where the paleontological resources were discovered (page 8-22).

Burbank Municipal Code

Burbank Municipal Code (BMC) Section 7-1-105(c) and (d) define the requirements of the Engineering Geological Report and Soil Engineering Report required when a project applies for a grading permit. The Engineering Geological Report shall be prepared and signed by an engineering geologist and shall include a description of the geology of the site, conclusions and recommendations regarding the

effect of geological conditions on the proposed development, and a geologic map of sufficient detail as to portray the existing field condition. The Soils Engineering Report must be prepared by a soils engineer and shall include data regarding the nature, distribution and strength of existing soils, conclusions and recommendations for grading procedures, design criteria for corrective measures, or other criteria as may be necessary. Conclusions from these reports are to be incorporated into the grading plans or specifications for a project.

BMC Section 9-3-404 defines the City's requirements for a building or grading permit, which include a local Storm Water Pollution Prevention Plan (SWPPP) and a wet weather erosion control plan (WWECP), if construction were to occur during the rainy season.

BMC Sections 9-1-16-200 and 9-1-16-400 establish minimum standards for structural seismic resistance to promote public safety and welfare by reducing the risk of death or injury that may result from the effects of earthquakes on reinforced concrete walls, reinforced masonry wall buildings, or wood-framed multi-story buildings.

Ordinance No. 24-4,021

On January 10, 2025, the City adopted Ordinance No. 24-4,021, amending Title 9, Chapter 1, Article 16, Division 4 of the BMC. Ordinance No. 24-4,021 established mandatory earthquake hazard reduction standards in existing wood frame residential buildings with soft, weak, or open front walls.

4.6.3 Impact Analysis

a. Thresholds of Significance

According to Appendix G of the *CEQA Guidelines*, impacts related to geology and soils would be potentially significant if implementation of the Specific Plan would do any of the following:

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault
2. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking
3. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction
4. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides
5. Result in substantial soil erosion or the loss of topsoil
6. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse
7. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property
8. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater
9. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature

Thresholds 2, 3, 5, 6, 7, and 9 are analyzed below.

b. Effects Found Not to be Significant

Thresholds 1, 4, and 8 were determined to have a less than significant impact and, therefore, are discussed under Section 4.19, *Effects Found Not to be Significant* and summarized below.

The Specific Plan Area is not located within an Alquist-Priolo Earthquake Fault Zone, and no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Specific Plan Area. Since there are no known active or potentially active faults passing through the Specific Plan Area, on-site ground rupture due to movement of an underlying fault would not occur and impacts would be less than significant.

The Specific Plan Area is located in an urbanized area that is relatively flat. According to the Department of Conservation (DOC) Earthquake Zones of Required investigation map, no portion of the Specific Plan Area is located in a landslide hazard zone (DOC 2023). Compliance with State and local regulations would ensure that no landslide impacts would occur. Therefore, the proposed Project would not directly or indirectly cause impacts related to landslides and impacts would be less than significant.

The Specific Plan Area is served by a community wastewater system. Per BMC 8-1-308, all new development associated with the proposed Project must be connected to the City's wastewater system. Therefore, there would be no impact related to the use of septic tanks or alternative wastewater disposal systems.

c. Methodology

Because the proposed Project pertains to an approximately 544-acre portion of the City and this Program EIR is aimed at identifying the broad, Specific Plan Area-wide impacts of implementing the proposed updates, methods for research consisted of a desktop analysis and definition of the existing conditions that characterize the general geologic setting and paleontological sensitivity in the Specific Plan Area and surrounding region. These potential impacts and any associated mitigation measures would apply to the entire Specific Plan Area and would be tied directly to projects with physical construction activities.

Paleontological Resources Sensitivity

Paleontological sensitivity refers to the potential for a geologic unit to produce scientifically significant fossils. Direct impacts to paleontological resources occur when earthwork activities, such as grading or trenching, cut into the geologic deposits within which fossils are buried and physically destroy the fossils. Since fossils are the remains of prehistoric animal and plant life, they are considered to be nonrenewable. Such impacts have the potential to be significant and, under the *CEQA Guidelines*, may require mitigation. Sensitivity is determined by rock type, past history of the geologic unit in producing significant fossils, and fossil localities recorded from that unit. Paleontological sensitivity is derived from the known fossil data collected from the entire geologic unit, not just from a specific survey.

The discovery of a vertebrate fossil locality is of greater significance than that of an invertebrate fossil locality, especially if it contains a microvertebrate assemblage. The recognition of new vertebrate fossil locations could provide important information on the geographical range of the taxa, their radiometric age, evolutionary characteristics, depositional environment, and other important scientific research questions. Vertebrate fossils are almost always significant because they occur more

rarely than invertebrates or plants. Thus, geological units having the potential to contain vertebrate fossils are considered the most sensitive.

The Society for Vertebrate Paleontology (SVP) outlines in its Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources (SVP 2010) guidelines for categorizing paleontological sensitivity of geologic units in a project area. The SVP (2010) describes sedimentary rock units as having a high, low, undetermined, or no potential for containing significant nonrenewable paleontological resources. This criterion is based on rock units within which vertebrates or significant invertebrate fossils have been determined by previous studies to be present or likely to be present. Significant paleontological resources are fossils or assemblages of fossils, which are unique, unusual, rare, uncommon, diagnostically or stratigraphically, taxonomically, or regionally. The paleontological sensitivity of the Specific Plan Area has been evaluated according to the following SVP (2010) categories, which are presented below.

High Potential (Sensitivity)

Rock units from which significant vertebrate or significant invertebrate fossils or significant suites of plant fossils have been recovered are considered to have a high potential for containing significant non-renewable fossiliferous resources. These units include, but are not limited to, sedimentary formations and some volcanic formations, which contain significant nonrenewable paleontological resources anywhere within their geographical extent, and sedimentary rock units temporally or lithologically suitable for the preservation of fossils. Sensitivity comprises both (a) the potential for yielding abundant or significant vertebrate fossils or for yielding a few significant fossils, large or small, vertebrate, invertebrate, or botanical and (b) the importance of recovered evidence for new and significant taxonomic, phylogenetic, ecologic, or stratigraphic data. Areas, which contain potentially datable organic remains older than recent, including deposits associated with nests or middens, and areas that may contain new vertebrate deposits, traces, or trackways, are also classified as significant. Full-time monitoring is typically recommended during any project-related ground disturbance in geologic units with high sensitivity.

Low Potential (Sensitivity)

Sedimentary rock units that are potentially fossiliferous but have not yielded fossils in the past or contain common and/or widespread invertebrate fossils of well documented and understood taphonomic (processes affecting an organism following death, burial, and removal from the ground), phylogenetic species (evolutionary relationships among organisms), and habitat ecology. Reports in the paleontological literature or field surveys by a qualified vertebrate paleontologist may allow determination that some areas or units have low potentials for yielding significant fossils prior to the start of construction. Generally, these units will be poorly represented by specimens in institutional collections and will not require protection or salvage operations.

Undetermined Potential (Sensitivity)

Specific areas underlain by sedimentary rock units for which little information is available are considered to have undetermined fossiliferous potentials. Field surveys by a qualified vertebrate paleontologist to specifically determine the potential of the rock units are required before programs of impact mitigation for such areas may be developed.

No Potential

Rock units of metamorphic or igneous origin are commonly classified as having no potential for containing significant paleontological resources. For geologic units with no sensitivity, a paleontological monitor is not required.

d. Project Impacts

Threshold 2:	Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Impact GEO-1 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT COULD RESULT IN EXPOSURE OF PEOPLE OR STRUCTURES TO RISK OF LOSS, INJURY, OR DEATH INVOLVING STRONG SEISMIC GROUND SHAKING; HOWEVER, IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH REQUIRED ADHERENCE TO EXISTING REGULATIONS.

The Specific Plan Area is located in the highly seismic Southern California region, where several fault systems are considered to be active or potentially active. Seismic activity from nearby faults include those that form the Beverly Hills Fault, Hollywood Fault, and Los Angeles Fault, which could cause substantial damage from ground shaking in the event of a major earthquake. The nearest fault is the Hollywood Fault, located approximately three miles south of the Specific Plan Area (DOC 2023). Future development projects under the proposed Project may be subject to ground shaking in the event of an earthquake originating along one of the faults designated as active or potentially active in the Southern California region. This geologic hazard is common throughout California, and, as such, future development projects under the proposed Project would pose no greater risk to public safety or destruction of property than is already present throughout the region.

Projects carried out under the proposed Project would be designed and constructed in accordance with State and local building codes to reduce the potential for exposure of people or structures to seismic risks. Future development in the Specific Plan Area would be required to adhere to the Uniform Building Code (UBC) and the latest CBC. The UBC and CBC development standards regulate the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking. The impact to people, buildings, or structures in the Specific Plan Area from strong seismic ground shaking would be reduced by the required conformance with applicable building codes and accepted engineering practices. Therefore, future development projects under the proposed Project would not increase the frequency or severity of ground shaking.

Determination

Less than significant impact

Threshold 3:	Would the proposed Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Impact GEO-2 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT COULD RESULT IN EXPOSURE OF PEOPLE OR STRUCTURES TO A RISK OF LOSS, INJURY, OR DEATH INVOLVING LIQUEFACTION; HOWEVER, IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH REQUIRED ADHERENCE TO EXISTING REGULATIONS.

Liquefaction is a phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions

exist: shallow groundwater; low density, fine, clean sandy soils; and strong ground motion. Liquefaction-related effects include loss of bearing strength, amplified ground oscillations, lateral spreading, and flow failures.

According to the DOC Earthquake Zones of Required Investigation map and as shown in Figure 4.6-3, the Specific Plan Area is at risk of seismically induced liquefaction (DOC 2023). As detailed under Impact GEO-1, development in the Specific Plan Area would be required to adhere to the UBC and CBC development standards. Compliance with City and State seismic and building codes would reduce impacts associated with liquefaction from seismic ground shaking. Moreover, future development projects under the proposed Project would not exacerbate liquefaction potential in the area, as the Specific Plan Area is largely built out and future development associated with the project would occur on previously developed sites that would not significantly disturb groundwater and soil conditions. Therefore, implementation of the proposed Project would not directly or indirectly cause substantial adverse effects from liquefaction risk, and impacts would be less than significant.

Determination

Less than significant impact

Threshold 5: Would the project result in substantial soil erosion or the loss of topsoil?

Impact GEO-3 CONSTRUCTION OF DEVELOPMENT PROJECTS CARRIED OUT UNDER THE PROPOSED PROJECT COULD RESULT IN SOIL EROSION, BUT IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH REQUIRED ADHERENCE TO EXISTING REGULATIONS.

Soil erosion or the loss of topsoil may occur when soils are disturbed but not secured or restored, such that wind or rain events may mobilize disturbed soils, resulting in their transport off-site. Ground-disturbing activities associated with the construction of future development projects under the proposed Project would have the potential to result in the removal and erosion of topsoil during grading and excavation.

Because the proposed Project would prioritize new development in areas that are already built out, the potential for erosion would primarily be limited to temporary effects of possible topsoil loss at future project construction sites. Standard construction Best Management Practices (BMPs) would be implemented to avoid or minimize soil erosion associated with ground-disturbing activities. Implementation of erosion control measures required by BMC Section 9-3-404 would be designed to capture and treat runoff from construction sites, such as through stabilization of construction entrance roadways and on-site retention of eroded sediments and pollutants. In addition, construction activities that disturb one or more acres of land are subject to the NPDES Construction General Permit process, which would require development of a SWPPP that outlines project specific BMPs to control erosion, sediment release, and otherwise reduce the potential for discharge of pollutants from construction into stormwater. Typical BMPs include, but are not limited to, installation of silt fences, erosion control blankets, and anti-tracking pads at site exits to prevent off-site transport of soil material.

With implementation of the requirements described above, erosion from demolition and construction activities associated with future development projects under the proposed Project would be controlled through implementation of the requirements and BMPs contained in existing regulations, including the NPDES Construction General Permit and BMC. Furthermore, BMPs for post-construction erosion and sediment control would be implemented to comply with applicable regulations, which would improve future erosion conditions. Compliance with the regulations

discussed above would reduce the potential for soil erosion from construction, and impacts would be less than significant.

Determination

Less than significant impact

Threshold 6:	Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Impact GEO-4 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT MAY BE AT RISK OF LANDSLIDES, LATERAL SPREADING, LIQUEFACTION, OR COLLAPSE; HOWEVER, IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH REQUIRED ADHERENCE TO EXISTING REGULATIONS.

Impacts related to landslides and liquefaction are addressed under Section 4.6.3.b, *Effects Found Not to be Significant* and Impact GEO-2, respectively; therefore, this discussion focuses on impacts related to unstable soils as a result of lateral spreading, subsidence, or collapse.

Lateral spreading occurs as a result of liquefaction; accordingly, liquefaction-prone areas would also be susceptible to lateral spreading. As shown in Figure 4.6-3, the entire Specific Plan Area is within a liquefaction hazard zone. However, as concluded under Impact GEO-2, compliance with City and State seismic and building codes would reduce potential impacts associated with liquefaction from seismic ground shaking to a less-than-significant level. Thus, compliance with the City and State seismic and building codes detailed under Impact GEO-2 would reduce impacts associated with lateral spreading to a less-than-significant level.

Subsidence occurs at great depths below the surface when subsurface pressure is reduced by the withdrawal of fluids (e.g., groundwater, natural gas, or oil) resulting in sinking of the ground. As detailed in Section 4.6.1, *Setting*, the Specific Plan Area is not in or near an area subject to land subsidence (USGS 2025). Therefore, development under the proposed Project would have a less than significant impact related to subsidence.

Further, projects carried out under the proposed Project would be designed and constructed in accordance with State and local building codes to reduce the potential for exposure of people or structures to seismic risks. Future projects would be required to comply with the CBC's minimum standards for structural design and site development, including, but not limited to, excavation, grading, and earthwork construction; fills and embankments; foundation investigations; and liquefaction potential and soils strength loss. Future projects would also be required to comply with BMC Sections 9-1-16-200 and 9-1-16-400, which require earthquake hazard reduction in existing buildings. Adherence to these State and local requirements would reduce unstable geologic unit or soil impacts to the maximum extent practicable with current engineering practices. Therefore, impacts related to unstable geologic units or soils would be less than significant.

Determination

Less than significant impact

Threshold 7:	Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Impact GEO-5 DEVELOPMENT CARRIED OUT UNDER THE PROPOSED PROJECT MAY RESULT IN CONSTRUCTION OF STRUCTURES ON EXPANSIVE SOILS THAT COULD CREATE A SUBSTANTIAL RISK TO LIFE OR PROPERTY, BUT ALL NEW DEVELOPMENT WOULD BE REQUIRED TO COMPLY WITH THE STANDARDS OF THE CBC, WHICH WOULD ENSURE THAT EXPANSIVE SOILS ARE REMEDIATED OR THAT FOUNDATIONS AND STRUCTURES ARE ENGINEERED TO WITHSTAND THE FORCES OF EXPANSIVE SOIL. COMPLIANCE WITH THESE REQUIREMENTS WOULD REDUCE THIS IMPACT TO A LESS THAN SIGNIFICANT LEVEL.

Expansive soils are generally clays that increase in volume when saturated and shrink when dried. Wetting can occur naturally in a number of ways, such as absorption from the air, rainfall, groundwater fluctuations, lawn watering and broken water or sewer lines. In hillside areas, as expansive soils expand and contract, gradual downslope creep may occur, eventually causing landslides. Clay soils also retain water and may act as lubricated slippage planes between other soil/rock strata, also producing landslides, often during earthquakes or unusually moist conditions. The shrink-swell characteristics of soils can vary widely within short distances, depending on the relative amount and type of clay. Expansive soils are also often prone to erosion. Foundations of structures placed on expansive soils may swell during the wet season and shrink during the succeeding dry season, potentially resulting in foundation damage. Highly expansive soils can cause structural damage to foundations and roads without proper structural engineering and are generally less suitable or desirable for development than non-expansive soils because of the necessity for detailed geologic investigations and costlier grading applications. As described in Section 4.6.1 and illustrated in Figure 4.6-1, most of the Specific Plan Area is located on loamy and sandy soils that do not have a high clay content, decreasing chances of substantial risks to life or property due to expansive soils.

New development built on potentially expansive soils would be required to comply with the CBC, which includes requirements to address soil-related hazards. Typical measures to treat hazardous soil conditions involve removal, proper fill selection, and compaction. In cases where soil remediation is not feasible, the CBC requires structural reinforcement of foundations to resist the forces of expansive soils. Compliance with the requirements of the CBC would reduce impacts related to expansive soils to a less than significant level.

Determination

Less than significant impact

Threshold 9:	Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Impact GEO-6 DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT HAS THE POTENTIAL TO IMPACT PALEONTOLOGICAL RESOURCES DURING CONSTRUCTION ACTIVITIES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

Significant impacts to paleontological resources can only be determined once a specific project has been proposed because the effects are dependent on both the individual project site conditions and the characteristics of the proposed ground-disturbing activity. Ground-disturbing activities associated with construction facilitated by the proposed Project have the potential to damage or destroy paleontological resources that may be present on or below the ground surface in sediments with high

paleontological sensitivity. In areas that have been previously developed, impacts to paleontological resources can still occur if subsequent ground-disturbing activities reach beyond the depth of previous excavations. Consequently, damage to or destruction of fossils could occur due to development under the proposed Project. Impacts would be potentially significant.

Mitigation Measures

GEO-1a Paleontological Resources Assessment

The City of Burbank shall require the following for projects that have the potential to impact previously undisturbed sediments greater than five feet below the surface in the Specific Plan Area, including sediments at depths beyond where previous excavations have reached.

Prior to initial ground disturbance, the project applicant shall retain a Qualified Professional Paleontologist, as defined by Society of Vertebrate Paleontology (SVP; 2010), to conduct a paleontological resources assessment (PRA). The PRA shall determine the paleontological sensitivity of geologic formations underlying the proposed disturbance area, consistent with SVP (2010) guidelines for categorizing paleontological sensitivity, and the potential for the project to impact those formations, including a paleontological records search of the Natural History Museum of Los Angeles County (NHMLAC). The specific nature of the project's ground-disturbing activities, local natural topography, and depth of previous disturbance should be taken into account for this impact analysis. If the PRA determines that the project may impact paleontological resources, then the Developer shall implement GEO-1b to mitigate those impacts.

GEO-1b Paleontological Resources Mitigation

If the PRA determines that a project may significantly impact paleontological resources, the following actions shall be enacted:

- Qualified Paleontologist per Society of Vertebrate Paleontology (SVP 2010) guidelines to review project plans to determine if underlying paleontologically sensitive units (i.e., early Holocene to Pleistocene age deposits [Qoa]) could be impacted. If potentially significant impacts are identified, the qualified professional paleontologist shall prepare and implement a Paleontological Resources Mitigation Plan (PRMP). In general, ground-disturbing activities within previously undisturbed paleontologically sensitive sediments should be monitored on a full-time basis. The PRMP shall describe mitigation requirements, including paleontological monitoring procedures; communication protocols to be followed in the event that an unanticipated fossil discovery is made during project development; and preparation, curation, and reporting requirements. The PRMP shall be submitted to the City prior to the beginning of construction for review and approval.
- The Qualified Paleontologist or his or her designee shall conduct Worker Environmental Awareness Program (WEAP) training for the general contractor, subcontractor(s), and all construction workers participating in earth disturbing activities, regarding the appearance of fossils and the procedures for notifying paleontological staff in the event that fossils are discovered by on-site personnel. The WEAP shall be conducted at the time of a preconstruction meeting. A training acknowledgment form must be signed by all workers who receive the training and retained by the City.
- Monitoring during ground construction activities (i.e., grading, trenching, foundation work, and other excavations) shall be conducted by a qualified paleontological monitor, who is defined as an individual who meets the minimum qualifications per standards set forth by the SVP (2010),

which includes a B.S. or B.A. degree in geology or paleontology with one year of monitoring experience and knowledge of collection and salvage of paleontological resources. The duration and timing of the monitoring and the location and extent of proposed ground disturbance shall be outlined in the PRMP. If the Qualified Paleontologist determines that the monitoring methods should be changed from what is outlined in the PRMP based on the specific geologic conditions at the surface or at depth (e.g., reduced/increased in frequency, ceased entirely), the Qualified Paleontologist may recommend such changes to the City for their review and approval.

- In the event a fossil is discovered by construction personnel or the paleontological monitor, all work in the immediate vicinity of the find shall cease and the Qualified Paleontologist shall be contacted to evaluate the find before re-starting work in the area. If it is determined that the fossil(s) is (are) scientifically significant, the Qualified Paleontologist shall complete the mitigation outlined below (GEO-1c) to mitigate impacts to significant fossil resources.

GEO-1c Fossil Discovery, Preparation, And Curation

If a paleontological resource is discovered at any time during earthmoving activities, the construction contractor shall ensure that all construction activities in the immediate area of the find are halted and diverted, and the City is contacted. A Qualified Paleontologist shall be retained (if not done so already) to evaluate the discovery. The paleontologist shall have the authority to temporarily direct, divert, or halt construction activity around the find until it is assessed for scientific significance and collected to ensure that the fossil(s) can be removed in a safe and timely manner. Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a scientific institution with a permanent paleontological collection (such as the NHMLAC]) along with all pertinent field notes, photos, data, and maps.

Significance After Mitigation

Individual future development projects under the proposed Project would be subject to further environmental review and, as appropriate, project-specific mitigation. Implementation of Mitigation Measure GEO-1 would reduce potential impacts to paleontological resources to a level of less than significant. Because implementation of the mitigation measures would be specific to a project site, it is not anticipated that any secondary environmental impacts related to paleontological resources would occur

Determination

Less than significant with mitigation incorporated

4.6.4 Cumulative Impacts

The geographic extent of cumulative analysis for geology and soils is the City of Burbank, particularly areas of anticipated development under the Downtown Burbank Transit Oriented Development (TOD) Specific Plan (a consolidation and update of the North San Fernando Boulevard Master Plan and the Burbank Center Plan) and the Golden State Specific Plan (GSSP), as described in Section 3, *Environmental Setting*. The Downtown TOD Specific Plan would facilitate development of up to 9,944 residential units and 6,083,657 square feet of commercial and business development land uses; and the GSSP would facilitate development of up to 7,205 residential units and 3,149,623 square feet of commercial and business development land uses. Cumulative impacts may occur if impacts of the proposed Project combine with similar impacts of other projects in the cumulative scenario.

Fault Rupture

The City is not located within an Alquist-Priolo Earthquake Fault Zone, and no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the City. As such, on-site ground rupture due to movement of an underlying fault would not occur. Cumulative development would be required to comply with applicable State and local regulations related to seismic stability, which would further minimize the risk of fault rupture. For these reasons, the incremental effect of the proposed Project related to fault rupture would not be cumulatively considerable and cumulative impacts would be less than significant.

Ground Shaking

The City is located within the highly seismic Southern California region, where several fault systems are active or potentially active. Similar to the proposed Project, cumulative development under the Downtown TOD Specific Plan and the GSSP may be subject to ground shaking in the event of an earthquake originating along one of the faults designated as active or potentially active in the Southern California region. Ground shaking is common throughout California, and, as such, cumulative development would pose no greater risk to public safety or destruction of property than is already present throughout the region. Cumulative development would be required to comply with applicable State and local regulations related to seismic stability, which would further minimize the risk of ground shaking. For these reasons, the incremental effect of the proposed Project related to ground shaking would not be cumulatively considerable and cumulative impacts would be less than significant.

Liquefaction

The majority of the City is within a liquefaction hazard zone. Similar to the proposed Project, future development projects under the Downtown TOD Specific Plan and the GSSP would not exacerbate liquefaction potential in the area than is already present throughout the region. Cumulative development would be required to comply with applicable State and local regulations related to seismic stability, which would further minimize the risk of liquefaction. For these reasons, the incremental effect of the proposed Project related to liquefaction would not be cumulatively considerable and cumulative impacts would be less than significant.

Landslides

Cumulative development would occur within the City of Burbank, which is located in an urbanized area that is relatively flat and the majority of the City is not located in a landslide hazard zone designated by the DOC. Cumulative development would be required to comply with applicable State and local regulations related to seismic stability, which would further minimize the risk of landslides. For these reasons, the incremental effect of the proposed Project related to landslides would not be cumulatively considerable and cumulative impacts would be less than significant.

Soil Erosion

Similar to the proposed Project, ground-disturbing activities associated with construction of development projects under the Downtown TOD Specific Plan and the GSSP would have the potential to result in the removal and erosion of topsoil during grading and excavation. Standard construction BMPs would be implemented to avoid or minimize soil erosion associated with ground-disturbing activities. Cumulative development would be required to comply with applicable State and local

regulations related to soil erosion, which would further minimize the risk of soil erosion. For these reasons, the incremental effect of the proposed Project related to soil erosion would not be cumulatively considerable and cumulative impacts would be less than significant.

Unstable Soils

Cumulative development would occur within the City, the majority of which is within a liquefaction hazard zone and thus cumulative development would be susceptible to liquefaction and lateral spreading. However, as described above, the majority of the City is not within a landslide hazard zone or area subject to land subsidence and would not be susceptible to landslides or subsidence. Cumulative development would be required to comply with applicable State and local regulations related to soil erosion, which would further minimize the risk of soil erosion. For these reasons, the incremental effect of the proposed Project related to soil erosion would not be cumulatively considerable and cumulative impacts would be less than significant. Cumulative development would be required to comply with applicable State and local regulations related to seismic stability, which would further minimize the risk of lateral spreading, liquefaction, or collapse. For these reasons, the incremental effect of the proposed Project related to unstable soils would not be cumulatively considerable and cumulative impacts would be less than significant.

Expansive Soils

The Specific Plan Area is located on loamy and sandy soils that do not have a high clay content, decreasing chances of substantial risks to life or property due to expansive soils. Similar to the proposed Project, new development under the Downtown TOD Specific Plan and the GSSP built on potentially expansive soils would be required to comply with the CBC, which includes requirements to address soil-related hazards.

Potential impacts associated with expansive soils under the proposed Project would be less than significant with adherence to applicable State and local regulations related to seismic stability. Impacts associated with expansive soils are site-specific, such that cumulative impacts would only occur if other projects in the cumulative scenario would occur on the same site and/or affect the same expansive soils as a project under the proposed Project. As such, with adherence to applicable State and local regulations related to seismic stability, the incremental effect of the proposed Project related to expansive soils would not be cumulatively considerable and cumulative impacts would be less than significant.

Septic Tanks

The City is served by a community wastewater system. Per BMC Section 8-1-308, all new development associated with the Downtown TOD Specific Plan and the GSSP must be connected to the City's wastewater system, similar to the proposed Project. With adherence to BMC Section 8-1-308, the incremental effect of the proposed Project related to septic tanks would not be cumulatively considerable and there would be no cumulative impact.

Paleontological Resources

The geographic extent of cumulative analysis for paleontological resources is the City of Burbank, particularly areas of anticipated development under the Downtown Burbank TOD Specific Plan (a consolidation and update of the North San Fernando Boulevard Master Plan and the Burbank Center Plan) and the GSSP, as described in Section 3, *Environmental Setting*. As described in Section 3, *Environmental Setting,* the Downtown TOD Specific Plan would facilitate development of up to 9,944

residential units and 6,083,657 square feet of commercial and business development land uses; and the GSSP would facilitate development of up to 7,205 residential units and 3,149,623 square feet of commercial and business development land uses. Cumulative impacts may occur if impacts of the proposed Project combine with similar impacts of other projects in the cumulative scenario.

Impacts to paleontological resources are site-specific, such that cumulative impacts would only occur if other projects in the cumulative scenario would occur on the same site and/or affect the same paleontological resource(s) as a project under the proposed Project. As discussed in Section 4.6.3, *Impact Analysis*, potential impacts to paleontological resources under the proposed Project are considered less than significant with implementation of Mitigation Measures GEO-1a through GEO-1c to reduce potential impacts to paleontological resources by creating added protections for potentially sensitive paleontological sites. With adherence to this mitigation measure, the incremental effect of the proposed Project related to paleontological resources would not be cumulatively considerable and cumulative impacts would be less than significant.

4.7 GHG Emissions

This section evaluates the potential environmental impacts related to greenhouse gas (GHG) emissions associated with the implementation of the proposed Project. Specifically, this Section reviews the proposed Project's impact related to emission of GHG emissions and consistency with applicable plans adopted for the purpose of reducing GHG emissions.

4.7.1 Environmental Setting

a. Climate Change and Greenhouse Gasses

Gases that absorb and re-emit infrared radiation in the atmosphere are called GHGs. GHGs are emitted by both natural processes and human activities. The accumulation of GHGs in the atmosphere regulates Earth's temperature. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2); methane (CH_4); nitrous oxide (N_2O); fluorinated gases, such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs); and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

Different types of GHGs have varying global warming potentials (GWP). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emitted, referred to as carbon dioxide equivalent (CO_2e), which is the amount of GHG emitted multiplied by its GWP. Carbon dioxide has a 100-year GWP of one. By contrast, methane has a GWP of 25, meaning its global warming effect is 25 times greater than CO_2 on a molecule per molecule basis (Intergovernmental Panel on Climate Change [IPCC] 2023).[1]

GHGs are emitted by natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are usually by-products of fossil fuel combustion, and CH_4 results from off-gassing associated with agricultural practices and landfills. Human-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and SF_6.

Climate change is the observed increase in the average temperature of Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term "climate change" is often used interchangeably with the term "global warming," but climate change is preferred because it conveys that other changes are happening in addition to rising temperatures. The baseline against which these changes are measured originates in historical records that identify temperature changes that occurred in the past, such as during previous ice ages. The global climate is changing continuously, as evidenced in the geologic record, which indicates repeated episodes of substantial warming and cooling. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of

[1] The IPCC's (2021) *Sixth Assessment Report* determined that CH_4 has a GWP of 30. However, the 2017 Climate Change Scoping Plan published by the California Air Resources Board uses a GWP of 25 for CH_4, consistent with the IPCC's (2007) *Fourth Assessment Report*. Therefore, this analysis utilizes a GWP of 25.

warming over the past 150 years. The IPCC expressed that the rise and continued growth of atmospheric CO_2 concentrations is unequivocally due to human activities in the IPCC's Sixth Assessment Report (2021). Human influence has warmed the atmosphere, ocean, and land, which has led the climate to warm at an unprecedented rate in the last 2,000 years. It is estimated that, between the period of 1850 through 2019, a total of 2,390 gigatons of anthropogenic CO_2 was emitted. It is likely that anthropogenic activities have increased the global surface temperature by approximately 1.07 degrees Celsius (°C) between the years 2010 through 2019 (IPCC 2023). Furthermore, since the late 1700s, estimated concentrations of CO_2, CH_4, and N_2O in the atmosphere have increased by over 43 percent, 156 percent, and 17 percent, respectively, primarily due to human activity. Emissions resulting from human activities are, thereby, contributing to an average increase in Earth's temperature.

The accumulation of GHGs in the atmosphere regulates Earth's temperature. Without the natural heat-trapping effect of GHGs, Earth's surface would be about 33°C cooler (World Meteorological Organization 2023). GHG emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, are believed to have elevated the concentration of these gases in the atmosphere beyond the level of concentrations that occur naturally.

b. Impacts of Global Climate Change in California

Globally, climate change has the potential to affect numerous environmental resources through potential impacts related to future air temperatures and precipitation patterns. Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21st century than were observed during the 20th century. Each of the past three decades has been warmer than all the previous decades in the instrumental record, and the decade from 2000 through 2010 has been the warmest. The observed global mean surface temperature (GMST) from 2011 to 2020 was approximately 0.82°C higher than the average GMST for the 20th century (National Oceanic and Atmospheric Administration 2020). Furthermore, several independently analyzed data records of global and regional Land-Surface Air Temperature (LSAT) obtained from station observations jointly indicate that LSAT and sea surface temperatures have increased.

According to *California's Fourth Climate Change Assessment*, statewide temperatures from 1986 to 2016 were approximately 0.6 to 1.1°C higher than those recorded from 1901 to 1960. Potential impacts of climate change in California may include reduced water supply from snowpack, sea level rise, more extreme heat days per year, more large forest fires, and more drought years (State of California 2018). In addition to Statewide projections, *California's Fourth Climate Change Assessment* includes regional reports that summarize climate impacts and adaptation solutions for nine regions of the State and regionally-specific climate change case studies (State of California 2018). However, while there is growing scientific consensus about the possible effects of climate change at global and Statewide levels, current scientific modeling tools are unable to predict what local impacts may occur with a similar degree of accuracy. A summary of some of the potential effects that could be experienced in California as a result of climate change is presented below.

Air Quality

Based on a report by the California Climate Change Center (CCCC), by 2050, California is projected to warm by approximately 2.7°F above 2000 averages and average temperatures could increase by 4.1–8.6°F by 2100, depending on emissions levels (CCCC 2012). Since 1896, the top five warmest years in the Los Angeles region (in terms of annual average temperature) have all occurred since 2012 (State

of California 2018). Higher temperatures are conducive to air pollution formation and rising temperatures could, therefore, result in worsened air quality in California. As a result, climate change may increase the concentration of ground-level ozone (O_3), but the magnitude of the effect, and, therefore, its indirect effects are uncertain. In addition, as temperatures have increased in recent years, the area burned by wildfires throughout the State has increased, and wildfires have occurred at higher elevations in the Sierra Nevada Mountains. In Southern California, the average size of summertime non-Santa Ana wind-based fires have significantly increased from 1,129 hectares in the 1960s to 2,121 hectares in the 2000s (State of California 2018). If higher temperatures continue to be accompanied by an increase in the incidence and extent of large wildfires, air quality could worsen. Severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the State. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains could tend to temporarily clear the air of particulate pollution, which would effectively reduce the number of large wildfires and, thereby, ameliorate the pollution associated with them (California Natural Resources Agency 2009).

Water Supply

Analysis of paleoclimatic data (such as tree-ring reconstructions of stream flow and precipitation) indicates a history of naturally and widely varying hydrologic conditions in California and the west, including a pattern of recurring and extended droughts. Uncertainty remains with respect to the overall impact of climate change on future precipitation trends and water supplies in California. Year-to-year variability in Statewide precipitation levels has increased since 1980, meaning that wet and dry precipitation extremes have become more common (California Department of Water Resources 2018). This trend of increased dry and wet extremes is expected to increase in the future across most of the Los Angeles region (State of California 2018). The uncertainty regarding future precipitation trends complicates the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood. The average early spring snowpack in the western Unites States, including the Sierra Nevada Mountains, decreased by about 10 percent during the last century. During the same period, sea level rose over 0.15 meter along the Central and Southern California coasts (State of California 2018). The Sierra snowpack provides the majority of California's water supply as snow that accumulates during wet winters is released slowly during the dry months of spring and summer. A warmer climate is predicted to reduce the proportion of precipitation that falls as snow and the amount of snowfall at lower elevations, thereby reducing the total snowpack. Projections indicate that average spring snowpack in the Sierra Nevada and other mountain catchments in Central and Northern California will decline by approximately 66 percent from its historical average by 2050 (State of California 2018).

Hydrology and Sea Level Rise

Climate change could affect the intensity and frequency of storms and flooding. The number of atmospheric rivers (regions of high water vapor transport from the tropics to the Pacific Coast that produce intense topographic-induced precipitation along Southern California mountain ranges) is expected to increase in the future, resulting in an extended flood hazard season (State of California 2018). Furthermore, climate change could induce substantial sea level rise in the coming century. Rising sea level increases the likelihood of and risk from coastal flooding. The rate of increase of global mean sea levels between 1993 to 2020, observed by satellites, is approximately 3.6 millimeters per year, more than double the 20th century trend of 1.6 millimeters per year (World Meteorological Organization 2013; National Oceanic and Atmospheric Administration 2023). Sea levels are rising faster now than in the previous two millennia, and the rise will probably accelerate, even with robust

GHG emission control measures. The most recent IPCC report predicts a mean sea level rise of 0.25 to 0.94 meter by 2100 (IPCC 2018). A rise in sea levels could erode 31 to 67 percent of Southern California beaches and cause flooding of approximately 370 miles of coastal highways during 100-year storm events. This would also jeopardize California's water supply due to saltwater intrusion and induce groundwater flooding and/or exposure of buried infrastructure (State of California 2018). Furthermore, increased storm intensity and frequency could affect the ability of flood control facilities, including levees, to handle storm events. In the Los Angeles region, the effects of sea level rise on the coastline is expected to be compounded by the impacts of wave events during coastal storms because much of the coastline is comprised of wide sandy beaches (State of California 2018).

Agriculture

California has an over $50 billion annual agricultural industry ($176 million of which is from Los Angeles County) that produces over a third of the country's vegetables and two-thirds of the country's fruits and nuts (California Department of Food and Agriculture 2021). Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, certain regions of agricultural production could experience water shortages of up to 16 percent, which would increase water demand as hotter conditions lead to the loss of soil moisture. In addition, crop yield could be threatened by water-induced stress and extreme heat waves, and plants may be susceptible to new and changing pest and disease outbreaks (State of California 2018). Temperature increases could also change the time of year certain crops, such as wine grapes, bloom or ripen and, thereby, affect their quality (California Climate Change Center 2006).

Ecosystems and Wildlife

Climate change and the potential resultant changes in weather patterns could have ecological effects on global and local scales. Soil moisture is likely to decline in many regions as a result of higher temperatures, and intense rainstorms are likely to become more frequent. Rising temperatures could have four major impacts on plants and animals: timing of ecological events; geographic distribution and range of species; species composition and the incidence of nonnative species within communities; and ecosystem processes, such as carbon cycling and storage (Parmesan 2006; State of California 2018).

4.7.2 Regulatory Setting

This section describes the federal, State, and local laws, regulations, policies, and case law that are applicable to climate change and GHG emissions. Below are summaries of key regulations that may apply to the Project and are relevant to the analysis of environmental impacts in the following section; however, this discussion is not intended to be exhaustive of the growing body of applicable regulations.

a. Federal Regulations

Federal Clean Air Act

The U.S. Supreme Court determined in *Massachusetts et al. v. Environmental Protection Agency et al.* ([2007] 549 U.S. 497) that the United States Environmental Protection Agency (USEPA) has the authority to regulate motor vehicle GHG emissions under the federal Clean Air Act. The USEPA issued a Final Rule for mandatory reporting of GHG emissions in October 2009. This Final Rule applies to fossil fuel suppliers, industrial gas suppliers, direct GHG emitters, and manufacturers of heavy-duty

and off-road vehicles and vehicle engines and requires annual reporting of emissions. In 2012, the USEPA issued a Final Rule that established the GHG permitting thresholds that determine when Clean Air Act permits under the New Source Review Prevention of Significant Deterioration and Title V Operating Permit programs are required for new and existing industrial facilities.

In *Utility Air Regulatory Group v. Environmental Protection Agency* ([2014] 573 U.S. 302), the U.S. Supreme Court held the USEPA may not treat GHGs as an air pollutant for purposes of determining whether a source can be considered a major source required to obtain a Prevention of Significant Deterioration or Title V permit. The Court also held that Prevention of Significant Deterioration permits otherwise required based on emissions of other pollutants may continue to require limitations on GHG emissions based on the application of best available control technology.

b. State Regulations

California has undertaken initiatives designed to address the effects of GHG emissions and to establish targets and emission reduction strategies for GHGs. California Air Resources Board (CARB) is responsible for the coordination and oversight of State and local air pollution control programs in California. There are numerous regulations aimed at reducing the State's GHG emissions. These initiatives are summarized below.

California Advanced Clean Cars Program

Assembly Bill (AB) 1493 (2002), California's Advanced Clean Cars program (referred to as Pavley), requires CARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, the USEPA granted the waiver of Clean Air Act preemption to California for its GHG emission standards for motor vehicles, beginning with the 2009 model year, which allowed California to implement more stringent vehicle emission standards than those promulgated by the USEPA. Pavley I regulates model years from 2009 to 2016 and Pavley II, now referred to as "LEV (Low Emission Vehicle) III GHG," regulates model years from 2017 to 2025. The Advanced Clean Cars program coordinates the goals of the LEV, Zero Emissions Vehicles (ZEV), and Clean Fuels Outlet programs and would provide major reductions in GHG emissions. By 2025, the rules will be fully implemented, and new automobiles will emit 34 percent fewer GHGs and 75 percent fewer smog-forming emissions from their model year 2016 levels (CARB 2011). The Advanced Clean Cars II regulations were adopted in 2022, imposing the next level of low-emission and zero-emission vehicle standards for model years 2026-2035 that contribute to meeting federal ambient air quality ozone standards and California's carbon neutrality targets (CARB 2025a).

California Global Warming Solutions Act of 2006 (Assembly Bill 32 and Senate Bill 32)

AB 32, the "California Global Warming Solutions Act of 2006," outlines California's major legislative initiative for reducing GHG emissions. AB 32 codifies the statewide goal of reducing GHG emissions to 1990 levels by 2020 and requires CARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHG emissions to meet the 2020 deadline. Additionally, AB 32 requires CARB to adopt regulations to require reporting and verification of statewide GHG emissions. Based on this guidance, CARB approved a 1990 statewide GHG level and 2020 target of 431 million metric tons (MMT) of CO_2e, which was achieved in 2016. CARB approved the Scoping Plan, which included GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among others (CARB 2008). Many of the GHG reduction measures included in the Scoping Plan (e.g.,

Low Carbon Fuel Standard, Advanced Clean Car standards, and Cap-and-Trade Program) have been adopted since the Scoping Plan's approval.

CARB approved the 2013 Scoping Plan update, which defined CARB's climate change priorities for through 2018, set the groundwork to reach post-2020 Statewide goals, and highlighted California's progress toward meeting the "near-term" 2020 GHG emission reduction goals defined in the original Scoping Plan. It also evaluated how to align the State's longer term GHG reduction strategies with other State policy priorities, including those for water, waste, natural resources, clean energy, transportation, and land use (CARB 2014).

Senate Bill (SB) 32 extends the California Global Warming Solutions Act of 2006 by requiring the State to further reduce GHG emissions to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged). CARB adopted the 2017 Scoping Plan, which provided a framework for achieving the 2030 target. The 2017 Scoping Plan relied on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, and implementation of adopted policies and legislation, such as SB 1383 and SB 100 (discussed further below). The 2017 Scoping Plan also put an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan update, the 2017 Scoping Plan did not provide project-level thresholds for land use development. Instead, it recommended that local governments adopt policies and locally appropriate quantitative thresholds consistent with Statewide per capita goals of six metric tons (MT) of CO_2e by 2030 and two MT of CO_2e by 2050 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, sub-regional, or regional level) but not for specific individual projects because they include all emissions sectors in the State (CARB 2017).

Assembly Bill 1279

AB 1279, "The California Climate Crisis Act," declares that the State would achieve net zero GHG emissions as soon as possible, but no later than 2045, and to achieve and maintain net negative GHG emissions thereafter. In addition, the bill states that the State would reduce GHG emissions by 85 percent below 1990 levels no later than 2045.

In response to the passage of AB 1279 and the identification of the 2045 GHG reduction target, CARB published the Final 2022 Climate Change Scoping Plan (CARB 2022). The 2022 Scoping Plan builds upon the framework established by the 2008 Climate Change Scoping Plan and previous updates while identifying new, technologically feasible, cost-effective, and equity-focused path to achieve California's climate target. The 2022 Scoping Plan includes policies to achieve a significant reduction in fossil fuel combustion, further reductions in short-lived climate pollutants, support for sustainable development, increased action on natural and working lands (NWL) to reduce emissions and sequester carbon, and the capture and storage of carbon.

The 2022 Scoping Plan assesses the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan; addresses recent legislation and direction from Governor Newsom; extends and expands upon these earlier plans; and implements a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045, as well as taking an additional step of adding carbon neutrality as a science-based guide for California's climate work. As stated in the 2022 Scoping Plan, "The plan outlines how carbon neutrality can be achieved by taking bold steps to reduce GHGs to meet the anthropogenic emissions target and by expanding actions to capture and store carbon through the state's NWL and using a variety of mechanical approaches" (CARB 2022). Specifically, the 2022 Scoping Plan:

- Identifies a path to keep California on track to meet its SB 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030.
- Identifies a technologically feasible, cost-effective path to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions by 85 percent below 1990 levels.
- Focuses on strategies for reducing California's dependency on petroleum to provide consumers with clean energy options that address climate change, improve air quality, and support economic growth and clean sector jobs.
- Integrates equity and protecting California's most impacted communities as driving principles throughout the document.
- Incorporates the contribution of NWL to the State's GHG emissions, as well as their role in achieving carbon neutrality.
- Relies on the most up-to-date science, including the need to deploy all viable tools to address the existential threat that climate change presents, including carbon capture and sequestration, as well as direct air capture.
- Evaluates the substantial health and economic benefits of taking action.
- Identifies key implementation actions to ensure success.

In addition to reducing emissions from transportation, energy, and industrial sectors, the 2022 Scoping Plan includes emissions and carbon sequestration in NWL and explores how NWL contributes to long-term climate goals. Under the primary Scoping Plan Scenario, California's 2030 emissions are anticipated to be 48 percent below 1990 levels, representing an acceleration of the current SB 32 target. Cap-and-Trade regulation continues to play a large factor in the reduction of near-term emissions for meeting the accelerated 2030 reduction target. Every sector of the economy will need to begin to transition in the 2020s to meet the State's GHG reduction goals and achieve carbon neutrality no later than 2045. The 2022 Scoping Plan approaches decarbonization from two perspectives, managing a phasedown of existing energy sources and technologies, as well as increasing, developing, and deploying alternative clean energy sources and technology.

Senate Bill 375

The Sustainable Communities and Climate Protection Act of 2008 (SB 375) enhances the State's ability to reach AB 32 goals by directing CARB to develop GHG emission reduction targets to be achieved from passenger vehicles for each region to meet by 2020 and by 2035 (CARB 2025b). SB 375 aligns regional transportation planning efforts, regional GHG reduction targets, and affordable housing allocations. Metropolitan Planning Organizations (MPOs) are required to adopt a Sustainable Communities Strategy (SCS), which allocates land uses in the MPO's Regional Transportation Plan (RTP). Qualified projects consistent with an approved SCS or Alternative Planning Strategy (categorized as transit priority projects) can receive incentives to streamline CEQA processing.

In 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. The Southern California Association of Governments (SCAG) was assigned targets of an eight-percent reduction in per capita GHG emissions from passenger vehicles by 2020 and a 19-percent reduction in per capita GHG emissions from passenger vehicles by 2035. In the SCAG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements. On April 4, 2024, SCAG's Regional Council formally adopted the 2024-2050 Regional

Transportation Plan/Sustainable Communities Strategy (2024-2050 RTP/SCS), which meets the requirements of SB 375 (SCAG 2024).

Senate Bill 1383

SB 1383 (Lara, Chapter 395, Statues of 2016) requires CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants. SB 1383 requires the strategy to achieve the following reduction targets by 2030:

- CH4 – 40 percent below 2013 levels
- HFCs – 40 percent below 2013 levels
- Anthropogenic black carbon – 50 percent below 2013 levels

As a result, CARB adopted the Short-Lived Climate Pollutant Reduction Strategy in March 2017 and has initiated implementation. SB 1383 also requires the California Department of Resources Recycling and Recovery (CalRecycle), in consultation with CARB, to adopt regulations that achieve specified targets for reducing organic waste in landfills. CalRecycle has initiated the rulemaking process for these regulations with the proposed regulation text submitted to the Office of Administrative Law in October 2020. These regulations were approved and took effect statewide on January 1, 2022 (CalRecycle 2022).

Senate Bill 100

SB 100 (2018) supports the reduction of GHG emissions from the electricity sector by accelerating the State's Renewables Portfolio Standard (RPS) Program. SB 100 requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by the end of 2020[2], 60 percent by the end of 2030, and 100 percent by the end of 2045.

Executive Order B-55-18

Executive Order (EO) B-55-18 established a new Statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter. This goal is in addition to the existing Statewide GHG reduction targets established by SB 375, SB 32, SB 1383, and SB 100.

Executive Order N-79-20

EO N-79-20 established the following new Statewide goals:

- All new passenger cars and trucks sold in-State to be zero-emission by 2035;
- All medium- and heavy-duty vehicles in the State to be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks; and
- All off-road vehicles and equipment to be zero-emission by 2035 where feasible.

EO N-79-20 directs CARB, the Governor's Office of Business and Economic Development, the California Energy Commission (CEC), the California Department of Transportation, and other state agencies to take steps toward drafting regulations and strategies and leveraging agency resources toward achieving these goals.

[2] 34.5 percent of California's retail electricity sales were served by renewable energy resources in 2020, exceeding the State's 2020 RPS goal of 33 percent.

Clean Energy, Jobs, and Affordability Act of 2022 (Senate Bill 1020)

SB 1020 creates clean electricity targets for eligible renewable energy resources and zero-carbon resources to supply 90 percent of retail sale electricity by the end of 2035, 95 percent by the end of 2040, 100 percent by the end of 2045, and 100 percent of electricity procured to serve all State agencies by the end of 2035. This bill prohibited increased carbon emissions elsewhere in the western grid, as well as resource shuffling.[3]

California Building Standards Code

The California Code of Regulations (CCR) Title 24 is referred to as the California Building Standards Code. It consists of a compilation of several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility for persons with physical and sensory disabilities. The current iteration is the 2022 Title 24 standards. The California Building Standards Code's energy-efficiency and green building standards are outlined below.

Part 6 – Building Energy Efficiency Standards/Energy Code

CCR Title 24, Part 6 is the Building Energy Efficiency Standards or California Energy Code. This code establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy demand. New construction and major renovations must demonstrate their compliance with the current Energy Code through submittal and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC. The 2022 Title 24 standards are the applicable building energy efficiency standards for the proposed project because they became effective on January 1, 2023.

Part 11 – California Green Building Standards

The California Green Building Standards Code, referred to as the CALGreen Code, was added to Title 24 as Part 11, first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 California Building Standards Code). The 2019 CALGreen Code included mandatory minimum environmental performance standards for all ground-up new construction of residential and non-residential structures. It also included voluntary tiers (Tiers I and II) with stricter environmental performance standards for these same categories of residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory CALGreen Code standards and may adopt additional amendments for stricter requirements. The 2022 CALGreen Code mandatory standards are more stringent and build upon the 2019 standards, with the following significant changes:

- EV charging requirements for multifamily buildings, hotels, and motels were combined and instead separated projects with less than 20 units from projects with 20 or more units.
  - Smaller projects (less than 20 units) are required to have only EV-capable spaces and EV-ready spaces with electrical receptacles for EV charging.
  - Larger projects (20 or more units) are required to have both EV-capable spaces and EV-ready spaces but are also required to include Level 2 EV chargers. A new requirement was also added for large projects to have EV chargers for five percent of the total number of parking spaces.

[3] 17 Cal. Code Regs. § 95802(a) defines "resource shuffling" as any plan, scheme, or artifice to receive credit based on emissions reductions that have not occurred, involving the delivery of electricity to the California grid.

- Twenty-five percent of the total number of parking spaces are now required to be EV-ready and be equipped with an electrical receptacle that allows an EV driver to charge their vehicle with a portable charger.
- EV charging capability for some alterations to existing parking facilities or addition of new parking facilities for existing multifamily residential buildings are now required and include requirements for EV-capable spaces capable of supporting future Level 2 EVSE.

The 2022 CALGreen voluntary standards include the following significant changes associated with EV charging requirements:

- **Tier I**: require 35 percent of the total parking spaces to be EV-ready with receptacles for EV charging. In projects with 20 or more units, 10 percent of the total number of parking spaces are required to have EV chargers.
- **Tier II:** require 40 percent of the total number of parking spaces to be EV-ready, and for projects with 20 or more units, 15 percent of the total parking spaces are required to have chargers installed.

California Integrated Waste Management Act (Assembly Bill 341)

The California Integrated Waste Management Act of 1989, as modified by AB 341 in 2011, requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows (1) diversion of 25 percent of all solid waste by January 1, 1995 through source reduction, recycling, and composting activities and (2) diversion of 50 percent of all solid.

c. Regional Regulations

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) is principally responsible for comprehensive air pollution control in the South Coast Air Basin (SCAB), which includes Los Angeles, Orange, and the urbanized portions of Riverside and San Bernardino Counties, including the Plan Area. SCAQMD works directly with SCAG, County transportation commissions, and local governments and cooperates actively with all federal and State government agencies to regulate air quality. SCAQMD adopted a "Policy on Global Warming and Stratospheric Ozone Depletion" on April 6, 1990. The policy commits the SCAQMD to consider global impacts in rulemaking and in drafting revisions to the AQMP. In March 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy.

SCAQMD released draft guidance regarding interim CEQA GHG significance thresholds. SCAQMD proposed the use of a percent emission reduction target (e.g., 30 percent) to determine significance for commercial/residential projects that emit greater than 3,000 metric tons per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where SCAQMD is the lead agency. However, SCAQMD has yet to adopt a GHG significance threshold for land use development or transportation projects and has formed a GHG CEQA Significance Threshold Working Group to further evaluate potential GHG significance thresholds.

The GHG CEQA Significance Threshold Working Group is tasked with providing guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members of the working group included government agencies implementing CEQA and representatives from various

stakeholder groups that will provide input to the SCAQMD staff on developing CEQA GHG significance thresholds. The Working Group discussed multiple methodologies for determining project significance. These methodologies included categorical exemptions, consistency with regional GHG budgets in approved plans, a numerical threshold, performance standards, and emissions offsets. The GHG CEQA Significance Threshold Working Group has not convened since 2008.

Southern California Association of Governments 2024-2050 RTP/SCS

On April 4, 2024, SCAG's Regional Council adopted 2024-2050 RTP/SCS. The 2024-2050 RTP/SCS builds upon the progress made through implementation of the 2016-2040 RTP/SCS and the 2020-2045 RTP/SCS and includes goals focused on promoting economic prosperity, improving mobility, protecting the environment, and supporting healthy/complete communities. The SCS implementation strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. The SCS establishes a land use vision of center focused placemaking, concentrating growth in and near Priority Growth Areas, transferring of development rights, urban greening, creating greenbelts and community separators, and implementing regional advance mitigation (SCAG 2024).

The SCS technical report of the 2024-2050 RTP/SCS demonstrates the region's ability to attain and exceed the GHG emission reduction targets set forth by CARB and outlines the region's plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The regional vision of the 2024-2050 RTP/SCS maximizes current voluntary local efforts that support the goals of SB 375. The 2024-2050 RTP/SCS emphasizes new housing and job growth in transit priority areas, livable corridors, high-quality transit areas, and neighborhood mobility areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development (TOD). This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures.

SCAG's SCS provides specific strategies and tools for successful implementation. These include supporting projects that provide diverse housing choices, focusing growth near destinations and mobility options, leveraging technology innovations, such as bike sharing and neighborhood electric vehicles, implementing congestion pricing, improvements to pedestrian infrastructure, and more.

d. Local Regulations

Burbank2035 General Plan

The Burbank2035 General Plan was adopted in February 2013 and serves as a guide to allocating resources and determining future development in the City. The General Plan provides goals and policies related to GHG reductions in the Air Quality and Climate Change Element. The specific goals and policies aimed at reducing greenhouse gas emissions in the City[4] include the following:

[4] Goals and policies from the Burbank2035 General Plan are primarily intended to guide decision-making by the City and is generally intended for implementation by the City rather than by any individual project.

Goal 1: Reduction of Air Pollution

Policy 1.5 Require projects that generate potentially significant levels of air pollutants, such as landfill operations or large construction projects, to incorporate best available air quality and greenhouse gas mitigation in project design.

Goal 3: Reduction of Greenhouse Gas Emissions

Policy 3.4 Reduce greenhouse gas emissions from new development by promoting water conservation and recycling; promoting development that is compact, mixed-use, pedestrian-friendly, and transit-oriented; promoting energy-efficient building design and site planning; and improving the jobs/housing ratio.

Policy 3.8 Transition all economic sectors, new development, and existing infrastructure and development to low- or zero-carbon energy sources. Encourage implementation and provide incentives for low- or zero-carbon energy sources.

Greenhouse Gas Reduction Plan (2022)

The City of Burbank (hereafter referred to as "City" or "Burbank") City Council adopted the Greenhouse Gas Reduction Plan (GGRP) in 2013 as a stand-alone planning document that accompanied Chapter 2, Air Quality and Climate Change Element of the Burbank2025 General Plan. The 2013 GGRP established a baseline GHG emissions inventory for 2010, forecast emissions for 2020 and 2035, and enabled development streamlining opportunities for discretionary projects under CEQA through 2020. The GGRP Update, which was adopted by City Council in May 2022, builds upon the 2013 GGRP and guides the City toward long-term emission reductions in accordance with the State's goals. Per the GGRP Update, Burbank is committed to an emissions reduction target of 49 percent below 2010 levels by 2030 (SB 32 target year) and reaching a longer-term goal of carbon neutrality by 2045. This target and goal are consistent with Statewide efforts established in the 2017 Scoping Plan to reduce Statewide GHG emissions to 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050. The measures included in the GGRP Update combined with Statewide legislation and initiatives and regional transportation programs will enable the City to meet its emissions reduction target of 40 percent below 1990 levels by 2030 through the contribution of Statewide initiatives along with the measures included in the GGRP Update. The City needs to achieve a reduction of 382,451 MT CO_2e by 2030 to meet its goal. The estimated GHG reductions accounted for in the GGRP Update total 386,243 MT CO_2e by 2030. Specific measures aimed at reducing greenhouse gas emissions in the City[5] include the following:

- **BE-1.1** Electrify 100% of new construction in the City by 2023.
- **EG-1.1** Goal to achieve 100% GHG-neutral electricity generation by 2040.
- **T-2.1** Continue Transportation Management Organization (TMO) Expansion, reaching 60% of employees by 2030 and 90% by 2045
- **T-3.1** Increase zero-emission vehicle adoption to 23% of all passenger vehicles by 2030 and 100% by 2045
- **T-4.1** Implement Parking Management as identified in the Burbank2035 General Plan Mobility Element and the City Council's Six Parking Management Principles.

[5] Measures from the Burbank Greenhouse Gas Reduction Plan are primarily intended to guide decision-making by the City and is generally intended for implementation by the City rather than by any individual project.

- **W-1.1** Reduce per capita water consumption from current levels of 132 GPCD (gallons per capita per day) to 124 GPCD by 2030 (a 6.1% reduction) and to 120.5 GPCD by 2045 (an 8.7% reduction).
- **SW-1.1** Meet SB 1383 organics and recycling requirements, reducing organic waste disposal 75% by 2025.

4.7.3 Impact Analysis

a. Thresholds of Significance

For the purposes of this environmental analysis, thresholds of significance are based on the questions in Appendix G of the *CEQA Guidelines*, which states that impacts related to GHG emissions would be potentially significant if implementation of the proposed Project would do any of the following:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment
2. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases

The majority of individual projects do not generate sufficient GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (*CEQA Guidelines* Section 15064[h][1]). Per *CEQA Guidelines* Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with a previously approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. Therefore, *CEQA Guidelines* Section 15064(h)(3) allows a lead agency to make a finding of less than significance for GHG emissions if a project complies with adopted plans, programs, policies, and/or other regulatory strategies to reduce GHG emissions.

Section 15064.4 of the *CEQA Guidelines* recommends that lead agencies quantify the GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project, which include the following: the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHG emissions.

Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold is supported by substantial evidence. See *CEQA Guidelines* Section 15064.7(c). The City of Burbank has not adopted a numerical significance threshold for assessing impacts related to GHG emissions. Neither SCAQMD, Governor's Office of Land Use and Climate Innovation (formerly known as the Governor's Office of Planning and Research), CARB, California Air Pollution Control Officers Association (CAPCOA), nor any other State or applicable regional agency

has adopted a numerical significance threshold for assessing GHG emissions that is applicable to the proposed Project.

In the absence of any adopted or accepted numeric threshold, the significance of the proposed Project's GHG emissions will be evaluated, consistent with *CEQA Guidelines* Sections 15064.4(b) and 15064(h)(3) by considering whether the proposed Project complies with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

Therefore, the significance of the proposed Project's potential impacts regarding GHG emissions and climate change is evaluated based on the threshold of significance established by the City, namely whether a project complies with applicable plans, polices, regulations and requirements adopted to implement a statewide, regional or local plan for the purposes of reducing GHG emissions and mitigating the effects of climate change. For this project, the most applicable adopted regulatory plans to reduce GHG emissions and mitigate the effects of climate change are the 2022 Scoping Plan, SCAG 2024 RTP/SCS, Burbank2035 General Plan, and the Greenhouse Gas Reduction Plan. The potential GHG emissions from the construction and operation of the proposed Project are provided for informational purposes.

b. Methodology

As discussed in the Section 2, *Project Description*, the proposed Project intends to develop 9,702 new residential units, 400 hotel rooms and 3,986,207 square feet of commercial space as part of the proposed Project. However, the emissions modeling assumed for operation of 10,228 residential units, 600 hotel rooms, 8,546,900 square feet of office and retail use, and 55,800 square feet of school use based on the land use data from Fehr and Peers which include cumulative growth from studio entitlements, kindergarten through 12 grade school enrollment, and accessory dwelling units. Emissions estimates using this data set provide a more conservative analysis.

The majority of new residential development are intended to be multi-family residential; however, buildout of the proposed Project may include lower densities. GHG emissions result from both direct and indirect sources during construction and operation of future development projects under the proposed Project. Direct emissions include emissions from fuel combustion in vehicles and natural gas combustion from stationary sources. Indirect emissions include off-site emissions occurring because of electricity and water consumption and solid waste generation.

Mobile Sources

Mobile source emissions were estimated using vehicle activity data presented in Section 4.15, *Transportation*, and vehicle emission rates from CARB's EMFAC2021 model. All residential vehicle miles traveled (VMT) growth and employment VMT growth between the baseline (2023) condition and the future (2035) condition were attributed to the proposed Project. As shown in

Table 4.7-1, project buildout of would result in an increase in vehicle trips and VMT compared to the 2023 baseline year. However, residential VMT per capita and employment VMT per employee would be reduced in comparison to the 2023 baseline VMT.[6]

[6] Note that the Fehr & Peer's Technical Review of Modeling and VMT Methodology for Media District Specific Plan Traffic Study Report (Appendix D) uses citywide data for the baseline conditions and Specific Plan Area data for the future conditions.

Table 4.7-1 Vehicle Activity Data (Daily) for the Future With Project Scenario

Activity	Baseline (Specific Plan Area- 2023)	No Project (Specific Plan Area- 2035)	With Project (Specific Plan Area- 2035)
Residential VMT	130,001	241,167	343,134
Residential Vehicle Trips	15,216	27,968	39,960
Residential VMT per capita	11.4	10.6	10.4
Employment VMT	578,579	835,683	877,548
Employment Vehicle Trips	55,389	77,187	81,128
Employment VMT per Employee	13.9	13.3	12.8

VMT = Vehicle Miles Traveled

Source: Fehr & Peers 2025

Energy Sources

Energy use emissions were calculated according to the methodology explained in the CalEEMod User Guide, Version 2022.1.1.23. The energy use estimates account for the Building Energy Efficiency Standards (Title 24). This is a conservative assumption since the energy use estimates do not account for potential energy efficiency measures required by subsequent Title 24 updates in 2025 and 2028.

Electricity emissions are calculated by multiplying the energy use times the carbon intensity of the utility district per kilowatt hour. Development under the proposed Project would be served by Burbank Water and Power (BWP). Therefore, BWP specific energy intensity factors (i.e., the amount of CO_2, CH_4, and N_2O per kilowatt-hour) are used in the calculations of GHG emissions. To account for the continuing effects of the RPS, the energy intensity factors included in CalEEMod were those forecast for 2035. BWP energy intensity factors used in the analysis are shown in Table 4.7-2.

Table 4.7-2 BWP Energy Intensity Factors

Electricity-Generated GHGs	2035 (lbs./MWh)
Carbon dioxide (CO_2)	233.59
Methane (CH_4)	0.033
Nitrous oxide (N_2O)	0.004

lbs./MWh = pounds per megawatt-hour

Area Sources

Emissions associated with area sources, including consumer products, landscape maintenance, and architectural coating, were calculated in CalEEMod and utilize standard emission rates from CARB, USEPA, and emission factor values provided by the local air district (California Air Pollution Control Officers Association 2017).

Water and Wastewater

Water used and wastewater produced by a project generate indirect GHG emissions. These emissions are a result of the energy used to supply, convey, and treat water and wastewater. In addition to the indirect GHG emissions associated with energy use, the wastewater treatment process itself can directly emit both CH_4 and N_2O. Indoor and outdoor water use was estimated based on average consumption rates from CalEEMod.

Solid Waste

The disposal of solid waste produces GHG emissions from the transportation of waste, anaerobic decomposition in landfills, and incineration. To calculate the GHG emissions generated by solid waste disposal, the total volume of solid waste was calculated using waste disposal rates identified by CalRecycle. The methods for quantifying GHG emissions from solid waste are based on the IPCC method, using the degradable organic content of waste. GHG emissions associated with the Project's waste disposal were calculated using these parameters. The disposal of solid waste produces GHG emissions from the transportation of waste, anaerobic decomposition in landfills, and incineration.

Construction

GHG emissions would also be generated by construction activity. No specific development projects have been proposed as part of the Project; therefore, an annualized quantification of construction emissions would be speculative. In addition, construction-related GHG emissions would be a negligible percentage of total regional emissions when considering the emissions generated by mobile sources. As stated in the 2024-2050 SCAG RTP/SCS Program Environmental Impact Report (PEIR), "generally, due to relatively short-term nature of construction activities of projects as compared to the project's overall lifetimes, the construction emissions are assumed to contribute a relatively small portion of overall lifetime project GHG emissions" (SCAG 2024). Nevertheless, construction emissions are calculated and amortized over 30 years in accordance with SCAQMD recommendations.

The number of new land use development projects anticipated under the proposed Project was used to model GHG emissions generated by construction activities for reasonably foreseeable development. For projects that involve development of land uses that occupy more than 34 acres, CalEEMod extrapolates longer phase duration rather than increasing the estimated amount of equipment and number of workers. As such, proposed Project's emissions estimates were modeled for a project assuming one percent of the land use build out; results were multiplied by a factor of 100. GHG construction emissions were then amortized over 30 years. Refer to Appendix C for more information.

As few vacant sites remain in the City, development accommodated under the proposed Project would result from infill development, which is the replacement of underutilized, low-density development and would likely require demolition and material import/export. CalEEMod does not assume any export of demolition debris or any soil import/export from grading. This analysis conservatively assumes demolition of existing buildings equal to one-half of the floor area of new development. Development of new uses within the City would typically balance grading cut and fill materials on-site to reduce costs; nonetheless, future development projects accommodated under the proposed Project may include sites that require substantial grading to accommodate subterranean parking facilities. This analysis assumes an average cut depth of 10 feet for the area of the building footprint and that 25 percent of the cut soil would be exported. With these factors included, CalEEMod was used to conservatively estimate GHG emissions resulting from future development accommodated under the proposed Project.

c. Project Impacts

Threshold 1:	Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?
Threshold 2:	Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impact GHG-1 THE PROPOSED PROJECT WOULD NOT GENERATE GHG EMISSIONS THAT EITHER DIRECTLY OR INDIRECTLY PRODUCE A SIGNIFICANT IMPACT ON THE ENVIRONMENT. IN ADDITION, THE PROPOSED PROJECT WOULD BE CONSISTENT WITH STATE PLANS TO MEET THE GHG REDUCTION TARGET ESTABLISHED BY SB 32 (STATE SCOPING PLAN), THE 2024-2050 RTP/SCS, THE CITY'S GGRP UPDATE, AND THE BURBANK2035 GENERAL PLAN AIR QUALITY AND CLIMATE CHANGE ELEMENT. THEREFORE, IMPACTS RELATED TO GHG EMISSIONS WOULD BE LESS THAN SIGNIFICANT.

The proposed Project would be consistent with measures and GHG reduction strategies from the State Scoping Plan. The proposed Project would also be consistent with the goals of the 2024-2050 RTP/SCS, the City's GGRP Update, and the Burbank2035 General Plan. The proposed Project's impacts related to GHG emissions would be less than significant.

2022 Scoping Plan (SB 32 Implementation)

The principal State plan to monitor and regulate GHGs is AB 32, the California Global Warming Solutions Act of 2006, which was followed by SB 32. The quantitative goal of AB 32 was to reduce GHG emissions to 1990 levels by 2020. According to CARB, California achieved its 2020 GHG emission reduction target in 2016. The goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. In 2022, the State passed AB 1279, which declares the State would achieve net-zero GHG emissions by 2045 and would reduce GHG emissions by 85 percent below 1990 levels by 2045. The latest iteration of the Scoping Plan is the 2022 Scoping Plan, which focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities. The 2022 Scoping Plan's strategies that apply to the proposed project include the following:

- Reducing fossil fuel use, energy demand, and VMT;
- Building decarbonization; and
- Maximizing recycling and diversion from landfills.

Growth under the proposed Project would be concentrated in locations where a majority of the Burbank Media District Specific Plan Area (hereafter referred to as "Specific Plan Area") is within a Transit Priority Area (TPA) under SCAG's 2024-2050 RTP/SCS. TPA refers to an area within one-half mile of a major transit stop that is existing or planned. The 2022 Scoping Plan Appendix D, Local Actions, provides suggestions (also referred to as "priority area") for prioritizing the various types of mitigation, starting with on-site GHG-reducing design features and mitigation measures, such as methods to reduce VMT and support building decarbonization, access to shared mobility services or transit, and EV charging infrastructure.

The 2022 Scoping Plan's VMT Reduction priority area focuses on projects that are infill sites, located near existing urban uses, do not result in the loss or conversion of natural and working lands (NWL),

and are in proximity to existing transit stops, which are current in use throughout the Specific Plan Area. Future development accommodated by the proposed Project would be infill by nature and would occur within a transit-rich environment. As the Plan Area is currently developed, it would not result in the loss or conversion of NWL. Thus, the proposed Project would not conflict with the VMT Reduction strategy from the 2022 Scoping Plan.

The Specific Plan Area is also located on the southwestern edge of the City and features several major employers and accessible amenities. It encompasses a mix of commercial, office, residential, medical, educational, and open space uses. Development patterns within the Specific Plan Area are compact and highly developed with pedestrian-friendly sections of Riverside Drive and areas north of Alameda Avenue. By nature of the Specific Plan Area, the proposed Project would focus future development in an area with existing transit infrastructure. Thus, the proposed Project would minimize growth in underutilized parts of Burbank, helping to reduce reliance on automotive travel, VMT, and associated emissions (SCAG 2020b).

In addition, development under the proposed Project would be required to comply with the latest Title 24 Building Energy Efficiency Standards (Part 6) and Green Building Standards (Part 11), which would promote building decarbonization and maximizing recycling and would comply with the Scoping Plan's goals to decarbonize the built environment. In addition, the proposed Project is also consistent with other key State GHG reduction strategies. For example, SB 100 (California Renewables Portfolio Standard Program) requires that renewable energy account for 60 percent of retail electricity sales by December 31, 2030. Burbank Water and Power, the local publicly owned utility serving the Specific Plan Area, is required to meet these targets. As such, electricity used in the Specific Plan Area would increasingly be sourced from renewable energy, resulting in indirect GHG reductions that support statewide climate goals.

Furthermore, the proposed Project is consistent with the SB 375 framework and the 2024–2050 RTP/SCS. The RTP/SCS encourages development patterns that reduce GHG emissions from passenger vehicle use through strategies such as transit-oriented development, infill, and higher densities. The proposed Project meets these criteria by concentrating development in an urban area with strong transit access and by avoiding the expansion into undeveloped land. With these features, the proposed Project would not conflict with the 2022 Scoping Plan. Impacts would be less than significant.

GHG Emissions Generation

Development accommodated under the proposed Project would generate GHG emissions through the construction and operation of individual projects. GHG emissions would specifically arise from direct sources, such as motor vehicles, natural gas consumption, solid waste handling/treatment, and indirect sources, such as electricity generation.

Table 4.7-3 presents the estimated emissions associated with the proposed Project. As discussed in Section 2, *Project Description*, the proposed Project would accommodate construction of housing in locations with good access to jobs, services, and high-quality public transit. The increase in housing, hotel, and commercial uses would result in an increase in emissions.

Table 4.7-3 GHG Emissions under the Proposed Project

Source	Forecasted Activity Level Increase (2035)	Forecasted 2035 GHG Emissions ($MTCO_2e$)
Transportation	37.2 Million Residential VMT/year 15.3 Million Employment VMT/year	16,048
Area Sources	–	2,447
Electricity	204 GWh/year[1]	35,009
Natural Gas	248 Million kBTU/year[1]	
Water Supply		3,859
Indoor Water	1,839 Million Gallons/year	
Outdoor Water	30.2 Million Gallons/year	
Solid Waste	16,004 tons	4,996
Refrigerant	2 kg	241
Construction Emissions (Amortized)	–	2,250
Total	**–**	**64,850**

[1] Energy use estimates are conservative. Estimates do not account for energy efficiency measures required by the 2022 Title 24 energy efficiency or potential energy efficiency measures required by subsequent Title 24 updates in 2025 and 2028.

VMT = Vehicle Miles Traveled; GWh = Gigawatt-hours

Source: Refer to Appendix C for modeling results.

SCAG's 2024-2050 RTP/SCS (SB 32 Implementation)

SB 375 requires that each MPO prepare an SCS with the RTP that demonstrates how the region will meet GHG emissions targets. SB 375 establishes a collaborative relationship between MPOs and CARB to establish GHG emissions targets for each region in the State.

SCAG's 2024-2050 RTP/SCS was developed to provide a blueprint to achieve goals within four core categories: mobility, communities, environment and economy. In addition to meeting the GHG reduction targets established by SB 375 and other regional goals, the 2024-2050 RTP/SCS was designed to deliver significant benefits to the region with respect to mobility, safety, health outcomes, travel-time reliability, air quality, economic productivity, environmental justice and transportation asset condition.

The 2024-2050 RTP/SCS integrates land use and transportation strategies to help achieve a coordinated and balanced regional transportation system. As discussed in Section 4.7.2b, *State Regulations*, the 2024-2050 RTP/SCS is a regional plan intended to reduce GHG emission from automobiles and light trucks for the SCAG region to 19 percent below 2005 levels by 2035. The SCS implementation strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. As shown in

Table 4.7-1, the proposed Project would result in a lower per capita VMT compared to baseline 2023 conditions, demonstrating a reduction in VMT relative to population.

The underlying purpose of the proposed Project is to plan for and accommodate requirements with State law and to be consistent with the City's *Burbank2035* General Plan. As discussed in Section 2, *Project Description*, the City is working in partnership with the SCAG to propose updates to the Media District Specific Plan. The existing Specific Plan was adopted in 1991 for the purposes of creating a growth-control plan to ensure that all new development could be accommodated by infrastructure

and public services and to preserve the character of the neighborhoods within the Specific Plan Area. The proposed updates to existing Specific Plan are intended to focus on developing and implementing policies and programs to remove barriers to housing production, streamline the permitting process, and introduce objective design standards for new development within the Specific Plan Area. The City identified groupings of underutilized sites within the Specific Plan Area as opportunities for infill and adaptive reuse. These sites are referred to as opportunity sites and would assist in meeting the City's goals of contextual development, transit-oriented growth, and streamlined housing production. For example, Section 7.2 notes goals for mobility throughout the Plan Area, such as creating a multimodal, active, engaged, human- oriented streetscape network and supporting future development that creates greater access to alternate modes of transportation. Section 9.7 also includes goals for BWP to add new EV charging throughout the Plan Area. These goals would help to reduce GHG upon implementation of the proposed Project as it would reduce reliance on gasoline- or diesel-fueled vehicles in favor of alternate modes of transportation or renewable energy. Therefore, the proposed Project would not conflict with SCAG's 2024-2050 RTP/SCS.

Burbank2035 General Plan

The Burbank2035 General Plan was adopted in February 2013 and serves as a guide to allocating resources and determining future development in the City. The General Plan, especially Air Quality climate Change Element, include goals and policies that are aimed at reducing greenhouse gas emissions. The proposed Project would be consistent with the goals and policies listed in the General Plan and would not interfere with implementation of Goal 1 or Goal 3, *Reduction of Air Pollution* and *Reduction of Greenhouse Gas Emissions*, respectively. This is reflected in the proposed Project through its Sustainability goals to consider sustainability when making land use decisions and Mobility goals to promote greater access to alternate modes of transportation. Thus, future development under the proposed Project would not conflict with the Burbank2035 General Plan and impacts would be less than significant.

Greenhouse Gas Reduction Plan

The City of Burbank adopted the GGRP in 2013 as a stand-alone planning document that accompanied Chapter 2, Air Quality and Climate Change Element of the Burbank2025 General Plan. The GGRP was last updated in 2022. Guided by the framework set forth in the City's Burbank2035 General Plan, the GGRP implements Goal 3 from the Air Quality and Climate Change Element and associated Policies 3.1 and 3.2. Policy 3.1 establishes the target for Burbank to reduce communitywide GHG emissions by at least 15 percent from 2010 baseline levels by 2020, and Policy 3.2 establishes the goal to reduce emissions by at least 30 percent from 2010 baseline levels by 2035. Measures from the Burbank Greenhouse Gas Reduction Plan are generally intended to guide decision-making by the City and are intended for implementation by the City rather than by any individual project. However, the proposed Project does include goals and policies that would contribute to reducing GHG generation in the Plan Area. For example, Section 9.7 of the Specific Plan notes installation of a new electrical substation to help the management of flow of electricity in the Plan Area and installation of additional EV charging stations. In addition, Section 7.2 notes goals for mobility throughout the Plan Area, such as supporting future development that creates greater access to alternate modes of transportation. These goals and policies would contribute to a reduction in GHG upon implementation of the proposed Project. Therefore, as development under the proposed Project would be required to comply with citywide actions and establishes goals and policies aimed at reducing GHG emissions, it would not conflict with the GGRP. Impacts would be less than significant.

Determination

Less than significant impact

4.7.4 Cumulative Impacts

GHG emissions and climate change are, by definition, cumulative impacts. Although GHG emissions have worldwide repercussions, the contribution of the project to cumulative impacts is addressed in light of the goals for reducing statewide emissions. Therefore, the geographic scope for considering cumulative impacts related to GHG emissions is the State of California.

Statewide GHG emissions are an existing significant cumulative impact. As such, the State has established the following statewide emissions reductions targets:

- By 2020, reduce GHG emissions to 1990 levels
- By 2030, reduce GHG emissions to 40 percent below 1990 levels
- By 2045, to achieve carbon neutrality

GHG impacts are assessed in a cumulative context since no single project can cause a discernible change to the climate. Therefore, cumulative significance is based on the same thresholds as the proposed project. In the absence of an adopted numeric threshold for the City of Burbank, the significance of the project's GHG emissions is evaluated on the consistency with applicable plans, policies, regulations, and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. The analysis provided GHG emissions for informational purposes. For this project, the most directly applicable adopted regulatory plans to reduce GHG emissions are the 2022 Scoping Plan, SCAG's 2024-2050 RTP/SCS, the Burbank2035 General Plan, and the GGRP.

As discussed under Impact GHG-1, the proposed project would be consistent with the statewide, regional, and local plans by including energy conservation measures consistent with the latest Title 24 Building Energy Efficiency Standards (Part 6) and Green Building Standards (Part 11) and would comply with the latest iterations of the Title 24 Standards. The Specific Plan Area is within the southwestern edge of the City and encompasses a mix of commercial, office, residential, medical, educational, and open space uses. In addition, it also features several major employers and accessible amenities and there are a number of existing public transit options within the Specific Plan Area, which could potentially reduce VMT per capita. Therefore, the project would promote alternative modes of transportation that would have the effect of reducing VMT and associated mobile GHG emissions.

The proposed Project also has Sustainability goals to consider sustainability when making land use decisions and Mobility goals to promote greater access to alternate modes of transportation. These goals would be consistent with the goals and policies of the Burbank2035 General Plan and as development under the proposed Project would be required to comply with citywide actions, it would not conflict with the GGRP.

The proposed updates to the existing Specific Plan are intended to focus on developing and implementing policies and programs to remove barriers to housing production, streamline the permitting process, and introduce objective design standards for new development within the Specific Plan Area. As such, the proposed Project is consistent with SCAG's 2024-2050 RTP/SCS. As discussed in the impact analysis, the proposed project would be consistent with the 2022 Scoping Plan, SCAG's 2024-2050 RTP/SCS, the Burbank2035 General Plan, and the GGRP. Given the proposed

Project's consistency with Statewide, regional, and local plans adopted for the reduction of GHG emissions, the incremental contribution of future development projects under the proposed Project to GHG emissions and their effects on climate change would not be cumulatively considerable. Accordingly, the proposed Project's cumulative impact on GHG emissions would be less than significant.

4.8 Hazards and Hazardous Materials

This section evaluates potential environmental impacts related to hazards and hazardous materials associated with implementation of the proposed Project. Specifically, this section reviews the proposed Project's impact related to the release of hazardous materials, hazardous emissions or handling within 0.25-mile of schools, hazardous materials cleanup sites, interference with emergency response plans, and the risk of wildland fires. Other thresholds of significance associated with the transport, use or disposal of hazardous materials and airport land use plans are discussed in Section 4.19, *Effects Found Not to be Significant*; therefore, these issues are not studied further herein.

4.8.1 Environmental Setting

a. Hazardous Materials

The term "hazardous material" has different definitions for different regulatory programs. For the purpose of this EIR, the term "hazardous materials" refers to both hazardous materials and hazardous waste. The California Health and Safety Code Section 25501(n)(1) defines a hazardous material as a material that "because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment." Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material that a handler or the administering agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or environment.

A material is hazardous if it exhibits one or more of the following characteristics: toxicity, ignitability, corrosivity, and reactivity. These types of hazardous materials are defined below:

- **Toxic Substances.** Toxic substances may cause short-term or long-lasting health effects, ranging from temporary effects to permanent disability, or death. For example, such substances can cause disorientation, acute allergic reactions, asphyxiation, skin irritation, or other adverse health effects if human exposure exceeds certain levels (the level depends on the substances involved and is chemical-specific). Carcinogens, substances that can cause cancer, are a special class of toxic substances. Examples of toxic substances include benzene (a component of gasoline and suspected carcinogen) and methylene chloride (a common laboratory solvent and a suspected carcinogen).
- **Ignitable Substances.** Ignitable substances are hazardous because of their ability to burn. Gasoline, hexane, and natural gas are examples of ignitable substances.
- **Corrosive Materials.** Corrosive materials can cause severe burns. Corrosives include strong acids and bases, such as sodium hydroxide (lye) or sulfuric acid (battery acid).
- **Reactive Materials.** Reactive materials may cause explosions or generate toxic gases. Explosives, pure sodium or potassium metals (which react violently with water), and cyanides are examples of reactive materials.

Soil and groundwater can become contaminated by hazardous material releases in a variety of ways, including permitted or illicit use and accidental or intentional disposal or spillage. Before the 1980s, most land disposal of chemicals was unregulated, resulting in numerous industrial properties and public landfills becoming dumping grounds for unwanted chemicals. The largest and most contaminated of these sites became Superfund sites, so named for their eligibility to receive cleanup

money from a federal fund established under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The National Priorities List (NPL) is the list of national priorities among the known releases or threatened releases of hazardous substances, pollutants, or contaminants throughout the United States and its territories. The NPL is intended primarily to guide the United States Environmental Protection Agency (USEPA) in determining which sites warrant further investigation. Sites are added to the NPL following a hazard ranking system.

Numerous smaller properties have been designated as contaminated sites. Often these are gas station sites where leaking underground storage tanks (LUSTs) were upgraded under a federal requirement in the late 1980s. Another category of sites that may have some overlap with the types already mentioned is "brownfields" – previously used, often abandoned, sites that due to actual or suspected contamination are undeveloped or underused. Both the USEPA and California Department of Toxic Substances Control (DTSC) maintain lists of known brownfields sites. These sites are often difficult to inventory due to their owners' reluctance to publicly label their property as potentially contaminated.

Asbestos Containing Materials

Asbestos is a naturally occurring fibrous material that was widely used in structures built between 1945 and 1978 for its fireproofing and insulating properties. Asbestos-containing materials (ACM) were banned by USEPA between the early 1970s and 1991 under the authority of the federal Clean Air Act (CAA) and the Toxic Substances Control Act (TSCA) due to their harmful health effects. Exposure to asbestos increases risk of developing lung disease, such as lung cancer, mesothelioma, or asbestosis (USEPA 2017a). Common ACMs include vinyl flooring and associated mastic, wallboard and associate joint compound, plaster, stucco, acoustic ceiling spray, ceiling tiles, heating system components, and roofing materials. Pre-1973 commercial and industrial structures are affected by asbestos regulations if damage occurs, or if remodeling, renovation, or demolition activities disturb ACMs.

Lead and Lead-Based Paint

Lead is a naturally occurring metallic element. Because of its toxic properties, lead is regulated as a hazardous material. Excessive exposure to lead can result in the accumulation of lead in the blood, soft tissues, and bones. Children are particularly susceptible to potential lead-related health problems because it is easily absorbed into developing systems and organs. Lead can affect almost every organ and system in the body. In children, lead can cause behavior and learning problems, lower IQ and hyperactivity, hearing problems, and anemia. In adults, lead can cause cardiovascular effects, decreased kidney function, and reproductive problems. In addition, lead can result in serious effects to the developing fetus and infant for pregnant women (USEPA 2017b). Among its numerous uses and sources, lead can be found in paint, water pipes, solder in plumbing systems, and in soils surrounding buildings and structures that are painted with lead-based paint (LBP). LBP was primarily used during the same time period as ACMs. Pre-1978 commercial and industrial structures are affected by LBP regulations if the paint is in a deteriorated condition or if remodeling, renovation, or demolition activities disturb LBP surfaces.

b. Existing Conditions

Hazardous Materials Sites

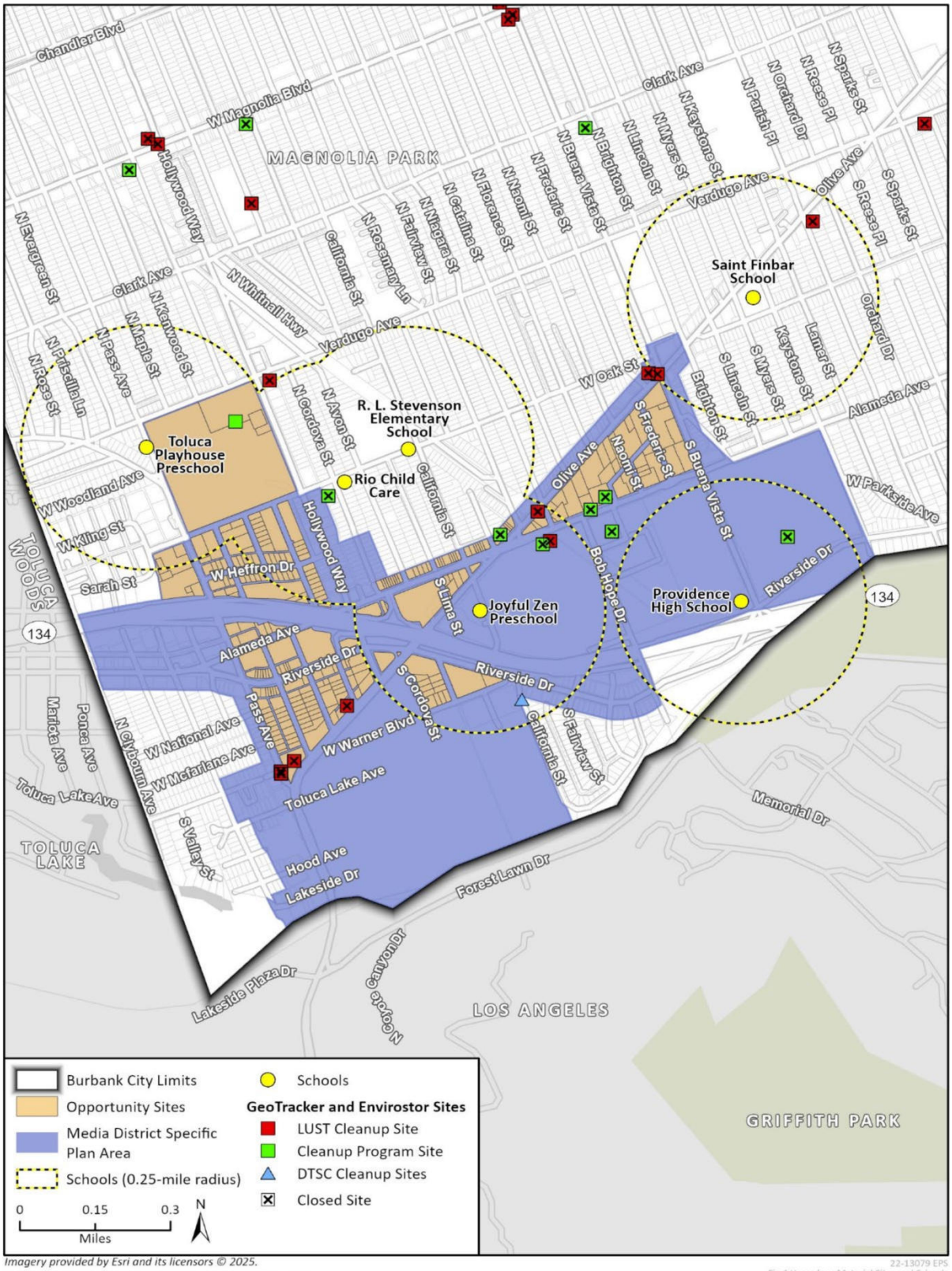
The locations where hazardous materials are used, stored, treated and/or disposed of comes to the attention of regulatory agencies through various means, including licensing and permitting, enforcement actions, and anonymous tips. To the extent possible, the locations of these businesses and operations are recorded in database lists maintained by various State, federal, and local regulatory agencies. In addition, federal, State, and local agencies enforce regulations applicable to hazardous waste generators and users, and the Los Angeles County Fire Department Health Hazardous Materials Division tracks and inspects hazardous materials handlers to ensure appropriate reporting and compliance.

Permitted uses of hazardous materials include those facilities that use hazardous materials or handle hazardous wastes in accordance with current hazardous materials and hazardous waste regulations. The use and handling of hazardous materials from these sites is considered low risk, although there can be instances of unintentional chemical releases. In such cases, the site would be tracked in the environmental databases as an environmental case. Permitted sites without documented releases are, nevertheless, potential sources of hazardous materials in the soil and/or groundwater due to accidental spills, incidental leakage, or spillage that may have gone undetected. Some facilities are permitted for more than one hazardous material use and, therefore, could appear in more than one database.

The potential to encounter hazardous materials in soil and groundwater in the City of Burbank (hereafter referred to as "City" or "Burbank") is generally based on a search of federal, State, and local regulatory databases that identify permitted hazardous materials uses, environmental cases, and spill sites. The DTSC EnviroStor database contains information on properties in California where hazardous substances have been released or where the potential for a release exists. The California State Water Resources Control Board (SWRCB) GeoTracker database contains information on properties in California for sites that require cleanup, such as LUST sites, which may impact, or have potential impacts, to water quality, with emphasis on groundwater.

According to databases of hazardous material sites maintained by the DTSC (EnviroStor) and the SWRCB (GeoTracker), the Specific Plan Area has the following types of hazardous sites that are still active or need further investigation, such as a cleanup site located at 531 North Hollywood Way. The hazardous sites within or near the Burbank Media District Specific Plan Area (hereafter referred to as "Specific Plan Area") are shown in Figure 4.8-1.

Figure 4.8-1 Hazardous Materials Sites and Schools Within the Specific Plan Area



Imagery provided by Esri and its licensors © 2025.
Additional data provided by GeoTracker and Envirostor, 2024.

22-13079 EPS
Fig 4 Hazardous Material Sites and Schools

Use, Transport, and Abatement of Hazardous Materials

The use of hazardous materials is typically associated with industrial land uses. Activities, such as manufacturing, plating, cleaning, refining, and finishing, frequently involve chemicals that are considered hazardous when accidentally released into the environment.

To a lesser extent, hazardous materials may also be used by various commercial enterprises, as well as residential uses. In particular, dry cleaners use cleaning agents considered to be hazardous materials. Hardware stores typically stock paints and solvents, as well as fertilizers, herbicides, and pesticides. Swimming pool supply stores stock acids, algaecides, and caustic agents. Most commercial businesses occasionally use commonly available cleaning supplies that, when used in accordance with manufacturers' recommendations, are considered safe by the State of California but can be considered hazardous when not handled properly. Private residences also use and store commonly available cleaning materials, paints, solvents, swimming pool and spa chemicals, as well as fertilizers, herbicides, and pesticides.

If improperly handled, hazardous materials can result in public health hazards through human contact with contaminated soils or groundwater, or through airborne releases in vapors, fumes, or dust. There is also the potential for accidental or unauthorized releases of hazardous materials that would pose a public health concern. The use, transport, and disposal of hazardous materials and wastes are required to occur in accordance with federal, State, and local regulations. In accordance with such regulations, the transport of hazardous materials and wastes can only occur with transporters who have received training and appropriate licensing. Additionally, hazardous waste transporters are required to complete and carry a hazardous waste manifest, which includes forms, reports, and procedures designed to seamlessly track hazardous waste.

Schools

School locations require consideration because children are particularly sensitive to hazardous materials exposure. Additional protective regulations apply to projects that could use or disturb potentially hazardous products near or at schools. The California Public Resources Code requires projects that would be located within 0.25-mile of a school and might reasonably be expected to emit or handle hazardous materials to consult with the school district regarding potential hazards. Burbank Unified School District (BUSD) operates 22 schools in the City, including 11 elementary schools, three middle schools, three high schools, and five alternative schools (BUSD 2022). As shown in Figure 4.8-1, there are three schools within the Specific Plan Area; Providence High School, Joyful Zen Preschool and Toluca Playhouse Preschool, and three schools within 0.25-mile of the Specific Plan Area; R. L. Stevenson Elementary School, Saint Finbar School, and Rio Childcare.

Emergency Routes and Wildland Fires

Wildland fires are uncontrolled fires that burn in natural, undeveloped areas, which pose significant risks to life, property, and the environment. Wildfire hazards are assessed and provided to the public as a resource for understanding the vulnerability of their region through the CAL FIRE Fire Hazard Severity Zone map, which depicts moderate, high, and very high fire hazard severity zones throughout California (refer to Figure 4.18-1 in Section 4.18, *Wildfire*). The southern portion of the Specific Plan Area is located within a Very High Fire Hazard Severity Zone. To prepare for potential wildland fires in the City, the Burbank2035 Safety Element provides several emergency access and evacuation routes, including:

- Glenoaks Boulevard
- San Fernando Boulevard
- Burbank Boulevard
- Victory Boulevard
- West Olive Avenue
- State Route (SR)-134 Freeway

The nearest evacuation routes to the Specific Plan Area are West Olive Avenue and SR-134 freeway, which cuts through the center of the Specific Plan Area. Additional information regarding emergency evacuation and wildfire hazards are discussed further in Section 4.18, *Wildfire*.

4.8.2 Regulatory Setting

Hazardous materials and waste can pose a potential hazard to human health and the environment when improperly treated, stored, transported, disposed of, or otherwise managed. Federal, State, and local programs that regulate the use, storage, and transportation of hazardous materials and hazardous waste are in place to prevent unwanted consequences. These regulatory programs are designed to reduce the risk that hazardous substances may pose to people and businesses under normal daily circumstances and as a result emergencies and disasters.

a. Federal Regulations

Primary federal agencies with responsibility for hazardous materials management include the USEPA, U.S. Department of Labor's Occupational Safety and Health Administration (OSHA), and U.S. Department of Transportation (USDOT). The major federal laws enforced by these agencies are described below.

Comprehensive Environmental Response, Compensation, and Liability Act

Enacted in 1980, CERCLA, commonly known as Superfund, creates a tax on the chemical and petroleum industries and provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. The tax goes into a trust fund for cleaning up abandoned or uncontrolled hazardous waste sites. A summary of CERCLA is as follows:

- Establishes prohibitions and requirements concerning closed and abandoned hazardous waste sites;
- Provides for liability of persons responsible for releases of hazardous waste at these sites; and
- Establishes a trust fund to provide for cleanup when no responsible party could be identified.

CERCLA also established the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS). The CERCLIS database was renamed to Standardized Emergency Management System (SEMS) by USEPA in 2015. SEMS is the USEPA's system for tracking potential hazardous-waste sites within the Superfund program. In addition, CERCLA authorizes two kinds of response actions:

- Short-term removals, where actions may be taken to address releases or threatened releases requiring prompt response; and

- Long-term remedial response actions that permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances that are serious, but not immediately life threatening. These actions can be conducted only at sites listed on the USEPA's NPL.

CERCLA also enabled the revision of the National Contingency Plan (NCP), which provides guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) of 1976 gives the USEPA the authority to control hazardous waste from "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid wastes. The 1986 amendments to RCRA enabled USEPA to address environmental problems that could result from underground tanks storing petroleum and other hazardous substances.

Toxic Substances Control Act

Congress enacted the TSCA of 1976, codified in Title 15 of the U.S. Code (U.S.C.) and implemented by Title 40 of the Code of Federal Regulations (CFR), to give USEPA the ability to track the 75,000 industrial chemicals currently produced or imported into the United States. USEPA repeatedly screens these chemicals and can require reporting or testing of those that may pose an environmental or human-health hazard. USEPA can ban the manufacture and import of those chemicals that pose an unreasonable risk. More specifically, in California, polychlorinated biphenyls (PCBs) are regulated by both State (Title 22 of the California Code of Regulations [CCR]) and federal (TSCA) rules. TSCA has banned the manufacture, processing, use, and distribution in commerce of PCBs. TSCA gives USEPA the authority to develop, implement and enforce regulations concerning the use, manufacture, cleanup, and disposal of PCBs. TSCA also establishes USEPA's Lead Abatement Program regulations, which provide a framework for lead abatement, risk assessment, and inspections. Those performing these services are required to be trained and certified by USEPA.

U.S. Department of Transportation Regulations

The USDOT prescribes strict regulations for the safe transportation of hazardous materials, including requirements for hazardous waste containers and licensed haulers who transport hazardous waste on public roads. The Secretary of the USDOT receives the authority to regulate the transportation of hazardous materials from the Hazardous Materials Transportation Act (HMTA), as amended and codified in 49 U.S.C. Section 5101 et seq. The Secretary is authorized to issue regulations to implement the requirements of 49 U.S.C. Title 49 of the CFR, which contains the regulations set forth by the Hazardous Materials Transportation Act of 1975, specifies additional requirements and regulations with respect to the transport of hazardous materials. Title 49 of the CFR requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Drivers are also required to be trained in function and commodity-specific requirements.

The Pipeline and Hazardous Materials Safety Administration (PHMSA), formerly the Research and Special Provisions Administration, was delegated the responsibility to write the hazardous materials regulations, which are contained in Title 49 of the CFR Parts 100-180. Title 49 of the CFR, which

contains the regulations set forth by the HMTA, specifies requirements and regulations with respect to the transport of hazardous materials. It requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Under the HMTA, the Secretary "may authorize any officer, employee, or agent to enter upon, inspect, and examine, at reasonable times and in a reasonable manner, the records and properties of persons to the extent such records and properties relate to: (1) the manufacture, fabrication, marking, maintenance, reconditioning, repair, testing, or distribution of packages or containers for use by any "person" in the transportation of hazardous materials in commerce; or (2) the transportation or shipment by any "person" of hazardous materials in commerce."

Occupational Safety and Health Act of 1970

The U.S. Department of Labor's Occupational Safety and Health Act was created to assure safe and healthful working conditions by setting and enforcing standards and by providing training, outreach, education, and assistance. OSHA provides standards for general industry and construction industry on hazardous waste operations and emergency response. The Occupational Safety and Health Act, which is implemented by the Occupational Safety and Health Administration (OSHA), contains provisions with respect to hazardous materials handling. Federal Occupational Safety and Health Act requirements, as set forth in Title 29 of the CFR Section 1910, et. seq., are designed to promote worker safety, worker training, and a worker's right-to-know. OSHA has delegated the authority to administer OSHA regulations to the State of California.

Pipeline and Special Provisions Administration

The Pipeline and Hazardous Materials Safety Administration (PHMSA), formerly the Research and Special Provisions Administration, regulations cover definition and classification of hazardous materials, communication of hazards to workers and the public, packaging and labeling requirements, operational rules for shippers, and training. These regulations apply to hazardous waste shipments and interstate, intrastate, and foreign commerce by air, rail, ships, and motor vehicles. The Federal Highway Administration (FHWA) is responsible for highway routing of hazardous materials and highway safety permits. The hazardous materials regulations include emergency response provisions, such as incident reporting requirements. Reports of major incidents go to the National Response Center, which in turn is linked with CHEMTREC, a service of the chemical manufacturing industry that provides details on most chemicals shipped in the United States.

Other Hazardous Materials Regulations

In addition to the USDOT regulations for the safe transportation of hazardous materials, there are other applicable federal laws that also address hazardous materials:

- Community Environmental Response Facilitation Act (CERFA) of 1992
- Clean Water Act
- Clean Air Act
- Safe Drinking Water Act
- Atomic Energy Act
- Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)

b. State Regulations

The primary State agencies with jurisdiction over hazardous chemical materials management within the Specific Plan Area are the California Environmental Protection Agency's (CalEPA) DTSC and the Los Angeles Regional Water Quality Control Board (LARWQCB). Other State agencies involved in hazardous materials management include California OSHA (Cal/OSHA) and the State Office of Emergency Services (CalOES).

Authority for statewide administration and enforcement of RCRA rests with DTSC. While DTSC has primary State responsibility in regulating the generation, storage, and disposal of hazardous materials, DTSC may further delegate enforcement authority to local jurisdictions. In addition, DTSC is responsible and/or provides oversight for contamination cleanup and administers statewide hazardous waste reduction programs. DTSC operates programs to accomplish the following: (1) prevent releases of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly; (2) evaluate soil, water, and air samples taken at sites; and (3) manage the aftermath of improper hazardous waste management by overseeing site cleanups.

The storage of hazardous materials in USTs is regulated by the SWRCB, which delegates authority to the Regional Water Quality Control Board (RWQCB) on the regional level, and typically to the local fire department on the local level.

The CalOES Hazardous Materials (HazMat) Section under the CalOES Fire and Rescue Division coordinates statewide implementation of hazardous materials accident prevention and emergency response programs for all types of hazardous materials incidents and threats. In response to any hazardous materials emergency, the HazMat Section staff is called upon to provide state and local emergency managers with emergency coordination and technical assistance.

California Occupational Safety and Health Act – California Labor Code, Section 6300 et seq.

The California Occupational Safety and Health Act of 1973 addresses California employee working conditions, enables the enforcement of workplace standards, and provides for advancements in the field of occupational health and safety. The Act also created Cal/OSHA, the primary agency responsible for worker safety in the handling and use of chemicals in the workplace.

The Cal/OSHA program is administered and enforced by the Division of Occupational Safety and Health (DOSH). The Cal/OSHA program is similar to the federal OSHA program, as both programs contain rules and procedures related to exposure to hazardous materials during demolition and construction activities. However, Cal/OSHA's standards are generally more stringent than federal regulations. Under the former, the employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure. Under CCR Title 8 Section 1532.1, construction workers (and by extension, neighboring properties) may not be exposed to lead at concentrations greater than 50 micrograms per cubic meter of air averaged over an eight-hour period and exposure must be reduced to lower concentrations if the workday exceeds eight hours. Similarly, CCR Title 8 Section 1529 sets requirements during construction work for asbestos exposure assessments and monitoring, methods of complying with exposure requirements, safety wear, communication of hazards, and medical examination of workers. The regulations specify requirements for employee training, availability of safety equipment, accident-prevention programs, and hazardous substance exposure warnings. At sites known or suspected to be contaminated by hazardous materials, workers must have training in hazardous materials operations and a Site Health and Safety Plan must be prepared. The Health and Safety Plan establishes policies and procedures to protect workers and the

public from exposure to potential hazards at the contaminated site. In addition, Cal/OSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program (IIPP). An IIPP is an employee safety program for potential workplace hazards, including those associated with hazardous materials.

California Code of Regulations, Title 22, Hazardous Waste Management

At the State level, under Title 22, Division 4.5 of the CCR, DTSC regulates hazardous waste in California primarily under the authority of the federal RCRA and the California Health and Safety Code (HSC). The California Hazardous Waste Control Law (HWCL) (codified in HSC, Division 20, Chapter 6.5), and its implementing regulations (Title 22, Division 4.5 of the CCR), establishes regulations that are similar to RCRA but more stringent in their application and empowers DTSC to administer the State's hazardous waste program and implement the federal program in California. DTSC is responsible for permitting, inspecting, ensuring compliance, and imposing corrective action programs to ensure that entities that generate, store, transport, treat, or dispose of potentially hazardous materials and waste comply with federal and State laws. DTSC defines hazardous waste as waste with a chemical composition or other properties that make it capable of causing illness, death, or some other harm to humans and other life forms when mismanaged or released into the environment.

DTSC shares responsibility for enforcement and implementation of hazardous waste control laws with the SWRCB and, at the local level, the RWQCB, and city and county governments.

California Code of Regulations Title 23, Chapter 15 Discharges of Hazardous Waste to Land Section 2511(b)

CCR Title 23, Division 3, Chapter 15 Discharges of Hazardous Waste to Land pertains to water quality aspects of waste discharge to land. The regulations establish waste and site classifications as well as waste management requirements for waste treatment, storage, or disposal in landfills, surface impoundments, waste piles, and land treatment facilities. Requirements are minimum standards for proper management of each waste category, which allows Regional Water Boards to impose more stringent requirements to accommodate regional and site-specific conditions. In addition, these regulations apply to cleanup and abatement actions for unregulated hazardous waste discharges to land (e.g., spills).

License to Transport Hazardous Materials – California Vehicle Code, Section 32000.5 et seq.

The California Department of Transportation (Caltrans) regulates hazardous materials transportation on all interstate roads. Within California, the State agencies with primary responsibility for enforcing federal and State regulations and for responding to transportation emergencies are the California Highway Patrol and Caltrans. Together, federal and State agencies determine driver-training requirements, load labeling procedures, and container specifications for vehicles transporting hazardous materials.

California Fire Code, Title 24, Part 9

The 2022 California Fire Code, written by the California Building Standards Commission, is based on the 2021 International Fire Code (IFC). The IFC is a model code that regulates minimum fire safety requirements for new and existing buildings, facilities, storage, and processes. The IFC addresses fire

prevention, fire protection, life safety, and safe storage and use of hazardous materials in new and existing buildings, facilities, and processes.

c. Regional Regulations

South Coast Air Quality Management District Rule 1403

South Coast Air Quality Management District (SCAQMD) Rule 1403 establishes asbestos survey requirements, notification, and work practice requirements to prevent asbestos emissions from emanating during building renovation and demolition activities. Rule 1403 incorporates the requirements of the federal asbestos requirements found in the National Emission Standards for Hazardous Air Pollutants (NESHAP) found in CFR Title 40, Part 61, Subpart M. USEPA has delegated SCAQMD the authority to enforce the federal asbestos NESHAP, and SCAQMD is the local enforcement authority for asbestos.

d. Local Regulations

In Burbank, the local Certified Unified Program Agency (CUPA) is Los Angeles County CUPA, which is managed by the Los Angeles County Fire Department Health Hazardous Materials Division (HHMD). The City of Burbank Fire Department oversees UST and piping removal per the Burbank Municipal Code (BMC). Additionally, under BMC Title 9, Chapter 1, the City's Fire Code Official is responsible for administering and enforcing Chapter 6.95 of Division 20 of the HSC relating to Hazardous Materials Release Response Plans and Inventory.

Health Risk Assessment Regulatory Oversight Guidelines

Regulatory agencies, such as the USEPA, DTSC, and Office of Environmental Health Hazard Assessment (OEHHA), set forth guidelines that list concentration thresholds over which contaminants may pose a risk to human health. The USEPA combines current toxicity values of contaminants with exposure factors to estimate concentrations of contaminants that may pose a risk to human health. The concentrations set forth by the USEPA are termed Regional Screening Levels (RSL) for various pollutants in soil, air, and tap water. RSL concentrations can be used to screen pollutants in environmental media, trigger further investigation, and provide an initial cleanup goal. RSLs for soil contamination have been developed for both industrial and residential land uses. Residential RSLs are more conservative than industrial RSLs and take into account the possibility of the contaminated environmental media coming into contact with sensitive receptor sites, such as childcare facilities and schools. RSLs consider exposure to pollutants by means of ingestion, dermal contact, and inhalation.

Groundwater Regulatory Oversight Toxicity Criteria and Risk Assessment Procedures

The DTSC has set forth Screening Level (DTSC-SLs) for select contaminants in soil, indoor air, and tap water based on values calculated using Cal-EPA toxicity criteria and risk assessment procedures. While the majority of the DTSC-SLs reflect RSL values, some values are more conservative (DTSC 2025b). Both the USEPA and the California Department of Health Services (DHS) promulgate regulations with respect to the concentration of various chemicals in drinking water. The DHS thresholds for drinking water are generally stricter than those set by the USEPA. Primary maximum contaminant levels (CalMCLs) are established for a number of chemical and radioactive contaminants (Title 22, Division 4, Chapter 15, CCR) in groundwater. CalMCLs are often used by regulatory agencies to determine

cleanup standards when contaminants affect groundwater with beneficial uses or potential beneficial uses, such as drinking water aquifers.

The SWRCB and LARWQCB regulate water quality in California pursuant to statutory requirements set forth in the Porter-Cologne Water Quality Control Act (Cal. Water Code, Section 13000 et seq.), including oversight of water monitoring and contamination cleanup and abatement.

Burbank2035 General Plan Safety Element

The following goals, objectives, and policies from the General Plan Safety Element are applicable to the proposed Project and relate to hazardous materials:

Goal 4: Fire Protection. Burbank provides high-quality fire protection services to residents and visitors. Threats to public safety are reduced and property is protected from wildland and urban fire hazards.

- **Policy 4.3:** Implement fire prevention and suppression programs in the Very High Fire Hazard Severity Zone.
- **Policy 4.4:** Maintain adequate fire breaks in areas within and adjacent to areas of the Very High Fire Hazard Severity Zone.
- **Policy 4.6:** Increase the resilience of existing development in high-hazard areas built prior to modern fire safety codes or wildfire hazard mitigation guidance.
- **Policy 4.7:** Maintain adequate fire suppression capability in areas of intensifying urban development, as well as areas where urban uses and open spaces mix.
- **Policy 4.9** Ensure that all existing and new residential development located in the Very High Fire Hazard Severity Zone and High Fire Hazard Severity Zone, has at least two emergency evacuation routes as well as adequate evacuation access (ingress and egress).
- **Policy 4.12:** Increase the resilience of new development in Very High Fire Severity Zones in compliance with the Board of Forestry and Fire Protection Fire Safe Regulations, California Building Standards Code, and Burbank Municipal Code. Require all new development to be served by a water system that meets applicable fire flow requirements.
- **Policy 4.15** Ensure that re-development after a large fire complies with the requirements for construction in the Very High Fire Hazard Severity Zones for fire safety.
- **Policy 4.16** Ensure that the planning and design of development in Very High Fire Hazard Severity Zones minimizes wildfire hazards and includes adequate provisions for vegetation management, emergency vehicle access, and firefighting while also complying with current fire codes.
- **Policy 4.17** Require fire protection plans for new development in Very High Fire Hazard Severity Zones.
- **Policy 4.18** Require visible home and street addressing, and signage across the City.
- **Policy 4.19:** The Burbank Police and Fire Departments should routinely assess and project future emergency service needs associated with wildland and urban fire hazards.
- **Policy 4.20:** Burbank Water and Power shall manage and regularly maintain water supply infrastructure so that water pressure is adequate for fire-fighting purposes. Regular maintenance and long term integrity of water supply locations for fire fighting purposes should be identified.

Goal 8: Hazardous Materials: Hazardous materials threats to public health and safety are reduced.

- **Policy 8.1:** Review proposed projects involving the use or storage of hazardous materials.
- **Policy 8.2:** Encourage businesses and organizations that store and use hazardous materials to improve planning and management procedures.
- **Policy 8.3:** Encourage and promote practices that will reduce the use of hazardous materials and the generation of hazardous waste at its source, recycle the remaining hazardous wastes for reuse, and treat those wastes that cannot be reduced at the source or recycled.
- **Policy 8.4:** Maintain a hazardous materials response capability that will adequately handle Burbank's hazardous materials safety needs.
- **Policy 8.5:** Consult with appropriate agencies regarding hazardous materials regulations.
- **Policy 8.6:** Provide the residents of Burbank with information on the proper storage and disposal of hazardous materials and e-waste and encourage the use of City disposal facilities.
- **Policy 8.7:** Include information on soil contamination and storage of hazardous materials in the City's Geographic Information System.
- **Policy 8.8:** Advocate the continued review and mitigation of the effects of operation of natural gas and petroleum pipelines, and other pipelines used to transport hazardous substances.
- **Policy 8.9** Reduce the loss of life, property, and injuries incurred as a result of hazardous materials spills by offering comprehensive spill prevention information to businesses using hazardous materials, public education, and emergency response programs. Focus outreach and emergency response on vulnerable populations.

All-Hazards Mitigation Plan

The City's All-Hazard Mitigation Plan (AHMP) was first adopted by the City Council in 2005 in compliance with federal regulations. The purpose of the AHMP is to integrate hazard mitigation strategies into the City's daily activities and programs. The AHMP is a subset of the Burbank2035 Safety Element; however, in the event of any conflict between the provisions of the AHMP and the provisions of the Safety Element, the provisions of the AHMP take precedence. The AHMP assesses risk from natural disasters, transportation-related accidents and losses, wild land/urban interface fires, terrorism and weapons of mass destruction, utility loss or disruption, water and wastewater disruption, hazardous materials incidents, aviation disasters, information technology loss or disruption, explosions, economic disruption, and other special events. The primary objective of the AHMP is to provide a mitigation plan that reduces the negative impacts of potential future disasters on the City.

Multi-Hazard Functional Plan

The City's Multi-Hazard Functional Plan (MHFP) addresses the City's planned response to extraordinary emergency situations associated with natural disasters, technological incidents, and national security emergencies. The MHFP is a subset of the Burbank2035 Safety Element.

4.8.3 Impact Analysis

a. Thresholds of Significance

Thresholds of significance are based on the questions in Appendix G of the *CEQA Guidelines*. According to CEQA Guidelines Appendix G, impacts related to hazards and hazardous materials would be potentially significant if implementation of the proposed Project would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment.
5. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, the project would result in a safety hazard or excessive noise for people residing or working in the project area.
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Thresholds 2, 3, 4, 6, and 7 are analyzed below.

b. Effects Found Not to be Significant

Thresholds 1 and 5 were determined to have a less than significant impact and, therefore, are discussed under Section 4.19, *Effects Found Not to be Significant* and summarized below.

The Specific Plan Area would accommodate infill residential and commercial development in an urbanized area of the City. Residential uses do not utilize hazardous materials, and therefore pose minimal risk of exposing the public to hazardous materials; however, the introduction of commercial development may result in an incremental increase in the use and generation of hazardous materials. All development projects that handle or use hazardous materials would be required to comply with regulations, standards and guidelines established by the United States Environmental Protection Agency, State, Los Angeles County, and City of Burbank. Therefore, the proposed Project would not directly or indirectly create a significant hazard to the public and impacts would be less than significant.

The Specific Plan Area is not within or near any Airport Influence Area defined by the Los Angeles County Airport Land Use Plan, including the Hollywood Burbank Airport. Therefore, development within the Specific Plan Area would not be at risk of airport-related hazards or excessive noise, and impacts would be less than significant.

c. Methodology

This impact analysis addresses the potential to encounter hazardous substances during future project construction in the Specific Plan Area and the potential to create a significant hazard to the public or the environment resulting from implementation of the proposed Project. The evaluation was performed based on current conditions in the City, information in environmental databases, applicable regulations and guidelines, and future development that may have the potential to introduce hazards. In accordance with *CEQA Guidelines* Section 15125, "a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence" where necessary to provide the most accurate description of the existing conditions. As such, due to the preparation time needed to complete the Draft Specific Plan and Draft EIR, this section utilizes the current 2025 data from the environmental databases. Relationships and proximities of potential future development to schools were also identified.

d. Project Impacts

Threshold 2:	Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Impact HAZ-1 DEMOLITION, CONSTRUCTION, AND OPERATION ACTIVITIES ASSOCIATED WITH DEVELOPMENT ACCOMMODATED BY THE PROPOSED PROJECT MAY RESULT IN THE RELEASE OF POTENTIALLY HAZARDOUS MATERIALS. HOWEVER, COMPLIANCE WITH REGIONAL AND FEDERAL REGULATIONS AND THE CITY'S SAFETY ELEMENT POLICIES WOULD MINIMIZE THE RISK OF RELEASES AND EXPOSURE TO THESE MATERIALS, AND IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The proposed Project would accommodate infill residential and commercial development in an urbanized area of the City. Reasonably foreseeable development under the proposed Project could involve demolition of existing structures. Demolition could result in emission of lead and asbestos. However, LBP and ACM exposure are regulated by Cal/OSHA. Future demolition and construction associated with the proposed Project would require compliance with CCR Title 8 Section 1532.1, which requires testing, monitoring, containment, and disposal of lead-based materials such that occupational exposure levels do not exceed Cal/OSHA standards, as discussed in the Regulatory Setting of this section.

The control of asbestos during demolition or renovation of buildings is regulated under the federal CAA, which requires a thorough inspection for asbestos prior to demolition activities and specifies work practices to control emissions. Compliance with the CCR and federal CAA, which is mandatory, would reduce the potential hazards and risks associated with release of lead and asbestos to a less than significant level. In addition, any development projects under the proposed Project that include demolition or renovation activities would be required to comply with SCAQMD Rule 1403. Building permits would not be issued prior to elimination of asbestos and compliance with all applicable regulations.

During the operation period, residential uses occasionally utilize hazardous materials, such as commonly available cleaning materials, paints, solvents, swimming pool and spa chemicals, as well as fertilizers, herbicides, and pesticides, and thereby could potentially pose risk of exposing the public to hazardous materials. The introduction of new commercial uses may also result in an incremental increase in the use of hazardous materials and/or the generation of hazardous materials. As shown

in Figure 4.8-1, an active cleanup site located at 531 North Hollywood Way is within an opportunity site, and there are closed LUST cleanup sites and closed cleanup sites within the proposed opportunity sites. Future development associated with the proposed Project would comply with the applicable policies and goals of Burbank2035 General Plan as referenced in Section 4.8.2, *Regulatory Setting*. Specifically, Policy 1.5 of the Burbank2035 General Plan Land Use Element requires that new projects are "carefully reviewed and consider non-residential uses with the potential to degrade quality of life." Although, there are closed LUST cleanup sites and closed cleanup sites within the proposed opportunity sites of the Specific Plan Area, future development projects carried out under the proposed Project would be subject to City approval and review prior to construction, and would be required to comply with applicable regulations. As such, the exposure to hazardous materials would be minimal.

Commercial uses associated with the proposed Project would be subject to compliance with the provisions of the CCR, as well as requirements by Cal OSHA and other agencies, to ensure hazardous materials risks to the public are minimized. Additionally, development associated with the proposed Project would adhere to General Plan Safety Element Policies 8.1 through 8.8, which are designed to protect the public and prepare the City in the event of an accidental spill or exposure.

Compliance with the updated Burbank2035 Safety Element policies would minimize risks associated with the accidental release of hazardous materials during operation of the residential and commercial spaces. Additionally, compliance with the requirements of all other appropriate federal, State, and local agencies would minimize the risk of the public's potential exposure to these materials. Therefore, potential impacts to the public or the environment through accidental release or exposure to hazardous materials as a result of implementation of the proposed Project would be less than significant.

Determination

Less than significant impact

Threshold 3:	Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

Impact HAZ-2 DEVELOPMENT ACCOMMODATED BY THE PROPOSED PROJECT COULD POTENTIALLY RESULT IN THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT WITHIN 0.25 MILE OF AN EXISTING OR PROPOSED SCHOOL. HOWEVER, COMPLIANCE WITH EXISTING REGULATIONS WOULD MINIMIZE THE RISK OF EXPOSURE TO THESE SUBSTANCES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

BUSD operates 22 schools in the City, including 11 elementary schools, three middle schools, three high schools, and five alternative schools (BUSD 2022). As shown in Figure 4.8-1, there are three schools within the Specific Plan Area; Providence High School, Joyful Zen Preschool and Toluca Playhouse Preschool, and three schools within 0.25-mile of the Specific Plan Area; R. L. Stevenson Elementary School, and Saint Finbar School, and Rio Childcare.

Implementation of the proposed Project would prioritize future development projects on infill sites in already developed areas of the Specific Plan Area. Because the proposed Project does not directly involve development activities, the quantity of hazardous materials proposed for use by future commercial and industrial developments in the Specific Plan Area cannot be predicted with certainty. However, any future development project under the proposed Project would comply with the policies and goals of Burbank2035 General Plan. Specifically, the Land Use Element requires careful review

and consideration of non-residential uses with the potential to degrade quality of life. Nonetheless, accidental release or combustion of hazardous materials at both existing and new commercial developments in the Specific Plan Area could risk exposure of the schools listed above in the Specific Plan Area and the surrounding community to these substances.

As shown in Figure 4.8-1, schools within or near the Specific Plan Area are located within 0.25-mile of hazardous sites, each of which could emit hazardous air emissions, or handle hazardous or acutely hazardous materials, substances, or waste. In addition, future construction or demolition facilitated by the proposed Project may include the temporary transport, storage, and use of potentially hazardous materials including fuels, paints, lubricating fluids, cleaners, or solvents. Specifically, demolition, grading, and excavation activities associated with future construction may result in emissions and transport of hazardous materials in the vicinity of the schools in the Specific Plan Area. However, adherence to applicable policies regarding emissions and transport of hazardous materials such as the Toxic Substance Control Act, as listed in the Regulatory Setting, would reduce potential impacts to schools.

All businesses that handle or necessitate transportation of hazardous materials are required to comply with the provisions of the City's Fire Code and any additional provisions as required in the California Health and Safety Code Division 20, Chapter 6.95, *Hazardous Materials Release Response Plans and Inventory*.

Compliance with applicable regulations of CalEPA, Cal/OSHA, and DTSC; as well as the provisions of the BMC, would minimize risks associated with exposure of sensitive receptors, including schools, to hazardous materials. With continued implementation of these requirements on all new development in the Specific Plan Area, potential impacts would be less than significant.

Determination

Less than significant impact

Threshold 4:	Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Impact HAZ-3 IMPLEMENTATION OF THE PROPOSED PROJECT COULD ACCOMMODATE DEVELOPMENT ON OR NEAR HAZARDOUS MATERIALS SITES. HOWEVER, COMPLIANCE WITH APPLICABLE REGULATIONS RELATING TO SITE CLEANUP AND IMPLEMENTATION OF MITIGATION MEASURE HAZ-1 WOULD MINIMIZE HAZARDS FROM DEVELOPMENT ON CONTAMINATED SITES. IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

The following databases and listings compiled pursuant to Government Code Section 65962.5 were checked on August 20, 2025, for known hazardous materials contamination in the Specific Plan Area:

- **SWRCB**
  - GeoTracker search for LUST and other cleanup sites
- **DTSC**
  - EnviroStor database for hazardous waste facilities or known contamination sites
  - Cortese list of Hazardous Waste and Substances Sites

As mentioned in the *Environmental Setting*, there are existing sites within the Specific Plan Area that contain, or potentially contain, contaminated or hazardous materials. A full list of these sites and their cleanup status can be reviewed in Appendix F (DTSC 2025a; SWRCB 2025).

An active cleanup site is located at 531 North Hollywood Way and within an opportunity site under the proposed Project. There are additional closed LUST cleanup sites and closed cleanup sites within the opportunity sites (see Figure 4.8-1). It is also possible that USTs in use prior to permitting and record keeping requirements may be present in the Specific Plan Area. If an unidentified UST were uncovered or disturbed during construction activities, it would be removed under permit by the BFD. If such removal would potentially undermine the structural stability of existing structures, foundations, or impact existing utilities, the tank might be closed in place without removal. Tank removal activities could pose both health and safety risks, such as the exposure of workers, tank handling personnel, and the public to tank contents or vapors. Potential risks, if any, posed by USTs would be minimized by managing the tank according to existing standards contained in Division 20, Chapters 6.7 and 6.75 (Underground Storage Tank Program) of the California Health and Safety Code as enforced and monitored by the BFD. Additionally, compliance with applicable regulations as listed in the Regulatory Setting, including California Code of Regulations Title 22, AHMP and MHFP would reduce potential impacts to the public or the environment.

The extent to which groundwater may be affected by an underground tank, if at all, depends on the type of contaminant, the amount released, the duration of the release, and depth to groundwater.

Mitigation Measures

HAZ-1 Property Assessment – Phase I and II ESAs

Prior to the start of construction (demolition or grading) of any future development project under the proposed Project, the project applicant shall retain a qualified environmental professional, as defined by ASTM E-1527, to complete one of the following.

If the project is not listed in Appendix F of this EIR, Department of Toxic Substances Control (DTSC) (GeoTracker) or California State Water Resources Control Board (SWRCB) (EnviroStor) databases, and requires more than five feet of excavation, then the proponent shall retain an environmental consultant, California Professional Geologist (PG) or California Professional Engineer (PE), to prepare a Phase I ESA. Any and all recommended actions included in the Phase I ESA shall be followed. If the Phase I ESA identifies recognized environmental conditions or potential concern areas, a Phase II ESA shall be prepared.

If the project site is currently listed, previously listed, or un-listed with a regulatory closure or no further action letter in Appendix F, DTSC (GeoTracker) or SWRCB (EnviroStor) databases, then the project proponent shall retain a qualified environmental consultant, California Professional Geologist (PG) or California Professional Engineer (PE), to prepare a Phase II ESA to determine whether the soil, groundwater, and/or soil vapor has been impacted at concentrations exceeding regulatory screening levels for commercial/industrial land uses. Any and all recommended actions included in the Phase II ESA shall be followed. This shall include the preparation of a Soil Management Plan (SMP) for Impacted Soils (see below) prior to project construction and/or completion of remediation prior to onsite construction.

The completed ESAs shall be submitted to the lead agency for review and approval prior to issuance of building or grading permits.

SOIL MANAGEMENT PLAN REQUIREMENTS

The SMP, or equivalent document, shall be prepared to address on-site handling and management of impacted soils or other impacted wastes, and reduce hazards to construction workers and offsite receptors during construction. The plan shall be submitted to the lead agency and must establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and prevent off-site migration of contaminants from the site. These measures and practices shall include, but are not limited to:

- Stockpile management including stormwater pollution prevention and the installation of BMPs
- Proper disposal procedures of contaminated materials
- Monitoring and reporting
- A health and safety plan for contractors working at the site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection
- The health and safety plan will also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.

The lead agency shall review and approve the development site SMP for impacted soils prior to demolition and grading (construction).

SOIL REMEDIATION REQUIREMENTS

If soil present within the construction envelope at the development site contains chemicals at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), the project proponent shall retain a qualified environmental consultant (PG or PE), to conduct additional analytical testing and recommend soil disposal recommendations, or consider other remedial engineering controls, as necessary.

The qualified environmental consultant shall utilize the development site analytical results for waste characterization purposes prior to offsite transportation or disposal of potentially impacted soils or other impacted wastes. The qualified environmental consultant shall provide disposal recommendations and arrange for proper disposal of the waste soils or other impacted wastes (as necessary), and/or provide recommendations for remedial engineering controls, if appropriate.

The project applicant shall review and approve the disposal recommendations prior to transportation of waste soils offsite, and review and approve remedial engineering controls, prior to construction.

Remediation of impacted soils and/or implementation of remedial engineering controls may require additional delineation of impacts; additional analytical testing per landfill or recycling facility requirements; soil excavation; and offsite disposal or recycling.

The lead agency shall review and approve the development site disposal recommendations prior to transportation of waste soils offsite and review and approve remedial engineering controls, prior to construction.

Significance After Mitigation

Mitigation Measure HAZ-1 requires that any future development under the proposed Project that requires more than five feet of excavation prepare a Phase I ESA, and a Phase II ESA if environmental concerns are discovered through the Phase I ESA. Additionally, this measure ensures that any potential development site location listed on DTSC or SWRCB databases conduct a Phase II ESA for soil sampling and environmental professional recommendations for remediation, as needed.

If groundwater contamination is identified during the Phase I or II ESA, characterization of the vertical and lateral extent of the contamination and remediation activities would be required by the RWQCB prior to the commencement of any new construction activities that would disturb the subsurface under Mitigation Measure HAZ-1. If contamination exceeds regulatory action levels, the developer would be required to undertake remediation procedures prior to grading and development under the supervision of the RWQCB, depending upon the nature of any identified contamination. Implementation of Mitigation Measure HAZ-1 would reduce potential impacts to a less than significant level.

Furthermore, implementation of Mitigation Measures HAZ-1 would be site-specific; therefore, it is not anticipated that any secondary environmental impacts associated with this measure would occur.

Threshold 6:	Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Impact HAZ-4 **THE PROPOSED PROJECT DOES NOT INCLUDE ANY PROPOSED PHYSICAL CHANGES THAT WOULD INTERFERE OR IMPAIR EMERGENCY RESPONSE OR EVACUATION. ADDITIONALLY, TRAFFIC CREATED BY PROJECT IMPLEMENTATION WOULD NOT INTERFERE WITH AN EVACUATION PLAN. THEREFORE, THE PROPOSED PROJECT WOULD NOT INTERFERE WITH THESE TYPES OF ADOPTED PLANS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.**

With additional population growth that could result from implementation of the proposed Project, plus regional growth, traffic conditions in and around the Specific Plan Area could become more congested (for more discussion of this issue, see Chapter 4.15, *Transportation*). In the event of an accident or natural disaster, this increase in traffic may impede the rate of evacuation for the City's residents. Concurrently, the response times for emergency medical or containment services could also be adversely affected by increased traffic.

However, there are no proposed physical changes, such as roadway construction, that would interfere or impair emergency response or evacuation. The Project would not result in changes to emergency evacuation routes. As discussed in Section 4.15*, Transportation*, development facilitated by the proposed Project would be required to accommodate for transportation demands for future development, as projected population growth could lead to increased congestion during emergency evacuations However, the proposed Project would improve vehicle, pedestrian, and bicycle access and connectivity, through the promotion of transit-oriented growth. As such, future developments would be reviewed by City staff to ensure consistency with all applicable City and State design standards and emergency access requirements and plans to ensure development would not interfere with evacuation routes or impede the effectiveness of evacuation plans. Therefore, impacts related to adopted emergency response plans or emergency evacuation plans would be less than significant.

Determination

Less than significant impact

Threshold 7:	Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Impact HAZ-5 PORTIONS OF THE SPECIFIC PLAN AREA ARE WITHIN A VHFHSZ. HOWEVER, COMPLIANCE WITH BURBANK2035 SAFETY ELEMENT POLICIES AND EXISTING STATE AND LOCAL BUILDING STANDARDS WOULD ENSURE IMPACTS RELATED TO WILDLAND FIRES WOULD BE LESS THAN SIGNIFICANT.

Most of the Specific Plan Area is already developed and built out. Most development carried out under the proposed Project would be infill development and would not occur in areas highly susceptible to wildland fires. However, as discussed in Section4.19, *Effects Found Not to be Significant*, the southern portion of the Specific Plan Area is located in a very high fire hazard severity zone (VHFHSZ) according to the Fire Hazard Severity Zones Map (California Department of Forestry and Fire Protection [CALFIRE] 2025).

However, compliance with Safety Element Policies 4.3, 4.4, 4.6, and 4.7 would reduce wildland fire risks regarding potential development. Additionally, compliance with the required provisions and building standards of the City of Burbank and the most recent CBC would reduce potential impacts related to wildland fires. Any future development projects under the proposed Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

Determination

Less than significant impact

4.8.4 Cumulative Impacts

The geographic extent of cumulative analysis for hazards and hazardous materials is the City of Burbank, particularly areas of anticipated development under the Downtown Burbank Transit Oriented Development (TOD) Specific Plan (a consolidation and update of the North San Fernando Boulevard Master Plan and the Burbank Center Plan) and the Golden State Specific Plan (GSSP), as described in Section 3, *Environmental Setting*. As described in Section 3, *Environmental Setting,* the Downtown TOD Specific Plan would facilitate development of up to 9,944 residential units and 6,083,657 square feet of commercial and business development land uses; and the GSSP would facilitate development of up to 7,205 residential units and 3,149,623 square feet of commercial and business development land uses. Cumulative impacts may occur if impacts of the proposed Project combine with similar impacts of other projects in the cumulative scenario.

Upset and Accident Conditions Involving Hazardous Materials

Impacts related to upsets and accidents involving hazardous materials are also generally site-specific and an accident at one location generally does not increase hazards at another location. Cumulative development could occur on properties listed on hazardous materials sites or involve the demolition of existing structures, which may contain hazardous materials, including LBP and ACMs. All demolition and construction activities for cumulative development within the City would be subject to existing applicable federal and State regulatory requirements, General Plan policies, and BMC requirements, which would reduce impacts associated with release of hazards and hazardous materials, including LBP and ACMs. As described under Impact HAZ-1, building permits would not be issued prior to elimination of asbestos and compliance with all applicable regulations. Development accommodated by the proposed Project and the Specific Plans mentioned above would be expected to increase the

potential for accidents involving hazardous materials and businesses that transport or use hazardous materials throughout the City due to the increase in development associated with these projects occurring within Burbank. Development accommodated by these projects would be subject to the applicable federal, State, and local regulations. Therefore, although Citywide growth could increase the overall potential for accidents involving hazardous materials, impacts related to hazardous material accidents generally are not cumulative in nature. For these reasons, the incremental effect of the proposed Project related to accidents involving hazardous materials would not be cumulatively considerable and cumulative impacts would be less than significant.

Hazardous Materials Near Schools

As discussed above, impacts related to hazards and hazardous materials are generally site-specific and exposure to a hazard at one location generally does not increase hazards at another location. Therefore, although Citywide growth could potentially increase the overall potential for hazardous material emissions or releases to affect schools, such impacts generally are not cumulative in nature. Development accommodated by the proposed Project and the two Specific Plans mentioned above would be required to comply with applicable regulations of CalEPA, Cal/OSHA, and DTSC; as well as the provisions of the BMC, which would minimize risks associated with exposure of sensitive receptors, including schools, to hazardous materials, as described under Impact HAZ-2. Therefore, the incremental effect of the proposed Project related to hazardous materials near schools would not be cumulatively considerable and cumulative impacts would be less than significant.

Hazardous Material Sites

As discussed above, impacts related to hazards and hazardous materials are generally site-specific and exposure to a hazard at one location generally does not increase hazards at another location. Therefore, although Citywide growth could potentially increase the potential for releases of hazardous materials from contaminated sites, such impacts are not cumulative in nature. As discussed under Impact HAZ-3, implementation of the proposed Project could accommodate development on or near hazardous materials sites; however, such impacts would be localized in nature. Compliance with applicable regulations relating to site cleanup and implementation of Mitigation Measure HAZ-1 would minimize hazards from development accommodated by the Specific Plans specified above on contaminated sites. Therefore, compliance with applicable regulations and implementation of Mitigation Measure HAZ-1 would ensure that the incremental effect of the proposed Project related to the release of hazardous material from such sites would not be cumulatively considerable and cumulative impacts would be less than significant.

Emergency Response or Emergency Evacuation Plans

Cumulative development in Burbank would have the potential to cause the impairment of an adopted emergency response plan or emergency evacuation plan due to the temporary obstruction of roads associated with construction activities on or near a designated emergency route. Similar to the proposed Project, future development accommodated by the Specific Plans specified above would be reviewed by City staff to ensure consistency with all applicable City and State design standards and emergency access requirements and plans to ensure cumulative development would not interfere with evacuation routes or impede the effectiveness of evacuation plans. Therefore, compliance with applicable regulations and policies would ensure that the incremental effect of the proposed Project related to the impairment or implementation of emergency response plans would not be cumulatively considerable and cumulative impacts would be less than significant.

Wildland Fires

Cumulative impacts may occur if impacts of the proposed project combine with similar impacts of other projects in the cumulative scenario that could result in similar impacts to wildland fire hazards. The Burbank Rancho Neighborhood is partially within a VHFHSZ and the Burbank Downtown TOD and GSSP are both located within 0.25-mile of a VHFHSZ. Development of cumulative projects occurring within VHFHSZs would be subject to compliance with the CBC and CFC. All proposed construction would be required to meet minimum standards for fire safety. Implementation of these plans and policies, in conjunction with compliance with the CBC and CFC, would minimize potential cumulative impacts with respect to wildland fire hazards. As indicated above, the project would not result in significant wildland fire hazard impacts following conformance with the CBC and CFC requirements. Therefore, the proposed project would not contribute to a cumulatively significant impact. Therefore, the incremental effect of the proposed Project related to wildland fires would not be cumulatively considerable and cumulative impacts would be less than significant.

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4.9 Hydrology and Water Quality

This section evaluates the potential environmental impacts related to hydrology and water quality associated with implementation of the proposed Project. Specifically, this section reviews the proposed Project's impact on sustainable groundwater management of the basin, and impacts on implementation of a water quality control plan or sustainable groundwater management plan. Other thresholds of significance associated with degradation of surface or ground water quality, alteration of the existing drainage patterns, and risk of release of pollutants due to project inundation are discussed in Section 4.19, *Effects Found Not to be Significant*; therefore, these issues are not studied further herein.

4.9.1 Environmental Setting

a. Watershed and Surface Water

The Burbank Media District Specific Plan Area (hereafter referred to as "Specific Plan Area") is located in the San Fernando Valley, within the Los Angeles River watershed. The Los Angeles River Watershed covers a land area of 834 square miles. The eastern portion spans from the Santa Monica Mountains to the Simi Hills while the western portion spans from the Santa Susana Mountains to the San Gabriel Mountains. The watershed encompasses and is shaped by the path of the 55-mile Los Angeles River, which flows from its headwaters in the mountains eastward to the northern corner of Griffith Park. Here the channel turns southward through the Glendale Narrows before it flows across the coastal plain and into San Pedro Bay near Long Beach (Los Angeles County n.d.).

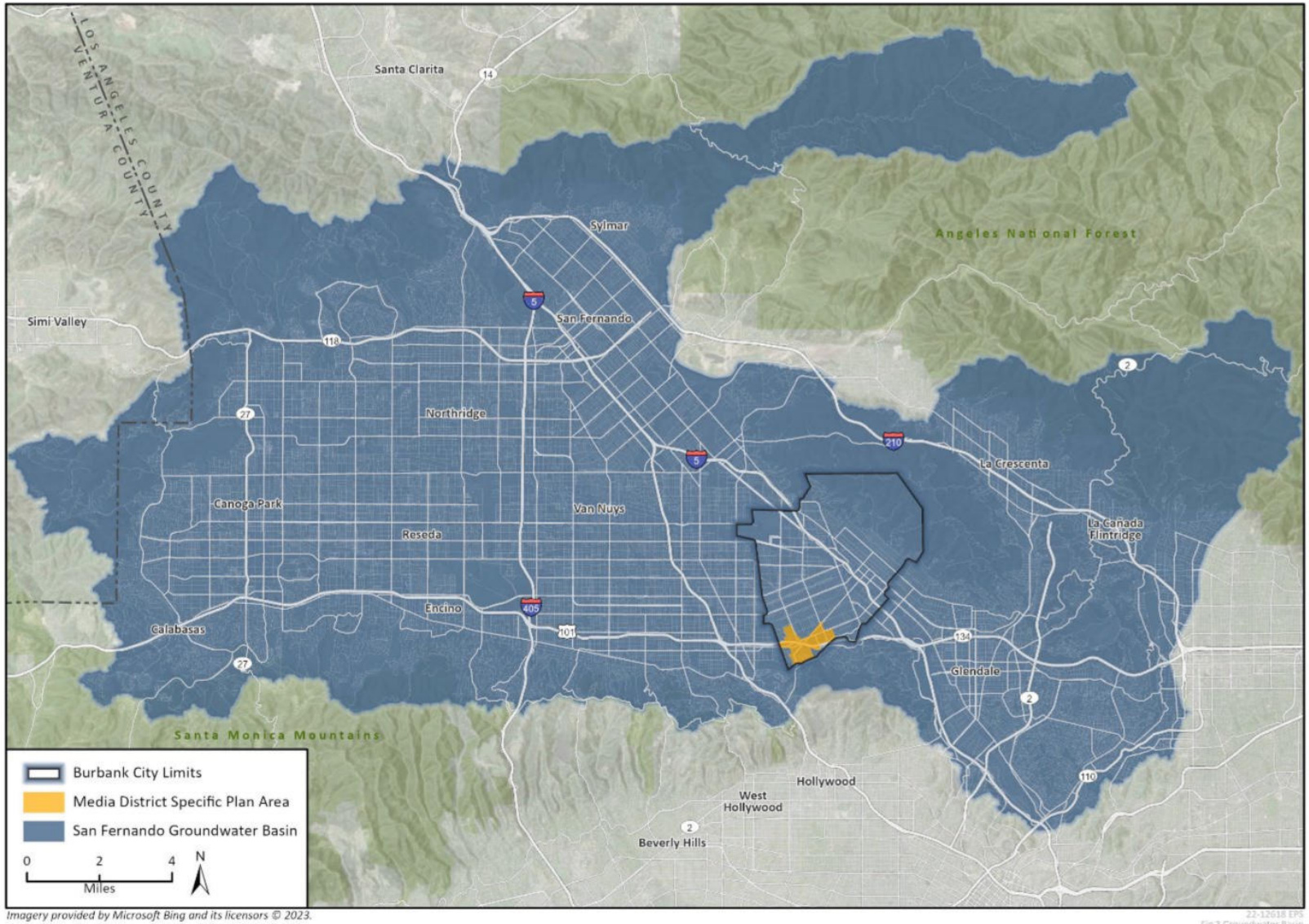
The Los Angeles River and its tributaries drain the San Fernando Valley. A portion of the Los Angeles River runs along the southern border of the Specific Plan Area for approximately 0.48 mile and is encompassed by the Specific Plan Area for approximately 0.11 mile. The Los Angeles River within and adjacent to the Specific Plan Area is channelized.

b. Groundwater Resources

The Specific Plan Area is underlain by the San Fernando Valley Ground Water Basin (San Fernando Basin). The San Fernando Basin is located in eastern Los Angeles County and includes the water-bearing sediments beneath the San Fernando Valley, Tujunga Valley, Browns Canyon, and the alluvial areas surrounding the Verdugo Mountains near La Crescenta and Eagle Rock (California Department of Water Resources [DWR] 2004). Figure 4.9-1 shows the boundaries of the San Fernando Basin in relation to the Specific Plan Area.

The San Fernando Basin is managed under an Adjudication Judgment administered by a Court-appointed Watermaster, the Upper Los Angeles River Area (ULARA) Watermaster (Rincon Consultants 2025). The ULARA Watermaster is responsible for administration of the San Fernando Basin adjudication. The City of Los Angeles has exclusive rights to extract and utilize the entire native safe yield of the San Fernando Basin. These exclusive rights are administered by the Los Angeles Department of Water and Power (LADWP). Burbank does not own any rights to naturally occurring water in the San Fernando Basin and extracts groundwater supplies under terms outlined in the 1979 water rights Judgment for the San Fernando Basin (Burbank 2021).

Figure 4.9-1 San Fernando Groundwater Basin



Burbank is entitled to extract up to 20 percent of all delivered water, including recycled water, to the San Fernando Basin and its tributary hill and mountain areas. In recent years, groundwater levels have generally declined, likely due to increased urbanizations, reduced artificial recharge, and continued extractions by the cities of Los Angeles, Burbank, Glendale, and San Fernando (ULARA Watermaster n.d.).

c. Groundwater Sources

The San Fernando Basin is the primary source of groundwater for the City of Burbank (hereafter referred to as "City" or "Burbank"), comprising approximately 51.4 percent of the City's total deliveries in 2020, and is part of the ULARA. The DWR *California Groundwater (Bulletin 118)* defines the boundaries of the San Fernando Basin, which is comprised of several subbasins, including the Sylmar, Verdugo, and Eagle Rock subbasins. Burbank lies near the middle of the San Fernando Basin, as shown previously in Figure 4.9-1. The San Fernando Basin is bounded on the north and northwest by the Santa Susana Mountains, on the north and northeast by the San Gabriel Mountains, the east by the San Rafael Hills, on the south by the Santa Monica Mountains and Chalk Hills, and on the west by the Simi Hills. The valley of the San Fernando Basin is drained by the Los Angeles River and its tributaries (DWR 2004). Precipitation in the San Fernando Basin ranges from 15 to 23 inches per year and averages 17 inches per year. Groundwater levels have remained stable since the basin's 1979 adjudication, discussed below (DWR 2004).

Burbank Water and Power (BWP) provides water services to the Specific Plan Area. BWP relies on three water supply sources to meet its demands: local groundwater, imported surface water from the State Water Project (SWP) and the Colorado River, and recycled water. In 2020, the BWP provided a total of 19,463 acre feet (AF) of water, consisting of 9,997 AF of groundwater, 3,149 AF of recycled water, 6,165 AF of imported potable water from the Metropolitan Water District of Southern California (Metropolitan), and 152 AF of imported raw (untreated) water from Metropolitan for groundwater replenishment (BWP 2021).

d. Water Quality

There are two major classes of pollutants: point source and non-point source. Point-source pollutants can be traced to their original source and are discharged directly from pipes or spills. Raw sewage discharging directly into a stream is an example of a point-source water pollutant. Non-point-source pollutants cannot be traced to a specific original source. Non-point-source pollution is caused by precipitation runoff collecting natural and human-made pollutants before depositing them into various watersheds, including: lakes, rivers, wetlands, coastal waters, and groundwater.

The primary sources of surface and groundwater pollution enter the water system via stormwater runoff from paved areas. This urban runoff can contain hydrocarbons, sediments, pesticides, herbicides, toxic metals, and coliform bacteria. Leaking septic tanks can cause similar types of contamination. Illegal waste dumping can introduce contaminants such as gasoline, pesticides, herbicides, and other harmful chemicals.

As previously mentioned regarding the Adjudication Judgement, the City of Los Angeles holds all rights to naturally occurring water in the San Fernando Basin; however, the City of Los Angeles, through LADWP, has been unable to fully produce its annual entitlement due to groundwater contamination. In the 1980s, the San Fernando Basin was found to be heavily contaminated with volatile organic compounds (VOCs) from multiple sources, including industrial sources, such as Lockheed-Martin's historical manufacturing presence in the City. Multiple areas in the San Fernando basin were

designated as Superfund sites, and cleanup was conducted with the assistance of the United States Environmental Protection Agency (USEPA). Primary pollutants of concern include trichloroethylene (TCE) and perchloroethylene (PCE). In the 1990s, further contaminants, including nitrates and chromium, were discovered leading to the aquifer's classification in 1997 as an "Extremely Impaired Source" (BWP 2021).

The Burbank Operable Unit (BOU) was established under the USEPA to clean up the groundwater contaminated by historical industrial releases; the BOU came online in 1996 and began treating extracted groundwater through a system of eight wells and a VOC removal facility. To meet standards for nitrates and chromium, water from the BOU is pumped to the nearby Valley Pumping Plant, where it is blended with treated imported water purchased from Metropolitan to lower the concentrations of the priority contaminants. The Valley Pumping Plant is designed to produce 12,336 AFY; however, system demand for the blended water kept production levels at an average of 9,900 AFY between 2015 and 2019 (BWP 2021).

Meanwhile, the City of Burbank has not had the year-round potable water demand necessary to utilize the maximum 9,000-gallons-per-minute (GPM) capacity of BOU groundwater production mandated by the USEPA (LADWP 2021). Therefore, the LADWP and the City of Burbank, which share a common goal to remediate the San Fernando Basin to maintain a healthy groundwater supply, have established the Los Angeles-Burbank Interim Connection, which connects the BWP and LADWP systems, allowing BWP to transfer up to 3,200 GPM of potable water into LADWP's system, in exchange for increased credits for San Fernando Basin water from LADWP to BWP (LADWP 2021). The Interim Connection is mutually beneficial by maximizing the removal of contaminants from the San Fernando Basin underlying the City of Burbank, while maximizing the beneficial use of water treated as a requirement of the BOU (LADWP 2021).

4.9.2 Regulatory Setting

a. Federal Regulations

Clean Water Act

Congress enacted the Clean Water Act (CWA), formerly the Federal Water Pollution Control Act of 1972, with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters in the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and non-point source discharges to surface water. Those discharges are regulated by National Pollutant Discharge Elimination System (NPDES) permit process (CWA Section 402). NPDES permitting authority is administered by the California State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards (RWQCB). The Specific Plan Area is in a watershed administered by the RWQCB Region 4 (Los Angeles Region).

Section 401 of the CWA requires that any activity that may result in discharges into a State water body must be certified by a RWQCB. This certification ensures that the proposed activity does not violate State and/or federal water quality standards. The limits of non-tidal waters extend to the Ordinary High Water Mark, defined as the line on the shore established by the fluctuation of water and indicated by physical characteristics, such as natural line impressed on the bank, changes in the character of the soil, and presence of debris. The United States Army Corps of Engineers (USACE) may issue either individual, site-specific permits or general, nationwide permits for discharge into U.S. waters.

Clean Water Act Section 303(d)

Section 303(d) of the CWA (CWA, 33 USC 1250, et seq., at 1313(d)) requires states to identify "impaired" waterbodies as those which do not meet water quality standards. States are required to compile this information in a list and submit the list to the USEPA for review and approval. This list is known as the Section 303(d) list of impaired waters. As part of this listing process, states are required to prioritize waters and watersheds for future development of total maximum daily loads (TMDL). The SWRCB and RWQCBs have ongoing efforts to monitor and assess water quality, to prepare the Section 303(d) list, and to develop TMDL requirements.

b. State Regulations

National Pollutant Discharge Elimination System

The federal government also administers the NPDES permit program, which regulates discharges into surface waters. The primary regulatory control relevant to the protection of water quality is the NPDES permit administered by the SWRCB. The SWRCB establishes requirements prescribing the quality of point sources of discharge and water quality objectives. These objectives are established based on the designated beneficial uses (e.g., water supply, recreation, and habitat) for a particular surface water body or groundwater basin. The NPDES permits are issued to point source dischargers of pollutants to surface waters pursuant to California Water Code Division 7, Chapter 5.5, which implements the CWA. Examples include, but are not limited to, public wastewater treatment facilities, industries, power plants, and groundwater cleanup programs discharging to surface waters (CCR Title 23, Division 3, Chapter 9 Section 2200). The RWQCB establishes and regulates discharge limits under NPDES permits.

Projects that would disturb more than one acre of land during construction are required to file a Notice of Intent with the SWRCB to be covered under the NPDES Construction General Permit for discharges of stormwater associated with construction activity. The project proponent must develop measures that are consistent with the Construction General Permit. Furthermore, a Stormwater Pollution Prevention Plan (SWPPP) must be developed and implemented for each site covered under the Construction General Permit. The SWPPP describes the best management practices (BMPs) the discharger would use to protect stormwater runoff and reduce potential impacts on surface water quality through the construction period. The SWPPP would contain the following:

- A visual monitoring program;
- A chemical monitoring program for nonvisible pollutants (to be implemented if a BMP failure occurs); and
- A sediment monitoring program if the site discharges directly to a water body on the 303(d) list for sediment.

Porter-Cologne Water Quality Control Act

California's Porter Cologne Water Quality Control Act of 1970 (Porter-Cologne Act) established the SWRCB and divided the State into nine regional basins, each with a RWQCB. The Specific Plan Area is located within the jurisdiction of the LARWQCB. The SWRCB is the primary State agency with responsibility to protect surface water and groundwater quality. The Porter-Cologne Act authorizes the SWRCB to draft policies regarding water quality in accordance with CWA Section 303. In addition, the Porter-Cologne Act authorizes the SWRCB to issue waste discharge requirements for projects that would discharge to State waters. These requirements regulate discharges of waste to surface and

groundwater, regulate waste disposal sites, and require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, or oil or petroleum product.

The Porter-Cologne Act requires the SWRCB or the RWQCBs to adopt water quality control plans (Basin Plans) and policies for the protection of water quality. Basin Plans must conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its State Water Policy.

Basin Plans must:

- Identify beneficial uses for the water to be protected,
- Establish water quality objectives for the reasonable protection of the beneficial uses, and
- Establish an implementation program for achieving the water quality objectives.

Basin Plans also provide the technical basis for determining waste discharge requirements, taking enforcement actions, and evaluating clean water grant programs. Basin Plans are updated and reviewed every three years in accordance with Article 3 of Porter-Cologne Act and Clean Water Act Section 303(c).

Municipal Stormwater NPDES Permit

On November 8, 2012, the LARWQCB adopted Order R4-2012-0175 ("Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County") (MS4 Permit). Order R4-2012-0175 became effective on December 28, 2013, and serves as the NPDES permit for coastal watershed stormwater and non-stormwater discharges originating from the Los Angeles County Region. The permit covers the land areas in the Los Angeles County Flood Control jurisdiction, unincorporated areas of Los Angeles County, and 84 cities in the County. The City of Burbank is included in the MS4 Permit as a permittee under Order R4-2012-0175. In coordination with permittees under MS4 Permit, LARWQCB staff perform annual performance reviews and evaluations of the City's stormwater management program and NPDES compliance activities.

c. Local Regulations

City of Burbank Low Impact Development Ordinance

On June 16, 2015, the Burbank City Council adopted a Low Impact Development (LID) Ordinance in compliance with the requirements of the MS4 Permit. The City uses the LID Ordinance to review and permit development and redevelopment projects that qualify under the triggering requirements of the ordinance. Qualifying development projects are directed to control pollutants, pollutant loads, and runoff volume to the maximum extent feasible by minimizing impervious surface area and controlling runoff from impervious surfaces through infiltration, evapotranspiration, bioretention, and/or rainfall harvest and use. The intent of the LID ordinance is to retain stormwater runoff on site in a manner that is similar to predevelopment conditions.

Water Quality Control Plan for the Los Angeles Region

The Specific Plan Area is under the jurisdiction of RWQCB Region 4 (Los Angeles Region). The LARWQCB provides permits for projects that may affect surface waters and groundwater locally, and is responsible for preparing the Water Quality Control Plan for the Los Angeles Region (Basin Plan). The Basin Plan designates beneficial uses of water in the region and establishes narrative and

numerical water quality objectives. Water quality objectives, as defined by the CWA Section 13050(h), are the "limits or levels of water quality constituents or characteristics which are established for the reasonable protection of beneficial uses or the prevention of nuisance within a specific area." The State has developed TMDLs that are a calculation of the maximum amount of a pollutant that a water body can have and still meet water quality objectives established by the region.

Enhanced Watershed Management Program Plan

Conditions of the MS4 Permit require that all permittees develop a watershed management plan on an individual or joint basis that will address water quality issues in the permittee's jurisdictional area. The City of Burbank is a member of the Los Angeles River Watershed Management Group's Enhanced Watershed Management Plan (EWMP). The EWMP submitted its revised EWMP Plan to the RWQCB for review in January 2016 and the plan was approved in April 2016. The EWMP Plan, along with a Coordinated Monitoring Plan, serves as a guiding document for implementing water quality improving infrastructure, policies and programs.

Burbank2035 General Plan

The following are the specific policies relating to hydrology and water quality within the Burbank2035 General Plan's Land Use and Open Space and Conservation Elements:

Land Use Element

Goal 2 Sustainability: Burbank is committed to building and maintaining a community that meets today's needs while providing a high quality of life for future generations. Development in Burbank respects the environment and conserves natural resources.

Policy 2.6: Design new buildings to minimize the consumption of energy, water, and other natural resources. Develop incentives to retrofit existing buildings for a new reduction in energy consumption, water consumption, and stormwater runoff.

Open Space and Conservation Element

Goal 9 Water Resources: Adequate sources of high-quality water provide for various uses within Burbank.

Policy 9.1: Meet the goal of a 20% reduction in municipal water use by 2020.

Policy 9.2: Provide public information regarding the importance of water conservation and avoiding wasteful water habits.

Policy 9.3: Offer incentives for water conservation and explore other water conservation programs.

Policy 9.4: Pursue infrastructure improvements that would expand communitywide use of recycled water.

Policy 9.5: Require on-site drainage improvements using native vegetation to capture and clean stormwater runoff.

Urban Storm Water and Urban Runoff Management Programs

BMC Sections 9-3-401 through 9-3-414 adopt the Standard Urban Storm Water Mitigation Plan for Los Angeles County and Cities in Los Angeles and provide requirements for storm water pollution control measures for development planning.

4.9.3 Impact Analysis

a. Significance Thresholds

For purposes of this environmental analysis, thresholds of significance are based on the questions in Appendix G of the *CEQA Guidelines*, which state that impacts related to hydrology and water quality would be potentially significant if implementation of the proposed Project would do any of the following:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
    a. Result in substantial erosion or siltation on- or off-site
    b. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site
    c. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff
    d. Impede or redirect flood flows
4. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation
5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan

Threshold 2 and 5 are analyzed below.

b. Effects Found Not to be Significant

Thresholds 1, 3, and 4 were determined to have a less than significant impact and, therefore, are discussed under Section 4.19, *Effects Found Not to be Significant and* summarized below.

While construction of future development accommodated by the proposed Project could impact surface or ground water quality due to erosion resulting from exposed soils and the generation of water pollutants, adherence to applicable existing regulations would reduce impacts to a less-than-significant level.

The identified opportunity sites for development under the proposed Project are primarily paved and/or previously developed with structures. Therefore, development under the proposed Project would not be anticipated to substantially alter drainage patterns or alter drainage patterns to an extent that would result in substantial erosion, siltation, or flooding on- or off-site. Furthermore, the uses associated with the proposed Project (i.e., residential and commercial) would not be sources of high levels of stormwater pollution upon operation, the majority of the Specific Plan Area is not

located within a 100-year flood hazard area, and the proposed Project would not place housing or structures such that flood flows would be impeded or redirected. Therefore, future development projects under the proposed Project would not substantially alter the existing drainage pattern of the Specific Plan Area in a manner that would result in substantial erosion or siltation on- or off-site; increase the rate or amount of surface runoff that would result in flooding on- or off-site; or impede or redirect flood flows. Impacts would be less than significant.

Nearby enclosed bodies of water are not considered large enough to result in considerable risk of inundation in Burbank from failure of any of the facilities. Therefore, potential impacts associated with flooding from a seismically induced seiche would not be significant. Since Burbank is located over 15 miles inland from the Pacific Ocean, tsunamis are not considered a hazard for the Specific Plan Area. The proposed Project would increase development capacity, thereby potentially increasing the number of people and structures exposed to potential flooding. While there is the potential for flooding to impact portions of the Specific Plan Area, particularly during major storm events, future development projects under the proposed Project would include residential and commercial spaces, which are considered to be low risk regarding the storage or use of significant quantities of hazardous materials. Therefore, risks related to the release of hazardous materials due to inundation are minimal, and impacts would be less than significant.

c. Methodology

This section describes the potential environmental impacts of the proposed Project relevant to hydrology and water quality. The impact analysis is based on an assessment of baseline conditions for Burbank, including groundwater and water quality. This analysis identifies potential impacts based on the predicted interaction between the affected environment and construction, operation, and maintenance activities related to the proposed Project.

d. Projects Impacts

Threshold 2:	Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Impact HYD-1 FUTURE DEVELOPMENT PROJECTS UNDER THE PROPOSED PROJECT WOULD INCREASE WATER USAGE, BUT SUCH USES WOULD BE LESS THAN SIGNIFICANT BECAUSE THERE WOULD BE SUFFICIENT WATER SUPPLY AVAILABLE TO MEET THE PROJECTED GROWTH WITHOUT DEPLETION OF GROUNDWATER SUPPLIES. FUTURE DEVELOPMENT PROJECTS UNDER THE PROPOSED PROJECT MAY ALSO INCREMENTALLY INCREASE THE AMOUNT OF IMPERVIOUS SURFACES IN THE SPECIFIC PLAN AREA, RESULTING IN INCREASED RUNOFF AND DECREASED PERCOLATION TO THE SAN FERNANDO BASIN. HOWEVER, WITH ADHERENCE TO LID ORDINANCE REQUIREMENTS AND BMPS, THESE IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Future development projects carried out under the proposed Project would increase demand for water, some of which would derive from groundwater sources since groundwater is a part of the supply mix for BWP.

Construction activities carried out under the proposed Project would primarily occur as part of infill/ redevelopment. Construction activities, such as subterranean excavation of parking garages, below ground building areas, or deeper foundations, could encounter groundwater, which would then require dewatering. This water is often used during construction for cleaning, dust control, and other uses and, thus, would replace other construction water supply. In addition, any dewatering discharge

would be required to comply with the appropriate Dewatering Permit requirements, such as NPDES Construction General Permit Order Number R4-2012-0175 or the dewatering requirements of the Water Quality Management Plan. Dewatering is a temporary construction activity, and development accommodated under the proposed Project that involves subterranean development would be required to adhere to the CBC to ensure that permanent dewatering would not be required and all dewatering activities would cease upon completion of construction. Thus, construction activities would not substantially deplete groundwater supplies.

Further, potential construction activities associated with future development under the proposed Project, such as excavation for subterranean parking lots and foundation-laying for tall buildings, could potentially extend into the underlying groundwater table. Construction activities overlying areas with shallower groundwater depth could expose groundwater resources to contamination. However, the risk of groundwater contamination during construction is minimal and would most likely occur due to spills or leaks from equipment or materials used in construction. Developers of individual project sites one acre or more in size are also required to prepare a SWPPP, which includes BMPs to prevent contamination of stormwater and runoff during construction. Typical construction BMPs to prevent stormwater contamination would also prevent contamination of groundwater resources, as exemplified by the following BMPs:

- Construction equipment and vehicles shall be properly maintained.
- All materials shall be properly stored and transported.
- Fuels will be stored in secure areas.

With implementation of appropriate construction BMPs, the impact of any future development projects under the proposed Project on groundwater resources would be minimized, and impacts related to supply and recharge would be less than significant.

As described in Chapter 2, *Project Description*, in general, future development projects carried out under the proposed Project would result in the re-use of properties, conversion of uses in response to market demand (e.g., select industrial to commercial), and more intense use of land in defined areas, such as development of the opportunity sites. With development of these areas, the amount of impervious surface in the Specific Plan Area could incrementally increase; however, due to modern requirements, such as the City of Burbank LID Ordinance requirements and post-construction BMPs regarding infiltration, recharge, and onsite detention/retention of stormwater runoff, the net amount of impervious surface in the Specific Plan Area may actually decrease with new development carried out under the proposed Project. However, such development would primarily consist of infill in already urbanized areas, where increases in impervious surfaces, if any, would be minimal. Additionally, the proposed Project does not involve water intensive land uses, such as agricultural or single-family residential uses. Thus, future development projects carried out under the proposed Project would not substantially interfere with groundwater recharge.

The underlying San Fernando Basin is not a medium- or a higher priority basin under the DWR classification required by Sustainable Groundwater Management Act (SGMA); it is classified as “Very Low Priority” and is not required to form a groundwater sustainability agency (GSA) or adopt a groundwater sustainability plan (GSP)). Further information on the water supply mix for the proposed Project is contained in Section 4.17, *Utilities and Service Systems,* where it is detailed that there is ample water supply available for operation of development carried out under the proposed Project regardless of the groundwater mix for any given year. Therefore, as groundwater supply is sufficient, the proposed Project would not impact groundwater supplies, and impacts would be less than significant.

Determination

Less than significant impact

Threshold 5:	Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Impact HYD-2 THE PROPOSED PROJECT WOULD NOT CONFLICT WITH OR OBSTRUCT THE BASIN PLAN DUE TO MANDATORY COMPLIANCE WITH FEDERAL, STATE, AND LOCAL REGULATIONS. FURTHERMORE, THE SPECIFIC PLAN AREA IS WITHIN AN ADJUDICATED AND "VERY LOW PRIORITY" BASIN; THEREFORE, DEVELOPMENT OF A GROUNDWATER SUSTAINABILITY PLAN IS NOT REQUIRED, AND THE PROPOSED SPECIFIC PLAN WOULD NOT CONFLICT WITH OR OBSTRUCT A SUSTAINABLE GROUNDWATER MANAGEMENT PLAN. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Future development projects under the proposed Project would result in a significant impact if activities would conflict with applicable water quality permits, waste discharge requirements, water quality control plan, or a sustainable groundwater management plan.

Future development projects under the proposed Project would be required to comply with applicable regulations, standards, and policies, including the NPDES Construction General Permit, which would prevent violations of water quality standards and the waste discharge requirements of the MS4 Permit and BMC that are set to maintain compliance with the goals of the Basin Plan. Impacts related to obstruction of a water quality control plan would be less than significant.

As discussed under *Environmental Setting* and under Impact HYD-1, groundwater use by future development projects under the proposed Project are not anticipated to cause significant impacts to groundwater levels because the San Fernando Basin is determined to be a 'very low' priority basin by DWR under SGMA, is not in overdraft, and is utilized by numerous water agencies as only a part of the supply mix for the area. There is no GSA with jurisdiction over the San Fernando Basin and thus, no GSP is in place. Therefore, there is no sustainable groundwater management plan, which addresses groundwater underlain by or used by the Specific Plan Area, and groundwater from other basins is not expected to be utilized by projects carried out under the proposed Project because existing supply is more than adequate. Impacts related to potential conflicts with, or obstruction of a sustainable groundwater management plan would be less than significant.

Determination

Less than significant impact

4.9.4 Cumulative Impacts

Groundwater Supply

For the cumulative analysis related to groundwater supply, the cumulative projects being considered include related projects located within the same groundwater basin or those that would utilize groundwater from the same groundwater basin as the proposed Project. Therefore, the cumulative study area for groundwater is the San Fernando Basin and cumulative projects would include the Downtown Burbank Transit Oriented Development (TOD) Specific Plan (a consolidation and update of the North San Fernando Boulevard Master Plan and the Burbank Center Plan) and the Golden State Specific Plan (GSSP), which are currently being prepared by the City, as described in Section 3, *Environmental Setting*. As described in Section 3, *Environmental Setting,* the Downtown TOD Specific

Plan would facilitate development of up to 9,944 residential units and 6,083,657 square feet of commercial and business development land uses; and the GSSP would facilitate development of up to 7,205 residential units and 3,149,623 square feet of commercial and business development land uses. Cumulative impacts may occur if impacts of the proposed Project combine with similar impacts of other projects in the cumulative scenario.

Cumulative increases in impervious surface areas within the groundwater basin could affect groundwater recharge. Additional water demand would occur with population growth associated with development of the proposed Project in conjunction with the two aforementioned Specific Plans. Potential increase in groundwater pumping above current levels due to buildout of the region could potentially decrease available groundwater supplies and contribute to the ongoing overdraft of the San Fernando Basin. Each cumulative project located within the City, including the two aforementioned Specific Plans, would also be reviewed by the City of Burbank to verify infiltration BMPs are incorporated into project design, where infiltration is feasible. Each cumulative project within the City, including development associated with the two aforementioned Specific Plans, would also be reviewed by the BWP to confirm adequate water supplies are available such that water supplied from groundwater sources would not substantially decrease groundwater supplies. Finally, BWP is responsible for ensuring the San Fernando Basin is sustainably managed in accordance with the ULARA Watermaster, which would minimize the potential for water supplied to cumulative development from groundwater to substantially decrease groundwater supplies. For these reasons, the incremental effect of the proposed Project related to the groundwater supply would not be cumulatively considerable and cumulative impacts would be less than significant.

Water Quality

The cumulative study area for hydrology and water quality is the Upper Los Angeles River Watershed. Cumulative projects include the Downtown Burbank TOD Specific Plan (an update to the Burbank Center Plan) and the GSSP, which are currently being prepared by the City, as described in Section 3, *Environmental Setting*. Cumulative impacts may occur if impacts of the proposed Project combine with similar impacts of other projects in the cumulative scenario.

Development of the proposed Project in conjunction with the two aforementioned Specific Plans could potentially increase impervious surfaces throughout the Upper Los Angeles River Watershed and contribute to pollutant loading in runoff reaching both the storm drain system and the receiving waters, such as the Los Angeles River. However, cumulative projects, including those resulting from implementation of the two aforementioned Specific Plans, would be required to comply with applicable regulations, standards, and policies, including the NPDES Construction General Permit. Compliance would minimize the potential for violations of water quality standards and the waste discharge requirements of the MS4 Permit and BMC, thereby ensuring consistency with the goals of the Basin Plan. The design of each cumulative project within the City, including projects resulting from the two aforementioned Specific Plans would be subject to City review and approval of project design to verify the appropriate drainage improvements and BMPs would be implemented to manage surface flows and reduce off-site stormwater discharge into groundwater. Compliance with the standards, permits, and regulations detailed under Impact HYD-2 would ensure that the incremental effect of the proposed Project related to the water quality would not be cumulatively considerable and cumulative impacts would be less than significant.

4.10 Land Use and Planning

This section evaluates the proposed Project's environmental impacts related to land use and planning associated with implementation of the proposed Project. Specifically, this section reviews the proposed Project's impact related to a conflict with any land use plan, policy, or regulation. Other thresholds of significance associated with the division of an established community is discussed in Section 4.19, *Effects Found Not to be Significant*; therefore, these issues are not studied further herein.

4.10.1 Environmental Setting

City of Burbank Land Uses

The City of Burbank (hereafter referred to as "City" or "Burbank") currently has the following general plan land use designations: Low Density Residential, Medium Density Residential, High Density Residential, Corridor Commercial, Regional Commercial, Downtown Commercial, South San Fernando Commercial, North Victory Commercial/Industrial, Rancho Commercial, Media District Commercial, Golden State Commercial/Industrial, Open Space, Institutional, and Airport.

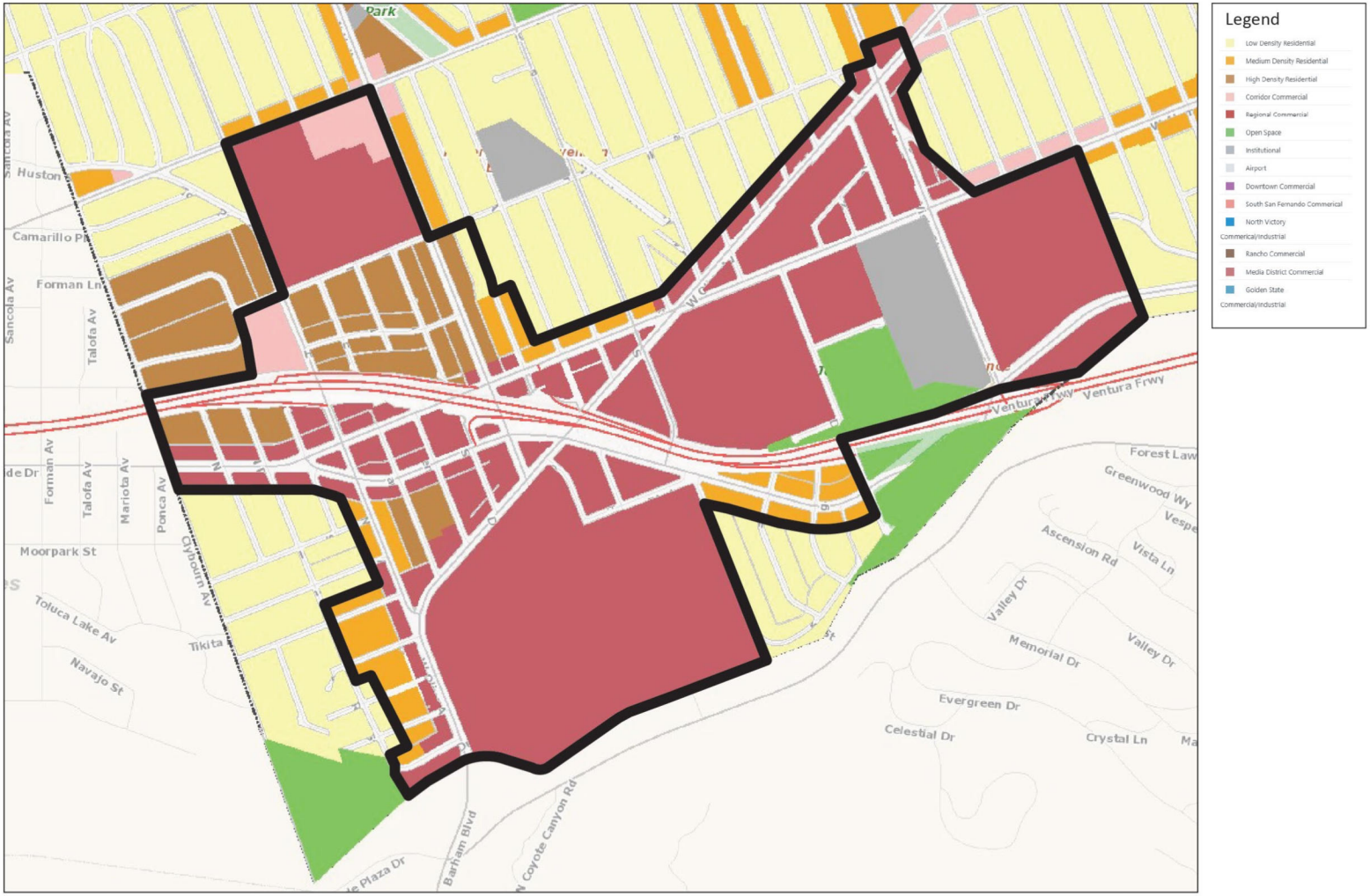
The City's Zoning Regulations (Title 10 of the Burbank Municipal Code [BMC]) establishes residential and nonresidential zones with specific development standards to achieve the goals and policies of each general plan land use designations. The City's current zoning designations include residential zones of varying density, commercial, industrial, open space, and neighborhood-specific zones including those for the Media District.

Specific Plan Area Land Uses

The approximately 544-acre Burbank Media District Specific Plan Area (hereafter referred to as "Specific Plan Area") consists of an urbanized setting and is occupied by a mix of residential, commercial, office, medical, education, open space, and media studios, including notable production companies, such as Walt Disney Studios, Warner Bros. Studios, and Burbank Studios. According to Chapter 6 (Land Use) of the proposed Project, approximately 50.5 percent of the Plan Area is dedicated to media-oriented, approximately 17.4 percent is office and commercial uses, and 7.6 percent are institutional uses. Residential uses make up approximately 15 percent of the Plan Area, approximately 5.2 percent are areas for parking, and approximately 2.2 percent of the Plan Area is vacant land. the Specific Plan Area's population is approximately 4,500 persons and includes 2,500 housing units.

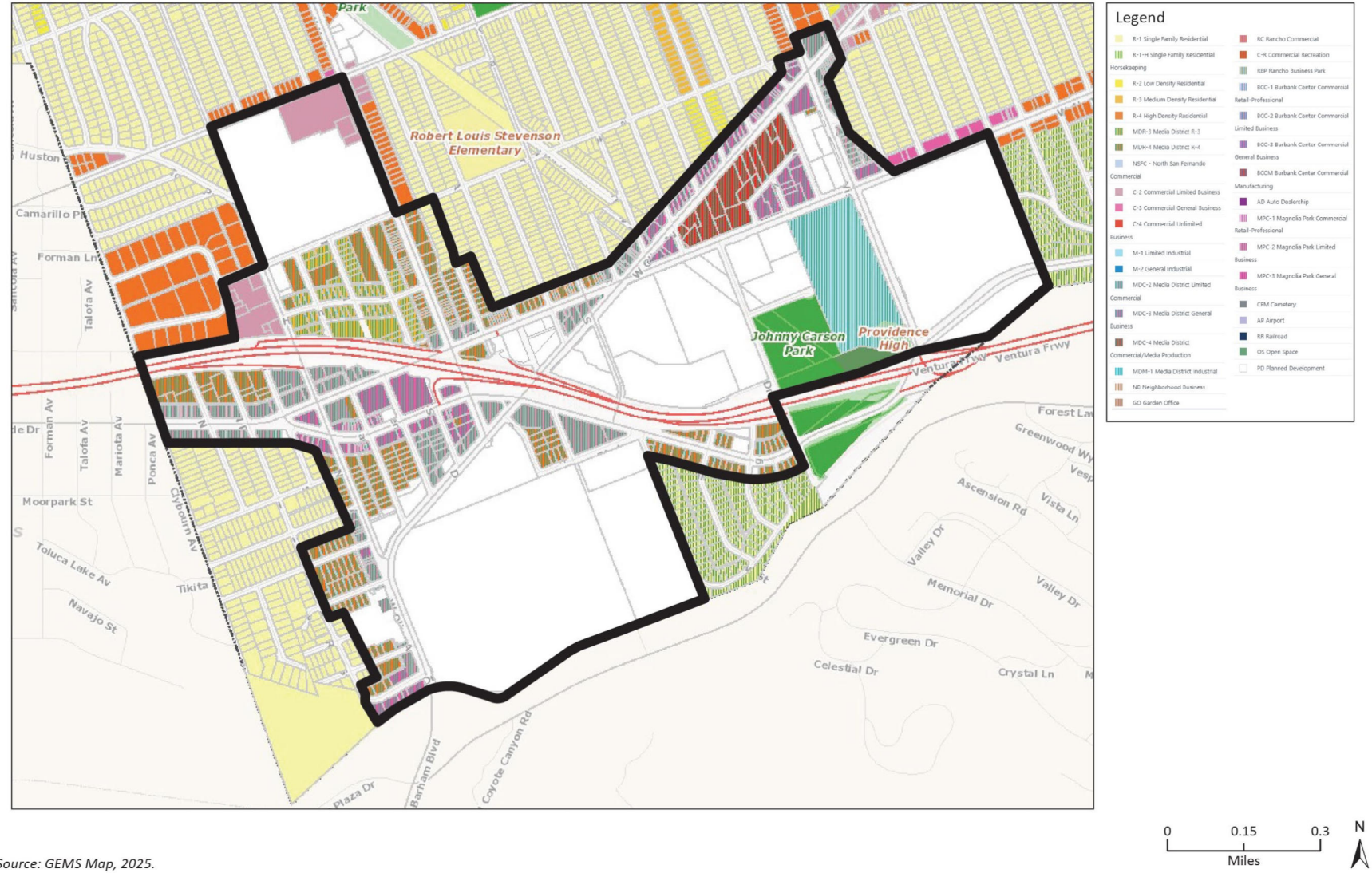
Figure 4.10-1 below shows the general plan land use designations and Figure 4.10-2 shows the zoning designations in the Specific Plan Area.

Figure 4.10-1 Specific Plan Area Existing Land Uses Designations



Source: GEMS Map, 2025.

Figure 4.10-2 Specific Plan Area Existing Zoning Designations



Source: GEMS Map, 2025.

4.10.2 Regulatory Setting

a. State Regulations

California Planning and Zoning Law

State law requires each city and county in California to adopt a general plan for the physical development of the land within its planning area (Government Code Sections 65300-65404). The general plan must contain land use, housing, circulation, open space, conservation, noise, safety, and environmental justice elements, as well as any other elements that the city or county may wish to adopt. The circulation element of a local general plan must be correlated with the land use element.

Zoning authority originates from city and county police power and from the State's Planning and Zoning Law, which sets minimum requirements for local zoning ordinances. The city or county zoning code is the set of detailed requirements that implement the general plan policies at the level of the individual parcel. The zoning code presents standards for different uses and identifies which uses are allowed in the various zoning districts of the jurisdiction. Since 1971, State law has required the city or county zoning code to be consistent with the jurisdiction's general plan. The consistency requirement does not apply to charter cities unless the charter city adopts a consistency rule.

Government Code Section 65454

State law requires that specific plans shall not be adopted or amended unless the proposed plan is consistent with the General Plan.

Government Code Section 65860

State law requires that zoning ordinances in both a general law and charter city or town be consistent with the general plan. A zoning ordinance is consistent with an adopted general plan only if the various land uses authorized by the zoning ordinance "are compatible with the objectives, policies, general land uses, and programs specified in the plan" (Government Code Section 65860(a)). State law also provides that in the event a zoning ordinance becomes inconsistent with a general plan by reason of amendment to such a plan, the zoning ordinance must be amended within a reasonable time so that it is consistent with the general plan as amended (Government Code Section 65860(c)). The City of Burbank is a charter city and is, therefore, required to have zoning consistency.

Sustainable Communities and Climate Protection Act (Senate Bill 375)

Senate Bill (SB) 375 focuses on aligning transportation, housing, and other land uses to achieve regional greenhouse gas (GHG) emission reduction targets established under the California Global Warming Solutions Act, also known as Assembly Bill (AB) 32. SB 375 requires Metropolitan Planning Organizations (MPO) to develop a Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan (RTP), with the purpose of identifying policies and strategies to reduce per capita passenger vehicle-generated GHG emissions. As set forth in SB 375, the SCS must achieve the following: identify the general location of land uses, residential densities, and building intensities within the region; identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period; identify areas within the region sufficient to house an eight-year projection of the regional housing need; identify a transportation network to service the regional transportation needs; gather and consider the best practically available scientific information regarding resource areas and farmland in the

region; consider the state housing goals; establish the land use development pattern for the region that, when integrated with the transportation network and other transportation measures and policies, will reduce GHG emissions from automobiles and light-duty trucks to achieve GHG emission reduction targets set by the California Air Resources Board (CARB), if there is a feasible way to do so; and comply with air quality requirements established under the California Clean Air Act.

The City of Burbank is a member of the Southern California Association of Governments (SCAG), a Joint Powers Agency established under Government Code Section 6502 et seq. Pursuant to federal and State law, SCAG serves as a Council of Governments, a Regional Transportation Planning Agency, and the MPO for Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial Counties. SCAG is responsible for preparing the RTP/SCS and the Regional Housing Needs Assessment (RHNA) in coordination with other State and local agencies. These documents include population, employment, and housing projections for the region and its 15 subregions.

Existing law requires local governments to adopt a housing element as part of their general plan and update the housing element every four to eight years. SB 375 requires the RHNA to allocate housing units within the region in a manner consistent with the development pattern adopted by the SCS.

On April 4, 2024, SCAG adopted the 2024-2050 RTP/SCS, which is an update to the previous 2020-2045 RTP/SCS (SCAG 2024). Using growth forecasts and economic trends, the RTP/SCS provides a vision for transportation throughout the region through 2050 that achieves the statewide reduction targets and in so doing identifies the amount and location of growth expected to occur within the region.

b. Regional Regulations

SCAG 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy

On April 4, 2024, the SCAG Regional Council adopted the 2024-2050 RTP/SCS. The 2024-2050 RTP/SCS presents a long-term transportation vision through the year 2050 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2024-2050 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. SCAG's overarching strategy for achieving its goals is integrating land use and transportation. SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system. The goals for the 2024-2050 RTP/SCS fall into four core categories: Mobility: build and maintain a robust transportation network; Communities: develop, connect, and sustain communities that are livable and thriving; Environment: create a healthy region for the people of today and tomorrow; and Economy: support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents. The 2024-2050 RTP/SCS's goals are implemented through decisions and actions consistent with the policies detailed in Chapter 3 of the 2024-2050 RTP/SCS.

c. Local Regulations

Burbank2035 General Plan

Adopted in 2013, the Burbank2035 General Plan is a long-range statement of policies for the development and preservation of Burbank. The Burbank2035 General Plan vision consists of balanced

development, community image and character, complete streets, economic vitality, environmental equity, housing variety, open space and conservation proactive and responsive government, quality neighborhoods and schools, safety, and sustainability.

The Burbank2035 General Plan's goals are implemented through decisions and actions consistent with the objectives policies and actions of each of the eight General Plan elements, including the Air Quality and Climate Change Element, 2021-2029 Housing Element, Land Use Element, Mobility Element, Noise Element, Open Space and Conservation Element, Safety Element, and Plan Realization Element.

The Air Quality and Climate Change Element of the Burbank2035 General Plan addresses the reduction of air pollution and greenhouse gas (GHG) emissions, protect people and places from toxic air contaminants (TACs) and odors, comply with GHG emission reduction goals, and adapt to changed environmental conditions related to climate change.

The Land Use Element of the Burbank2035 General Plan guides future development in Burbank and designates appropriate locations for different land uses including open space, parks, residences, commercial uses, industry, schools, and other public uses. The Land Use Element establishes standards for residential density and non-residential building intensity for land located throughout the city.

The Mobility Element of the Burbank2035 General Plan defines the transportation system within the City including the streets, railways, transit routes, bike paths, and sidewalks. The goal of the Mobility Element is to identify circulation problems related to major thoroughfares, transportation routes, terminals, other local public utilities and facilities in the early stages and resolve them in local goals and policies without costly delays.

The Noise Element of the Burbank2035 General Plan describes the existing noise environment in Burbank, identifies noise sources and problems affecting community safety and comfort, and establishes policies and programs that limit community exposure to excessive noise levels.

The Open Space and Conservation Element of the Burbank2035 General Plan describes the City's natural resources and addresses the City's parks and recreation opportunities. The Open Space and Conservation Element also addresses the preservation of renewable and non-renewable natural resources.

The Safety Element of the Burbank2035 General Plan identifies natural hazards and potentially hazardous conditions in Burbank. The Safety Element also identifies the City's plans for preparing for health and safety hazards.

The Plan Realization Element of the Burbank2035 General Plan describes the means for implementing the goals and policies identified in the Air Quality and Climate Change Element, 2021-2029 Housing Element, Land Use Element, Mobility Element, Noise Element, Open Space and Conservation Element, and Safety Element of the Burbank2035 General Plan.

Existing Media District Specific Plan

The existing Media District Specific Plan is a policy document that provides land use policies and development standards for the commercial, residential, institutional, and industrial areas in the Specific Plan Area. The existing Specific Plan was created in 1991, concentrated on development growth-control, assured that all new development could be accommodated by infrastructure and public services, and preserved the character of neighborhoods within the Specific Plan Area.

Burbank Municipal Code and Zoning Ordinance

The Burbank Municipal Code (BMC) establishes regulations that implement the City's General Plan. Title 10, Zoning Regulations, contains regulations that control the uses of land; allowable building density; the locations, appearance, height, and massing of structures; the open spaces associated with structures; and dimensions of sites; and sets requirements for signage and on- and off-site parking.

4.10.3 Impact Analysis

a. Thresholds of Significance

For the purposes of this environmental analysis, thresholds of significance are based on the question in Appendix G of the *CEQA Guidelines*, which states that impacts related to land use and planning would be potentially significant if implementation of the proposed Project would do any of the following:

1. Physically divide an established community.
2. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Threshold 2 is analyzed below.

b. Effects Found Not to be Significant

The proposed Project was determined to have no impact as related to Threshold 1 and, therefore, is discussed in Section 4.19, *Effects Found Not to Be Significant* and summarized below.

Implementation of the proposed Project would prioritize future development projects on infill sites in already developed areas of the Specific Plan Area. Since the Specific Plan Area is built out, if new roads are required for future development projects under the proposed Project, they would either be short public roads to facilitate access to a site or private streets within a proposed development project. Therefore, future development projects under the proposed Project are not anticipated to involve the construction of new roads, railroads, or other features that may physically divide established communities in the Specific Plan Area. No impact would occur.

c. Methodology

To determine the proposed Project's potential to conflict with any land use plan, policy, or regulation (Threshold 2), this section of the EIR analyzes the proposed Project's consistency with City and SCAG plans and policies related to land use. Adoption of the proposed Project would result in a potentially significant land use impact only if the proposed Project would conflict with one or more applicable land use plans, policies, or regulations of the City or SCAG, previously adopted for the purpose of avoiding or mitigating a regionally significant environmental impact.

d. Project Impacts

Threshold 2:	Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Impact LU-1 THE PROPOSED PROJECT WOULD BE CONSISTENT WITH SCAG'S 2024-2050 RTP/SCS GOALS AND POLICIES. THE PROPOSED PROJECT WOULD ALSO BE CONSISTENT WITH THE BMC AND BURBANK2035 GENERAL PLAN LAND USE MAP, WITH APPROVAL OF THE GENERAL PLAN LAND USE AMENDMENT AND ZONE TEXT AMENDMENT INCLUDED IN THE PROPOSED PROJECT. HOWEVER, THE PROPOSED PROJECT WOULD CONFLICT WITH POLICIES UNDER THE BURBANK2035 GENERAL PLAN RELATED TO AIR QUALITY AND WASTEWATER IMPACTS. THE PROPOSED PROJECT WOULD IMPLEMENT MITIGATION MEASURES AQ-1 AND AQ-2 TO REDUCE SHORT-TERM AND LONG-TERM CRITERIA POLLUTANTS, BUT IMPLEMENTATION WOULD NOT REDUCE EMISSIONS BELOW SCAQMD REGIONAL SIGNIFICANCE THRESHOLDS. THE PROPOSED PROJECT WOULD REQUIRE IMPLEMENTATION OF MITIGATION MEASURES UTIL-1A THROUGH UTIL-1E, AND UTIL-3A AND UTIL-3B TO REDUCE POTENTIAL IMPACTS TO WASTEWATER SYSTEM CONVEYANCE AND TREATMENT CAPACITY, BUT WOULD NOT REDUCE IMPACTS TO A LESS THAN SIGNIFICANT LEVEL WITHIN THE PROPOSED PROJECT HORIZON. THUS, IMPACTS RELATED TO CONSISTENCY WITH THE BURBANK2035 GENERAL PLAN WOULD BE SIGNIFICANT AND UNAVOIDABLE.

The proposed Project would facilitate the development of opportunity sites in the Specific Plan Area resulting in 9,702 residential units and 3,986,207 square feet of commercial and general business development, and 400 hotel rooms. The proposed Project is intended to focus on developing and implementing policies and programs to remove barriers to housing production, streamline the permitting process, and introduce objective design standards for new development within the Specific Plan Area. The proposed Project requires a zone text amendment to streamline the development process through the introduction of objective development and design standards. Additionally, to reflect that the Specific Plan Area should be a distinct and unified community with a clear vision, the Burbank2035 General Plan Land Use Map would be amended under the proposed Project to reflect just one land use designation for the Specific Plan Area: Media District Land Use, as shown in Figure 2-4 in Section 2, *Project Description*.

The following analysis provides the proposed Project's consistency with applicable land use and planning goals, policies, and ordinances within SCAG's 2024-2050 RTP/SCS, the Burbank2035 General Plan and associated elements, and the BMC.

2024-2050 RTP/SCS Consistency

As discussed above under *Regulatory Setting*, the goals of the 2024-2050 RTP/SCS that are applicable to the proposed Project focus on expanding land use and transportation strategies to increase mobility options and achieve a more sustainable growth pattern. The 2024-2050 RTP/SCS aims to balance future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health. The 2024-2050 RTP/SCS is intended to help guide transportation and land use decisions and public investments (SCAG 2024). Table 4.10-1 compares the proposed Project's consistency with the 2024-2050 RTP/SCS. As shown in Table 4.10-1, the proposed Project is consistent with all applicable 2024-2050 RTP/SCS policies and impacts related to SCAG 2024-2050 RTP/SCS consistency would be less than significant.

Table 4.10-1 Project Consistency with SCAG's RTP/SCS Policies

Goal and Policies	Consistency Analysis
Mobility: Complete Streets	
Policy 3: Pursue the development of Complete Streets that comprise a safe, multimodal network with flexible use of public rights-of-way for people of all ages and abilities using a variety of modes (e.g., people walking, biking, rolling, driving, taking transit). **Policy 4:** Ensure the implementation of Complete Streets that are sensitive to urban, suburban or rural contexts and improve transportation safety for all, but especially for vulnerable road users (e.g., people, especially older adults and children, walking and biking).	**Consistent** The proposed Project includes planned improvements to the pedestrian, bicycle, and transit infrastructure that would support the development and implementation of City's Complete Our Streets Plan. The proposed Project's pedestrian intersection improvements would primarily take place at West Olive Avenue and West Riverside Drive, West Olive Avenue and North Hollywood way, and West Alameda Avenue and Buena Vista Street. The planned improvements include high visibility crosswalks, Americans with Disabilities Act (ADA)-compliant ramps, enhanced pedestrian lighting, landscaping and shading, and curb extension or sharper curb radii. The planned pedestrian improvements would support pedestrian traffic and improve pedestrian safety at intersections. The proposed Project includes bicycle network improvements throughout the Specific Plan Area. The proposed bicycle network would integrate projects from the City's Complete Our Streets Plan and Bicycle Master Plan which are shown in Figure 7-6 of the proposed Project. The proposed bicycle network would allow for more efficient and safe travel for bicyclists throughout and surrounding the Specific Plan Area. It is anticipated that the future residents, employees, and patrons associated with the mixed-use development under the proposed Project would also benefit from the planned bus rapid transit (BRT) through use of the expanded transit options within the Specific Plan Area along West Olive Avenue, North Hollywood Way, West Alameda Avenue, and Buena Vista Street. The planned BRT route and two new stations would provide faster, more reliable public transit service throughout the Specific Plan Area and to and from the Specific Plan Area. The pedestrian, bicycle, and transit improvements envisioned in the proposed Project would also ensure that reliable, accessible, affordable, and appealing travel options are readily available. The roadway network strategies in the proposed Project include updating existing neighborhood protection plans which protect neighborhoods from non-residential traffic, roadway design improvements, and adoption of transportation demand management (TDM) programs. Implementation of the roadway network strategies would support the development of a safe, multimodal network in the Specific Plan Area. Additionally, the proposed Project includes Complete Our Streets objectives, which would integrate the Specific Plan's multimodal network into the City's transportation networks and incorporate the City's Complete Streets objective development standards into the proposed Project's development standards. Thus, the proposed Project would be consistent with these policies.
Mobility: Transit and Multimodal Integration	
Policy 7: Encourage and support the implementation of projects, both physical and digital, that facilitate multimodal connectivity, prioritize transit and shared mobility, and result in improved mobility, accessibility and safety.	**Consistent** As described under Policy 3 and 4 above, the proposed Project includes planned improvements to the pedestrian, bicycle, and transit infrastructure. The planned pedestrian improvements include high visibility crosswalks, ADA-compliant ramps, enhanced pedestrian lighting, landscaping and shading, and curb extension or sharper radii. The planned pedestrian improvements would support pedestrian traffic and improve pedestrian safety at intersections. The proposed bicycle network improvements would integrate projects from the City's Complete Our Streets Plan and Bicycle Master Plan which would allow for more efficient and safe travel for the bicyclists throughout and surrounding the Specific Plan Area. The proposed Project would also support the planned BRT route through the Specific Plan Area along West Olive Avenue, North Hollywood Way, West Alameda Avenue, and Buena Vista Street, with two new stations. The planned BRT route and stops would provide faster, more reliable public transit service throughout the Specific Plan Area and to and from the Specific Plan Area. The roadway network strategies in the proposed Project include updating existing neighborhood protection plans which protect neighborhoods from non-residential traffic, roadway design improvements, adoption of TDM programs, and careful consideration of transit stop amenities, including accessibility. Implementation of the roadway network strategies would support the development of a safe, multimodal network in the Specific Plan Area. Additionally, the proposed Project includes Complete Our Streets objectives, which plans to integrate the Specific Plan's multimodal network into the Citywide transit, pedestrian, and bicycle networks and incorporate the City's Complete Streets objective development standards into the proposed Project's development standards. Therefore, the proposed Project's pedestrian, bicycle, and transit infrastructure improvements would result in improved mobility, accessibility, and safety and the proposed Project would be consistent with this policy.
Policy 9: Encourage residential and employment development in areas surrounding existing and planned transit/rail stations.	**Consistent** Transit service in the Specific Plan is provided by multiple transit operators, including the Los Angeles County Metropolitan Transportation Authority (Metro), BurbankBus, Metrolink, Amtrak, and other local operators, with networks connecting communities within and outside of Burbank. Specifically, the Specific Plan Area includes the BurbankBus Pink Route and is surrounded by the Metro B Line, Metrolink Ventura County and Antelope Valley Lines, the BurbankBus NoHo to Airport Route, and the Amtrak Pacific Surfliner. The BurbankBus Pink Route bisects the Specific Plan Area, running along Riverside Drive, North Hollywood Way, West Olive Avenue, West Alameda Avenue and South Buena Vista Street. The majority of the proposed Project's opportunity sites would occur adjacent to the BurbankBus Pink Route. The proposed Project would provide opportunities for new housing types, including mixed-use residential development, and includes pedestrian, bicycle, and public transit improvement strategies. As further described above, the proposed Project includes planned improvements to the pedestrian, bicycle, and transit infrastructure, which would support multimodal transportation options, improve pedestrian and bicyclist safety at intersections, and provide faster, more reliable public transit service throughout the Specific Plan Area. Therefore, the proposed Project would introduce residential and employment development opportunities in areas surrounding existing and planned transit stations, and the proposed Project would be consistent with this policy.
Communities: Priority Development Areas	
Policy 32: Promote the growth of origins and destinations, with a focus on future housing and population growth, in areas with existing and planned urban infrastructure that includes transit and utilities.	**Consistent** The proposed Project would facilitate the development of opportunity sites in the Specific Plan Area resulting in 9,702 residential units, 3,986,207 square feet of commercial uses, and 400 hotel rooms. As detailed above, transit service in the Specific Plan Area includes the BurbankBus Pink Route and transit service near the Specific Plan Area includes the Metro B Line, Metrolink Ventura County and Antelope Valley Lines, the BurbankBus NoHo to Airport Route, and the Amtrak Pacific Surfliner. The BurbankBus Pink Route bisects the Specific Plan Area, running along Riverside Drive, North Hollywood Way, West Olive Avenue, West Alameda Avenue and South Buena Vista Street. The majority of the proposed Project's opportunity sites would occur adjacent to the BurbankBus Pink Route. As further described above, the proposed Project includes planned improvements to the pedestrian, bicycle, and transit infrastructure, which would support multimodal transportation options, improve pedestrian and bicyclist safety at intersections, and provide faster, more reliable public transit service throughout the Specific Plan Area. Although all parcels in Burbank have access to existing public utility infrastructure, in some cases the infrastructure is older and in need of replacement or insufficient to meet the needs of a particular project. Pursuant to Burbank2035 General Plan Land Use Policy 2.3, new development projects under the proposed Project would be required to pay for their share of upgrading the utility infrastructure as needed to serve their project. One of the primary goals of the proposed Project is to encourage residential and commercial growth near major transportation corridors. Therefore, the proposed Project would introduce housing development in areas with existing and planned urban infrastructure, and the proposed Project would be consistent with this policy.

Goal and Policies	Consistency Analysis
Policy 33: Promote the growth of origins and destinations, in areas with a proclivity toward multimodal options like transit and active transportation, to reduce single occupant vehicle (SOV) dependency and vehicle miles traveled (VMT).	**Consistent** The proposed Project would provide opportunities for new housing types, including mixed-use residential development, and includes pedestrian, bicycle, and public transit improvement strategies that would promote development in areas with a proclivity toward multimodal options, reducing SOV dependency and VMT. The roadway network strategies in the proposed Project include updating existing neighborhood protection plans, which protect neighborhoods from non-residential traffic, roadway design improvements, and adoption of TDM programs. Implementation of the roadway network strategies would support the development of a safe, multimodal network in the Specific Plan Area, reducing SOV dependency and VMT. As detailed in Section 4.15, *Transportation*, of this EIR, the proposed Project would reduce total VMT per service capita by 32.2 percent and home-based VMT per capita by 29.3 percent, that would both exceed the required 15-percent reduction threshold. The proposed Project would only reduce home-based work VMT per employee by 4.3 percent, which falls short of the required 15-percent reduction threshold, resulting in a significant and unavoidable VMT impact. Although the proposed Project would result in a significant and unavoidable impact related to VMT, the proposed Project would reduce VMT for each VMT type. Therefore, the proposed Project would be consistent with this policy.
Communities: Housing the Region	
Policy 35: Encourage housing development in areas with access to important resources and amenities (economic, educational, health, social and similar) to further fair housing access and equity across the region.	**Consistent** The proposed Project involves land use regulations and land development policies that are intended to facilitate the development of underutilized opportunity sites within the Specific Plan Area, which create opportunities for higher development intensity and the potential for adaptive reuse. These sites are referred to as opportunity sites and would assist in meeting the City's goals of introducing affordable housing, promoting infill development, and catalyzing economic development in proximity to existing employment centers and envisioned transit centers and corridors. One of the primary goals of the proposed Project is to encourage residential and commercial growth near major transportation corridors. Therefore, the proposed Project would introduce housing development in areas with access to important resources and the proposed Project would be consistent with this policy.
Policy 36: Encourage housing development in transit-supportive and walkable areas to create more interconnected and resilient communities.	**Consistent** The proposed Project would provide opportunities for new housing types, including mixed-use residential development, and includes pedestrian, bicycle, and public transit improvement strategies. One of the primary goals of the proposed Project is to encourage residential and commercial growth near major transportation corridors. As further described above, the proposed Project includes planned improvements to the pedestrian, bicycle, and transit infrastructure. The planned pedestrian, bicycle, and transit improvements would support multimodal transportation options, improve pedestrian and bicyclist safety at intersections, and provide faster, more reliable public transit service throughout the Specific Plan Area. Therefore, the proposed Project would introduce housing development in transit-supportive and walkable areas, and the proposed Project would be consistent with this policy.
Policy 37: Support local, regional, state and federal efforts to produce and preserve affordable housing while meeting additional housing needs across the region.	**Consistent** The proposed Project involves development of underutilized opportunity sites within the Specific Plan Area as opportunities for infill and adaptive reuse. These opportunity sites would assist in meeting the City's goals of introducing affordable housing, promoting infill development, and catalyzing economic development in proximity to existing employment centers and envisioned transit centers and corridors. One of the primary goals of the proposed Project is to encourage affordable and workforce housing development in the Specific Plan Area. Section 10, *Implementation*, of the proposed Project details the funding sources and mechanisms that would be utilized to implement the proposed Project, specifically related to affordable housing. Therefore, the proposed Project would be consistent with this policy.
Communities: 15-Minute Communities	
Policy 42: Promote 15-minute communities as places with a mix of complementary land uses and accessible mobility options that align with and support the diversity of places (or communities) across the region. These are communities where residents can either access their most basic, day-to-day needs within a 15-minute walk, bike ride or roll from their home or as places that result in fewer and shorter trips because of the proximity of complementary land uses.	**Consistent** The proposed Project involves development of underutilized opportunity sites within the Specific Plan Area as opportunities for infill and adaptive reuse. These sites are referred to as opportunity sites and would assist in meeting the City's goals of introducing affordable housing, promoting infill development, and catalyzing economic development in proximity to existing employment centers and envisioned transit centers and corridors. As further described above, the proposed Project includes planned improvements to the pedestrian, bicycle, and transit infrastructure that would support multimodal transportation options, improve pedestrian and bicyclist safety at intersections, and provide faster, more reliable public transit service throughout the Specific Plan Area. The proposed Project's planned pedestrian, bicycle, and transit improvements would support the development of the Specific Plan Area as a 15-minute community. The vision of the proposed Project promotes development of high-density land uses near transit and scaled down densities further from transit; thereby supporting the development of the Specific Plan Area as a 15-minute community. Therefore, the proposed Project would be consistent with this policy.
Environment: Natural and Agricultural Lands Preservation	
Policy 61: Encourage the protection and restoration of natural habitat and wildlife corridors.	**Consistent** The Specific Plan Area does not include any documented sensitive natural communities, including wetlands or riparian habitats. Any future development projects under the proposed Project would occur in urbanized areas and, therefore, would not directly or indirectly impact sensitive natural communities. As concluded in Section 4.19, *Effects Found Not to be Significant*, of this EIR, the Specific Plan Area is urbanized, and as such, there are no known regional wildlife habitat linkages or described wildlife movement within the Specific Plan Area and impacts would be less than significant. Therefore, the proposed Project would be consistent with this policy.

General Plan Consistency

The following analysis in Table 4.10-2 discusses the proposed Project's consistency with applicable goals and policies in the Burbank2035 General Plan. Approval of the proposed Project would include a General Plan Amendment to amend the land use designation in the Land Use Element, resolution to adopt the proposed Project, and a corresponding zone text amendment to be consistent with the General Plan and incorporate the Specific Plan development standards. The proposed Project would generally be consistent with the Burbank2035 General Plan. However, the following inconsistencies have been identified:

Air Quality and Climate Change Element

As described under the consistency analysis for Policy 1.2 and 1.5 of the Air Quality and Climate Change Element in Table 4.10-2, development associated with the proposed Project would generate short-term and long-term criteria air pollutant emissions in exceedance of short-term and long-term SCAQMD regional thresholds and would expose sensitive receptors to substantial pollutant concentrations. The proposed Project would implement Mitigation Measures AQ-1 and AQ-2 to reduce short-term and long-term criteria pollutants, but implementation would not reduce emissions below SCAQMD regional significance thresholds. Therefore, the proposed Project would not be consistent with these Burbank2035 General Plan policies, which would result in a significant and unavoidable impact.

Land Use Element

As discussed under the consistency analysis for Policy 2.3 of the Land Use Element in Table 4.10-2, development under the proposed Project would result in additional wastewater flows that would exceed the existing capacity for wastewater and would require substantial facility improvements to accommodate the exceedance. As described in Section 4.17, *Utilities and Service Systems*, potential future improvements to increase the treatment capacity of the BWRP would require upgrades to the headworks, the addition of new primary clarifiers, modifications to the secondary treatment process, and expansion of the equalization basins (beyond the near-term 10-year planning horizon). Additionally, BWRP expansion would likely require the City to acquire new land to build some of these improvements due to limited space in the current BWRP property. No feasible mitigation exists to reduce potential wastewater capacity exceedance impacts to a level of less than significant within the proposed Project's horizon. Therefore, the proposed Project would not be consistent with this Burbank2035 General Plan policy, which would result in a significant and unavoidable impact.

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Table 4.10-2 Project Consistency with Applicable General Plan Goals and Policies

Goal/Policy	Project Consistency
Air Quality and Climate Change Element	
Goal 1: Reduction of Air Pollution: The health and sustainability of the city, county, and Basin are improved by planning and programs that reduce air pollutants. Policies that reduce fossil fuel combustion (by reducing vehicle miles traveled and promoting conservation and use of renewable energy) lessen adverse impacts on both air quality and climate change.	
Policy 1.1: Coordinate air quality planning efforts with local, regional, state, and federal agencies, and evaluate the air quality effects of proposed plans and development projects.	**Consistent** The proposed Project plans for 9,702 residential units and 3,986,207 square feet of commercial and general business development, and 400 hotel rooms, which would introduce air pollutant emissions associated with area sources, energy sources, and mobile sources. As described in Section 4.2, *Air Quality*, of this EIR, larger projects under the proposed Project may exceed short-term and long-term SCAQMD regional air pollutant thresholds which would expose sensitive receptors to substantial pollutant concentrations. Future development projects under the proposed Project would be subject to compliance with applicable SCAQMD rules related to air quality, and larger project that meet the criteria described in Section 4.2, *Air Quality*, would be required to implement Mitigation Measures AQ-1 and/or AQ-2, which require the preparation of project-specific air quality analysis prior to the construction and operation periods, respectively. The required project-specific air quality analyses would include analysis of applicable standards and regulations of federal, State, and regional agencies such as the U.S. EPA, CARB, SCAQMD, and the Clean Air Act. Thus, upon compliance with applicable regulations and mitigation, development under the proposed Project would be consistent with this policy.
Policy 1.2: Seek to attain or exceed the more stringent of federal or State ambient air quality standards for each criteria air pollutant.	**Inconsistent** As described in Section 4.2, *Air Quality*, of this EIR, development associated with the proposed Project would generate short-term criteria air pollutant emissions associated with use of heavy-duty construction equipment; truck trips hauling debris, soils, and construction materials; and fugitive dust from demolition and grading. Additionally, long-term air pollutant emissions would result from mobile sources (i.e., motor vehicle exhaust), energy use (i.e., natural gas combustion), stationary sources (e.g., emergency generators, fire pumps, and boilers) and area sources (e.g., hearths, landscaping equipment, consumer products, and architectural coatings). As described in Section 4.2, *Air Quality*, of this EIR, large projects under the proposed Project would exceed short-term and long-term SCAQMD regional thresholds. Development projects under the proposed Project would be required to implement Mitigation Measures AQ-1 and AQ-2 to reduce short-term and long-term criteria pollutants, but implementation would not reduce emissions below SCAQMD regional significance thresholds. Thus, impacts related to criteria air pollutants would be significant and unavoidable and the proposed Project would be inconsistent with this policy.
Policy 1.4: Cooperate with the U.S. Environmental Protection Agency (EPA), the California Air Resources Board (ARB), and the South Coast Air Quality Management District (SCAQMD) to measure air quality at emission sources (including transportation corridors), and enforce the provisions of the Clean Air Act, as well as State and regional policies and established standards for air quality.	**Consistent** The proposed Project plans for 9,702 residential units and 3,986,207 square feet of commercial and general business development, and 400 hotel rooms, which would introduce air pollutant emissions associated with area sources, energy sources, and mobile sources. As described in Section 4.2, *Air Quality*, of this EIR, larger projects under the proposed Project may exceed short-term and long-term SCAQMD regional air pollutant thresholds which would expose sensitive receptors to substantial pollutant concentrations. Future development projects under the proposed Project would be subject to compliance with applicable SCAQMD rules related to air quality, and larger projects that meet the criteria described in Section 4.2, *Air Quality*, would be required to implement Mitigation Measures AQ-1 and/or AQ-2, which require the preparation of project-specific air quality analysis during the construction and operation periods, respectively. The required project-specific air quality analyses would include analysis of applicable standards and regulations of federal, State, and regional agencies such as the U.S. EPA, CARB, SCAQMD, and the Clean Air Act. Thus, upon compliance with applicable regulations and mitigation, development under the proposed Project would be consistent with this policy.
Policy 1.5: Require projects that generate potentially significant levels of air pollutants, such as landfill operations or large construction projects, to incorporate best available air quality and greenhouse gas mitigation in project design.	**Inconsistent** As described in Section 4.2, *Air Quality*, of this EIR, large projects under the proposed Project may exceed short-term and long-term SCAQMD regional criteria pollutant thresholds which would expose sensitive receptors to substantial pollutant concentrations. The development projects that meet the criteria for further analysis would be required to implement Mitigation Measures AQ-1 and AQ-2 to reduce short-term and long-term criteria pollutants and substantial pollutant concentrations, but implementation would not reduce emissions below SCAQMD regional significance thresholds. Thus, impacts related to air pollutants would be significant and unavoidable and the proposed Project would be inconsistent with this policy.
Policy 1.6: Require measures to control air pollutant emissions at construction sites and during soil-disturbing or dust-generating activities (i.e., tilling, landscaping) for projects requiring such activities.	**Consistent** Future development projects under the proposed Project would be subject to compliance with applicable SCAQMD rules, including Rule 401 (Visible Emissions), Rule 402 (Nuisance), Rule 403 (Fugitive Dust), and Rule 1113 (Architectural Coatings). Specifically, Rule 403 requires the use of best available control measures for all construction activities to reduce fugitive dust emissions. The major construction elements addressed by Rule 403 include earth moving, disturbed surface areas, unpaved roads, open storage piles, demolition, and other various construction activities. Rule 403 compliance by individual property owners, developers, and/or contractors would reduce temporary construction-related air pollutant emissions of fugitive dust. Larger future development projects under the proposed Project that meet the criteria for implementation of Mitigation Measure AQ-1, as described in Section 4.2, *Air Quality*, of this EIR, would be required to implement the applicable construction air pollutant emission reduction measures. Thus, the proposed Project would be consistent with this policy.
Policy 1.9: Encourage the use of zero-emission vehicles, low-emission vehicles, bicycles, and other non-motorized vehicles, and car-sharing programs. Consider requiring sufficient and convenient infrastructure and parking facilities in residential developments and employment centers to accommodate these vehicles.	**Consistent** The proposed Project aims to facilitate development in the Specific Plan Area through a combination of infill, mixed-use development, and transit-oriented growth strategies. These growth strategies include identifying underutilized parcels as opportunity sites, concentrating development along transit corridors, and improving pedestrian, bicycle, and non-vehicular infrastructure. The parking strategies in the proposed Project include utilizing curbs, which can include electric vehicle charging. Policy 7.2 of the proposed Project aims to design commercial and residential parking standards to limit new vehicle trips, incentivize transit use, and promote non-motorized transportation. The proposed objective design standards include minimum off-street bicycle parking for development projects within the Specific Plan Area. Implementation of the parking strategies and Policy 7.2 would ensure that an adequate parking supply in the Specific Plan Area is maintained. Thus, the proposed Project would encourage the use of zero-emission vehicles, low-emission vehicles, bicycles, and other non-motorized vehicles and the proposed Project be consistent with this policy.

Goal/Policy	Project Consistency
Goal 2: Sensitive Receptors: Burbank is committed to reducing the exposure of sensitive receptors to toxic air contaminants and odors.	
Policy 2.2: Separate sensitive uses such as residences, schools, parks, and day care facilities from sources of air pollution and toxic chemicals. Provide proper site planning and design features to buffer and protect when physical separation of these uses is not feasible.	**Consistent** The Specific Plan Area consists of sensitive receptors, such as residential uses, schools, parks, and medical facilities. Air pollution and toxic chemicals emitted from construction may temporarily impact sensitive receptors; however, the proposed Project would require additional analysis and application of appropriate mitigation for each future development project that meets the criteria for implementation of Mitigation Measures AQ-1 and AQ-2, as described in Section 4.2, *Air Quality*, of this EIR. Generally, agencies are not required to analyze the impact of existing environmental conditions on a project's future users or residents, unless the proposed project risks exacerbating those environmental hazards or conditions that already exist. (California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369). However, pursuant to Burbank2035 General Plan Program AQCC-4, Health Risk Assessments for Stationary and Mobile Sources, a health risk assessment was completed to evaluate potential impacts associated with emissions in proximity to proposed residential developments under the proposed Project. The assessment concluded that construction activities associated with the future projects would result in potential exposure to high concentrations of NO_2 that may induce adverse health effects such as breathing difficulties. During operation of the proposed Project, future developments may result in higher concentrations of toxic air contaminants from SR-134. The primary concern for sensitive receptors near the SR-134 is diesel particulate matter (PM), combined with other vehicle exhaust pollutants; however, the project does not include specific residential designs and unit locations, and it is possible that future development would be designed to result in less impacts than anticipated by the health risk assessment. Future development within the Specific Plan Area would be required to follow Policy 2.2 and provide proper site planning and design features to reduce exposure to air pollution generated from roadways and other toxic chemical producers. In addition, the reasonably foreseeable development under the proposed Project would be required to include minimum efficiency reporting value (MERV) 13 filters in the building ventilation systems, pursuant to the 2022 California Energy Code Subchapter 3, Section 120.1(c) and Subchapter 10, Section 160.2(c). While health risks associated with an increase in residential development near major roadways would increase with the proposed project, according to the health risk assessment, with inclusion of MERV 13 filters, opportunity sites proposed in the Specific Plan within 500 feet of the SR-134 would not exceed the Maximum Exposed Individual Resident threshold for cancer risks, chronic risks, and acute risks. Therefore, the proposed Project would be consistent with this policy.
Policy 2.3: Require businesses that cause air pollution to provide pollution control measures.	**Consistent** As detailed in Section 4.2, *Air Quality*, of this EIR, Mitigation Measure AQ-1 would require that large projects under the proposed Project prepare an air quality impact analysis which may include the requirement of use of off-road equipment that meets the United States Environmental Protection Agency's Tier 4 emission standards and equipment outfitted with the best available control technology devices certified by CARB. Mitigation Measure AQ-2 would also require that large projects under the proposed Project prepare an air quality impact analysis which may include the requirement of a transportation demand management plan, use of all electric appliances, use of solar or low emission water heaters, increased insultation, and use of electric lawn mowers, leaf blowers, and chainsaws. Thus, with implementation of Mitigation Measures AQ-1 and AQ-2, the proposed Project would be consistent with this policy.
Policy 2.4: Reduce the effects of air pollution, poor ambient air quality, and urban heat island effect with increased tree planting in public and private spaces.	**Consistent** The proposed Project would require that individual projects developed under the Specific Plan would comply with the City's Green Streets policy which promotes green infrastructure. Green Streets is defined by the City in BMC Section 7-3-102 as, "Improvements within the public and private transportation corridors that provide source control of storm water, limit its transport and pollutant conveyance to the collection system, restore predevelopment hydrology to the extent possible, and provide environmentally enhanced roads by incorporating a wide variety of design elements including but not limited to, street trees, sustainable pavements, bioretention, and swales, and are designed to reduce greenhouse gases (GHG), energy consumption during construction, and promote recycling of natural resources." The proposed Project specifies that the Green Streets Policy shall apply to new streets and road construction of 10,000 square feet or more of impervious surface area, and street and road redevelopment that results in the creation, addition, or replacement of 5,000 square feet or more of impervious surface area on an already developed site. The proposed Project would introduce street trees, sustainable pavements, bioretention, and swales in compliance with the Green Street Policy, to reduce air pollution and GHG emissions. Therefore, the proposed Project would be consistent with this policy.
Policy 2.5: Require the use of recommendations from the California Air Resources Board's Air Quality and Land Use Handbook to guide decisions regarding location of sensitive land uses.	**Consistent** The Specific Plan Area consists of sensitive receptors, such as residential uses, schools, parks, and medical facilities. Air pollution and toxic chemicals emitted from construction may temporarily impact sensitive receptors; however, the proposed Project would require implementation of mitigation measures as described in the analysis under Air Quality and Climate Change Element Goal 1 (Reduction of Air Pollution) Policy 1.6. A health risk assessment was completed to evaluate potential impacts associated with emissions in proximity to proposed residential developments under the proposed Project. The assessment concluded that construction activities associated with future projects would result in potential exposure to high concentrations of NO_2 that may induce adverse health effects such as breathing difficulties. During operation of the future projects, air emissions associated with SR-134 may result in higher concentrations of toxic air contaminants. The primary concern for sensitive receptors near the SR-134 is exposure to diesel PM, combined with other vehicle exhaust pollutants; however, the project does not include specific residential designs and unit locations, and it is possible that future development would be designed to result in less impacts than anticipated by the health risk assessment. Future development within the Specific Plan Area would be required to follow Policy 2.2 and provide proper site planning and design features to reduce exposure to air pollution generated from roadways and other toxic chemical producers. While health risks associated with an increase in residential development near major roadways would increase with the proposed project, according to the health risk assessment, opportunity sites proposed in the Specific Plan within 500 feet of the SR-134 would not exceed the Maximum Exposed Individual Resident threshold for cancer risks, chronic risks, and acute risks. Therefore, the proposed Project would be consistent with this policy.

Goal/Policy	Project Consistency
Goal 3: Reduction of Greenhouse Gas Emissions: Burbank seeks a sustainable, energy-efficient future and complies with Statewide greenhouse gas reduction goals.	
Policy 3.4: Reduce greenhouse gas emissions from new development by promoting water conservation and recycling; promoting development that is compact, mixed-use, pedestrian-friendly, and transit-oriented; promoting energy-efficient building design and site planning; and improving the jobs/housing ratio.	**Consistent** The proposed Project would comply with the Burbank2035 Greenhouse Gas Reduction Plan (GGRP), which establishes a target for Burbank to reduce communitywide GHG emissions by at least 30 percent from 2010 baseline levels by 2035. The proposed Project would accommodate construction of housing in locations with convenient access to jobs, services, and public transit, which inherently reduces dependence on motor vehicles and overall emissions from transportation. Additionally, future development projects under the proposed Project would be serviced by BWP, which plans to transition to 100 percent renewable energy by 2040. Future development projects would also be required to comply with Title 24 standards, including the California Green Building Standards (CALGreen) Code, which promotes energy-efficient building design and site planning. The proposed Project would introduce 9,702 housing units to the Specific Plan Area, which would support the City's goal of increasing housing to improve the jobs/housing ratio. One of the primary goals of the proposed Project is to encourage affordable and workforce housing development in the Specific Plan Area. Therefore, the proposed Project would be consistent with this policy.
Land Use Element	
Goal 1: Quality of Life: Burbank maintains a high quality of life by carefully balancing the needs of residents, businesses, and visitors.	
Policy 1.1: Accommodate a mix of residential and non-residential land uses in appropriate locations that support the diverse needs of Burbank residents, businesses, and visitors. Provide opportunities for living, commerce, employment, recreation, education, culture, entertainment, civic engagement, and socializing.	**Consistent** The proposed Project would provide the framework for transit-oriented mixed-use development within the Specific Plan Area that would support the diverse needs of Burbank's residents, businesses, and visitors. The proposed Project would include high and medium density residential and commercial land uses. The primary goals of the proposed Project are to develop streetscapes and buildings that are sensitive to the surrounding development's intensity and scale and to establish design standards which would ensure neighborhood compatibility. Therefore, the proposed Project would be consistent with this policy.
Policy 1.2: With discretionary approval, allow for the density and intensity limits specified in Burbank2035 to be exceeded for transit-oriented development projects within transit centers as identified in the Mobility Element. The density and intensity limits may be exceeded by no more than 25%.	**Consistent** With approval of the requested discretionary actions, the proposed Project would be consistent with Policy 1.2 by allowing a residential density bonus of up to 25 percent for transit oriented development under the proposed Project. The Project would, therefore, be consistent with this policy.
Policy 1.3: Maintain and protect Burbank's residential neighborhoods by avoiding encroachment of incompatible land uses and public facilities.	**Consistent** One of the Projects three overarching goals is to promote contextual development. The proposed Project achieves this through carefully regulating a variety of land uses, and strategically identifies housing opportunity sites to minimize encroachment of incompatible land uses and public facilities. To support the goal of contextual development, the Project introduces community driven objective development standard that will result in streetscapes and buildings that are sensitive to the surrounding development's intensity and scale and to establish design standards which would ensure neighborhood compatibility. The proposed Project would, therefore, be consistent with this policy.
Policy 1.4: With discretionary approval, allow for the density and intensity limits to be exceeded, by no more than 25%, for exceptional projects that advance the goals and policies of Burbank2035.	**Consistent** With approval of the requested discretionary actions, the proposed Project would be consistent with Policy 1.2 by allowing a residential density bonus of up to 25 percent for exceptional projects under the proposed Project that advance the goals and policies of the Burbank2035 General Plan. The proposed Project would, therefore, be consistent with this policy.
Policy 1.8: Ensure that development in Burbank is consistent with the land use designations presented in the Land Use Plan and shown on the Land Use Diagram, including individual policies applicable to each land use designation.	**Consistent** Project adoption would include a General Plan Amendment that would amend the land use designations in the Land Use Element. The proposed Project currently includes a variety of land use designations, including Corridor Commercial, Media District Commercial, Medium Density Residential, and High Density Residential and strategically identifies housing opportunity sites to minimize encroachment of incompatible land uses and public facilities. As detailed in Section 2, *Project Description*, of this EIR, the proposed Project would strategically revise the allowed uses, floor area ratio, density, and to promote context sensitivity to lower scaled land uses. The primary goals of the proposed Project are to promote contextual development by facilitating streetscapes and buildings that are sensitive to the surrounding development's intensity and scale and to establish objective design standards, which would ensure neighborhood compatibility and development. Therefore, with approval of the General Plan Amendment, the proposed Project would be consistent with this policy.
Goal 2: Sustainability: Burbank is committed to building and maintaining a community that meets today's needs while providing a high quality of life for future generations. Development in Burbank respects the environment and conserves natural resources.	
Policy 2.3: Require that new development pay its fair share for infrastructure improvements. Ensure that needed infrastructure and services are available prior to or at project completion.	**Inconsistent** As discussed in Section 4.17, *Utilities and Service Systems*, to the extent that improvements to infrastructure are required for implementation of the proposed Project (i.e., sewer and water connections), a project applicant shall be required to pay applicable development impact and public utility fees and comply with applicable regulations pursuant to the BMC to the satisfaction of the City Building Official and the City Engineer. However, the proposed Project would result in additional wastewater flows that would exceed the existing capacity for wastewater and would require substantial facility improvements to accommodate the exceedance. As described in Section 4.17, *Utilities and Service Systems*, of this EIR, potential future improvements to increase the treatment capacity of the BWRP would require upgrades to the headworks, the addition of new primary clarifiers, modifications to the secondary treatment process, and expansion of the equalization basins (beyond the near-term 10-year planning horizon). Additionally, BWRP expansion would likely require the City to acquire new land to build some of these improvements due to limited space in the current BWRP property. The proposed Project would require implementation of Mitigation Measures UTIL-1a through UTIL-1e, and UTIL-3a through UTIL-3b to reduce potential impacts to wastewater system conveyance and treatment capacity, but would not reduce impacts to a less than significant level within the proposed Project's planning horizon. Impacts to wastewater would be significant and unavoidable, and the proposed project would not be consistent with this policy.

Goal/Policy	Project Consistency
Policy 2.4: Provide public facilities and services in the most equitable and efficient manner possible.	**Consistent** As discussed in Section 4.13, *Public Services*, to the extent that future development projects under the proposed Specific Plan would require use of public services and facilities (i.e., schools, libraries, police and fire) or require improvements to such public facilities, the applicant for each future development project would be required to pay applicable fair-share developer impact and developer school fees and comply with all applicable regulations pursuant to the BMC. The proposed Project would, therefore, be consistent with this policy.
Policy 2.5: Require the use of sustainable construction practices, building infrastructure, and materials in new construction and substantial remodels of existing buildings.	**Consistent** Any future development projects under the proposed Specific Plan would comply with the CALGreen Code requirements, which consist of standards related to building construction, such as receiving approval of a Title 24 Compliance Report for new construction and major renovations within the Specific Plan Area and ensuring at least 65 percent of construction waste is diverted from landfills. The proposed Project would implement these sustainable construction practices and materials. Therefore, the proposed Project would be consistent with this policy.
Policy 2.6: Design new buildings to minimize the consumption of energy, water, and other natural resources. Develop incentives to retrofit existing buildings for a net reduction in energy consumption, water consumption, and stormwater runoff.	**Consistent** As discussed in Section 4.17, *Utilities and Service Systems*, future development projects under the proposed Project would utilize sustainable construction practices and would be designed to comply with current CALGreen Code requirements, as well as regulations that would assist in achieving the goals of the Burbank2035 General Plan related to energy efficiency and overall energy reduction. The water consumption strategies in the proposed Plan include incorporation of sustainable stormwater management features and utilization of recycled water for landscaping. Implementation of the water consumption strategies would result in a net reduction in water consumption and stormwater runoff. Therefore, the proposed Project would be consistent with this policy.
Goal 3: Community Design and Character: Burbank's well-designed neighborhoods and buildings and enhanced streets and public spaces contribute to a strong sense of place and "small town" feeling reflective of the past.	
Policy 3.1: Recognize neighborhoods and districts as the building blocks of the community.	**Consistent** The proposed Project would implement objective, transit-supportive development and design standards that would result in more efficient use of land area and provide a sense of place. The character of each neighborhood, district, or corridor within the Specific Plan Area is determined by the set of uses and activities that occur within each. The proposed Project outlines design standards, which detail the form of buildings and how they face and interact with the street, as well as how they are accessed; the design of the streets, streetscape, and sidewalks that provide access to them; the form, location, type, and access to parking; and the form and type of open space (streets, parks, paseos, and plazas). The proposed Project aims to preserve and otherwise create distinct and well-connected neighborhoods, districts, and corridors. Therefore, the proposed Project would be consistent with this policy.
Policy 3.2: Preserve unique neighborhoods and use specific plans to distinguish neighborhoods and districts by character and appearance and address physical and visual distinction, architecture, edge and entry treatment, landscape, streetscape, and other elements.	
Policy 3.3: Maintain a healthy balance between Burbank's urban setting and its suburban roots by avoiding urban-scale residential densities and intensities in inappropriate locations, and recognizing advantages of denser development at appropriate locations.	**Consistent** The proposed Project aims to create the framework to provide a transit-oriented mixed-use development within Specific Plan Area that consists of a variety of compatible land uses, including multi-media studios, residences, schools, medical facilities, and parks, that would vary in density and height. The proposed Project aims to augment existing land uses policies and regulations to facilitate the introduction of housing and other beneficial non-residential uses, while ensuring that new development contributes to the creation of a pedestrian-friendly environment that provides Burbank's unique sense of place. The proposed Project would provide a mix of land uses and development standards in the Specific Plan Area that would support the diverse needs of Burbank's residents, businesses, and visitors while protecting the urban scale. Therefore, the proposed Project would be consistent with this policy.
Policy 3.4: Avoid abrupt changes in density, intensity, scale, and height and provide gradual transitions between different development types.	**Consistent** The proposed Project aims to create the framework to provide a transit-oriented mixed-use development within Specific Plan Area that consists of a variety of compatible land uses, including multi-media studios, residences, schools, medical facilities, and parks, that would vary in density and height. The primary goals of the proposed Project are to develop streetscapes and buildings that are sensitive to the surrounding development's intensity and scale and to establish design standards that would ensure neighborhood compatibility and development. The proposed Project would implement various development standards for private development, that aid in creating a transition from each neighborhood, district, and corridor; therefore, avoiding abrupt changes in density, intensity, scale, and height. Improvements to the public realm of the Specific Plan Area focus on pedestrian-scaled amenities, such as improved sidewalks, street trees and complete street plans, lighting, and street furniture. The development standards also provide street and block standards designed to mitigate the size of mega blocks through the introduction of pedestrian-scaled streets and blocks that are consistent in scale with those of the Specific Plan Area and the neighborhoods that surround it. Therefore, the proposed Project would be consistent with this policy.
Policy 3.5: Ensure that architecture and site design are high quality, creative, complementary to Burbank's character, and compatible with surrounding development and public spaces.	**Consistent** As discussed under the consistency analysis for Land Use Element Policy 3.4, the proposed Project includes development standards that all new development within the Specific Plan Area must adhere to, consistent with the policies outlined in the General Plan Land Use Element. Therefore, the proposed Project would be consistent with this policy.
Policy 3.6: Carefully regulate signs to ensure that their size and location are attractive, are appropriate for the site, and appropriately balance visibility needs with community character and aesthetics.	**Consistent** Future development under the proposed Project would be required to adhere to Title 10, Chapter 1, Article 10, Sign and Advertising Structure Regulations, of the BMC, which regulates size, location, and type for signage in Burbank. Future development under the proposed Project would be subject to zoning consistency review, pursuant to the satisfaction of the City of Burbank, to ensure that signage appropriately balances visibility needs with community character and aesthetics. The proposed Project would, therefore, be consistent with this policy.

Goal/Policy	Project Consistency
Goal 4: Public Spaces and Complete Streets: Burbank has attractive and inviting public spaces and complete streets that enhance the image and character of the community.	
Policy 4.1: Develop complete streets that create functional places meeting the needs of pedestrians, bicyclists, wheelchair users, equestrians, and motorists.	**Consistent** The proposed Project includes planned improvements to the pedestrian, bicycle, and transit infrastructure. The proposed Project's pedestrian intersection improvements would primarily take place along West Olive Avenue and West Riverside Drive, West Olive Avenue and North Hollywood way, and West Alameda Avenue and Buena Vista Street. The planned improvements include high visibility crosswalks, ADA-compliant ramps, enhanced pedestrian lighting, landscaping and shading, and curb extension or sharper radii. The planned pedestrian improvements would support pedestrian traffic and improve pedestrian safety at intersections. The proposed Project also includes bicycle network improvements throughout the Specific Plan Area. The proposed bicycle network would integrate projects from the City's Complete Our Streets Plan and Bicycle Master Plan. The bicycle network improvements are shown in Figure 6-7 of proposed the Specific Plan. The proposed bicycle improvements would allow for more efficient and safe travel for the bicyclists throughout and surrounding the Specific Plan Area. Additionally, the proposed Specific Plan includes Complete Our Streets objectives, which plans to integrate the proposed Project's multimodal network into the Citywide transit, pedestrian, and bicycle networks and incorporate the City's Complete Streets objective development standards into the proposed Project's development standards. The proposed Project accommodates a planned BRT route through the Specific Plan Area along West Olive Avenue, North Hollywood Way, West Alameda Avenue, and Buena Vista Street, with two new stations. The planned BRT route and stops would provide faster, more reliable public transit service throughout the Specific Plan Area and to and from the Specific Plan Area. Therefore, the proposed Project would be consistent with this policy.
Policy 4.3: Use street trees, landscaping, street furniture, public art, and other aesthetic elements to enhance the appearance and identity of neighborhoods and public spaces. **Policy 4.5:** Require that pedestrian-oriented areas include amenities such as sidewalks of adequate width, benches, street trees and landscaping, decorative paving, public art, kiosks, and restrooms.	**Consistent** The proposed Project includes planned improvements to the pedestrian infrastructure. The proposed Project's pedestrian intersection improvements would primarily take place along West Olive Avenue and West Riverside Drive, West Olive Avenue and North Hollywood way, and West Alameda Avenue and Buena Vista Street. The planned improvements include high visibility crosswalks, ADA-compliant ramps, enhanced pedestrian lighting, landscaping and shading, and curb extension or sharper radii, which would support pedestrian traffic and improve pedestrian safety at intersections. Additionally, the proposed Specific Plan includes Complete Our Streets objectives, which plans to integrate the proposed Project's multimodal network into the Citywide transit, pedestrian, and bicycle networks and incorporate the City's Complete Streets objective development standards into the proposed Project's development standards. The proposed Project outlines design standards that detail the form of buildings and how they face and interact with the street, as well as how they are accessed; the design of the streets, streetscape, and sidewalks that provide access to them; the form, location, type, and access to parking; and the form and type of open space (streets, parks, paseos, and plazas). Accordingly, these planned improvements in the proposed Project would enhance the appearance of the Specific Plan Area. Therefore, the proposed Project would be consistent with these policies.
Policy 4.10: Require new development projects to provide adequate low-water landscaping.	**Consistent** Policy 3 of the proposed Specific Plan would ensure the use of recycled water for landscaping. Furthermore, pursuant to BMC Section 10-1-1418, *Landscaping*, future development projects under the proposed Specific Plan would be required to have a minimum of 10 percent of landscaping around open parking areas and comply with the provisions of AB 1881, Model Water Efficient Landscaping Ordinance, which requires efficient landscape design, installation, management, and maintenance. Therefore, the proposed Project would be consistent with this policy.
Goal 5: Housing: Burbank provides housing options for people and families with diverse needs and resources.	
Policy 5.1: Provide for a variety of residential neighborhoods with varying densities and housing types	**Consistent** The proposed Project would facilitate the development of opportunity sites in the Specific Plan Area resulting in 9,702 residential units and 3,986,207 square feet of commercial and general business development, and 400 hotel rooms. This development would include medium density residential, high density residential, mixed-used residential, and commercial developments. The City identified groupings of underutilized sites within the Specific Plan Area as opportunities for infill and adaptive reuse. These opportunity sites would assist in meeting the City's goals of introducing affordable housing, promoting infill development, and catalyzing economic development in proximity to existing employment centers and envisioned transit centers and corridors. The primary goals of the proposed Project are to develop streetscapes and buildings that are sensitive to the surrounding development's intensity and scale and to establish design standards, which would ensure neighborhood compatibility. Therefore, the proposed Project would be consistent with this policy.
Policy 5.2: Encourage areas of mixed-density and mixed-housing types in commercial corridors to allow people with diverse housing needs to live and interact in the same neighborhood. **Policy 5.5:** Provide options for more people to live near work and public transit by allowing higher residential densities in employment centers such as Downtown Burbank and the Media District.	**Consistent** Public transit service in the Specific Plan Area includes the BurbankBus Pink Route and transit service near the Specific Plan Area includes the Metro B Line, Metrolink Ventura County and Antelope Valley Lines, the BurbankBus NoHo to Airport Route, and the Amtrak Pacific Surfliner. The BurbankBus Pink Route bisects the Specific Plan Area, running along Riverside Drive, North Hollywood Way, West Olive Avenue, West Alameda Avenue and South Buena Vista Street. The proposed Project involves development of underutilized opportunity sites within the Specific Plan Area as opportunities for infill and adaptive reuse. These opportunity sites would assist in meeting the City's goals of introducing affordable housing, promoting infill development, and catalyzing economic development in proximity to existing employment centers and envisioned transit centers and corridors. The majority of the proposed Project's opportunity sites would occur adjacent to the BurbankBus Pink Route. The primary goals of the proposed Project are to develop streetscapes and buildings that are sensitive to the surrounding development's intensity and scale and to establish design standards which would ensure neighborhood compatibility and development. Therefore, the proposed Project would be consistent with this policy.

Goal/Policy	Project Consistency
Goal 7: Community Participation: Burbank encourages community engagement and provides a wide range of opportunities to participate in the planning process.	
Policy 7.1: Ensure that Burbank2035 remains relevant by involving the public in planning decisions and by closely monitoring implementation of the plan. **Policy 7.2:** Provide clear, easily understandable, and accessible information to promote community involvement in the planning process. **Policy 7.3:** Consistently seek direct public involvement in the planning process for new projects and plans, as well as for everyday planning matters. **Policy 7.4:** Hold community meetings, workshops, charrettes, etc., and provide other opportunities for input on different days and times and at various locations throughout the city to maximize opportunity for public input. **Policy 7.5:** Continually expand the use of technology to disseminate planning information and solicit input from the public. Use technology and other methods to provide opportunities for the planning process to become less formal and more inclusive.	**Consistent** For the CEQA process, the City of Burbank distributed a Notice of Preparation (NOP) of the Project's Draft EIR for a 30-day agency and public review period that started on November 1, 2023, and concluded on November 30, 2023. During this review period, the City held a joint Community Meeting and EIR Scoping Meeting on November 16, 2023. The meeting, held from 6:00 PM to 7:30 PM, was aimed at providing information about the proposed Project to members of public agencies, interested stakeholders and residents/community members. The City received letters from one public organization, one Native American tribe, and five individuals in response to the NOP during the public review period, as well as various verbal comments during the Joint Community and EIR Scoping Meeting. Chapter 4*, Engagement*, of the proposed Project details the community engagement process for the proposed Project. The public engagement process included, but was not limited to, the following participants: Burbank residents, City Council, City staff, planning staff from the County and City of Los Angeles, developers, advocacy groups, businesses, and SCAG. The primary community engagement strategies utilized for the proposed Project included community workshops, walking tours, stakeholder briefings, study sessions, project webpage and digital engagement tools, direct outreach by request through email, calls, and meetings, and multi-media communications. Details of the community engagement strategies utilized throughout the engagement process are detailed in Chapter 4, *Engagement*, of the proposed Project.
2021-2029 Housing Element	
Goal 1: Existing Housing and Neighborhoods: Burbank seeks to enhance the quality of existing housing and neighborhoods.	
Policy 1.4: Encourage residential and mixed-use developments that not only build buildings but focus on building neighborhoods by incorporating outdoor features that complement the living spaces, as well as providing a mix of amenities that benefit the surrounding neighborhood.	**Consistent** The proposed Project would implement design standards that would result in more efficient use of land area and provide a sense of place. The proposed Project outlines design standards, which detail the form of buildings and how they face and interact with the street, as well as how they are accessed; the design of the streets, streetscape, and sidewalks that provide access to them; the form, location, type, and access to parking; and the form and type of open space (streets, parks, paseos, and plazas). Future development projects under the proposed Project would be reviewed to ensure that the outdoor features (i.e., paseos and plazas) are complementary to living spaces. The proposed Project aims to preserve and otherwise create distinct and well-connected neighborhoods. Therefore, the proposed Project would be consistent with this policy.
Goal 2: Adequate Housing: Burbank seeks to provide housing sites that accommodate a range of housing types to meet the diverse needs of existing and future residents.	
Policy 2.1: Direct the majority of new residential development into Downtown Burbank, the Media District and the Golden State/Airport Area to support the building of neighborhoods where people can live, work, shop, and benefit from access to public transit services including Metrolink train service, Metro bus and BurbankBus lines, as well as a network of bike trails and pedestrian walks.	**Consistent** The proposed Project would allow up to 9,702 residential units to be accommodated in the Specific Plan Area. Public transit service in the Specific Plan Area includes the BurbankBus Pink Route and transit service near the Specific Plan Area includes the Metro B Line, Metrolink Ventura County and Antelope Valley Lines, the BurbankBus NoHo to Airport Route, and the Amtrak Pacific Surfliner. The BurbankBus Pink Route bisects the Specific Plan Area, running along Riverside Drive, North Hollywood Way, West Olive Avenue, West Alameda Avenue and South Buena Vista Street. The majority of the proposed Project's opportunity sites would occur adjacent to the BurbankBus Pink Route. The proposed Project includes strategies specifically to allow people to live, work, and shop in the same area with convenient access to public transit and to improve the safety and efficiency of the pedestrian, bicycle, and public transit transportation systems. Refer to consistency analysis under the Mobility Element Policies 3.3 and 3.5 below for details of the strategies. Therefore, the proposed Project would be consistent with these policies.
Policy 2.2: Update land use regulations that facilitate new opportunities for developing a variety of housing types that include, but are not limited to, small lot development, condominiums, 1-10 townhomes, live-work units, micro-units and accessory dwelling units (ADUs), to accommodate the City's diverse housing needs.	**Consistent** Adoption of the proposed Project would amend the land use designations in the Land Use Element of the Burbank2035 General Plan. The Specific Plan currently includes a variety of land use designations, including Corridor Commercial, Media District Commercial, Medium Density Residential, and High Density Residential and strategically identifies housing opportunity sites to minimize encroachment of incompatible land uses and public facilities. As detailed in Section 2, *Project Description*, of this EIR, the proposed Project would revise the allowed uses, floor area ratio, density, and height for the following proposed land use designations: Medium Density Residential, High Density Residential, Corridor Commercial, Media District Commercial, Open Space and Institutional. The proposed Project would facilitate the development of opportunity sites in the Specific Plan Area resulting in 9,702 residential units and 3,986,207 square feet of commercial and general business development, and 400 hotel rooms. The proposed Project involves development of underutilized opportunity sites within the Specific Plan Area as opportunities for infill and adaptive reuse. These opportunity sites would assist in meeting the City's goals of introducing affordable housing, promoting infill development, and catalyzing economic development in proximity to existing employment centers and envisioned transit centers and corridors. The primary goals of the proposed Project are to develop streetscapes and buildings that are sensitive to the surrounding development's intensity and scale and to establish design standards which would ensure neighborhood compatibility. Therefore, with approval of the General Plan Amendment, the proposed Project would be consistent with this policy.
Policy 2.4: Allow residential units in traditionally non-residential areas including mixed use areas and allow for adaptive reuse of non-residential buildings for residential and live-work units, including potential ground-floor opportunities.	**Consistent** The proposed Project involves development of underutilized opportunity sites within the Specific Plan Area as opportunities for infill and adaptive reuse. These opportunity sites would assist in meeting the City's goals of introducing affordable housing, promoting infill development, and catalyzing economic development in proximity to existing employment centers and envisioned transit centers and corridors. The primary goals of the proposed Project are to develop streetscapes and buildings that are sensitive to the surrounding development's intensity and scale and to establish design standards which would ensure neighborhood compatibility. The proposed Project would, therefore, be consistent with this policy.

Goal/Policy	Project Consistency
Goal 3: Affordable Housing: Burbank will continue to facilitate the development of housing affordable to all economic segments of the community	
Policy 3.9: Encourage use of sustainable and green building design features in new and existing housing, such as working with Burbank Water and Power, and other partners, on energy retrofit programs.	**Consistent** Future development projects under the proposed Specific Plan would be required to comply with the CALGreen Code to ensure that they incorporate green building design features, such as energy-efficient windows, insulation, lighting, ventilation systems, water-efficient fixtures, and electric vehicle charging infrastructure in the development plans. Future development project would also be powered by BWP, which plans to achieve at least 60 percent renewable energy by 2030 and 100 percent GHG-free electricity generation by 2040. Therefore, the proposed Project would be consistent with this policy.
Mobility Element	
Goal 1: Balance: Burbank's transportation system ensures economic vitality while preserving neighborhood character.	
Policy 1.4: Ensure that future land uses can be adequately served by the planned transportation system.	**Consistent** Public transit service in the Specific Plan Area includes the BurbankBus Pink Route and transit service near the Specific Plan Area includes the Metro B Line, Metrolink Ventura County and Antelope Valley Lines, the BurbankBus NoHo to Airport Route, and the Amtrak Pacific Surfliner. The BurbankBus Pink Route bisects the Specific Plan Area, running along Riverside Drive, North Hollywood Way, West Olive Avenue, West Alameda Avenue and South Buena Vista Street. The majority of the proposed Project's opportunity sites would occur adjacent to the BurbankBus Pink Route. The proposed Project includes planned improvements to the pedestrian, bicycle, and transit infrastructure. The proposed Project's pedestrian intersection improvements would primarily take place along West Olive Avenue, West Riverside Drive, West Alameda Avenue, and Buena Vista Street. The planned improvements include high visibility crosswalks, ADA-compliant ramps, enhanced pedestrian lighting, landscaping and shading, and curb extension or sharper radii. The planned pedestrian improvements would support pedestrian traffic and improve pedestrian safety at intersections. The proposed Project includes planned bicycle network improvements throughout the Specific Plan Area. The proposed bicycle network would integrate projects from the City's Complete Our Streets Plan and Bicycle Master Plan. The bicycle network improvements are shown in Figure 6-7 of the proposed Project. The proposed bicycle improvements would allow for more efficient and safe travel for the bicyclists throughout and surrounding the Specific Plan Area. The proposed Project would accommodate a planned BRT route through the Specific Plan Area along West Olive Avenue, North Hollywood Way, West Alameda Avenue, and Buena Vista Street, with two new stations. The planned BRT route and stops would provide faster, more reliable public transit service throughout the Specific Plan Area and to and from the Specific Plan Area. The pedestrian, bicycle, and transit improvements proposed by the Specific Plan would also ensure that future land uses would be adequately served by the planned transportation system. Thus, the proposed Project would be consistent with this policy.
Goal 2: Sustainability: Burbank's transportation system will adapt to changing mobility and accessibility needs without sacrificing today's community values.	
Policy 2.1: Improve Burbank's alternative transportation access to local and regional destinations through land use decisions that support multimodal transportation. **Policy 2.3:** Prioritize investments in transportation projects and programs that support viable alternatives to automobile use.	**Consistent** Public transit service in the Specific Plan Area includes the BurbankBus Pink Route and transit service near the Specific Plan Area includes the Metro B Line, Metrolink Ventura County and Antelope Valley Lines, the BurbankBus NoHo to Airport Route, and the Amtrak Pacific Surfliner. The BurbankBus Pink Route bisects the Specific Plan Area, running along Riverside Drive, North Hollywood Way, West Olive Avenue, West Alameda Avenue and South Buena Vista Street. The majority of the proposed Project's opportunity sites would occur adjacent to the BurbankBus Pink Route. The proposed Project includes planned improvements to the pedestrian, bicycle, and transit infrastructure. The proposed Project's pedestrian intersection improvements would primarily take place along West Olive Avenue and West Riverside Drive, West Olive Avenue and North Hollywood Way, and West Alameda Avenue, and Buena Vista Street. The planned improvements include high visibility crosswalks, ADA-compliant ramps, enhanced pedestrian lighting, landscaping and shading, and curb extension or sharper radii that would support pedestrian traffic and improve pedestrian safety at intersections. The proposed planned bicycle network improvements would integrate projects from the City's Complete Our Streets Plan and Bicycle Master Plan, which are shown in Figure 6-7 of the proposed Project. The proposed bicycle improvements would allow for more efficient and safe travel for the bicyclists throughout and surrounding the Specific Plan Area. The proposed Project would accommodate a planned BRT route through the Specific Plan Area along West Olive Avenue, North Hollywood Way, West Alameda Avenue, and Buena Vista Street, with two new stations. The planned BRT route and stops would provide faster, more reliable public transit service throughout the Specific Plan Area and to and from the Specific Plan Area. The planned BRT route intends to connect the cities of Los Angeles, Burbank, Glendale, and Pasadena, connecting the City to the greater region. The pedestrian, bicycle, and transit improvements proposed by the Specific Plan would also ensure that future land uses would be adequately served by the planned transportation system. Thus, the proposed Project would be consistent with these policies.

Goal/Policy	Project Consistency
Goal 3: Complete Streets. Burbank's complete streets will meet all mobility needs and improve community health.	
Policy 3.3: Provide attractive, safe street designs that improve transit, bicycle, pedestrian, and equestrian connections between homes and other destinations.	**Consistent** The proposed Project includes planned improvements to the pedestrian, bicycle, and transit infrastructure. The planned pedestrian improvements include high visibility crosswalks, ADA-compliant ramps, enhanced pedestrian lighting, landscaping and shading, and curb extension or sharper radii that would support pedestrian traffic and improve pedestrian safety at intersections. The proposed bicycle network improvements would integrate projects from the City's Complete Our Streets Plan and Bicycle Master Plan, which would allow for more efficient and safe travel for the bicyclists throughout and surrounding the Specific Plan Area. The proposed Project would also accommodate a planned BRT route through the Specific Plan Area along West Olive Avenue, North Hollywood Way, West Alameda Avenue, and Buena Vista Street, with two new stations that would provide faster, more reliable public transit service throughout the Specific Plan Area and to and from the Specific Plan Area. The roadway network strategies in the proposed Project include updating existing neighborhood protection plans which protect neighborhoods from non-residential traffic, roadway design improvements, adoption of TDM programs, and careful consideration of transit stop amenities, including accessibility. Implementation of the roadway network strategies would support the development of a safe, multimodal network in the Specific Plan Area. Additionally, the proposed Project includes Complete Our Streets objectives, which plans to integrate the Specific Plan's multimodal network into the Citywide transit, pedestrian, and bicycle networks and incorporate the City's Complete Streets objective development standards into the proposed Project's development standards. Therefore, the proposed Project's pedestrian, bicycle, and transit infrastructure improvements would result in improved mobility, accessibility, and safety and the proposed Project would be consistent with this policy.
Policy 3.4: All street improvements should be implemented within the existing right-of-way. Consider street widening and right-of-way acquisition as methods of last resort. **Policy 3.5:** Design street improvements so they preserve opportunities to maintain or expand bicycle, pedestrian, and transit systems.	**Consistent** The proposed Project includes planned improvements to the pedestrian, bicycle, and transit infrastructure. The proposed Project's pedestrian intersection improvements would primarily take place along West Olive Avenue and West Riverside Drive, West Olive Avenue and North Hollywood way, and West Alameda Avenue and Buena Vista Street. The planned improvements include high visibility crosswalks, ADA-compliant ramps, enhanced pedestrian lighting, landscaping and shading, and curb extension or sharper radii that would support pedestrian traffic and improve pedestrian safety at intersections. The planned pedestrian improvements would occur within the existing rights-of-way. The proposed Project includes planned bicycle network improvements throughout the Specific Plan Area. The proposed bicycle network would integrate projects from the City's Complete Our Streets Plan and Bicycle Master Plan which are shown in Figure 6-7 of the proposed Project. The proposed bicycle improvements would occur within the existing rights-of-way which would allow for more efficient and safe travel for the bicyclists throughout and surrounding the Specific Plan Area. The proposed Project accommodates a planned BRT route through the Specific Plan Area along West Olive Avenue, North Hollywood Way, West Alameda Avenue, and Buena Vista Street, with two new stations. The planned BRT route and stops would provide faster, more reliable public transit service throughout the Specific Plan Area and to and from the Specific Plan Area. The planned BRT route and stations would occur within the existing rights-of-way. The pedestrian, bicycle, and transit improvements proposed by the Specific Plan would also ensure that future land uses would be adequately served by the planned transportation system. Thus, the proposed Project would be consistent with these policies.
Goal 4: Transit. Burbank's convenient, efficient public transit network provides a viable alternative to the automobile.	
Policy 4.3: Improve and expand transit centers; create a new transit center in the Media District **Policy 4.8:** Promote multimodal transit centers and stops to encourage seamless connections between local and regional transit systems, pedestrian and bicycle networks, and commercial and employment centers.	**Consistent** Public transit service in the Specific Plan Area includes the BurbankBus Pink Route and transit service near the Specific Plan Area includes the Metro B Line, Metrolink Ventura County and Antelope Valley Lines, the BurbankBus NoHo to Airport Route, and the Amtrak Pacific Surfliner. The BurbankBus Pink Route bisects the Specific Plan Area, running along Riverside Drive, North Hollywood Way, West Olive Avenue, West Alameda Avenue and South Buena Vista Street. The majority of the proposed Project's opportunity sites would occur adjacent to the BurbankBus Pink Route. The proposed Project includes planned improvements to the pedestrian, bicycle, and transit infrastructure. The proposed Project's pedestrian intersection improvements would primarily take place along West Olive Avenue, West Riverside Drive, West Alameda Avenue, and Buena Vista Street. The planned improvements include high visibility crosswalks, ADA-compliant ramps, enhanced pedestrian lighting, landscaping and shading, and curb extension or sharper radii that would support pedestrian traffic and improve pedestrian safety at intersections. The proposed Project includes planned bicycle network improvements throughout the Specific Plan Area. The proposed bicycle network would integrate projects from the City's Complete Our Streets Plan and Bicycle Master Plan, which are shown in Figure 6-7 of the proposed Project. The proposed bicycle improvements would allow for more efficient and safe travel for the bicyclists throughout and surrounding the Specific Plan Area. The proposed Project accommodates a planned BRT route through the Specific Plan Area along West Olive Avenue, North Hollywood Way, West Alameda Avenue, and Buena Vista Street, with two new stations. The planned BRT route and stops would provide faster, more reliable public transit service throughout the Specific Plan Area and to and from the Specific Plan Area. The pedestrian, bicycle, and transit improvements proposed by the Specific Plan would also ensure that future land uses would be adequately served by the planned transportation system. Thus, the proposed Project would be consistent with these policies.

Goal/Policy	Project Consistency
Goal 5: Bicycle and Pedestrian Mobility. Burbank fosters pedestrian and bicycle travel as healthy, environmentally sound methods to reduce vehicle trips and improve community character.	
Policy 5.1: Maximize pedestrian and bicycle safety, accessibility, connectivity, and education throughout Burbank to create neighborhoods where people choose to walk or ride between nearby destinations. **Policy 5.3:** Provide bicycle connections to major employment centers, shopping districts, residential areas, and transit connections.	**Consistent** The proposed Project includes planned improvements to the pedestrian and bicycle infrastructure. The proposed Project's pedestrian intersection improvements would primarily take place along West Olive Avenue, West Riverside Drive, West Alameda Avenue, and Buena Vista Street. The planned improvements include high visibility crosswalks, ADA-compliant ramps, enhanced pedestrian lighting, landscaping and shading, and curb extension or sharper radii. The planned pedestrian improvements would support pedestrian traffic and improve pedestrian safety at intersections. The proposed bicycle network would integrate projects from the City's Complete Our Streets Plan and Bicycle Master Plan which are shown in Figure 6-7 of the proposed Project. The proposed bicycle improvements would allow for more efficient and safe travel for the bicyclists throughout and surrounding the Specific Plan Area. The pedestrian and bicycle improvements proposed by the Specific Plan would maximize pedestrian and bicycle accessibility and connectivity throughout the Specific Plan Area. Thus, the proposed Project would be consistent with these policies.
Policy 5.4: Ensure that new commercial and residential developments integrate with Burbank's bicycle and pedestrian networks. **Policy 5.5:** Require new development to provide land necessary to accommodate pedestrian infrastructure, including sidewalks at the standard widths specified in Table M-2.	**Consistent** The proposed Project includes planned improvements to the pedestrian, bicycle, and transit infrastructure. The pedestrian intersection improvements would primarily take place along West Olive Avenue and West Riverside Drive, West Olive Avenue and North Hollywood way, and West Alameda Avenue and Buena Vista Street. The planned improvements include high visibility crosswalks, ADA-compliant ramps, enhanced pedestrian lighting, landscaping and shading, and curb extension or sharper radii that would support pedestrian traffic and improve pedestrian safety at intersections. The planned pedestrian improvements would occur within the existing rights-of-way. The proposed Project includes planned bicycle network improvements throughout the Specific Plan Area. The proposed bicycle network would integrate projects from the City's Complete Our Streets Plan and Bicycle Master Plan which are shown in Figure 6-7 of the proposed Project. The proposed bicycle improvements would occur within the existing rights-of-way which would allow for more efficient and safe travel for the bicyclists throughout and surrounding the Specific Plan Area. The proposed Project accommodates a planned BRT route through the Specific Plan Area along West Olive Avenue, North Hollywood Way, West Alameda Avenue, and Buena Vista Street, with two new stations. The planned BRT route and two new stations would provide faster, more reliable public transit service throughout the Specific Plan Area and to and from the Specific Plan Area. The roadway network strategies in the proposed Project include updating existing neighborhood protection plans which protect neighborhoods from non-residential traffic, roadway design improvements, adoption of TDM programs, and careful consideration of transit stop amenities, including accessibility. Implementation of the roadway network strategies would support the development of a safe, multimodal network in the Specific Plan Area. Additionally, the proposed Project includes Complete Our Streets objectives, which plans to integrate the Specific Plan's multimodal network into the Citywide transit, pedestrian, and bicycle networks and incorporate the City's Complete Streets objective development standards into the proposed Project's development standards. Therefore, the proposed Project's pedestrian, bicycle, and transit infrastructure improvements would result in improved mobility, accessibility, and safety and the proposed Project would be consistent with this policy.
Goal 7: Parking. Burbank's public and private parking facilities are well managed and convenient.	
Policy 7.1: Effectively manage citywide parking to improve convenience while maximizing use at all times of the day.	**Consistent** The parking strategies in the proposed Project include permit parking, priced parking, parking benefit district, and off-street parking programs. Implementation of the parking strategies would ensure that an adequate parking supply in the Specific Plan Area is maintained. Therefore, the proposed Project would be consistent with this policy.
Goal 9: Safety, Accessibility, Equity. Burbank's transportation network is safe, accessible, and equitable.	
Policy 9.1: Ensure safe interaction between all modes of travel that use the street network, specifically the interaction of bicyclists, pedestrians, and equestrians with motor vehicles. **Policy 9.3:** Provide access to transportation alternatives for all users, including senior, disabled, youth, and other transit-dependent residents.	**Consistent** The proposed Project includes planned improvements to the pedestrian, bicycle, and transit infrastructure. The proposed Project's pedestrian intersection improvements would primarily take place along West Olive Avenue and West Riverside Drive, West Olive Avenue and North Hollywood way, and West Alameda Avenue and Buena Vista Street. The planned improvements include high visibility crosswalks, ADA-compliant ramps, enhanced pedestrian lighting, landscaping and shading, and curb extension or sharper radii that would support pedestrian traffic and improve pedestrian safety, including seniors, disabled persons, and youth, at intersections. The proposed Project includes planned bicycle network improvements throughout the Specific Plan Area. The proposed bicycle network would integrate projects from the City's Complete Our Streets Plan and Bicycle Master Plan which are shown in Figure 6-7 of the proposed Project. The proposed bicycle improvements would allow for more efficient and safe travel for the bicyclists, as well as providing more safe transportation alternatives to the local community. The proposed Project accommodates a planned BRT route through the Specific Plan Area along West Olive Avenue, North Hollywood Way, West Alameda Avenue, and Buena Vista Street, with two new stations. The planned BRT route and stops would provide faster, more reliable public transit service throughout the Specific Plan Area and to and from the Specific Plan Area. The pedestrian, bicycle, and transit improvements proposed by the Specific Plan would also ensure that future land uses would be adequately served by the planned transportation system. Thus, the proposed Project would be consistent with this policy.

Goal/Policy	Project Consistency
Noise Element	
Goal 2: Noise in Mixed-Use Development. Noise from commercial activity is reduced in residential portions of mixed-use projects.	
Policy 2.1: Require the design and construction of buildings to minimize commercial noise within indoor areas of residential components of mixed-use projects. **Policy 2.2:** Locate the residential portion of new mixed-use projects away from noise-generating sources such as mechanical equipment, gathering places, loading bays, parking lots, driveways, and trash enclosures.	**Consistent** The proposed Project would facilitate new development, including mixed-use projects, which consequently would generate noise intermittently throughout the construction and operation of the project. The proposed Project does not include specific residential designs and unit locations; however, in the event that residential portions of new mixed-use projects are located near construction activity, the project would be required to follow Mitigation Measures NOI-1a through NOI-1i outlined in Section 4.11, *Noise*. In addition, the Specific Plan would include objective development standards to address project features that may impact adjacent uses, such as building orientation and design and location of ancillary equipment. While project-level details are not currently available for future projects that would be facilitated by the proposed Project, it is assumed that future mixed-use development would not generate an excess amount of noise, as the main source of noise within indoor areas of residential components of mixed-use projects would be the addition of stationary noise sources, such as HVAC equipment. Additionally, the Burbank2035 General Plan Noise Element established a maximum interior noise level limit for residential development, requiring that sufficient noise insulation be provided to maintain interior noise levels below 45 dBA CNEL, which would reduce noise levels from commercial or office uses within a mixed-use development. Therefore, the proposed Project would be consistent with these policies.
Goal 7: Construction, Maintenance, and Nuisance Noise. Construction, maintenance, and nuisance noise is reduced in residential areas and at noise-sensitive land uses.	
Policy 7.1: Avoid scheduling city maintenance and construction projects during evening, nighttime, and early morning hours.	**Consistent** Construction associated with the proposed Project would be required to comply with the allowed daytime construction hours regulated by the BMC Section 9-1-1-105.10 and would not occur during nighttime hours between 7:00 PM and 7:00 AM Monday through Friday, between 5:00 PM and 8:00 AM Saturdays, or at any time on Sundays or national holidays. Therefore, the proposed Project would be consistent with this policy.
Policy 7.2: Require project applicants and contractors to minimize noise in construction activities and maintenance operations.	**Consistent** The proposed Project would result in a buildout of 9,702 residential units and 3,986,207 square feet of non-residential development. Construction activities associated with future development projects could expose sensitive receptors located throughout the Specific Plan Area. To reduce noise impacts from construction a future development projects would be required to implement Mitigation Measures NOI-1a through NOI-1i as discussed in Section 4.11, *Noise*. While it cannot be guaranteed that construction noise impacts would be reduced to the 80-dBA significance threshold, the implementation of these measures would significantly reduce noise impacts. As such, the proposed Project would be consistent with this policy.
Policy 7.3: Limit the allowable hours of construction activities and maintenance operations located adjacent to noise-sensitive land uses.	**Consistent** Construction associated with projects under the proposed Project would be required to comply with the allowed daytime construction hours regulated by the BMC Section 9-1-1-105.10 and would not occur during nighttime hours between 7:00 PM and 7:00 AM Monday through Friday, between 5:00 PM and 8:00 AM Saturdays, or at any time on Sundays or national holidays. Therefore, the proposed Project would be consistent with this policy.
Policy 7.4: Limit the allowable hours of operation for and deliveries to commercial, mixed-use, and industrial uses located adjacent to residential areas.	**Consistent** As detailed in Section 4.11, *Noise*, of this EIR, future projects under the proposed Project would be required to comply with the operational hours outlined in the Burbank Noise Control Ordinance or mitigate noise at sensitive land uses to below Noise Control Ordinance standards. Therefore, the proposed Project would be consistent with this policy.
Open Space and Conservation Element	
Goal 2: Parks, Open Space, and Recreation Facilities: Parks, open space and recreation facilities contribute to the high quality of life enjoyed by Burbank residents and the economic value of the community.	
Policy 2.3: Provide park and recreation facilities at a minimum level of 3 acres per 1,000 persons, with the goal of 5 acres per 1,000 persons.	**Consistent** Housing development associated with the proposed Project would add an estimated 24,226 residents to the City (based on the average household size in Burbank of 2.37, increasing Burbank's population from 105,804 (DOF 2024b) to 129,829 during the proposed Project's planning and implementation period. The increase in residents would decrease the existing parkland ratio of 6.9 acres per 1,000 residents to 5.6 acres per 1,000 residents. This ratio would still meet the City's goal of five acres of parkland per 1,000 residents. All future development projects under the proposed Project would need to provide dedicated parkland within the Specific Plan Area, parkland improvements, or pay in-lieu fees if they are unable to dedicate land or if the land is considered unsuitable for park or recreation use. Therefore, the proposed Project would be consistent with this policy.
Goal 3: Park and Recreation Facilities Maintenance. Parks and recreation facilities are improved and maintained to ensure they meet the needs of the community.	
Policy 3.6: Improve and maintain access to accommodate persons with disabilities at all parks.	**Consistent** The proposed Project would contain infrastructure strategies that would (1) improve and maintain access to accommodate persons with disabilities at parks, such as curb ramps, and (2) include an assessment of the Specific Plan Area's curb ramps to ensure they are up to date with current ADA standards, and (3) install updated ramps where needed. Therefore, the proposed Project would be consistent with this policy.

Goal/Policy	Project Consistency
Policy 3.7: Ensure that the public transit system connects parks and recreation facilities to the rest of the community.	**Consistent** Public transit service in the Specific Plan Area includes the BurbankBus Pink Route and transit service near the Specific Plan Area includes the Metro B Line, Metrolink Ventura County and Antelope Valley Lines, the BurbankBus NoHo to Airport Route, and the Amtrak Pacific Surfliner. The BurbankBus Pink Route bisects the Specific Plan Area, running along Riverside Drive, North Hollywood Way, West Olive Avenue, West Alameda Avenue and South Buena Vista Street. The majority of the proposed Project's opportunity sites would occur adjacent to the BurbankBus Pink Route. The BurbankBus Pink Route would connect residents within the Specific Plan Area to the rest of the City. The BurbankBus Pink Route includes a stop at the Joselyn Center, which is adjacent to the George Izay Park and Olive Recreation Center, providing access for Specific Plan Area residents to parks and recreation facilities outside of the Specific Plan Area. The proposed Project accommodates a planned BRT route through the Specific Plan Area along West Olive Avenue, North Hollywood Way, West Alameda Avenue, and Buena Vista Street, with two new stations. One of the proposed stations would be on West Alameda Avenue and South Buena Vista Street, approximately 0.25-mile from Johnny Carson Park. Therefore, the proposed Project would support a planned BRT route with a stop in the vicinity of a public park, and, as such, the proposed Project would be consistent with this policy.
Goal 5: Creation of a Comprehensive Trails Network. Parks, trails, and open spaces are connected within the city and to regional open spaces.	
Policy 5.4: Require that new development projects provide public access to adjacent open space areas.	**Consistent** Future development projects under the proposed Project in the eastern portion of the Specific Plan Area would have access to open space via Johnny Carson Park. The proposed Project includes development standards regarding publicly accessible open space minimum requirements, which would ensure that future development projects would provide public access to adjacent open space areas. Therefore, future development projects under the proposed Project would provide public access to adjacent open space areas, and, as such, the proposed Project would be consistent with this policy.
Goal 6: Open Space Resources. Burbank's open space areas and mountain ranges are protected spaces supporting important habitat, recreation, and resource conservation.	
Policy 6.2: Protect the ecological integrity of open spaces and maintain and restore natural habitats and native plant communities.	**Consistent** The proposed Project would introduce development in a fully-developed area that would not jeopardize ecological or biological resources. As discussed in Section 4.3, *Biological Resources*, of this EIR, impacts on nesting birds, aquatic or terrestrial habitat, and special-status species would be less than significant with the incorporation of Mitigation Measure BIO-1, which encompasses project-specific biological resources surveys and outlines protocols for future development projects occurring within or adjacent to areas that could support nesting birds. In addition, should future development projects occur near the Los Angeles River or other aquatic resources (if present) in the Specific Plan Area, they would be subject to regulations, such as Section 1602 of the California Fish and Game Code and Sections 401 and 404 of the Clean Water Act. Therefore, the proposed Project would be consistent with this policy.
Goal 8: Biological Resources. Burbank's high-quality natural biological communities are sustained.	
Policy 8.1: Prohibit development that jeopardizes or diminishes the integrity of sensitive or protected plant and animal communities. **Policy 8.2.** Improve ecological and biological conditions in urban and natural environments when reviewing proposals for site development, as well as when making public improvements. **Policy 8.4:** Naturalize disturbed areas and prevent the invasion of exotic plants. **Policy 8.5:** Encourage landscaping that incorporates native plant species.	**Consistent** The proposed Project would introduce development in a fully-developed area that would not jeopardize ecological or biological resources. As discussed in Section 4.3, *Biological Resources*, of this EIR, impacts on nesting birds, aquatic or terrestrial habitat, and special-status species would be less than significant with the incorporation of Mitigation Measure BIO-1, which encompasses project-specific biological resources surveys and outlines protocols for future development projects occurring within or adjacent to areas that could support nesting birds. In addition, should future development projects occur near the Los Angeles River or other aquatic resources (if present) in the Specific Plan Area, they would be subject to regulations, such as Section 1602 of the California Fish and Game Code and Sections 401 and 404 of the Clean Water Act. The proposed Project includes development standards which require that landscaping for future development projects shall consist of California native, non-invasive, and/or low-water use plant species. The proposed Project also requires review of landscape plans which would ensure improvement of ecological and biological conditions in landscaping for future development projects under the proposed Project. Therefore, the proposed Project would be consistent with this policy.
Goal 10: Energy Resources. Burbank conserves energy, uses alternative energy sources, and promotes sustainable energy practices that reduce pollution and fossil fuel consumption.	
Policy 10.1: Incorporate energy conservation strategies in City projects. **Policy 10.2:** Promote energy-efficient design features to reduce fuel consumption for heating and cooling.	**Consistent** Future development projects facilitated under the proposed Project would be subject to the energy conservation requirements of the California Energy Code and the CALGreen Code. Furthermore, the 2022 Building Energy Efficiency Standards require newly constructed buildings to meet energy performance standards set by the California Energy Commission. These standards are specifically crafted for new buildings to result in energy efficient performance; including, but not limited to fuel consumption for heating and cooling.. Thus, the proposed Project would be consistent with these policies.

Goal/Policy	Project Consistency
Safety Element	
Goal 2: Police Protection: Burbank provides high-quality police protection services to residents and visitors.	
Policy 2.1: Maintain an average police response time of less than 4 minutes to emergency calls for service. **Policy 2.2:** Ensure adequate staffing, facilities, equipment, technology, and funding for the Burbank Police Department to meet existing and projected service demands and response times.	**Consistent** Development associated with the proposed Project would add an estimated 24,226 residents to the City; based on the average household size in Burbank of 2.37, increasing Burbank's population from 105,603 to 129,829 during the proposed Project's planning implementation period. Based on Burbank Police Department (BPD) current staffing level of 160 sworn officers, BPD's officer/resident ratio would drop from approximately 1.54 to approximately 1.23 sworn officers per 1,000 residents. Additional demand for police service would be accommodated through the expansion of police personnel and facilities to continue to meet the BPD's service standards. Police protection service levels would continue to be evaluated and maintained by BPD in accordance with existing policies, procedures, and practices as development occurs over the lifetime of the proposed Project. Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172, which directed the proceeds of a 0.50-percent sales tax to be expended exclusively for local public safety services, including police protection services. Additionally, future development projects under the proposed Project would be required to pay development impact fees to help fund additional facilities and equipment for police protection. These funds, in addition to the General Fund from property and sales tax revenues, would help pay for costs associated with the development of new police stations, if needed, including any required environmental analysis. Planning for new or physically altered BPD stations is based on an assessment of the cumulative need for new facilities. To support population growth associated with the proposed Project, the proposed Project may require new or expanded facilities; however, the incremental contribution to demand for increased BPD protection services would be offset by payment of proportionate property taxes and sales taxes and development impact fees to the City of Burbank by developers and the addition of new residents. Future physical changes made to the environment due to future infrastructure projects would be required to undergo separate project-level CEQA analysis to identify and address impacts. Therefore, the proposed Project would be consistent with this policy.
Goal 4: Fire Protection. Burbank provides high-quality fire protection services to residents and visitors. Threats to public safety are reduced and property is protected from wildland and urban fire hazards.	
Policy 4.1: Maintain a maximum response time of 5 minutes for fire suppression services. Require new development to ensure that fire response times and service standards are maintained. **Policy 4.2:** Provide adequate staffing, equipment, technology, and funding for the Burbank Fire Department to meet existing and projected service demands and response times. **Policy 4.7:** Maintain adequate fire suppression capability in areas of intensifying urban development, as well as areas where urban uses and open spaces mix.	**Consistent** As discussed in EIR Section 4.13, *Public Services*, the population growth carried out under the proposed Project may require construction of new or expanded fire protection facilities. However, all future development projects carried out under the proposed Project would be required to comply with all applicable fire code and ordinances requirements for construction, emergency/fire, access, water mains, fire flows, and hydrants, and would be subject to review and approval by the Burbank Fire Department (BFD) prior to building permit and certificate of occupancy issuance. Development with modern materials and in accordance with current standards, inclusive of fire-resistant materials, fire alarms and detection systems, automatic fire sprinklers, would enhance fire safety and support fire protection services. Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172, which directed the proceeds of a 0.50-percent sales tax to be expended exclusively for local public safety services, including fire protection services. The BFD receives its funding through property taxes, fees for service, and grant funding and can fund expanded services as new development occurs. All new development projects under the proposed Project would be required to pay fire protection development impact fees to fund additional facilities and equipment. These funds, in addition to General Fund property and sales tax revenues, would help pay for costs associated with the development of new fire stations, if needed, including any required environmental analysis. As a result of new housing and population growth consistent with the proposed Project, the City would consider long term capital facility needs and associated staffing needs to maintain optimal rates of emergency service personnel per capita to ensure continuity of service at levels that protect the public health, safety, and general welfare consistent with California Constitution Article XIII Section 35 subdivision (a)(2). Therefore, development fees, funds from property taxes, and grant funding would support any increased fire department costs. In addition, if a new future fire station or an expansion to an existing station were required, it would be subject to CEQA review at the time a site is identified, and a specific design proposed. Given the city's highly developed nature and the likelihood that a station would be on an infill site, potential impacts under that infrastructure project would likely be less than significant or even exempt from CEQA review. Based on the foregoing analysis, the proposed Project would be consistent with these policies.
Goal 5 Seismic Safety. Injuries and loss of life are prevented, critical facilities function, and property loss and damage is minimized during seismic events.	
Policy 5.4: Encourage and facilitate retrofits of seismically high-risk buildings to reduce risks from seismic ground shaking.	**Consistent** As discussed in Section 4.19.6, *Geology and Soils*, of this EIR, all future development projects carried out under the proposed Project would be designed and constructed in accordance with State and local building codes to reduce the potential for exposure of people or structures to seismic risks. Future development in the Specific Plan Area would be required to adhere to the Uniform Building Code (UBC) and the latest California Building Code (CBC). The UBC and CBC development standards regulate the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking. Thus, the proposed Project would be consistent with this policy.

Source: Burbank2035 General Plan

Burbank Municipal Code and Burbank2035 General Plan Amendments

The development standards outlined in the proposed Project would augment and replace many standards of the BMC. Upon adoption of the proposed General Plan Amendment/Map Amendment, Specific Plan, Zoning Map Update, and Zone Text Amendments, the proposed Project would comply with the land use requirements set forth by the Burbank2035 General Plan and the BMC. Therefore, impacts related to conflicts with the BMC and Burbank2035 General Plan would be less than significant.

The proposed Project would include a zone text amendment to streamline development processes through the introduction of objective development and design standards. The following amendments are proposed:

- Zoning Map updated to be consistent with the proposed updated General Plan Land Use Map.
- Zone Text Amendment to incorporate by reference the new objective development standards consistent with the Specific Plan goals and policies.
- Define "Exceptional Projects" within the BMC.

Determination

Significant and unavoidable impact

4.10.4 Cumulative Impacts

The geographic extent of cumulative analysis for land use and planning is the City of Burbank, particularly areas of anticipated development under the Downtown Burbank Transit Oriented Development (TOD) Specific Plan (a consolidation and update of the North San Fernando Boulevard Master Plan and the Burbank Center Plan) and the Golden State Specific Plan (GSSP), as described in Section 3, *Environmental Setting*. As described in Section 3, *Environmental Setting,* the Downtown TOD Specific Plan would facilitate development of up to 9,944 residential units and 6,083,657 square feet of commercial and business development land uses; and the GSSP would facilitate development of up to 7,205 residential units and 3,149,623 square feet of commercial and business development land uses. Cumulative impacts may occur if impacts of the proposed Project combine with similar impacts of other projects in the cumulative scenario.

Division of an Established Community

Future development projects accommodated by the proposed Project and the two Specific Plans specified above would occur within City limits, in highly urbanized areas. Since Burbank is built out, if new roads are required for future development projects under the proposed Project and two Specific Plans, they would either be short public roads to facilitate access to a site or private streets within a proposed development project. Therefore, cumulative development projects are not anticipated to involve the construction of new roads, railroads, or other features that may physically divide established communities in Burbank. Therefore, the incremental effect of the proposed Project related to the division of an established community would not be cumulatively considerable and there would be no cumulative impacts.

Conflict with any Land Use Plan, Policy, or Regulation

The proposed Project, the Downtown TOD Specific Plan and the GSSP would be generally consistent with the Burbank2035 General Plan goals and policies intended to encourage transit-oriented and sustainable development while protecting the character of the neighborhoods within the respective Specific Plan Areas. Land use and policy consistency impacts associated with buildout of the Downtown Burbank TOD Specific Plan and the GSSP would be addressed on a case-by-case basis to determine consistency with applicable plans and policies.

As stated in Section 4.2, *Air Quality*, of this EIR, in order to assess cumulative impacts of emissions, SCAQMD recommends that projects be evaluated to determine whether they would be consistent with project-specific emissions thresholds. In the case of proposed Project, air pollutant emissions would be considered to be cumulatively considerable if the new sources of emissions exceed SCAQMD project-specific emissions thresholds. As detailed under Impact LU-1 and in Section 4.2, *Air Quality*, of this EIR, the development proposed under the proposed Project would generate short-term and long-term criteria air pollutant emissions in exceedance of short-term and long-term SCAQMD regional thresholds, would expose sensitive receptors to substantial pollutant concentrations. The proposed Project would implement Mitigation Measures AQ-1 and AQ-2 to reduce short-term and long-term criteria pollutants, but implementation would not reduce emissions below SCAQMD regional significance thresholds. Thus, the incremental effect of the proposed Project related to construction and operation air quality would be cumulatively considerable and cumulative impacts would be significant and unavoidable.

As described in Section 4.17.4, *Utilities and Service Systems*, of this EIR, the additional wastewater flows generated by development under the proposed Project, Downtown TOD Specific Plan, and GSSP would exceed the existing daily rate of the BWRP and would exceed the existing limited remaining capacity which would require substantial facility improvements to accommodate this exceedance. Potential future improvements to increase the treatment capacity of the BWRP would require upgrades to the headworks, the addition of new primary clarifiers, modifications to the secondary treatment process, process, and expansion of the equalization basins (beyond the near-term 10-year planning horizon). Due to limited space at BWRP, and the inter-reliability of the treatment train processes, upgrades to expand BWRP capacity to accommodate any additional inflows would require substantial facility improvements. To expand the existing BWRP capacity to accommodate the estimated average additional sewer flow for the proposed Project, Downtown TOD Specific Plan, and GSSP of approximately 9.5 MGD would require additional BWRP upgrades to the headworks, primary clarifiers, equalization basins, aeration basins/blowers, secondary clarifiers, filters, and chemical treatment (chlorine contact tanks). Furthermore, improvements for the proposed Project, Downtown TOD Specific Plan, and GSSP would require the acquisition of approximately 48,000 square feet of additional property to expand the footprint of the existing BWRP. Finally, the preliminary cost estimates to expand the BWRP to treat the proposed Project, Downtown TOD Specific Plan, and GSSP, including acquiring the required additional property, are approximately 430 million dollars. The proposed Project would require implementation of Mitigation Measures UTIL-1a through UTIL-1e, and UTIL-3a and UTIL-3b to reduce potential impacts to wastewater system conveyance and treatment capacity, but would not reduce impacts to a less than significant level within the proposed Project horizon. The larger improvements to reduce impacts from the proposed Project to the wastewater system are expected to be implemented beyond 10-year planning period; instead, the larger improvements are estimated to require approximately 22 years to implement. Therefore, impacts would be significant and unavoidable due to constraints within the sewer system and

development under the proposed Project would contribute to a cumulatively significant impact associated with wastewater generation.

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4.11 Noise

This section evaluates potential environmental impacts related to noise associated with implementation of the proposed Project. Specifically, this Section reviews the proposed Project's impact on increases to ambient noise levels and generation of excessive groundborne vibration and groundborne noise levels. The other threshold of significance associated with proximity to airports is discussed in Section 4.19, *Effects Found Not to be Significant*; therefore, this issue is not studied further herein. Supporting noise information is included in Appendix G to this EIR.

4.11.1 Environmental Setting

a. Fundamentals of Noise

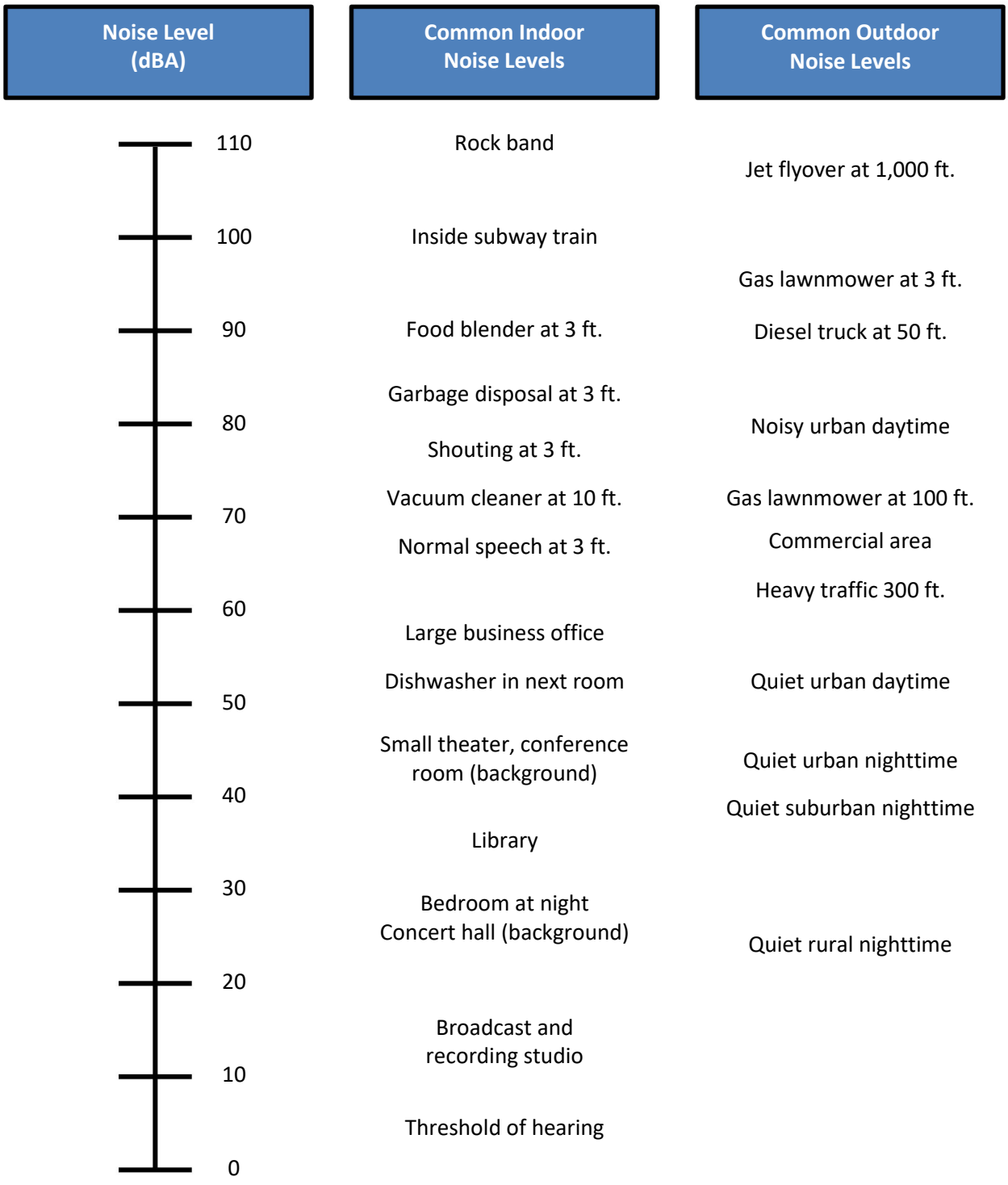
Sound is a vibration that transmits through a medium (such as a gas, liquid, or solid) created by a moving or vibrating source, which is capable of being detected by the hearing organs. *Noise* is defined as sound that is loud, unpleasant, unexpected, or undesired and may, therefore, be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance, and, in the extreme, hearing impairment (California Department of Transportation [Caltrans] 2013).

Noise levels are commonly measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound pressure levels so that they are consistent with the human hearing response, which is most sensitive to frequencies around 4,000 hertz (Hz) and less sensitive to frequencies around and below 100 Hz (Kinsler et al. 1999). Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used to measure earthquake magnitudes. A doubling of the energy of a noise source, such as the doubling of vehicle traffic volumes, results in a noise level increase of 3 dB, whereas dividing the energy in half results in a 3-dB decrease (Crocker 2007).

Human perception of noise has no simple correlation with sound energy (i.e., the perception of sound is not linear in terms of dBA or in terms of sound energy). Two sources, each containing the same sound energy, do not "sound twice as loud" as one source. It is widely accepted that the average healthy human ear can detect changes (either increases or decreases) of 3 dBA, which is recognized as being barely perceptible to most people. Similarly, a change of 5 dBA is readily perceptible and a change of 10 dBA sounds twice (or half) as loud (Crocker 2007).

Common outdoor and indoor noise sources and their typical corresponding A-weighted noise levels are shown in Figure 4.11-1.

Figure 4.11-1 Examples of Typical Noise Levels



Source: Caltrans 2013

Descriptors

The impact of noise is not a function of loudness alone. The time of day at which noise occurs and the duration of the noise are also important factors when considering potential noise impacts. Most noise that lasts for more than a few seconds is variable in its amplitude (i.e., the noise level continuously fluctuates over time). Consequently, a variety of noise descriptors have been developed. One of the most frequently used noise metrics is the equivalent continuous sound level (L_{eq}), which considers both duration and the sound power level of the source. L_{eq} is defined as the single steady A-weighted level equivalent to the same amount of energy as that contained in the actual fluctuating levels over time. The extent of sound level fluctuations over a period of time is characterized by the minimum (L_{min}) and maximum (L_{max}) sound pressure levels, which represent the lowest and highest sound pressure levels measured during a given period, respectively.

The sound level that is exceeded "n" percent of time during a given sample period in the percentile noise level is represented as L_n. For example, the L_{50} level is the statistical indicator of the time-varying noise signal that is exceeded 50 percent of the time (during each sampling period), which means that half of the sampling time, the changing noise levels are above this value, and the other half of the time, they are below it. This is called the "median sound level." The L_{10} level, likewise, is the value that is exceeded 10 percent of the time (i.e., near the maximum), and this is often known as the "intrusive sound level." The L_{90} is the sound level exceeded 90 percent of the time and is often considered the "effective background level" or "residual noise level."

Noise that occurs at night tends to be more disturbing than noise that occurs during the day. Community noise is usually measured using the Day-Night Average Sound Level (L_{dn}), which is the 24-hour average noise level with a 10-dBA penalty added for noise occurring during nighttime hours (10:00 p.m. to 7:00 a.m.) hours. It is also measured using the Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a 5-dBA penalty added for noise occurring during evening hours (7:00 p.m. to 10:00 p.m.) and a 10-dBA penalty added for noise occurring during nighttime hours (10:00 p.m. to 7:00 a.m.) (Caltrans 2013). Noise levels described by the L_{dn} and CNEL usually differ by about 1 dBA. The relationship between the peak-hour L_{eq} value and the L_{dn}/CNEL depends on the distribution of traffic during the day, evening, and night.

Propagation

The level and frequency content of sound change as it travels from the source to a receiver. The most obvious change is the decrease in level as the distance from the source increases. The manner by which sound is reduced with distance depends on various factors, such as the type of source (e.g., a point or line source), the path the sound travels, site conditions, and the presence of intervening structures or other obstacles. Noise from a point source (e.g., construction equipment, industrial machinery, ventilation units) typically is reduced at a rate of 6 dBA per each doubling of distance away from the source. Noise from a line source (e.g., roadway, pipeline, railroad) typically is reduced at a rate of 3 dBA per each doubling of distance away from the source (Caltrans 2013). The propagation of noise is also affected by the absorption characteristics of the ground: a hard site, such as a parking lot or smooth body of water, provides no absorption/attenuation, and the changes in noise levels with distance result simply from the geometric spreading of the source (i.e., 3- or 6-dBA reduction per doubling of distance for a point source or line source, respectively). Conversely, a soft site, such as soft dirt, grass, or scattered bushes and trees, may provide additional absorption/attenuation, potentially reducing noise levels an additional 1.5-dBA per doubling of distance away from the source (Caltrans 2013).

Noise levels may also be reduced by intervening structures. The amount of reduction provided by the "shielding" of these features depends on the size of the structure(s), the location of the structure(s) relative to the noise source and receivers, and the frequency content of the noise levels. Natural terrain features, such as hills and dense woods, and man-made features, such as buildings and walls, can significantly alter noise levels. Generally, any large structure blocking the line-of-sight between a noise source and receiver will provide at least a 5dBA reduction in source noise levels at the receiver (Federal Highway Administration [FHWA] 2011). The presence of building structures can substantially reduce noise levels from the exterior to the interior as well. The FHWA's guidelines indicate that modern building construction generally provides an exterior-to-interior noise level reduction of 20 to 35 dBA with closed windows.

b. Fundamentals of Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of Hz. The frequency of a vibrating object describes how rapidly it oscillates. The normal frequency range of most groundborne vibration that can be felt by the human body ranges between less than 1 Hz to 200 Hz (Crocker 2007).

While people have varying sensitivities to vibrations at different frequencies, in general, they are most sensitive to low-frequency vibration. Vibration in buildings, such as that from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise is usually only a problem when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz), or when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (Federal Transit Administration [FTA] 2018). Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost never annoying to people who are outdoors. The primary concern of vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Descriptors

Vibration amplitudes are usually expressed in peak particle velocity (PPV). PPV is normally described in inches per second (in/sec). PPV is defined as the maximum instantaneous positive or negative peak of a vibration signal. PPV is often used in monitoring of construction and blasting vibration because it is related to the stresses that are experienced by buildings (Caltrans 2020).

Propagation

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish much more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source. Variability in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2020). When a building is exposed to vibration, a ground-to-foundation coupling loss (the loss that occurs when energy is transferred from one medium to another) will usually reduce the overall vibration level. However, under rare circumstances, which depend on certain geologic properties of the soil and physical properties of the building structure, such as mass, stiffness, and orientation of the structure to the vibration source,

the ground-to-foundation coupling may amplify the vibration level due to structural resonances of the floors and walls.

c. Sensitive Receptors

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. According to the Burbank2035 General Plan Noise Element, residential areas, hospitals, convalescent and day care facilities, schools, and libraries are considered noise-sensitive land uses (City of Burbank 2013).

Vibration-sensitive receptors, which are similar to noise-sensitive receptors, include residences and institutional uses, such as hospitals, schools, and churches. However, vibration-sensitive receptors also include buildings where vibrations may interfere with vibration-sensitive equipment that is affected by vibration levels that may be well below those associated with human annoyance (e.g., recording studios or medical facilities with sensitive equipment). Other uses that may have particular sensitivity to groundborne vibration include historic sites and structures.

Sensitive receptors in the Burbank Media District Specific Plan Area (hereafter referred to as "Specific Plan Area") include residential areas (single-family and multifamily), schools (Providence High School and the Burbank Montessori Academy), hospitals (Providence Saint Joseph Medical Center buildings), churches (All Souls Church, Valley Baptist Church, and New Hope Church), and daycare facilities (Disney Children's Center Preschool and Bright Horizons at Burbank + Back-Up Care). In addition, the various media and entertainment company studios within the Specific Plan Area can be considered sensitive receptors due to the sensitivity of these uses to intrusive noise and vibration. Also, refer to Section 4.4, *Cultural Resources*, for a discussion of historic properties in the Specific Plan Area, which may be sensitive to increases in vibration levels.

d. Existing Conditions

Noise Sources

The Specific Plan Area is affected by a variety of noise sources, including mobile and stationary sources. According to the Burbank2035 General Plan Noise Element, the most prevalent noise source in the City, including the Specific Plan Area, is vehicular traffic on freeways and arterials. The primary sources of roadway noise in the Specific Plan Area are State Route 134 (SR-134), which bisects the Specific Plan Area from north to south, Interstate 5, and other arterial roadways, such as West Olive Avenue, West Alameda Avenue, West Riverside Drive, North Pass Avenue, and North Hollywood Way. According to the baseline traffic noise contour map in the Burbank2035 General Plan Noise Element, land uses along freeways and major arterial roadways are exposed to noise levels of 70 dBA CNEL and above.

Other noise sources include those associated with general residential activities, such as landscaping, conversations, and trash pickup. In addition, single, periodic noise events, such as "…explosions, vehicle operations, loudspeakers, and mechanical equipment…," are generated by movie and television studios specifically in the Specific Plan Area (City of Burbank 2013).

Ambient Noise Measurements

To characterize ambient noise levels in the Specific Plan Area, six short-term (15-minute) noise level measurements were conducted on April 10, 2024. The approximate noise measurement locations are shown on Figure 4.11-2. Short-term noise measurement (ST)1 was conducted near the western

Figure 4.11-2 Approximate Noise Measurement Locations



Specific Plan Area boundary along West Riverside Drive to capture noise levels attributable to this roadway; ST2 was conducted along West Olive Avenue near its intersection with North Screenland Drive to capture noise levels attributable to West Olive Avenue; ST3 was conducted at the cul-de-sac between South Fairview Street and Teal Court to capture noise levels attributable to SR-134; ST4 was conducted along West Alameda Avenue near its intersection with South Frederic Street to capture noise levels attributable to West Alameda Avenue; ST5 was conducted northeast of the intersection of Bob Hope Drive and Parkside Avenue to capture ambient noise levels in this area; and ST6 was conducted along the alley between North Maple Street and North Kenwood Street to capture ambient residential noise levels in this area.

Table 4.11-1 summarizes the results of the short-term noise measurements, and Table 4.11-2 lists the recorded traffic volumes observed during the short-term noise measurements. Refer to Appendix G for noise measurement data and field notes.

Table 4.11-1 Short-Term Noise Level Measurement Results

Measurement Location	Measurement Location	Sample Times[1]	Approximate Distance to Primary Noise Source	L_{eq} (dBA)	L_{min} (dBA)	L_{max} (dBA)
ST1	Along W Riverside Dr between N Valley St and N Rose St	4:38 p.m. – 4:53 p.m.	Approximately 40 ft from W Riverside Dr centerline	67.2	50.6	77.7
ST2	Along W Olive Ave between N Kenwood St and N Screenland Dr	5:03 p.m. – 5:18 p.m.	Approximately 18 ft from W Olive Ave southbound centerline	74.7	55.6	89.6
ST3	At cul-de-sac between S Fairview St and Teal Ct	5:24 p.m. – 5:39 p.m.	Approximately 79 ft from SR-134 eastbound centerline	64.0	60.0	70.3
ST4	Along W Alameda Ave near its intersection with S Frederic St	5:46 p.m. – 6:01 p.m.	Approximately 34 ft from W Alameda Ave centerline	69.0	52.3	88.4
ST5	In grassy area northeast of intersection of Bob Hope Dr and Parkside Ave	6:08 p.m. – 6:23 p.m.	Approximately 126 ft from Bob Hope Dr centerline	51.9	48.6	60.1
ST6	Along alleyway between N Maple St and N Kenwood St	6:36 p.m. – 6:51 p.m.	Approximately 168 feet from N Maple St centerline	56.5	52.0	71.6

dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; L_{min} = minimum sound level, L_{max} = maximum sound level

[1] All short-term noise measurements were collected on April 10, 2024.

Noise measurement data and field notes included as Appendix G.

Table 4.11-2 Traffic Counts Collected During Short-Term Noise Measurements

Measurement	Roadway	Traffic	Autos	Medium Trucks	Heavy Trucks
ST1	W Riverside Dr	15-minute count	350	9	0
		One-hour equivalent	1,400	36	0
Percent			**97.5%**	**2.5%**	**0%**
ST2	W Olive Ave	15-minute count	600	3	2
		One-hour equivalent	2,400	12	8
Percent			**99.2%**	**0.5%**	**0.3%**
ST3	Cul-de-sac	15-minute count	2	0	0
		One-hour equivalent	8	0	0
Percent			**100%**	**0%**	**0%**
ST4	W Alameda Ave	15-minute count	360	4	0
		One-hour equivalent	1,440	16	0
Percent			**98.9%**	**1.1%**	**0%**
ST5	Bob Hope Dr	15-minute count	100	3	0
		One-hour equivalent	400	12	0
Percent			**97.1%**	**2.9%**	**0%**
ST6	Alleyway	15-minute count	0	0	0

Vibration Sources

Sources of vibration in the City are also dominated by vehicular movement. As with mobile-source noises, vibration by vehicular movement generally affects numerous receptors along lengths of roadways and depends on pavement and type and weight of the vehicle. Vibration may also be generated by construction equipment (e.g., earth-moving equipment and pile driving); however, these sources are temporary and would vary on a project-by-project basis. In addition, commercial activities may generate vibration from the use of medium-duty and heavy-duty truck travel on nearby roadways.

4.11.2 Regulatory Setting

a. Federal

United States Department of Housing and Urban Development

The United States Department of Housing and Urban Development (HUD) has set exterior and interior noise goals in Title 24 of the Code of Federal Regulations, Part 51 (24 CFR Part 51) for HUD programs. HUD specifies desirable maximum exterior and interior noise standards of 65 and 45 dBA L_{dn}, respectively, for residential units developed under HUD funding. It is assumed that standard construction of residential dwellings typically provides a minimum exterior-to-interior noise reduction of 20 dBA with the windows closed.

Federal Transit Administration

The FTA provides criteria for assessing construction noise impacts based on the potential for adverse community reaction for various land use types in the *Transit Noise and Vibration Impact Assessment*

Manual (FTA 2018). These thresholds are commonly used for assessing construction noise impacts under CEQA in jurisdictions that have not adopted quantitative thresholds. Based on FTA recommendations, the daytime (i.e., 7:00 a.m. to 10:00 p.m.) construction noise limit for residential uses is 80 dBA L_{eq} (8-hour).

The *Transit Noise and Vibration Impact Assessment Manual* also includes criteria for assessing vibration impacts during construction, which are shown in Table 4.11-3. The thresholds shown in Table 4.11-3 represent the limits at which minor architectural damage (i.e., non-structural) may occur to structures of various construction types.

Table 4.11-3 FTA Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced concrete, steel, or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Nonengineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12

PPV = peak particle velocity; in/sec = inches per second

Source: FTA 2018

In addition to the vibration limits for building damage shown above, the *Transit Noise and Vibration Impact Assessment Manual* also includes criteria for assessing vibration impacts to humans, as levels of vibration can be felt or heard well below the levels that produce any damage to structures. The frequency of and duration of a vibration event both have an effect on human response. Generally, as the duration and frequency of vibration events increase, the potential for adverse human response increases. The general human responses to varying levels of groundborne vibration velocity levels are presented in Table 4.11-4.

Table 4.11-4 FTA Vibration Annoyance Criteria

Vibration Velocity Level	Human Reaction
65 VdB	Approximate threshold of perception for many people.
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find transit vibration at this level annoying.
85 VdB	Vibration acceptable only if there are an infrequent[1] number of events per day.

VdB = vibration decibels

[1] "Infrequent" number of events is defined as fewer than 30 events per day.

Source: FTA 2018.

Occupational Health and Safety Administration

The federal government regulates occupational noise exposure common in the workplace through the Occupational Health and Safety Administration (OSHA) under the United States Department of Labor. Noise limitations would apply to the operation of construction equipment and could also apply to any proposed industrial land uses. Noise exposure of this type is dependent on work conditions and is addressed through a facility's Health and Safety Plan, as required under OSHA, and is not addressed further in this analysis.

b. State

California General Plan Guidelines

State law requires general plans to include a Noise Element under Government Code Section 65302(f). The California General Plan Guidelines, published by the Governor's Office of Planning and Research, indicate acceptable, specific land use types in areas with specific noise exposure. The guidelines also offer adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution. These guidelines are advisory, and local jurisdictions have the authority to set specific noise standards based on local conditions.

California Building Code

The California Building Code is Title 24 of the California Code of Regulations. The 2022 California Building Code Part 2, Volume 1, Chapter 12, Section 1206.4, *Allowable interior noise levels*, requires that interior noise levels attributable to exterior sources shall not exceed 45 dB in any habitable room. The noise metric is evaluated as either the L_{dn} or the CNEL, consistent with the noise element of the local general plan. The California Building Code does not include an exterior standard but generally accepts HUD's maximum exterior standard of 65 dBA L_{dn} for residential units.

California Building Code: California Green Building Standards Code

The State of California's noise insulation standards for nonresidential uses are codified in the California Code of Regulations, Title 24, Building Standards Administrative Code, Part 11, California Green Building Standards (CALGreen) Code. The CALGreen Code noise standards are applied to new or renovation construction projects in California to control interior noise levels resulting from exterior noise sources. Proposed projects may use either the prescriptive method (Section 5.507.4.1) or the performance method (Section 5.507.4.2) to show compliance. Under the prescriptive method, a project must demonstrate transmission loss ratings for the wall and roof-ceiling assemblies and exterior windows when located within a noise environment of 65 dBA CNEL or higher. Under the performance method, a project must demonstrate that interior noise levels do not exceed 50 dBA L_{eq}(1-hour).

c. Local

Burbank2035 General Plan

The Burbank2035 General Plan contains a Noise Element, which "…describes the existing noise environment in the City of Burbank (hereafter referred to as "City" or "Burbank"), identifies noise sources and problems affecting community safety and comfort, and establishes policies and programs that limit community exposure to excessive noise levels" (City of Burbank 2013). The following goals and policies from the Noise Element are applicable to the proposed Project:

Goal 1: Noise Compatible Land Uses. Burbank's diverse land use pattern is compatible with current and future noise levels.

- **Policy 1.1** Ensure the noise compatibility of land uses when making land use planning decisions.
- **Policy 1.2** Provide spatial buffers in new development projects to separate excessive noise-generating uses from noise-sensitive uses.

Policy 1.3 Incorporate design and construction features into residential and mixed-use projects that shield residents from excessive noise.

Policy 1.4 Maintain acceptable noise levels at existing noise-sensitive land uses.

Policy 1.5 Reduce noise from activity centers located near residential areas, in cases where noise standards are exceeded.

Policy 1.6 Consult with movie studios and residences that experience noise from filming activities to maintain a livable environment.

Goal 2: Noise in Mixed-Use Development. Noise from commercial activity is reduced in residential portions of mixed-use projects.

Policy 2.1 Require the design and construction of buildings to minimize commercial noise within indoor areas of residential components of mixed-use projects.

Policy 2.2 Locate the residential portion of new mixed-use projects away from noise-generating sources such as mechanical equipment, gathering places, loading bays, parking lots, driveways, and trash enclosures.

Goal 3: Vehicular Traffic Noise. Burbank's vehicular transportation network reduces noise levels affecting sensitive land uses.

Policy 3.1 Support noise-compatible land uses along existing and future roadways, highways, and freeways.

Policy 3.2 Encourage coordinated site planning and traffic management that minimize traffic noise affecting noise-sensitive land uses.

Policy 3.3 Advocate the use of alternative transportation modes such as walking, bicycling, mass transit, and non-motorized vehicles to minimize traffic noise.

Policy 3.4 Install, maintain, and renovate freeway and highway right-of-way buffers and sound walls through continued work with Caltrans and Los Angeles County Metropolitan Transportation Authority (MTA).

Policy 3.5 Monitor noise levels in residential neighborhoods and reduce traffic noise exposure through implementation of the neighborhood protection plans.

Policy 3.6 Prohibit heavy trucks from driving through residential neighborhoods.

Policy 3.7 Where feasible, employ noise-cancelling technologies such as rubberized asphalt, fronting homes to the roadway, or sound walls to reduce the effects of roadway noise on sensitive receptors.

Goal 6: Industrial Noise. Noise generated by industrial activities is reduced in residential areas and at noise-sensitive land uses.

Policy 6.1 Minimize excessive noise from industrial land uses through incorporation of site and building design features.

Policy 6.2 Require industrial land uses to locate vehicular traffic and operations away from adjacent residential areas.

Goal 7: Construction, Maintenance, and Nuisance Noise. Construction, maintenance, and nuisance noise is reduced in residential areas and at noise-sensitive land uses.

- **Policy 7.1** Avoid scheduling city maintenance and construction projects during evening, nighttime, and early morning hours.
- **Policy 7.2** Require project applicants and contractors to minimize noise in construction activities and maintenance operations.
- **Policy 7.3** Limit the allowable hours of construction activities and maintenance operations located adjacent to noise-sensitive land uses.
- **Policy 7.4** Limit the allowable hours of operation for and deliveries to commercial, mixed-use, and industrial uses located adjacent to residential areas.

Furthermore, page 5-16 of the Bubank2035 General Plan contains regulations pertaining to construction noise, recognizing construction as a necessary part of community development. Consistent with the provisions of the City's Municipal Code (discussed in the following section), construction noise occurring between 7:00 a.m. and 7:00 p.m. on Mondays through Fridays and between 8:00 a.m. and 5:00 p.m. on Saturdays is exempt from the City's applicable noise standards. If occurring within these allowable days and hours, construction activities are deemed an acceptable public nuisance.

In addition, the Noise Element establishes land use compatibility standards for transportation and stationary noise sources, presented in Table 4.11-5 and Table 4.11-6, respectively.

Table 4.11-5 Maximum Allowable Noise Exposure – Transportation Sources

Land Use Category	Exterior Normally Acceptable[1] (dBA CNEL/L_{dn})	Exterior Possibly Acceptable[2] (dBA CNEL/L_{dn})	Exterior Normally Unacceptable[3] (dBA CNEL/L_{dn})	Interior Acceptable[4] (dBA CNEL/L_{dn} except where noted)
Residential, single-family	Up to 60	61–70	71 and higher	45
Residential, multi-family	Up to 65	66–70	71 and higher	45
Residential, multi-family mixed-use	Up to 65	61–70	71 and higher	45
Transient lodging	Up to 65	61–70	71 and higher	45
Hospitals; nursing homes	Up to 60	61–70	71 and higher	45
Theaters; auditoriums; music halls	Up to 60	61–70	71 and higher	35 dBA L_{eq}[5]
Churches; meeting halls	Up to 60	61–70	71 and higher	40 dBA L_{eq}
Playgrounds; neighborhood parks	Up to 70	71–75	75 and higher	–
Schools; libraries; museums[6]	–	–	–	45 dBA L_{eq}
Offices[7]	–	–	–	45 dBA L_{eq}
Retail/commercial	–	–	–	–
Industrial	–	–	–	–

dBA = A-weighted decibels; CNEL = Community Noise Equivalent Level; L_{dn} = Day-Night Average Sound Level; L_{eq} = equivalent continuous sound level

[1] Normally acceptable means that land uses may be established in areas with the stated ambient noise level, absent of any unique noise circumstances.

[2] Possibly acceptable means that land uses should be established in areas with the stated ambient noise level only when exterior areas are omitted from the project or noise levels in exterior areas can be mitigated to the normally acceptable level.

[3] Normally unacceptable means that land uses should generally not be established in areas with the stated ambient noise level. If the benefits of the project in addressing other Burbank2035 goals and policies outweigh concerns about noise, the use should be established only where exterior areas are omitted from the project or where exterior areas are located and shielded from noise sources to mitigate noise to the maximum extent feasible.

[4] Interior acceptable means that the building must be constructed so that interior noise levels do not exceed the stated maximum, regardless of the exterior noise level. Stated maximums are as determined for a typical worst-case hour during periods of use.

[5] dBA L_{eq} is as determined for a typical worst-case hour during periods of use.

[6] Within the Airport Influence Area, these uses are not acceptable above 65 dBA CNEL if subject to the City's discretionary review procedures.

[7] Within the Airport Influence Area, these uses may be acceptable up to 75 dBA CNEL following review for additional noise attenuation; in excess of 75 dBA CNEL, these uses are not acceptable.

Source: Burbank2035 General Plan Noise Element, Table N-3 (City Burbank 2013).

Table 4.11-6 Maximum Allowable Noise Exposure - Stationary Noise Sources

Noise Source	Noise Level Descriptor	Exterior Spaces[2] – Daytime (7 a.m. to 10 p.m.)	Exterior Spaces[2] – Nighttime (10 p.m. to 7 a.m.)
Typical	Hourly dBA L_{eq}	55[1]	45[1]
Tonal, impulsive, repetitive, or consisting primarily of speech or music	Hourly dBA L_{eq}	50[1]	40[1]
Any	dBA L_{max}	75	65

dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level; L_{max} = maximum sound level

[1] The City may impose noise level standards that are more or less restrictive than those specified above based upon determination of existing low or high ambient noise levels.

[2] Where the location of exterior spaces (i.e., outdoor activity areas) is unknown, the exterior noise level standard shall be applied to the property line of the receiving land use. Where it is not practical to mitigate exterior noise levels at patio or balconies of apartment complexes, a common area such as a pool or recreation area may be designated as the exterior space.

Source: Burbank2035 General Plan Noise Element, Table N-4 (City of Burbank 2013).

In addition to these maximum allowable noise exposure standards, for analysis of noise impacts and determining appropriate mitigation under CEQA, an increase in ambient noise levels is assumed to be a significant noise impact if a project causes ambient noise levels to exceed the following (City of Burbank 2013):

- Where the existing ambient noise level is less than 60 CNEL/L_{dn}, a project-related permanent increase in ambient noise levels of 5 CNEL/L_{dn} or greater.
- Where the existing ambient noise level is greater than 60 CNEL/L_{dn}, a project-related permanent increase in ambient noise levels of 3 CNEL/L_{dn} or greater.

The Burbank2035 General Plan also contains a Plan Realization Element, which aims to guide "…City elected officials, commission and committee members, staff, and the public in the overall effort to put into practice adopted Burbank2035 goals and policies" (City of Burbank 2013). The following noise programs from the Plan Realization Element are applicable to the proposed Project:

Program N-5: Vehicle Noise Reduction. Implement the following strategies to reduce vehicular traffic noise throughout the city:

- Review and designate local truck routes to reduce truck traffic in noise-sensitive land use areas.
- Use alternative paving materials, such as rubberized asphalt, to reduce traffic noise where determined feasible and cost efficient.

Program N-6: Construction Noise. Require contractors to implement the following measures during construction through contract provisions and/or conditions of approval as appropriate:

- Maintain construction equipment per manufacturers' specifications and fit equipment with the best available noise suppression devices (e.g., mufflers, silencers, wraps).
- Shroud or shield all impact tools and muffle or shield all intakes and exhaust ports on power equipment.
- Comply with the operational hours outlined in the Burbank Noise Control Ordinance or mitigate noise at sensitive land uses to below Noise Control Ordinance standards during all construction operations and related activities associated with a proposed project.

- Prohibit idling of construction equipment for extended periods of time in the vicinity of noise-sensitive receptors.
- Locate fixed and/or stationary equipment (e.g., generators, compressors, rock crushers, cement mixers) as far as possible from noise-sensitive receptors.
- Shroud or shield all impact tools and muffle or shield all intakes and exhaust ports on powered construction equipment.
- Place temporary barriers, where feasible, as close to the noise source or as close to the receptor as possible and break the line of sight between the source and receptor where modeled levels exceed applicable standards. Acoustical barriers shall be constructed of material having a minimum surface weight of 2 pounds per square foot or greater and a demonstrated Sound Transmission Class rating of 25 or greater as defined by American Society for Testing and Materials Test Method E90. Placement, orientation, size, and density of acoustical barriers shall be specified by a qualified acoustical consultant.

Program N-9: Mixed-Use Noise Notification Requirement. Notify residents in mixed-use projects located adjacent to commercial or retail land uses that they could be affected by noise from adjacent uses.

City of Burbank Municipal Code

Title 9, Chapter 3, Article 2 (Noise Control) of the City of Burbank Municipal Code (BMC) sets standards for ambient noise levels based on zone type. Specifically, Section 9-3-208.A of the BMC prohibits the operation of "…any machinery, equipment, pump, fan, air conditioning apparatus, or similar mechanical device…" in such a manner as to cause the ambient noise level at an adjacent noise-sensitive property to be exceeded by more than 5 dBA. In the case of leaf blowers, the ambient noise level may not be exceeded by more than 20 dBA. These ambient noise level limits are shown in Table 4.11-7.

Table 4.11-7 Ambient Noise Base Levels

Zone	Time	Base Levels (dBA)
Residential	Nighttime (10:00 p.m. to 7:00 a.m.)	45
Residential	Daytime (7:00 a.m. to 10:00 p.m.)	55
Commercial	Anytime	65
All Other Zones	Anytime	70

Source: BMC Section 9-3-208.B

The BMC also designates hours of construction applicable to all construction, alteration, movement, enlargement, replacement, repair, equipment, maintenance, removal and demolition work. Section 9-1-1-105.10 of the BMC prohibits construction activity between 7:00 p.m. and 7:00 a.m., Mondays through Fridays; between 5:00 p.m. and 8:00 a.m. on Saturdays; and at any time on Sundays or City holidays.

According to Article 21, *Media District Overlay Zone*, Section 10-1-2140.A of Title 10, Chapter 1 of the BMC, certain notices regarding noise and vibration must be given to studios listed in the BMC. Specifically, "[w]ritten notice shall be given to the appropriate studio whenever any activity is proposed which may create noise levels which exceed 90 dB within 100 feet of studio property." In addition, "…written notice shall be given of any activity involving jackhammers, and similar equipment

which causes vibrations, within 500 feet of any studio. This notice shall be provided at least two (2) weeks in advance of the start of these activities. Permits for these activities shall not be granted without proof of this notice." Section 10-1-2140.B states that "[s]tudios shall provide appropriate advance notice to surrounding residents when studio activities have the potential to adversely impact adjacent neighborhoods."

4.11.3 Impact Analysis

a. Thresholds of Significance

Thresholds of significance are based on Appendix G of the CEQA Guidelines, which states that noise impacts of the proposed Project would be significant if the proposed Project would:

1. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
2. Generate excessive groundborne vibration or groundborne noise levels.
3. For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.

Thresholds 1 and 2 are analyzed below.

Construction Noise

The City does not specify a quantitative noise level threshold for assessing construction noise impacts; therefore, noise limits established by the FTA in the *Transit Noise and Vibration Assessment Manual* were used to determine whether construction associated with buildout of the proposed Project would result in a substantial temporary increase in noise levels and to provide a comprehensive environmental review. The FTA establishes a daytime noise threshold of 80 dBA L_{eq} over an eight-hour period at receiving residential land uses.

As discussed above in Section 4.11.2, the City deems daytime construction activities conducted within its allowable days and times as an acceptable public nuisance; therefore, a significant impact would occur if construction were to take place outside of the City's allowable hours described in Section 9-1-1-105.10 of the BMC, which are between 7:00 a.m. and 7:00 p.m. on Mondays through Fridays and between 8:00 a.m. and 5:00 p.m. on Saturdays. Additionally, construction activity that would generate noise levels of 90 dB within 100 feet of a BMC-designated studio property (i.e., the Disney, the Warner Bros., and the NBC Studio sites) in the Specific Plan Area must comply with Section 10-1-2140.A of the BMC, which requires written notice to be provided at least two weeks prior to the start of such activities.

Operational Noise

Operational Stationary Noise

The City has adopted noise standards in the General Plan and BMC that regulate on-site operational noise sources in the City. Future development projects facilitated by the proposed Project would result in a significant impact if it would introduce new on-site noise sources that would generate noise exceeding the limits shown in Table 4.11-7 above.

Traffic Noise

Traffic noise would result in a significant impact if future development projects facilitated under the proposed Project would cause ambient noise levels to exceed the following (City of Burbank 2013):

- Where the existing ambient noise level is less than 60 CNEL/L_{dn}, a Project-related permanent increase in ambient noise levels of 5 CNEL/L_{dn} or greater.
- Where the existing ambient noise level is greater than 60 CNEL/L_{dn}, a Project-related permanent increase in ambient noise levels of 3 CNEL/L_{dn} or greater.

Land Use Compatibility

According to the City's land use compatibility standards shown in Table 4.11-5, an ambient noise environment up to 60 dBA CNEL is normally acceptable for single-family residences, whereas an ambient noise environment up to 65 dBA CNEL is normally acceptable for multi-family residences. In addition, an ambient noise environment up to 70 dBA CNEL is possibly acceptable for all residences. These standards also establish maximum interior noise level limits for new residential development, requiring that sufficient noise insulation be provided to maintain interior noise levels below 45 dBA CNEL (City of Burbank 2013).

Agencies subject to CEQA generally are not required to analyze the impact of existing environmental conditions on a project's future users or residents. In *California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal. 4th 369*, the California Supreme Court explained that an agency is only required to analyze the potential impacts to future residents if the project would exacerbate those existing environmental hazards or conditions. CEQA analysis is, therefore, concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents. Therefore, bringing a population into an area where noise currently exists is not a significant environmental impact under CEQA unless doing so would exacerbate noise conditions. Noise impacts related to land use compatibility are not further evaluated in this analysis.

Groundborne Vibration

The City does not specify quantitative construction vibration thresholds; therefore, the limits established by the FTA, shown in Table 4.11-3 and Table 4.11-4, were used to determine the significance of vibration impacts to buildings and sensitive receptors, respectively, during construction. For construction vibration impacts to building structures, a significant impact would occur if construction of future development projects facilitated by the proposed Project would generate vibration levels exceeding 0.2 in/sec PPV at residential structures and 0.3 in/sec PPV at modern industrial/commercial structures, which are the limits where minor cosmetic damage may occur to these building types. For sites with extremely fragile historic buildings, vibration impacts were evaluated against a threshold of 0.12 in/sec PPV. For construction vibration impacts to human receptors, a significant impact would occur if construction of future development projects facilitated by the proposed Project would generate vibration levels exceeding 85 VdB at nearby sensitive receptors, which is the limit that is acceptable only if there are an infrequent number of events (i.e., less fewer than 30 events per day).

In addition, any construction activity which may generate vibration within 500 feet of a BMC-designated studio in the Specific Plan Area must comply with Section 10-1-2140.A of the BMC, which requires written notice to be provided at least two weeks prior to the start of such activities.

b. Effects Found Not to be Significant

Threshold 3 was determined to have no impact and, therefore, is discussed under Section 4.19, *Effects Found Not to be Significant and* summarized below.

The Specific Plan Area is not within or near any Airport Influence Area defined by the Los Angeles County Airport Land Use Plan, including the Hollywood Burbank Airport (Los Angeles County Airport Land Use Commission 2004). Because the Specific Plan Area is not located within any airport's Airport Influence Area or the 65 CNEL or higher noise contours, future development projects under the proposed Project would not expose people residing or working in the Specific Plan Area to excessive noise levels and no impact would occur.

c. Methodology

The following sections describe the methodology used to evaluate the significance of potential noise and vibration impacts during construction and operation of future development projects under the proposed Project.

In accordance with *CEQA Guidelines* Section 15125, "a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence" where necessary to provide the most accurate description of the existing conditions. As such, due to the preparation time needed to complete the Draft Specific Plan and Draft EIR, this section utilizes the Transportation Impact Analysis prepared by Fehr and Peers dated March 11, 2025, in order to provide a more accurate present-day baseline.

Construction Noise

Construction of development facilitated by implementation of the proposed Project would generate temporary levels of increased noise at receptors located near construction sites. Construction equipment can be considered to operate in two modes: stationary and mobile. Stationary equipment operates in a single location for one or more days at a time, with either fixed-power operation (e.g., pumps, generators, and compressors) or variable-power operation (e.g., pile drivers, rock drills, and pavement breakers). Mobile equipment moves around a construction site with power applied in cyclic fashion, such as bulldozers, graders, and loaders. Each phase of construction has its own noise characteristics due to specific equipment mixes; some will have higher continuous noise levels while others may have intermittent, higher instantaneous noise levels. Therefore, construction noise levels may fluctuate depending on the type of equipment being used, construction phase, and/or equipment location. Typically, grading activities generate the highest noise levels because grading involves the largest equipment and covers the greatest area.

Variation in power imposes difficulty in characterizing the noise source level from construction equipment. Power variation is accounted for by describing the noise level at a reference distance from the equipment operating at full power and adjusting it based on the duty cycle of the activity to determine the L_{eq} of the operation (FHWA 2006). It is very common for a programmatic analysis, such as the evaluation of noise impacts related to the implementation of the proposed Project, to utilize a conservative standard reference distance of 50 feet; conversely, project-specific noise analyses related to each future development project under the proposed Project might use more specific distances and information. Note that it is typically uncommon for multiple pieces of heavy equipment to be operating together so close to a nearby property line for extended periods of time.

Construction of future development projects facilitated by the proposed Project would include typical heavy-duty equipment, such as bulldozers, excavators, front-end loaders, dump trucks, and graders.

It is assumed that diesel engines would power all construction equipment. Construction equipment would not all operate at the same time or location due to the different tasks performed by each piece of equipment and mobile nature of construction equipment throughout the course of a workday. In addition, construction equipment would not be in constant use during the 8-hour construction day. Construction noise levels were estimated using the FHWA Roadway Construction Noise Model (RCNM) (FHWA 2006). RCNM predicts construction noise levels for a variety of construction operations based on empirical data and the application of acoustical propagation formulas.

Impact devices, such as pile drivers, may be used to drive foundation piles into the ground and may be used during construction of future development projects facilitated by the proposed Project. Although use of pile drivers is uncommon during construction for the type of development facilitated by the proposed Project, this analysis considers the potential for use of this equipment as a conservative analysis as some ground types or subterranean parking facilities may require their use. These devices would typically operate separately from other equipment. Maximum noise levels associated with the types of heavy equipment most likely to be utilized during development associated with the proposed Project are shown in Table 4.11-8 below.

Table 4.11-8 Maximum Noise Levels Produced by Typical Construction Equipment

	Estimated Maximum Noise Levels at Nearest Sensitive Receptors (dBA L_{max})	
Equipment	**50 feet**	**100 feet**
Air Compressor	80	74
Backhoe	80	74
Concrete Mixer	85	79
Concrete Saw	90	84
Dozer	85	79
Dump Truck	84	78
Excavator	85	79
Grader	85	79
Jackhammer	85	79
Loader	80	74
Paver	85	79
Pickup Truck	55	49
Pile-driver (Impact)	95	89
Pile-driver (Sonic)	95	89
Roller	85	79
Scarifier	85	79
Scraper	85	79

Source: FHWA 2006.

Operational Noise

On-site Operational Noise

The primary on-site noise sources associated with operation of future development projects facilitated by the proposed Project, and those discussed in this analysis, would include those associated with standard operation of residential and commercial land uses. These sources could include, but are not limited to, landscape and building maintenance activities, stationary mechanical equipment (e.g., pumps, heating, ventilation, and air conditioning [HVAC] units), and garbage collection activities. It also includes other stationary sources, such as social conversations and amplified music.

Off-site Operational Noise (Traffic)

In addition to on-site operational noise, future development projects accommodated under the proposed Project would generate off-site noise in the form of additional vehicle trips, thereby increasing noise levels on roadways within the Specific Plan Area. Noise increases associated with traffic volume increases were estimated based on peak hour turning movement data for various intersections within the Specific Plan Area provided by Fehr & Peers (Fehr & Peers 2025). Turning movement data were provided for existing and proposed Project conditions. Using this turning movement data, peak hour traffic volumes on roadway segments adjacent to each intersection were calculated by averaging the number of vehicles entering the segment from the intersections on each end of the segment. The afternoon (PM) peak hour turning movement volumes were used as the basis for the noise impact analysis as they were generally higher than the morning (AM) peak hour volumes and, thus, represent a more conservative analysis. Relative changes in traffic volumes on each roadway segment resulting from buildout of the proposed Project were compared with existing traffic volumes to determine the associated noise increase using the following equation:

$$Traffic\ Noise\ Increase = 10 * LOG\ (\frac{Future\ Traffic\ Volumes}{Existing\ Traffic\ Volumes})$$

Groundborne Vibration

Operation of future development projects under the proposed Project would not include any substantial sources of vibration (e.g., use of heavy equipment). Therefore, construction activities would have the greatest potential to generate groundborne vibration affecting sensitive receptors and/or structures adjacent to a construction site, especially during grading, and for construction sites located near a historic site or structure. Typical vibration levels produced by various construction equipment at a reference distance of 25 feet are shown in Table 4.11-9.

Table 4.11-9 Typical Vibration Levels Produced by Various Construction Equipment

Equipment	PPV (in/sec) at 25 Feet	VdB at 25 feet
Impact Pile Driver (upper range)	1.518	112
Sonic Pile Driver (upper range)	0.734	105
Vibratory Roller	0.210	94
Hoe Ram	0.089	87
Large Bulldozer	0.089	87
Caisson Drilling	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

Source: FTA 2018

Because groundborne vibration could cause physical damage to structures and is measured in an instantaneous period, vibration impacts are typically modeled based on the distance from the location of vibration-intensive construction activities, which is conservatively assumed to be the edge of a project site, to the edge of the nearest sensitive off-site structure. Construction vibration levels that could occur due to buildout of the proposed Project are based on reference vibration levels published by the FTA shown in Table 4.11-9.

d. Project Impacts

Threshold 1:	Would the project result in generation of a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Impact NOI-1 CONSTRUCTION ASSOCIATED WITH FUTURE DEVELOPMENT PROJECTS ACCOMMODATED UNDER THE PROPOSED PROJECT WOULD BE REQUIRED TO COMPLY WITH THE CONSTRUCTION DAY AND TIME RESTRICTIONS SPECIFIED IN THE BURBANK MUNICIPAL CODE. DEPENDING ON THE SCOPE OF DEVELOPMENT FACILITATED BY THE PROPOSED PROJECT, CONSTRUCTION MAY INVOLVE LONG DURATIONS, SUBSTANTIAL SOIL MOVEMENT, USE OF LARGE, HEAVY-DUTY EQUIPMENT, AND/OR PILE DRIVING NEAR NOISE-SENSITIVE LAND USES, WHICH MAY PRODUCE NOISE LEVELS THAT EXCEED THE APPLICABLE FTA DAYTIME NOISE LIMITS. IMPLEMENTATION OF MITIGATION MEASURES NOI-1A THROUGH NOI-1I WOULD REDUCE CONSTRUCTION NOISE LEVELS TO BELOW THRESHOLDS; HOWEVER, BECAUSE DETAILS OF FUTURE PROJECT-SPECIFIC CONSTRUCTION ACTIVITIES ARE UNKNOWN AT THIS TIME, TEMPORARY CONSTRUCTION NOISE IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

As explained in Section 2, *Project Description*, future development projects under the proposed Project would result in a net increase of 9,702 residential units and 3,986,207 square feet of non-residential development. This section evaluates potential noise impacts resulting from buildout of the proposed Project.

Construction activity associated with future development projects under the proposed Project would require the use of a variety of noise-generating equipment that would result in temporary increases in ambient noise levels on an intermittent basis. Noise levels generated by construction would vary depending on the construction phase and types of equipment used, the durations of use, distance between the noise source and surrounding receptors, and presence or absence of noise-attenuation

barriers. Typical noise levels at 50 and 100 feet from various equipment types that may be used during construction are shown in Table 4.11-8. The loudest noise levels are typically generated by impact devices (e.g., pile drivers) and heavy-duty equipment (e.g., cranes, scrapers, dozers, and graders). Construction noise would occur intermittently throughout the course of a day, and, in some cases, multiple pieces of equipment may operate simultaneously, thus generating combined noise levels that are incrementally higher than those shown in Table 4.11-8.

Sensitive receptors are located throughout the Specific Plan Area and could be exposed to noise associated with construction activities from future development projects under implementation of the proposed Project. As discussed in Section 4.11.3, sensitive receptors in the Specific Plan Area include residences, schools, hospitals, churches, and media and entertainment company studios. Because specific development projects have not yet been determined at individual sites, this analysis assumes that construction activities would likely occur within 50 feet of sensitive receptors throughout the course of a typical construction day. As shown in Table 4.11-10, sensitive receptors located within 50 feet of the listed typical construction equipment may be exposed to maximum noise levels ranging between 76 and 88 dBA L_{max} and may be exposed to maximum noise levels up to 101 dBA L_{max} if pile drivers are used. Note that these noise levels represent the operation of individual pieces of equipment; however, a typical construction day would likely consist of multiple pieces of equipment operating simultaneously. Therefore, for the purposes of this analysis, a typical scenario consisting of three pieces of equipment (excavator, dozer, and jackhammer) operating simultaneously over the course of an eight-hour workday was evaluated. This scenario was based on equipment typically used during the loudest phases of construction: demolition and grading. The combined noise level at 50 feet generated by simultaneous operation of these three pieces of equipment are shown in Table 4.11-10.

Table 4.11-10 Individual and Combined Construction Noise Levels at 50 Feet Away

Equipment	Individual Noise Level at 50 Feet Away (dBA L_{eq} [8-hour])	Combined Noise Level at 50 Feet Away (dBA L_{eq} [8-hour])
Excavator	76.7	84.2
Dozer	77.7	
Jackhammer	81.9	

dBA = A-weighted decibel; L_{eq} = equivalent continuous sound level

See Appendix G for RCNM results.

As stated previously, construction noise levels would vary depending on the types of equipment used, the durations of use, and the distance from construction activity to nearby receptors. Engine noise reduction technology, including silencers, continues to improve, but heavy construction equipment still generates noise exceeding ambient levels that could cause intermittent annoyance to nearby receptor properties. Noise associated with construction of future development projects within the Specific Plan Area under the proposed Project could exceed the eight-hour 80 dBA L_{eq} daytime significance thresholds at residential land uses.

Compliance with Section 9-1-1-105.10 of the BMC would restrict the timing of construction activities to the hours of 7:00 a.m. to 7:00 p.m., Mondays through Fridays, and 8:00 a.m. and 5:00 p.m. on Saturdays. No construction would be permitted on Sundays or City holidays. As discussed above in Section 4.11.2, construction activities conducted within these allowable days and times would be exempt from the City's noise regulations, as the City acknowledges construction noise is an acceptable temporary public nuisance if conducted during the least noise-sensitive hours of the day. Future

development under the proposed Project would be required to provide notice to nearby studios where activities would occur that may create noise exceeding 90 decibels within 100 feet of certain studio property (e.g., Walt Disney Company, Warner Bros. Discovery, and Burbank Studios) in compliance with the noise notification development standard defined in Title 10, Article 21, Section 10-1-2140 of the BMC. In addition, implementation of and adherence to the following existing policies in the Burbank2035 General Plan Noise Element would ensure continued application of the City's existing timing restrictions on construction activity, or modification of those standard restrictions, as necessary, to protect noise-sensitive receptors:

- **Policy 7.1**: Avoid scheduling city maintenance and construction projects during evening, nighttime, and early morning hours.
- **Policy 7.2**: Require project applicants and contractors to minimize noise in construction activities and maintenance operations.
- **Policy 7.3**: Limit the allowable hours of construction activities and maintenance operations located adjacent to noise-sensitive land uses.

Implementation of Policies 7.1 through 7.3 would reduce construction noise impacts associated with future development projects carried out under the proposed Specific Plan. However, project-level details are not currently available for future development projects that would be facilitated under the proposed Specific Plan. Therefore, it is not possible to determine exact noise levels, locations, or time periods for construction of such projects, or construction noise at adjacent properties. Construction noise levels associated with future development projects under the proposed Specific Plan may exceed the FTA's daytime construction noise limits; therefore, temporary noise impacts associated with construction of future development projects under the proposed Specific Plan would be potentially significant.

Mitigation Measures

The following mitigation measures are required to reduce construction-related noise impacts to sensitive receivers near future development projects under the proposed Project:

NOI-1a Shielding and Silencing

Powered construction equipment (including combustion engines), fixed or mobile, shall be equipped with noise shielding and silencing devices consistent with manufacturer's standards or the Best Available Control Technology. Equipment shall be properly maintained, and the project applicant or owner shall require any construction contractor to keep documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications.

NOI-1b Construction Staging Areas

Construction staging areas shall be located as far from noise-sensitive uses as reasonably possible and feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints.

NOI-1c Smart Back-Up Alarms

Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled

and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.

NOI-1d Equipment Idling

Construction vehicles and equipment shall not be left idling for longer than five minutes when not in use.

NOI-1e Workers' Radios

All noise from workers' radios, including any on-site music, shall be controlled such that they are not audible at off-site noise-sensitive uses.

NOI-1f Use of Driven Pile Systems

Driven (impact), sonic, or vibratory pile drivers shall not be used, except in locations where the underlying geology renders alternative methods infeasible, as determined by a soils or geotechnical engineer and documented in a soils report.

NOI-1g Temporary Sound Barriers

Temporary sound barriers, such as walls or sound blankets, shall be positioned between construction activities and noise-sensitive uses when modeled noise levels from construction equipment exceed applicable standards and have a direct line-of-sight with noise sensitive receivers. Placement, orientation, size, and density of acoustical barriers shall be specified by a qualified acoustical consultant.

NOI-1h Noise Complaint Response

Project applicants shall designate an on-site construction project manager who shall be responsible for responding to any complaints about construction noise. This person shall be responsible for responding to concerns of neighboring properties about construction noise disturbance and shall be available to respond to any construction noise complaints during the hours that construction is to take place. They shall also be responsible for determining the cause of the noise complaint (e.g., bad silencer) and shall require that reasonable measures be implemented to correct the problem. A toll-free telephone number and email address shall be posted in a highly visible manner on the construction site at all times and provided in all notices (mailed, online website, and construction site postings) for receiving questions or complaints during construction and shall also include procedures requiring that the on-site construction manager respond to callers and email messages. The on-site construction project manager shall be required to track complaints pertaining to construction noise, ongoing throughout demolition, grading, and/or construction and shall notify the City's Community Development Director of each complaint occurrence.

NOI-1i Project-Specific Construction Noise Study

A Construction Noise Study, prepared by a qualified noise expert to meet the requirements herein, shall be required for future development projects located within 500 feet of noise-sensitive land uses identified in the Burbank2035 General Plan Noise Element (i.e., residential areas, hospitals, convalescent and day care facilities, schools, and libraries), and that have one or more of the following characteristics:

- Two subterranean levels or more (generally more than 20,000 cubic yards of excavated soil material);
- Construction durations of 18 months or more (excluding interior finishing);
- Use of large, heavy-duty equipment rated 300 horsepower or greater;
- The potential for pile driving; or
- Located within 1,000 feet of other construction projects with overlapping construction schedules.

The Construction Noise Study shall characterize sources of construction noise, quantify noise levels at noise-sensitive uses (i.e., residential areas, hospitals, convalescent and day care facilities, schools, and libraries) and identify measures to reduce noise exposure. The Construction Noise Study shall identify reasonably available noise reduction devices or techniques to reduce noise levels to acceptable levels and/or durations, including through reliance on any relevant federal, state, or local standards or guidelines or accepted industry practices. Noise reduction devices or techniques may include, but not be limited to, silencers, enclosures, sound barriers, and/or placement of restrictions on equipment or construction techniques (e.g., alternative installation methods to pile driving such as cast-in-place systems or pile cushioning). Each measure in the Construction Noise Study shall identify anticipated noise reductions at noise-sensitive land uses.

Project applicants shall be required to comply with all requirements of Mitigation Measures NOI-1a through NOI-1i in addition to any additional requirements identified and recommended by the Construction Noise Study and shall maintain proof that notice of, as well as compliance with, the identified measures have been included in contractor agreements.

Significance After Mitigation

Implementation of Mitigation Measures NOI-1a through NOI-1i, as well as implementation of goals and policies from the City's General Plan, would reduce potential noise impacts during construction activities. While daytime construction activities conducted within the City's allowable days and times would be exempt from applicable noise regulations, there is potential for significant construction noise impacts, particularly if construction activities were to be conducted during evening and/or nighttime hours, when people are more sensitive to noise. Additionally, for construction activities occurring in proximity to multi-story residential buildings, it may not be feasible to mitigate construction noise impacts to upper floors of adjacent noise-sensitive buildings. While Mitigation Measure NOI-1g requires the installation of temporary noise barriers to reduce construction impacts to nearby sensitive receptors, it may not be feasible to mitigate construction noise impacts upon higher floors, as the effectiveness of a noise barrier is dependent on the line-of-sight between a noise source and receiver being blocked. Structural (or other similar) concerns may limit the height of any required barriers such that, even with the presence of a barrier, it would not be feasible to reduce construction noise levels at upper floors of adjacent noise-sensitive buildings. Therefore, construction noise impacts associated with future development projects facilitated under the proposed Specific Plan would remain significant and unavoidable.

Furthermore, implementation of Mitigation Measures NOI-1a through NOI-1i would be site-specific and temporary during construction; therefore, no secondary environmental impacts associated with these measures would occur.

Determination

Significant and unavoidable impact

Threshold 1:	Would the project result in generation of a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Impact NOI-2 OPERATION OF FUTURE DEVELOPMENT PROJECTS FACILITATED BY THE PROPOSED SPECIFIC PLAN WOULD RESULT IN THE ADDITION OF STATIONARY NOISE SOURCES (PRIMARILY HVAC EQUIPMENT) AT DEVELOPMENT SITES AND INCREASES IN TRAFFIC NOISE ALONG ROADWAYS WITHIN THE SPECIFIC PLAN AREA. HOWEVER, OPERATIONAL NOISE IMPACTS ASSOCIATED WITH THESE SOURCES WOULD NOT EXCEED APPLICABLE STANDARDS AND WOULD BE LESS THAN SIGNIFICANT.

Operational Stationary Noise

Based on manufacturer's specifications, a Carrier 38HDR060 split system air conditioner with a sound power level of 72 dBA would generate a noise level of approximately 57 dBA at a distance of seven feet. As shown in Table 4.11-6, the ambient base noise level is 55 dBA during the daytime and 45 dBA during the nighttime for residential-zoned areas. Therefore, in the case where the actual ambient conditions are not known, noise from HVAC equipment could exceed the City's presumed ambient noise conditions when compared to a reference noise level 57 dBA at a distance of seven feet from the HVAC equipment source. However, noise levels from HVAC equipment associated with new development would be comparable to noise levels of HVAC equipment associated with the existing urban environment. Furthermore, the design and placement of new HVAC equipment would be required to comply with Section 9-3-208.A of the BMC, which prohibits noise from any machinery, equipment, pump, fan, air conditioning apparatus from exceeding the ambient noise levels of adjacent noise-sensitive properties by more than 5 dBA. Additionally, on-site equipment would be typically designed such that it would be shielded by sound barriers that block the line-of-sight to sensitive receptors or it would include installation of appropriate noise-muffling devices to reduce noise. Therefore, operational noise impacts associated with on-site sources (such as HVAC equipment) would be less than significant.

Traffic Noise

Implementation of the proposed Specific Plan would allow additional buildout of residential and non-residential land uses within the Specific Plan Area, which would generate new vehicle trips that could incrementally increase the exposure of land uses along roadways to traffic noise generated by future development projects. Traffic noise increases associated with the year 2035 proposed Project conditions were estimated for roadways within the Specific Plan Area. Table 4.11-11 presents a summary of segment volumes and associated noise increases on roadways within the Specific Plan Area.

Table 4.11-11 Traffic Volumes and Associated Noise Increases

Roadway	Segment	Existing	Year 2035 Proposed Project	
		PM Peak Hour Traffic Volume	PM Peak Hour Traffic Volume	Noise Increase (dBA CNEL)
N Hollywood Way	Between Magnolia Blvd and W Verdugo Ave	1,084	1,171	0.3
	Between W Verdugo Ave and W Oak St	991	1,142	0.6
	Between W Oak St and W Alameda Ave	1,034	1,229	0.8
	Between W Alameda Ave and W Riverside Dr	736	1,035	1.5
	Between W Riverside Dr and W Olive Ave	420	751	2.5
W Riverside Dr	Between N Clybourn Ave and Evergreen St/W Alameda Ave	915	987	0.3
	Between Evergreen St/W Alameda Ave and N Pass Ave	356	329	-0.3
	Between N Pass Ave and N Screenland Dr/SR-134 EB On-Ramp	363	278	-1.2
	Between N Screenland Dr/SR-134 EB On-Ramp and N Hollywood Way	432	446	0.1
	Between N Hollywood Way and W Olive Ave	411	356	-0.6
	Between W Olive Ave and S California St	476	454	-0.2
	Between S California St and Bob Hope Dr	375	442	0.7
	Between Bob Hope Dr and S Buena Vista St	761	875	0.6
W Alameda Ave	Between Evergreen St/W Riverside Dr and N Pass Ave	629	723	0.6
	Between N Pass Ave and N Hollywood Way	1,010	1,230	0.9
	Between N Hollywood Way and SR-134 WB Ramps	1,090	1,149	0.2
	Between SR-134 WB Ramps and Lima St	830	943	0.6
	Between Lima St and W Olive Ave	819	961	0.7
	Between W Olive Ave and Bob Hope Dr	691	805	0.7
	Between Bob Hope Dr and S Buena Vista St	877	1,066	0.8
N Pass Ave	Between W Verdugo Ave and W Oak St	434	512	0.7
	Between W Oak St and SR-134 EB Off-Ramp	561	565	<0.1
	Between SR-134 EB Off-Ramp and W Alameda Ave	663	677	0.1
	Between W Alameda Ave and W Riverside Dr	351	362	0.1
	Between W Riverside Dr and W Olive Ave	353	397	0.5

Roadway	Segment	Existing PM Peak Hour Traffic Volume	Year 2035 Proposed Project PM Peak Hour Traffic Volume	Year 2035 Proposed Project Noise Increase (dBA CNEL)
Barham Blvd/W Olive Ave	Between Lakeside Plaza Dr/Forest Lawn Dr and Lakeside Dr	1,434	1,508	0.2
W Olive Ave	Between Lakeside Dr and N Pass Ave	1,570	1,611	0.1
	Between N Pass Ave and N Hollywood Way	1,258	1,288	0.1
	Between N Hollywood Way and W Riverside Dr	649	582	-0.5
	Between W Riverside Dr and Lima St	885	934	0.2
	Between Lima St and S California St	856	956	0.5
	Between S California St and W Alameda Ave	888	1,054	0.7
	Between W Alameda Ave and Buena Vista St	943	1,079	0.6
	Between Buena Vista St and Sparks St	901	998	0.4
W Verdugo Ave	Between N Clybourn Ave and N Pass Ave	505	562	0.5
	Between N Pass Ave and N Hollywood Way	702	762	0.4
	Between N Hollywood Way and N Buena Vista St	649	678	0.2
	Between N Buena Vista St and W Olive Ave	489	521	0.3
Buena Vista St	Between Magnolia Blvd and W Verdugo Ave	789	877	0.5
	Between W Verdugo Ave and W Olive Ave	931	1,058	0.6
	Between W Olive Ave and W Alameda Ave	718	837	0.7
	Between W Alameda Ave and W Riverside Dr	675	726	0.3
Bob Hope Dr	Between W Alameda Ave and Parkside Ave	381	456	0.8
	Between Parkside Ave and SR-134 EB Off-Ramp	382	434	0.5
	Between SR-134 EB Off-Ramp and W Riverside Dr	434	501	0.6
Lima St	Between W Alameda Ave and W Olive Ave	153	286	2.7
Oak St	Between N Pass Ave and N Hollywood Way	158	233	1.7

dBA = A-weighted decibel; CNEL = Community Noise Equivalent Level

Source: Fehr & Peers 2025.

As shown in Table 4.11-11, traffic volumes associated with the year 2035 proposed Project conditions would not result in noise increases above 3.0 dBA CNEL on any roadways within the Specific Plan Area. Traffic noise increases would, therefore, not exceed the City's traffic noise increase thresholds of 5 dBA CNEL/L_{dn} (for ambient noise levels below 60 dBA CNEL/L_{dn}) or 3 dBA CNEL/L_{dn} (for ambient noise levels above 60 dBA CNEL/L_{dn}). Operational noise impacts associated with the proposed Project's off-site noise sources (i.e., traffic) would be less than significant.

Determination

Less than significant impact

Threshold 2:	Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Impact NOI-3 CONSTRUCTION ASSOCIATED WITH FUTURE DEVELOPMENT UNDER THE PROPOSED PROJECT WOULD INTERMITTENTLY GENERATE GROUNDBORNE VIBRATION WITHIN AND ADJACENT TO INDIVIDUAL DEVELOPMENT SITES. IMPLEMENTATION OF MITIGATION MEASURE NOI-2 WOULD REDUCE VIBRATION IMPACTS TO BELOW APPLICABLE THRESHOLDS FOR BUILDING DAMAGE. THEREFORE, IMPACTS RELATED TO VIBRATION WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Construction

Building Damage

Vibration impacts related to building damage would most commonly occur when a future development project uses equipment that generates high vibration levels (e.g., pile drivers and/or vibratory rollers) in close proximity to a historical resource constructed of fragile building materials. These historic structures are typically more sensitive to vibration damage than structures that were built using more modern building techniques and materials. The extent of vibration impacts generated during construction generally depends on the specific construction equipment utilized, the duration of equipment use, and the proximity equipment is operated relative to nearby sensitive receptors. Construction for most developments would require heavy equipment, especially on sites where certain geologic conditions require the use of pile driving. Such heavy equipment may operate within 25 feet of nearby buildings, representing a high potential for vibration impacts. Table 4.11-12 shows vibration levels produced by typical construction equipment at various distances from the equipment source. As shown in Table 4.11-12, construction equipment generating the highest levels of vibration would be pile drivers (producing vibration levels up to 1.518 in/sec PPV at 25 feet) and vibratory rollers (producing vibration levels up to 0.21 in/sec PPV at 25 feet). Vibration levels shown in bolded and underlined text exceed one or more of the FTA building damage criteria shown in Table 4.11-3.

Table 4.11-12 Vibration Levels Produced by Typical Construction Equipment at Various Distances (Building Damage Criteria)

	Vibration Level (in/sec PPV)[1]				
Equipment	**25 Feet**	**50 Feet**	**75 Feet**	**100 Feet**	**125 Feet**
Impact Pile Driver (upper range)	**1.518**[2,3,4]	**0.537**[2,34]	**0.292**[2,3]	**0.190**[2]	**0.136**[2]
Sonic Pile Driver (upper range)	**0.734**[2,3,4]	**0.260**[2,3]	**0.141**[2]	0.092	0.066
Vibratory Roller	**0.210**[2,3]	0.098	0.063	0.046	0.036
Hoe Ram	0.089	0.042	0.027	0.019	0.015
Large Bulldozer	0.089	0.042	0.027	0.019	0.015
Caisson Drilling	0.089	0.042	0.027	0.019	0.015
Loaded Trucks	0.076	0.036	0.023	0.017	0.013
Jackhammer	0.035	0.016	0.011	0.008	0.006
Small Bulldozer	0.003	0.001	<0.001	<0.001	<0.001

in/sec = inches per second; PPV = peak particle velocity

[1] Vibration levels shown in bolded and underlined text exceed one or more of the FTA criteria shown in Table 4.11-3. Superscripts specify the threshold exceeded by each piece of equipment.

[2] Exceeds the 0.12 in/sec PPV FTA damage threshold for extremely fragile historic buildings.

[3] Exceeds the 0.2 in/sec PPV FTA damage threshold for residential structures.

[4] Exceeds the 0.3 in/sec PPV FTA damage threshold for commercial structures.

Source: FTA 2018.

According to the FTA impact criteria for building damage shown in Table 4.11-3, the damage threshold for historic structures (which are most sensitive to impacts from groundborne vibration) is 0.12 in/sec PPV. Groundborne vibration from hoe rams, bulldozers, caisson drilling, loaded trucks, and jackhammers would not exceed the 0.12 in/sec PPV threshold for sensitive historic structures or 0.2 in/sec PPV threshold for residential structures when located 25 feet away from these sources. While groundborne vibration from vibratory rollers would only exceed the building damage threshold for historic and residential structures at 25 feet from the source, vibration levels from pile driving would exceed one or more of the building damage thresholds shown in Table 4.11-3 for historic, residential, and commercial structures.

As discussed in Section 4.4, *Cultural Resources*, there are 203 opportunity site parcels in the Specific Plan Area containing historic-aged resources. Although all buildings would be subject to potential impacts from construction vibration, buildings with historic significance, such as the historic-age resources[1] identified on opportunity sites, , would be the most susceptible to damage via groundborne vibration. The potential for vibration impacts would vary depending on the structural integrity of these historic structures. Therefore, construction vibration impacts related to building damage resulting from future development projects accommodated under the proposed Project would be potentially significant

[1] For purposes of this analysis and consistency with Section 4.4, *Cultural Resources*, a historic-aged resource is any property in the Specific Plan Area that is 45 years or more in age.

Human Annoyance Criteria

In addition to potential building damage, vibration generated during construction has the potential to cause annoyance to human receptors if equipment is operated within certain proximities. Table 4.11-13 shows vibration levels produced by typical construction equipment at various distances from the equipment source. Vibration levels shown in bolded and underlined text exceed the FTA annoyance criteria of 85 VdB.

Table 4.11-13 Vibration Levels Produced by Typical Construction Equipment at Various Distances (Human Annoyance Criteria)

	Vibration Level (VdB)[1]				
Equipment	**25 Feet**	**50 Feet**	**75 Feet**	**100 Feet**	**125 Feet**
Impact Pile Driver (upper range)	**112**	**103**	**98**	**94**	**91**
Sonic Pile Driver (upper range)	**105**	**96**	**91**	**87**	84
Vibratory Roller	**94**	85	80	76	73
Hoe Ram	**87**	78	73	69	66
Large Bulldozer	**87**	78	73	69	66
Caisson Drilling	**87**	78	73	69	66
Loaded Trucks	**86**	77	72	68	65
Jackhammer	79	70	65	61	58
Small Bulldozer	58	49	44	40	37

VdB = vibration decibels

[1] Vibration levels shown in bolded and underlined text exceed the FTA criteria of 75 VdB, shown in Table 4.11-4.

Source: FTA 2018.

As shown in Table 4.11-13, vibration levels generated by most construction equipment types would exceed the FTA's annoyance threshold of 85 VdB at a distance of 25 feet. At a distance of 100 feet and closer, vibration levels from use of pile drivers would exceed the FTA's threshold of 85 VdB. The potential for vibration impacts would vary depending on the construction equipment types used and the distances these equipment types would be used relative to nearby sensitive receptors. Therefore, construction vibration impacts related to human annoyance resulting from future development projects accommodated under the proposed Project would be potentially significant.

Operation

The primary source of operational vibration introduced by development associated with the proposed Project would be vehicular traffic on local roadways, which may generate some level of groundborne vibration. However, according to the FTA *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018) guidance document, rubber tires and suspension systems dampen vibration levels from trucks to a level that is rarely perceptible. Therefore, groundborne vibration resulting from an increased number of vehicles associated with new development within the Specific Plan Area would generally not be perceptible by sensitive receptors and impacts related to operational groundborne vibration would be less than significant.

Mitigation Measure

NOI-2 Vibration Control Plan

Prior to issuance of a building permit for a project requiring any of the following activities, the project applicant shall prepare a groundborne noise and vibration analysis to assess and mitigate potential noise and vibration impacts related to such activities:

- Use of a pile driver within:
  - 135 feet of fragile/historic structures; or
  - 100 feet of non-engineered timber and masonry buildings (e.g., most residential buildings); or
  - 75 feet of engineered concrete and masonry (no plaster).
- Use of a vibratory roller within:
  - 40 feet of fragile/historic structures; or
  - 25 feet of any other structure.
- Use of a dozer (or other similar large earthmoving equipment) within:
  - 20 feet of fragile/historic structures; or
  - 15 feet of any other structure.

This noise and vibration analysis shall be conducted by a qualified and experienced acoustical consultant or engineer. The groundborne noise and vibration analysis shall include measures to ensure that vibration levels shall not exceed FTA architectural damage thresholds (e.g., 0.12 in/sec PPV at fragile/historic structures, 0.2 in/sec PPV at non-engineered timber and masonry buildings, and 0.3 in/sec PPV at engineered concrete and masonry buildings). If vibration levels are expected to exceed any of these thresholds, alternative methods for pile driving (e.g., pile cushioning, drilled piles, cast-in-place systems, etc.) and/or use of alternative equipment types (e.g., use of static rollers in lieu of vibratory rollers, use of lower horsepower earthmoving equipment, etc.) shall be employed. If necessary, construction vibration monitoring during construction activities shall be conducted to verify FTA vibration thresholds are not exceeded.

Additionally, pursuant to Section 10-1-2140.A of the BMC, any activity which may cause vibrations within 500 feet of any BMC- designated studio property within the Specific Plan Area shall be disclosed to said studio at least two weeks prior to the start of vibration-generating activities.

Significance After Mitigation

Mitigation Measure NOI-2 would reduce vibration impacts associated with construction activities utilizing vibratory rollers within 50 feet of a structure or pile drivers (impact or sonic) within 150 feet of a structure. It is anticipated that Mitigation Measure NOI-2 would reduce/control construction such that vibration levels would not exceed the FTA vibration criteria for building damage. Subsequently, reduction of vibration impacts to below the FTA criteria for building damage to historic structures would also reduce potential vibration impacts to below the thresholds for human annoyance. Therefore, the vibration impacts from construction activities related to future development projects under the proposed Project would be less than significant with mitigation.

Furthermore, implementation of Mitigation Measure NOI-2 would be a site-specific analysis; therefore, no secondary environmental impacts associated with this measure would occur.

Determination

Less than significant with mitigation incorporated

4.11.4 Cumulative Impacts

Construction Noise

The geographic scope for cumulative construction noise impacts is the Specific Plan Area plus a 0.25-mile radius around the Specific Plan Area. This geographic scope is appropriate because construction of future development projects facilitated by the proposed Project, in addition to cumulative development in the surrounding areas, could temporarily increase ambient noise levels across the Specific Plan Area if constructed at the same time. A 0.25-mile radius is appropriate as noise attenuates quickly with distance, and this represents a conservative geographic extent within which construction noise impacts may occur.

Cumulative projects that may be constructed simultaneously with future development projects under the proposed Specific Plan could, without mitigation, substantially increase noise levels at sensitive receptors located in the vicinity of future cumulative projects. While unlikely, if construction of multiple, proximate cumulative projects were to occur simultaneously, noise from individual construction projects could combine to create significant cumulative impacts at sensitive receptors located near these construction sites. Although this scenario is unlikely due to how quickly noise attenuates with distance, cumulative construction noise impacts would be significant. As discussed in Impact NOI-1, implementation of Mitigation Measures NOI-1a through NOI-1i and consistency with the goals and policies from the Burbank2035 General Plan Noise Element by any future development projects under the proposed Project would reduce noise generated during construction. While mitigation measures would be implemented to the extent feasible, construction of future development projects facilitated by the proposed Project would result in a considerable contribution to cumulative impacts related to a substantial temporary or permanent increase in ambient noise levels (Threshold 1). Therefore, cumulative construction noise impacts would be significant and unavoidable.

Operational Noise

Stationary Noise

Cumulative operational noise would consist of the combined operational noise of future development projects facilitated by the proposed Project in conjunction with existing and future development in the Specific Plan Area, which would result in potential increases in noise associated with operational sources, such as mechanical equipment (e.g., HVAC equipment), conversations, landscaping equipment, recreational activities, parking, and social gatherings. However, operational noise generated by existing and future development projects would be subject to the noise control regulations of BMC Sections 9-3-203, 9-3-213, 9-3-213.5, and 9-3-224 and the Burbank2035 General Plan noise standards. Compliance with the policies of the Burbank2035 General Plan and the noise regulations of the BMC would minimize the permanent increase in ambient noise levels generated by operational activities associated with cumulative development under the proposed Project. Therefore, cumulative operational noise impacts would be less than significant.

Traffic Noise

Noise generated along roadways within the Specific Plan Area would result in a cumulative increase in noise levels due to increased vehicle volumes associated with future development projects facilitated by the proposed Project and cumulative development within the City in areas adjacent to the Specific Plan Area. As discussed in Impact NOI-1 and shown in Table 4.11-12, the contribution of future development projects under the proposed Project to traffic noise increases along each roadway within the Specific Plan Area would be 3.0 dBA CNEL or less, which would not exceed the City's significance thresholds for traffic noise impacts. However, when combined with cumulative development in the City, cumulative traffic noise impacts associated with future development projects facilitated by the proposed Project may result in traffic noise increases exceeding the City's threshold of 3.0 dBA CNEL and that are cumulatively considerable. There would be no feasible measures of mitigation to reduce noise impacts associated with traffic increases; therefore, cumulative traffic noise impacts associated with the future development projects under the proposed Project would be significant and unavoidable.

Groundborne Vibration

As discussed in Section 4.11.1, vibration generated by human activities, such as construction, is localized and rapidly attenuates with distance. It is possible that construction activities resulting from future development projects facilitated by the proposed Specific Plan would occur at the same time as other development projects near the Specific Plan Area. However, it is unlikely that vibration-generating equipment used for construction of other development projects would operate close enough to the proposed development sites in the Specific Plan Area and the nearest sensitive receptors in the Specific Plan Area such that cumulative vibration impacts at the same receptors or structures would occur. Furthermore, Mitigation Measure NOI-2 would put in place a vibration control plan to reduce vibration impacts associated with individual development projects to below applicable building damage and human annoyance thresholds established by the FTA. Therefore, cumulative vibration impacts associated with future development projects under the proposed Project would be less than significant.

4.12 Population/Housing

This section evaluates the potential environmental impacts related to population and housing associated with the implementation of the proposed Specific Plan. Specifically, this section reviews the proposed Project's impact related to substantial unplanned growth. Other thresholds of significance related to the displacement of existing people or housing are discussed in Section 4.19, *Effects Found Not to be Significant*; therefore, this issue is not studied further herein.

4.12.1 Environmental Setting

Population, housing, and employment data are available on a city, county, regional, and State level. This EIR uses data collected and provided at the city and county level in an effort to focus the analysis specifically on the City of Burbank (hereafter referred to as "City" or "Burbank") and the proposed Project's implications for population and housing growth.

a. City of Burbank

California DOF Estimates

Table 4.12-1 shows the 2024 estimates of population and housing units for Burbank and Los Angeles County (County). Burbank's current (2024) estimated population is 105,603 persons, a 0.1-percent increase from its 2023 population of 105,484 (DOF 2024). The City's population constitutes approximately one percent of the Countywide population of 9,824,091, and the City's 46,457 housing units, 44,415 of which are occupied, constitute approximately 1.3 percent of the County's 3,696,408 total housing units, 3,518,197 of which are occupied (DOF 2024). The average number of people per household based on occupied units in the City in 2024 is estimated at 2.38, which is about 16 percent lower than the Countywide average of 2.79 persons per household in 2024.

Table 4.12-1 2024 Population, Households, and Housing Unit Estimates

	City of Burbank	Los Angeles County
Population	105,603	9,824,091
Housing Units (Total)	46,457	3,696,408
Housing Units (Occupied) [1]	44,415	3,518,197
Persons/Household Ratio[2]	2.38	2.79

[1] Estimated by applying a derived civilian vacancy rate to the estimated civilian housing units. Vacancy rates are based on 2024 DOF data, adjusted to incorporate the directional changes described by the latest available American Community Survey (ACS) data.

[2]This is a ratio of persons (household) to an occupied housing unit.

Source: DOF 2024

SCAG Estimates and Projections

Table 4.12-2 shows the City and County population, housing, and employment, which are estimates and forecasts from the SCAG 2024-2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). Although the SCAG 2024-2050 RTP/SCS was adopted in April 2024, the RTP/SCS utilizes baseline population, housing, and employment data from 2019, as this was the most recent data available at the time of preparation. The SCAG 2024-2050 RTP/SCS did not provide population forecasts at the City-level; thus, the below population baseline information is provided for informational purposes only. The 2024-2050 SCAG RTP/SCS projections indicate an increase in the

City's number of households by 5,300 (12 percent) for an estimated 48,600 households in 2035. This forecasted growth represents 481 new households per year (SCAG 2024). The employment forecasts indicate that there were 2.95 jobs per household in the City in 2019. This ratio is about 89 percent higher than the SCAG estimate of 1.48 jobs per household for Los Angeles County in the same year. This suggests that Burbank is a "jobs rich" community in which more workers commute to the City from other communities for their jobs than residents commute to points outside the City for their jobs. The City's higher ratio in comparison to the County is expected to continue in future years, based on SCAG forecasts.

Table 4.12-2 SCAG Population, Housing, and Employment Forecasts

	2019		2035		2019-2035 Growth	
	City of Burbank	Los Angeles County	City of Burbank	Los Angeles County	City of Burbank	Los Angeles County
Population	107,800	10,046,000	N/A	10,449,000	N/A	4.0% (403,000)
Households	43,300	3,393,000	48,600	3,933,000	12.2% (5,300)	15.9% (540,000)
Employment	127,800	5,031,000	144,600	5,386,000	13.1% (16,800)	7.1% (355,000)

N/A – Not available

Source: SCAG 2024

4.12.2 Regulatory Setting

a. State

Housing Element Law: California Government Code Section 65584(a)(1)

Pursuant to California Government Code Section 65584(a)(1), the California Department of Housing and Community Development (HCD) is responsible for determining the regional housing needs assessment (segmented by income levels) for each region's planning body known as a "council of governments" (COG), SCAG being the COG serving the Southern California area. HCD prepares an initial housing needs assessment and then coordinates with each COG to arrive at the final regional housing needs assessment. To date, there have been five previous housing element update "cycles." California is now in its sixth "housing element update cycle." SCAG's Regional Housing Needs Assessment (RHNA) and the City's General Plan Housing Element are discussed further below.

b. Regional

Regional Housing Needs Assessment

California's Housing Element law requires that a local jurisdiction accommodate a share of the region's projected housing needs for the planning period (i.e., RHNA). The RHNA is important because State law mandates that jurisdictions provide sufficient land to accommodate a variety of housing opportunities for all economic segments of the community. Compliance with this requirement is measured by the jurisdiction's ability to provide adequate land to accommodate the RHNA. SCAG, as the regional planning agency, is responsible for allocating the RHNA to individual jurisdictions within its six counties. For the 2021-2029 Housing Element, the RHNA covers the planning period from October 2021 through October 2029. The RHNA is distributed by income category.

Regional Transportation Plan/Sustainable Communities Strategy

SCAG's RTP/SCS is a long-range regional transportation and land use network plan that looks ahead 20+ years and provides a vision of the region's future mobility and housing needs with economic, environmental, and public health goals. The RTP identifies major challenges, as well as potential opportunities associated with growth, transportation finances, the future of airports in the region, and impending transportation system deficiencies that could result from growth that is anticipated in the region.

On April 4, 2024, SCAG adopted the 2024-2050 RTP/SCS, which is an update to the previous 2020-2045 RTP/SCS (SCAG 2024). Using growth forecasts and economic trends, the 2024-2050 RTP/SCS provides a vision for transportation throughout the region through 2050 that achieves the statewide reduction targets and in so doing identifies the amount and location of growth expected to occur within the region.

c. Local Regulations

Measure One

In 2020, Burbank City Council members voted to extend a residential growth management ordinance, known as Measure One, for an additional 10 years, through January 1, 2030. The initiative was first approved by the City in 1989 as a residential growth management measure that prohibits the City from increasing the number of allowed residential units beyond 63,704 units.

The maximum number of residential units allowed under the 1988 General Plan Land Use Element was 63,704 units, which assumed maximum build out of all parcels. However, in 2013, City officials adopted the Burbank2035 General Plan, which superseded the 1988 General Plan Land Use Element and established a new cap on units, restricting the number to 61,647 units, 2,057 fewer than what was established originally under Measure One.

Burbank2035 General Plan

The City of Burbank General Plan (also known as the Burbank2035), adopted by the Burbank City Council in 2013, provides clear and detailed descriptions of the City's official goals and policies across a comprehensive range of topics. The document is designed to serve as a guide for decision making by the Burbank City Council, Planning Commission, other City commissions and committees, and City staff. The Burbank2035 vision establishes priorities for the overall plan, including the following, which are relevant to this section:

Burbank has a desirable balance of land uses to best serve residents and protect the small-town character of the community while maintaining economic vitality.

The City supports businesses that are a vital part of Burbank's economy and seeks to capitalize on unique aspects of its economic base.

Burbank offers a wide range of housing to meet the needs of all age groups, family types, and income levels, as well as those with special housing needs.

2021-2029 Housing Element

The City's Housing Element fulfills the 2021-2029 update cycle for jurisdictions in the SCAG region that covers the planning period from October 15, 2021 through October 15, 2029. The Housing Element ensures that the City establishes policies, procedures and incentives in its land use planning

and development activities that result in the maintenance and expansion of the housing supply to adequately accommodate the City's housing needs. As required by State law, the Housing Element identifies strategies and programs that focus on (1) conserving and improving existing affordable housing; (2) providing adequate housing sites to accommodate future housing needs for all income segments of the community; (3) assisting in the development of affordable housing; (4) removing governmental constraints to housing development; and (5) promoting equal housing opportunities for all Burbank residents (City of Burbank 2022).

For the City's 2021-2029 Housing Element update, Burbank has a RHNA allocation of 8,772 units, as shown in Table 4.12-3. In 2017, the City Council set a goal to construct 12,000 new dwelling units Citywide by the year 2035. The Housing Element provided the foundation for achieving the City's goal of facilitating the development of 12,000 new housing units. However, the estimated growth for the purpose of the EIR analysis for the Housing Element Update was changed to 10,456 housing units to account for the 2029 interpolated housing growth assumed under the Downtown Transit Oriented Development (TOD) Specific Plan and Golden State Specific Plan (GSSP) along with the City's RHNA allocation. With the addition of the 10,456 new units anticipated through the 2021-2029 Housing Element, the City would have 55,525 total residential units, 6,122 lower than Burbank's estimated residential Citywide building cap of 61,647 residential units under Burbank's Land Use Element (City of Burbank 2013).

The Housing Element includes a housing program to amend the General Plan and adopt the Downtown TOD Specific Plan and GSSP to provide the necessary zoning, objective development standards, and processing procedures to facilitate the production of housing required to accommodate the City's RHNA along with the required sites buffer. The Housing Element does not account for the growth under the proposed Project.

Table 4.12-3 Burbank 2021-2029 Regional Housing Needs Assessment

Income Group	Area Media Income (AMI) Percentage	RHNA Allocation (units)	Percent of Total
Very Low	0-30%	2,553	29%
Low	31-50%	1,418	16%
Moderate	51-80%	1,409	16%
Above Moderate	0-80%	3,392	39%
Total		**8,772**	**100%**

Source: City of Burbank 2022

Land Use Element

The Burbank2035 Land Use Element contains goals and policies to balance and appropriately distribute and locate all types of land uses within the City. The Land Use Element's goals and policies that are relevant to population and housing impacts for the proposed Project include:

Goal 1 - Quality of Life: Burbank maintains a high quality of life by carefully balancing the needs of residents, businesses, and visitors.

Policy 1.1: Accommodate a mix of residential and non-residential land uses in appropriate locations that support the diverse needs of Burbank residents, businesses, and visitors. Provide opportunities for living, commerce, employment, recreation, education, culture, entertainment, civic engagement, and socializing.

Goal 5 – Housing: Burbank provides housing options for people and families with diverse needs and resources.

Policy 5.2: Encourage areas of mixed-density and mixed-housing types in commercial corridors to allow people with diverse housing needs to live and interact in the same neighborhood.

Policy 5.3: Provide more diverse housing opportunities, increase home ownership opportunities, and support affordable housing by encouraging alternative and innovative forms of housing.

Policy 5.4: Allow residential units in traditionally non-residential areas, and support adaptive reuse of non-residential buildings for residential and live-work units in Downtown Burbank and other appropriate locations.

Policy 5.5: Provide options for more people to live near work and public transit by allowing higher residential densities in employment centers such as Downtown Burbank and the Media District.

Goal 6 – Economic Vitality and Diversity: Burbank has a healthy and diverse economy and provides for a full range of retail, commercial, office, and industrial uses. Businesses contribute to community character and economic vitality by supporting neighborhood, community, and regional needs and providing diverse employment options

Policy 6.3: Recognize and maintain the Media District as the heart of the media industry in the city. Facilitate continued expansion of the media industry into Downtown, the Golden State area, and other parts of the city.

4.12.3 Environmental Impacts

a. Thresholds of Significance

Thresholds of significance are based on the questions in Appendix G of the *CEQA Guidelines*, which states that impacts related to population and housing would be potentially significant if implementation of the proposed Project would do any of the following:

1. Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure).
2. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Threshold 1 is analyzed below.

b. Effects Found Not to be Significant

Threshold 2 was determined to have a less than significant impact and, therefore, is discussed under Section 4.19, *Effects Found Not to be Significant* and summarized below.

Future development projects under the proposed Project would involve new residential and commercial uses on infill sites, which could potentially result in the displacement of some existing housing units and residents. However, goals, policies, and objectives included in the proposed Project aim to prevent displacement and promote housing stability, and would increase opportunities for housing by rezoning areas for higher density development. Additionally, it is anticipated that any

replacement housing need created by displacement of existing housing would be offset through the implementation of the proposed Project. In addition, there are currently several State housing laws (ex. Density Bonus, Housing Crisis Act of 2019) that regulates the requirements of replacing existing housing units, if applicable, in new housing projects. Therefore, impacts would be less than significant.

c. Methodology

For the baseline conditions, in accordance with *CEQA Guidelines* Section 15125, "a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence" where necessary to provide the most accurate description of the existing conditions. As such, due to the preparation time needed to complete the Draft Specific Plan and Draft EIR, this section utilizes the 2024-2050 RTP/SCS and 2024 population, housing, and employment data from the DOF.

The 2024-2050 RTP/SCS does not provide population forecasts at the city-level, so the analysis does not include analysis of the City's population trends; however, housing and employment trends in the City were evaluated by reviewing the data available from the DOF and SCAG.

Although CEQA requires an EIR to consider its growth-inducing impacts, CEQA provides that the EIR should not assume "that growth in any area is necessarily beneficial, detrimental, or of little significance." Even substantial growth is not a significant impact if it accommodates growth projections for a city that can be accommodated by existing or planned facilities and services, and is consistent with the City's General Plan, as well as State and regional policies and regulations. As such, a significant impact for purposes of this threshold is whether the proposed Project would induce unplanned growth.

d. Project Impacts

Threshold 1:	Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Impact POP-1 DEVELOPMENT UNDER THE PROPOSED PROJECT WOULD EXCEED THE PLANNED GROWTH UNDER THE BURBANK2035 GENERAL PLAN AND SCAG'S 2024-2050 RTP/SCS. HOWEVER, THE PROPOSED PROJECT ENCOURAGES GROWTH IN THE CENTER OF THE SPECIFIC PLAN AREA NEAR EXISTING AND FUTURE TRANSIT OPTIONS AND WOULD PROVIDE GUIDANCE AND STANDARDS TO ENSURE THAT THE ANTICIPATED GROWTH IS ACCOMMODATED. THEREFORE, THE PROPOSED PROJECT WOULD NOT RESULT IN UNPLANNED POPULATION AND HOUSING GROWTH, AND POTENTIAL IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The State requires that all local governments adequately plan to meet the housing needs of their communities. The proposed Project would provide a framework for introducing new housing opportunities, identify sites for residential development with better access to public infrastructure and transportation, encourage high quality contextually compatible development in the Specific Plan Area, and assist the City in accommodating their RHNA allocation. However, Burbank is a largely built-out community with few remaining vacant parcels open for future development. As such, the proposed Project would primarily accommodate new housing units and commercial and general business development on infill sites. Additional projected development of sites (e.g., major office studio sites) are under existing planned developments and development agreements, which would increase development density and to a lesser extent, in the vicinity of the Specific Plan Area.

Table 4.12-4 provides a summary of the City's and County's existing population and housing units and the estimated growth under the proposed Project. At the County level, population and housing growth under the proposed Project is nominal and would not result in a substantial increase and, therefore, is not discussed further. At the City level, population forecasts are not provided by SCAG; as such, the following analysis focuses on the potential impacts associated with growth in housing and employment in the Specific Plan area.

Table 4.12-4 Population and Housing Growth Under the Proposed Project

	City of Burbank	Los Angeles County
Population		
Existing (2024)	105,603	9,824,091
Proposed Project	24,226	24,226
New Total	**129,829**	**9,848,317**
Percent Increase	22.9%	0.25%
Housing		
Existing (2024)	46,457	3,696,408
Proposed Project	9,702	9,702
New Total	**56,159**	**3,706,110**
Percent Increase	20.9%	0.26%

Source: DOF 2024

Housing

As discussed under Section 4.12.2, *Local Regulations,* the anticipated number of housing units under the Burbank 2021-2029 Housing Element is 10,011 units to accommodate the City's forecasted population growth under the Downtown TOD Specific Plan and GSSP, which contain the Housing Element Opportunity Sites. However, the estimated growth under the analysis for the Housing Element EIR was changed to 10,456 units to account for the 2029 interpolated housing growth assumed under the two Specific Plans along with the City's RHNA allocation. The addition of these units results in a total city-wide residential count of 55,525 units. As such, the additional residential units under the proposed Project are not included in the City's current Housing Element. Under the Land Use Element, the established Citywide cap on the number of housing units is 61,647 units. This total of 61,647 units, minus the 55,525 units accounted for under the 2021-2029 Housing Element, results in 6,122 units of growth that is not accounted for in the Housing Element. Therefore, the addition of 9,702 units under the proposed Project would exceed the City's estimated growth under the Housing Element growth.

Table 4.12-2 provides SCAG's housing forecast of 48,600 units in 2035; Table 4.12-4 provides the full buildout of 9,702 housing units under the proposed Project. Based on these projections, the proposed Project would exceed SCAG's 2035 housing forecast by 7,559 units. Therefore, the proposed Project would also result in housing growth in comparison to SCAG's RTP/SCS, which would result in a potentially significant impact associated with population growth.

Although development under the proposed Project would exceed the City's and SCAG's estimated housing growth, the overall vision of the proposed Project (refer to Chapter 5, *Vision and Overarching Goals*) is to address current issues facing the Specific Plan Area, such as housing supply and affordability, transportation infrastructure, and safety, by encouraging contextual transit-oriented

development in the center of the Specific Plan Area around existing and future transit opportunities. In addition, the proposed Project would guide land use and development decisions through the objective design standards and implementation strategies. As such, the overall purpose of the proposed Project is to identify areas for development in the Specific Plan Area and provide the means to accommodate the growth. Therefore, future development under the proposed Project would not result in unplanned population and housing growth.

Employment

Future development under the proposed Project would facilitate up to 3,986,207 square feet of non-residential uses and would include a mix of retail and hospitality uses that would support an estimated 7,801 jobs, as shown in Table 4.12-5. The proposed Project would improve the imbalance of the City's current jobs-to-housing ratio of 3:1 by facilitating the development of more housing units than the estimated number of jobs required to support the mix of retail and hospitality uses under the Specific Plan (City of Burbank 2013).

As shown in Table 4.12-2, the 2024-2050 SCAG RTP/SCS forecasts approximately 144,600 jobs in the City by 2035. The proposed Specific Plan would increase employment from approximately 127,800 to 135,601 jobs (SCAG 2024). This estimated increase in employment opportunities would support the City's goals related to economic growth and providing new opportunities to develop mixed-density and mixed-housing types within City designated commercial corridors. Therefore, the proposed Project would not exceed the projected employment growth forecasted in the 2024-2050 SCAG RTP/SCS.

Table 4.12-5 Estimated Employment Associated with the Proposed Project

Land Use	Build Out Square Footage	Square Feet per Employee[1]	Total New Employees
Retail	3,986,207	511	7,801

[1] Source: SCAG 2001 (Table 4B); the factor used for commercial space is the average of the factors for "Other Retail/Services" and "Low-Rise Office."

Determination

Impacts are less than significant

4.12.4 Cumulative Impacts

Cumulative population and housing impacts consider Citywide growth and development. The City is expected to grow in population and housing through 2035 through implementation of the proposed Project, the Downtown Transit Oriented Growth (TOD Specific Plan (a consolidation and update of the North San Fernando Boulevard Master Plan and the Burbank Center Plan) and the Golden State Specific Plan (GSSP), as described in Section 3, *Environmental Setting*. As described in Section 3, *Environmental Setting,* the Downtown TOD Specific Plan would facilitate development of up to 9,944 residential units and 6,083,657 square feet of commercial and business development land uses; and the GSSP would facilitate development of up to 7,205 residential units and 3,149,623 square feet of commercial and business development land uses. Cumulative impacts may occur if impacts of the proposed Project combine with similar impacts of other projects in the cumulative scenario.

As discussed above under Impact POP-1, housing and employment generation associated with the proposed Project would surpass the SCAG forecast for population and housing growth throughout the SCAG region, but would have a less than significant impact because the overall purpose of the

proposed Project is to identify areas for development in the Specific Plan Area and provide the means to accommodate the growth. Under the cumulative scenario, housing growth under the Downtown TOD Specific Plan, the GSSP, and the proposed Project would increase the City's total housing units by 26,851 housing units from 46,457 units in 2024 to 73,308 units in 2035. As discussed above under Impact POP-1, SCAG forecasted 48,600 units in 2035 and under the Land Use Element, the established Citywide cap on the number of housing units is 61,647 units. Therefore, cumulative housing growth under the Downtown TOD Specific Plan, the GSSP, and the proposed Project would exceed the SCAG and City forecasts and caps for population and housing growth. While the proposed Project and the two aforementioned Specific Plans would support the City's housing and employment goals, the existing infrastructure would not have the capacity to accommodate the demand expected by the population growth associated with the proposed Project along with the Downtown TOD Specific Plan and the GSSP. Therefore, the incremental effect of the proposed Project related to unplanned growth would be cumulatively considerable and cumulative impacts would be significant and unavoidable.

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4.13 Public Services

This section evaluates potential environmental impacts related to public services associated with implementation of the proposed Project. Specifically, this section reviews the proposed Project's impacts to the provision of fire protection services, police protection services, schools, parks, and library facilities.

4.13.1 Environmental Setting

a. Fire Protection

The Burbank Fire Department (BFD) provides fire protection services in Burbank. The BFD consists of seven divisions, including Fire Prevention Bureau, Fire Suppression, Emergency Medical Services, Emergency Management, Fire Apparatus and Equipment, Training and Safety, and Administration. A total of 143 personnel make up the BFD, which has jurisdiction over fires and life-threatening incidents within the City (BFD 2025). The firefighter to resident population ratio Citywide is 1.35 firefighters per 1,000 residents. In 2022, the average response time, from dispatch of the resource to arrival at the scene is approximately 7 minutes and 43 seconds. If the City has a fire emergency for which the BFD does not have sufficient resources, a Statewide system of mutual aid can provide services. These aid requests are processed through the California Governor's Office of Emergency Services (Cal OES); under this system, the City is to rely on its own resources and neighboring jurisdiction's resources before calling for outside assistance. BFD has mutual aid agreements with the Los Angeles County Fire Department (LACFD) and City of Los Angeles Fire Department (LAFD) and has automatic mutual aid through Area C Unified Response with the cities of Alhambra, Arcadia, Glendale, Montebello, Monrovia, Monterey Park, Pasadena, San Gabriel, San Marino, Sierra Madre, South Pasadena, and Vernon, as well as the Burbank-Glendale-Pasadena Airport Authority Fire Department.

BFD reviews site plans, construction plans, and architectural plans prior to occupancy to ensure that required fire protection safety features, including building sprinklers and emergency access, are implemented. Development with modern materials[1] and in accordance with current standards, inclusive of fire-resistant materials, fire alarms and detection systems, automatic fire sprinklers, would enhance fire safety and would support fire protection services (Title 24, California Code of Regulations (CCR). Part 9). The City is divided into six geographical fire districts. Each fire district is served by a fire station and defines the first-due response area for each station. The BFD Headquarters and the six fire stations are described below (BFD 2025).

- **BFD Headquarters.** The BFD Headquarters is located at 311 East Orange Grove Avenue. This building is a combined Police and Fire Headquarters building.
- **Fire Station 11.** Fire Station 11 is located at 311 East Orange Grove Avenue. This station houses an engine and truck company and a rescue ambulance. The BFD's mechanic shop is also located within Fire Station 11. Truck 11 includes a captain, engineer, and two firefighters. Engine 11 includes a captain, engineer, and two firefighters). Rescue Ambulance 11 includes two firefighters/paramedics.

[1] Modern materials refer to materials utilized for development that have significantly improved in terms of performance, functionality, and sustainability.

- **Fire Station 12.** Fire Station 12 is located at 644 North Hollywood Way. This station houses an engine and truck company. Engine 12 includes a captain, engineer, and two firefighters). Truck 12 includes a captain, engineer, and two firefighters). Hazmat 12 includes a captain, engineer, and two firefighters). Hazmat 12 is also staffed by crossover personnel from Truck 12. The Hazardous Materials Division is also located at this station. The crew of Engine 12 switch to Hazardous Materials 12, as needed. This station is first in response to Warner Bros. Studios and the Warner Bros. Ranch, as well as several high-rise office buildings within the Plan Area.
- **Fire Station 13.** Fire Station 13 is located at 2713 Thornton Avenue. This station houses an engine and a rescue ambulance. Engine 13 includes a captain, engineer, and two firefighters). Rescue Ambulance 13 is staffed by two firefighters/paramedics. Fire Station 13 is approximately 3.7 miles from the Plan Area.
- **Fire Station 14.** Fire Station 14 is located at 2305 West Burbank Boulevard. This station is home to a single fire engine. Engine 14 includes a captain, engineer, and firefighter). This station maintains and repairs the self-contained breathing apparatus (SCBA), as well as tests all firefighters in the correct fit of the SCBA masks. Fire Station 14 is approximately 2.5 miles from the Plan Area.
- **Fire Station 15.** Fire Station 15 is located at 1420 West Verdugo Avenue. This station is home to an engine and rescue ambulance. Engine 15 includes a captain, engineer, and firefighter). Rescue ambulances include two staff firefighters/paramedics. This station handles the majority of Emergency Medical Services. Fire Station 15 is approximately 1.8 miles from the Plan Area.
- **Fire Station 16.** Fire Station 16 is located at 1600 North Bel Aire Drive. This station houses an engine and a water tender. Station 16 includes three staff (Captain, Engineer and one Firefighter). Fire Station 16 is approximately 4.8 miles from the Specific Plan area.

b. Police Protection

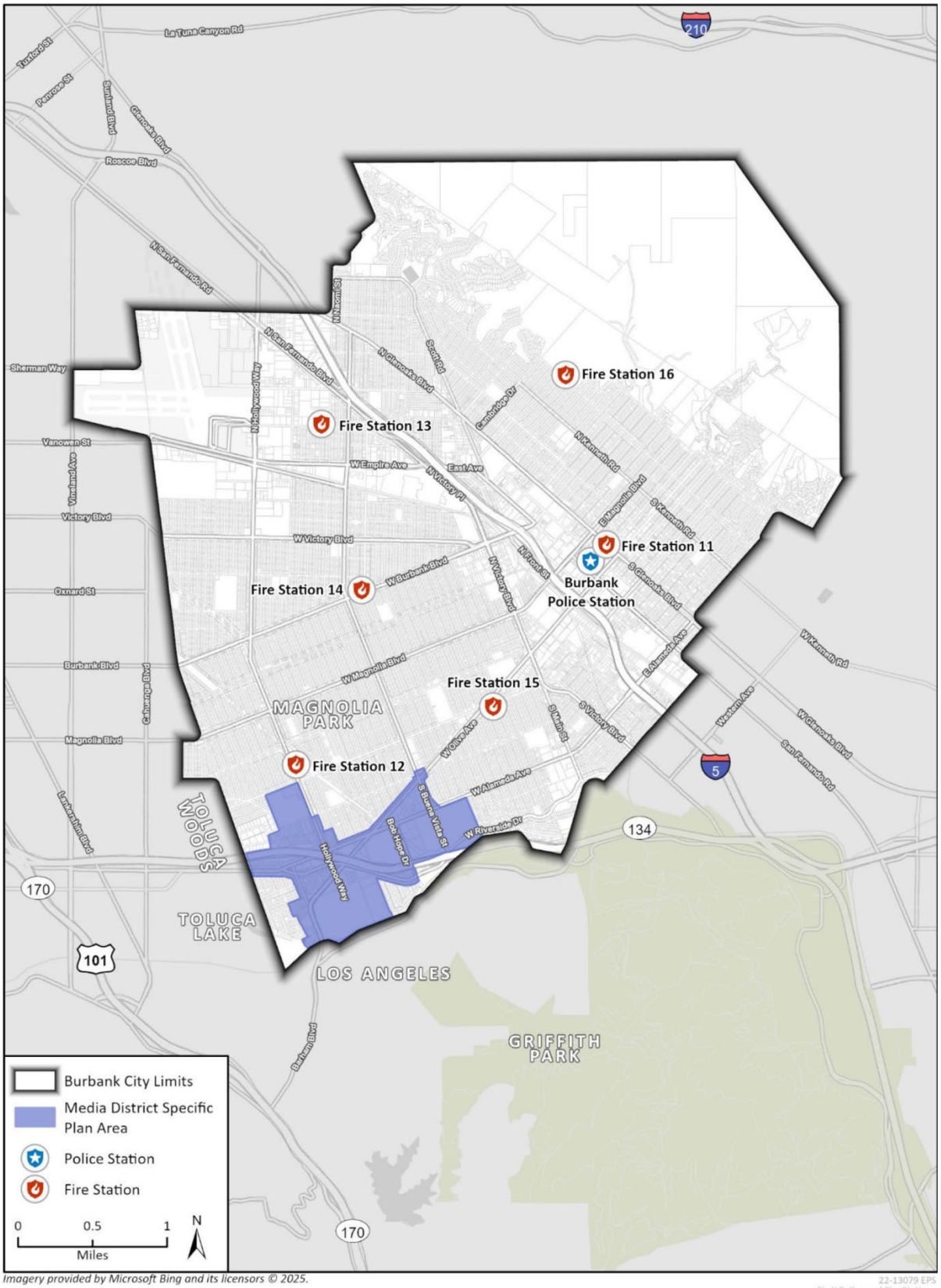
The Burbank Police Department (BPD) provides police protection services within the City limits. BPD currently has 160 sworn officers (BPD 2026). Based on Burbank's population of 105,603 in 2024, the BPD employs approximately 1.52 officers per 1,000 residents. The BPD is made up of the following five divisions: patrol, investigations, administrative services, support services, and budget and finance.

The BPD operates four facilities: a Police Headquarters, a police pistol range, the City jail, and a heliport located at the Burbank Airport. Similar to the BFD, the BPD maintains mutual aid relationships with police departments for the cities of Los Angeles, San Fernando, Glendale, and Pasadena. As part of the State Emergency Aid System, the BPD also provides officers and equipment to other jurisdictions in the event of an emergency. The Los Angeles County Sheriff's Department can also provide aid, if needed, as part of mutual aid through CalOES.

The BPD serves the Specific Plan Area and is located at 200 N 3rd Street. The travel distance and most direct route is approximately 3.1 miles to the northeastern portion of the Specific Plan Area.

Figure 4.13-1 shows the BFD stations and BPD station in relation to the Specific Plan Area.

Figure 4.13-1 Police and Fire Stations



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Additional data provided by City of Burbank, 2025.

22-13079 EPS
Fig X Police and Fire Stations

c. Schools

The Burbank Unified School District (BUSD) provides public school services to Burbank residents for grades kindergarten through 12 (K-12). BUSD oversees 11 elementary schools, three middle schools, three high schools, and three alternative schools that offer child development, special education, independent learning, and adult education programs. Schools within BUSD have a combined student capacity of 16,028 (California Department of Education 2023a). Table 4.13-1 shows the enrollment Specific Plan Area.

Table 4.13-1 BUSD Student Enrollment and Capacity

School Name	Current Enrollment	Enrollment Capacity	Remaining Capacity
Elementary Schools			
Bret Harte	537	600	63
George Washington	431	496	64
Joaquin Miller	748	760	12
Providencia	403	440	37
R. L. Stevenson	529	632	103
Ralph Emerson	540	632	92
Theodore Roosevelt	585	600	15
Thomas Edison	461	600	139
Thomas Jefferson	749	736	-13
Walt Disney	422	444	22
William McKinley	440	468	28
Total	**5,825**	**6,408**	**357**
Middle Schools			
Dolores Huerta	910	1,250	340
John Muir	1,362	1,500	138
Luther Burbank	967	1,200	233
Total	**3,239**	**3,950**	**568**
High Schools			
Burbank	2,471	2,700	229
John Burroughs	2,358	2,700	342
Monterey High School	93	270	177
Total	**4,922**	**5,670**	**625**
Additional Schools in District			
Community Day School	26	50	24
Magnolia Park School	28	50	22
Burbank Unified Independent Learning Academy (BUILA)	168	NA	NA
Total	**222**	**100**	**55**
Grand Total	**14,208**	**16,028**	**1,550**

California Department of Education 2023; Kukta 2021

NA – Not Available

d. Parks

Burbank contains nearly 2,700 acres of designated open space, including approximately 732 acres of improved parkland. Wildwood Canyon Park and Stough Canyon Park are the two largest parks in the City, occupying 500 acres and approximately 100 acres, respectively. These regional parks are located in the Verdugo Mountains and are less developed than other parks in the City, particularly those located in the flat developed portions of Burbank. The remaining open space is located primarily in the Verdugo Mountains. This acreage connects to approximately 60,000 acres of additional open space managed by the Santa Monica Mountains Conservancy. Twenty-six parks are located within Burbank, ranging in size from pocket parks less than 0.25 acre to a 500-acre regional park. Based on the existing population of 105,603 in 2024, there are approximately seven acres of parkland for every 1,000 Burbank residents. The Specific Plan Area contains Johnny Carson Park. Additionally, the Plan Area falls within the 0.5-mile service areas for Whitnall Highway Park South, Verdugo Park, Mountain View Park, and Abraham Lincoln Park.

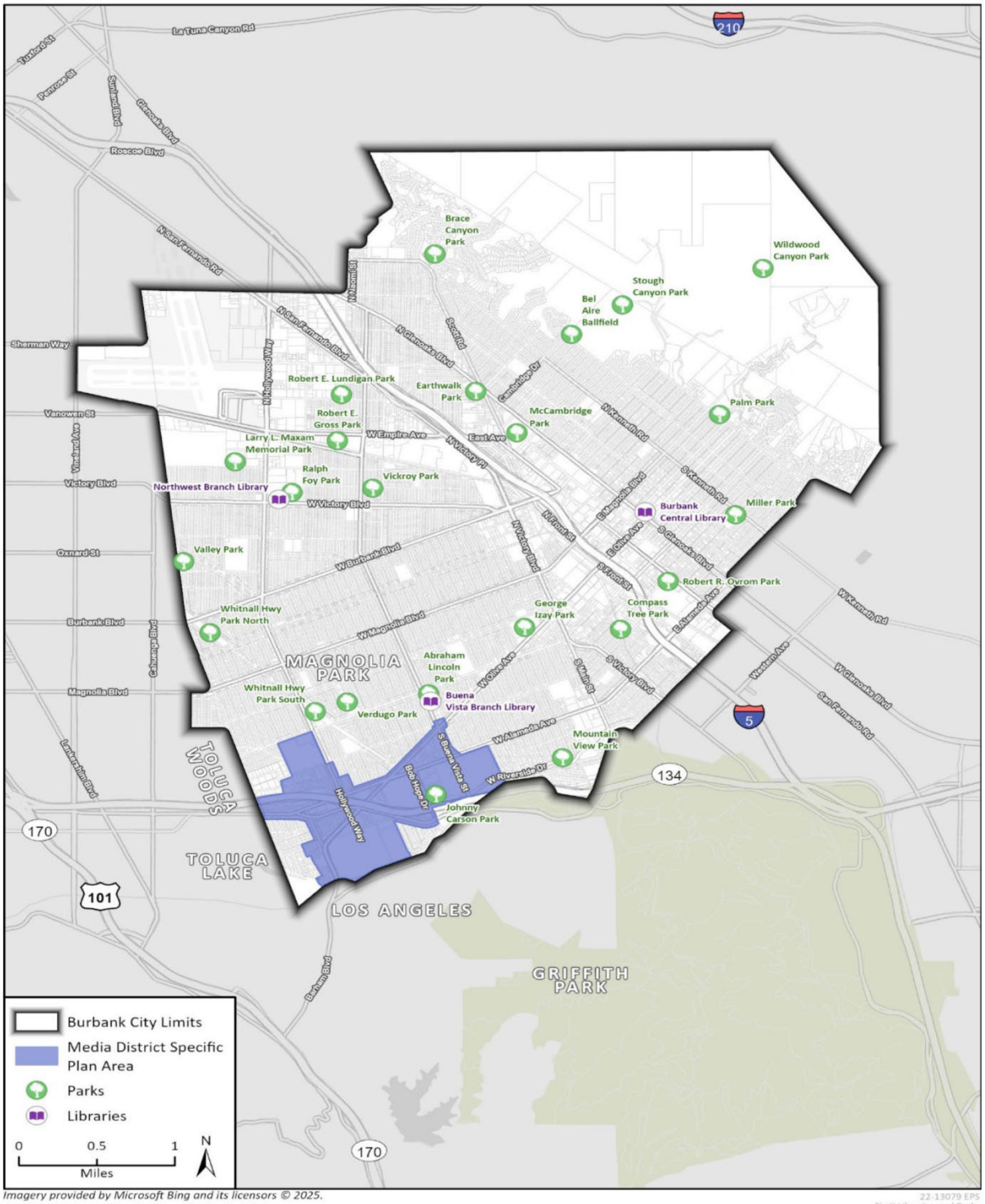
e. Libraries

The Burbank Public Library was founded in 1913 and has three locations: Central Branch, Buena Vista Branch, and Northwest Branch. These three branches are collectively open 155.5 hours per week. During the 2023-2024 fiscal year, the Burbank Public Library received 494,526 visits to the branches and had 18,290 attendees in 561 programs (California State Library 2024). Compared to other libraries in similar communities to Burbank within the region (Glendale, Pasadena, Santa Monica, Thousand Oaks, Torrance), Burbank is low on space (ranks 5 of 6 at 0.74 square feet per capita, with only Torrance being lower) and is moderately well-staffed (ranks 3 of 6 at 0.60 full time equivalent staff per 1,000 population, slightly ahead of Thousand Oaks and Torrance).

The nearest library to the Specific Plan Area is the Buena Vista Branch, approximately 0.25 mile from the northeastern portion of the Plan Area. The libraries within the City of Burbank lend materials in a variety of formats, including eBooks, and offers programs for all ages on subjects ranging from arts and literature to science, technology, and current events. Flagship programs offered include a volunteer-based tutoring program for adults, who read below an 8th grade level; the Spark Digital Media Lab; and the Burbank in Focus collection of digitized historical photos. The libraries are also supported by a volunteer corps and Friends of the Library group and coordinate the Sister City program on behalf of the City of Burbank.

Figure 4.13-2 shows the libraries and parks in relation to the Specific Plan Area.

Figure 4.13-2 Libraries and Parks



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Additional data provided by City of Burbank, 2025.

22-13079 EPS
Fig X Libraries and Parks

4.13.2 Regulatory Setting

a. Federal Regulations

Occupational Safety and Health Administration

The Federal Occupational Safety and Health Administrations (OSHA), as well as California OSHA (Cal/OSHA) enforce the provisions of the Federal and State Occupational Safety and Health Acts, respectively, which collectively require safety and health regulations for construction under Part 1926 of Title 29 Code of Federal Regulations (CFR). The fire-related requirements of the Federal Occupational Safety and Health Act are specifically contained in Subpart F, Fire Protection and Prevention, of 29 CFR Part 1926. Examples of general requirements related to fire protection and prevention include maintaining fire suppression equipment specific to construction on-site; providing a temporary or permanent water supply of sufficient volume, duration, and pressure; properly operating the on-site fire-fighting equipment; and keeping storage sites free from accumulation of unnecessary combustible materials.

b. State Regulations

Fire Protection Services

California Occupational Safety and Health Administration

In accordance with California Code of Regulations (CCR) Title 8 Section 1920, Fire Prevention, and Section 6773, Fire Protection and Fire Fighting Equipment, Cal/OSHA has established minimum standards for fire suppression and emergency medical services. The standards include, but are not limited to, guidelines on the handling of highly combustible materials, fire hose sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all fire-fighting and emergency medical equipment.

California Strategic Fire Plan (Fire Plan)

The Fire Plan is a cooperative effort between the State Board of Forestry and Fire Protection and the California Department of Forestry and Fire Protection (CAL FIRE). By placing the emphasis on what needs to be done before a fire starts, the Fire Plan looks to reduce firefighting costs and property losses, increase firefighter safety, and to contribute to overall ecosystem health. The central goals that are critical to reducing and preventing the impacts of fire revolve around both suppression efforts and fire prevention efforts.

At the time of circulation of the Notice of Preparation (NOP) for this EIR, the 2018 Fire Plan was in effect. The 2018 Fire Plan addresses:

- Wildland fire hazards and recognition of life, property, and natural resource assets at risk
- Land use planning as it relates to protection of life, property, and natural resources from risks associated with wildland fire
- Shared vision among communities and the multiple fire protection jurisdictions, including local, county, and regional plans that address fire protection and landowner objectives
- Fire prevention awareness, knowledge, and actions implemented by individuals and communities to reduce human loss, property damage, and impacts to natural resources from wildland fires

- Integration of fire and fuels management practices with landowner/land manager priorities across jurisdictions
- Levels of fire suppression and related services
- Post-fire recovery and programs for the protection of life, property, and natural resource recovery

The Fire Plan has been updated since the NOP was circulated, so the 2024 Fire Plan in now in effect. The 2024 Fire Plan is based on identification and prioritization of diverse operational and programmatic concerns confirmed through internal and external engagements that included a department-wide employee survey, an external survey, multiple in-person and virtual meetings, and working groups. Through this engagement process, the 2024 Fire Plan identifies the following six goals:

- **Goal 1:** Attract, hire, and retain quality employees.
- **Goal 2:** Ensure all employees understand how the Department's various programs and job duties contribute towards efficiency achieving the CAL FIRE mission.
- **Goal 3:** Promote a culture that values equitable access, embraces diverse background and experiences, and actively removes barriers to cultivate a more inclusive environment.
- **Goal 4:** Leverage technology to modernize internal human resources processes and create efficient and effective innovative solutions to promote, support, and enhance the employee experience.
- **Goal 5:** Strengthen the Department's physical and digital infrastructure and streamline equitable access to information across core services.
- **Goal 6:** Identify core capabilities and strengthen operational capacity.

California Fire Code (CCR Title 24, Part 9)

The California Fire Code incorporates the Uniform Fire Code (UFC) with necessary California amendments. This code prescribes regulations consistent with nationally recognized good practices for the safeguarding, to a reasonable degree, of life and property from the hazards of fire explosion. It also addresses dangerous conditions arising from the storage, handling, and use of hazardous materials and devices; conditions hazardous to life or property in the use or occupancy of buildings or premises; and provisions to assist emergency response personnel.

California Health and Safety Code (Sections 13000 et seq.)

This California Health and Safety Code establishes State fire regulations, including regulations for building standards (also set forth in the California Building Code), fire protection and notification systems, fire protection devices, such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

Police and Fire Protection Services

California Constitution Article XIII, Section 35

Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172, which directed the proceeds of a 0.50-percent sales tax to be expended exclusively for local public safety services. Section 35(a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." California Government Code Sections 30051-30056 provide rules

to implement Proposition 172. Public safety services include police protection. Section 30056 provides that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on police protection, as well as other public safety services.

School Services

School Facility Fees

California Education Code Section 17620 authorizes school districts to levy a fee, charge, dedication, or other requirement against any development project for the construction or reconstruction of school facilities, provided that the district can show justification for levying of fees.

California Government Code Section 65995 was established under the School Facilities Act of 1986 and refined and amended by SB 50 (1998) which also added the Leroy F. Greene School Facilities Act of 1998 to provide further guidance and restrictions on fee limits and fee types. The payment of school impact fees by developers are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other State or local laws. BUSD determines fees annually in accordance with California Government Code Section 65995.

SB 50 also established a program for funding school facilities largely based on matching funds. For new school construction, grants provide funding on a 50/50 State and local match basis. For school modernization, grants provide funding on a 60/40 State and local match basis. Districts that are unable to provide some, or all, of the local match requirement and are able to meet the financial hardship provisions may be eligible for additional State funding.

Comprehensive School Safety Plan

California Government Code Section 32280 *et seq.* requires that all public schools that offer K-12 that are operated by school districts develop a comprehensive school safety plan that addresses the safety concerns identified through a systematic planning process. The schools must work in cooperation with local law enforcement agencies, community leaders, parents, pupils, teachers, administrators, classified employees, local emergency medical services personnel, and other persons who may be interested in the health and safety of pupils and the prevention of campus crime and violence (California Education Code Section 32280).

California Education Code

Educational services and school facilities are subject to the rules and regulations of the California Education Code, the California Department of Education (CDE), and governance of the State Board of Education (SBE) (California Education Code Section 33000, et seq.). The CDE is the government agency responsible for public education throughout the State. With the State Superintendent of Public Instruction, the CDE is responsible for enforcing education laws and regulations and for continuing to reform and improve public elementary school, secondary school[2], childcare programs, adult education, and preschool programs. The CDE oversees funding and student testing and achievement levels for all State schools. A sector of the CDE, the SBE is the 11-member governing and policymaking body of the CDE that sets K–12 education policy in the areas of standards, instructional materials, assessment, and accountability. The State also provides funding through a combination of sales and

[2] Secondary school refers to middle and high school.

income taxes. In addition, pursuant to Proposition 98, the State is also responsible for the allocation of educational funds that are acquired from property taxes.

c. Local Regulations

Burbank Municipal Code

The City of Burbank requires the payment of development impact fees (DIFs) to offset the impacts of new developments on City facilities. As stated in Burbank Municipal Code (BMC) Title 10 (Zoning Regulations) Article 22 (Community Facility Fees), DIFs are collected for the purpose of financing capital improvements within the following categories: transportation improvement fees, library fees, park and recreation fees (except fees charged in lieu of park land dedication pursuant to Government Code Section 66477), police fees, fire fees, and information technology fees. Per BMC Section 10-1-2204, Definitions, DIFs are collected for the purpose of defraying all or a portion of the cost of certain capital improvements related to a development project. Per BMC Section 10-1-2208, Development Fee Accounts and Audits, DIFs shall be used exclusively for the capital improvements for which the development fees were collected. These fees do not usurp Park and Recreation fees charged in lieu of park land dedication pursuant to Government Code Section 66477, Quimby Act. The current rates for DIFs are specified within Article VIII, Electrical and Building Permits, Section 3, Development Impact Fees, of the City's Adopted Citywide Fee Schedule. Fees are determined at a rate per square foot or per dwelling unit depending on the nature of the project; the square footage of the development or the dwelling unit count determines the total fee to be paid. A portion of development fees collected by the City are distributed to public facilities, including fire protection facilities, library facilities, parks and recreation facilities, and police protection facilities.

BMC Title 9, Chapter 4, Article 1, Sections 9-4-1-1103 and 9-4-1-1104 define the City's requirement of a parks facility development fee for each new single family or multi-family dwelling unit. Sections 9-4-1-1103 and 9-4-1-1104 define how the park facility fees shall be imposed, collected, and used.

Chapter 1 of BMC Title 9 (Building Regulations) establishes minimum standards to safeguard public health and safety in future development. This chapter of the BMC points to the California Fire Code as a reference. It outlines how new development should be structurally prepared for fires and other natural disasters, ensures emergency services can operate effectively during emergencies, and sets requirements for ventilation, electricity, and sanitation.

Fire system plan checks are required and performed by the BFD Fire Prevention Bureau for all commercial and residential occupancies. Plan checks of fire systems include automatic fire sprinkler systems, fire alarm systems, and architectural plan reviews. Fire system plans must be submitted by a contractor who has paid the Contractor's City Business Tax.

The BFD Fire Prevention Bureau is also responsible for conducting life safety inspections of new building construction, building tenant improvements or re-models, fire sprinkler systems, fire alarm systems and special protection systems for compliance with the California Fire Code as amended by the BMC. The fee for these inspections must be paid by the project applicant.

City of Burbank Local Hazard Mitigation Plan (2023)

The local hazard mitigation plan (LHMP) addresses natural hazards, such as wind storms, localized stormwater drainage floods, earthquakes, fires, landslides, and major floods. Adoption of the LHMP increases the City's opportunity to apply for grants funded by the Federal Emergency Management Agency (FEMA) that support projects that mitigate future risks, such as upgrading outdated

infrastructure to be resilient to fire or flooding, or improving emergency response systems to ensure adequate response times from emergency services.

Burbank2035 General Plan

The Burbank2035 General Plan Safety Element's main objective is to introduce safety considerations into the planning process to reduce the potential loss for life, injuries, damage to property, or economic and social dislocation resulting from fire, geologic hazard, or seismic hazards. The Safety Element's discussion of fire services is in regard to planning for effective confrontation of wildland and urban fires (City of Burbank 2013).

The following are the specific policies relating to fire protection, police protection, and crime prevention within the General Plan's Safety Element.

Goal 4 Fire Protection: Burbank provides high-quality fire protection services to residents and visitors. Threats to public safety are reduced and property is protected from wildland and urban fire hazards.

- **Policy 4.1:** Maintain a maximum response time of 5 minutes for fire suppression services. Require new development to ensure that fire response times and service standards are maintained.
- **Policy 4.2:** Provide adequate staffing, equipment, technology, and funding for the Burbank Fire Department to meet existing and projected service demands and response times.
- **Policy 4.3:** Implement fire prevention and suppression programs in the Very High Fire Severity Zone.
- **Policy 4.4:** Maintain adequate fire breaks in areas within and adjacent to areas of high wildfire risk.
- **Policy 4.5:** Coordinate firefighting efforts with local, state, and federal agencies.
- **Policy 4.6:** Increase the resilience of existing development in high-hazard areas built prior to modern fire safety codes or wildfire hazard mitigation guidance.
- **Policy 4.7:** Maintain adequate fire suppression capability in areas of intensifying urban development, as well as areas where urban uses and open spaces mix.

Goal 2 Police Protection: Burbank provides high-quality police protection services to residents and visitors.

- **Policy 2.1:** Maintain an average police response time of less than 4 minutes to emergency calls for service.
- **Policy 2.2:** Ensure adequate staffing, facilities, equipment, technology, and funding for the Burbank Police Department to meet existing and projected service demands and response times.
- **Policy 2.3:** Provide and use up-to-date technology to improve crime prevention.
- **Policy 2.4:** Develop and support crime prevention programs throughout the city, including the Crime Prevention Through Environmental Design (CPTED) and Neighborhood Watch programs.
- **Policy 2.5:** Provide public education from neighborhood safety programs to encourage active participation by Burbank residents and businesses.

Goal 3 Crime Prevention: Burbank is protected from the threat of civil disturbances and terrorism and is prepared to achieve and maintain a safe and secure environment to reduce the number of lives lost, injuries, and amount of property damage.

- **Policy 3.1:** Adapt to changing safety needs of the community.
- **Policy 3.2:** Reduce opportunities for criminal activity through physical design standards such as CPTED and youth programs, recreation opportunities, education programs, and counseling services.

The Open Space and Conservation Element addresses the preservation of renewable and non-renewable natural resources; managed production of resources, such as energy and groundwater supply; and trail-oriented recreation use. As the City's population grows, the Open Space and Conservation Element also aims to ensure that all current and future residents have access to nature, clean and safe parks, and diverse recreational opportunities.

The Burbank2035 General Plan states the following goals and policies within its Open Space and Conservation Plan related to parks and open space.

Goal 2 Parks, Open Space, and Recreational Facilities: Parks, open space, and recreational facilities contribute to the high quality of life enjoyed by Burbank residents and the economic value of the community.

- **Policy 2.1:** Identify areas of the city that are currently underserved and focus park expansion and open space acquisition in these areas.
- **Policy 2.2:** Provide a community or neighborhood park within 1/2 mile of all Burbank residences.
- **Policy 2.3:** Provide park and recreation facilities at a minimum level of 3 acres per 1,000 persons, with the goal of 5 acres per 1,000 persons.
- **Policy 2.4:** Seek opportunities to develop additional parks and open space in areas where needed, including pocket parks, dog parks, athletic fields, amphitheaters, gardens, and shared facilities.

Goal 3 Parks and Recreation Facilities Maintenance: Parks and recreation facilities are improved and maintained to ensure they meet the needs of the community.

- **Policy 3.1:** Improve and rehabilitate existing parks and recreation facilities.
- **Policy 3.7:** Ensure that the public transit system connects parks and recreation facilities to the rest of the community.

Goal 4 Recreation Programs: Burbank provides a variety of recreation opportunities that meet the needs of all members of the community.

- **Policy 4.2:** Enhance and expand existing recreation programs in response to changing community demographics and needs.

The Land Use Element serves as a guide to create balance in the community that will manage future growth, strengthen and diversify the economy, and protect Burbank's neighborhoods and quality of life. It includes a land use map, programs, and policies that guide where homes, businesses, parks, roads, and other uses should go to support safe, organized, and sustainable growth.

The Burbank2035 General Plan states the following goals and policies within the Land Use Element related to public facilities such as libraries.

Goal 13 Institutional Land Use: Burbank's institutional uses provide valuable community services and comprise the framework around which the community is built.

Policy 13.1: Ensure that public facilities meet the needs of the community and effectively and equitably provide service.

Policy 13.2: Ensure that public facilities maintain compatibility with surrounding land uses and minimize negative effects on neighboring uses.

Policy 13.4: Retain public facility sites for public use and do not redevelop them as non-public uses. Convert public facilities that are no longer needed for their original purpose to public open space or another public-serving use.

4.13.3 Environmental Impacts

a. Thresholds of Significance

According to *CEQA Guidelines* Appendix G, impacts related to public services would be potentially significant if implementation of the proposed Project would:

1. Result in substantial adverse physical impacts associated with the need for or provision of new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for:
    a. Fire protection
    b. Police protection
    c. Schools
    d. Parks
    e. Other public facilities (such as libraries)

Thresholds 1a through 1e are analyzed below.

b. Methodology

For the baseline conditions, in accordance with CEQA Guidelines Section 15125, "a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence" where necessary to provide the most accurate description of the existing conditions. As such, due to the preparation time needed to complete the Draft Specific Plan and Draft EIR, this section utilizes 2024 population data from the DOF.

This analysis considers the *CEQA Guidelines* Appendix G thresholds, as described above, in determining whether the proposed Project would result in impacts related to the provision of public services. The evaluation was based on reviewing the regulations detailed in Section 4.13.2, *Regulatory Setting*, and determining their applicability to the proposed Project. Public services information was acquired through review of relevant documents, questionnaires sent to the BUSD and other service providers, and consultation with City staff, BFD, BPD, BUSD, the Parks and Recreation Department, and Burbank Public Library. The determination that the proposed Project would or would not result

in "substantial" adverse effects concerning public services considers the relevant policies and regulations established by local and regional agencies, the proposed Project's compliance with such policies, and whether the Project would create the need for new or expanded facilities, the construction of which could result in environmental impacts.

c. Project Impacts

Threshold 1a:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, or the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Impact PS-1 FUTURE DEVELOPMENT PROJECTS UNDER THE PROPOSED PROJECT WOULD RESULT IN AN INCREASE IN POPULATION IN THE CITY, WHICH WOULD INCREASE DEMAND FOR FIRE PROTECTION SERVICES, RESULTING IN THE NEED FOR ADDITIONAL AND/OR EXPANDED FIRE PROTECTION FACILITIES. DEVELOPMENT IMPACT FEES WOULD OFFSET THE IMPACTS RELATED TO CONSTRUCTION OF NEW FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE NEED FOR WHICH WOULD BE DUE TO CUMULATIVE GROWTH IN THE AREA. THE LOCATIONS OF FUTURE NEW OR EXPANDED FACILITIES ARE NOT KNOWN AT THIS POINT IN TIME, AND ENVIRONMENTAL IMPACTS WOULD BE SPECULATIVE. HOWEVER, COMPLIANCE WITH APPLICABLE CODES AND REGULATIONS AND COMPLIANCE WITH GENERAL PLAN GOALS AND POLICIES WOULD DIRECT THE CITY TO CONTINUE REVIEWING FIRE PROTECTION NEEDS AND ADEQUATELY PROVIDE SERVICES FOR THOSE NEEDS ON A PROJECT-LEVEL BASIS, WHICH WOULD REDUCE POTENTIAL IMPACTS RELATED TO FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES TO A LESS-THAN-SIGNIFICANT IMPACT.

Housing development associated with the proposed Project would add an estimated 24,226 residents to the City; based on the average household size in Burbank of 2.38, increasing Burbank's population from 105,603 (California Department of Finance [DOF] 2024) to 129,829 during the proposed Project's planning implementation period (see Section 4.8, *Population/Housing)*. This population increase, along with the non-residential development under the proposed Project, would incrementally increase demand for fire protection services.

Development carried out under the proposed Project would be required to comply with all applicable fire code and ordinances requirements for construction, emergency/fire, access, water mains, fire flows, and hydrants, and would be subject to review and approval by the BFD prior to building permit and certificate of occupancy issuance. Development with modern materials and in accordance with current standards, inclusive of fire-resistant materials, fire alarms and detection systems, automatic fire sprinklers, would enhance fire safety and support fire protection services. Refer to Section 4.18, *Wildfire*, regarding the potential impacts related to wildfire and the regulations that would apply to new development.

Increased development, density, population, and traffic resulting from implementation of the proposed Project would increase calls for service throughout the City for issues, including, but not limited to, emergency medical service, structure fires, and traffic collisions. The direct effect on the BFD would include evaluation of staffing and resource deployment to accommodate the increase in call volume throughout the City and all six fire stations. The increase in calls for service directly affects the use, lifespan, and deterioration of infrastructure, facilities, and equipment. Additionally, development would increase the BFD's staffing need to fulfill their obligations for fire prevention and safety, which would include reviewing development plans to verify that projects comply with all applicable fire codes (City of Burbank 2022; BFD 2021).

General Plan Policies 4.1 through 4.7 are intended to reduce fire risk in the City by allocating resources to meet projected demands and response times, maintaining adequate fire resources in areas vulnerable to fires in VHFHSZ and dense urban areas, and coordinating firefighting efforts with other local, State, and federal agencies. The BFD receives its funding through property taxes, DIFs, fees for service, and grant funding and can fund expanded services as new development occurs. Development projects under the proposed Project would be reviewed by the Burbank Fire Department to determine if there are any impacts to their operations including any life and safety requirements specific to the development, any upgrades to existing fire facilities, and impacts to response time. Development projects may be required to pay fire DIFs to fund additional facilities and equipment. These funds, in addition to the General Fund from property and sales tax revenues, would help pay for costs associated with the development of new fire stations, if needed, including any required project-level environmental analysis. As a result of new housing and population growth consistent with the proposed Project, the City will consider long term capital facility needs and associated staffing needs to maintain optimal rates of emergency service personnel per capita to ensure continuity of service at levels that protect the public health, safety, and general welfare consistent with California Constitution Article XIII Section 35 subdivision (a)(2).

It is anticipated that if it becomes necessary in the future to build a new fire station or expand an existing station due to development associated with the proposed Project, any construction would be subject to CEQA review at the time a site is identified and a specific design proposed. Given the city's highly developed nature and the likelihood that a station would be on an infill site, potential impacts under that infrastructure project would likely be less than significant or even exempt from CEQA review. Therefore, impacts related to the provision of fire services resulting from implementation of the proposed Project would be less than significant.

Determination

Less than significant impact

Threshold 1b:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives?

Impact PS-2 FUTURE DEVELOPMENT PROJECTS UNDER THE PROPOSED PROJECT WOULD RESULT IN AN INCREASE IN POPULATION IN THE CITY, WHICH WOULD INCREASE DEMAND FOR POLICE PROTECTION SERVICES, RESULTING IN THE NEED FOR ADDITIONAL STAFF AND EQUIPMENT. HOWEVER, CONFORMANCE WITH GENERAL PLAN POLICIES AND PROGRAMS RELATED TO POLICE PROTECTION WOULD REQUIRE THE CITY TO CONTINUE TO PROVIDE FUNDING AND ADEQUATE STAFFING, FACILITIES, EQUIPMENT, AND TECHNOLOGY TO MEET EXISTING AND PROJECTED SERVICE DEMANDS AND RESPONSE TIMES. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Housing development associated with the proposed Project would add an estimated 24,226 residents to the City; based on the average household size in Burbank of 2.37, increasing Burbank's population from 105,603 (DOF 2024b) to 129,829 during the proposed Project's planning implementation period. Based on BPD's current staffing level of 160 sworn officers, the BPD's officer/resident ratio would drop from approximately 1.52 to approximately 1.23 sworn officers per 1,000 residents.

Policies 2.1 and 2.2 in the Burbank2035 General Plan Safety Element require the BPD to ensure that there is adequate staffing, facilities, equipment, technology, and funding to meet existing services demands and maintain an average response time of four minutes to emergency calls for service. Additional demand for police service would be accommodated through the expansion of police personnel and facilities to continue to meet the BPD's service standards. Based on personal communication with BPD, to maintain the current staffing proportions for the anticipated population growth associated with the proposed Project, approximately 33 officers and 18 civilian positions would be required, in addition to vehicles, equipment, and facilities (Cornils 2025). Police protection service levels would continue to be evaluated and maintained by BPD in accordance with existing policies, procedures, and practices as development occurs over the lifetime of the proposed Project. Additionally, future development projects under the proposed Project would be required to pay police DIFs to help fund additional facilities and equipment. These funds, in addition to the General Fund from property and sales tax revenues, would help pay for costs associated with the development of new police stations, if needed, including any required environmental analysis.

Planning for new or physically altered BPD stations is based on an assessment of the cumulative need for new facilities. To support population growth associated with the proposed Project, the proposed Project may require new or expanded facilities; however, the incremental contribution to demand for increased BPD protection services would be offset by payment of proportionate property taxes and sales taxes and DIFs to the City of Burbank by developers and the addition of new residents. Conformance with the Burbank2035 Safety Element policies related to police protection would require the City to continue providing funding and adequate staffing to meet existing and projected service times. Future physical changes made to the environment due to future infrastructure projects would be required to undergo separate project-level CEQA analysis to identify and address impacts. Therefore, potential impacts associated with the need for new or physically altered police protection facilities resulting from implementation of the proposed Project would be less than significant.

Determination

Less than significant impact

Threshold 1c:	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered schools, or the need for new or physically altered schools, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Impact PS-3 FUTURE DEVELOPMENT PROJECTS UNDER THE PROPOSED PROJECT WOULD RESULT IN AN INCREASE IN POPULATION IN THE SPECIFIC PLAN AREA, RESULTING IN THE NEED FOR NEW OR EXPANDED SCHOOL FACILITIES. HOWEVER, CALIFORNIA EDUCATION CODE 17620 WOULD REQUIRE FUNDING FOR THE PROVISION OF NEW OR EXPANSION OF EXISTING SCHOOL FACILITIES TO OFFSET IMPACTS FROM NEW DEVELOPMENT. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

Future development projects under the proposed Project would not directly result in development of local schools but would generate new students entering the BUSD. Implementation of the proposed Project would add an estimated 24,226 residents and some of those residents would be school-aged children. Based on student generation rates for the BUSD, the proposed Project could generate an estimated 2,182 students, which may result in the following distribution between grades K-12: 898 elementary school students (grades K-5); 524 middle school students (grade 6-8); and 760 high school

students (grades 9-12).[3] The schools that would serve the Specific Plan Area are Robert Louis Stevenson Elementary School, Dolores Huerta Middle School, and Burroughs High School. As shown in Table 4.13-1, remaining enrollment capacity in the BUSD as of school years 2022 and 2023 would not adequately accommodate the 2,182 additional students assumed as part of the proposed Project. However, to offset a project's potential impact to schools as discussed in Regulatory Setting, California Education Code 17620 establishes the base amount of allowable developer fees a school district can collect from development projects located within its boundaries. The fees obtained by BUSD are used to maintain the desired school capacity and the maintenance and/or development of new school facilities. Development facilitated by the proposed Project and associated rezonings would be subject to these State-mandated school impact fees and collected at the time of building permit issuance. Pursuant to Section 65995(h) of the California Government Code, the payment of statutory fees is "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization as defined in Section 56021 or 56073, on the provision of adequate school facilities."

Additionally, based on information provided by BUSD in 2020, BUSD utilizes inter-district permits to keep overall enrollment and average daily attendance numbers at levels sufficient to maintain the level of funding necessary for ongoing operations of schools, including staffing, supplies, and programming (BUSD 2020). Between 2020 and 2023, BUSD's resident-based enrollment decreased by approximately two percent (a decrease of 272 students); during the same period, there was an increase in the number of inter-district permits that BUSD issued to address the decrease and sustain necessary average daily attendance (California Department of Education 2023b). BUSD will continue to evaluate demand, capacity, and plans for facility needs as future development projects under the proposed Project are built out, including any required decreases to the number of inter-district permits relative to new student population generated from additional housing development in the City.

There are no planned improvements to add capacity through expansion. To accommodate additional students from new housing development(s), BUSD would place students at other BUSD schools in the event their home school enrollment was at capacity (Kukta 2021). It is important to note that student daily attendance has a direct effect on State funds in the form of "average daily attendance numbers." The average daily attendance for individual schools and the district as a whole can affect the availability of State money received to help fund daily operations that include school staffing needs. In the event that BUSD constructs a new school or physically alters an existing facility, a project-specific environmental analysis would be required under CEQA to address site-specific environmental concerns. As described above, existing laws and regulations would require funding for the provision or expansion of new school facilities to offset impacts from new residential development, and impacts would be less than significant.

Determination

Less than significant impact

[3] Generation rates based on the 2022 Burbank Unified School District (BUSD) School Fee Justification Study. Generation rates for multi-family residential units include: 0.095 for elementary school students (grades K-5), 0.0540 for middle school students (grades 6-8), and 0.0784 for high school students (grades 9-12).

Threshold 1d: Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Impact PS-4 FUTURE DEVELOPMENT PROJECTS ACCOMMODATED UNDER THE PROPOSED PROJECT WOULD RESULT IN AN INCREASE IN POPULATION IN THE CITY, WHICH WOULD INCREASE DEMAND FOR PARKS AND RECREATION SERVICES. HOWEVER, THE PROPOSED PROJECTS WOULD NOT DIRECTLY INTRODUCE OR EXPAND EXISTING PARKS, AND CONFORMANCE WITH GENERAL PLAN POLICIES AND PROGRAMS RELATED TO OPEN SPACE WOULD REQUIRE FUTURE DEVELOPMENT TO ACCOMMODATE THE ANTICIPATED INCREASE IN NEW RESIDENTS. THEREFORE, THIS IMPACT WOULD BE LESS THAN SIGNIFICANT.

The City contains 26 parks that total approximately 732 acres of parkland. Stough Canyon Park and Wildwood Canyon Park are the two largest parks in the City. They each serve as recreational and cultural focal points for the community at large. General Plan Open Space and Conservation Element Policy 2.3 establishes a minimum level of three acres per 1,000 persons, with a goal of five acres per 1,000 persons. Implementation of the proposed Project would add an estimated 24,226 residents to the City, increasing Burbank's population from 105,603 residents to approximately 129,829 residents and would decrease the existing parkland ratio of 6.9 acres per 1,000 residents to 5.6 acres per 1,000 residents. However, service ratios would still be above the City's goal.

The following policies and programs from the Burbank2035 General Plan Land Use Element, and programs from the Open Space and Conservation Element and Land Use Element, would require that adequate parks and recreational facilities are provided to accommodate the anticipated increase in new residents:

- Policy 2.2 establishes a standard to provide a community or neighborhood park within 0.5 mile of all residences in the city.
- Policy 2.4 encourages the City to provide additional types of park facilities such as pocket parks, dog parks, athletic fields, amphitheaters, gardens, and shared facilities.
- Policies 3.1 through 3.6 provide specific guidance to the City to maintain existing parks and recreation facilities by rehabilitating facilities, installing improvements (e.g., field lighting).
- Program OSC-2 requires the development of a Park, Recreation, and Community Services Master Plan, which would direct long-term acquisition, operation, management, and programming for parks, open spaces, and recreation facilities. The Master Plan is intended to guide the in-lieu fee structure for the acquisition and management of recreation land in connection with the development review process.
- Program LU-8 requires review and compliance with the community facilities fee program to ensure that new development adequately offsets impacts related to recreational facilities.

Developers of the residential development projects associated with the proposed Project would also be required to pay the City's park facility development fee as required by BMC Section 9-4-1-1103.

These policies and programs are intended to maintain existing levels of service for park and recreation facilities for both existing and new residents. Increased demand associated with an increase in population would require future development to pay the applicable park facility development fees that support the construction of new parks or the expansion of existing parks. The increase in residents would decrease the existing parkland ratio of 6.6 acres per 1,000 residents to 5.5 acres per 1,000 residents, which is still over the City's goal of 5 acres per 1,000 residents (City of Burbank 2013).

In the event that the City constructs a new park or physically alters an existing park or recreational facility, a project-specific environmental analysis would be required under CEQA to address site-specific environmental concerns. Therefore, impacts associated with the provision of new or physically altered parks, or the need for new or physically altered parks would be less than significant.

Determination

Less than significant impact

Threshold 1e:	Would the project result in substantial adverse physical impacts associated with the provision of other public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives?

Impact PS-5 FUTURE DEVELOPMENT PROJECTS UNDER THE PROPOSED PROJECT WOULD RESULT IN AN INCREASE IN POPULATION IN THE CITY, WHICH WOULD INCREASE DEMAND FOR OTHER PUBLIC FACILITIES. HOWEVER, THE SPECIFIC PLAN WOULD NOT CREATE THE NEED FOR NEW OR EXPANDED LIBRARIES. THEREFORE, IMPACTS RELATED TO THE CITY'S LIBRARY SYSTEM WOULD BE LESS THAN SIGNIFICANT.

As discussed in Section 4.12, *Population/Housing*, housing development associated with the proposed Project would add an estimated 24,226 residents to the City; based on the average household size in Burbank of 2.37, increasing Burbank's population from 105,603 (DOF 2024b) to 129,829 during the proposed Project's planning implementation period. Given that not all new residents would visit the library every month, it is unlikely that expansion or construction of new library facilities would be required to accommodate for the increase in population.

As discussed in Section 4.13.1, when compared to other libraries in similar communities as Burbank (Glendale, Pasadena, Santa Monica, Thousand Oaks, Torrance), Burbank is low on space (ranks 5 of 6 at 0.74 square feet per capita) and is moderately well-staffed (ranks 3 of 6 at 0.60 full time equivalent staff per 1,000 population, slightly ahead of Thousand Oaks and Torrance).

Additionally, Program LU-8 in the Burbank General Plan provides DIFs for libraries. As mentioned under Impact PS-1, impacts from development would be offset by payment of DIFs in addition to property taxes and sales taxes to the City. Additionally, potential environmental impacts related to the construction of new or expanded library facilities would be assessed on a project-specific level under CEQA. Therefore, impacts to public library facilities would be less than significant.

Determination

Less than significant impact

4.13.4 Cumulative Impacts

The geographic extent of cumulative analysis for public services is the City of Burbank, particularly areas of anticipated development under the Downtown Burbank Transit Oriented Development (TOD) Specific Plan (an update to the Burbank Center Plan) and the Golden State Specific Plan (GSSP), as described in Section 3, *Environmental Setting*. As described in Section 3, *Environmental Setting,* the Downtown TOD Specific Plan would facilitate development of up to 9,944 residential units and 6,083,657 square feet of commercial and business development land uses; and the GSSP would facilitate development of up to 7,205 residential units and 3,149,623 square feet of commercial and business development land uses. Cumulative impacts may occur if impacts of the proposed Project combine with similar impacts of other projects in the cumulative scenario.

Fire Protection

Cumulative development throughout the City would increase overall demand on fire protection service and may create the need for more firefighters and potentially new facilities. As mentioned under Impact PS-1, impacts to fire protection services from cumulative development would be offset by payment of DIFs, as required by BMC Section 10-1-2206, in addition to property taxes and sales taxes to the City. If new fire protection facilities are determined to be necessary at some point in the future, as buildout within Burbank continues, proposed facilities would undergo separate project-level environmental review. Therefore, the proposed Project's contribution to cumulative impacts associated with fire protection services would not be cumulatively considerable and would be less than significant.

Police Protection

Cumulative development throughout the City would increase overall demand on police protection service and may create the need for more officers and potentially new facilities. As mentioned under Impact PS-2, impacts to police protection services from cumulative development would be offset by payment of DIFs, as required by BMC Section 10-1-2206, in addition to property taxes and sales taxes to the City. If new police protection facilities are determined to be necessary at some point in the future, as buildout within Burbank continues, proposed facilities would undergo separate project-level environmental review. Therefore, the proposed Project's contribution to cumulative impacts associated with police protection services would not be cumulatively considerable and would be less than significant.

Schools

Cumulative development throughout the City would introduce additional student-age residents which would increase overall demand on schools in Burbank and may create the need for new school facilities. As discussed under Impact PS-3, the need for additional school services would be addressed through the payment of school impact fees as authorized by California Education Code Section 17620 for impacts associated with cumulative development. If new school facilities are determined to be necessary at some point in the future, as buildout within Burbank continues, proposed facilities would undergo separate project-level environmental review. Therefore, the proposed Project's contribution to cumulative impacts associated with schools would not be cumulatively considerable and would be less than significant.

Parks

Overall development intensity would increase throughout the City with implementation of the proposed Project in conjunction with the three aforementioned Specific Plans, which would increase the use of existing parks. Developers of future developments under the proposed Project would be required to provide parkland dedications, improvements, or in-lieu payments to comply with the City's goal of five acres of parkland per 1,000 residents. Residents of the future development projects accommodated by the proposed Project, the Burbank Downtown TOD Specific Plan, and the GSSP, as with all residents of the region, would have access to the local and regional recreational facilities detailed in Section 4.13.1, *Setting*. Provision of parkland dedications, improvements, or in-lieu payments would ensure that the incremental effect of the proposed Project related to adverse physical impacts associated with the need for or provision of new or improved parks would not be cumulatively considerable and cumulative impacts would be less than significant.

Libraries

Burbank is served by multiple library branches. Therefore, it is unlikely that expansion or construction of new library facilities would be required. If new library facilities are determined to be necessary at some point in the future to accommodate increases in growth under the cumulative scenario, proposed buildings would undergo separate project-level environmental review. As mentioned under Impact PS-5, cumulative impacts to libraries from development would be offset by payment of DIFs, as required by BMC Section 10-1-2206, in addition to property taxes and sales taxes to the City. Therefore, the proposed Project's contribution to cumulative impacts associated with libraries would not be cumulatively considerable and would be less than significant.

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4.14 Recreation

This section evaluates the potential environmental impacts related to recreational resources associated with implementation of the proposed Project. Specifically, this section reviews the proposed Project's impact related to increased use of existing neighborhood and regional parks such that physical deterioration of the facility would occur or be accelerated. The other threshold of significance associated with the requirement of construction or expansion of recreational facilities is discussed in Section 4.19, *Effects Found Not to be Significant*; therefore, this issue is not studied further herein.

4.14.1 Environmental Setting

a. Specific Plan Area Setting

Recreational resources in the City of Burbank (hereafter referred to as "City" or "Burbank") include public parks and open space, such as Wildwood Canyon Park, Stough Park, Buena Vista Park, and Brace Canyon Park. Open space within the Burbank Media District Specific Plan Area (hereafter referred to as "Specific Plan Area") is scarce due to its urban setting. Open areas in the Specific Plan Area or in the vicinity of the Specific Plan Area that provide habitat for nesting birds and common terrestrial wildlife include Buena Vista Park, Johnny Carson Park, Lakeside Country Club, and Forest Lawn Memorial Park.

Neighboring the Burbank Studios and Walt Disney Studio lots is Johnny Carson Park, a 17.6-acre open space and recreation area featuring amenities, such as fitness equipment, picnic tables, a playground, stage, little free library, and a walking trail (City of Burbank 2013). The park also hosts various cultural arts festivals and events that make it compatible with the entertainment uses of the Specific Plan Area. The Johnny Carson Park was remodeled in 2016, which included restoration of the Tujunga Wash Creek that flows through the park and into the Los Angeles River.

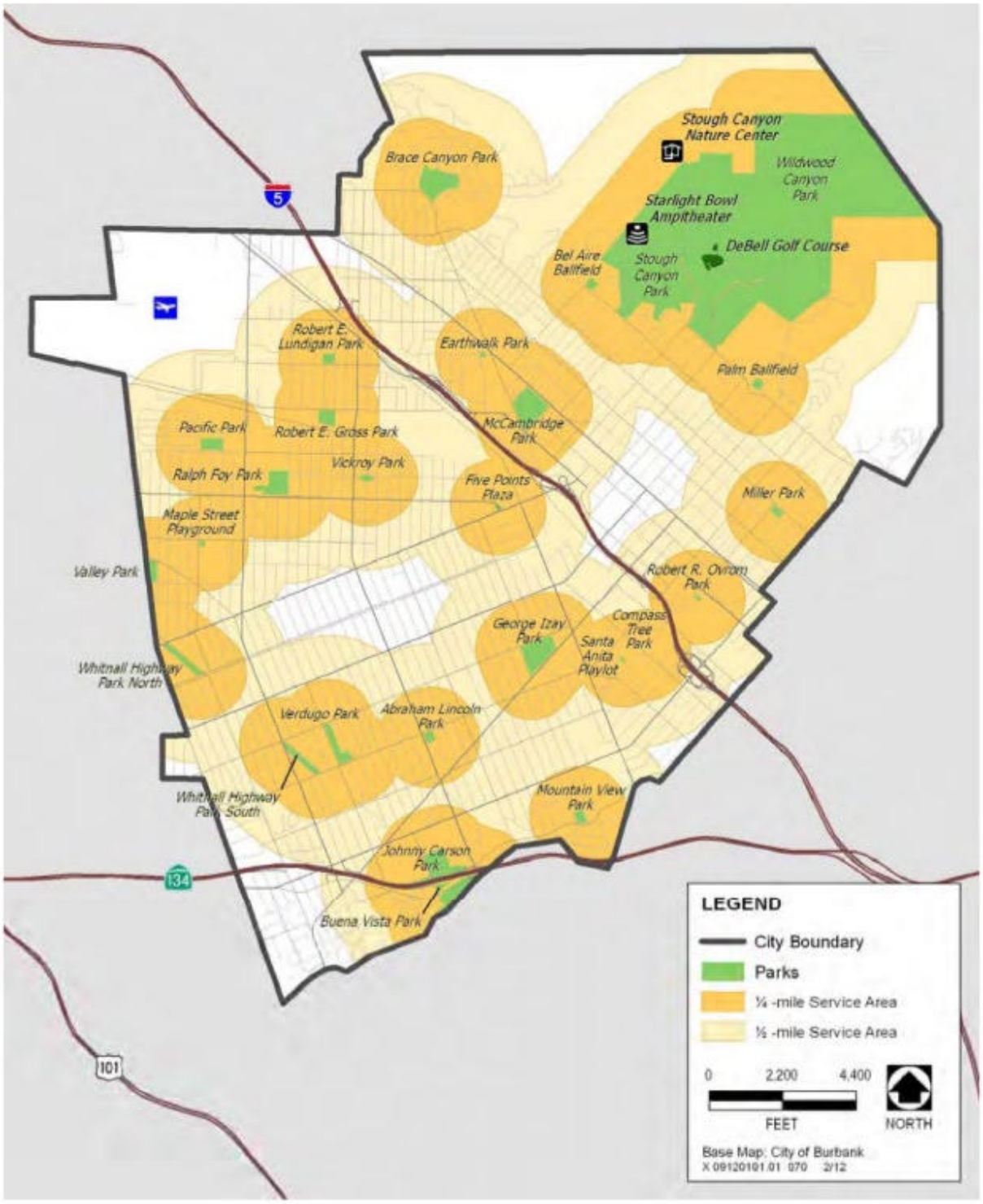
b. Citywide Existing Conditions

Burbank is located in the central portion of Los Angeles County, approximately 12 miles north of Downtown Los Angeles. The northeastern part of the City is located along the foothills of the Verdugo Mountains, and the western edge of the City is located near the eastern part of the San Fernando Valley. The City is bisected by Interstate 5 (I-5) and is adjacent to the developed areas of the cities of Los Angeles and Glendale.

The City of Burbank Parks and Recreation Department owns and operates parks and recreational facilities throughout the City. These include 26 park sites, totaling approximately 732 acres (City of Burbank 2013). The types of parks in the City range from smaller "pocket" parks to regional parks. The breakdown of these park classifications is based primarily on size, as listed below in Table 4.14-1. Figure 4.14-1 provides a map of all the parks in the City.

- Pocket parks – based on acreage totals for parks which are less than 1 acre in size
- Neighborhood parks – based on acreage totals for parks which are 1 – 10 acres in size
- Community parks – based on acreage totals for parks which are 10 – 50 acres in size
- Regional parks – based on acreage totals for parks which are 50+ acres in size

Figure 4.14-1 Parks in the City of Burbank



While pocket and neighborhood parks are generally meant to serve immediately adjacent areas, residents often use parks, parkland, and recreational facilities in areas outside of their general community. A breakdown of parks, recreational, and open space totals within City limits is shown in Table 4.14-1.

Table 4.14-1 City of Burbank Parks, Recreation, and Open Space

Park Type	Total Acreage	Acres per 1,000 Persons
Pocket	2.02	0.02
Neighborhood	55.43	0.52
Community	70.83	0.67
Regional	603.57	5.69
Total	**731.85**	**6.9**

[1] Acres per 1,000 residents

Source: City of Burbank 2013; includes the service levels recommended by National Recreation and Park Association

The Burbank2035 General Plan has a Citywide parkland level of service goal of five acres of parkland per 1,000 persons. Based on the 2023 Citywide population of 105,804 persons (California Department of Finance [DOF] 2024) and a total of approximately 732 available acres of parkland, the City currently provides approximately 6.9 acres of parkland per 1,000 residents. Total park acreage includes regional parks, recreation centers, pools, senior centers, trails, picnic areas, and playgrounds. As shown in Table 4.14-2, available parkland currently meets the City's parkland level of service goal.

Table 4.14-2 City of Burbank Parkland Ratio

Total Existing Parkland Acres[1]	Population[2]	Acres per 1,000 Persons	Goal	Meets Goal?
732	105,804	6.9	5 acres of parkland per 1,000 persons	Yes

[1] City of Burbank 2013

[2] DOF 2024

As shown in Table 4.14-1, there are approximately 732 acres of recreational space in the City, including pocket, neighborhood, community, and regional parks. The City has two regional parks, Stough Canyon Park and Wildwood Canyon Park, which are both located in the Verdugo Mountains and comprise the majority of parkland in the City. These two regional parks are undeveloped open space providing passive recreational opportunities, including trails and observation points. As stated in the Burbank2035 General Plan *Open Space and Conservation Element*, without including the two regional parks in the calculation of parkland acreage ratio, the ratio would be 1.2 acres per 1,000 residents, which is considered low by most nationally accepted parkland standards (City of Burbank 2013).

4.14.2 Regulatory Setting

a. State Regulations

Quimby Act

The Quimby Act was established by the California legislature in 1965 to provide parks for growing communities in California. The Quimby Act authorizes cities to adopt ordinances requiring dedication of land, payment of in-lieu fees, or a combination of both as a condition to the approval of a tentative map or parcel map for a residential subdivision for the purpose of developing or rehabilitating park and recreational facilities. Under the Quimby Act, cities can require land or in-lieu fees for the provision of three acres of park area per 1,000 persons residing within a subdivision, unless the amount of existing neighborhood and community park area exceeds that limit, in which case the City may adopt a higher standard not to exceed five acres per 1,000 residents. The Quimby Act also specifies acceptable uses and expenditures of such funds.

b. Local Regulations

Burbank2035 General Plan

The *Open Space and Conservation Element* of the Burbank2035 General Plan includes several objectives, policies, and actions relating to recreational open space as listed below:

Goal 2: Parks, open space and recreation facilities contribute to the high quality of life enjoyed by Burbank residents and the economic value of the community.

- **Policy 2.1:** Identify areas of the City that are currently underserved and focus park expansion and open space acquisition in these areas.
- **Policy 2.2:** Provide a community or neighborhood park within 1/2 mile of all Burbank residences.
- **Policy 2.3:** Provide park and recreation facilities at a minimum level of 3 acres per 1,000 persons, with the goal of 5 acres per 1,000 persons.
- **Policy 2.4:** Seek opportunities to develop additional parks and open space in areas where needed, including pocket parks, dog parks, athletic fields, amphitheaters, gardens, and shared facilities.

Goal 3: Parks and recreation facilities are improved and maintained to ensure they meet the needs of the community.

- **Policy 3.1:** Improve and rehabilitate existing parks and recreation facilities.
- **Policy 3.4:** Provide low-maintenance, vandal-resistant parks, recreation facilities, and equipment.

Goal 5: Parks, trails, and open spaces are connected within the City and to regional open spaces.

- **Policy 5.4:** Require that new development projects provide public access to adjacent open space areas.

As stated in the Burbank2035 General Plan *Open Space and Conservation Element*, the City will prioritize new parks in locations where residences are not located within 1/2 mile of a park, to the extent feasible, and will seek vacant and underutilized lots as they become available and as funding allows. In addition, the City will prioritize accessibility as a major factor in the selection of future park

sites to prevent locations that are inaccessible, lack usable open space, or otherwise constrained (City of Burbank 2013).

The *Open Space and Conservation Element* also establishes a requirement applicable to new development of three acres of new parkland per 1,000 new residents, which is intended to correct existing parkland deficiencies as new development and redevelopment occur. Established City standards included in Burbank2035 General Plan *Open Space and Conservation Element* for the acquisition of new parkland include:

- The service area should not be divided by natural or human-made barriers, such as arterial highways, railroads, freeways, and commercial or industrial areas that would render the site inaccessible or undesirable as a park.
- Neighborhood parks should be located adjacent to elementary schools, whenever possible. The primary consideration should be whether the existing school has adequate play space to serve both its educational needs and the needs of the neighborhood for playground space.
- The site for a community park should be of sufficient size to include a recreation building unless adjacent school facilities can be designated to serve public uses when school is not in session.
- Neighborhood parks should have street frontage. If a park is located where adjacent streets are insufficient for parking, the site should have a parking lot. Community park sites should be readily accessible from pedestrian and bicycle routes.
- All neighborhood and community park sites should be accessible by foot or by bicycle.

Burbank Municipal Code

The City of Burbank requires the payment of development impact fees (DIFs) to offset the impacts of new developments on City facilities. As stated in Burbank Municipal Code (BMC) Title 10 (Zoning Regulations) Article 22 (Community Facility Fees), DIFs are collected for the purpose of financing capital improvements including park and recreation fees (except fees charged in lieu of park land dedication pursuant to Government Code Section 66477). Per BMC Title 10, Chapter 1, Section 10-1-2204, Definitions, DIFs are collected for the purpose of defraying all or a portion of the cost of certain capital improvements related to a development project. Per BMC Title 10, Chapter 1, Section 10-1-2208, DIFs shall be used exclusively for the capital improvements for which the development fees were collected. These fees do not usurp Park and Recreation fees charged in lieu of park land dedication pursuant to Government Code Section 66477, Quimby Act. The current rates for DIFs are specified within Article VIII, Electrical and Building Permits, Section 3, Development Impact Fees, of the City's Adopted Citywide Fee Schedule. Fees are determined at a rate per square foot or per dwelling unit depending on the nature of the project; the square footage of the development or the dwelling unit count determines the total fee to be paid. A portion of development fees collected by the City are distributed to public facilities, including parks and recreation facilities.

Under BMC Title 11, Chapter 1, Article 13, Section 11-1-1301, developers of most residential development projects requesting a subdivision are required to either dedicate land for recreation and park purposes, pay an in-lieu fee as designated in the Burbank Fee Resolution, or do both. The in-lieu fees need to be spent on providing park and recreation facilities to serve the development that paid the fee. BMC Title 9, Chapter 4, Article 1, Sections 9-4-1-1103 and 9-4-1-1104 define the City's requirement of a parks facility development fee for each new single family or multi-family dwelling unit. Sections 9-4-1-1103 and 9-4-1-1104 define how the park facility fees shall be imposed, collected, and used.

4.14.3 Impacts Analysis

a. Thresholds of Significance

For the purposes of this environmental analysis, thresholds of significance are based on the questions in Appendix G of the *CEQA Guidelines*, which state that impacts related to recreation would be potentially significant if implementation of the proposed Project would do any of the following:

1. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
2. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Threshold 1 is analyzed below.

b. Effects Found Not to be Significant

Threshold 2 was determined to have a less than significant impact and, therefore, is discussed under Section 4.19, *Effects Found Not to be Significant and* summarized below.

The anticipated population increase associated with the proposed Project would decrease the existing parkland ratio of 6.9 acres per 1,000 residents to 5.6 acres per 1,000 residents. This ratio is a decrease from the current ratio; however, it would still meet the City's goal of five acres of parkland per 1,000 residents. BMC regulations and the proposed Project policy identified in Section 4.19.12, *Recreation*, are intended to maintain existing levels of service for park and recreation facilities for both existing and new residents. Increased demand associated with a corresponding increase in population would not require construction of new or expanded parks and recreation facilities because development would be required to pay the applicable park facility development fees, which would fund future development of new or expanded parks and recreation facilities. While impact fees are required for developers to support the addition of recreational facilities such as parks, the proposed Project would not directly introduce or expand existing recreational facilities that would affect the environment. Therefore, impacts would be less than significant.

c. Methodology

This analysis considers the *CEQA Guidelines* Appendix G thresholds, as described above, in determining whether the proposed Project would result in impacts related to the physical deterioration of existing parks and recreation facilities in the Specific Plan Area. Parks and recreation facilities information was acquired through review of relevant documents, such as the Burbank2035 General Plan and BMC.

For the baseline conditions, in accordance with *CEQA Guidelines* Section 15125, "a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence" where necessary to provide the most accurate description of the existing conditions. As such, due to the preparation time needed to complete the Draft Specific Plan and Draft EIR, this section utilizes the 2024 population data from the DOF.

d. Project Impacts

Threshold 1:	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Impact REC-1 DEVELOPMENT UNDER THE PROPOSED PROJECT MAY INCREASE THE USE OF EXISTING PARKS AND OPEN SPACE, BUT THE BURBANK2035 GENERAL PLAN INCLUDES POLICIES THAT REQUIRE NEW DEVELOPMENTS TO CONTRIBUTE TO RECREATIONAL FACILITIES, AS WELL AS CITY PARK DEDICATION FEES AND DEVELOPMENT IMPACT FEES, WHICH WOULD OFFSET RECREATIONAL FACILITY IMPACTS. THEREFORE, POTENTIAL IMPACTS RELATED TO SUBSTANTIAL PHYSICAL DETERIORATION OF RECREATIONAL FACILITIES WOULD BE LESS THAN SIGNIFICANT.

Housing development associated with the proposed Project would add an estimated 24,226 residents to the City (based on the average household size in Burbank of 2.37, increasing Burbank's population from 105,804 (DOF 2024b) to 129,829 during the proposed Project's planning and implementation period. The increase in residents would decrease the existing parkland ratio of 6.9 acres per 1,000 residents to 5.6 acres per 1,000 residents. This ratio would still meet the City's goal of five acres of parkland per 1,000 residents.

In addition, the Burbank2035 General Plan Open Space and Conservation Element establishes a requirement of three acres of new parkland per 1,000 new residents, which is intended to correct existing parkland deficiencies as new development and redevelopment occurs. This requirement applies to large residential developments and would result in parkland dedications, improvements, or in-lieu payments if a project applicant is not able to dedicate land or the land is considered unsuitable for park or recreation use. The proposed Project would include residential development projects that would need to comply with this requirement. The Specific Plan Area is largely built out, which makes locating new parks difficult. Developers of the residential development projects under the proposed Project would need to provide dedicated parkland on the project site, parkland improvements, or pay in-lieu fees if they are unable to dedicate land or if the land is considered unsuitable for park or recreation use in order to comply with the Burbank2035 General Plan's requirement of three acres of new parkland per 1,000 new residents.

In addition, the following policies and programs from the Burbank2035 General Plan Open Space and Conservation Element and Land Use Element would require that adequate parks and recreational facilities be provided to accommodate the anticipated increase in new residents:

- Policy 2.2 establishes a standard to provide a community or neighborhood park within 0.5 mile of all residences in the City.
- Policy 2.4 encourages the City to provide additional types of park facilities such as pocket parks, dog parks, athletic fields, amphitheaters, gardens, and shared facilities.
- Policy 3.1 requires improvement and rehabilitation of existing parks and recreation facilities.
- Policy 3.2 requires improvement of existing athletic fields with lights, equipment, and seating.
- Policy 3.3 requires the development of a clear and unified system for identification and directional signs for parks and recreation facilities.
- Policy 3.4 requires the City provides low-maintenance, vandal resistant parks, recreation facilities, and equipment.
- Policy 3.5 requires adequate lighting is provided in parking areas to ensure user safety.

- Policy 3.6 requires improvement and maintenance of parks and recreation facilities access to accommodates persons with disabilities.
- Program OSC-2 requires the development of a Park, Recreation, and Community Services Master Plan, which would direct long-term acquisition, operation, management, and programming for parks, open spaces, and recreation facilities. The Master Plan is intended to guide the in-lieu fee structure for the acquisition and management of recreation land in connection with the development review process.
- Program LU-8 requires review and compliance with the community facilities fee program to ensure that new development adequately offsets impacts related to recreational facilities.

Developers of the residential development projects associated with the proposed Project would also be required to pay the City's park facility development fee as required by BMC Sections 9-4-1-1103 and 10-1-2227.

These policies and programs are intended to maintain existing levels of service for park and recreation facilities for both existing and new residents and prevent deterioration of existing parks and recreation facilities. Policies 3.1 through 3.6 provide specific guidance to the City to maintain existing parks and recreation facilities by improving and rehabilitating existing facilities, which would reduce the risk of deterioration of parks and recreation facilities related to implementation of the proposed Project.

Goal 3.1 of the City Parks Master Plan is to "improve park maintenance by focusing on sports fields, hardscape areas, and planter areas, while utilizing computer maintenance management software for scheduled and planned tasks to support a lifecycle management program of park assets (City of Burbank 2024). Additionally, the City Parks Master Plan identifies improvements required and funding budget for such improvements to the Johnny Carson Park, within the Specific Plan Area. These improvements include the addition of a shade structure, renovations to the trail, and turf renovations which are planned to occur between the financial years of 2024 to 2029 (City of Burbank 2024). Implementation of Goal 3.1 and the Johnny Carson Park improvements of the City Parks Master Plan would reduce the risk of deterioration of parks and recreation facilities, including Johnny Carson Park, related to implementation of the proposed Project.

Increased demand associated with a corresponding increase in population may result in the physical deterioration of parks within the Specific Plan Area or in the vicinity; however, development under the proposed Project would be required to pay the applicable park facility development fees, pursuant to BMC Sections 9-4-1-1103, 9-4-1-1104, and 10-1-2227. Payment of impact fees and the anticipated enhancement or maintenance of facilities with funds provided by these fees would help offset the deterioration of existing recreation facilities by providing funds for facility improvements and replacement of deteriorating equipment.

As described above, compliance with the Burbank2035 General Plan policies and programs and the Parks Master Plan, and payment of park facility development fees as required by the BMC would offset the proposed Project's potential impacts related to the deterioration of existing recreation facilities, and impacts would be less than significant.

Determination

Less than significant impact

4.14.4 Cumulative Impacts

The geographic extent of cumulative analysis for land use and planning is the City of Burbank, including the Downtown Burbank Transit Oriented Development (TOD) Specific Plan (a consolidation and update North San Fernando Boulevard Master Plan and the Burbank Center Plan) and the Golden State Specific Plan (GSSP) that are currently being prepared by the City, as described in Section 3, *Environmental Setting*. As described in Section 3, *Environmental Setting,* the Downtown TOD Specific Plan would facilitate development of up to 9,944 residential units and 6,083,657 square feet of commercial and business development land uses; and the GSSP would facilitate development of up to 7,205 residential units and 3,149,623 square feet of commercial and business development land uses. Cumulative impacts may occur if impacts of the proposed Project combine with similar impacts of other projects in the cumulative scenario.

Development under the proposed Project would be consistent with the Burbank2035 General Plan goals and policies intended to ensure that adequate parks and recreational facilities are provided to accommodate the anticipated increase in new residents. Recreation and policy consistency impacts associated with the buildout of the Burbank Downtown TOD Specific Plan and GSSP would be addressed on a case-by-case basis to determine consistency with applicable plans and policies. Overall development intensity would increase throughout the City with implementation of the proposed Project in conjunction with the two aforementioned Specific Plans, which would increase the use of existing parks such that substantial physical deterioration of the facility would occur or be accelerated. Developers of large residential developments would be required to provide parkland dedications, improvements, DIFs, and/or in-lieu payments to comply with the City's goal of five acres of parkland per 1,000 residents. Residents of the future development projects accommodated by the proposed Project, the Burbank Downtown TOD Specific Plan and GSSP, as with all residents of the region, would have access to the local and regional recreational facilities detailed in Section 4.14.1, Setting. Compliance with the policies, programs, and regulations detailed under Impact REC-1 would ensure that the incremental effect of the proposed Project related to the deterioration of parks and recreational facilities would not be cumulatively considerable and cumulative impacts would be less than significant.

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4.15 Transportation

This section evaluates potential environmental impacts related to transportation associated with implementation of the proposed Project. Specifically, this section reviews the proposed Project's impacts related to consistency with *CEQA Guidelines* Section 15064.3, subdivision (b). Other thresholds of significance associated with consistency with plans addressing the circulation system, hazards due to a geometric design feature, and inadequate emergency access are discussed in Section 4.19, *Effects Found Not to be Significant*; therefore, these issues are not studied herein.

4.15.1 Environmental Setting

a. Circulation System

Regional and Local Roadway Network

The Burbank Media District Specific Plan Area (hereafter referred to as "Specific Plan Area") is bisected by State Route 134 (SR-134) and West Olive Avenue. A grid system of east-west and north-south roadways, including arterials, collectors, and local streets, provide vehicular access throughout the Specific Plan Area. The major roadways in the Specific Plan Area include West Olive Avenue, SR-134, West Riverside Drive, and North Pass Avenue. The closest freeways, which provide regional access to the Specific Plan Area and connect neighboring cities and communities to the Specific Plan Area, are SR-134 in the east-west direction and Interstate 5 (I-5) in the north-south direction. I-5 is located approximately 1.5 miles east of the Specific Plan Area.

The roadway network in the Specific Plan Area are shown in Figure 4.15-1.

The City contains public streets that accommodate motorized vehicles, including private motorized vehicles, taxis, freight vehicles, and transit vehicles. Walking and bicycling are also important components of the local roadway network. Most roadways in the City are organized on a few grid systems. Below is a brief description of the types of the streets and traffic control systems in the City based on the *Burbank2035* General Plan Mobility Element and Complete Our Streets Plan (City of Burbank 2020).

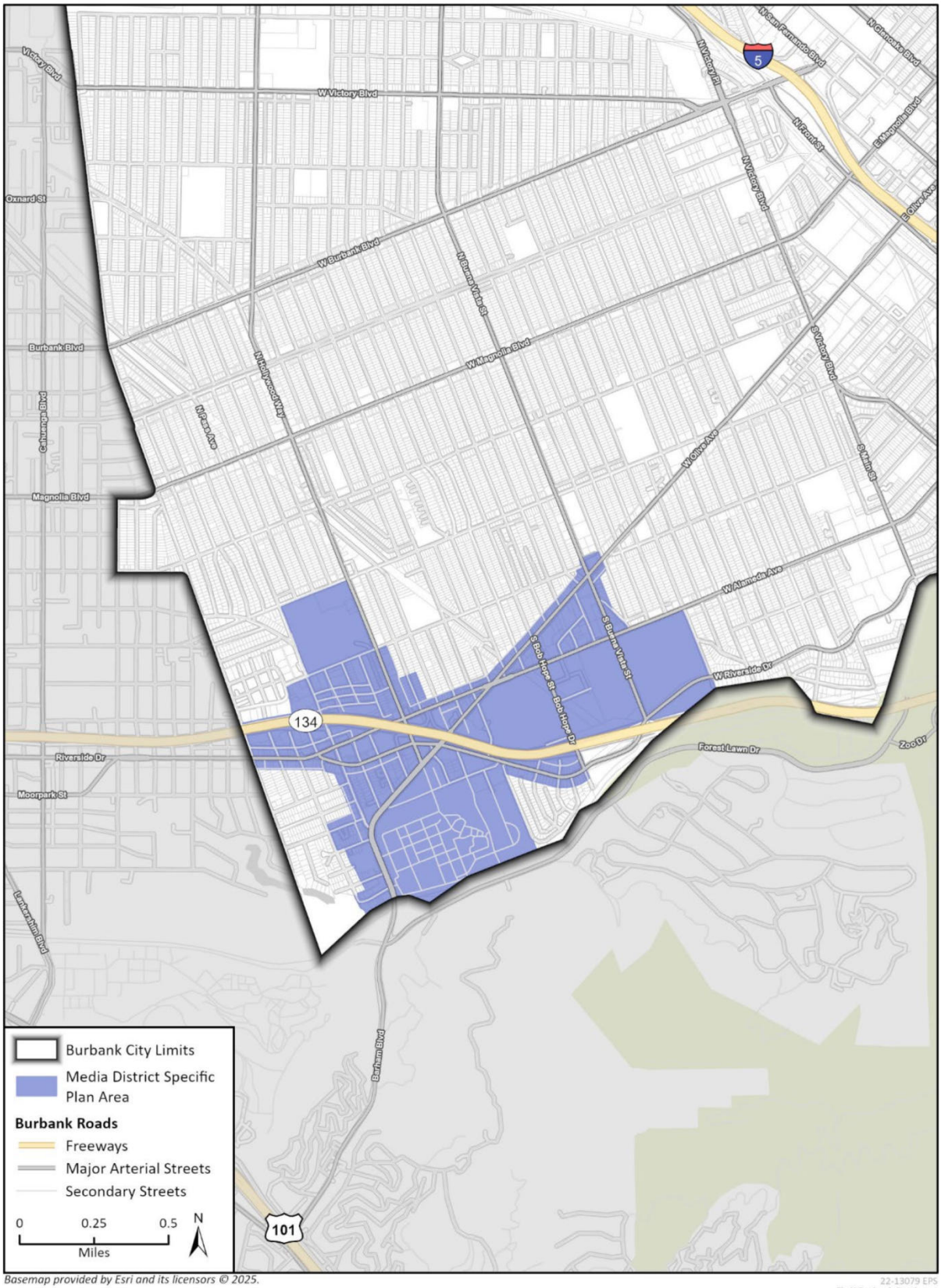
- **Major and Secondary Arterial Streets:** Generally defined as having at least two lanes in each direction along with a median-turn lane. The widths of Major and Secondary Arterial Streets are usually 68 to 76 feet with a typical parkway[1] width of 6 to 16 feet.
- **Downtown Collectors:** Generally defined as having one lane in each direction along with a median-turn lane. The widths of Downtown Collectors are usually 44 to 60 feet with a typical parkway width of 12 to 15 feet. Such streets are in the downtown commercial core of the City and prioritize walking over all other modes.
- **Neighborhood Collectors or Locals:** Generally defined as having one lane in each direction and no median-turn lane. The width of Neighborhood Collectors or Locals is usually 36 feet with a typical parkway width of 12 feet. Such streets are typically intended for vehicle trips that start or end in the immediate vicinity of the street.

[1] A parkway is defined as the landscaped area between a sidewalk and street curb.

- **Signalized Intersections and Traffic Control Devices:** The City of Burbank's Intelligent Transportation System (ITS) is a computer-based traffic signal control system that monitors traffic conditions and system performance to allow ITS operations to manage signal timing to improve traffic flow conditions. This system allows monitoring and control of the signals from a central operations center. The importance of linking to the ITS system is the ability to coordinate the signals in relationship with other signals along a travel corridor. Signal coordination minimizes delay due to stops and enhances vehicle flow. In addition, City staff can manually adjust traffic signals remotely from the central operations center to respond to collisions, weather, special events, and other major incidents. The ITS network is located along most arterial streets. The City's traffic signal system is interconnected with the Los Angeles County traffic signal Information Exchange Network (IEN) and shares information with Los Angeles City and County, and the cities of Glendale and Pasadena. Traffic signal timing is also coordinated with the California Department of Transportation (Caltrans).

Existing arterial streets (Major and Secondary) are illustrated in Figure 4.15-1 along with interstate freeways and state highways.

Figure 4.15-1 Roadways in Burbank



Public Transit

Transit service in the City is provided by multiple transit operators, including the Los Angeles County Metropolitan Transportation Authority (Metro), BurbankBus, Metrolink, Amtrak, and other local operators, with networks connecting communities within and outside the City of Burbank. Figure 4.15-2 illustrates existing transit routes for Metro, BurbankBus, and Metrolink. Below are brief descriptions of the primary transit operators that provide service within the city:

- **Metro** is the primary transit operator in Los Angeles County, providing bus and subway services. Metro provides local bus lines within the City of Burbank.
- **BurbankBus** provides additional local bus service within the City of Burbank. The three routes comprising the BurbankBus system connect key destinations, including the Specific Plan Area, two Metro subway stations, two Metrolink stations, and the Hollywood Burbank Airport.
- **Metrolink** provides commuter rail service throughout the greater Los Angeles region. The Metrolink system includes three stations within the City of Burbank. Metrolink service focuses on the peak commute hours but also provides some off-peak service.
- **Amtrak** provides regional and inter-regional rail service via the Pacific Surfliner route and connects San Diego, Orange County, Los Angeles, Ventura, Santa Barbara, and San Luis Obispo. Service is provided to Burbank via the Burbank Airport South Metrolink Station, along with limited stops at the Downtown Burbank Station. Amtrak offers four daily round trips serving Burbank.

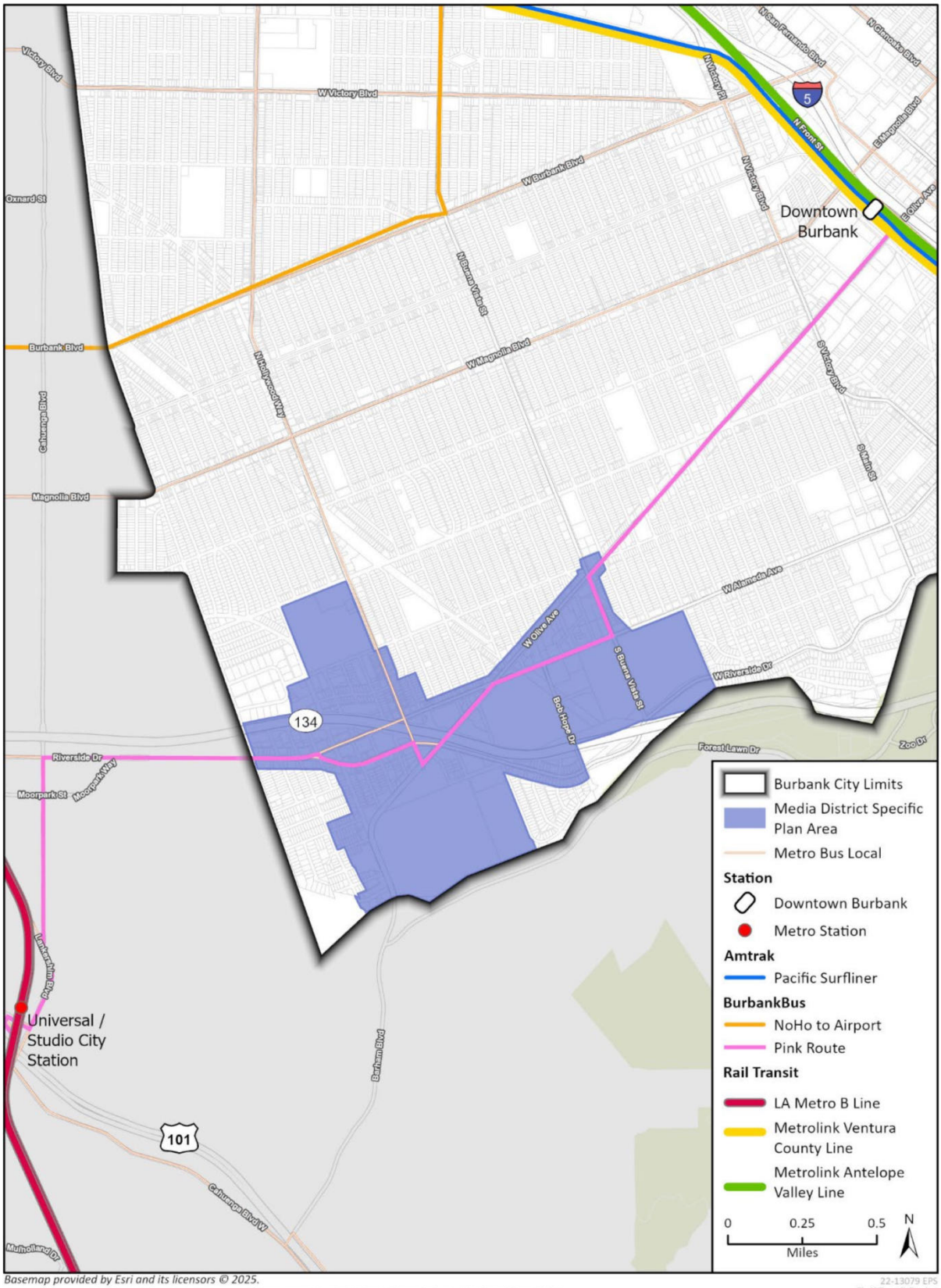
At a lesser scale, the Specific Plan Area is also served by the City of Los Angeles Department of Transportation's Commuter Express Lines 549 and 419, Santa Clarita Transit 794 Union Station Route, and Glendale Beeline Routes 7 and 12.

Bicycle Network and Pedestrian Facilities

The City's existing bicycle network consists of on- and off-street facilities. Bicycle facilities are defined as off-street bicycle paths (Class I), on-street signed and striped bicycle lanes delineated by paint (Class II), on-street signed bicycle routes delineated by sharrows showing the preferred bicyclist lane position, or bike boulevard markings or signs (Class III), and protected bicycle lanes or cycle tracks (Class IV). Existing bicycle facilities are presented in Figure 4.15-3.

Pedestrian travel in the City varies based on the circulation network in any given area. Areas that have pedestrian-oriented uses fronting the sidewalk offer a pedestrian-friendly atmosphere, whereas other areas characterized by long blocks fronting surface parking lots and auto-oriented uses offer few pedestrian amenities. In general, sidewalks range from 6 to 16 feet wide.

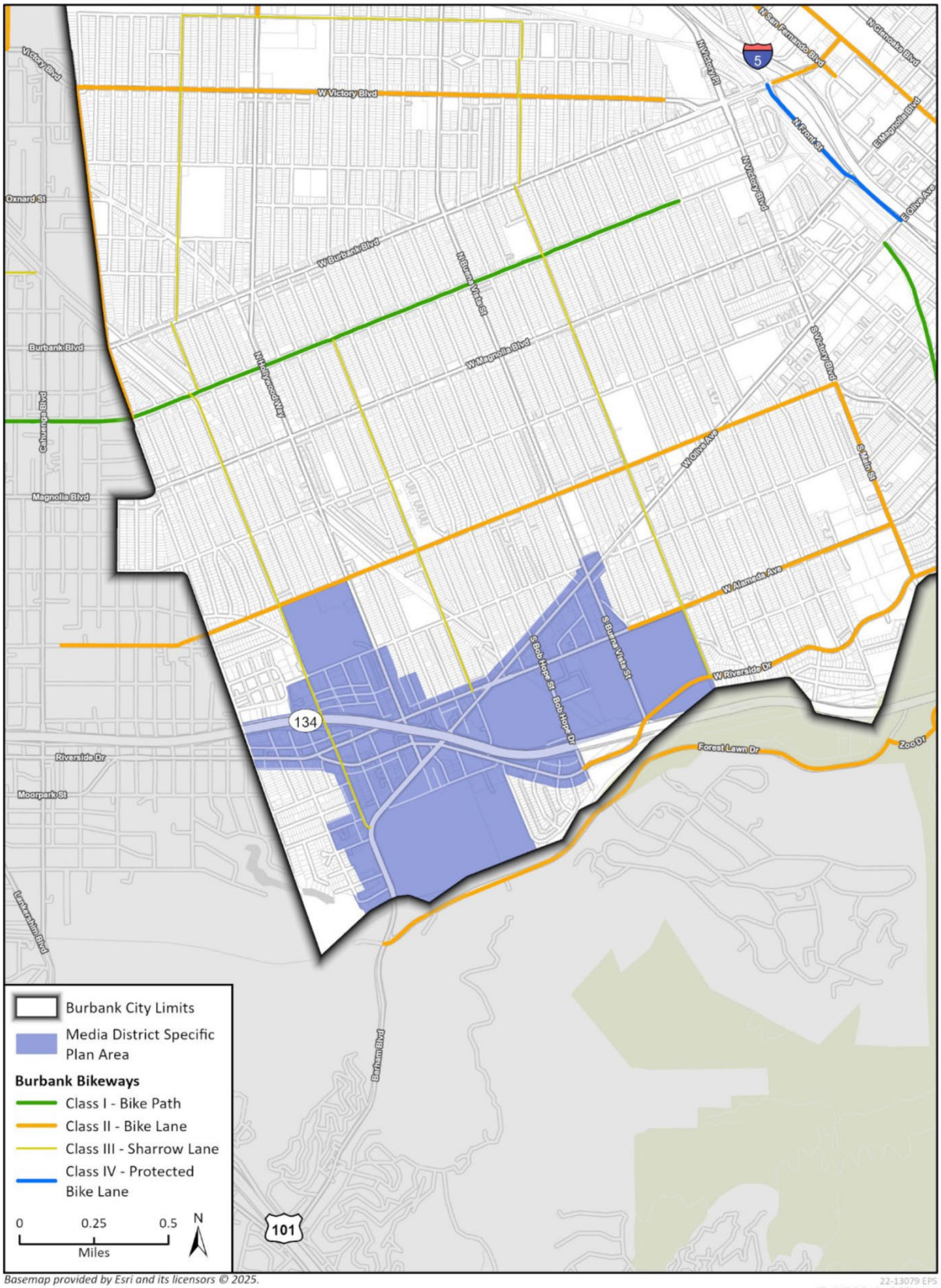
Figure 4.15-2 Transit Routes in Burbank



Basemap provided by Esri and its licensors © 2025.
Transit data provided by California Department of Transportation, LA Metro, Metrolink, and Burbank Bus, 2025.

22-13079 EPS
Fig X Transit Routes

Figure 4.15-3 Bikeways in Burbank



Basemap provided by Esri and its licensors © 2025.
Bikeway data provided by LA County, 2025.

22-13079 EPS
Fig 4.15-3 Burbank Bikeways

4.15.2 Regulatory Setting

a. State Regulations

Senate Bill 375 (SB 375)

SB 375, signed in August 2008, enhances the State's ability to reach Assembly Bill (AB) 32 goals by directing CARB to develop regional greenhouse gas (GHG) emission reduction targets to be achieved from passenger vehicles for 2020 and 2035. In addition, SB 375 directs each of the State's 18 major Metropolitan Planning Organizations (MPO) to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On March 22, 2018, CARB adopted updated regional targets for reducing GHG emissions from 2005 levels by 2020 and 2035. Southern California Association of Governments (SCAG) was assigned targets of an 8 percent reduction in GHGs from transportation sources by 2020 and a 19 percent reduction in GHGs from transportation sources by 2035. In the SCAG region, SB 375 also provides the option for the coordinated development of subregional plans by the subregional councils of governments and the county transportation commissions to meet SB 375 requirements.

Senate Bill (SB) 743

Senate Bill 743 (SB 743) was signed into law on September 27, 2013, and directed the Governor's Office of Land Use and Climate Innovation (LCI) (formerly known as the Office of Planning and Research) to develop revisions to the *CEQA Guidelines* to establish new criteria for determining the significance of transportation impacts. SB 743 was enacted, in part, as further implementation of California's Climate Action Plan to meet California Global Warming Solutions Act (Assembly Bill 32) GHG emission reduction targets. SB 743 seeks to reduce criteria air pollutants and GHG emissions in the transportation sector by reducing vehicle miles traveled (VMT). SB 743 changed the approach to transportation impact analysis by establishing measures such as VMT, VMT per capita, or automobile trip generation rates as the primary measures of transportation impacts and eliminates the traditionally used measures of auto delay, level of service (LOS), and other measures of traffic congestion as a basis for determining significant impacts.

In December 2018, LCI adopted and promulgated its changes to the *CEQA Guidelines* (14 California Code of Regulations Section 15000 et seq.) in response to SB 743. Section 15064.3 of the CEQA Guidelines contains the operative language for implementing the goals of SB 743 when determining the significance of a project's transportation impacts.

CEQA Guidelines Section 15064.3

Recent changes to CEQA include the adoption of Section 15064.3, Determining the Significance of Transportation Impacts. *CEQA Guidelines* Section 15064.3 establishes VMT as the most appropriate measure of transportation impacts. Generally, land use projects within 0.5 mile of either an existing major transit stop[2] or a stop along an existing high-quality transit corridor[3] should be presumed to cause a less than significant transportation impact. Projects that decrease VMT in a project area compared to existing conditions should be presumed to have a less than significant transportation

[2] "Major transit stop" is defined in Public Resources Code Section 21064.3 as a site containing an existing rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 20 minutes or less during the morning and afternoon peak commute periods.
[3] "High-quality transit corridors" are defined in Public Resources Code Section 21155 as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

impact. A lead agency has discretion to choose the most appropriate methodology to evaluate VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may also use models to estimate VMT and may revise those estimates to reflect professional judgment supported by substantial evidence. For example, for programmatic planning documents covering a large geographical area (such as the proposed Project), a lead agency may use regional models, such as the Southern California Association of Governments (SCAG) RTP/SCS travel demand model since it includes land use and transportation assumptions for specific cities in its jurisdiction and the greater SCAG region.

The following is an excerpt from *CEQA Guidelines* Section 15064.3, Subdivision (b):

> "**Land Use Projects.** Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.
>
> [...]
>
> **Qualitative Analysis.** If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.
>
> **Methodology.** A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section."

b. Regional Regulations

SCAG 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy

As the metropolitan planning organization for the region's six counties and 191 cities, SCAG is mandated by law to develop a long-term RTP and SCS every four years. On April 4, 2024, SCAG's Regional Council approved and fully adopted the 2024–2050 RTP/SCS, which is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. The 2024-2050 RTP/SCS identifies goals that fall into four categories: mobility, communities, environment and economy. The 2024-2050 RTP/SCS is discussed further in Section 4.10*, Land Use and Planning*, of this Draft EIR.

4.15.3 Impact Analysis

a. Thresholds of Significance

According to Appendix G of the *CEQA Guidelines*, impacts related to transportation would be potentially significant if implementation of the proposed Project would do any of the following:

1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
2. Conflict or be inconsistent with *CEQA Guidelines* Section 15064.3, subdivision (b);
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment); or
4. Result in inadequate emergency access.

Threshold 2 is analyzed below.

As of July 1, 2020, the City of Burbank is required to analyze transportation impacts using VMT. In response to this requirement, the City of Burbank developed interim guidance on how projects should be analyzed for VMT impacts. Based on standard LCI guidance and City interim guidance applied to programmatic planning documents, such as the proposed Project, the proposed Project would have an impact related to transportation if it would result in VMT per service population, VMT per capita, or VMT per employee that exceeded an applicable threshold of significance. LCI recommends that a per capita or per employee VMT that is 15 percent below that of existing development regionally or Citywide may be a reasonable threshold. As CEQA generally defers to lead agencies on the choice of methodology to analyze impacts, the City of Burbank has chosen to use the following as part of a three-pronged threshold:

- The proposed Project would result in average total VMT per service population in the plan horizon year that exceeds 15 percent below the regional average total VMT per service population from the most recent regional metric available.
- The proposed Project would result in average VMT per capita in the plan horizon year that exceeds 15 percent below the regional average VMT per capita from the most recent regional metric available.
- The proposed Project would result in average VMT per employee in the plan horizon year that exceeds 15 percent below the regional average VMT per employee from the most recent regional metric available.

The City has chosen to evaluate all three of these metrics because the program-level goals and policies of the proposed Project would impact many types of travel, including home-based travel, employment-based travel, and non-home/employment travel such as shopping or recreation.

b. Effects Found Not to be Significant

Thresholds 1, 3, and 4, were determined to have a less than significant impact and, therefore, are discussed under Section 4.19, *Effects Found Not to be Significant* and summarized below. Cumulative impacts for Thresholds 1, 3, and 4 are analyzed below in Section 4.15.4, *Cumulative Impacts*.

The proposed Project would establish updated development standards to facilitate the projected development of up to 9,702 residential units, 3,986,207 square feet of commercial and general business development, and 400 hotel rooms in addition to what is already allowed under the current

zoning and land use regulations. Due to the increased demand for transportation infrastructure from future development within the Specific Plan Area, the proposed Specific Plan includes several policies that encourage multi-modal transportation and improve safety features for pedestrians, which are described in Section 4.19, *Effects Found Not to be Significant.* These policies align with the Burbank2035 Mobility Element, which requires the City to improve Burbank's alternative transportation access to local and regional destinations through land use decisions that support multi-modal transportation. Therefore, conflicts with existing policies or ordinances related to the City's circulation system would not be anticipated and impacts would be less than significant.

Development under the proposed Project would be consistent with the existing residential and non-residential land uses, while aiming to achieve the three overarching goals identified by the community which include increased housing production, transit-oriented growth, and contextual development. The proposed Project encourages building designs that are human scaled, provide interest at the ground floor, and provide easy access from the sidewalk to encourage walkability and activate the Specific Plan Area's public realm. Therefore, the proposed Project would not introduce new uses that would result in hazards due to incompatible use. The roadways adjacent to the Specific Plan Area are part of the urban roadway network and contain no sharp curves or dangerous intersections. Nonetheless, the proposed Project would allow for roadway improvements for vehicles and pedestrians, which could introduce hazards and conflicts between pedestrians and vehicles during construction. There are no planned bike lanes within the Specific Plan Area, so conflicts between vehicles and bicyclists would not be anticipated. Therefore, impacts would be less than significant.

The proposed Project would improve connectivity and mobility throughout the Specific Plan Area through implementation of policies and actions, including policies directly or indirectly related to emergency access, which are described in Section 4.19, *Effects Found Not to be Significant.* These policies and the improved connectivity and mobility they would help create would contribute to improving emergency access throughout the Specific Plan Area. In addition, emergency access associated with future development projects would be analyzed and evaluated in detail through the City review process for those individual projects. The City's emergency access standards would apply to all future development projects under the proposed Project. Plans for future development projects under the proposed Project would also be subject to the BFD review for adequate fire access. Therefore, with respect to inadequate emergency access, impacts related to implementation of the proposed Project would be less than significant.

c. Methodology

The VMT analysis is based on the Technical Review of Modeling and VMT Methodology for Media District Specific Plan Traffic Study Report (Traffic Study Report) prepared by Fehr & Peers dated January 14, 2026 (Fehr & Peers 2025; Appendix D). The VMT analysis used the City's travel demand model, which has a 2019 base year and 2035 horizon year in consistence with the Burbank2035 General Plan; however, the VMT analysis uses 2023 as the baseline year because 2023 was the year when the Notices of Preparation was released for the proposed Project. This section and the Traffic Study Report utilize a baseline year of 2023. Refer to the full study provided in Appendix D of this EIR for details regarding the VMT baseline.

The VMT analysis for the proposed Project includes the criteria in Table 4.15-1 as Specific Plan VMT thresholds of significance. These VMT thresholds are consistent with the approach provided in LCI's *Technical Advisory on Evaluating Transportation Impacts in CEQA* (2018) for specific plans. Additionally, each individual VMT threshold relates to those adopted by the City for development projects in its *Transportation Study Guidelines* (2020), although the proposed Project is being

evaluated through a program EIR rather than a project EIR, and these guidelines have not yet been formally updated to reference the City's recently updated travel demand model.

Table 4.15-1 Specific Plan VMT Thresholds of Significance

VMT Type	Significance Threshold
Home-Based Daily VMT per Capita	The Specific Plan Area's home-based VMT per capita must not exceed 15 percent below the baseline citywide average home-based VMT per capita.
Home-Based Work Daily VMT per Employee	The Specific Plan Area's home-based work VMT per employee must not exceed 15 percent below the baseline citywide average home-based work VMT per employee.
Total VMT per Service Population	The Specific Plan Area's total VMT per service population must not exceed 15 percent below the baseline citywide average total VMT per service population.

Source: Appendix D

d. Project Impacts

Threshold 2: Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Impact TRA-1 IMPLEMENTATION OF THE PROPOSED PROJECT WOULD RESULT IN VMT REDUCTIONS FOR ALL THREE TARGET METRICS; HOWEVER, IT WOULD NOT ACHIEVE THE REQUIRED REDUCTION THRESHOLD FOR HOME-BASED WORK VMT PER EMPLOYEE. THEREFORE, THE PROJECT WOULD CONFLICT WITH CEQA GUIDELINES 15064.3(B), AND IMPACTS WOULD BE SIGNIFICANT AND UNAVOIDABLE.

The proposed Project aims to facilitate up to 9,702 residential units, 3,986,207 square feet of commercial and general business development, and up to 400 hotel rooms through a combination of infill, mixed-use development, and transit-oriented growth strategies. These include identifying underutilized parcels as opportunity sites, concentrating development along transit corridors, and improving pedestrian, bicycle, and non-vehicular infrastructure.

To evaluate potential VMT impacts under CEQA Guidelines Section 15064.3(b), the proposed Project was assessed using three performance metrics: (1) home-based VMT per capita, (2) home-based work VMT per employee, and (3) total VMT per service population. Each metric is compared to a threshold requiring a 15-percent reduction below existing (2023) baseline VMT levels.

The VMT modeling provides estimates for the population, employment, and service population in the Specific Plan Area in 2035.[4] Under the proposed Project, the Specific Plan Area population in 2035 is estimated to be 32,985, which is estimated to produce 39,960 daily vehicle trips and 343,134 daily VMT, with an average of 10.4 home-based VMT per capita. The 68,529 future employees under the VMT model in the Specific Plan Area are estimated to attract 81,128 daily vehicle trips and 877,548 daily VMT, with an average of 12.8 home-based work VMT per employee. The total 101,514 service population under the VMT model in the Specific Plan Area is estimated to generate 246,409 daily

[4] As discussed in the Traffic Study Report prepared for the proposed Project (Appendix D), the VMT analysis used the City's travel demand model, which has a 2023 base year and 2035 horizon year. The incremental growth assumptions shown in the VMT analysis can differ from the growth assumptions shown elsewhere in this EIR due to the inclusion of other cumulative growth within the Specific Plan Area.

vehicle trips and 2,129,476 daily VMT, with an average of 21.0 total VMT per service population, as shown in Table 4.15-2.

Table 4.15-2 Proposed Project VMT Summary

Metric	2023 Baseline	2035 Proposed Project	Percent Difference
Total Daily VMT per Service Population	31.0	21.0	-32.2%
Home-Based Daily VMT per Capita	14.7	10.4	-29.3%
Home-Based Work Daily VMT per Employee	13.4	12.8	-4.3%

Source: Appendix D

As summarized in Table 4.15-2, the proposed Project would reduce total VMT per service population by 32.2percent and home-based VMT per capita by 29.3 percent, which both would exceed the required 15-percent reduction threshold. However, it would only reduce home-based work VMT per employee by 4.3 percent, which falls short of the 15-percent target. While the proposed Project promotes infill development, multimodal access, and proximity to existing and future transit infrastructure, all of which are consistent with best practices for VMT reduction, these measures are not sufficient to achieve a significant enough reduction in home-based work VMT per employee. This shortfall likely reflects the regional commuting patterns and land use mix in the Specific Plan Area, where job density outpaces housing development despite efforts to streamline residential production.

As such, the proposed Project would not fully meet CEQA's threshold of significance related to VMT and would, therefore, result in a potentially significant impact.

Mitigation Measures

Potential mitigation measures that would reduce the average total VMT per service population and average VMT per employee are generally project specific mitigation measures such as:

- Provide bicycle parking at employer locations
- Provide parking cash-out programs
- Provide car-sharing, bike sharing, and ride-sharing programs at employer locations
- Provide transit passes to employees
- Improve or increase transit accessibility to employer locations
- Improve pedestrian or bicycle networks, or transit service
- Provide traffic calming features on City roadways

These mitigation measures can be applied at the project specific level but are not feasible at the program level for the proposed Project so they are beyond the scope of the document. Therefore, no feasible mitigation measures have been identified that would reduce the VMT impact to a less-than-significant level.

Significance After Mitigation

Because no feasible mitigation measures have been identified at the program level that would reduce the home-based work VMT per employee impact to a less-than-significant level, the proposed Project's impact related to VMT would be significant and unavoidable.

Determination

Significant and unavoidable impact

4.15.4 Cumulative Impacts

Cumulative transportation impacts consider Citywide growth and development. *CEQA Guidelines* 15130(a) require that the cumulative effect of implementing a project be assessed to determine if the project's incremental effect, when considered together with that of other projects, including growth envisioned by the proposed Project, the Downtown Burbank Transit Oriented Development (TOD) Specific Plan (a consolidation and update of the North San Fernando Boulevard Master Plan and the Burbank Center Plan) and the Golden State Specific Plan (GSSP). As described in Section 3, *Environmental Setting,* the Downtown TOD Specific Plan would facilitate development of up to 9,944 residential units and 6,083,657 square feet of commercial and business development land uses; and the GSSP would facilitate development of up to 7,205 residential units and 3,149,623 square feet of commercial and business development land uses. Cumulative impacts may occur if impacts of the proposed Project combine with similar impacts of other projects in the cumulative scenario.

Consistency with a Circulation Program or Plan

As with the proposed Project, each of the aforementioned Specific Plans would be separately reviewed and approved by the City to ensure their consistency with applicable programs, plans, ordinances, and policies, including, but not limited to, those established in the Burbank2035 Mobility Element. Overall, implementation of the proposed Project, along with the Downtown Burbank TOD Specific Plan and the GSSP, would include policies that would align with the Burbank2035 Mobility Element. Therefore, the proposed Project would not result in cumulatively considerable impacts related to consistency with identified plans and policies addressing the circulation system, and cumulative impacts would be less than significant.

VMT Analysis

As concluded under Impact TRA-1, the proposed Project would result in a significant and unavoidable impact related to home-based work VMT per employee. Accordingly, a finding of significant and unavoidable impact would also result in a significant and unavoidable cumulative impact. Thus, the proposed Project would result in a cumulatively considerable significant and unavoidable impact for cumulative VMT.

Hazards Due to a Geometric Design Feature or Incompatible Uses

As with the proposed Project, each of the aforementioned Specific Plans would be separately reviewed and approved by the City to ensure the project would not introduce hazards due to a geometric design feature or incompatible uses. Overall, implementation of the proposed Project, along with the Downtown Burbank TOD Specific Plan and the GSSP, would not introduce hazards due to geometric design feature or incompatible uses, as each of the Specific Plans would involve development of their respective plan areas with compatible and appropriately located land uses. Therefore, the proposed Project would not result in cumulatively considerable impacts related to hazards due to a geometric design feature or incompatible uses, and cumulative impacts would be less than significant.

Inadequate Emergency Access

As detailed in Section 4.19.13, *Transportation*, the proposed Project would improve connectivity and mobility throughout the Specific Plan Area through implementation of the transportation demand management programs, policies, and strategies that are designed to reduce roadway congestion and enhance mobility for all modes of transportation, including emergency vehicles. Emergency access associated with the Downtown Burbank TOD Specific Plan and the GSSP would be analyzed and evaluated in detail through the City review process for those individual projects. The City's emergency access standards would apply to all future development projects under the proposed Project. Plans for future development projects under the aforementioned Specific Plans would also be subject to the BFD review for adequate fire access. Therefore, with individual project environmental and BFD review, the proposed Project would not result in cumulatively considerable impacts related to inadequate emergency access, and cumulative impacts would be less than significant.

4.16 Tribal Cultural Resources

This section evaluates the potential environmental impacts related to tribal cultural resources associated with implementation of the proposed Project. Specifically, this Section reviews the proposed Project's impacts related to tribal cultural resources that are listed or eligible for listing in the California Register of Historical Resources or a tribal cultural resource determined to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1.

4.16.1 Environmental Setting

The cultural setting for the Burbank Media District Specific Plan Area (hereafter referred to as "Specific Plan Area") is presented broadly in what follows under three overviews: Prehistoric, Ethnographic, and Historic. The Prehistoric and Historic overviews describe human occupation before and after European contact; the Ethnographic Overview provides a synchronic "snapshot" of traditional Native American lifeways as described by European observers prior to assimilative actions.

a. Pre-Contact History

Numerous chronological sequences have been devised to aid in understanding the cultural changes that have occurred throughout the history of Southern California. Building on early studies and focusing on data synthesis, William J. Wallace, a pioneering archaeologist in California who concluded a long tenure in academia as Professor Emeritus of Anthropology at California State University at Long Beach, developed a prehistoric chronology for the Southern California coastal region that is still widely used today and is applicable to near-coastal and many inland areas, including the Specific Plan Area (Wallace 1955, 1978). Four periods are presented in Wallace's prehistoric sequence: Early Man, Milling Stone, Intermediate, and Late Prehistoric. Although Wallace's (1955) synthesis initially lacked chronological precision due to a paucity of absolute dates (Moratto 1984), this situation has been alleviated in recent years by the compilation of thousands of radiocarbon dates obtained by Southern California researchers (Byrd and Raab 2007). Several revisions have been made to Wallace's (1955) synthesis using radiocarbon dates and projectile point assemblages (Koerper and Drover 1983, Mason and Peterson 1994, Koerper et al. 2002).

Early Man Horizon (Circa 10,000 to 6000 BCE)

When Wallace defined the Horizon I (Early Man) period in the mid-1950s, there was little evidence of human presence on the Southern California coast prior to 6000 Before Common Era (BCE). Archaeological work in the intervening years has identified numerous pre-8000 BCE sites, both on the mainland coast and the Channel Islands (Erlandson 1991, Johnson et al. 2002, Moratto 1984, Rick et al. 2001). The earliest accepted dates for occupation in the region are from two of the northern Channel Islands, located off the coast of Santa Barbara. On San Miguel Island, Daisy Cave clearly established the presence of people in this area about 10,000 years ago (Erlandson 1991). On Santa Rosa Island, human remains have been dated from the Arlington Springs site to approximately 13,000 years ago (Johnson et al. 2002).

Recent data from Horizon I sites indicate the economy was a diverse mixture of hunting and gathering, with a major emphasis on aquatic resources in many coastal areas (Jones et al. 2002) and on Pleistocene lakeshores in eastern San Diego County (Moratto 1984). Although few Clovis-like or Folsom-like fluted points have been found in Southern California (Dillon 2002, Erlandson et al. 1987), it is generally thought the emphasis on hunting may have been greater during Horizon I than in later

periods. Common elements in many sites from this period, for example, include leaf-shaped bifacial projectile points and knives, stemmed or shouldered projectile points, scrapers, engraving tools, and crescents (Wallace 1978). Subsistence patterns shifted around 6000 BCE coinciding with the gradual desiccation associated with the onset of the Altithermal climatic regime, a warm and dry period that lasted for about 3,000 years. After 6000 BCE, a greater emphasis was placed on plant foods and small animals.

Millingstone Horizon (6000 to 3000 BCE)

The Milling Stone Horizon of Wallace (1955, 1978) and Encinitas Tradition of Warren (1968) (6000 to 3000 BCE) are characterized by subsistence strategies centered on collecting plant foods and small animals. Food procurement activities included hunting small and large terrestrial mammals, sea mammals, and birds; collecting shellfish and other shore species; near-shore fishing with barbs or gorges; processing of yucca and agave; and using seed and plant products extensively (Kowta 1969). The importance of seed processing is apparent in the dominance of stone grinding implements in contemporary archaeological assemblages, namely milling stones (metates and slabs) and handstones (manos and mullers). Milling stones occurred in large numbers for the first time during this period and were even more numerous near the end of this period. Recent research indicates Milling Stone Horizon food procurement strategies varied in both time and space, reflecting divergent responses to variable coastal and inland environmental conditions (Byrd and Raab 2007).

Milling Stone Horizon sites were common in the Southern California coastal region between Santa Barbara and San Diego and at many inland locations (Couch et al. 2009, Langenwalter and Brock 1985, Sawyer and Brock 2004, True 1958). Wallace (1955, 1978) and Warren (1968) relied on several key coastal sites to characterize the Milling Stone period and Encinitas Tradition, respectively. These include the Oak Grove Complex in the Santa Barbara region, Little Sycamore in southwestern Ventura County, Topanga Canyon in the Santa Monica Mountains, and La Jolla in San Diego County. The well-known Irvine site (CA-ORA-64) has occupation levels dating between circa (ca.) 6000 and 4000 BCE (Macko 1998).

Stone chopping, scraping, and cutting tools made from locally available raw material are abundant in Milling Stone/Encinitas deposits. Less common are projectile points, which are typically large and leaf-shaped, and bone tools, such as awls. Items made from shell, including beads, pendants, and abalone dishes, are generally rare. Evidence of weaving or basketry were present at a few sites. Kowta (1969) attributes the presence of numerous scraper-planes in Milling Stone sites to the preparation of agave or yucca for food or fiber. The mortar and pestle, associated with pounding foods, such as acorns, were first used during the Milling Stone Horizon (Wallace 1955, 1978; Warren 1968).

Cogged stones and discoidals are diagnostic Milling Stone period artifacts, and most specimens have been found at sites dating between 4000 and 1000 BCE (Moratto 1984). The cogged stone is a ground stone object with gear-like teeth on its perimeter. Discoidals are similar to cogged stones, differing primarily in their lack of edge modification. Discoidals are found in the archaeological record after the introduction of the cogged stone. Cogged stones and discoidals are often purposefully buried and are found mainly in sites along the coastal drainages from southern Ventura County southward, with a few specimens inland at Cajon Pass and heavily in Orange County (Dixon 1968, Moratto 1984). These artifacts are often interpreted as ritual objects (Eberhart 1961, Dixon 1968) although alternative interpretations (such as gaming stones) have also been put forward (Sutton 1978).

Characteristic mortuary practices of the Milling Stone period or Encinitas Tradition include extended and loosely flexed burials, some with red ochre which was used as a decorative pigment, and few grave goods, such as shell beads and milling stones interred beneath cobble or milling stone cairns.

"Killed" (i.e., intentionally broken) milling stones, exhibiting holes, may occur in the cairns. Reburials were common in the Los Angeles County area, with north-oriented flexed burials common in Orange and San Diego counties (Wallace 1955, 1978; Warren 1968).

Koerper and Drover (1983) suggest Milling Stone period sites represent evidence of migratory hunters and gatherers who used marine resources in the winter and inland resources for the remainder of the year. Subsequent research indicates greater sedentism than previously recognized. Evidence of wattle-and-daub structures made up of interwoven sticks or branches (wattle) that were sealed using a mixture of soil, clay, animal dung, and straw (daub) and walls have been identified at several sites in the San Joaquin Hills and Newport Coast area (Mason et al. 1991, 1992, 1993; Koerper 1995; Strudwick 2005), while numerous early house pits have been discovered on San Clemente Island (Byrd and Raab 2007:221–222). This architectural evidence and seasonality studies suggest semi-permanent residential base camps were relocated seasonally (de Barros 1996, Koerper et al. 2002, Mason et al. 1997) or permanent villages from which a portion of the population left at certain times of the year to exploit available resources (Cottrell and Del Chario 1981).

Intermediate Horizon (3000 BCE – CE 500)

Following the Milling Stone Horizon, Wallace's Intermediate Horizon and Warren's Campbell Tradition in Santa Barbara, Ventura, and parts of Los Angeles counties, date from approximately 3000 BCE to CE 500 and are characterized by a shift toward a hunting and maritime subsistence strategy, along with a wider use of plant foods. The Campbell Tradition (Warren 1968) incorporates David B. Rogers' (1929) Hunting Culture and related expressions along the Santa Barbara coast. In the San Diego region, the Encinitas Tradition (Warren 1968) and the La Jolla Culture (Rogers 1939, 1945) persist with little change during this time.

During the Intermediate Horizon and Campbell Tradition, there was a pronounced trend toward greater adaptation to regional or local resources. For example, an increasing variety and abundance of fish, land mammal, and sea mammal remains are found in sites along the California coast during this period. Related chipped stone tools suitable for hunting are more abundant and diversified, and shell fishhooks become part of the tool kit during this period. Larger knives, a variety of flake scrapers, and drill-like implements are common during this period. Projectile points include large side-notched, stemmed, and lanceolate or leaf-shaped forms. Koerper and Drover (1983) consider Gypsum Cave and Elko series points, which have a wide distribution in the Great Basin and Mojave deserts between ca. 2000 BCE and CE 500, to be diagnostic of this period. Bone tools, including awls, were more numerous than in the preceding period, and the use of asphaltum adhesive was common.

Mortars and pestles became more common during this period, gradually replacing manos and metates as the dominant milling equipment. Hopper mortars and stone bowls, including steatite vessels, appeared in the tool kit at this time as well. This shift appears to correlate with the diversification in subsistence resources. Many archaeologists believe this change in milling stones signals a shift away from the processing and consuming of hard seed resources to the increasing importance of the acorn (Glassow et al. 1988, True 1993). It has been argued that mortars and pestles may have been used initially to process roots (e.g., tubers, bulbs, and corms associated with marshland plants), with acorn processing beginning at a later point in prehistory (Glassow 1997) and continuing to European contact.

Characteristic mortuary practices during the Intermediate Horizon and Campbell Tradition included fully face-down or face-up flexed burials, oriented toward the north or west (Warren 1968). Red ochre was used commonly as a decorative pigment, and abalone shell dishes were found infrequently. Interments sometimes occurred beneath cairns or broken artifacts. Shell, bone, and stone ornaments,

including charmstones, were more common than in the preceding Encinitas Tradition. Some later sites include Olivella shell and steatite beads, mortars with flat bases and flaring sides, and a few small points. The broad distribution of steatite from the Channel Islands and obsidian from distant inland regions, among other items, attest to the growth of trade, particularly during the latter part of this period. The distribution of Olivella grooved rectangle beads marks "a discrete sphere of trade and interaction between the Mojave Desert and the southern Channel Islands" (Byrd and Raab 2007).

Late Prehistoric Horizon (CE 500 – Historic Contact)

In the Late Prehistoric Horizon (Wallace 1955, 1978), which lasted from the end of the Intermediate Horizon (ca. CE 500) until European contact, there was an increase in the use of plant food resources in addition to an increase in land and sea mammal hunting. There was an associated increase in the diversity and complexity of material culture during the Late Prehistoric, demonstrated by more classes of artifacts. The recovery of a greater number of small, finely worked projectile points, usually stemless with convex or concave bases, suggests an increased usage of the bow and arrow rather than the atlatl (spear thrower) and dart for hunting. Other items include steatite cooking vessels and containers, smaller bone and shell circular fishhooks, perforated stones, arrow shaft straighteners made of steatite, a variety of bone tools, and personal ornaments made from shell, bone, and stone. There is also an increased use of asphalt for waterproofing and as an adhesive.

Many Late Prehistoric sites contained beautiful and complex objects of utility, art, and decoration. Ornaments included drilled whole Venus clam (*Chione spp*.) and drilled abalone (*Haliotis spp*.). Steatite effigies became more common, with scallop (*Pecten spp*. and *Argopecten spp*.) shell rattles common in middens. Mortuary customs were elaborate and included cremation and interment with abundant grave goods. By CE 1000, fired clay smoking pipes and ceramic vessels began to appear at some sites (Meighan 1954). The scarcity of pottery in coastal and near-coastal sites implies ceramic technology was not well-developed in the area or that ceramics were obtained by trade with neighboring groups to the south and east. The lack of widespread pottery manufacture is usually attributed to the high quality of tightly woven and watertight basketry, which functioned in the same capacity as ceramic vessels.

During this period, there was an increase in population size accompanied by the advent of larger, more permanent villages, with some coastal and near-coastal settlements containing as many as 1,500 people (Wallace 1955). Many of the larger settlements were permanent villages in which people resided year-round. The populations of these villages may have also increased seasonally.

In Warren's (1968) cultural ecological scheme, the period between CE 500 and European contact is divided into three regional patterns. The Chumash Tradition is present mainly in the region of Santa Barbara and Ventura counties; the Takic or Numic Tradition is present in the Los Angeles, Orange, and western Riverside counties region; and the Yuman Tradition is present in the San Diego region. The seemingly abrupt changes in material culture, burial practices, and subsistence focus at the beginning of the Late Prehistoric period are thought to be the result of a migration to the coast of peoples from inland desert regions to the east. In addition to the small triangular and triangular side-notched points similar to those found in the desert regions in the Great Basin and Lower Colorado River, Colorado River pottery and the introduction of cremation in the archaeological record are diagnostic of the Yuman Tradition in the San Diego region. This combination suggests a strong influence from the Colorado Desert region.

In Los Angeles, Orange, and western Riverside counties, similar changes (introduction of cremation, pottery, and small triangular arrow points) are thought to be the result of a Takic migration to the coast from inland desert regions. This Takic or Numic Tradition was referred to formerly as the

"Shoshonean wedge" or "Shoshonean intrusion" (Warren 1968). This terminology, used originally to describe a Uto-Aztecan language group, is generally no longer used to avoid confusion with ethnohistoric and modern Shoshonean groups who spoke Numic languages (Heizer 1978, Shipley 1978). Modern Gabrieleño/Tongva in this region are considered the descendants of the prehistoric Uto-Aztecan, Takic-speaking populations who settled along the California coast during this period or perhaps somewhat earlier.

b. Ethnographic Setting

Tongva/Gabrieleño

The City of Burbank (hereafter referred to as "City" or "Burbank") is in the traditional territory of the Tongva/Gabrieleño (also spelled Gabrieliño). The name "Gabrieleño" denotes those who were administered by the Spanish from the San Gabriel Mission. It includes people from the Gabrieleño area proper, as well as other social groups nearby (Kroeber 1925, Bean and Smith 1978). The term Gabrieleño was imposed upon the tribe by Spanish missionaries. Thus, descendants have chosen to use their original name, Tongva (Welch 2006). This term is used in the remainder of this section to refer to the Native American inhabitants of the Los Angeles Basin and their descendants. Archaeological evidence points to the Tongva arriving in the Los Angeles Basin sometime around 500 BCE, and the Tongva note their presence in the area going back thousands of years (Villa 2017). Today, the Tongva people are active in protecting their tribal cultural resources in the greater Los Angeles Basin and three Channel Islands: present-day San Clemente, San Nicolas, and Santa Catalina.

The Tongva language belongs to the Takic branch of the Uto-Aztecan language family, which can be traced to the Great Basin region (Mithun 2001). This language family includes dialects spoken by the nearby Juaneño and Luiseño to the southeast, the Serrano and Cahuilla to the northeast, and the Tataviam to the northwest. Yet, it is considerably different from the Chumash people living to the northwest and the Diegueño people (including the Ipai, Tipai, and Kumeyaay) to the south.

The Tongva established large, permanent villages in the fertile lowlands along rivers and streams and in sheltered areas along the coast. A total tribal population is estimated to have been at least 5,000 in 1770 (Bean and Smith 1978), but recent ethnohistoric work suggests a number closer to 10,000 (O'Neil 2002). Political organization followed a patrilocal and patrilineal pattern. Typically, the oldest son would lead a family. Chieftainship was also passed down patrilineally. A Chari, or chief of a village or political grouping, was separate from religious leadership (King 2011).

At the time of Spanish contact, the basis of Tongva religious life was the Chinigchinich cult, centered on the last of a series of heroic mythological figures. Chinigchinich gave instruction on laws and institutions and taught people how to dance, the primary religious act for this society. He later withdrew into heaven, where he rewarded the faithful and punished those who disobeyed his laws (Kroeber 1925). The Chinigchinich religion seems to have been relatively new when the Spanish arrived. It was spreading south into the Southern Takic groups as Christian missions were being built. Elements of Chinigchinich beliefs suggest it was a syncretic mixture of Christianity and native religious practices (McCawley 1996).

Houses constructed by the Tongva were large, circular, domed structures made of willow poles, thatched with tule and sheltered up to 50 people (Bean and Smith 1978). Other structures served as sweathouses, menstrual huts, ceremonial enclosures, and probable communal granaries. Cleared fields for races and games, such as lacrosse and pole throwing, were created adjacent to Tongva villages (McCawley 1996).

The Tongva subsistence economy was centered on gathering and hunting. The surrounding environment was rich and varied, and the tribe exploited the mountains, foothills, valleys, deserts, including riparian and estuarine areas, as well as open and rocky coastal ecological niches. As with most Native Californians, acorns were the staple food. By the time of the early Intermediate Period, acorn processing was an established industry. Acorns were supplemented by the roots, leaves, seeds, and fruits of a wide variety of flora (e.g., islay, cactus, yucca, sages, and agave). Freshwater and saltwater fish, shellfish, birds, reptiles, insects, and large and small mammals were also consumed (Kroeber 1925, Bean and Smith 1978, McCawley 1996).

The Tongva used a wide variety of tools and implements to gather food resources. These included the bow and arrow, traps, digging sticks, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. The Tongva made oceangoing plank canoes (known as a ti'at) capable of holding six to 14 people and used for fishing, travel, and trade between the mainland and the Channel Islands. Tule reed canoes were employed for near-shore fishing (McCawley 1996). Tongva people processed food with a variety of tools, including hammerstones and anvils, mortars and pestles, manos and metates, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Food was consumed from a variety of vessels. Catalina Island steatite was used to make ollas and cooking vessels (Kroeber 1925, McCawley 1996).

Deceased Tongva were either buried or cremated. Burial was more common on the Channel Islands and the neighboring mainland coast, and cremation was more predominant on the remainder of the coast and in the interior (Harrington 1942, McCawley 1996). At the behest of the Spanish missionaries, cremation essentially ceased between 1769 and 1822 (McCawley 1996).

Today the Gabrieleño/Tongva people continue to inhabit the Los Angeles Basin (Tovangar) and continue to advocate for the preservation and continued practice of their cultural heritage and language. At least five groups tie their ancestral lineage to the Gabrieleño/Tongva people: the Gabrieleño Band of Mission Indians - Kizh Nation, the Gabrieleno/Tongva San Gabriel Band of Mission Indians, the Gabrielino/Tongva Nation of the Greater Los Angeles Basin, the Gabrielino-Tongva Tribe, and the Gabrielino Tongva Indians of California Tribal Council.

Fernandeño

Burbank also lies in the traditional territory of the people who became known as the Fernandeño Historical Indian Tribe. The City is near the ancestral villages of Jajamonga and Kawénga (Fernandeño Tataviam Band of Mission Indians [FTBMI] 2024). The Tataviam are one regional group of many that were enslaved at Mission San Fernando. John P. Harrington was a primary source ethnographer, who conducted interviews with Tataviam descendants in the early 20th century (Johnson and Earle 1990). Today, researchers generally agree the Tataviam spoke an Uto-Aztecan language, most likely a Takic language (Hudson 1982). In 1990, the language was thought to be lost (Johnson and Earle 1990) but is now being revitalized through the FTBMI's education program.

Tataviam territory included the upper Santa Clara River from Piru Creek eastward, extending over the Sawmill Mountains to the southwest edge of the Antelope Valley (King and Blackburn 1978). A more recent reanalysis of ethnographic information and mission register data found that Tataviam territory likely extended farther south to include a portion of western San Fernando Valley (NEA and King 2004). Their territory was bounded on the west by the present-day Ventureño, to the east by the present-day Serrano, to the north by the present-day Tejon Indian Tribe, and to the south by the present-day Gabrielino. Many citizens of the FTBMI identify as Fernandeño. The tribe is comprised of lineal descendants of progenitors enslaved at Mission San Fernando Rey. The citizens of the tribe are descended from ancestors recruited to Mission San Fernando. The Fernandeño Historical Indian Tribe

became known as the FTBMI, which is composed of three lineages: Ortega, Garcia, and Ortiz. The Ortiz lineage descends directly from the Kawébit lineage through their ancestor María Encarnación, who was born into the lineage at Kawénga in 1783. Her son, Jose Miguel Triunfo, was born in 1814 and managed the Kawénga ranch in the 1840s. In 1843, Triunfo received a 388-acre land grant from Governor Micheltoreña entitled Rancho Cahuenga located within the Rancho Providencia land grant. He later traded this land with Rancho Tujunga upon rumors of an impending war. Jose Miguel Triunfo's descendants account for five percent of the FTBMI today (Goldberg and Champagne 2021).

Before colonization, Tataviam dwellings were domed-thatch shelters under shady overhanging rocks that aided in cooling (Eargle 2008). Settlement size ranged from 10 to 200 persons, with small settlements often ancillary to large villages. Archaeological evidence from Bower's Cave—located between Newhall and Piru—combined with ethnographic evidence suggest their ritual organization was similar to both the Ventureño and Gabrieleño. Rock art found in their traditional territory included representational and abstract pictographs, incised pictographs, petroglyphs, and cupules (Knight 2010).

The Tataviam were a hunting and gathering society. Acorns were a main food source and were ground into flour (Eargle 2008; Garza 2012). King and Blackburn (1978) hypothesize that because of the predominance of large south-facing slopes in their territory, the Tataviam relied on yucca as a food source more than their neighbors (Garza 2012). Additional food resources included sage seeds, berries, small mammals, deer, and possibly antelope.

Exogamous marriage was commonly practiced and Tataviam intermarried with other villages (King and Blackburn 1978). Genealogical research suggests that Tataviam individuals and families persisted into the 20th century in other communities (Johnson and Earle 1990), which is further documented by the FTBMI. Spanish missions developed in the area relatively early, with records of Tataviam baptisms as early as 1803. By 1810, nearly all of the Tataviam had been removed to the Mission San Fernando and baptized (King and Blackburn 1978, Johnson and Earle 1990).

c. Post-Contact Setting

Post-Contact history for the state of California is generally divided into three periods: the Spanish Period (1769–1822), Mexican Period (1822–1848), and American Period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish Period in California began with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marked the beginning of the Mexican Period, and the signing of the Treaty of Guadalupe Hidalgo in 1848 ended the Mexican-American War, which signaled the beginning of the American Period when California became a territory of the United States.

Spanish Period (1769 – 1822)

Spanish explorers made sailing expeditions along the coast of California between the mid-1500s and mid-1700s. Juan Rodriguez Cabrillo in 1542 led the first European expedition to observe what was known by the Spanish as Alta (upper) California. For more than 200 years, Cabrillo and other Spanish, Portuguese, British, and Russian explorers sailed the Alta California coast and made limited inland expeditions, but they did not establish permanent settlements (Bean 1968, Rolle 2003). The Spanish crown laid claim to Alta California based on the surveys conducted by Cabrillo and Vizcaíno (Bancroft 1885, Gumprecht 1999).

By the 18th century, Spain developed a three-pronged approach to secure its hold on the territory and counter against other foreign explorers. The Spanish established military forts, known as presidios, as well as missions and pueblos (towns) throughout Alta California. The 1769 overland expedition by Captain Gaspár de Portolá marked the beginning of California's historic period, occurring just after the King of Spain installed the Franciscan Order to direct religious and colonization matters in assigned territories of the Americas. Portolá established the Presidio of San Diego as the first Spanish settlement in Alta California in 1769. Franciscan Father Junípero Serra also founded Mission San Diego de Alcalá that same year, the first of the 21 missions that would be established in Alta California by the Spanish and the Franciscan Order between 1769 and 1823 (Graffy 2010). The nearest missions to what is now Burbank were San Gabriel Arcangel and San Fernando Rey de Espana and, founded in 1771 and 1797, respectively.

The mission and presidio relied on Tongva and Tataviam labor; eventually, the majority of the native populations were forced to live within the mission complex. During the Spanish Period, construction of missions and associated presidios was a major emphasis with the goal of integrating the Native American population into Christianity and communal enterprise. Incentives were also provided to draw settlers to pueblos or towns. Three pueblos were established during the Spanish Period, only two of which, San José and Los Angeles, were successful and remain as California cities (Library of Congress 2024a, 2024b, Galvin Preservation Associates [GPA] 2009)).

Spain began making land grants in 1784, typically to retiring soldiers, although the grantees were only permitted to inhabit and work the land. The land titles technically remained property of the Spanish king (Livingston 1914). In 1814, the Crown conveyed 36,000 acres of historically Tongva lands, including areas now comprising Burbank, to Corporal José Maria Verdugo as Rancho San Rafael. Verdugo raised horses, cattle, sheep, and mules, in addition to a variety of crops, on the land (GPA 2009).

Mexican Period (1822 – 1848)

Up to this period, several factors kept growth within Alta California to a minimum, including the threat of foreign invasion, political dissatisfaction, and unrest among the indigenous population. After more than a decade of intermittent rebellion and warfare, New Spain won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants (Orsi and Gutierrez 1998).

Extensive land grants were established in the interior during the Mexican Period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts. The secularization of the missions following Mexico's independence from Spain resulted in the subdivision of former mission lands and establishment of many additional ranchos. Commonly, former soldiers and well-connected Mexican families were the recipients of these land grants, which now included the title to the land (Graffy 2010). In 1843, the Mexican government granted a 4,600-acre tract of land immediately southwest of Rancho San Rafael to Comandante General Jose Castro. Named Rancho La Provedencia, Castro's holdings included a sizeable portion of what is now Burbank (GPA 2009).

During the supremacy of the ranchos (1834–1848), landowners largely focused on the cattle industry and devoted large tracts to grazing. Cattle hides became a primary Southern California export, providing a commodity to trade for goods from the east and other areas in the United States and Mexico. The number of nonnative inhabitants increased during this period because of the influx of explorers, trappers, and ranchers associated with the land grants. The rising California population

contributed to the introduction and rise of diseases foreign to the Native American population, who had no associated immunities (Graffy 2010).

American Period (1848 – Present)

The United States went to war with Mexico in 1846. During the first year of the war, John C. Fremont traveled from Monterey to Los Angeles with reinforcements for Commodore Stockton and evaded Californian soldiers at Santa Barbara's Gaviota Pass by taking the route over the San Marcos grade instead (Kyle 2002). The war ended in 1848 with the Treaty of Guadalupe Hidalgo, ushering California into its American Period.

California officially became a state with the Compromise of 1850, which also created Utah and New Mexico (with present-day Arizona) as United States territories (Waugh 2003). Horticulture and livestock, based primarily on cattle as the currency and staple of the rancho system, continued to dominate the Southern California economy through 1850s. The discovery of gold in the northern part of the state led to the Gold Rush beginning in 1848, and with the influx of people seeking gold, cattle were no longer desired mainly for their hides but also as a source of meat and other goods. During the 1850s cattle boom, rancho vaqueros, or cowboys, drove large herds from southern to northern California to feed that region's burgeoning mining and commercial boom.

A severe drought in the 1860s decimated cattle herds and drastically affected rancheros' source of income. In addition, property boundaries that were loosely established during the Mexican era led to disputes with new incoming settlers, problems with squatters, and lawsuits. Rancheros often were encumbered by debt and the cost of legal fees to defend their property. As a result, much of the rancho lands were sold or otherwise acquired by Americans. Most of these ranchos were subdivided into agricultural parcels or towns (Dumke 1944).

d. Local History

The City of Burbank was developed on land that had once been part of the holdings of Dr. David Burbank, a dentist who arrived in Southern California in 1866. Burbank acquired 9,200 acres of land, including Rancho La Providencia and a portion of Rancho San Rafael, in 1866. He later sold a right-of-way through his property to the Southern Pacific Railroad, which constructed a new rail line that served to connect new communities to Los Angeles. In 1886, at the dawn of a regional real estate boom, Burbank became one of 10 directors of the Providencia Land, Water and Development Company (PLWC), a company founded to handle the subdivision and sale of his land. As new settlers flocked to Southern California, Burbank's land was surveyed, platted, and formally named Burbank around this time. Early development in the town included hotels, a train depot, a school, and residential and manufacturing buildings. PLWC began to sell tracts of land in late 1887, and buyers were primarily farmers who grew vineyards, peaches, melons, alfalfa and various other types of vegetables. A period of drought followed; the real estate bubble burst and an economic depression occurred between 1888 and 1911 (GPA 2009).

By 1910, Burbank's population had reached 12,225 people, with approximately 700 to 800 people living within its core. The City of Burbank was formally incorporated the following year and proceeded to expand in all directions. During the 1910s and 1920s the City's commercial core strengthened, residential development increased, industry grew, and additional infrastructure was developed. As the City's population increased, land was annexed into the City, and farmland was converted to residential tracts. Film companies that had started moving to the West Coast because of the favorable weather had begun establishing studios in Los Angeles County by the late 1910s. Having large areas

of undeveloped land, Burbank became a prime location for these companies, including First National Pictures (a predecessor to Warner Bros.), which developed a studio in Burbank in 1926 (GPA 2009).

Although residential development in the area faltered during the Great Depression, the 1930s saw the development of an airport, the United Air Terminal, and continued success of the movie studios in Burbank. Columbia Ranch studio was established in 1934, Warner Bros. expanded, and Disney Studios established their facility in 1938, all of which are located in the Specific Plan Area. Building construction increased by the late 1930s during a period of economic recovery. Numerous residences were constructed, a segment of the Hollywood Freeway was completed, and populations increased. By 1940, the City had over 34,000 residents. World War II brought a surge in production at companies, such as Lockheed. During this period, several small aircraft-related manufacturing facilities were developed near the airport, east of Hollywood Way and north of Empire Avenue. These were typically single-story corrugated metal buildings with gabled roofs. The City also experienced a large population spike, growing to 53,899 residents by August 1942. Resultingly, residential, commercial, and institutional development also increased to support these expanded populations (GPA 2009).

Burbank experienced tremendous growth following World War II, including housing, schools, public buildings, and freeways. Studios focused on television production, and air travel grew in popularity. In 1962, the National Broadcasting Company (NBC) moved its network television headquarters to the City. In line with regional trends, the Post-World War II-era boom led to decentralization of the population, negatively affecting the downtown commercial district. A lull in development occurred in the late 1960s to early 1970s, but, in 1978, the Burbank-Glendale-Pasadena Airport (now Hollywood Burbank Airport) was purchased from Lockheed. In 1990, Lockheed closed its Burbank plant (GPA 2009). Today, the City is known as the "Media Capital of the World" in reference to its longstanding relationships with entertainment companies, such as Warner Bros. and Disney (City of Burbank 2017).

e. Development History of the Specific Plan Area

A review of historical topographical maps, historical aerial photographs, and assessor data was completed to characterize developmental patterns within the Specific Plan Area. Generally, the Specific Plan Area experienced limited agricultural development by the late 19th century, saw the beginnings of mass housing construction by the late 1920s, and was subject to intensive urbanization between the 1940s and 1950s. Much development followed the establishment of industry in the Specific Plan Area in the 20th century, specifically major motion picture studios. Although development of the Specific Plan Area began by the 1890s, assessor parcel data shows there are few existing properties in the area constructed prior to the 1930s.

The earliest United States Geological Survey (USGS) map of the Specific Plan Area, dated 1894, shows the Specific Plan Area was a primarily agricultural zone then on the outskirts of the Burbank proper. It depicts sparse development scattered along a road network that includes many of the thoroughfares in the area. However, buildings depicted on the map are far more numerous north of the West Olive Avenue and West Alameda Avenue intersection than they are to the south (USGS 1894). The earliest available aerial photographs of the area show the pattern of relatively sparse agricultural development maintained into the late 1920s though several clusters of non-farm single-family residences were also present (UCSB 1927a, 1927b, 1928).

Historical aerial photographs and assessor construction data indicate that residential and commercial development intensified in the Specific Plan Area in the 1940s and 1950s, contributing to Burbank's wider growth in the World War II and early Post-World War II eras. By 1944, west of North Hollywood Way within the Specific Plan Area, development was densest, consisting largely of residential neighborhoods situated near the Warner Bros. Ranch and Warner Bros. Studios lots. Commercial

development was evident as well although the frontages of major commercial arteries, such as West Olive Avenue, West Alameda Avenue, Riverside Drive, remained largely vacant at the time. Outside Disney Studios, the east side of the Specific Plan Area remained comparatively undeveloped, with evidence of vacant parcels and small farms (UCSB 1944a, 1944b, 1944c). Over the following eight years, development continued such that few sizable undeveloped tracts remained within the Specific Plan Area. Development was characterized mostly by single-family residences and small- to moderate-sized commercial properties. The notable exception was the area southeast of the West Olive Avenue and West Alameda Avenue intersection, where the Burbank Studios and Johnny Carson Park are now located. Development of Burbank Studios was underway by 1954. A large portion of the existing properties in the Specific Plan Area date to the 1940s and 1950s (NETR Online 2024).

In the 1960s and early 1970s, all but a few remaining vacant lots in the Specific Plan Area were gradually developed. The most notable change to the Specific Plan Area in these years was the development of State Route 134 (SR-134), which traverses the Specific Plan Area on a roughly east-west alignment. The development of commercial office nodes along SR-134 and West Alameda Avenue began by the mid-1980s, a trend that has continued to the present. Elsewhere, however, development patterns have remained relatively consistent since the mid-20th century, outside the expansion of some studio facilities and piecemeal redevelopment of smaller properties throughout the Specific Plan Area (NETR Online 2024).

4.16.2 Regulatory Setting

a. State Regulations

Assembly Bill 52

California Assembly Bill 52 of 2014 (AB 52) was enacted to expand CEQA by defining a new resource category, "tribal cultural resources." AB 52 establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). PRC Section 20184.3 (b) provides examples of mitigation measures that lead agencies may consider to avoid or minimize impacts to tribal cultural resources.

PRC Sections 21074(a) defines tribal cultural resources as either of the following:

"(1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

(2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe."

AB 52 also establishes a formal consultation process for California Native American tribes regarding those resources. The formal consultation process must begin before a CEQA document can be released if a California Native American tribe traditionally and culturally affiliated with the geographic area of the proposed Project requests consultation from the lead agency (PRC Section 21080.3.1). California Native American tribes to be included in the process are those that have requested to the lead agency notice of any proposed projects within the geographic area that is traditionally and culturally affiliated with the tribe, and who request the consultation within 30 days of receipt of formal notification.

Senate Bill 18

Senate Bill 18 of 2004 (SB 18) (California Government Code Section 65352.3 and 65352.4) requires cities and counties to notify and consult with California Native American tribal groups and individuals regarding proposed local land use planning decisions for the purpose of protecting traditional tribal cultural places (sacred sites), features, and objects, prior to adopting or amending a general plan or designating land as open space. Tribal groups or individuals have 90 days to request consultation following the initial contact.

Senate Bill 35 and Assembly Bill 168

Enacted on September 29, 2017, Senate Bill 35 (SB 35) (California Government Code Section 65913.4) grants a ministerial approval process that expedites and facilitates construction of affordable housing projects without normal CEQA documentation. However, in 2020 Assembly Bill 168 (AB 168) was passed and requires a pre-consultation process with Native American tribes to identify and protect tribal cultural resources prior to the submission of a formal SB 35 application for a housing development project.

b. Local Regulations

Burbank2035 General Plan

The Burbank 2035 General Plan, adopted in 2013, includes goals, polices, and programs relating to cultural resources (City of Burbank 2013).

The Burbank2035 General Plan Land Open Space and Conservation Element provides the following goal and policies:

- **Open Space and Conservation Policy 6.1**: Recognize and maintain cultural, historical, archeological, and paleontological structures and sites essential for community life and identity.
- The Burbank2035 General Plan provides the following program for implementation of goals and polices pertaining to the preservation of historical resources:
- **Program LU-4**: **Historic Preservation Plan**–To reduce impacts to both known and as-yet-unknown historical resources within Burbank, the City shall:
  - Review, revise, and maintain the Historic Preservation Plan to ensure that it is informed by current resource data and its goals and policies are consistent with the Land Use Element.
  - Establish a list of Eligible Historic Resources to be maintained by the Community Development Director. Update the list of Eligible Historic Resources every five (5) years to identify as-yet unknown historical resources (as defined in State CEQA Guidelines Section 15064.5) as potential resources are identified through citywide surveys and on a project-by-project basis.

- Periodically review and revise the Historic Resources Management Ordinance and preservation incentives to account for new resources as they are identified.
- Require evaluation by a qualified architectural historian for projects subject to CEQA involving buildings constructed more than 45 years prior to the project application. If the evaluation determines that historical resources (as defined in State CEQA Guidelines Section 15064.5) would be adversely affected, the City shall require the proposed project to comply with Section 10-1-928 of the Historic Resource Management Ordinance.
- Require assessment by a qualified archeologist for projects subject to CEQA involving ground-disturbing activities on previously undisturbed land to identify the potential to encounter buried historical resources (as defined in State CEQA Guidelines Section 15064.5). If the assessment determines that buried resources may be present, the City shall require preparation and implementation of a treatment plan outlining measures for monitoring, data recovery, and/or handling inadvertent discoveries.

4.16.3 Impact Analysis

a. Thresholds of Significance

For purposes of this environmental analysis, thresholds of significance are based on the questions in Appendix G of the *CEQA Guidelines*, which states that impacts related to tribal cultural resources would be potentially significant if implementation of the proposed Project would do any of the following:

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

b. Methodology

As part of its tribal cultural resource identification process under AB 52 and SB 18, the City of Burbank requested a review of the NAHC's Sacred Lands File (SLF) in relation to the Specific Plan Area and received a response on December 26, 2023, stating the search of the SLF was positive. The NAHC also provided a list with the contact information for seven local Native American tribes and specified that the City could contact the Fernandeño Tataviam Band of Mission Indians (FTBMI) for more information related to the positive SLF result. On January 17, 2024, the City sent letters via certified mail to the seven Native American tribes included on the NAHC's contact list.

As part of the AB 52 and SB 18 consultation process, the City received a response from the Gabrieleño Band of Mission Indians – Kizh Nation on January 19, 2024, requesting to schedule a consultation meeting to discuss the Project and the surrounding location in further detail. Representatives from the City and the Kizh Nation met on May 1, 2025. Following the meeting, the Kizh Nation provided two documents: an overview of the indigenous history of the Burbank area and suggested mitigation

for use in this document. On May 2, 2025, the Tribe responded back to City staff with draft mitigation measures for consideration. On December 11, 2025, the City sent a summary of the information as it pertained to the Specific Plan Area, including the draft mitigation measures and provided the estimated timeline for public review of the Draft Program EIR. No further response was received from the Tribe.

The City also received a response from the FTBMI on February 6 and 7, 2024, which sought confirmation that there is currently no specific planned project related ground disturbance (the City confirmed there is not) and provided suggested mitigation language for use in this document, respectively. On December 11, 2025, the City sent a summary of the information as it pertained to the Specific Plan Area, including the draft mitigation measures and provided the estimated timeline for public review of the Draft Program EIR. On December 15, 2025, the City received a response from the FTBMI requesting a minor revision to a mitigation measure.

AB 52 and SB 18 consultation have not identified tribal cultural resources in the Specific Plan Area as part of this analysis.

c. Project Impacts

Threshold 1: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Impact TCR-1 Future development projects accommodated by the proposed Project could adversely impact tribal cultural resources. Impacts would be less than significant with implementation of mitigation and through consultation conducted pursuant to the requirements of AB 52 and SB 18.

Ground-disturbing activities associated with future development projects under the proposed Project could expose unknown subsurface archaeological resources that may qualify as tribal cultural resources and could be adversely affected by the construction of the future development project. Given the highly developed nature of the Specific Plan Area, the likelihood of encountering intact tribal cultural resources is low to moderate.

AB 52/SB 18 consultation carried out as part of this analysis has not identified known tribal cultural resources in the project area. Nonetheless, ground-disturbing activities associated with individual development projects facilitated by the proposed project could expose previously unidentified subsurface archaeological resources that may qualify as tribal cultural resources and could be adversely affected by construction.

Adherence to the requirements of AB 52 and if applicable SB 18 would require Tribal consultation with local California Native American Tribes prior to implementation of project activities subject to CEQA or SB 35, respectively. In compliance with AB 52, a determination of whether project-specific substantial adverse effects on tribal cultural resources would occur along with identification of appropriate project-specific avoidance, minimization, or mitigation measures would be required. Although no tribal cultural resources were identified during consultation for the Specific Plan, due to the programmatic nature of the proposed project it is not possible to fully determine impacts of specific projects on specific future development sites. Effects on tribal cultural resources can only be known once a specific project has been proposed, because the effects are dependent on both the individual project site conditions and the characteristics of the proposed activity.

Mitigation Measures

TCR-1 Native American Monitoring

If it is determined under Mitigation Measure CUL-2 that Native American monitoring is required, Mitigation Measures TCR-1 shall be used as to guide for monitoring. Prior to initiation of any future development project under the proposed Project, a Native American monitor from one of the consulting tribes for the Specific Plan Area shall be retained.

In general, Native American monitoring shall be limited to initial ground disturbance that is defined as construction-related earthmoving of sediments from their native place of deposition, which includes, but is not limited to, tree/shrub removal and planting, clearing/grubbing, grading, leveling, excavation, trenching, compaction, plowing, fence/gate removal and installation, drainage and irrigation removal and installation, hardscape installation [boulders, walls, etc.], and archaeological work. Initial ground disturbance does not include any secondary movement of sediment that might be required for a project (e.g., backfilling). If more than one consulting tribe wish to be present for monitoring, they shall be present on a rotating basis. The Native American monitor(s) shall have the authority to halt and redirect work should any potential cultural resources be identified during monitoring. If potential tribal cultural resources are encountered during ground-disturbing activities, work within 50 feet of the find shall be halted, and the find shall be evaluated for listing in the CRHR. Native American monitoring may be reduced or be halted at the discretion of the City, in consultation with the tribes consulting on the specific future development project, as warranted by conditions, such as encountering bedrock, sediments being excavated are fill, or negative findings during the first 50 percent of ground disturbance. If monitoring is reduced to spot-checking, spot-checking shall occur when ground disturbance moves to a new location within the site of the future development project and/or when ground disturbance extends to depths not previously reached (unless those depths are within bedrock).

Significance After Mitigation

Implementation of Mitigation Measure TCR-1 would apply to future development projects under the proposed Project requiring ground disturbance to native soils, which would reduce impacts to tribal cultural resources to a less than significant level. Implementation of Mitigation Measures CUL-2a and CUL-2b would also contribute to reducing potential impacts to tribal cultural resources.

Furthermore, implementation of Mitigation Measures CUL-2a through CUL-2c and TCR-1 would be site-specific and would only apply to resources found on a project site; therefore, it is not anticipated that any secondary environmental impacts associated with these measures would occur.

Determination

Less than significant with mitigation incorporated

4.16.4 Cumulative Impacts

The geographic extent of cumulative analysis for tribal cultural resources is the City of Burbank, particularly areas of anticipated development under the Downtown Transit Oriented Development (TOD) Specific Plan (a consolidation and update of the North San Fernando Boulevard Master Plan and the Burbank Center Plan), the Golden State Specific Plan, and the Burbank Rancho Neighborhood Specific Plan, as described in Section 3, *Environmental Setting*. As described in Section 3, *Environmental Setting,* the Downtown TOD Specific Plan would facilitate development of up to 9,944 residential units and 6,083,657 square feet of commercial and business development land uses; and the GSSP would facilitate development of up to 7,205 residential units and 3,149,623 square feet of commercial and business development land uses. Cumulative impacts may occur if impacts of the proposed Project combine with similar impacts of other projects in the cumulative scenario.

Future development projects under the proposed Project, the Downtown TOD Specific Plan, and the GSSP could cause a substantial adverse change in the significance of a tribal cultural resource. The nature and magnitude of such impacts would depend on the nature and location of individual future developments under the aforementioned Specific Plans so it would be speculative to try to predict the specific level of cumulative impact that may occur as the City continues to develop. Nevertheless, it is conservatively projected that Citywide development could result in a substantial adverse change in the significance of a tribal cultural resource, with potentially significant cumulative impacts.

Cumulative development under the proposed Project, the Downtown TOD Specific Plan, and the GSSP could potentially disturb areas that may contain tribal cultural resources. While there is the potential for significant cumulative impacts to tribal cultural resources, it is anticipated that potential impacts associated with cumulative development would be addressed on a case-by-case basis and would be subject to City policies and local and State regulations regarding the protection of such resources. It is anticipated that cumulative impacts to historical resources can be avoided or minimized through implementation of Mitigation Measures TCR-1, CUL-2a, and CUL-2b on a project-by-project basis. Therefore, the incremental effect of the proposed Project related to tribal cultural resources would not be cumulatively considerable and cumulative impacts would be less than significant.

4.17 Utilities/Service Systems

This section evaluates the potential environmental impacts related to utilities and service systems associated with the proposed Project. Specifically, this section reviews the proposed Project's impacts related to infrastructure for water supply; wastewater conveyance, treatment, and disposal; solid waste disposal; stormwater management; and facilities for telecommunications, electricity, and natural gas. Other thresholds of significance associated with compliance with federal, State, and local solid waste statutes and regulations are discussed in Section 4.19, *Effects Found Not to be Significant*; therefore, this issue are not studied further herein.

4.17.1 Environmental Setting

a. Water Supply

Burbank Power and Water (BWP) provides domestic and potable water service in Burbank. The City of Burbank's (hereafter referred to as "City" or "Burbank") water comes from two sources: water purchased from Metropolitan Water District of Southern California (Metropolitan), a regional wholesaler and State Water Project (SWP) contractor; and local groundwater from the San Fernando Valley Groundwater Basin (San Fernando Basin). BWP also uses recycled water to meet some of its water needs, such as outdoor irrigation and power plant cooling.

Water purchased from Metropolitan is imported from the Colorado River Aqueduct and the SWP. Metropolitan, which provides treated and untreated water directly to its 26 member agencies, is a regional wholesaler with no retail customers. Member agencies include 14 cities, 11 municipal water districts, and one county water authority (Metropolitan 2025). Each of Metropolitan's qualifying member agencies, including BWP, is responsible for implementing its own Urban Water Management Plan (UWMP); see further discussion of UWMPs in Section 4.17.2(a).

BWP's 2020 UWMP, adopted in June 2021, includes an assessment of past and future water supplies and demands, evaluation of the future reliability of the region's water supplies over a 20-year planning horizon, discussion of demand management measures and Burbank's water shortage contingency plan, discussion of the use and planned use of recycled water, and an evaluation of distribution system water losses (BWP 2021). As with Metropolitan, BWP also maintains a UWMP that forecasts future water demands in Burbank under average and dry year conditions, identifies future water supply projects, and evaluates future supply reliability. The UWMP discusses the provider's supply portfolio, including current and planned water conservation and recycling activities (BWP 2021).

BWP does not have ownership rights to the naturally occurring groundwater underneath the City, but BWP does have rights to pump groundwater through groundwater credits. Groundwater provided by BWP is managed in accordance with the Upper Los Angeles River Adjudication Judgment, administered by the Upper Los Angeles River Area Watermaster as the Watermaster. The adjudication judgment limits production from the San Fernando Basin to ensure the long-term reliability of the basin.

The Burbank Water Reclamation Plant (BWRP) produces a disinfected tertiary effluent that is approved for all uses, including full body contact, with the exception of human consumption. The BWRP produces up to 10,000 acre-feet per year (AFY) of recycled water, which is available for reuse in any of the following three ways:

- Flowed via gravity pipeline to the BWP campus
- Pumped into the recycled water distribution system
- Discharged to the Burbank Western Channel adjacent to the BWRP

Recycled water produced at the BWRP is used for power production, landscape irrigation, and evaporative cooling (BWP 2021).

b. Wastewater

Wastewater generated in Burbank is collected and conveyed through approximately 230 miles of underground pipelines, ranging in diameter from six inches to 30 inches. The City's wastewater conveyance system also includes two pump stations and 19 diversion manholes. In addition, the Los Angeles 48-inch North Outfall Sewer (NOS) line runs from west to east along the Los Angeles River in the southern portion of the Burbank Media District Specific Plan Area (hereafter referred to as "Specific Plan Area"). A small number of flows go directly to the NOS.

According to the Focused Sewer Capacity Analysis prepared for the proposed Project by the City of Burbank Public Works Department in September 2025, wastewater flows to the BWRP which currently has limited remaining capacity with the ability to treat sewer inflows at an average rate of approximately 8.5 million gallons per day (MGD) (Appendix H). The disinfected tertiary effluent produced by the BWRP is discharged to either the Los Angeles County Flood Control District's (LACFCD) Burbank Western Channel or to the City's recycled water distribution system for non-potable use. The discharged tertiary effluent meets discharge limitations identified in the City's National Pollutant Discharge Elimination System (NPDES) permit issued by the Los Angeles Regional Water Quality Control Board (RWQCB). The BWRP's effluent also meets the most stringent water quality criteria for recycled water, as defined in the California Code of Regulations (CCR), Title 22, Division 4, Chapter 3 requirement as Disinfected Tertiary Recycled Water. Public Works is responsible for maintaining, replacing, and upgrading the City's sewer collection system.

c. Stormwater

Public Works oversees stormwater management throughout the City. In 2012, the Los Angeles RWQCB adopted the *Final Waste Discharge Requirements for Municipal Separate Storm Sewer System* (MS4) *Discharges within the Coastal Watersheds of Los Angeles County*. Burbank is a co-permittee in fulfilling the requirements of the municipal storm water permit, which regulates discharges of stormwater and urban runoff from storm drain systems. Furthermore, the City has an established Storm Water Quality Management Program that educates existing and future efforts relating to stormwater management across the City. The City's existing stormwater pipeline system is comprised of 42-inch-wide reinforced concrete pipe (RCP) that collects stormwater runoff from throughout the City and ultimately discharges it into the Burbank Western Channel and the Pacific Ocean.

d. Solid Waste

The Street and Solid Waste Division of Public Works is responsible for the collection of solid waste, green waste, organics, recyclables, and bulky items in the City. City solid waste collection crews service all single-family residences, 50 percent of multifamily residences, and approximately 10 percent of the City's commercial/industrial refuse customers (City of Burbank 2025). Businesses and larger multifamily residences can use City solid waste and recycling services or hire a private waste collection and hauling company. Solid waste generated within the City, including the Specific Plan Area is primarily disposed at Burbank Landfill Site No. 3, Sunshine Canyon Landfill, Simi Valley Landfill

& Recycling Center, and Antelope Valley Public Landfill (California Department of Resources Recycling and Recovery [CalRecycle] 2025b). As of 2019, solid waste in Burbank was primarily disposed of at Chiquita Canyon Sanitary Landfill in Castaic. However, on January 1, 2025, Chiquita Canyon Sanitary Landfill is closed for the acceptance of solid waste due to regulatory compliance incidents related to elevated temperatures at the landfill (CalRecycle 2025b; Appendix I).

The City owns and operates Burbank Landfill Site No. 3, located in the Verdugo Hills at the eastern edge of Burbank. The landfill has a maximum permitted capacity of 5,933,365 cubic yards (cy) and a remaining capacity of 4,525,788 cy (approximately 76 percent of the maximum permitted capacity) (CalRecycle 2025a). The maximum permitted intake is 240 tons per operating day. Burbank Landfill Site No. 3 has an expected closure year of 2116 (Appendix I). Solid waste received and processed at Burbank Landfill Site No. 3 comes from residential and commercial properties serviced by the City, including the Specific Plan Area. Organics are transported to Burbank Landfill Site No. 3 and then transferred onto semi-trucks for transportation to a composting site in California's Central Valley.

The City also owns the Burbank Recycle Center, which houses a materials recovery facility and buyback/drop off center, as well as a used oil center, composting information, and a learning center. The Burbank Recycle Center is a private/public partnership with Burrtec that collects and diverts wastes that contribute to the Burbank Landfill capacity (City of Burbank 2013).

Sunshine Canyon Landfill located in Sylmar, has a maximum permitted capacity of 140,900,000 cy and a remaining capacity of 66,200,000 cy (approximately 47 percent of the maximum permitted capacity (CalRecycle 2025a). The maximum permitted intake is 12,100 tons per day. Sunshine Canyon Landfill has an expected closure date of 2037. Solid waste received and processed at Sunshine Canyon Landfill comes from multi-family residential and commercial properties serviced by the City, including the Specific Plan Area.

Simi Valley Landfill & Recycling Center located in Simi Valley, has a maximum permitted capacity of 119,600,000 cy and a remaining capacity of 79,783,835 cy (approximately 67 percent of the maximum permitted capacity (CalRecycle 2025a). The maximum permitted intake is 64,750 tons per day. Simi Valley Landfill & Recycling Center has an expected closure date of 2063. Solid waste received and processed at Simi Valley Landfill & Recycling Center comes from multi-family residential and commercial properties serviced by the City, including the Specific Plan Area.

Antelope Valley Public Landfill located in Palmdale, has a maximum permitted capacity of 30,200,000 cy and a remaining capacity of 12,194,026 cy (approximately 40 percent of the maximum permitted capacity (CalRecycle 2025a). The maximum permitted intake is 5,548 tons per day. Antelope Valley Public Landfill has an expected closure date of 2044. Solid waste received and processed at Antelope Valley Public Landfill comes from multi-family residential and commercial properties serviced by the City, including the Specific Plan Area.

Table 4.17-1 below summarizes the maximum daily throughputs and remaining capacities of the landfills serving the Specific Plan Area.

Table 4.17-1 Solid Waste Facilities Serving the Specific Plan Area

Facility	Maximum Daily Throughput (tons per day)	Remaining Capacity (cubic yards)	Estimated Closure Year
Sunshine Canyon City/County Landfill	12,100	66,200,000	2037
Antelope Valley Public Landfill	5,548	12,194,026	2044
Burbank Landfill No. 3	240	4,525,788	2116
Simi Valley Landfill & Recycling Center	64,750	79,783,835	2063

Source: CalRecycle 2025b; City of Burbank Public Works Department 2025

Hazardous waste requiring disposal is sent to the Kettleman Hills Hazardous Waste Facility, a 1,600-acre hazardous waste and municipal solid waste disposal facility with 499 acres currently available and permitted for waste management activities located southwest of Kettleman City in the western San Joaquin Valley (Waste Management 2025). The facility is regulated and inspected by the United States Environmental Protection Agency (USEPA), California Department of Toxic Substances Control (DTSC), Central Valley RWQCB, Kings County Department of Public Health, San Joaquin Valley Air Pollution District (SJVAPD), and CalRecycle. Permits are currently pending to expand the existing hazardous waste landfill to allow more years of disposal and to develop a new hazardous waste landfill on currently undeveloped land to open after the existing landfill reaches capacity.

e. Telecommunications, Electricity, and Natural Gas

Telecommunications services in Burbank are provided by private companies, including AT&T, Earthlink, and Spectrum, among others. The telecommunications provider used by residents and businesses in Burbank is subject to the user's discretion. Telecommunications facilities are generally available throughout the City.

BWP provides electricity service to Burbank, including the Specific Plan Area. BWP's electrical system includes high-voltage sub-transmission lines, electrical substations, distribution circuits, transformers, and revenue meters. BWP operates two 12kV distribution substations (Hollywood Way and Keystone Distributing Stations) and two customer substations (NBC and Warner) to serve the Media District area of Burbank. BWP produces some of its energy within Burbank through the Lake Generating Unit, as well as its share of the Magnolia Power Plant. BWP also relies heavily on importing electricity through its system interconnection with the Los Angeles Department of Water and Power (LADWP). BWP continually plans for long-term growth by addressing forecasted infrastructure impacts and power resource needs through both the BWP Electric Distribution Master Plan as well as the BWP Integrated Resource Plan. Any necessary infrastructure upgrades and power procurement needs are identified and budgeted for in the Capital Improvement Program (CIP) each year. BWP requires developments in Burbank to pay their share of on-site improvements, related off-site improvements, and substation capacity per the BWP Rules and Regulations, as well as the Burbank Municipal Code (BMC).

Southern California Gas Company (SoCalGas) provides natural gas service to Burbank, including the Specific Plan Area. In 2022, SoCalGas customers consumed a total of approximately 5 billion therms of natural gas (CEC 2025b). Residential users accounted for approximately 44 percent of SCG's natural gas consumption. Industrial and commercial users accounted for another 32 percent and 19 percent, respectively. The remainder was used for mining, construction, agricultural, and water pump accounts (CEC 2025b). Natural gas is also addressed in Section 4.5, *Energy*.

4.17.2 Regulatory Setting

The regulatory setting for utilities is provided below, organized by the topics addressed in this section, including water supply, wastewater, stormwater, solid waste, telecommunications, electricity, and natural gas.

a. Water Supply

State Regulations

Senate Bill 610

In 2001, California adopted Senate Bill (SB) 610, thereby amending the California Water Code (CWC). Under this law, certain types of development projects are required to provide detailed water supply assessments (WSA) to planning agencies. Any project that is subject to CEQA and meets the following definitions of a project (1) a proposed residential development of more than 500 dwelling units, (2) a proposed shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space, (3) a proposed commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space, (4) a proposed hotel or motel having more than 500 rooms, (5) a proposed industrial, manufacturing, or processing plant planned to house more than 1,000 persons, occupying more than 40 acres of lands, or having more than 650,000 square feet of floor area, (6) a mixed-use project that meets one or more of the project definitions above, or (7) a project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling-unit project, is subject to SB 610 and is required to prepare a WSA. The primary purpose of a WSA is to determine whether the identified water supply or water supplier will be able to meet projected demands for a project, in addition to existing and planned future uses, over a 20-year projection and with consideration to normal, dry, and multi-dry water years.

Urban Water Management Planning Act

The California Urban Water Management Planning Act (California Water Code Division 6, Part 2.6, Sections 10610-10657) requires all public water suppliers that provide municipal and industrial water to more than 3,000 customers, or supply more than 3,000 AFY of water, adopt an UWMP. An UWMP is intended to forecast future water demand and supply under normal and dry conditions. The UWMP must include a description of existing and planned sources of water available to the water supplier, conservation efforts to reduce water demand, alternative sources of water, assessment of reliability and vulnerability of water supply, and water shortage contingency analysis. It must be updated every five years and submitted to the California Department of Water Resources (DWR) for review. Metropolitan and BWP both maintain UWMPs for their water systems. BWP's 2020 UWMP was updated in June 2021 and is, therefore, used to inform this analysis.

California Code of Regulations

The CWC requires the Department of Public Health (CDPH) to establish water reclamation criteria. In 1975, the CDPH (the Department of Health Services at the time) prepared Title 22 to fulfill this requirement, regulating production/use of recycled water by establishing three categories of recycled water:

- Primary effluent, that typically includes grit removal and initial sedimentation or settling tanks;
- Adequately disinfected, oxidized effluent (secondary effluent), that typically involves aeration and additional settling basins; and
- Adequately disinfected, oxidized, coagulated, clarified, filtered effluent (tertiary effluent), that typically involves filtration and chlorination.

CCR Title 24, Part 5, establishes the California Plumbing Code (last updated in 2022 and pending 2025 update that shall become effective on January 1, 2026) which sets forth efficiency standards (i.e., maximum flow rates) for all new federally regulated plumbing fittings and fixtures, including showerheads and lavatory faucets.

CCR Title 24, Part 11, the California Green Building Standards (CALGreen) Code, establishes planning and design standards for sustainable site development energy efficiency, water conservation, material conservation, and internal air contaminants. These provisions were last updated in 2022 and are pending a 2025 update that shall become effective on January 1, 2026. Water conservation standards included in the 2025 update include water conserving fixtures and appliances and compliance with a water efficient landscape ordinance.

These regulations also apply to wastewater.

California Drought Update

In 2014, the governor issued a Drought State of Emergency Proclamation through Executive Order No. B-17-2014) and requested a voluntary 20-percent reduction in urban water use statewide, which directed the SWRCB to adopt Emergency Regulations. As a result, the State Board adopted Emergency Regulations for Statewide Urban Water Conservation that were documented in CCR Title 23, Sections 863–865.

In 2015, the governor issued Executive Order No. B-29-2015 for mandatory statewide water reductions to reduce water usage by 25 percent. The executive order directed local water agencies to increase enforcement over wasteful use of water and invest in modern technologies that will make California more drought resilient. The executive order established several provisions for water saving and increased enforcement against wasteful water use, including, but not limited to, the following:

- The SWRCB shall impose restrictions to achieve a statewide 25 percent reduction in potable urban water usage, compared to the amount used in 2013, through February 28, 2016;
- The DWR shall lead a statewide initiative to replace 50 million sf of lawns and ornamental turf with drought tolerant landscapes;
- The California Energy Commission (CEC), jointly with the DWR and SWRCB, shall implement a time-limited statewide appliance rebate program to replace inefficient household devices;
- The SWRCB shall impose restrictions to require that commercial, industrial, and institutional uses implement water efficiency measures to reduce potable water usage;
- The SWRCB shall prohibit irrigation with potable water of ornamental turf on public street medians;
- The SWRCB shall prohibit irrigation with potable water outside of newly constructed homes/buildings that is not delivered by drip or microspray systems; and
- The SWRCB shall require urban water suppliers to provide monthly information on water usage, conservation, and enforcement on a permanent basis.

In 2017, the governor issued Executive Order No. B-40-17 which lifted the drought emergency in California counties except Fresno, Kings, Tulare, and Tuolumne.

Local Regulations

Metropolitan's Integrated Water Resources Plan

The Specific Plan Area is located within the service areas of BWP (discussed above) which is a member agency of Metropolitan. Metropolitan's Integrated Water Resources Plan was first developed in 1996 to establish targets for a diversified portfolio of supply investments. The 2020 Integrated Water Resources Plan is a plan to provide water supplies under a wide range of potential future conditions and risks. It identifies supply actions including recycled water, seawater desalination, stormwater capture, conservation, and groundwater cleanup to ensure local water supply reliability. The 2020 Integrated Water Resources Plan was adopted by Metropolitan's board of directors in March 2022. The 2020 Integrated Water Resources Plan is separate from Metropolitan's UWMP and is incorporated by reference in the UWMP, as applicable.

Greater Los Angeles County Region IRWMP

The Greater Los Angeles County (GLAC) Integrated Regional Water Management Plan (IRWMP) is a regional plan designed to improve collaboration in water resources management. To make governance and stakeholder involvement manageable, the GLAC Region was organized into five subregions, which consider both geographic and demographic variations over the 2,058-square mile area. These subregions include the Lower San Gabriel and Los Angeles Rivers (Lower SG & LA), North Santa Monica Bay (North SM Bay), South Bay, Upper Los Angeles River Area (ULARA), and Upper San Gabriel and Rio Hondo Rivers (Upper SG & RH). Of these subregions, BWP is a member of the ULARA Steering Committee. The first IRWMP for the GLAC Region was published in 2006, following a multiyear collaborative effort between water retailers, wastewater agencies, stormwater and flood managers, watershed groups, businesses, tribes, the agriculture community, and non-profits. In 2014, the IRWM group updated the IRWMP to comply with new State integrated planning requirements and update the content (Leadership Committee of the GLAC IRWMP 2014). The IRWMP provides a mechanism for (1) coordinating, refining, and integrating existing planning efforts within a comprehensive, regional context; (2) identifying specific regional and watershed-based priorities for implementation projects; and (3) providing funding support for the plans, programs, projects, and priorities of existing agencies and stakeholders.

Burbank Water and Power 2020 Urban Water Management Plan

The 2020 UWMP was adopted by BWP in June 2021. The 2020 UWMP was prepared in compliance with the UWMP Act and serves as the long-term planning document to ensure BWP can provide reliable water supplies to its customers through 2045. The 2020 UWMP includes analysis of BWP's existing and future water supplies and demands, water supply reliability, a water shortage contingency plan, and water demand measures. BWP based its water demand forecasts on the City's 2021-2029 Housing Element Update and the Southern California Association of Government's (SCAG's) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Burbank2035 General Plan

The Burbank2035 General Plan (adopted February 2013) is the primary mechanism for guiding future population growth and development in Burbank and provides a guide for land use decision making.

The General Plan's Open Space and Conservation Element and Plan Realization Element address the conservation and enhancement of open space, parks, recreation, and natural resources within the City. The goals and policies of the Open Space and Conservation Element and Plan Realization Element that are intended to protect natural resources, including water resources, are presented below:

OPEN SPACE AND CONSERVATION ELEMENT

Goal 9: Water Resources

Adequate sources of high-quality water provide for various uses within Burbank.

- **Policy 9.1** Meet the goal of a 20 percent reduction in municipal water use by 2020.
- **Policy 9.2** Provide public information regarding the importance of water conservation and avoiding wasteful water habits.
- **Policy 9.3** Offer incentives for water conservation and explore other water conservation programs.
- **Policy 9.4** Pursue infrastructure improvements that would expand communitywide use of recycled water.
- **Policy 9.5** Require on-site drainage improvements using native vegetation to capture and clean stormwater runoff

PLAN REALIZATION ELEMENT

Program OSC-9: Regional Water Consultation

Consult with Metropolitan Water District of Southern California (Metropolitan) and the Los Angeles Regional Water Quality Control Board (RWQCB) to achieve the following water supply, distribution, and conservation objectives:

- Maintain groundwater recharge areas to protect water quality and ensure continued recharge of local groundwater basins.
- Reduce the amount of water used for landscaping and increase use of native and drought tolerant plants.
- Encourage the production, distribution, and use of recycled water for landscaping projects.
- Maintain water quality objectives for urban runoff.
- Comply with all provisions of the NPDES permit, and support regional efforts by the Los Angeles RWQCB to improve and protect surface water quality.

Program OSC-11: Burbank Urban Water Management Plan and Recycled Water Master Plan

Continue to update the Burbank Urban Water Management Plan and Recycled Water Master Plan every five years to serve as foundational documents and source of information for WSAs and Written Verifications of Water Supply. Include estimates for population, water demand, and water supply with projections in five-year increments to 2035. Use the Recycled Water Master Plan to ensure the use of recycled water wherever allowed and feasible.

City of Burbank Sustainable Use Ordinance

Title 8, Chapter 2, Article 3, Sustainable Water Use Ordinance, of the BMC established procedures for implementing and enforcing sustainable water use practices to mitigate the effect of a shortage of water resources. The ordinance establishes mandatory water use practices when implemented by resolution of the City Council. Such practices relate to outdoor uses, such as irrigation of outdoor landscaped areas, washing down of driveways and walkways, use of evaporative coolers (misters), and the filling or refilling of swimming pools and spas. The ordinance also established mandatory restrictions on service of drinking water at restaurants, hotels, and eating establishments if not requested by customers. The ordinance established six incremental stages of water use restrictions and penalties in order to discourage wasteful water use practices and achieve reduced water consumption and conservation during drought conditions.

b. Wastewater

State Regulations

California Code of Regulations

Refer to the Title 22 and Title 24 (Parts 5 and 11) regulations under Water Supply (page 4.17-5).

Local Regulations

Burbank Sewer System Management Plan

In compliance with SWRCB Order No. 2006-0003-DWQ, the City has adopted a SSMP that also includes a Sanitary Sewer Overflow Emergency Response Plan. The SSMP addresses the operation, maintenance, design, and performance of the City's sewers and provides an overflow emergency response plan and a system evaluation and capacity assurance plan to reduce the frequency and volume of sanitary sewer overflows. Implementation of the SSMP requires the City to (1) properly fund, manage, maintain, and operate its sanitary sewer systems to prevent sanitary sewer overflows; (2) construct and maintain the collection system using trained staff possessing adequate knowledge, skills, and abilities, as demonstrated through validated programs; and (3) fully comply with SWRCB Order No. 2006-0003-DWQ.

Burbank Sewer System Evaluation and Capacity Assurance Plan

The City prepared a Sewer System Evaluation and Capacity Assurance Plan (SSECAP) in 2006 (Chapter 8 of the Burbank SSMP). The SSECAP includes hydraulic modeling of the City's existing wastewater system. The SSECAP also identified areas of future study that are cost-effective and technically feasible to address both potential capacity and operational constraints and are coordinated with other improvement projects. The plan contained the following key objectives:

- Properly fund, manage, operate, and maintain all parts of the wastewater collection system;
- Provide adequate capacity to convey peak sewer flows;
- Minimize the frequency of sanitary sewer overflows (SSOs); and
- Construct and maintain the collection system using trained staff possessing adequate knowledge, skills, and abilities as demonstrated through a validated program.

The SSECAP and the City's capital improvement plan (CIP) provide hydraulic capacity of key sanitary sewer system elements for peak flow conditions to facilitate design of sufficient capacity to accommodate runoff during storm events.

Burbank Municipal Code

Title 8, Chapter 1, Sewers, of the BMC establishes regulatory compliance for discharges to the publicly owned treatment works, sewer system, and storm drain system for the City; and requires compliance with applicable State and federal laws, including the CWA (33 United States Code 1251 et seq.) and the general pretreatment regulations (40 Code of Federal Regulations Part 403). Pursuant to BMC Section 8-1-301, approval must be granted by Public Works through an excavation permit and a sewer connection permit to connect to the City's main sewer line. For sewer construction entirely on private property, the owner must obtain a plumbing permit from the Building Department, and an excavation permit from Public Works.

c. Stormwater

State Regulations

California Code of Regulations – Recycled Water Regulations (Titles 22 and 17)

Titles 22 and 17 of the CCR include regulations for the various uses of recycled water within the State. According to the CCR, recycled water used for the following purposes shall be at least disinfected secondary-23 recycled water: (1) industrial boiler feed, (2) nonstructural firefighting, (3) backfill consolidation around non-potable piping, (4) soil compaction, (5) mixing concrete, (6) dust control on roads and streets, (7) cleaning roads, sidewalks and outdoor work areas, and (8) industrial process water that will not come into contact with workers. The CCR also requires that spray, mist, or runoff of recycled water does not enter dwellings, designated outdoor eating areas, or food handling facilities. Drinking water fountains must also be protected against contact with recycled water spray, mist, or runoff. No irrigation with, or impoundment of, disinfected secondary-2.2 or disinfected secondary-23 recycled water can take place within 100 feet of any domestic water supply well.

Municipal Regional Stormwater NPDES Permit

On November 8, 2012, the RWQCB adopted Order R4-2012-0175, the MS4 Permit. Order R4-2012-0175 became effective on December 28, 2013, and serves as the NPDES permit for coastal watershed stormwater and non-stormwater discharges originating from the Los Angeles County region. The permit covers the land areas in the Los Angeles County Flood Control jurisdiction, unincorporated areas of Los Angeles County, and 84 cities in the County. The City of Burbank is included in the MS4 Permit as a permittee under Order R4-2012-0175.

In coordination with permittees under MS4 Permit, RWQCB staff performs annual performance reviews and evaluations of the City's stormwater management program and NPDES compliance activities.

Local Regulations

City of Burbank2035 General Plan

The Burbank2035 General Plan (adopted February 2013) is the primary mechanism for guiding future population growth and development in Burbank and provides a guide for land use decision making.

The General Plan's Safety Element and Open Space and Conservation Element address the conservation and enhancement of open space, parks, recreation, and natural resources within the City. The goals and policies of the Open Space and Conservation Element and Plan Realization Element that are intended to protect natural resources, including water resources, are presented below:

SAFETY ELEMENT

Goal 6: Flood Safety

Potential risks—such as injury, loss of life and property, and economic and social disruption—caused by flood and inundation are minimized.

Policy 6.5 Enforce regulations prohibiting the draining of rainwater into the sewer system.

Policy 6.6 Ensure proper maintenance and improvements to storm drainage facilities. Evaluate maintenance and improvements to storm drainage facilities based on projected changes to storm frequencies and intensity.

Policy 6.7 Employ strategies and design features to reduce the area of impervious surface in new development projects.

OPEN SPACE AND CONSERVATION ELEMENT

Goal 9: Water Resources

Adequate sources of high-quality water provide for various uses within Burbank.

Policy 9.5 Require on-site drainage improvements using native vegetation to capture and clean stormwater runoff.

d. Solid Waste

State Regulations

Assembly Bill 1327

The California Solid Waste Reuse and Recycling Access Act of 1991 or Assembly Bill (AB) 1327, as amended, requires each local jurisdiction in the State to adopt an ordinance requiring commercial, industrial, or institutional buildings; marinas; or residential buildings having five or more living units to provide an adequate storage area for the collection and removal of recyclable materials. The City passed an ordinance in compliance with AB 1327 in 1997.

Assembly Bill 939 and Senate Bill 1016

The California Integrated Waste Management Act of 1989, or Assembly Bill (AB) 939, established the Integrated Waste Management Board, required the implementation of integrated waste management plans, and mandated that local jurisdictions divert at least 50 percent of all solid waste generated (from 1990 levels), beginning January 1, 2000, and divert at least 75 percent by 2010. In 2008, SB 1016 updated the requirements. The updated per capita disposal and goal measurement system moves the emphasis from an estimated diversion measurement number to using an actual disposal measurement number as a factor, along with evaluating program implementation efforts. These two factors will help determine each jurisdiction's progress toward achieving its AB 939

diversion goals. The 75-percent diversion requirement is now measured in terms of per-capita disposal expressed as pounds per person per day.

Assembly Bill 341 and Senate Bill 1383

The purpose of AB 341, enacted in 2011, is to reduce greenhouse gas (GHG) emissions by recycling commercial solid waste rather than diverting it for landfill disposal, and to expand the opportunity for additional recycling services and recycling manufacturing facilities in California. In addition to Mandatory Commercial Recycling, AB 341 sets a statewide goal for 75- percent disposal reduction by the year 2020. The purpose of SB 1383, enacted in 2020, is to continue the statewide goal of a 75 percent disposal reduction with an extended goal year of 2025.

Senate Bill 1374

In 2002, Construction and Demolition Waste Materials Diversion Requirements (SB 1374) amended the California Public Resources Code to require jurisdictions to include in their annual AB 939 report a summary of the progress made in diverting construction and demolition waste. The legislation also required that CalRecycle adopt a model ordinance for diverting 50 to 75 percent of all construction and demolition waste from landfills.

Zero Waste California

Zero Waste California is a State program launched by CalRecycle in 2002 to promote a new vision for the management of solid waste. Zero waste provides that wasting resources is inefficient and that the efficient use of natural resources should be achieved. The concept requires maximizing existing recycling and reuse efforts, while ensuring that products are designed for the environment and have the potential to be repaired, reused, or recycled. The Zero Waste California program promotes the goals of market development, recycled product procurement, and research and development of new and sustainable technologies.

California Green Building Standards (CALGreen) Code

Effective January 1, 2023, the 2022 CALGreen Code requires developers of newly constructed buildings to develop a waste management plan to divert 65 percent of the construction waste generated by project construction. Builders or developers are required to submit a construction waste management plan to the appropriate jurisdiction's enforcement agency. The City has adopted the 2022 CALGreen Code as part of the BMC.

Local Regulations

County of Los Angeles Integrated Waste Management Plan

The County of Los Angeles Countywide Integrated Waste Management Plan (CIWMP), approved by the CalRecycle in 1999, sets forth a regional approach for the management of solid waste through source reduction, recycling and composting, and environmentally safe transformation and disposal. The CIWMP ensures that the waste management practices of cities and other jurisdictions in the County are consistent with the solid waste diversion goals of AB 939 through source reduction, recycling and composting programs, household hazardous waste management programs, and public education awareness programs. The plan calls for the establishment of 50 years of in-County permitted landfill capacity, as well as the County's support for the development of disposal facilities outside the County.

The County continually evaluates landfill needs and capacity through the preparation of the CIWMP annual reports. Within each annual report, future landfill disposal needs over the next 15-year planning horizon are addressed, in part, by determining the available landfill capacity. The most recent annual report is the 2024 report, completed in June 2024.

As part of the CIWMP, the County prepared the Countywide Siting Element, which identified goals, policies, and strategies for the proper planning and siting of solid waste disposal and transformation facilities over 15 years, through year 2014. The latest Siting Element was approved by CalRecycle in 2022 and, as with the previous Siting Element, provides strategic planning over a 15-year horizon, from 2018 through 2033.

Burbank Municipal Code

Title 4, Chapter 2, Article 1, *Solid Waste Management*, of the BMC establishes regulatory compliance for the collection, removal and disposal of garbage, solid waste, green waste, organics, and recyclable material within the City. Title 4, Chapter 2, Article 1, *Solid Waste Management*, of the BMC also adopts SB 1383 and requires source separation by solid waste generators to ensure organics are diverted from landfills. Title 4, Chapter 2, Article 1, *Solid Waste Management*, also requires reporting by authorized collectors to demonstrate compliance with SB 1383 requirements. Title 4, Chapter 2, Article 4, *Waste Reduction Regulations*, establishes the City's waste reduction ordinance which reduces the use and distribution of polystyrene and single-use food ware.

Burbank Construction and Demolition Debris Diversion Ordinance

The Construction and Demolition Debris Ordinance was designed to meet the goals of the diversion requirements of the California Integrated Waste Management Act of 1989 (AB 939). The ordinance requires new building projects meeting specified size requirements to divert and recycle at least 65 percent of their construction and demolition debris. To obtain a building or demolition permit from the City, proponents for projects meeting specified size requirements must prepare and implement a Waste Management Plan (WMP) that outlines how much scrap and debris would be generated during construction, what proportion of this debris would be diverted and how, and certification that the minimum diversion requirement will be met.

City of Burbank Sustainability Action Plan and Zero Waste Policy

In January 2008, the City Council adopted the Sustainability Action Plan to support the United Nations' Urban Environmental Accords. The Sustainability Action Plan addresses the City's efforts toward providing a clean, healthy, and safe environment. The Accords include 21 specific actions organized into seven urban themes designed to collectively address urban sustainability concerns. The themes include energy, waste reduction, urban design, urban nature, transportation, environmental health, and water (City of Burbank 2008). Action items related to waste include zero waste, manufacturer responsibility, and consumer responsibility. As part of the Sustainability Action Plan, the City adopted the Zero Waste Strategic Plan, which includes a goal to achieve zero waste by 2040. The Zero Waste Plan includes four basic strategies, with a priority placed on "upstream" solutions to eliminate waste before it is created. The plan also includes actions to build on the City's traditional "downstream" recycling programs to fully utilize the existing waste diversion infrastructure (City of Burbank 2008b). The four basic strategies include:

1. Advocate for Manufacturer Responsibility for Product Waste and Support Elimination of Problem Materials
2. Adopt New Rules and Incentives to Reduce Waste
3. Expand and Improve Local and Regional Recycling and Composting
4. Educate, Promote, and Advocate a Zero Waste Sustainability Agenda

e. Telecommunications, Electricity, and Natural Gas

Federal Regulations

Federal Energy Regulatory Commission

The Federal Energy Regulatory Commission (FERC) is an independent agency that regulates the interstate transmission of electricity, natural gas, and oil. The Energy Policy Act of 2005 gave FERC additional responsibilities in its capacity. The Federal Communications Commission (FCC) regulates interstate and international communications by radio, television, wire, satellite, and cable in all 50 states.

State Regulations

California Public Utilities Commission

The California Public Utilities Commission (CPUC) regulates private and investor-owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies.

The CPUC regulates natural gas rates and natural gas services, including in-state transportation over the utilities' transmission and distribution pipeline systems, storage, procurement, metering, and billing.

California Energy Commission

The CEC regulates publicly owned utilities, such as BWP, to ensure compliance with State mandates. In addition, the City Council ensures the City's compliance with CEC regulations, reporting, and compliance filings for power supply by BWP. The CEC is the State's primary energy policy and planning agency.

Local Regulations

Burbank2035 General Plan

The Burbank2035 General Plan includes a Land Use Element, Air Quality and Climate Change Element, as well as an Open Space and Conservation Element, which address sustainability, energy efficiency and overall energy reduction in the City. The goals and policies of each element are intended to increase the City's overall energy efficiency and help achieve the City's goal of using 100 percent clean energy. The goals and policies applicable to energy resources are presented below:

Burbank2035 Land Use Element

Goal 2: Sustainability

Burbank is committed to building and maintaining a community that meets today's needs while providing a high quality of life for future generations. Development in Burbank respects the environment and conserves natural resources.

Policy 2.3 Require that new development pay its fair share for infrastructure improvements. Ensure that needed infrastructure and services are available prior to or at project completion.

Burbank2035 Air Quality and Climate Change Element

Goal 3: Reduction of Greenhouse Gas Emissions

Burbank seeks a sustainable, energy-efficient future and complies with statewide greenhouse gas reduction goals.

Policy 3.8 Transition all economic sectors, new development, and existing infrastructure and development to low- or zero-carbon energy sources. Encourage implementation and provide incentives for low- or zero-carbon energy sources.

Policy 3.9 Continue efforts to diversify Burbank Water and Power's energy portfolio beyond 2020.

Burbank2035 Open Space and Conservation Element

Goal 10: Energy Resources

Burbank conserves energy, uses alternative energy sources, and promotes sustainable energy practices that reduce pollution and fossil fuel consumption.

Policy 10.1 Incorporate energy conservation strategies in City projects.

Policy 10.2 Promote energy-efficient design features to reduce fuel consumption for heating and cooling.

Policy 10.3 Continue to acquire alternative fuel vehicles like hybrid, natural gas, electric, or hydrogen-powered vehicles when adding to the City's vehicle fleet.

Policy 10.4 Encourage residents and businesses to reduce vehicle use or to purchase alternative fuel vehicles.

Policy 10.5 Promote technologies that reduce use of non-renewable energy resources.

Policy 10.6 Support private sources of sustainable, environmentally friendly energy supplies.

Policy 10.7 Encourage the use of solar energy systems in homes and commercial businesses as a form of renewable energy.

Burbank Municipal Code

Title 8, Chapter 2, *Utilities*, of the BMC establishes the authority of the City Council and General Manager of BWP to prescribe rules, regulations, fees, charges, and other additional requirements related to energy and energy use within the City.

4.17.3 Impact Analysis

a. Thresholds of Significance

For purposes of this environmental analysis, thresholds of significance are based on the questions in Appendix G of the CEQA Guidelines, which states that impacts related to utilities and service systems would be potentially significant if implementation of the proposed Project would do any of the following:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.
2. Not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple-dry years.
3. Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
4. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.
5. Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Thresholds 1 through 4 are analyzed below.

The guidance for energy conservation analysis under Appendix F of the *CEQA Guidelines* is also addressed in the following Methodology discussion, as well as in Section 4.5, *Energy*, Section 5, *Other CEQA Considerations,* and Section 6, *Alternatives* of this EIR.

b. Effects Found Not to be Significant

Threshold 5 was determined to have a less than significant impact and, therefore, is discussed under Section 4.19, *Effects Found Not to be Significant* and summarized below.

A significant impact could occur if the policies established by the proposed Project would conflict with any statutes and regulations governing solid waste. In compliance with State legislation, future development under the proposed Project would be required to implement a Solid Waste Diversion Program and divert at least 75 percent of the solid waste generated from the applicable landfill site. Future development projects under the proposed Project would also comply with federal, State, and local statutes and regulations related to solid waste, such as the California Integrated Waste Management Act (Assembly Bill [AB] 939), mandatory commercial recycling (AB 341, AB 1826), California Senate Bill 1383 (SB 1383), and the City's recycling program. Since future development projects under the proposed Project would comply with applicable federal, State, and local regulations involving solid waste, impacts related to conflict with statutes and regulations governing solid waste would be less than significant.

c. Methodology

Impacts related to utilities and service systems were evaluated by forecasting utility demands associated with the buildout of the proposed Project and comparing such demands to current and planned service system capacity. The analysis below is informed by outputs from the CalEEMod

prepared for future development projects under the proposed Project, coordination with City staff, as well as publicly available data and reports from the City of Burbank, BWP, and other publicly available sources of information, as cited throughout the discussion below. In addition, the analysis considers under Impact UTIL-1 the following potential environmental impacts related to energy, which are identified in Appendix F of the *CEQA Guidelines*, Section II.C:

- The effects of the project on local and regional energy supplies and on requirements for additional capacity.
- The effects of the project on peak and base period demands for electricity and other forms of energy.
- The effects of the project on energy resources.

Utility and service system demands resulting from the buildout of the proposed Project were quantified where possible, based upon readily available public information and industry standards, with all assumptions identified in the analysis below. Where insufficient data were available to quantify utility and service system demands, such demands are discussed qualitatively in order to inform the impact analysis.

d. Project Impacts

Threshold 1:	Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Impact UTIL-1 **FUTURE DEVELOPMENT PROJECTS UNDER THE PROPOSED PROJECT WOULD REQUIRE UTILITY SERVICE AND CONNECTIONS FOR WATER SUPPLY, WASTEWATER CONVEYANCE, AND STORMWATER CONVEYANCE, AS WELL AS TELECOMMUNICATIONS, ELECTRICITY, AND NATURAL GAS. EXISTING UTILITY SYSTEMS FOR WATER, ELECTRIC POWER, NATURAL GAS, AND TELECOMMUNICATIONS FACILITIES IN BURBANK HAVE SUFFICIENT CAPACITY TO SERVE FUTURE DEVELOPMENT PROJECTS UNDER THE PROPOSED PROJECT; HOWEVER, NEW CONNECTIONS TO EXISTING AND EXPANDED WASTEWATER SERVICE SYSTEMS WOULD BE REQUIRED, AND SUCH CONNECTIONS WOULD RESULT IN EXCEEDANCE OF THE BURBANK WATER RECLAMATION PLANT'S (BWRP) CURRENT CAPACITY CAUSING POTENTIALLY SIGNIFICANT ENVIRONMENTAL EFFECTS. POTENTIAL FUTURE IMPROVEMENTS NECESSARY TO INCREASE THE TREATMENT CAPACITY OF THE BWRP HAVE BEEN PRELIMINARILY ESTABLISHED. SHORT- AND LONG-TERM MITIGATION MEASURES ARE REQUIRED TO REDUCE THE POTENTIAL IMPACTS AND INCREASE THE TREATMENT CAPACITY OF THE BWRP. NONETHELESS, IMPACTS TO THE WASTEWATER TREATMENT FACILITIES FROM THE PROPOSED PROJECT REMAIN SIGNIFICANT AND UNAVOIDABLE UNTIL THE FUTURE WASTEWATER SYSTEM IMPROVEMENTS ARE IMPLEMENTED.**

Future development projects under the proposed Project would involve approximately 9,702 residential units, 3,986,207 square feet of commercial development, and 400 hotel rooms. Impacts associated with the proposed Project are discussed below.

Water Supply

Construction activities associated with future development projects under the proposed Project would require recycled water for dust suppression, concrete manufacturing, and such activities as washing wheels and equipment. Temporary construction recycled water would be trucked to active construction sites or produced from existing fire hydrants near the applicable site(s), with City

approval. Temporary construction water demands would not require new connections or conveyance facilities as existing or mobile facilities would be used.

New water supply connections and associated facilities would be required for future development projects under the proposed Project to convey potable water supply to future development. Such upgrades would occur within existing and new utility easements and would be located underground, primarily within existing roadways. Housing development under the proposed Project would be located in previously developed areas that are either currently zoned for residential development or would be rezoned for residential development under the proposed Project. Similarly, commercial and hotel development under the proposed Project would be located in previously developed areas that are either currently zoned for commercial or hotel development, respectively, or would be rezoned for commercial or hotel development under the proposed Project. As shown in Figure 2-2 of Section 2, *Project Description*, the Specific Plan Area is previously disturbed and largely urbanized. Due to the built-up nature of this area, there are substantial existing utility rights-of-way previously established, largely within existing roadways, which are prevalent. New water service connections that may be required for development associated with the proposed Project would be conducted within previously disturbed areas and existing rights-of-way and would be consistent with utility expansion in urbanized areas, such that minimal areas of new disturbance would occur. Although all parcels in Burbank have access to public utility infrastructure, in some cases, the infrastructure is older and in need of replacement or insufficient to meet the needs of a particular project. Pursuant to General Plan Land Use Policy 2.3, new development would be required to pay for their fair share of upgrading the utility infrastructure as needed to serve their project. This may include installing larger water mains, new water meters, and/or upgrades to existing facilities.

Developers are responsible for funding any infrastructure improvements that are required to mitigate project impacts and have not been previously identified as part of a capital improvement program covered by the development impact fees. Consistent with applicable State law, the City's development fees would ensure that the developers pay the cost attributable to the increased demand for the affected public facilities reasonably related to the development project in order to refurbish the existing facilities to maintain the existing level of service or achieve an adopted level of service that is consistent with the City's General Plan.

As individual development projects under the proposed Project are proposed and considered for approval by the City, project proponents would be required to demonstrate that any identified system deficiencies reasonably related to the development project are adequately addressed by the responsible project proponent and future upgrades are designed in accordance with the BMC and to the satisfaction of BWP. In addition, the City requires applicants to coordinate with the Burbank Fire Department and City of Burbank Building and Safety Division to ensure that existing and planned fire hydrants provide sufficient fire flow pressure requirements. The City's issuance of building permits is contingent upon review, testing, and approval that sufficient fire flow pressure is provided for the applicable site. Due to the existing built-up nature of the City, it is reasonably anticipated that future improvements for water supply and fire flow requirements would not disturb previously undisturbed areas and would be situated within existing utility rights-of-way, such as, but not limited to, within public roadways.

Water supply for individual developments under the proposed Project would be provided by BWP, which purchases imported surface water supplies from the SWP and the Colorado Aqueduct via Metropolitan, as well as local groundwater supplies, which are pumped by the City in accordance with groundwater credits consistent with the local Adjudication Judgment for the underlying groundwater basin. The availability and reliability of water supply for the proposed Project is addressed below,

under Impact UTIL-2. Potential impacts related to relocation or construction of water supply facilities would be less than significant.

Wastewater

Future development projects under the proposed Project would require new connections for wastewater conveyance. As described in Section 4.17.1(b) above, wastewater conveyance in Burbank is provided by approximately 230 miles of City-owned and operated underground pipelines and associated pump stations. Public Works is responsible for the maintenance of the City's sewer mainlines, while individual property owners are responsible for the maintenance of the sewer laterals that connect buildings to mainlines. All structures producing sewage or liquid waste in the City of Burbank must be connected to the sewer system mainline by sewer lateral lines, which require issuance of an excavation permit and a sewer connection permit from the Public Works Permit Section (City of Burbank 2026). All sewer connections are subject to a Sewer Service Charge (SSC). The majority of wastewater generated in the City is conveyed to the BWRP for treatment prior to discharge in accordance with an existing NPDES permit. Project impacts related to wastewater treatment capacity at BWRP are discussed further under Impact UTIL-3.

Future development projects under the proposed Project would occur in compliance with the requirements of BMC Title 8, Chapter 1, *Sewers*, which establishes City standards related to wastewater discharge, peak flow, and sewer capacity. New connections to the City sewer system, including the construction of new laterals connecting to the sewer mainline, would be subject to permitting approval by the Public Works Permit Section (City of Burbank 2026). New wastewater conveyance connections are allowed and it would be the responsibility of the private property owner to connect their private sewer lateral to the City sewer main provided that the appropriate permits are obtained, and sufficient capacity exists prior to construction. Although all parcels in Burbank have access to public utility infrastructure, in some cases the infrastructure is older and in need of replacement to meet the needs of a particular project. Pursuant to Burbank2035 General Plan Land Use Policy 2.3, new development is required to pay for their share of upgrading the utility infrastructure as needed to serve their project. Based on project-specific conditions and Burbank2035 General Plan Land Use Policy 2.3, a sewer capacity analysis would be required for individual development projects under the proposed Project to determine the applicable development fees and any physical improvements that would be needed to ensure the City's wastewater system can adequately accommodate these future development projects. Based on the results of the project-specific sewer capacity analysis, these improvements may include, but are not limited to, installing new or larger sewer lines and/or upgrading existing facilities.

According to the Focused Sewer Capacity Analysis, the proposed Project would require upsizing approximately 3.8 miles of gravity mains to accommodate the City's planned growth (Appendix H). Wastewater flows to the BWRP which currently has limited remaining capacity with the ability to treat sewer inflows at an average rate of approximately 8.5 MGD (Appendix H). The Focused Sewer Capacity Analysis also determined that the additional wastewater flows generated by development under the proposed Project would result in approximately 3.07 MGD of wastewater inflows to the BWRP, which would account for approximately 36 percent of the current BWRP daily rate of 8.5 MGD. Therefore, the proposed Project would result in additional wastewater flows that would account for a large portion of the existing daily rate of the BWRP and would exceed the existing limited remaining capacity, which would require substantial facility improvements to accommodate this additional wastewater flow and impacts would be potentially significant.

Potential future improvements to increase the treatment capacity of the BWRP would require upgrades to the headworks, the addition of new primary clarifiers, modifications to the secondary treatment process, and expansion of the equalization basins (beyond the near-term 10-year planning horizon). Additionally, BWRP expansion would likely require the City to acquire new land to build some of these improvements due to limited space in the current BWRP property. Although precise details of construction (i.e., timing, equipment, location of land acquisitions) of these future wastewater treatment improvements to increase the wastewater treatment capacity are not available at the time of preparation of this EIR, planning activities including updated rate studies, nexus studies to update development fees, and creation of a capital improvement program for construction of future improvements are necessary to support future upgrades to the wastewater system to mitigate impacts from the proposed Project. However, until such upgrades are implemented, the environmental impacts from new or expanded wastewater conveyance associated with future development under the proposed Project would remain significant and unavoidable.

Stormwater

Future development projects under the proposed Specific Plan would not result in a substantial increase in impervious surfaces since they would be focused in urban infill areas already largely covered with impervious surfaces. Compliance with Sections 9-3-413 and 9-3-414 of the BMC would ensure that future development projects resulting from the proposed Specific Plan would be implemented with appropriately sized and sited stormwater conveyance facilities. In the long-term, redevelopment of properties in the Specific Plan Area is anticipated to improve the quality and reduce the amount of stormwater runoff by replacing older development with new development that incorporates LID methods. LID methods include features, such as stormwater detention basins and vegetated swales, that slow the velocity of surface runoff and filter some water quality constituents before the runoff percolates to the underlying groundwater system or is conveyed through the City's or LACFCD's stormwater infrastructure. In accordance with the BMC, post-construction stormwater runoff from new projects must be captured and used to the maximum extent practicable, including through the implementation of on-site BMPs for stormwater management. Therefore, while future development projects under the proposed Specific Plan would include site-specific stormwater drainage and conveyance facilities, such facilities would be designed and built in accordance with the BMC and BMPs for stormwater management. Compliance with existing local regulations, BMPs, and stormwater management standards would reduce the potential for impacts related to relocation or construction of new stormwater facilities, and potential impacts would be less than significant.

Telecommunications, Electricity, and Natural Gas

Telecommunications

The Specific Plan Area is highly urbanized with existing above- and below-ground telecommunications infrastructure. Telecommunications services are provided by ONE Burbank, AT&T, EarthLink, Spectrum, or other providers, at the discretion of current and future residents. Future development projects under the proposed Specific Plan would increase demand for existing telecommunications in the Specific Plan Area. Individual telecommunication providers implement planned improvements throughout their service areas on an as-needed basis, which are typically limited to small-scale upgrades and new facilities in existing developed areas. Telecommunication services are generally available in the City, and substantial upgrades to existing telecommunications facilities would not likely be necessary. Construction of additional telecommunications facilities or upgrades to existing facilities to meet demands from future development projects under the proposed Specific Plan would

be undertaken by private telecommunication service providers in accordance with applicable federal, State, and local regulations. No restrictions on the ability to provide adequate telecommunication service are present or anticipated to occur as a result of buildout of the proposed Project. In addition, due to the built-up conditions in the Specific Plan Area, and the nature of telecommunication upgrades being small-scale and sited within the development footprint of new projects, potential impacts associated with new or expanded facilities would be less than significant.

Electricity

Electricity in Burbank is provided by BWP, which maintains a fully functional system of above-ground and underground electrical facilities, primarily found along roadways throughout the Specific Plan Area. BWP's electrical system includes high-voltage sub-transmission lines, electrical substations, distribution circuits, transformers, and revenue meters. Future development projects that would occur under the proposed Project would require electric power. The services would be provided by BWP through new future connections that would be implemented on a project-specific basis and subject to the review and approval of BWP. New electricity service connections that may be required for future development associated with the proposed Project would be conducted within previously disturbed areas and existing rights-of-way and would be consistent with utility expansion in urbanized areas. Project proponents would be responsible for contributing their fair share of electrical facilities upgrades, as further described below.

BWP determined that build out of the proposed Project would demand an additional 29 megawatts (MW) for residential development and 25 MW for commercial development, totaling 54 MW of additional electrical demand. BWP has a limitation of 450 MW at the existing system interconnection with LADWP. BWP may also elect to operate the 40 MW Lake Generating Unit[1] to serve system capacity needs, bringing the potential available system capacity to 490 MW (BWP 2025). Considering BWP's all-time peak of 322 MW and the additional forecasted load growth associated with Citywide planned development of 99 MW, BWP is forecasting a new system peak of 421 MW. This would result in approximately 69 MW of total available capacity to serve additional developments before additional interconnection capacity would be necessary. Therefore, while the proposed Project's additional electrical demand of 54 MW would result in an increase in peak period demands for electricity, the additional demand would be within BWP's remaining electrical capacity. Therefore, development under the proposed Project would not require BWP to increase its electricity capacity (Appendix K).

As detailed in Section 4.17.1, *Setting*, BWP operates two 12kV distribution substations and two customer substations to serve the Specific Plan Area. While there is sufficient distribution substation capacity to meet its current needs, BWP is currently in the process of building a new 12kV substation in the Specific Plan Area by 2030 which would help serve short-term electricity demand increases (Appendix K). Future development projects under the proposed Project would be responsible for contributing their fair share of electrical on-site improvements and related off-site improvements based on the electrical demand for each project, as required by BWP, Title 8, Chapter 2 of the BMC, and Burbank2035 Land Use Element Policy 2.3. Construction of additional electrical facilities or upgrades to existing facilities to meet demands from future development under the proposed Project would be undertaken by BWP in accordance with applicable federal, State, and local regulations. No restrictions on the ability to provide adequate electrical service are present or anticipated to occur as

[1] The Lake Generating Unit is typically relied upon during summer peak days or when the Magnolia Power Plant is down for maintenance. Given that this generating unit is a tertiary backup to the Magnolia Power Plant and the LADWP interconnection, this generating capacity can be relied upon to provide base capacity in BWP's electric system. It should be noted that emissions limitations coupled with cost limitations may impact the use of this generating unit.

a result of buildout of the proposed Project. In addition, due to the built-up conditions in the Specific Plan Area, and the nature of electrical facilities upgrades being small-scale and sited within the development footprint of new projects, potential impacts associated with new or expanded facilities would be less than significant.

Natural Gas

Natural gas infrastructure is located throughout Burbank, typically underground and beneath existing paved roadways. Future development projects under the proposed Project would increase the demand for natural gas and associated connections. Natural gas is provided by SoCalGas, which projects total gas demand to decline at an annual rate of approximately 0.7 percent per year from 2020 through 2040 due to better energy efficiency and updated fuel substitution assumptions (SoCalGas 2024). Other factors that contribute to the downward trend are tighter standards created by revised Title 20 and 24 requirements, a decline in core commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure. Based on the 2024 *California Gas Report*, SoCalGas will meet its projected demand for natural gas resources through at least 2040 as determined by modeled forecasts (SoCalGas 2024).

Although future development projects associated with the proposed Project would increase the number of natural gas connections in the Specific Plan Area, all new development would be designed for consistency with the CPUC mandates for implementing energy efficiency standards and practices. In addition, as development of additional renewable energy sources for SoCalGas continues to expand, it is reasonably inferred that demand for natural gas will decrease due to better energy efficiency and updated fuel substitution assumptions. Therefore, although natural gas connections would likely increase due to development under the proposed Project, the per capita demand for natural gas in the City is expected to continue decreasing through compliance with CPUC mandates for energy efficiency standards and practices, and through the greater diversification of energy supplies to include a suite of renewable energy sources in addition to natural gas. Compliance with existing State regulations would ensure that impacts related to natural gas facilities would be less than significant.

Mitigation Measure

The following mitigation measures have been incorporated to identify specific sewer service constraints, sewer capacity issues and necessary mitigations relative to future development under the proposed Project.

UTIL-1a Completion of a Sewer Service Constraints Analysis

The City will complete the ongoing analysis to identify specific sewer service constraints and sewer capacity issues within the City's wastewater system including a Citywide assessment of system capacity relative to future development under the proposed Project and more broadly throughout the City. The analysis will identify upgrades necessary to mitigate the constraints in the system to ensure that future development projects implemented under the proposed Project can be completed and that sufficient capacity and conveyance in the wastewater system exists. If a proposed development has a construction schedule that the City cannot accommodate prior to the completion of this analysis, the developer may be responsible for performing the necessary sewer infrastructure upgrades per BMC 8-1-304.

UTIL-1b Complete a Sewer Master Plan

Based on the constraints identified in the sewer service constraints analysis, the City's Public Works Department will complete the ongoing Sewer Master Plan to evaluate the City's sewer conveyance and treatment system over the next ten years (i.e., the proposed Project planning horizon) and beyond. The Sewer Master Plan will identify a plan to complete specific capital improvements to upgrade the City's wastewater treatment system, including improvements to the Burbank Water Reclamation Plant, to reduce identified constraints and address capacity issues to accommodate future development under the proposed Project in combination with broader projected future Citywide development.

UTIL-1c Develop a Capital Improvement Project

Based on the Focused Sewer Capacity Analysis, the City's Public Works Department will develop a long-term capital improvement project in the Sewer Master Plan to upsize approximately 3.8 miles of gravity main improvements to accommodate projected flows from the proposed Project.

UTIL-1d Prepare an Updated Nexus Fee Study to Allocate Pro-Rata Infrastructure Costs to Future Development

To fund the capital improvements identified in the Sewer Master Plan, the City's Public Works Department will prepare an updated nexus fee study to develop a fair share requirement in the form of a wastewater connection or similar project impact fee, which helps to pay for implementation of upgrades necessary to accommodate future development under the proposed Project, including development where deficiencies in the system are identified to exist. Through the fee study, subsequent cost recovery fees applied to individual future development projects will be based on a rough proportionality related to demands on the system reasonably attributed to the future development project. In the event it is determined that necessary upgrades to serve a project cannot be completed by the City prior to project completion, the City may require the developer to perform the necessary sewer infrastructure upgrades (Per BMC 8-1-304) at cost to the developer, or may choose to enter into a reimbursement agreement so that a developer may fund and construct the improvements within the necessary timeframe with subsequent partial reimbursement. If the City and Developer mutually agree to enter into reimbursement agreement (approved as to form by the City Attorney and approved by the City Council), it would be administered by the City's Public Works Director on behalf of the City.

UTIL-1e Prepare Updated Cost of Service and Rate Study and Update Sewer Service Charge if Warranted

The City's Public Works Department will prepare an updated cost of service and rate study to determine whether the Sewer Service Charge (SSC) imposed on new sewer connections resulting from future development under the proposed Project require updates to reflect the City's actual costs associated with providing sewer services. If such updates are warranted, the SSC will be updated to reflect actual costs of providing related sewer services.

Significance After Mitigation

Mitigation Measure UTIL-1a through UTIL-1e would address potential impacts related to the City's wastewater conveyance and treatment system, but would not reduce potential impacts to a level of less than significant due to the exceedance of the available wastewater treatment capacity at BWRP associated with future development under the proposed Project. Mitigation Measures UTIL-1a through UTIL-1c require preparation of plans to support long-term solutions and Mitigation Measures UTIL-1d and UTIL-1e may assist in partial funding of such long-term solutions. However, implementation of all capital improvements required to upgrade the City's wastewater conveyance and treatment system and expand capacity at BWRP are not expected to be fully funded or implemented until beyond the proposed Project's 10-year planning horizon, and thus the impacts related to wastewater systems would remain significant and unavoidable.

Determination

Significant and unavoidable impact related to wastewater systems. Impacts related to water supply, stormwater, telecommunication, electricity, and natural gas would be less than significant.

Threshold 2:	Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Impact UTIL-2 FUTURE DEVELOPMENT PROJECTS UNDER THE PROPOSED PROJECT WOULD REQUIRE AN INCREASE IN TEMPORARY RECYCLED WATER SUPPLIES DURING CONSTRUCTION AND AN INCREASE IN LONG-TERM WATER SUPPLY DURING OPERATION AND MAINTENANCE. GROWTH UNDER THE PROPOSED PROJECT IS ACCOUNTED FOR IN THE BWP 2020 URBAN WATER MANAGEMENT PLAN AND SUFFICIENT WATER SUPPLIES ARE AVAILABLE TO SERVE FUTURE DEVELOPMENT PROJECTS UNDER THE PROPOSED PROJECT. POTENTIAL IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Future development projects under the proposed Specific Plan would involve up to 9,702 new residential units, 3,986,207 square feet of commercial development, and 400 hotel rooms in the Specific Plan Area. Table 4.17-2 provides an overview of housing and employment growth projections from the City's 2020 UWMP, which were used to inform water demand and supply availability projections presented in the UWMP. As detailed in Section 4.17.2, Regulatory Setting, BWP based its 2020 UWMP water demand forecasts on the City's 2021-2029 Housing Element Update and the SCAG 2020-2045 RTP/SCS.

As shown in Table 4.17-2, the 2020 UWMP forecasted a total housing supply in Burbank of 58,401 units by the proposed Project's horizon year of 2035. As detailed in Table 4.12-4 in Section 4.12, *Population and Housing*, of this EIR, the addition of 9,702 new housing units under the proposed Project would increase the City's total housing units from 46,457 units in 2024[2] to 56,159 units in 2035. Therefore, the City's forecast of 56,159 housing units in 2035 under the proposed Project would be within the UWMP's forecast of 58,401 units in Burbank in 2035. As such, the 2020 UWMP accounts for water demands associated with future residential development projects under the proposed Project in its analysis of future housing projections.

[2] For the baseline conditions, in accordance with CEQA Guidelines Section 15125, "a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence" where necessary to provide the most accurate description of the existing conditions. As such, due to the preparation time needed to complete the Draft Specific Plan and Draft EIR, the Population and Housing section and this section utilizes 2024 population, housing, and employment data from the DOF.

Table 4.17-2 UWMP Housing and Employment Growth Projections

	2025	2030	2035	2040	2045
SCAG Housing Projections					
Single Family Housing Units	21,490	21,697	21,678	21,822	21,842
Multi-Family Housing Units	22,554	23,552	24,723	25,678	26,830
Housing Element Goals					
New Housing Units	4,000	10,088	12,000	12,000	12,000
Total Housing Units	**48,044**	**55,337**	**58,401**	**59,500**	**60,672**
SCAG Employment Projections	122,652	128,544	134,669	137,027	138,614

Source: BWP 2021

As with the residential components of the proposed Project, the SCAG projections assessed in the City's 2020 UWMP also account for future non-residential land uses that are also included under the proposed Project. As shown in Table 4.17-2, the 2020-2045 SCAG RTP/SCS forecasted a total of 134,669 jobs by the proposed Project's horizon year of 2035. As detailed in Table 4.12-5 in Section 4.12, *Population and Housing*, of this EIR, the addition of 3,986,207 square feet of commercial and business development uses under the proposed Project would increase the City's total employment from 127,800 jobs in 2024 to 135,601 jobs in 2035. Thus, the jobs generated by the proposed Project would result in exceedance of the SCAG 2020-2045 RTP/SCS forecast of 932 jobs, or approximately 0.7 percent. Although the total number of jobs in Burbank under the proposed Project would exceed the SCAG estimate by 0.7 percent, this exceedance is not considered substantial. As detailed below, BWP planned for water supply reliability through implementation of conservation programs and water supply projects. These water reliability strategies would be utilized to ensure that this 0.7 percent exceedance of the SCAG 2020-2045 RTP/SCS employment forecast would not substantially affect BWP's water supply. Therefore, the water demand projections in the City's 2020 UWMP account for future water demands associated with both residential and non-residential land uses facilitated by the proposed Project.

Table 4.17-3 through Table 4.17-9, below, provide an overview of BWP's anticipated water demands and supplies over the planning horizon in average, single dry, and multiple dry year conditions as reported in its 2020 UWMP.

Table 4.17-3 BWP Normal Year Supply and Demand Comparison

	Year				
Use Type	**2025**	**2030**	**2035**	**2040**	**2045**
Potable					
Supply Total	18,062	20,380	21,386	21,712	22,010
Demand Total	18,062	20,380	21,386	21,712	22,010
Difference	**0**	**0**	**0**	**0**	**0**
Non-Potable					
Supply Total	10,340	10,340	10,340	10,340	10,340
Demand Total	10,340	10,340	10,340	10,340	10,340
Difference	**0**	**0**	**0**	**0**	**0**

Source: BWP 2021

Table 4.17-4 BWP Single Dry Year Supply and Demand Comparison

	Year				
Use Type	**2025**	**2030**	**2035**	**2040**	**2045**
Potable					
MWD Treated Potable	*7,334*	*9,640*	*10,628*	*10,925*	*11,222*
Supplier-Produced GW	*10,655*	*10,658*	*10,672*	*10,700*	*10,700*
Supply Total	17,989	20,298	21,300	21,625	21,922
Demand Total	17,989	20,298	21,300	21,625	21,922
Difference	**0**	**0**	**0**	**0**	**0**
Non-Potable					
MWD Replenishment	*6,800*	*6,800*	*6,800*	*6,800*	*6,800*
Recycled Water	*3,540*	*3,540*	*3,540*	*3,540*	*3,540*
Supply Total	10,340	10,340	10,340	10,340	10,340
Demand Total	10,340	10,340	10,340	10,340	10,340
Difference	**0**	**0**	**0**	**0**	**0**

MWD = Metropolitan Water District of Southern California; GW = groundwater

Source: BWP 2021

Table 4.17-5 BWP Multiple Dry Year Supply and Demand Comparison – Year 1

	Year				
Use Type	**2025**	**2030**	**2035**	**2040**	**2045**
Potable					
MWD Treated Potable	*7,559*	*10,072*	*11,021*	*11,411*	*11,706*
Supplier-Produced GW	*10,655*	*10,658*	*10,672*	*10,700*	*10,700*
Supply Total	18,214	20,730	21,693	22,111	22,406
Demand Total	18,214	20,730	21,693	22,111	22,406
Difference	**0**	**0**	**0**	**0**	**0**
Non-Potable					
MWD Replenishment	*6,800*	*6,800*	*6,800*	*6,800*	*6,800*
Recycled Water	*3,540*	*3,540*	*3,540*	*3,540*	*3,540*
Supply Total	10,340	10,340	10,340	10,340	10,340
Demand Total	10,340	10,340	10,340	10,340	10,340
Difference	**0**	**0**	**0**	**0**	**0**

MWD = Metropolitan Water District of Southern California; GW = groundwater

Source: BWP 2021

Table 4.17-6 BWP Multiple Dry Year Supply and Demand Comparison – Year 2

	Year				
Use Type	**2025**	**2030**	**2035**	**2040**	**2045**
Potable					
MWD Treated Potable	*7,945*	*10,277*	*11,021*	*11,472*	*11,706*
Supplier-Produced GW	*10,655*	*10,658*	*10,672*	*10,700*	*10,700*
Supply Total	18,600	20,935	21,693	22,172	22,406
Demand Total	18,600	20,935	21,693	22,172	22,406
Difference	**0**	**0**	**0**	**0**	**0**
Non-Potable					
MWD Replenishment	*6,800*	*6,800*	*6,800*	*6,800*	*6,800*
Recycled Water	*3,540*	*3,540*	*3,540*	*3,540*	*3,540*
Supply Total	10,340	10,340	10,340	10,340	10,340
Demand Total	10,340	10,340	10,340	10,340	10,340
Difference	**0**	**0**	**0**	**0**	**0**

MWD = Metropolitan Water District of Southern California; GW = groundwater

Source: BWP 2021

Table 4.17-7 BWP Multiple Dry Year Supply and Demand Comparison – Year 3

	Year				
Use Type	**2025**	**2030**	**2035**	**2040**	**2045**
Potable					
MWD Treated Potable	*8,331*	*10,481*	*11,021*	*11,532*	*11,706*
Supplier-Produced GW	*10,655*	*10,658*	*10,672*	*10,700*	*10,700*
Supply Total	18,986	21,139	21,693	22,232	22,406
Demand Total	18,986	21,139	21,693	22,232	22,406
Difference	**0**	**0**	**0**	**0**	**0**
Non-Potable					
MWD Replenishment	*6,800*	*6,800*	*6,800*	*6,800*	*6,800*
Recycled Water	*3,540*	*3,540*	*3,540*	*3,540*	*3,540*
Supply Total	10,340	10,340	10,340	10,340	10,340
Demand Total	10,340	10,340	10,340	10,340	10,340
Difference	**0**	**0**	**0**	**0**	**0**

MWD = Metropolitan Water District of Southern California; GW = groundwater

Source: BWP 2021

Table 4.17-8 BWP Multiple Dry Year Supply and Demand Comparison – Year 4

	Year				
Use Type	**2025**	**2030**	**2035**	**2040**	**2045**
Potable					
MWD Treated Potable	*8,718*	*10,686*	*11,219*	*11,593*	*11,706*
Supplier-Produced GW	*10,655*	*10,658*	*10,672*	*10,700*	*10,700*
Supply Total	19,373	21,344	21,891	22,293	22,406
Demand Total	19,373	21,344	21,891	22,293	22,406
Difference	**0**	**0**	**0**	**0**	**0**
Non-Potable					
MWD Replenishment	*6,800*	*6,800*	*6,800*	*6,800*	*6,800*
Recycled Water	*3,540*	*3,540*	*3,540*	*3,540*	*3,540*
Supply Total	10,340	10,340	10,340	10,340	10,340
Demand Total	10,340	10,340	10,340	10,340	10,340
Difference	**0**	**0**	**0**	**0**	**0**

MWD = Metropolitan Water District of Southern California; GW = groundwater

Source: BWP 2021

Table 4.17-9 BWP Multiple Dry Year Supply and Demand Comparison – Year 5

	Year				
Use Type	**2025**	**2030**	**2035**	**2040**	**2045**
Potable					
MWD Treated Potable	*9,104*	*10,891*	*11,286*	*11,654*	*11,706*
Supplier-Produced GW	*10,655*	*10,658*	*10,672*	*10,700*	*10,700*
Supply Total	19,759	21,549	21,958	22,354	22,406
Demand Total	19,759	21,549	21,958	22,354	22,406
Difference	**0**	**0**	**0**	**0**	**0**
Non-Potable					
MWD Replenishment	*6,800*	*6,800*	*6,800*	*6,800*	*6,800*
Recycled Water	*3,540*	*3,540*	*3,540*	*3,540*	*3,540*
Supply Total	10,340	10,340	10,340	10,340	10,340
Demand Total	10,340	10,340	10,340	10,340	10,340
Difference	**0**	**0**	**0**	**0**	**0**

MWD = Metropolitan Water District of Southern California; GW = groundwater

Source: BWP 2021

Table 4.17-3 through Table 4.17-9 above show that BWP can adequately meet water demands within its service area with identified supplies over a 20-year planning horizon under normal-year, single dry-year, and multiple dry-year conditions. This is partly due to the effectiveness of conservation programs implemented throughout the planning period. The projections shown above for imported surface and ground water supply availability indicate that sufficient supplies are available to meet the projected demands. These projections are based upon the BWP 2020 UWMP which reflects

forecasted population growth, as detailed above, as well as additional supplies associated with expansion of BWP's current water supply portfolio through increased conservation and conjunctive use management efforts. Since BWP water demands are accounted for in the supply availability projections identified above, and with consideration to BWP's access to local groundwater supplies and recycled water supplies, both of which are expected to increase over time, it is reasonably anticipated that sufficient water supply is available for the proposed Project demands, even with the 0.7 percent exceedance of the 2020 UWMP's non-residential growth forecasts.

As noted in the City's UWMP, future development projects that meet the definition of "project" in the California Water Code as amended by Senate Bill 610 are required to develop a project-specific WSA. The proposed Project is subject to CEQA and includes more than 500 dwelling units; however, as a planning document, not a development project, it does not directly trigger the need for a WSA as defined by the California Water Code. Nonetheless, a WSA was prepared to analyze the potential impacts associated with future development under the proposed Project, and for the purpose of providing a well-informed analysis of potential impact of water supply availability and reliability over the horizon year of the proposed Project. The WSA, which was prepared by Rincon Consultants in May 2025, in accordance with the California Water Code, is provided as Appendix J. According to the WSA, the residential, non-residential, and hotel development under the proposed Project at buildout would result in an overall demand of approximately 2.4 million gallons per day (gpd), or 2,689 AFY (Appendix J). As discussed above, BWP's 2020 UWMP accounts for the water demands associated with future development under the proposed Project. Therefore, because water demands of the proposed Project are accounted for in the 2020 UWMP, and the 2020 UWMP forecasts no supply shortages through 2045, BWP has sufficient water supply available to meet the potential demands of the proposed Project under normal year, single dry year, and multiple dry year conditions.

In addition to the anticipated sufficiency and reliability of existing and planned water supplies in Burbank, BWP and Metropolitan are actively developing and implementing water supply-related projects that further bolster the reliability of future water supplies. These projects include but are not limited to: an increase of up to 200 AFY of expanded water recycling activities at BWRP; development of North Hollywood Operable Unit wells for expanded potable reuse supplies at the Burbank Operable Unit; and a feasibility study to assess opportunities for indirect potable reuse / direct potable reuse, thereby further bolstering available future supplies (BWP 2021). Through these efforts, BWP anticipates that recycled water will play an integral role in future water supplies.

In summary, BWP can adequately meet water demands within its service area with identified supplies over a 20-year planning horizon under normal-year, single dry-year, and multiple dry-year conditions. In addition, BWP and Metropolitan have identified potential future supply sources to augment water supplies and further insulate the region from hydrological uncertainty. Therefore, sufficient water supplies are available to serve reasonably foreseeable development under the proposed Project, including reasonably foreseeable future development during normal (water year), dry-year, and multiple-dry-year (drought) conditions. Impacts would be less than significant.

Determination

Less than significant impact

Threshold 3:	Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Impact UTIL-3 WASTEWATER GENERATED IN THE CITY OF BURBANK IS CONVEYED TO AND TREATED AT THE BURBANK WATER RECLAMATION PLANT (BWRP). FUTURE DEVELOPMENT PROJECTS UNDER THE PROPOSED PROJECT WOULD INCREASE WASTEWATER GENERATION COMMENSURATE WITH THE INCREASED POPULATION, WHICH WOULD RESULT IN ADDITIONAL WASTEWATER FLOWS THAT WOULD EXCEED THE EXISTING CAPACITY OF THE BWRP. DUE TO THESE FLOWS, AND THE CONSTRAINTS WITHIN THE CITY'S TREATMENT SYSTEM, POTENTIALLY SIGNIFICANT IMPACTS COULD RESULT IF THE FULL BUILDOUT OF THE PROPOSED PROJECT IS REALIZED, AND WOULD REQUIRE SUBSTANTIAL FACILITY IMPROVEMENTS TO ACCOMMODATE THIS ADDITIONAL WASTEWATER FLOW. SHORT- AND LONG-TERM MITIGATION MEASURES ARE REQUIRED TO REDUCE THE POTENTIAL IMPACTS AND ENSURE UPGRADES TO THE SYSTEM. NONETHELESS, NECESSARY IMPROVEMENTS TO ACCOMMODATE THIS ADDITIONAL WASTEWATER FLOW ARE NOT EXPECTED TO BE COMPLETED WITHIN THE 10-YEAR PLANNING HORIZON. THEREFORE, IMPACTS WOULD REMAIN SIGNIFICANT AND UNAVOIDABLE UNTIL THE PLANS AND UPGRADES ARE IMPLEMENTED.

As discussed in Section 4.17.1(b), all wastewater generated in the City of Burbank is conveyed via sewer laterals to the sewer mainline, which conveys wastewater to the BWRP for treatment and reuse as applicable. Wastewater flows to the BWRP which currently has limited remaining capacity with the ability to treat sewer inflows at an average rate of approximately 8.5 MGD (Appendix H). Public Works is responsible for maintaining, replacing, and upgrading the City's sewer collection and treatment system. Public Works conducts repairs and upgrades as necessary to accommodate the wastewater conveyance and treatment demands throughout the City. As specific development projects are proposed and evaluated, General Plan Land Use Element Policy 2.3 would require developers to pay their fair share for infrastructure improvements as needed to serve their project, and ensure that needed infrastructure and services are available prior to or at project completion, this may include the requirement that the developer pays for and performs the necessary sewer infrastructure upgrades, per BMC 8-1-304.

However, as discussed in Impact UTIL-1, based on the Focused Sewer Capacity Analysis (Appendix H), the additional wastewater flows generated by development under the proposed Project would result in approximately 3.07 MGD of wastewater inflows to the BWRP which would account for approximately 36 percent of the current BWRP daily rate of 8.5 MGD. Therefore, the proposed Project would result in additional wastewater flows that would account for a large portion of the existing daily rate of the BWRP and would exceed the existing limited remaining capacity, which would require substantial facility improvements to accommodate this additional wastewater flow and impacts would be potentially significant.

Additional capital improvement projects would be required to increase BWRP capacity to handle the majority of future flows from the proposed Project. During certain periods when the capacity enhancements would be constructed at BWRP, it may be necessary to divert flow to the City of Los Angeles' North Outfall Sewer pipeline (LA NOS). However, long-term diversion to the LA NOS is not feasible due to regulatory and contractual constraints, as well as the increased diversion cost, which would include both sewer facilities charges and annual charges and is estimated to be approximately $60 million over ten years. Potential future improvements to increase the treatment capacity of the BWRP would require upgrades to the headworks, the addition of new primary clarifiers, modifications to the secondary treatment process, and expansion of the equalization basins (beyond the near-term 10-year planning horizon). Options for improving BWRP's secondary treatment processes could include either conversion to a membrane bioreactor or expansion of the BWRP's conventional

secondary treatment facilities. BWRP's tertiary sand filters and chlorine contact tanks have relatively more capacity than the expansion processes listed above and are currently not the limiting processes in the treatment train. Additionally, BWRP expansion would likely require the City to acquire new land to build some of these improvements due to limited space in the current BWRP property. (Refer to Appendix H)

Although the City's Public Works Department determined that these necessary improvements would not be completed within the 10-year horizon due to high costs and operational challenges during construction of improvements, Mitigation Measures UTIL-1a through UTIL-1d will require the Public Works Department to prepare plans and studies to identify specific capacity constraints, develop a capital improvement program to address those constraints, and conduct studies to determine appropriate fees that will financially assist to support implementation of these necessary improvements. Additional mitigation measures may be implemented in the near-term to support the longer-term upgrades to BWRP, including planning for the upgrades identified in the Focused Sewer Capacity Analysis and annually reviewing the City's capital improvement program to ensure consistency with the City's adopted general plan.

Nonetheless, BWRP's capacity will not be sufficient to support full buildout of the proposed Project until all capital improvement upgrades are completed. Until such upgrades are implemented, impacts to the City's wastewater treatment capacity from the proposed Project will be significant and unavoidable.

Mitigation Measures

Mitigation Measures UTIL-1a through UTIL-1e would address potential impacts related to the City's wastewater conveyance system and assist in long-term planning to address capacity issues at BWRP. Mitigation Measures UTIL-3a and 3b would further reduce long-term impacts by requiring implementation of infrastructure capacity and conveyance expansion and upgrades as needed by the infrastructure plans for long-term solutions, and by ensuring annual consistency of the City's capital improvement program with the City's adopted general plan.

UTIL-3a Expansion and Upgrades to BWRP Treatment Facilities

The City's Public Works Department shall plan for and complete future improvements to expand and upgrade the BWRP treatment facilities consistent with the Focused Sewer Capacity Analysis and forthcoming Sewer Constraints Analysis and Sewer Master Plan, including but not limited to, upgrades to the headworks, the acquisition of land adjacent to the BWRP facilities, the addition of new primary clarifiers, expansion of the equalization basins, modifications to the secondary treatment process, and upgrades to other parts of the sewage treatment process.

UTIL -3b Capital Improvement Program and Alignment with the City's General Plan

On an annual basis, the City's Community Development Department, acting by and through the City Planner or the City Planning Commission, shall review the Citywide Capital Improvement Program to ensure its conformity with the City's adopted general plan.

Significance After Mitigation

Mitigation Measures UTIL-3a and UTIL-3b would directly address potential impacts related to the City's wastewater treatment system capacity by planning for and completing necessary long-term upgrades to the BWRP and Mitigation Measures UTIL-1a through UTIL-1e would assist in the near-

term planning efforts required to mitigate such potential impacts. Nevertheless, complete implementation of the necessary upgrades to the BWRP is roughly estimated to take up to 22 years to finance and complete, which is well beyond the proposed Project's 10-year planning horizon. As a result, the impacts related to wastewater treatment capacity associated with the proposed Project would remain significant and unavoidable.

Determination

Significant and unavoidable impact

Threshold 4:	Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Impact UTIL-4 SOLID WASTE GENERATED WITHIN THE SPECIFIC PLAN AREA WOULD BE TRANSPORTED TO BURBANK LANDFILL SITE NO. 3, SUNSHINE CANYON LANDFILL, SIMI VALLEY LANDFILL & RECYCLING CENTER, AND ANTELOPE VALLEY PUBLIC LANDFILL WHICH HAVE ADEQUATE REMAINING CAPACITY TO ACCOMMODATE THE PROPOSED PROJECT. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The City of Burbank Street and Solid Waste Division collects, transports, and disposes of solid waste, green waste, organics, recyclables, and bulky items. Businesses and larger multifamily residences can use City solid waste and recycling services or hire a private waste collection and hauling company. As detailed under the environmental setting, solid waste generated within the City, including the Specific Plan Area, is disposed of at Burbank Landfill Site No. 3, Sunshine Canyon Landfill, Simi Valley Landfill & Recycling Center, and Antelope Valley Public Landfill (CalRecycle 2025b)[3]. Table 4.17-1 summarizes the maximum daily throughputs and remaining capacities of the landfills serving the Specific Plan Area.

Development accommodated by the proposed Project would generate both construction and operational solid waste that would be dispose of at Burbank Landfill Site No. 3, Sunshine Canyon Landfill, Simi Valley Landfill & Recycling Center, Antelope Valley Public Landfill, and other collection centers. Solid waste generated by approximately 9,702 residential units and 3,986,207 square feet of commercial and general business development, and 400 hotel rooms, which would contribute to the overall capacity of these facilities. According to the CalEEMod results (Appendix C), future development projects under the proposed Project would generate approximately 16,000 tons of solid waste per year, or 61.5 tons per day on average[4]. The average daily solid waste generated by the proposed Project would account for approximately 26 percent of the maximum permitted daily intake of 240 tons per day for Burbank Landfill Site No 3. The average daily solid waste generated by the proposed Project would account for less than one percent of the maximum permitted daily intake of 12,100 tons per day for Sunshine Canyon Landfill. Additionally, the average daily solid waste generated by the proposed Project would account for less than 0.1 percent of the maximum permitted daily intake of 64,750 tons per day for Simi Valley Landfill & Recycling Center. Finally, the average daily solid waste generated by the proposed Project would account for approximately one percent of the maximum permitted daily intake of 5,548 tons per day for Antelope Valley Public Landfill. Therefore, the proposed Project would not account for a substantial portion of the maximum

[3] As of 2019, solid waste in Burbank was primarily disposed of at Chiquita Canyon Sanitary Landfill in Castaic. However, on January 1, 2025, Chiquita Canyon Sanitary Landfill is closed for the acceptance of solid waste due to regulatory compliance incidents related to elevated temperatures at the landfill (CalRecycle 2025b; Appendix I).

[4] Average daily disposal quantities are based on 260 days (5 days per week, average, based on operational hours for the City's solid waste services).

permitted daily intakes of the landfills serving the City and the proposed Project would not result in the generation of solid waste in excess of the capacity of local solid waste infrastructure.

Based upon the existing capacity of landfills available to the City, the solid waste generated by future development under the proposed Project would not require the development of new or expanded solid waste facilities but, over time, would contribute to the need for new or expanded solid waste facilities as other municipalities expand their residential and non-residential development.

Development projects under the proposed Project would generate solid waste, including construction debris. The handling of all debris and waste generated during construction of development projects under the proposed Project would be subject to CALGreen requirements and the California Integrated Waste Management Act of 1989 (AB 939) requirements for salvaging, recycling, and reuse of materials from construction activities. In accordance with CALGreen requirements, development projects under the proposed Project would be required to achieve a minimum of 65 percent diversion rate for construction waste. In addition, development projects under the proposed Project would be required to comply with federal, State, and local statutes and regulations related to solid waste, such as AB 939 and the City's recycling programs. Therefore, the proposed Project would not generate solid waste in excess of State or local standards or otherwise impair the attainment of solid waste reduction goals. Potential impacts would be less than significant.

Determination

Less than significant impact

4.17.4 Cumulative Impacts

The geographic extent of cumulative analysis for utilities and service systems is the City of Burbank, particularly areas of anticipated development under the Downtown Burbank Transit Oriented Development (TOD) Specific Plan (a consolidation and update of the North San Fernando Boulevard Master Plan and the Burbank Center Plan) and the Golden State Specific Plan (GSSP), as described in Section 3, *Environmental Setting*. As described in Section 3, *Environmental Setting,* the Downtown TOD Specific Plan would facilitate development of up to 9,944 residential units and 6,083,657 square feet of commercial and business development land uses; and the GSSP would facilitate development of up to 7,205 residential units and 3,149,623 square feet of commercial and business development land uses. Cumulative impacts may occur if impacts of the proposed Project combine with similar impacts of other projects in the cumulative scenario.

Water Supply

The WSA prepared for the proposed Project estimated that cumulative water demands of the Downtown TOD Specific Plan, GSSP, and the proposed Project would be 8,476 AFY. This forecasted cumulative water demand would account for 30.1 percent of the City's total water demand in the horizon year of 2035. Although the cumulative water demand would account for 30.1 percent of the City's total water demand, the total water demand is based on the forecasted total housing supply in Burbank of 58,401 units by the cumulative projects' horizon year of 2035. Under the cumulative scenario, housing growth under the Downtown TOD Specific Plan, the GSSP, and the proposed Project would increase the City's total housing units by 26,851 housing units from 46,457 units in 2024 to 73,308 units in 2035. Thus, housing growth under the Downtown TOD Specific Plan, the GSSP, and the proposed Project would exceed the forecasted housing supply of 58,401 units by 14,907 units in 2035 and the housing growth under the cumulative scenario would not be accounted for under the 2020 UWMP. Therefore, there are not sufficient water supplies available to serve future development

projects under the proposed Project and the two aforementioned Specific Plans for water supply during normal year, dry year, and multiple dry-year conditions. Impacts would be significant and unavoidable due to insufficient water supplies and development under the proposed Project would contribute to a cumulatively significant impact associated with water supply.

Wastewater

As discussed under UTIL-1 and UTIL-3 above, new wastewater service connections would be installed as needed, on a project-specific basis; this would occur for developments within the cumulative scenario as it would for developments under the proposed Project. Based on the Focused Sewer Capacity Analysis (Appendix H), the additional wastewater flows generated by development under the proposed Project, Downtown TOD Specific Plan, and GSSP would result in approximately 9.21 MGD of wastewater inflows to the BWRP which would account for approximately 108 percent of the current BWRP daily rate of 8.5 MGD. Therefore, the proposed Project, Downtown TOD Specific Plan, and GSSP would result in additional wastewater flows that would exceed the existing daily rate of the BWRP and would exceed the existing limited remaining capacity, which would require substantial facility improvements to accommodate this exceedance.

Potential future improvements to increase the treatment capacity of the BWRP would require upgrades to the headworks, the addition of new primary clarifiers, modifications to the secondary treatment process, and expansion of the equalization basins (beyond the near-term 10-year planning horizon). Due to limited space at BWRP, and the inter-reliability of the treatment train processes, upgrades to expand BWRP capacity to accommodate any additional inflows would require substantial facility improvements. To expand the existing BWRP capacity to accommodate the estimated average additional sewer flow for the proposed Project, Downtown TOD Specific Plan, and GSSP of approximately 9.5 MGD would require additional BWRP upgrades to the headworks, primary clarifiers, equalization basins, aeration basins/blowers, secondary clarifiers, filters, and chemical treatment (chlorine contact tanks). Furthermore, improvements for the proposed Project, Downtown TOD Specific Plan, and GSSP would require the acquisition of approximately 48,000 square feet of additional property to expand the footprint of the existing BWRP. Finally, the preliminary cost estimates to expand the BWRP to treat the proposed Project, Downtown TOD Specific Plan, and GSSP, including acquiring the required additional property, are approximately 430 million dollars. These larger improvements for the proposed Project in combination with the other two specific plans are estimated to require approximately 22 years to implement, which is well beyond the proposed Project's 10-year planning horizon.

Therefore, impacts would be significant and unavoidable due to constraints within the sewer system and development under the proposed Project would contribute to a cumulatively significant impact associated with wastewater generation.

Stormwater

The geographic extent of the cumulative analysis for the topic of stormwater includes the entire City of Burbank because the Public Works Department and LACFCD operates and maintain the Citywide stormwater conveyance system. Non-residential projects in the cumulative scenario would introduce project-specific needs for stormwater conveyance that would be reviewed and permitted on a project-by-project basis by the City. Due to the extensive built-up nature of the City, new development is not anticipated to introduce substantial new areas of impervious surfaces, such that substantial expansion of existing stormwater conveyance infrastructure would be necessary. Additionally, development under the cumulative Specific Plans would be required to comply with

regulations and standards related to stormwater in the BMC and would be required to incorporate LID methods, similar to the proposed Project. Therefore, development under the proposed Project would not contribute to cumulatively significant impact, and potential cumulative impacts associated with stormwater would be less than significant.

Solid Waste

Future development accommodated by the proposed Project, Downtown TOD Specific Plan, and the GSSP would generate both construction and operational solid waste that would be disposed of at Burbank Landfill Site No. 3, Sunshine Canyon Landfill, Simi Valley Landfill & Recycling Center, Antelope Valley Public Landfill, and other collection centers. As detailed under Impact UTIL-4, the proposed Project would account for 26 percent of Burbank Landfill No. 3's maximum daily throughput and one percent or less of Sunshine Canyon Landfill's, Simi Valley Landfill & Recycling Center's, and Antelope Valley Public Landfill's individual maximum daily throughputs. While the Downtown TOD Specific Plan and the GSSP would generate additional solid waste that would be disposed of at these solid waste facilities, it is anticipated that each of these cumulative projects would introduce similar levels of solid waste compared to the proposed Project. Thus, it is anticipated that the additional solid waste generated by these cumulative projects would be accommodated by the Burbank Landfill Site No. 3, Sunshine Canyon Landfill, Simi Valley Landfill & Recycling Center, Antelope Valley Public Landfill, and other collection centers in Southern California. Similar to the proposed Project, cumulative projects would be required to ensure that these solid waste collection centers would have sufficient capacity to serve the development associated with the cumulative projects. Therefore, development under the proposed Project would not contribute to a cumulatively significant impact, and potential cumulative impacts associated with solid waste would be less than significant.

Telecommunications, Electricity, and Natural Gas

The geographic extent of cumulative analysis for telecommunications, electricity, and natural gas includes the entire service territories of the providers for each of these utilities.

Telecommunications

Telecommunications services in Burbank are provided by private companies, including AT&T, EarthLink, and Spectrum, among others, and telecommunications facilities are generally available throughout the City. Connections for new telecommunications services are implemented on an as-needed basis, and the service provider used is generally at the discretion of the customer. Future development accommodated by the proposed Project, Downtown TOD Specific Plan, and GSSP would establish telecommunications service connections in the same manner as developments under the proposed Project. There are no anticipated limitations to the availability of telecommunications service. Potential cumulative impacts associated with telecommunications would be less than significant.

Electricity

Electric power supply throughout the City is provided by BWP. As with the proposed Project, future development accommodated by the Downtown TOD Specific Plan and GSSP would require electric service and would be connected to electricity through BWP.

As detailed in Section 4.17.1, *Setting*, BWP operates two 12kV distribution substations and two customer substations to serve the Specific Plan Area. BWP is in the process of determining the most effective methods to increase its system interconnection capacity to account for this cumulative

growth, which may include new connections with Southern California Edison and LADWP. In addition to distribution substations, new sub-transmission and distribution facilities would be required to be installed to and from the distribution substations including overhead infrastructure (i.e., poles, wires, etc.) and underground infrastructure (i.e., conduits, cables, manholes, pull boxes, padmount transformers, padmount switches, etc.). As described under UTIL-1, project proponents of future development projects under the Downtown TOD Specific Plan and GSSP would be responsible for contributing their fair share of electrical on-site improvements, related off-site improvements, and substation capacity based on the electrical demand for the future project, as required by BWP, Title 8, Chapter 2 of the BMC, and Burbank2035 Land Use Element Policy 2.3. It is anticipated that installation of distribution substations and new sub-transmission and distribution facilities would be subject to CEQA review at the time a specific design is proposed.

BWP determined that build out of the proposed Project, the Downtown TOD Specific Plan, and GSSP would demand a total additional demand of 81 MW for residential development and 83 MW for commercial development, totaling 164 MW of additional electrical demand. As described under UTIL-1, BWP has a limitation of 450 MW at the existing system interconnection with LADWP, but may also elect to operate the 40 MW Lake Generating Unit[5] to serve system capacity needs, bringing the potential available system capacity to 490 MW (Appendix K). Considering BWP's all-time peak of 322 MW and the additional forecasted load growth associated with Citywide planned development of 99 MW, BWP is forecasting a new system peak of 421 MW. This would result in approximately 69 MW of remaining capacity to serve developments under the proposed Project, the Downtown TOD Specific Plan, and the GSSP and any anticipated ambient growth[6] prior to 2035, before additional interconnection capacity would be necessary. Therefore, under the cumulative scenario the additional electrical demand of 164 MW would exceed BWP's remaining electrical capacity of 69 MW and would require substantial system interconnection capacity increase to accommodate this substantial additional electricity demand. Therefore, development under the proposed Project would contribute to a cumulatively significant impact, and potential cumulative impacts associated with electricity would be significant and unavoidable.

Natural Gas

Future development accommodated by the proposed Project, Downtown TOD Specific Plan, and the GSSP would cumulatively increase demand for natural gas. However, as discussed above, the current trend of energy efficient practices, increased use of renewable power, and a decreased use of natural gas would further reduce future energy demands. Future development projects under the proposed Project, Downtown TOD Specific Plan, and the GSSP would be required to adhere to existing state and local requirements related to natural gas. New or expanded facilities for the transmission and distribution of natural gas may be needed to meet increased Citywide demand. Impacts associated with the construction of new facilities would generally be localized and involve temporary construction impacts. Therefore, development under the proposed Project would not contribute to a cumulatively significant impact, and potential cumulative impacts associated with natural gas would be less than significant.

[5] The Lake Generating Unit is typically relied upon during summer peak days or when the Magnolia Power Plant is down for maintenance. Given that this generating unit is a tertiary backup to the Magnolia Power Plant and the LADWP interconnection, this generating capacity can be relied upon to provide base capacity in BWP's electric system. It should be noted that emissions limitations coupled with cost limitations may impact the use of this generating unit.

[6] It is anticipated that ambient growth from housing activity, which includes new single-family homes, and mixed-use developments outside of the specific plans could be between 50 to 100 units per year or between 500 to 1,000 dwelling units.

4.18 Wildfire

This section evaluates the potential environmental impacts related to wildfire with the implementation of the proposed Project. Specifically, this section reviews the proposed Project's impact related to emergency response plans, exacerbation of wildfire risks related to slope or prevailing winds, installation of infrastructure that may exacerbate fire risk, and exposure of people to downslope flooding or landslides.

4.18.1 Setting

a. Wildfire Fundamentals

A wildfire is an uncontrolled fire in an area of extensive combustible fuel, including vegetation and structures. Wildfires differ from other fires in that they take place outdoors in areas of grassland, woodlands, brushland, scrubland, peatland, and other wooded areas that act as a source of fuel, or combustible material. Buildings may become involved if a wildfire spreads to adjacent communities. The primary factors that increase an area's susceptibility to wildfire include slope and topography, vegetation type and condition, and weather and atmospheric conditions. Regions of dense dry vegetation, particularly in canyon areas and on hillsides, pose the greatest potential for wildfire risks. Additional factors that increase an urban area's susceptibility to wildfire are development patterns and density, building types, and building materials.

The effects of wildland fires can be catastrophic. In addition to stripping the land of vegetation and destroying natural resources, post-fire conditions leave exposed slopes and hillsides vulnerable to surface erosion and runoff. Soil exposed to intense heat may lose its capacity to absorb moisture and support life. Debris flows during post-fire rainy seasons can pose a risk to life and property and occur with little warning. In Southern California, as little as 0.3 inch of rain in 30 minutes can produce debris flows on post-fire landscapes (United States Geological Survey 2018). Wildfires also have negative impacts on air quality. Exposure to smoke and particulate matter has immediate and long-term public health impacts; populations may suffer from eye irritations, respiratory problems, and complications to existing lung and heart conditions.

Wildfire has three basic elements: how and where its ignition occurred; how and why it moves across a landscape from its point of origin; and what the fire's nature is upon arrival at a location. In general, a fire's nature is defined by eight characteristics:

- Direction of the advance of the fire front
- Speed of the advance of the fire front (rate of spread)
- Mechanism causing the advance
- Duration at any one location
- Structure-related consumption of fuels
- Flame length
- Intensity
- Gaining control

A fire front's direction of travel is primarily determined by direction of prevailing winds, geographic aspect, and condition of the fuels in the advance direction of the fire. The speed of a fire front's advance is a result of conditions at the site of the currently burning material and of lands in the

advance direction of the fire. As a fire advances, the overriding influences determining its speed are prevailing wind speed, terrain slope gradient, dominant fuel size classes, and fuel continuity.

Wildfires advance by two principal mechanisms: combustion resulting from radiant heating and remote ignition resulting from ember production. Grass formations are dominated by low volumes of very "fine" fuels and, depending on the level of dryness, can be consumed, with the fire advancing, in a matter of minutes. On the other hand, tree-dominated vegetation has significantly greater volumes of available fuel and a far greater amount of larger-sized fuel components. Fires can remain at these locations for days, often weeks, and sometimes months (on heavily-wooded conifer sites).

Fires burn where fuels are available. Fires in grasslands burn at a level set by the height of the grass, while fires in brushlands can burn surface fuels and typically consume the stems and leafy crowns to the full height of the plants. Fires in tree-dominated vegetation have a much more complex pattern of movement based primarily on the continuity (or "connectedness") of the fuels. In these stands, there are typically three distinct layers of fuels, arranged vertically: surface, stems and trunks, and the crown, which is composed of branches, twigs, and leaves. The continuity of fuels is important to consider in both horizontal and vertical directions. If a fire enters a stand and is advancing only as a surface fire, it will continue this manner of advance if there is high horizontal fuel connectivity. However, if there is also a high degree of vertical continuity (provided by fuels referred to as "ladder fuels"), then a fire can move up into the crown, as well as forward across the surface, involving fuels in the entire stand structure.

Flame lengths are generally determined by the volume of fuels burning, the amount of time to total consumption, and the height of the species in the composition. Grassland produces flame lengths typically ranging from one to three feet as they are composed of low volumes of fine materials that are consumed quickly. Flame lengths are at their maximum when the material is dry. Stands of brush can produce flame lengths from four to 10 feet. Native oak-dominated hardwood stands can generate 20- to 40-foot flame lengths, and stands of exotics, such as *Eucalyptus globulus* or *E. cinerea*, or dense conifer stands can generate flame lengths over 100 feet. Flame length is important because it sets the distance over which radiant heating-related combustion can occur.

The temperature achieved in a wildfire is directly related to the amount of cellulosic material available for consumption. Grasslands have very low amounts and attain lower temperatures, but woodlands, characterized by large amounts of highly concentrated cellulosic material, can attain temperatures on the order of 1,800 degrees Fahrenheit.

Gaining control over a wildfire's behavioral character is the objective of response efforts. Grassland fires, burning in low fuel volume, rapid consumption, and at a single level, are the easiest to bring under control. On the other end, fires that are burning in high fuel volumes, full spectrum size classes, and entire stand structure involvement can require days, weeks, or even months to bring under complete control.

Wildland-Urban Interface

The Wildland Urban Interface (WUI) is the area where human development meets wildland vegetation, and it is typically characterized by a mix of residential, commercial, and natural land uses. The California Department of Forestry and Fire Protection (CAL FIRE) uses a combination of housing density, Fire Hazard Severity Zone (FHSZ) classification, and vegetation lifeform criteria for mapping WUIs as part of their Fire and Resource Assessment Program. The WUI is particularly vulnerable to wildfire because it combines the presence of human-built structures with the presence of combustible

vegetation and other wildfire fuels. According to CAL FIRE, an area must meet all of the following criteria in order to be considered a WUI (CAL FIRE 2019):

- Minimum housing density of one unit per 20 acres
- In a moderate, high, or very high fire hazard severity zone (VHFHSZ)
- Not dominated by wildland vegetation (herbaceous, hardwood, conifer, shrub)

The WUI is composed of three distinct zones: Intermix, Interface, and the Influence Zone.

- Intermix areas are where homes and structures are interspersed with wildland vegetation, creating a complex pattern of development and fuels.
- Interface areas are where developed land directly borders wildland vegetation but without significant vegetation within the developed area itself.
- The Influence Zone refers to the buffer area surrounding wildland or developed zones where wildfire behavior—such as ember travel or radiant heat—can still pose a threat to nearby structures and infrastructure.

A portion of the southern area of the Specific Plan falls within a designated WUI zone, specifically labeled as an interface area, indicating the proposed Project is near wildland vegetation, as shown in Figure 4.18-1.

b. Specific Plan Area Conditions

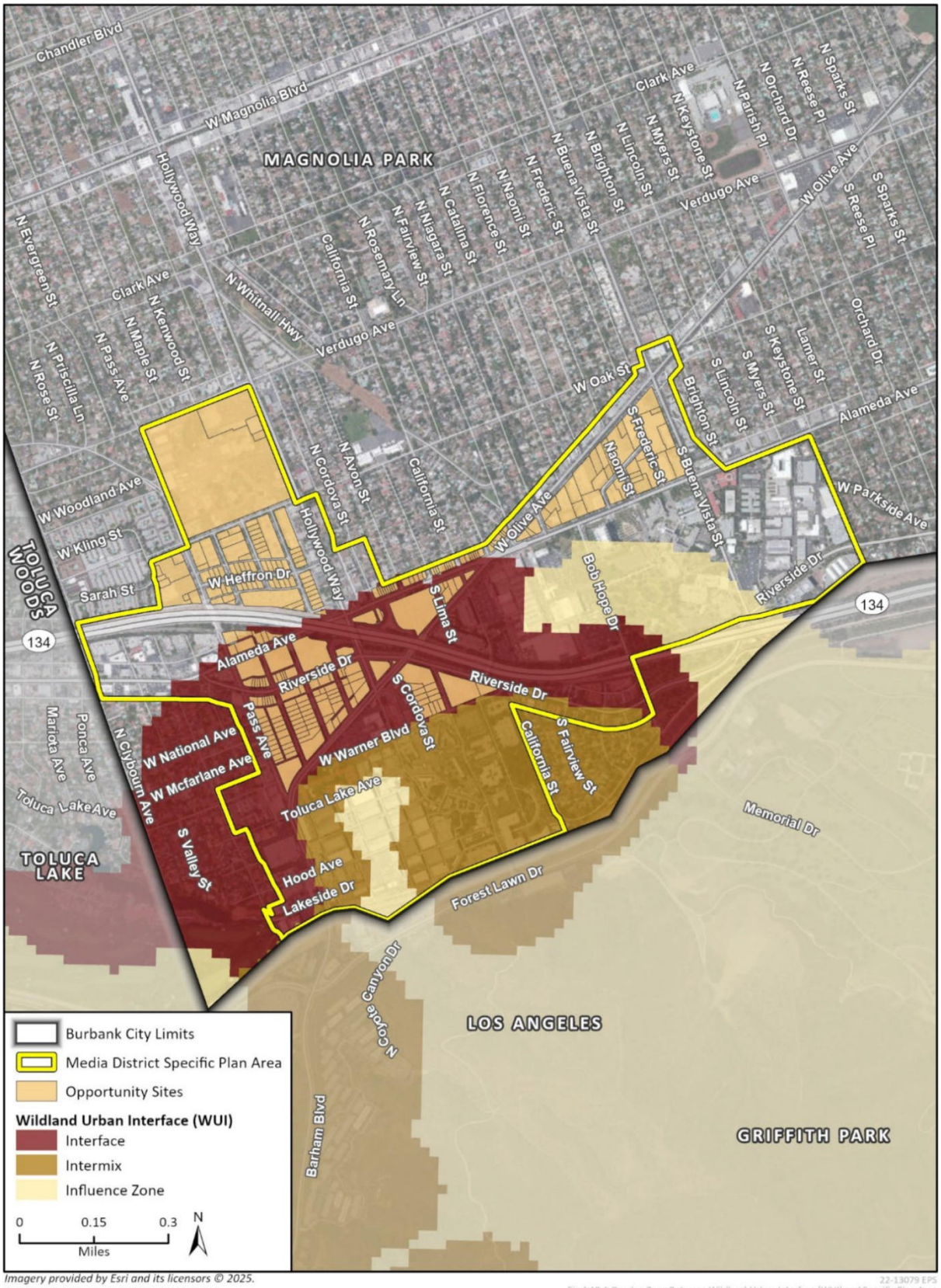
The Specific Plan Area lies in a dense urban development and near fire-prone natural landscapes. The surrounding area is situated within the foothills of the southeastern portion of the San Fernando Valley, an area that has history of wildfire activity. The Specific Plan Area is located near dense vegetation with nearby open space areas, such as Griffith Park to the southeast, as shown in Figure 4.18-2. The region features a mix of residential neighborhoods, commercial zones, and open space. Topographically, the Specific Plan Area includes foothills and canyons that channel Santa Ana winds, which are known to accelerate fire spread and intensity. The climate is characterized by hot, dry summers and low humidity, with persistent drought conditions resulting in increased fire potential.

Vegetation

Vegetation is fuel to wildfires, and it changes over time with seasonal growth and die-back. The relationship between vegetation and wildfire is complex, but generally some vegetation is naturally fire-resistant, while some vegetation is extremely flammable. For example, cured grass is much more flammable than standing trees. Grass is considered an open fuel, in which oxygen has free access to promote the spread of fire. Trees may be less likely to ignite quickly but can contribute to sustained burning once ignited. Additionally, weather and climate conditions, such as drought, can lead to increasingly dry vegetation with low moisture content and, thus, higher flammability.

The Specific Plan Area contains multiple plant communities, such as shrubs, trees, and grasslands, described in greater detail in Section 4.3, *Biological Resources*, of this EIR. These vegetation communities vary in their susceptibility to wildfire.

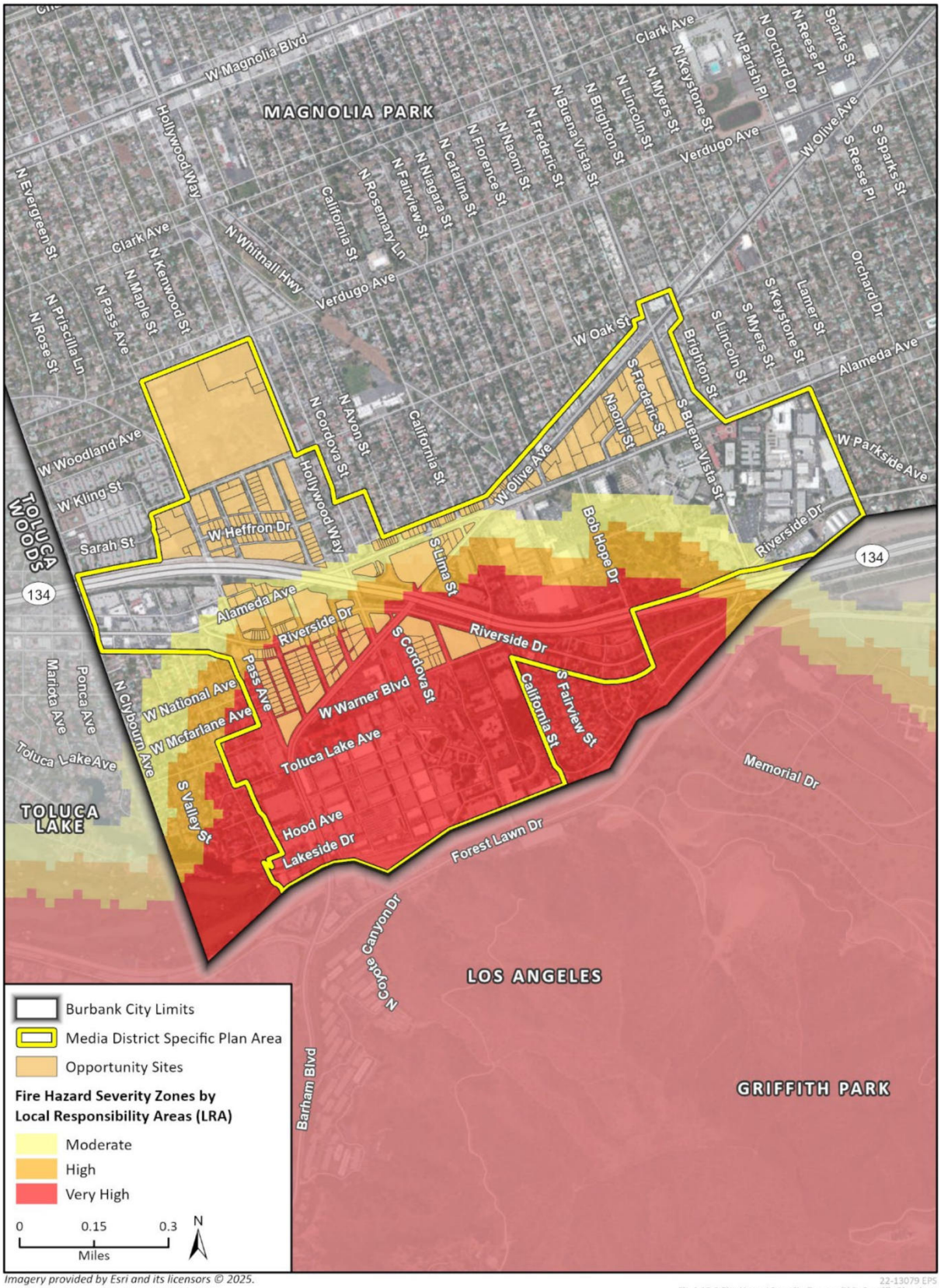
Figure 4.18-1 Wildland-Urban Interface Within the Specific Plan Area



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Additional data provided by CALFIRE, 2025.

22-13079 EPS
Fig 4.18-1 Overlap Zone Between Wildland-Urban Interface (WUI) and Specific Plan Area

Figure 4.18-2 VHFHSZ Within the Specific Plan Area



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Additional data provided by CALFIRE, 2025.

22-13079 EPS
Fig 4.18-2 Fire Hazard Severity Zones within Specific Plan Area

Slope, Elevation, and Aspect

Slope can determine how quickly a fire spreads. Fire typically burns faster uphill because it can pre-heat the fuels above with rising hot air, and upward drafts are more likely to create fire spots (National Park Service 2025). Areas containing steep, rugged terrain can also hinder access and the use of heavy firefighting equipment, posing additional difficulties for firefighting efforts. Following severe wildfires, sloping land is also more susceptible to landslide or flooding from increased runoff during substantial precipitation events. Landslides and surficial slope failure are most likely to occur in areas with more than 25 percent slope (hillside areas) and along steep bluffs.

Elevation affects fire behavior by influencing the timing and amount of precipitation, as well as exposure to prevailing winds. Aspect is the direction a slope faces, which determines how much radiated heat the slope will receive from the sun. Slopes facing a southerly to southwesterly direction will receive the most solar radiation; thus, they tend to be warmer and the vegetation drier than on slopes facing a northerly to northeasterly direction, creating a higher potential for wildfire ignition and spread (University of California Berkeley 2018).

The Specific Plan Area is primarily relatively flat with surrounding rugged hillsides and canyons to the north and southeast, which are characteristics of Southern California's WUI zones. The Verdugo Mountains are located 3.6 miles northeast of the Specific Plan Area, and Griffith Park and the Hollywood Hills are located immediately to the south-southeast of Forest Lawn Drive. The Verdugo Mountains, Griffith Park, and Hollywood Hills are characterized by moderate to steep terrain that supports shrub/chaparral communities and native woodlands consisting of oak trees. The elevation at the Specific Plan Area is approximately 538 feet above mean sea level. The nearest prominent peak, Cahuenga Peak, is located approximately 0.8 mile southeast of the Specific Plan Area in Griffith Park, where elevations reach up to approximately 1,634 feet above sea level.

Climate and Weather

Wind, temperature, and relative humidity are the most influential weather elements in fire behavior and susceptibility (National Park Service 2025). Fire moves faster under hot, dry, and windy conditions. Wind may also blow embers ahead of a fire, causing its spread. In addition, drought conditions lead to extended periods of excessively dry vegetation, increasing the fuel load and ignition potential.

Since the region is prone to a Mediterranean climate, with hot, dry summers and low humidity, this creates ideal conditions for wildfire ignition and spread. A local meteorological phenomenon, the Santa Ana winds, contributes to the high incidence of wildfires during the autumn and winter months. The Santa Ana winds often sweep west, bringing extremely dry air and high wind speeds that further desiccate plant communities at a time of the year when the constituent species already have very low moisture content (County of Los Angeles 2025). Santa Ana winds, which blow from the northeast, can push wildfires rapidly downhill into urban areas, such as the City of Burbank.

Power Lines

Above-ground power lines have the potential to contribute to wildfire risk, especially when they are near or traverse wilderness areas. In some instances, high winds can blow nearby trees and branches into power lines, sparking fires. Wind can also snap wooden poles, causing live wires to fall onto nearby grass or other fuel, igniting it. While the California Public Utilities Commission (CPUC) estimates only about 10 percent of California's wildfires are triggered by power lines, the frequency

and severity of these wildfires has spurred the agency to promulgate new requirements for power line safety practices (Atkinson 2018).

The Specific Plan Area includes existing overhead electrical infrastructure that serves surrounding commercial and residential properties. Power poles and overhead lines traverse the area, providing electrical service to existing buildings and adjacent facilities. These utilities are operated by Burbank Water and Power (BWP), a community-owned utility that supplies electricity, water, and fiber-optic services throughout the City.

c. Wildfire Hazard Designations

In California, State and local agencies share responsibility for wildfire prevention and suppression, and federal agencies take part as well. Federal agencies are responsible for oversight of federal lands in Federal Responsibility Areas (FRA). The State of California has determined that some non-federal lands in unincorporated areas with watershed value are of statewide interest and have classified those lands as State Responsibility Areas (SRA). CAL FIRE manages SRAs. All incorporated areas and unincorporated lands not in FRAs or SRAs are classified as Local Responsibility Areas (LRA).

While nearly all of California is subject to some degree of wildfire hazard, there are specific features that make certain areas more hazardous. CAL FIRE is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors (Public Resources Code (PRC) Sections 4201 through 4204; California Government Code Sections 51175-89). As described previously, the primary factors that increase an area's susceptibility to fire hazards include slope, vegetation type and condition, and atmospheric conditions. CAL FIRE maps fire hazards as zones, referred to as FHSZ. There are three levels of severity – Moderate, High, and Very High.

Each of the FHSZs influence how people construct buildings and protect property to reduce risk associated with wildland fires. Under state regulations, areas within VHFHSZs must comply with specific building and vegetation management requirements intended to reduce property damage and loss of life in those areas. However, none of the fire zones specifically prohibit development or construction. To reduce fire risk under state regulations, areas in VHFHSZs must comply with specific building and vegetation management requirements intended to reduce property damage and loss of life in those areas.

The Specific Plan Area is not found within an SRA; however, the majority of Specific Plan Area lies within a moderate FHSZ, high FHSZ, and VHFHSZ in an LRA, as shown in Figure 4.18-2 (CAL FIRE 2025a). The nearest VHFHSZ within an SRA is located approximately 6.5 miles northeast of the Specific Plan Area in La Crescenta (CAL FIRE 2025a). Additionally, the southern portion of the Specific Plan Area is designated as a Mountain Very High Fire Hazard Severity Zone under the Burbank2035 General Plan Safety Element (City of Burbank 2013). The City's Safety Element was updated in 2022 and clarified that the two Mountain Fire Zones in the City, one of which is located in the Specific Plan Area, are designated by CAL FIRE and the Burbank Fire Department as Very High Fire Hazard Severity Zones (City of Burbank 2022).

d. Fire History

A significant part of Los Angeles County is developed urban area situated near rugged topography with highly flammable vegetation. Los Angeles County experiences wet winters and warm, dry summers that dry out vegetation. During the fall, Santa Ana winds, known for the dry air and high wind speeds originating in the deserts north and east of Los Angeles County, sweep west into the County and further remove moisture from vegetation. Historically, fires that burn more than 1,000

acres have occurred in Los Angeles County about every one to three years, with the most recent fires being the Eaton Fire and Palisades Fire (January 2025), which burned 14,021 acres of land in the eastern part of the County in the San Gabriel Mountains and 23,448 acres of land in the western part of the County in the Santa Monica Mountains, respectively (CAL FIRE 2025b; CAL FIRE 2025c). The Eaton Fire killed at least 19 people and destroyed more than 9,000 buildings in the San Gabriel Mountains, approximately 9.3 miles northeast of the Specific Plan Area. The Palisades Fire killed at least 12 people and destroyed more than 6,837 buildings in the Santa Monica Mountains, approximately 13 southwest of the Specific Plan Area (CAL FIRE 2025c).

e. Post-fire Slope Instability and Drainage Pattern Changes

Vegetation loss from wildfire can result in slope instability in the form of more intensive flooding and landslides. The topography of the City of Burbank includes a mix of flat valley floors and steep hillsides, particularly along the Verdugo Mountains, Griffith Park, and the Hollywood Hills. These hillside areas are susceptible to geologic hazards, such as landslides, debris flows, and mudslides, especially following periods of intense rainfall or wildfire.

According to the California Department of Conservation (DOC) Seismic Hazard Zone Report for the Burbank Quadrangle, the City's susceptibility to landslides is influenced by a combination of factors, including slope gradient, surface and subsurface geology, historical groundwater levels, and seismic activity. These conditions make certain areas of Burbank prone to shallow landslides and debris flows, particularly in zones with loose or saturated soils. The City has recognized these risks and provides hazard-specific preparedness resources through platforms like ReadyBurbank.org, which educate residents on how to respond to debris flow (City of Burbank 2013). As described in Section 4.6, *Geology and Soils*, the Specific Plan Area is located in an urbanized area that is relatively flat. According to the DOC Earthquake Zones of Required investigation map, no portion of the Specific Plan Area is located in a landslide hazard zone (DOC 2023).

f. Emergency Evacuations

To prepare for potential wildland fires in the City, the Burbank2035 Safety Element provides several emergency access and evacuation routes, including:

- Glenoaks Boulevard
- San Fernando Boulevard
- Burbank Boulevard
- Victory Boulevard
- West Olive Avenue
- State Route 134 (SR-134)

The nearest evacuation routes to the Specific Plan Area are West Olive Avenue and SR-134, which bisects the Specific Plan Area.

4.18.2 Regulatory Setting

a. Federal Regulations

Disaster Mitigation Act of 2000

The Disaster Mitigation Act of 2000 provided a new set of mitigation plan requirements for state and local jurisdictions that encourage them to coordinate disaster mitigation planning and implementation. States are encouraged to complete either a "Standard" or "Enhanced" Natural Mitigation Plan. Enhanced plans demonstrate increased coordination of mitigation activities at the state level and, if completed and approved, increase the amount of federal funding available through the Hazard Mitigation Grant Program. The State of California State Hazard Mitigation Plan (SHMP) complies with this act.

National Fire Plan

The National Fire Plan was developed to establish plans for active response to severe wildland fires and their impacts to communities, while ensuring sufficient firefighting capacity. The plan addresses firefighting, rehabilitation, hazardous fuels reduction, community assistance, and accountability. The plan promotes close coordination among local, state, tribal, and federal firefighting resources by conducting training, purchasing equipment, and providing prevention activities on a cost-share basis. To help protect people and their property from potential catastrophic wildfire, the National Fire Plan directs funding to be provided for projects designed to reduce the fire risks to communities. High-risk communities identified in the WUI, the area where homes and wildlands intermix, were published in the Federal Register in 2001. At the request of Congress, the Federal Register notice only listed those communities neighboring federal lands (United States Department of Agriculture and United States Department of the Interior 2002). CAL FIRE incorporates concepts from this plan into state fire planning efforts.

b. State Regulations

California Code of Regulations, Title 14

The California Code of Regulations (CCR), Title 14, Division 1.5 provides fire safe regulations related to emergency access, address signage, and water standards. These regulations establish minimum wildfire protection standards for construction and development within the SRA. The standards include basic emergency access and perimeter wildfire protection measures, signage and building numbering, water supply resources for emergency fire use, and vegetation modification. They also include a minimum setback of 30 feet for all buildings from property lines and/or the center of a road and provide defensible space requirements for areas within 30 feet of a structure (Zone 1) and between 30 and 100 feet from a structure (Zone 2).

California Fire Code

The California Fire Code (CFC) is Part 9 of CCR Title 24 and is based on the International Fire Code. The CFC establishes the minimum requirements consistent with nationally-recognized good practices to safeguard public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises and to provide safety and assistance to firefighters and emergency responders during emergency operations. The CFC uses a hazard classification system to determine what protective measures are required to ensure fire safety

and protect lives. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure these safety measures are met, the CFC employs a permit system based on hazard classification. More specifically, CFC Chapter 8 addresses fire-related interior finishes; Chapter 9 addresses fire protection systems; and Chapter 10 addresses fire-related means of egress.

California Wildland-Urban Interface Code

The California Wildland-Urban Interface (WUI) Code is Part 7 of CCR Title 24 and went into effect on January 1, 2026. The 2025 WUI Code replaces and consolidates prior wildland-urban interface requirements that were previously included in various chapters of the CBC and CFC, among other regulations. The WUI Code applies to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure or any appurtenances connected or attached to such building structures within SRAs, WUI areas, or VHFHSZs in Local Responsibility Areas. The WUI Code standards include provisions for ignition-resistant construction standards in the WUI and use a hazard classification system to determine what protective measures are required to ensure fire safety and protect lives. Specifically, the WUI Code addresses materials and construction methods for exterior wildfire exposure, require preparation of a fire protection plan and vegetation plan, and sets requirements for building siting and fuel breaks.

California Strategic Fire Plan

The 2024 Strategic Plan prepared by CAL FIRE and the California Natural Resources Agency lays out central goals for reducing and preventing the impacts of fire in the state. The goals are meant to establish a natural environment that is more resilient and human-made assets that are more resistant to the occurrence and effects of wildland fire through local, state, federal, and private partnerships (CAL FIRE 2024). In addition to the 2024 Strategic Plan for California, individual CAL FIRE units develop fire plans, which are strategic documents that establish a set of tools for each CAL FIRE unit for its local area. Updated annually, unit fire plans identify wildfire protection areas, initial attack success, assets and infrastructure at risk, pre-fire management strategies, and accountability in their unit's geographical boundaries. The unit fire plan identifies strategic areas for pre-fire planning and fuel treatment as defined by the people who live and work locally. The unit fire plans include contributions from local collaborators and stakeholders and are aligned with other plans applicable to the area.

California State Hazard Mitigation Plan

The California Governor's Office of Emergency Services (Cal OES) prepares the SHMP, which identifies hazard risks and includes a vulnerability analysis and a hazard mitigation strategy for the State. The SHMP is required under the Disaster Mitigation Act of 2000 for the State to receive federal funding through the Hazard Mitigation Grant Program and disaster assistance. The SHMP represents the State's primary hazard mitigation guidance document, providing an updated analysis of the State's historical and current hazards, hazard mitigation goals and objectives, and hazard mitigation strategies and actions. The SHMP represents the State's overall commitment to supporting a comprehensive mitigation strategy to reduce or eliminate potential risks and impacts of disasters in order to promote faster recovery after disasters and, overall, a more resilient state. SHMPs are required to meet the elements outlined in the Federal Emergency Management Agency's (FEMA) State Mitigation Plan Review Guide.

Cal OES is responsible for the development and maintenance of the State's plan for hazard mitigation. The State's SHMP was last approved by FEMA as an Enhanced State Mitigation Plan in 2023. The plan is designed to reduce the effects of disasters caused by natural, technological, accidental, and adversarial/human-caused hazards. The SHMP sets the mitigation priorities, strategies, and actions for the state. The plan also describes how risk assessment and mitigation strategy information is coordinated and linked from local mitigation plans into the SHMP and provides a resource for local planners to obtain risk information that may affect their planning area. The State of California is required to review and revise its mitigation plan and resubmit for FEMA approval at least every five years to ensure continued funding eligibility for certain federal grant programs. The current SHMP was approved in August 2023 and remains valid through August 2028.

State Emergency Plan

The foundation of California's emergency planning and response is a statewide mutual aid system, designed to ensure adequate resources, facilities, and other support is provided to jurisdictions whenever their own resources prove to be inadequate to cope with an emergency situation.

The California Disaster and Civil Defense Master Mutual Aid Agreement requires signatories to the agreement to prepare operational plans to use in their jurisdiction and outside their area. These operational plans include fire and non-fire emergencies related to natural, technological, and war contingencies. The State of California, all state agencies, all political subdivisions, and all fire districts signed this agreement in 1950.

The State of California Emergency Plan (SEP) describes how response to natural or human-caused emergencies occurs in California. The plan is a requirement of the California Emergency Services Act and describes methods for conducting emergency operations, the process for rendering mutual aid, emergency services of government agencies, how resources are mobilized, how the public is informed, and how continuity of government is maintained during emergency. The SEP further describes hazard mitigation (actions to reduce risk), as well as preparedness and recovery from disasters.

California Government Code Section 8568, part of the California Emergency Services Act, states "The State Emergency Plan shall be in effect in each political subdivision of the state, and the governing body of each political subdivision shall take such action as may be necessary to carry out the provisions thereof." The act provides the basic authorities for conducting emergency operations following the proclamations of emergencies by the Governor or appropriate local authority, such as a City Manager. The provisions of the act are further reflected and expanded on by appropriate local emergency ordinances. The act further describes the function and operations of government at all levels during extraordinary emergencies.

All local emergency plans are extensions of the SEP, which conforms to the requirements of California's Standardized Emergency Management System (SEMS), which is the system required by California Government Code Section 8607(a) for managing emergencies involving multiple jurisdictions and agencies. The SEMS incorporates the functions and principles of the Incident Command System, the Master Mutual Aid Agreement, existing mutual aid systems, the operational area concept, and multi-agency or inter-agency coordination. Local governments must use SEMS to be eligible for funding of their response-related personnel costs under state disaster assistance programs. The SEMS consists of five organizational levels that are activated, as necessary, including field response, local government, operational area, regional, and State. Cal OES divides the state into several mutual aid regions.

California Public Resource Code

The PRC includes fire safety regulations for forest, range, and forage lands that restrict the use of equipment that may produce a spark, flame, or fire; requires the use of spark arrestors on construction equipment that use an internal combustion engine; specifies requirements for the safe use of gasoline-powered tools in fire hazard areas; and specify fire suppression equipment that must be provided on-site for various types of work in fire-prone areas. These regulations include the following:

- On days when a burning permit is required, flammable materials shall be removed to a distance of 10 feet from any equipment that could produce a spark, fire, or flame, and fire suppression equipment shall be available in the immediate area (PRC Section 4427)
- During the highest fire danger period from April 1 to December 1, no person except for an emergency crew member or those under or contracted with a publicly or privately-owned utility shall use any vehicle or tools powered by an internal combustion engine in any industrial operation located on or near any forest, brush, or grass-covered land, without providing and maintaining at the site appropriate fire suppression equipment during the operation (PRC Section 4428)
- On days when a burning permit is required, portable tools powered by gasoline-fueled internal combustion engines shall not be used within 25 feet of any flammable materials without providing and maintaining at the site appropriate fire fighting tools (PRC Section 4431)
- Earthmoving and portable equipment with internal combustion engines must be equipped with a spark arrestor to reduce the potential for igniting a wildland fire (PRC Section 4442)

PRC Sections 4201 through 4204 require preparation and review of FHSZs in California. In addition, PRC Section 4290 establishes minimum wildfire protection standards in conjunction with building, construction, and development in SRAs and FHSZs in LRAs. Under PRC Section 4290, the design and construction of structures, subdivisions, and developments in SRAs and FHSZs in LRAs must provide for basic emergency access and specified perimeter wildfire protection measures. These measures provide for road standards for emergency access, signing and building numbering, water supply reserves, and fuel breaks and greenbelts and are known as the State Minimum Fire Safe Regulations.

Executive Order N-05-19

On January 9, 2019, Governor Gavin Newsom issued Executive Order N-05-19 to address wildfire in California. Executive Order N-05-19 directs CAL FIRE, in consultation with other state agencies and departments, to recommend immediate-, medium-, and long-term actions to help prevent destructive wildfires. In response, CAL FIRE created the Community Wildfire Prevention and Mitigation Report, which contains recommendations to reduce the damage from wildfires across the state. Specifically, they focus on reducing wildfire fuel (such as vegetation clearing), long-term community protection (creating defensible space in communities), wildfire prevention, and forest health (CAL FIRE 2019).

California Government Code

California Government Code Sections 51175 through 51189 designate prevention of wildfires as a Statewide issue and classifies lands as VHFHSZs. Section 51179 requires local agencies to designate VHFHSZs within its jurisdiction following recommendations from the State Fire Marshal. Section

51181 requires that the State Fire Marshal periodically review VHFSZ maps in accordance with Sections 51178 and 51179.

According to California Government Code Section 51182, a person who owns, leases, controls, operates, or maintains an occupied dwelling or occupied structure in a VHFHSZ shall, at all times, do all of the following:

1. Maintain defensible space of 100 feet from each side and from the front and rear of the structure.
2. Remove that portion of trees that extends within 10 feet of the outlet of a chimney or stovepipe.
3. Maintain trees, shrubs, or other plants adjacent to or overhanging a building free of dead or dying wood.
4. Maintain the roof of a structure free of leaves, needles, or other vegetative materials.
5. Prior to constructing a new dwelling or structure that will be occupied or rebuilding an occupied dwelling or occupied structure damaged by a fire in that zone, the construction or rebuilding of which requires a building permit, obtain a certification from the local building official that the dwelling or structure, as proposed to be built, complies with all applicable state and local building standards.

c. Local Regulations

Burbank2035 General Plan

The Burbank2035 General Plan includes goals and policies to pursue fire protection. The following Burbank2035 Safety Element goals and policies are applicable to the proposed Project:

Goal 4: Fire Protection. Burbank provides high-quality fire protection services to residents and visitors. Threats to public safety are reduced and property is protected from wildland and urban fire hazards.

- **Policy 4.1:** Maintain a maximum response time of five minutes for fire suppression services. Require new development to ensure that fire response times and service standards are maintained.
- **Policy 4.3:** Implement fire prevention and suppression programs in the Very High Fire Hazard Severity Zone.
- **Policy 4.4:** Maintain adequate fire breaks in areas within and adjacent to areas of the Very High Fire Hazard Severity Zone.
- **Policy 4.6:** Increase the resilience of existing development in high-hazard areas built prior to modern fire safety codes or wildfire hazard mitigation guidance.
- **Policy 4.7:** Maintain adequate fire suppression capability in areas of intensifying urban development, as well as areas where urban uses and open spaces mix.
- **Policy 4.9**: Ensure that all existing and new residential development located in the Very High Fire Hazard Severity Zone and High Fire Hazard Severity Zone, has at least two emergency evacuation routes as well as adequate evacuation access (ingress and egress).
- **Policy 4.10**: Continue annual brush inspections and enforce 100 - 200 feet clearance requirements on public and private property within the Very High Fire Hazard Severity Zone (VHFHSZ), as dictated by Cal Fire, in accordance with the Board of Forestry and Fire Protection Fire Safe Regulations, California Building Standards Code, and Burbank Municipal Code

related to ongoing maintenance of vegetation clearance on public and private roads, roadside fuel reduction plan, and defensible space clearances.

- **Policy 4.12**: Increase the resilience of new development in Very High Fire Severity Zones in compliance with the Board of Forestry and Fire Protection Fire Safe Regulations, California Building Standards Code, and Burbank Municipal Code. Require all new development to be served by a water system that meets applicable fire flow requirements.
- **Policy 4.13**: Increase the resilience of existing development in Very High Fire Severity Zones built prior to modern fire safety codes or wildfire hazard mitigation guidance in compliance with the Board of Forestry and Fire Protection Fire Safe Regulations, California Building Standards Code, and Burbank Municipal Code.
- **Policy 4.14**: Require development of new public facilities, when feasible, to be located outside of Very High Fire Severity Zones to ensure critical infrastructure is fire resilient.
- **Policy 4.15**: Ensure that re-development after a large fire complies with the requirements for construction in the Very High Fire Hazard Severity Zones for fire safety.
- **Policy 4.16**: Ensure that the planning and design of development in Very High Fire Hazard Severity Zones minimizes wildfire hazards and includes adequate provisions for vegetation Page 7-5 Burbank2035: General Plan Safety management, emergency vehicle access, and firefighting while also complying with current fire codes.
- **Policy 4.17**: Require fire protection plans for new development in Very High Fire Hazard Severity Zones.
- **Policy 4.18**: Require visible home and street addressing, and signage across the City.
- **Policy 4.19**: The Burbank Police and Fire Departments should routinely assess and project future emergency service needs associated with wildland and urban fire hazards.
- **Policy 4.20**: Burbank Water and Power shall manage and regularly maintain water supply infrastructure so that water pressure is adequate for fire-fighting purposes. Regular maintenance and long term integrity of water supply locations for fire fighting purposes should be identified.
- **Policy 5.2**: Require geotechnical reports for new development projects in areas with the potential for liquefaction or landslide. Include projected climate change impacts of slope stability changes after wildfires and develop mitigation strategies for areas deemed at risk to slope instability.

Burbank Municipal Code

The Burbank Municipal Code (BMC) is the comprehensive set of laws and regulations governing the City of Burbank. It is organized into multiple titles that address various aspects of city governance, public safety, development, and environmental protection. Key policies relevant to wildfire risk include:

- **Section 9-1-2-1403.3.3**: Prohibits wood shakes and shingles on new construction
- **Section 9-1-2-1403.3.4:** Specifies standards for repairs to existing wood exteriors
- **Section 9-1-2-1501.1.1:** Prohibits wood roofs in designated fire hazard areas
- **Section 9-1-2-1405.1.1:** Regulates combustible wall coverings

Burbank Fire Department

Burbank Fire Department (BFD) plays a vital role in emergency preparedness, hazard mitigation, and wildfire prevention. The BFD consists of seven divisions, including Fire Prevention Bureau, Fire Suppression, Emergency Medical Services, Emergency Management, Fire Apparatus and Equipment, Training and Safety, and Administration. If the City has a fire emergency for which the BFD does not have sufficient resources, a Statewide system of mutual aid can provide services. These aid requests are processed through Cal OES; under this system, the City is to rely on its own resources and neighboring jurisdiction's resources before calling for outside assistance. BFD has mutual aid agreements with the Los Angeles County Fire Department (LACFD) and City of Los Angeles Fire Department (LAFD) and has automatic mutual aid through Area C Unified Response with the cities of Alhambra, Arcadia, Glendale, Montebello, Monrovia, Monterey Park, Pasadena, San Gabriel, San Marino, Sierra Madre, South Pasadena, and Vernon, as well as the Burbank-Glendale-Pasadena Airport Authority Fire Department.

BFD reviews site plans, construction plans, and architectural plans prior to occupancy to ensure that required fire protection safety features, including building sprinklers and emergency access, are implemented. Development with modern materials[1] and in accordance with current standards, inclusive of fire-resistant materials, fire alarms and detection systems, automatic fire sprinklers, would enhance fire safety and would support fire protection services (Title 24, CCR Part 9). BFD Station 12 is the nearest station to the Specific Plan Area, located approximately 0.37 mile north of the Specific Plan Area.

BWP Wildfire Mitigation Plan

The 2024 BWP Wildfire Mitigation Plan describes the preventative strategies and programs that BWP is undertaking to prevent wildfires resulting from its electrical infrastructure. Wildfire prevention strategies include attention to fire prevention during ongoing operation and maintenance activities and during planning, design, and construction of new facilities. Four primary fire safety categories encompass the preventative strategies and programs: (1) design and construction, (2) inspection and maintenance, (3) operational practices, and (4) situational/conditional awareness.

The 2024 Wildfire Mitigation Plan also analyzes the wildfire risks of the existing electrical system and electric service territory, which includes the Specific Plan Area. The 2024 BWP Wildfire Mitigation Plan identifies high-fire threat districts designated by the CPUC. The Specific Plan Area is not located within a high-fire threat district, but the dense vegetated areas south of the Specific Plan Area are designated as a Tier 2 (elevated risk of potential impacts to people and property) high-fire threat district (BWP 2024). BWP does not operate any facilities within the Tier 2 high-fire threat district located south of the Specific Plan Area. Thus, the Specific Plan Area is at low risk of BWP facilities sparking within the Tier 2 high-fire threat district located south of the Specific Plan Area.

2025 California Building Standards/Wildland-Urban Interface Regulations

Ordinance No. 25-4,034 adopts by reference the 2025 California Building Standards Code along with the 2025 California Wildland-Urban Interface Code and the 2024 International Property Maintenance Code and incorporates local amendments specific to Burbank into Title 9 (Building Regulations) of the BMC. This ordinance took effect on January 1, 2026.

[1] Modern materials refer to materials utilized for development that have significantly improved in terms of performance, functionality, and sustainability.

4.18.3 Impact Analysis

a. Significance Criteria

For the purposes of this environmental analysis, thresholds of significance are based on the questions in Appendix G of the *CEQA Guidelines*, which states that impacts related to wildfire would be potentially significant if implementation of the proposed Project would do any of the following:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan.
2. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
3. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.
4. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Thresholds 1 through 4 are analyzed below.

b. Methodology

Impacts related to wildfire hazards and risks were evaluated using FHSZ mapping, aerial imagery, and topographic mapping. In addition, weather patterns related to prevailing winds and precipitation trends were evaluated as they relate to the spread and magnitude of wildfire. CEQA does not generally require an agency to consider the effects of existing environmental conditions on a proposed Project's future users or residents. Consequently, impacts under the thresholds identified below would only be considered significant if the potential risks under the proposed Project exacerbate those existing environmental conditions.

c. Project Impacts

Threshold 1:	If located in or near SRAs or lands classified as VHFHSZs, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Impact W-1 THE SOUTHERN PORTION OF SPECIFIC PLAN AREA IS DESIGNATED AS A VHFHSZ WITHIN AN LRA. FUTURE DEVELOPMENT PROJECTS ACCOMMODATED BY THE PROPOSED PROJECT WOULD NOT INVOLVE ANY PROJECT COMPONENTS THAT WOULD IMPAIR AN EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN. GENERALLY, COMPLIANCE WITH THE CITY'S REGULATIONS AND SITE PLAN REVIEW WOULD BE EXPECTED TO AVOID IMPAIRMENT AND POTENTIAL IMPACTS RELATED TO ADOPTED EMERGENCY RESPONSE PLANS OR EMERGENCY EVACUATION PLANS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The Specific Plan Area is not located within a State Responsibility Area (SRA); however, the majority of proposed Project south of SR 134 is designated as a VHFHSZ within an Local Responsibility Area (LRA), as shown in Figure 4.18-1 (CAL FIRE 2025a). Additionally, the southern portion of the Specific Plan Area is designated as a Very High Fire Hazard Severity Zone under the Burbank2035 General Plan Safety Element (City of Burbank 2022). The majority of the opportunity sites identified in the Specific Plan Area are located in the northern portion of the Specific Plan Area, but some opportunity sites

are located within the VHFHSZ portion of the Specific Plan Area, as shown in Figure 4.18-2. Therefore, the proposed Project would facilitate development within the VHFHSZ portion of the Specific Plan Area.

The proposed Project could potentially result in the development within the Wildland Urban Interface (WUI) if projects under the proposed Project were to occur directly adjacent to the WUI in areas that are currently considered "wildland," as shown in Figure 4.18-1. However, it is not expected that buildout of the proposed Project would contribute to the critical fire environment because it would not increase the area of the WUI.

Fuel modification requirements dictate permanent vegetation management standards surrounding buildings, particularly in areas in or near the VHFHSZ within the Specific Plan Area. In addition, the California Building Standards Code and California WUI Code include minimum fire hazard reduction requirements in the VHFHSZ for driveway widths, the creation and maintenance of wildfire buffers, sprinklers, and alarms. As such, development is not likely or anticipated on a level that would significantly conflict with an adopted emergency response plan or emergency evacuation plan.

In the event of a wildfire, the City's Emergency Operations Center would be activated to coordinate response by staff members and representatives from various City departments who are assigned emergency responsibilities (City of Burbank 2013). The BFD Emergency Management Division would coordinate all the facilities and personnel of the City, along with the jurisdictional resources of the surrounding cities and the County. The Burbank Police Department would assist with wildfire response, especially as related to traffic control.

Designated evacuation routes within the Specific Plan Area include SR-134 and West Olive Avenue. The proposed Project involves pedestrian intersection improvements along West Olive Avenue at Riverside Drive, which include updating crosswalks, curb ramps, lighting, landscaping, and curb extensions. These improvements on West Olive Avenue would occur within the existing right-of-way and would not result in temporary or permanent road closures to impair an emergency evacuation plan. The proposed Project does not include any changes or improvements to SR-134 and, thus, would not result in temporary or permanent road closures to impair an emergency evacuation plan. The Burbank2035 General Plan Safety Element also outlines designated evacuation routes and emergency procedures to support wildfire preparedness.

As part of the entitlement and implementation processes for individual projects, the City's Community Development Department Transportation Planning Division, Public Works Traffic Section, and BFD are responsible for ensuring that development in the City would not impair adopted emergency response or evacuation plans. As part of standard development procedures, plans for future development projects under the proposed Project would be submitted for review and approval to ensure that all new development would have adequate emergency access and escape routes in compliance with applicable regulations. BFD would enforce provisions of the CFC and the BMC, which include requirements for fire and life safety compliance in building plans, brush clearance programs, and coordination with regional agencies for hazardous materials oversight.

Construction activities from future development projects under the proposed Project could interfere with adopted emergency response or evacuation plans as a result of temporary construction activities within the public rights-of-way in the Specific Plan Area. However, temporary barricades or other obstructions used during construction that could impede emergency access would be reviewed by City staff to ensure consistency with all applicable City and State design standards and emergency access requirements. Implementation of a construction management plan would reduce potential impacts from construction of future development projects under the proposed Project related to

impairing or physically interfering with adopted emergency response or evacuation procedures. As such, future developments would be reviewed by City staff to ensure consistency with all applicable City and State design standards and emergency access requirements and plans to ensure development would not impair or physically interfere with adopted emergency response or evacuation procedures. Therefore, impacts related to adopted emergency response plans or emergency evacuation plans would be less than significant.

In the event of a wildfire, this increase in traffic may impede the rate of evacuation for the City's residents. Concurrently, the response times for emergency medical or containment services could also be adversely affected by increased traffic. However, the proposed Project would not introduce any physical features or policies that would preclude implementation of or alter existing emergency response procedures. As detailed above, the proposed pedestrian improvements on West Olive Avenue would occur within the existing public right-of-way and would not result in temporary or permanent road closures to impair an emergency evacuation plan; and future development under the proposed Project would remain subject to the City's permitting process which would ensure that all new development under the proposed Project has adequate emergency access and escape routes in compliance with existing City regulations. Therefore, access for emergency service providers and evacuation routes would be maintained during construction and operation activities associated with the proposed Project. Therefore, impacts related to adopted emergency response plans or emergency evacuation plans would be less than significant.

Determination

Less than significant

Threshold 2:	If located in or near SRAs or lands classified as VHFHSZs, would the project exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors?

Impact W-2 FUTURE DEVELOPMENT ACCOMMODATED BY THE PROPOSED PROJECT COULD POTENTIALLY OCCUR WITHIN A VHFHSZ AND CONSTRUCTION ACTIVITIES COULD EXACERBATE WILDFIRE RISKS. MITIGATION MEASURE W-1 WOULD REQUIRE MEASURES TO REDUCE CONSTRUCTION-RELATED WILDFIRE RISKS, AND IMPACTS WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED.

The Specific Plan Area is not found within an SRA; however, the majority of proposed Project Area south of SR- 134 is designated as a VHFHSZ in an LRA, as shown in Figure 4.18-1 (CAL FIRE 2025a). The majority of the opportunity sites included in the proposed Project are located in the northern portion of the Specific Plan Area, but some opportunity sites are located within the VHFHSZ portion of the Specific Plan Area, as shown in Figure 4.18-2. Therefore, the proposed Project would facilitate development within the VHFHSZ portion of the Specific Plan Area.

The Specific Plan Area is characterized as primarily flat terrain that is developed with studios and commercial and residential uses. Surrounding land uses along the southern boundary of the Specific Plan Area include rugged hillsides, canyons, and residential development typical of Southern California's WUI zones, with elevations ranging from approximately 538 feet above mean sea level to nearby peaks reaching 1,634 feet that contribute to elevated fire risk.

During construction of future development under the proposed Project, there would be a temporary increase in human activity and potential ignition sources, including equipment that could create spark, be a source of heat, or leak flammable materials within the Specific Plan Area. Heat or sparks

from construction equipment, vehicles, and the use of flammable hazardous materials have the potential to ignite adjacent vegetation and start a fire, especially during weather events that include low-humidity and high wind speeds. The potential risk of wildfire ignition and spread associated with individual project construction would be potentially significant.

If wildfires occur nearby, there is potential for smoke to drift into the Specific Plan Area and increase pollutant concentrations for residents. Additionally, the proposed Project could potentially result in the expansion of the WUI if future development projects under the proposed Project were to occur directly adjacent to the interface in areas that are currently considered "wildland." However, it is not expected that buildout of the proposed Project would contribute to the critical fire environment because it would not create additional wildland spaces and therefore would not increase the length of the WUI. In recent decades (since circa 1980), human-caused fires have been negatively correlated with population density, meaning more developed areas are less likely to be affected by wildfires throughout the State and suggesting that additional development would not necessarily lead to more wildfire risk (Keeley and Syphard 2018). Due to the location of the Specific Plan Area in a heavily urbanized area and not directly abutting undeveloped hillsides, the exposure of existing and future occupants of the Specific Plan Area to uncontrolled spread of wildfire is low. Fuel modification requirements dictate permanent vegetation management standards surrounding buildings, particularly in area in or near the VHFHSZ within the Specific Plan Area. In addition, the CBC, CFC, and California WUI Code include minimum fire hazard reduction requirements in the VHFHSZ for driveway widths, the creation and maintenance of wildfire buffers, sprinklers, and alarms. Compliance with the development standards described in Section 4.18.2, *Regulatory Setting*, would further reduce the potential for increased wildfire risk or the uncontrolled spread of wildfire in the Project Area. Therefore, during operation, the proposed Project would not substantially exacerbate wildfire risks, expose future occupants to pollutant concentrations from a wildfire, or contribute to the uncontrolled spread of wildfire and impacts would be less than significant.

Mitigation Measures

W-1 Construction Wildfire Risk Reduction

For future development under the proposed Project in a VHFHSZ, the future development project applicant shall include mitigation to reduce risk of loss, injury, or death from wildfire, including:

1. All construction equipment powered by internal combustion engines shall be equipped with spark arresters. The spark arresters shall be maintained per manufacturer recommendations to ensure adequate performance.
2. Prohibit certain project construction activities with potential to ignite wildfires during red-flag warnings issued by the National Weather Service for the project site location. Example activities that should be prohibited during red-flag warnings include welding and grinding outside of enclosed buildings during construction.
3. Require fire extinguishers to be on site during project construction. Fire extinguishers shall be maintained to function according to manufacturer specifications. Construction personnel shall receive training on the proper methods of using a fire extinguisher.
4. Adequate fire protection infrastructure shall be available during construction. Examples include, but are not limited to, accessible water supply for firefighting, fire-resistant barriers, and a temporary standpipe system.
5. Firebreaks as necessary to prevent a fire on the premises from spreading to adjacent brush or grass covered areas.

For future development under the proposed Project in a VHFHSZ where the BFD has determined existing regulations are not adequate based on unusual site-specific, roadway-specific, or project-specific conditions, the future development project applicant shall include the following mitigation to reduce risk of loss, injury, or death from wildfire:

1. Provision of approved, competent fire safety officers or advisors, as deemed by BFD, to act as fire guards or firewatchers to patrol the area when construction activities such as clearing of the land, erection of buildings, construction of roads, utility lines are taking place.

Significance After Mitigation

Implementation of Mitigation Measure W-1 would reduce potential wildfire risk during construction by requiring equipment spark arrestors, red-flag restrictions, clear access roads, and fire protection and safety equipment. By requiring the site-specific measures outlined in Mitigation Measure W-1, the likelihood of wildfire ignition and spread would be minimized, therefore Mitigation Measure W-1 would reduce the impact to less than significant with mitigation incorporated.

Determination

Less than significant with mitigation incorporated

Threshold 3:	If located in or near SRAs or lands classified as VHFHSZs, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Impact W-3 FUTURE DEVELOPMENT PROJECTS WITHIN THE PROPOSED SPECIFIC PLAN AREA, WHICH IS LOCATED IN OR NEAR SRAS OR LANDS CLASSIFIED AS VHFHSZS, WOULD NOT REQUIRE THE INSTALLATION OR MAINTENANCE OF ASSOCIATED INFRASTRUCTURE, SUCH AS ROADS, FUEL BREAKS, EMERGENCY WATER SOURCES, POWER LINES OR OTHER UTILITIES, THAT MAY EXACERBATE FIRE RISK OR THAT MAY RESULT IN TEMPORARY OR ONGOING IMPACTS TO THE ENVIRONMENT. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

The Specific Plan Area is in an urbanized area of the City that includes existing roads, pipelines, and overhead electrical infrastructure that serves surrounding commercial and residential properties. Power poles, overhead lines, and pipelines traverse the area, providing electrical, telecommunications, water, and wastewater services to existing buildings and adjacent facilities. These utilities are operated by BWP, a community-owned utility that supplies electricity, and water services throughout the City, along with private companies that provide telecommunication services. The 2024 BWP Wildfire Mitigation Plan also analyzes the wildfire risks of the existing electrical system and electric service territory, which includes the Specific Plan Area. The 2024 BWP Wildfire Mitigation Plan identifies high-fire threat districts designated by the CPUC. As detailed in Section 4.18.2, *Regulatory Setting*, the Specific Plan Area is not located within a high-fire threat district designated by the CPUC, but the dense vegetated areas south of the Specific Plan Area are designated as a Tier 2 (elevated risk of potential impacts to people and property) high-fire threat district. BWP does not operate any facilities that could risk ignition (e.g., electrical transmission, subtransmission, distribution lines, substations, or other facilities) within the Tier 2 high-fire threat district located south of the Specific Plan Area. Thus, BWP facilities and equipment within the Specific Plan Area do not pose a direct wildfire hazard threat to the Tier 2 high-fire threat district located south of the Specific Plan Area.

Future development within the Specific Plan Area would be served by existing surrounding roads and extensions of existing power lines, water sources, and other utilities. The extension or improvement of infrastructure for future development projects would be implemented in accordance with all local and State regulations pertaining to power lines and other related infrastructure and fire suppression requirements, which would include CBC, CFC, CPUC, and WUI Code requirements for fire protection and project would be subject to review and approval by the BFD. Additionally, adherence to the strategies and programs detailed in the 2024 BWP Wildfire Mitigation Plan, such as the vegetation management program, regular pole condition assessments, and public safety power shutoffs, would minimize wildfire risk associated with the operation and maintenance of electrical infrastructure, including overhead powerlines within and near the Specific Plan Area. Therefore, compliance with existing regulations would ensure that potential impacts associated with infrastructure improvements for future development projects under the proposed Project would be less than significant.

Determination

Less than significant

Threshold 4:	If located in or near SRAs or lands classified as VHFHSZs, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Impact W-4 FUTURE DEVELOPMENT PROJECTS WITHIN THE PROPOSED SPECIFIC PLAN AREA, WHICH IS LOCATED IN OR NEAR SRAS OR LANDS CLASSIFIED AS VHFHSZS, WOULD NOT EXPOSE PEOPLE OR STRUCTURES TO SIGNIFICANT RISKS, INCLUDING DOWNSLOPES OR DOWNSTREAM FLOODING OR LANDSLIDES, AS A RESULT OF RUNOFF, POST-FIRE SLOPE INSTABILITY, OR DRAINAGE CHANGES. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Vegetation on hillslopes helps to stabilize soil, slow water flow, and support percolation into the soil. Severe wildfires damage trees, the shrub canopy, vegetation, and soil. Once vegetation burns, a greater surface area of soil is exposed to the elements, and the lack of roots decreases the structural integrity of the soil. Thus, wildfire burn areas typically endure an increased runoff after intense rainfall, which can put residences and structures downslope of a burned area at risk of localized floods and landslides.

The Specific Plan Area is generally characterized by flat terrain that is developed and consists primarily of commercial and residential uses. The southern boundary of the Specific Plan Area abuts Griffith Park and the Hollywood Hills, which include rugged hillsides, canyons, and residential development typical of Southern California's WUI zones with elevations ranging from approximately 538 feet above mean sea level to nearby peaks reaching 1,634 feet. The Specific Plan Area's southern portion is designated as a VHFHSZ within an LRA. The nearby steep slopes and heavy hillside vegetation contribute to wildfire risks due to the potential for downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

As discussed in Section 4.9, *Hydrology and Water Quality,* the proposed Project would conform to design requirements associated with proper site preparation and grading practices and would implement surface drainage improvements and erosion control measures as well as construction best management practices (BMPs). Construction BMPs would be implemented during grading operations, as specified in the Stormwater Pollution Prevention Plan (SWPPP), to stabilize graded slopes and prevent excessive runoff and erosion. During operation, future development projects accommodate by the proposed Specific Plan would be located in a predominantly flat, urbanized setting where post-fire erosion risks are minimal. Furthermore, development would be subject to applicable standards

identified in the regulatory setting, which ensure long-term site stability and minimize the potential for post-fire runoff or erosion impacts. As such, additional post-fire erosion control or slope stabilization measures are not anticipated to be necessary.

As discussed in Section 4.19.5, *Geology and Soils*, the Specific Plan Area's risk of landslide is low, as the Specific Plan Area is in an urbanized, relatively flat area of the City. Thus, future development projects under the proposed Project would not directly or indirectly cause impacts related to landslides. In the event of a wildfire, the City's Emergency Operations Center would be activated to coordinate response by staff members and representatives from various City departments who are assigned emergency responsibilities (City of Burbank 2013). The BFD Emergency Management Division would coordinate all the facilities and personnel of the City, along with the jurisdictional resources of the surrounding cities and the County. The proposed Project would not expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be less than significant.

Determination

Less than significant impact

4.18.4 Cumulative Impacts

The geographic scope for cumulative wildfire impacts is the entire City of Burbank and surrounding communities, including the City of Los Angeles and the City of Glendale. This area is appropriate for the analysis because it encompasses a mix of urban development and wildland fuels that are present near the Specific Plan Area and throughout the Los Angeles region. *CEQA Guidelines* Section 15130(a) requires an assessment of a project's cumulative effects to determine whether its incremental impact, when combined with other projects, is significant. This analysis considers growth envisioned by the proposed Project as well as other related plans, including the Downtown Transit Oriented Development (TOD) Specific Plan (a consolidation and update of the North San Fernando Boulevard Master Plan and the Burbank Center Plan) and the Golden State Specific Plan (GSSP). As described in Section 3, *Environmental Setting,* the Downtown TOD Specific Plan would facilitate development of up to 9,944 residential units and 6,083,657 square feet of commercial and business development land uses; and the GSSP would facilitate development of up to 7,205 residential units and 3,149,623 square feet of commercial and business development land uses. The Downtown TOD Specific Plan Area and GSSP Area are both located within 0.25 mile of a FHSZ (CAL FIRE 2025a).

Emergency Response Plan or Emergency Evacuation Plan

While portions of the cumulative study area are located in or near SRAs and/or VHFHSZs, the Specific Plan Area and the areas encompassed within the other three specific plans identified above are largely urbanized and include major transportation corridors that act as fire breaks and support regional emergency access. Development included in these specific plans would be subject to applicable local and State regulations that ensure emergency access and coordination with emergency service providers. Individual development projects envisioned under these cumulative plans would also be subject to environmental review under CEQA, as applicable, further ensuring that emergency response and evacuation considerations are addressed. With adherence to local and State fire safety regulations, the incremental effect of the proposed Project related to emergency response plans or emergency evacuation plans would not be cumulatively considerable, and cumulative impacts would be less than significant.

Exacerbation of Wildfire Risks and Exposure to Pollutant Concentrations

While the cumulative study area includes wildland areas with elevated fire risk, the Specific Plan Area is located in a flat, urbanized portion of Burbank with limited natural fuel loads and minimal exposure to slope-driven fire behavior or prevailing wind corridors. Due to the location of the Specific Plan Area in a heavily urbanized area not directly abutting undeveloped hillsides, the risk of uncontrolled spread of wildfire through the Specific Plan Area into the surrounding cumulative study area is low. Regional infrastructure, such as SR-134, Interstate 5, and surrounding development further act as fire breaks that reduce the potential for wildfire spread. Additionally, future development envisioned under each of the specific plans identified above and throughout the cumulative study area would be required to comply with applicable fire safety regulations and design standards that minimize wildfire risk and the risk of uncontrolled wildfire spread. Cumulative construction impacts related to the exacerbation of wildfire risks would be reduced to a less-than-significant level with adherence to fire safety and evacuation regulations and implementation of Mitigation Measure W-1. Individual development projects envisioned under these cumulative plans would also be subject to environmental review under CEQA, as applicable, which would confirm wildfire risks are adequately addressed. With adherence to fire safety regulations and implementation of Mitigation Measure W-1, the incremental effect of the proposed Project related to the exacerbation of wildfire risks would not be cumulatively considerable, and cumulative impacts would be less than significant with mitigation incorporated.

Installation or Maintenance of Infrastructure

While the cumulative study area includes wildland areas with elevated fire risk, the Specific Plan Area is located in a highly urbanized and predominantly flat portion of Burbank, where new infrastructure would be limited to typical urban improvements and would not introduce substantial new ignition sources or fuel modification zones. Additionally, development would be subject to applicable fire safety and utility design standards that minimize fire risk. Any physical development envisioned under these cumulative plans would also be subject to environmental review under CEQA, as applicable, which would ensure that infrastructure-related wildfire risks are adequately addressed. With adherence to applicable standards and regulations, the proposed Project, in combination with the Downtown TOD Specific Plan and the GSSP, would not result in significant cumulative impacts related to the installation or maintenance of infrastructure that could exacerbate wildfire risk or cause temporary or ongoing environmental impacts. Therefore, the proposed Project's individual contribution to cumulative wildfire-related infrastructure impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

Exposure to Downslope or Downstream Flooding or Landslides

Although the cumulative study area includes hillside and wildland areas susceptible to post-fire hazards, the Specific Plan Area is located in a flat, urbanized portion of Burbank with limited potential for slope-driven runoff or landslides. Future cumulative development would be required to comply with applicable drainage and grading standards and BMPS, as detailed under Impact W-4, that minimize the potential for post-fire flooding or erosion-related impacts. Any physical development envisioned under these cumulative plans would also be subject to environmental review under CEQA, as applicable, which would ensure that infrastructure-related wildfire risks are adequately addressed. With adherence to applicable standards and regulations, the proposed Project, in combination with the Downtown TOD Specific Plan and the GSSP, , would not result in significant cumulative impacts related to post-fire slope instability, downstream flooding, or drainage changes that could expose people or structures to significant risks. Therefore, the proposed Project's individual contribution to

cumulative post-fire geologic or hydrologic risks would not be cumulatively considerable, and cumulative impacts would be less than significant.

4.19 Effects Found Not to be Significant

Section 15128 of the *CEQA Guidelines* requires an EIR to briefly describe any possible effects that were determined not to be significant and were, therefore, not discussed in detail within the environmental impact analysis. This section addresses the potential environmental effects of the proposed Project that were determined to be less than significant or have no impact and includes environmental checklist items from Appendix G of the *CEQA Guidelines* related to aesthetics, agriculture and forestry resources, air quality, biological resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, recreation, transportation, and utilities and service systems.

At the start of the preparation of this EIR, impacts that have potential for significant impact and rely on the issue area-specific environmental and regulatory setting were further analyzed in the respective issue area section. Upon detailed analysis, some impacts were found to not be significant but were still included in the individual issue areas in Section 4, *Environmental Impact Analysis*, of this EIR. Any checklist items not addressed in this section are analyzed under the individual issue areas in Section 4, *Environmental Impact Analysis*, of this EIR.

4.19.1 Aesthetics

Appendix G of the *CEQA Guidelines* states that the aesthetic impacts of a project are considered significant if the project would:

1) Have a substantial adverse effect on a scenic vista.

The proposed Project would involve land use changes that would increase the amount of future development in the Burbank Media District Specific Plan Area (hereafter referred to as "Specific Plan Area") compared to existing conditions. As identified in the Conservation and Open Space Element of the Burbank2035 General Plan, scenic vistas are defined as viewpoints that provide expansive views of a highly valued landscape for the benefit of the general public. In the City of Burbank (hereafter referred to as "City" or "Burbank"), scenic vistas are limited to the Verdugo Mountains and Santa Monica Mountains (City of Burbank 2013). The Verdugo Mountains are located over 10 miles northeast of the Specific Plan Area and views are not prominent from the Specific Plan Area due to distance and intervening development. The Santa Monica Mountains are located directly south of the Specific Plan Area and, therefore, are partially visible from the Specific Plan Area, with obstruction due to existing intervening development. Scenic resources in the Specific Plan Area may also include public parks and open space, such as Johnny Carson Park (City of Burbank 2013).

Future mid- and high-rise development accommodated by the proposed Project in the Specific Plan Area would be typically visible from no more than several blocks away due to the presence of intervening development. High-rise buildings may be visible from longer distances, but at more than several blocks away, a single building would represent a small proportion of the overall vista and thus, would not substantially alter views of the Santa Monica Mountains or Verdugo Mountains. However, in general, increases in building height would not obstruct public views of scenic resources or vistas because scenic vistas generally are not available in these urbanized areas and, where vistas are available, new development would be consistent with the current urban landscape and thus would not substantially alter the nature of existing views along public rights-of-way or from other public view locations. Construction would largely involve infill development in already densely developed areas and preservation of open space areas and historical structures would be prioritized.

Furthermore, the proposed Project includes development standards that would regulate the permitted height of structures. Consequently, any change to the existing views of scenic vistas due to taller development would be incremental since these views are already largely obstructed by existing development. Any changes to existing views of urban streetscapes would also be incremental since most existing streetscape views are limited to close-foreground views and are relatively unaffected by increased building height. Therefore, compliance with applicable Burbank Municipal Code (BMC) requirements and proposed Project policies and regulations would minimize potential impacts to scenic vistas and impacts would be less than significant.

Determination

Less than significant impact

2) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

The California State Scenic Highway System Map indicates that there are no existing or proposed county or State scenic highways in or near the Specific Plan Area (California Department of Transportation 2025). The nearest scenic highway, Angeles Crest Highway, is over nine miles northeast of the Specific Plan Area. The Specific Plan Area is not visible from this segment of the Angeles Crest Highway. Therefore, any future development project under the proposed Project would not result in any damage to scenic resources in a State scenic highway, and, as such, no impact would occur.

Determination

No impact

3) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The proposed Project would concentrate development in areas with opportunities for infill and intensification in a highly urbanized area. Any development project that would result from the implementation of the proposed Project would be consistent with City-related plans, policies, and regulatory requirements, described as follows.

The existing Specific Plan includes three land use designations: Industrial, Multi-family, and Commercial. The proposed Project includes various zones that correspond to the Specific Plan land uses, including Media District Limited Commercial (MDC-2), Media District General Business (MDC-3), Media District Commercial/Media Production (MDC-4), Media District Industrial (MDM-1), Media District Medium Density (MDR-3), and Media District High Density (MDR-4). Pursuant to the existing Burbank2035 General Plan land use designation, the maximum allowable FAR for Media District Commercial areas is 1.1, and the allowable density is 58 units per acre. New development in the Plan Area would be subject to a proposed FAR of 1.1 to 2.5 and allowable density of 27 units per acre to 87 units per acre. Hotels are limited to 2.97 rooms per 1,000 square feet of the total area of the lot. While increased density would occur in the Specific Plan Area, the proposed Project includes height transitions, height buffers, and massing standards aimed at addressing concerns over potential bulk and visual impacts of high-rise buildings, as discussed in Section 5.6 of the Specific Plan. Approval of the Project would include a General Plan Amendment to amend the land use designation in the Land Use Element, a Resolution by the City Council to adopt the proposed Project and a corresponding

zoning text amendment by the City would be required for the Project to be consistent with the General Plan. Additional analysis of consistency with the General Plan can be found in Section 4.9, *Land Use and Planning*, of this EIR. Therefore, while new housing and commercial and general business development would be added to the Specific Plan Area, new development would be consistent with applicable zoning and other regulations and the overall pattern of development in the City would be generally maintained. Additionally, pursuant to SB 743, the future aesthetic impacts of mixed-use residential, residential, or employment center projects on an infill site within a transit priority area (TPA) shall not be considered significant. Because the Specific Plan Area is within a TPA under the Southern California Association of Governments' Regional Transportation Plan/Sustainable Communities Strategy, and future development under the proposed Project would consist of mixed-use and high density residential infill development, aesthetic impacts would not be considered significant.

In addition, as stated in Section 5.6, *Objective Development Standards*, of the proposed Project, the Site Design standards encompass the arrangement of paving, landscape, fencing, and various other items typically found in surface areas around a building. The intent of these standards is to provide outdoor areas that would be people-oriented, avoid unsightly views of back of house and utility areas, provide high-quality treatment of all lot areas not occupied by buildings or structures, and contribute to a safe urban environment. Therefore, the proposed Project would establish design standards that would require additional regulations to govern the scenic quality in the Specific Plan Area.

Determination

Less than significant impact

4.19.2 Agriculture and Forestry

Appendix G of the *CEQA Guidelines* states that the agricultural and forestry resource impacts of a project are considered significant if the project would:

1) *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.*
2) *Conflict with existing zoning for agricultural use or a Williamson Act contract.*

The Specific Plan Area is not located on or near land mapped as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance mapped by California Department of Conservation's (DOC) Farmland Mapping and Monitoring Program (DOC 2024a). Likewise, according to the DOC, there are no Williamson Act contracts in the City (DOC 2024b). Moreover, Burbank's Zoning map indicates that no areas in the Specific Plan Area are currently zoned for agricultural use (City of Burbank 2019). Therefore, any future development project under the proposed Project would have no impact on the conversion of farmland to non-agricultural uses or conflict with existing zoning for agricultural use or a Williamson Act contract.

Determination

No impact

3) *Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).*

4) *Result in the loss of forest land or conversion of forest land to non-forest use.*

The Specific Plan Area is urbanized with no forest land or land zoned for forest land, timberland, or Timberland Production. As development under the proposed Project would be concentrated in the Specific Plan Area, none of the future development projects would result in developments that would create impacts to forest or timberland resources or result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

Determination

No impact

5) *Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.*

Consistent with the analysis under Thresholds 1 through 4, there would be no impacts associated with agricultural or forest lands. None of the future development projects under the proposed Project would involve other changes in the existing environment that could result in the conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest use. No impact would occur.

Determination

No impact

4.19.3 Air Quality

Appendix G of the *CEQA Guidelines* states that the air quality impacts of a project are considered significant if the project would:

4) *Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.*

The proposed Project would facilitate the creation of additional housing units and commercial and general business development in an urban area with existing residential and commercial uses. Construction activities for any future development project under the proposed Project may produce temporary odors from construction related activities, such as unburned hydrocarbons from tailpipes of construction equipment and architectural coatings. However, such odors would disperse rapidly from the respective construction sites. Furthermore, construction would be required to comply with the South Coast Air Quality Management District (SCAQMD) Rule 402, which regulates nuisance odors. With respect to operation related activities, the Project would not include land uses associated with odor complaints, such as agricultural uses, wastewater treatment plants, chemical and food processing plants, composting, refineries, landfills, dairies, and fiberglass moldings, as the intent of the Project would be to increase mixed-use and residential developments, which are not major sources of odors. Therefore, impacts related to odor would be less than significant.

Determination

Less than significant impact

4.19.4 Biological Resources

Appendix G of the *CEQA Guidelines* states that the biological resources impacts of a project are considered significant if the project would:

2) *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.*

3) *Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.*

The Specific Plan Area does not include any documented sensitive natural communities, including wetlands or riparian habitats. The 0.11-mile-long portion of the Los Angeles River that occurs along the southern boundary of the Specific Plan Area is channelized and not conducive to supporting riparian or wetland habitat. Any future development project under the proposed Project would occur in urbanized areas and, therefore, would not directly or indirectly impact sensitive natural communities, riparian habitat, or wetlands.

According to the Los Angeles River Master Plan, the Specific Plan Area lies within an existing potential habitat patch, which is defined as an area that may provide habitat and water for species, such as migratory birds, or is located near a strategic location, such as an existing habitat area buffer or linkage or confluence (Los Angeles County 2022b). However, the U.S. Fish and Wildlife Survey (USFWS) National Wetlands Inventory (NWI) does not indicate any additional aquatic resources within the Specific Plan Area. Any future development project in the Specific Plan Area with potential to impact the Los Angeles River would be required to comply with Section 1602 of the California Fish and Game Code (CFGC) and Sections 401 and 404 of the Clean Water Act (CWA). Adherence to these regulations would mitigate substantial adverse impacts to the Los Angeles River by requiring projects to obtain proper permitting, such as a National Pollutant Discharge Elimination System (NPDES) permit, and implement regulatory procedures, such as those identified in Stormwater Pollution Prevention Plans (SWPPPs). Therefore, impacts would be less than significant.

Determination

Less than significant impact

4) *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.*

Wildlife corridors are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as between foraging and denning areas, or they may be regional in nature, allowing movement across the landscape. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then subsequently return. Examples of barriers or impediments to movement include housing and other urban development, roads, fencing, unsuitable habitat, or open areas with little vegetative cover. Regional and local wildlife movements

are expected to be concentrated near topographic features that allow convenient passage, including roads, drainages, and ridgelines. The Specific Plan Area is urbanized, and as such, there are no known regional wildlife habitat linkages or described wildlife movement within the Specific Plan Area. Nursery sites are sites where wildlife concentrate for hatching and/or raising young, such as rookeries, spawning areas, and bat colonies. The Specific Plan Area is urbanized, and as such, does not provide native nursery site habitat.

The proposed Project focuses on redevelopment of infill sites in a highly urbanized area. The Specific Plan Area's urban environment generally does not facilitate the movement of wildlife species that are not adapted to urban and suburban areas. The Los Angeles River channel may act as an urban corridor for local wildlife movement, and migratory birds could utilize water within the concrete-lined channels during migration. The utilization of the Los Angeles River as an urban corridor or water source would not be affected by any future development project under the proposed Project because any development near the already-disturbed Los Angeles River channel would adhere to CFGC and CWA requirements and would not encroach into the Los Angeles River more than current conditions. Therefore, impacts would be less than significant.

Determination

Less than significant impact

6) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

The Specific Plan Area is not within an area subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved conservation plans. According to the Los Angeles River Master Plan, the Specific Plan Area lies within an existing potential habitat patch, which is defined as an area that may provide habitat and water for species, such as migratory birds, or is located near a strategic location, such as an existing habitat area buffer or linkage or confluence (Los Angeles County 2022b). However, none of the opportunity sites are situated near this potential habitat patch, as they are located in the northern and western portions of the Specific Plan Area and the Los Angeles River runs along the southern border of the Plan Area.

To ensure preservation of the potential habitat patch, the future development projects under the proposed Project would be required to comply with relevant regulatory requirements, including Section 1602 of the CFGC and Sections 401 and 404 of the CWA. Furthermore, there are no Habitat Conservation Plans, Natural Community Conservation Plans, or other approved habitat conservation plans applicable to the Specific Plan Area, and impacts would be less than significant.

Determination

Less than significant impact

4.19.5 Geology and Soils

Appendix G of the *CEQA Guidelines* states that the geology and soils resource impacts of a project are considered significant if the project would:

1) *Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault.*

The Specific Plan Area is in a seismically active region of Southern California. Fault rupture can occur along pre-existing, known active fault traces; however, fault rupture also can splay from known active faults or rupture along unidentified fault traces. The Specific Plan Area is not located within an Alquist-Priolo Earthquake Fault Zone, and no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Specific Plan Area. The nearest fault is the Hollywood Fault, located approximately three miles south of the Plan Area (DOC 2023). Since there are no known active or potentially active faults passing through the Specific Plan Area, the potential for on-site ground rupture due to movement of an underlying fault is low. Therefore, future development projects under the proposed Project would not directly or indirectly cause substantial adverse effects involving rupture of a known earthquake fault. Furthermore, future development projects would be required to comply with the seismic safety requirements in the latest California Building Code (CBC) applicable to future development projects at the time of plan submittal to the City. Impacts related to surface rupture of a known earthquake fault would be less than significant.

Determination

Less than significant impact

4) *Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.*

The geologic character of an area determines its potential for landslides. Steep slopes, the extent of erosion, and the rock composition of a hillside all contribute to the potential for slope failure and landslide events. To fail, unstable slopes need to be disturbed; common triggering mechanisms of slope failure include undercutting slopes by erosion or grading, saturation of marginally stable slopes by rainfall or irrigation; and, shaking of marginally stable slopes during earthquakes. The Specific Plan Area is an urbanized area that is relatively flat. According to the DOC Earthquake Zones of Required investigation map, no portion of the Specific Plan Area is a landslide zone (DOC 2023). Therefore, future development projects under the proposed Project would not directly or indirectly cause impacts related to landslides No impact related to landslides would occur.

Determination

No impact

8) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

The Specific Plan Area is served by a community wastewater system. The proposed Project would involve development of the opportunity sites identified for the proposed Project which are urban infill sites that are served by existing wastewater infrastructure. Future development under the proposed Project is not anticipated to include the use of septic systems. Therefore, there would be no impact related to the use of septic tanks or alternative wastewater disposal systems.

Determination

No impact

4.19.6 Hazards and Hazardous Materials

Appendix G of the *CEQA Guidelines* states that the hazards and hazardous materials resource impacts of a project are considered significant if the project would:

1) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

The proposed Project would accommodate infill residential and commercial development in an urbanized area of the City. Residential uses do not utilize hazardous materials and, thereby, pose minimal risk of exposing the public to hazardous materials. However, the introduction of 3,986,207 square feet of new commercial uses may result in an incremental increase in the use of hazardous materials and/or the generation of hazardous materials.

Exposure of persons to hazardous materials could occur in the following ways: improper handling or use of hazardous materials or hazardous wastes during construction or operation of future developments, particularly by untrained personnel; transportation accidents; environmentally unsound disposal methods; or fire, explosion, or other emergencies. The types and amounts of hazardous materials would vary according to the nature of the activity. In some cases, it is the type of material that is potentially hazardous; in others, it is the amount of material that could present a hazard.

Although the overall quantity of hazardous materials and waste generated in the Specific Plan Area could incrementally increase under the proposed Project, all new development projects that handle or use hazardous materials would be required to comply with all applicable local, state and federal laws related to storage, use, and disposal of hazardous materials, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, CCR Title 22, California Fire Code, and guidelines established by the United States Environmental Protection Agency.

As required in the California Health and Safety Code Division 20, Chapter 6.95, *Hazardous Materials Release Response Plans and Inventory*, all businesses that handle or necessitate transportation of hazardous materials in excess of the threshold quantities (55 gallons [liquid], 200 cubic feet [gas], or 500 pounds [solid]) are required to prepare and submit a hazardous materials business plan to a regulating agency. Specifically, any new business that meets the specified criteria must submit a full hazardous materials disclosure report that includes an inventory of the hazardous materials generated, used, stored, handled, or emitted; and emergency response plans and procedures to be used in the event of a significant or threatened significant release of a hazardous material. The plan needs to identify the procedures to follow for immediate notification to all appropriate agencies and

personnel in the event of a release, identification of local emergency medical assistance appropriate for potential accident scenarios, contact information for all company emergency coordinators of the business, a listing and location of emergency equipment at the business, an evacuation plan, and a training program for business personnel. The Los Angeles County Fire Department, as the designated Certified Unified Program Agency (CUPA), conducts yearly inspections of all such businesses to confirm that their business plan is in order and up to date.

Because implementation of the proposed Project would primarily result in urban infill and redevelopment and intensification of development, existing structures may need to be demolished prior to the construction of new buildings. Demolition of existing structures in the Specific Plan Area could result in exposure of construction personnel and the public to hazardous substances, such as asbestos or lead-based paints. Long-term risks to occupants of buildings could result from other contaminants released from the soil, such as trichloroethylene, perchloroethylene, or nitrate (in the form of NO_3) which may be released via plume (Los Angeles Department of Water and Power 2015a; 2015b; 2015c). In addition, disturbance of plugged, abandoned, and unrecorded oil and gas wells could result in the release of hazardous materials into the environment. Lastly, the accidental spillage or leakage of hazardous materials during their transport, use, storage, or disposal could result in the exposure of construction personnel and the public to health or safety risks. However, construction and operation of commercial uses associated with future development projects under the proposed Project would comply with the California Code of Regulations and the requirements of the California Division of Occupational Safety and Health, City of Burbank Fire Department, Los Angeles County Fire Department, and other agencies to ensure hazardous materials risks to the public are minimized.

Compliance with updated Burbank2035 General Plan Safety Element policies would minimize risks associated with routine use, transport, handling, storage, and disposal of hazardous materials. Oversight by the appropriate federal, State, and local agencies and compliance with applicable regulations related to the handling and storage of hazardous materials would also minimize the risk of public exposure to these substances. Therefore, this impact would be less than significant.

Determination

Less than significant impact

5) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Safety hazards associated with airports are generally related to the construction of tall structures that could interfere with flight paths, or with increasing the number of people working or residing in potential crash zones. The Specific Plan Area is not within or near any Airport Influence Area defined by the Los Angeles County Airport Land Use Plan, including the Hollywood Burbank Airport (Los Angeles County Airport Land Use Commission 2004). Therefore, development within the Specific Plan Area would not be at risk of airport-related hazards or excessive noise, and implementation of the proposed Project would not result in safety hazards in the airport vicinity. Potential impacts would be less than significant.

Determination

Less than significant impact

4.19.7 Hydrology and Water Quality

Appendix G of the *CEQA Guidelines* states the hydrology and water quality resource impacts of a project are considered significant if the project would:

1) *Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality.*

Construction of future development projects under the proposed Project could potentially impact surface or ground water quality due to erosion resulting from exposed soils and the generation of water pollutants, including trash, construction materials, and equipment fluids.

The City of Burbank is within the jurisdiction of the Los Angeles Regional Water Quality Control Board, which is responsible for the preparation and implementation of the water quality control plan for the Los Angeles Region. Title 9, Chapter 3, Section 9-3-414 of the BMC, Storm Water Pollution Control Measures for Development Planning, requires owners or developers to implement stormwater pollution control requirements for construction activities. In addition, regulations under the federal Clean Water Act require compliance with the NPDES storm water permit for projects disturbing one or more acres during construction. Operators of a construction site would be responsible for preparing and implementing a SWPPP that outlines project-specific BMPs to control erosion, sediment release, and otherwise reduce the potential for discharge of pollutants in stormwater. Typical BMPs include covering stockpiled soils, installation of silt fences and erosion control blankets, and proper handling and disposal of waters. Compliance with these regulatory requirements would minimize impacts to water quality during the construction of future development projects under the proposed Project.

Compliance with the regulations described above (i.e., BMC, SWPPP, and applicable BMPs) would reduce impacts resulting from future development projects under the proposed Project to a less-than-significant level. Therefore, implementation of the proposed Project would not violate any water quality standards or waste discharge requirements. Impacts would be less than significant.

Determination

Less than significant impact

3.i) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site.*

The identified opportunity sites for development under the proposed Project are primarily paved and/or previously developed with structures. Therefore, development under the proposed Project would not be anticipated to substantially alter drainage patterns or alter drainage patterns to an extent that would result in substantial erosion, siltation, or flooding on- or off-site.

As discussed under Threshold 1, future construction activities would be required to include BMPs to prevent stormwater contamination and reduce runoff, pursuant to Title 9, Chapter 3, Section 9-3-414 of the BMC, Storm Water Pollution Control Measures for Development Planning, and potentially the NPDES Construction General Permit depending on the size of future development projects. BMPs and a Standard Urban Storm Water Mitigation Plan, as required by Section 9-3-413 of the BMC, would be implemented for future development projects to reduce polluted runoff by retaining, treating, or infiltrating polluted runoff on-site, and integrate post construction BMPs into a site's overall drainage system. These construction and erosion control practices would reduce the potential for adverse

effects caused by excavation and general construction. Furthermore, the uses associated with the proposed Project (i.e., residential and commercial) would not be sources of high levels of stormwater pollution upon operation. The majority of the Specific Plan Area is not located within a 100-year flood hazard area and one minor southern portion of the Specific Plan Area is located within Flood Zone A contained within the Los Angeles River channel (Federal Emergency Management Agency [FEMA] 2008). Flood Zone A is considered a Special Flood Hazard Area and has a one percent annual chance of experiencing a major flood, which is considered a 100-year flood hazard area. Because the portion of the Specific Plan Area within a 100-year flood hazard area is entirely contained within the Los Angeles River channel, the proposed Project would not place housing or structures in a flood hazard area, such that flood flows would be impeded or redirected. Therefore, future development projects under the proposed Project would not substantially alter the existing drainage pattern of the Specific Plan Area in a manner that would result in substantial erosion or siltation on- or off-site; increase the rate or amount of surface runoff that would result in flooding on- or off-site; or impede or redirect flood flows. Impacts would be less than significant.

Determination

Less than significant impact

3.ii) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

As discussed under Threshold 3i, the majority of the Specific Plan Area is not located within a 100-year flood hazard area, and one minor southern portion of the Specific Plan Area is located within Flood Zone A contained within the Los Angeles River channel (FEMA 2008). Flood Zone A is considered a Special Flood Hazard Area and has a one percent annual chance of experiencing a major flood, which is considered a 100-year flood hazard area.

As discussed under Threshold 1, future construction activities would be required to include BMPs to reduce runoff, pursuant to Title 9, Chapter 3, Section 9-3-414 of the BMC, Storm Water Pollution Control Measures for Development Planning, and potentially the NPDES Construction General Permit depending on the size of future development projects.

Future development projects under the proposed Project would be primarily infill in nature and would, therefore, only create an incremental expansion in the quantity of net new impervious surfaces, and as such, sheet flow or other runoff types would not be altered. Since future development projects under the proposed Project would not substantially alter the existing drainage pattern and the development or construction of future projects would be required to implement stormwater BMPs, future development projects under the proposed Project would not generate a substantial increase in runoff which would result in flooding on- or off-site. Therefore, future development projects under the proposed Project would not substantially alter the existing drainage pattern of the Specific Plan Area in a manner that would increase the rate or amount of surface runoff that would result in flooding on- or off-site. Impacts would be less than significant.

Determination

Less than significant impact

3iii) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Future development projects under the proposed Project would be primarily infill in nature and would, therefore, only create an incremental expansion in the quantity of net new impervious surfaces, and as such, sheet flow or other runoff types would not be altered. Since future development projects under the proposed Project would not substantially alter the existing drainage pattern and the development or construction of future projects would be required to implement stormwater BMPs, future development projects under the proposed Project would not generate a substantial increase in runoff such that the capacity of existing or planned stormwater drainage systems are exceeded. The proposed Project would not result in development that would create drainage impacts. Impacts would be less than significant.

Determination

Less than significant impact

3iv) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows.

As discussed in Section 4.8, *Hydrology and Water Quality*, the majority of the Specific Plan Area is not located within a 100-year flood hazard area, and one minor southern portion of the Specific Plan Area is located within Flood Zone A contained within the Los Angeles River channel (FEMA 2008). Flood Zone A is considered a Special Flood Hazard Area and has a one percent annual chance of experiencing a major flood, which is considered a 100-year flood hazard area.

Because the portion of the Specific Plan Area within a 100-year flood hazard area is entirely contained within the Los Angeles River channel, the proposed Project would not place housing or structures in a flood hazard area, such that flood flows would be impeded or redirected. Therefore, foreseeable future development projects under the proposed Project would not substantially alter the existing drainage pattern of the Specific Plan Area in a manner that would impede or redirect flood flows. Impacts would be less than significant.

Determination

Less than significant impact

4) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

Seiches are large waves generated by ground shaking effects within enclosed bodies of water. Four reservoirs or dams surround the City of Burbank: Devil's Gate Dam, Reservoir 1, Reservoir 4, and Reservoir 5. However, these reservoirs impound[1] more than 50 acre-feet of water and are not considered large enough to result in considerable risk of inundation in Burbank from failure of any of

[1] Reservoir impoundment is a basin constructed in the valley of a stream or river with the purpose of holding stream flow so that the stored water may be used when supply is insufficient.

the facilities (City of Burbank 2022). Therefore, potential impacts associated with flooding from a seismically induced seiche would not be significant.

Tsunamis are tidal waves generated by fault displacement or major ground movement. Since Burbank is located over 15 miles inland from the Pacific Ocean, tsunamis are not considered a hazard for the Specific Plan Area.

As described above, a portion of the Specific Plan Area lies within a 100-year flood hazard area contained by the Los Angeles River channel. Future development projects under the proposed Project would be concentrated on infill sites and would not increase the risk of released pollutants due to inundation. The transport, use, and storage of hazardous materials during the construction and operation of development accommodated under the proposed Project would be conducted in accordance with all applicable State and federal laws, including the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22; thereby reducing potential pollutants via inundation or flooding. The proposed Project would increase development capacity, thereby potentially increasing the number of people and structures exposed to potential flooding. While there is the potential for flooding to impact portions of the Specific Plan Area, particularly during major storm events, future development projects under the proposed Project would include residential and commercial spaces, which are considered to be low risk regarding the storage or use of significant quantities of hazardous materials. Therefore, risks related to the release of hazardous materials due to inundation are minimal, and impacts would be less than significant.

Determination

Less than significant impact

4.19.8 Land Use and Planning

Appendix G of the *CEQA Guidelines* states that the land use and planning impacts of a project are considered significant if the project would:

1) Physically divide an established community.

Implementation of the proposed Project would prioritize future development projects on infill sites in already developed areas of the Specific Plan Area. Since the Specific Plan Area is built out, if new roads are required for future development projects under the proposed Project, they would either be short public roads to facilitate access to a site or private streets within a proposed development project. Therefore, future development projects under the proposed Project are not anticipated to involve the construction of new roads, railroads, or other features that may physically divide established communities in the Specific Plan Area. As discussed in Section 2, *Project Description*, the goals, policies, and objectives under the proposed Project would place a greater emphasis on encouraging high quality, more contextually compatible development in the Specific Plan Area and would not result in development that would divide an established community. No impact would occur.

Determination

No impact

4.19.9 Mineral Resources

Appendix G of the *CEQA Guidelines* states that the mineral resource impacts of a project are considered significant if the project would:

1) *Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.*
2) *Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.*

The California Surface Mining and Reclamation Act of 1975 (SMARA) was enacted to promote conservation and protection of significant mineral deposits. SMARA requires the State to identify and classify mineral deposits within the State as (1) containing little or no mineral deposits (Mineral Resource Zone-1 or MRZ-1), (2) significant deposits (MRZ-2), or (3) deposits identified but further evaluation needed (MRZ-3 and MRZ-4). According to the DOC Mineral Land Classification Maps, the Specific Plan Area is classified as MRZ-3, which indicates that the area contains identified mineral resources of undetermined mineral resource significance (California Geological Survey 2024). Nonetheless, future development projects under the proposed Project would primarily occur in existing commercial and residential areas, which are not compatible with or used for mineral extraction. It is not anticipated that future development projects under the proposed Project would occur on land presently in use for mineral extraction or on a locally-important mineral resource recovery site. Therefore, the proposed Project would not result in a loss of availability of a known mineral resource or a locally-important mineral resource recovery site, and no impact would occur.

Determination

No impact

4.19.10 Noise

Appendix G of the *CEQA Guidelines* states that the noise impacts of a project are considered significant if the project would:

3) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the proposed Project expose people residing or working in the Plan Area to excessive noise levels?*

The Specific Plan Area is not within or near any Airport Influence Area defined by the Los Angeles County Airport Land Use Plan, including the Hollywood Burbank Airport (Los Angeles County Airport Land Use Commission 2004). Because the Specific Plan Area is not located within any airport's Airport Influence Area or the 65 CNEL or higher noise contours, future development projects under the proposed Project would not expose people residing or working in the Specific Plan Area to excessive noise levels. Therefore, no impact would occur.

Determination

No impact

4.19.11 Population and Housing

Appendix G of the *CEQA Guidelines* states that the population and housing impacts of the project are considered significant if the project would:

2) *Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.*

Future development projects under the proposed Project would involve new residential and commercial uses on infill sites, which could potentially result in the displacement of some existing housing units and residents. However, goals, policies, and objectives included in the proposed Project aim to avoid displacement and promote housing stability. In addition, the proposed Project would increase opportunities for housing by expanding areas where housing is allowed. Future housing development would be concentrated near the opportunity sites identified in the proposed Project, which would accommodate up to 9,702 residential units throughout the planning period, and it is anticipated that any replacement housing need created by displacement of existing housing would be offset through future mixed-use and residential development under the proposed Project. Therefore, impacts would be less than significant.

Determination

Less than significant impact

4.19.12 Recreation

Appendix G of the *CEQA Guidelines* states that an impact to recreational facilities associated with a project are considered significant if the project would:

2) *Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.*

According to the Burbank2035 General Plan Open Space and Conservation Element, the City of Burbank contains approximately 2,700 acres of designated open space, including approximately 700 acres of improved parkland. As discussed in Section 2, *Project Description*, development accommodated by the proposed Project would add an estimated 24,226 residents to the City. The anticipated population increase associated with the proposed Project would increase the total City population from 105,603 residents to approximately 128,500 residents and would decrease the existing parkland ratio of 6.96 acres per 1,000 residents to 5.65 acres per 1,000 residents. This ratio is a decrease from the current ratio; however it would still meet the City's goal of five acres of parkland per 1,000 residents.

Policies 2.2, 2.4, and 3.1 and Programs OSC-2 and LU-8 in the Burbank2035 General Plan Open Space and Conservation Element and Land Use Element, would ensure that adequate parks and recreational facilities are provided to accommodate the anticipated increase in new residents. Policy 2.2 establishes a standard to provide a community or neighborhood park within ½ mile of all residences in the City. Policy 2.4 encourages the City to provide additional types of park facilities, such as pocket parks, dog parks, athletic fields, amphitheaters, gardens, and shared facilities. Policies 3.1 through 3.6 provide specific guidance to the City to maintain existing parks and recreation facilities by rehabilitating facilities, installing improvements (e.g., field lighting). Program OSC-2 requires the development of a Park, Recreation, and Community Services Master Plan (Master Plan), which would direct long-term acquisition, operation, management, and programming for parks, open spaces, and recreation facilities. The Master Plan is intended to guide the in-lieu fee structure for the acquisition

and management of recreation land in connection with the development review process. Program LU-8 requires review and compliance with the community facilities fee program to ensure that new development adequately offsets impacts related to fire, police, library, and park and recreation services recreational facilities.

In addition, developers of the residential development projects associated with the proposed Project would be required to pay the City's park facility development fee as required by BMC Section 9-4-1-1103. The proposed Project would provide opportunities for recreation through implementation of Policy 1.1, which states the following:

> **Policy 1.1:** Accommodate a mix of residential and non-residential land uses in appropriate locations that support the diverse needs of Burbank residents, businesses, and visitors. Provide opportunities for living, commerce, employment, recreation, education, culture, entertainment, civic engagement, and socializing.

These BMC regulations and proposed Project policy are intended to maintain existing levels of service for park and recreation facilities for both existing and new residents. Increased demand associated with a corresponding increase in population would not require construction of new or expanded parks and recreation facilities because development would be required to pay the applicable park facility development fees, which would fund future development of new or expanded parks and recreation facilities. While impact fees are required for developers to support the addition of recreational facilities such as parks, the proposed Project would not directly introduce or expand existing recreational facilities that would affect the environment. Therefore, impacts would be less than significant.

Determination

Less than significant impact

4.19.13 Transportation

Appendix G of the *CEQA Guidelines* states that the transportation impacts of a project are considered significant if the project would:

1) *Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.*

The proposed Project would establish updated development standards to facilitate the projected development of up to 9,702 residential units, 3,986,207 square feet of commercial and general business development, and 400 hotel rooms in addition to what is already allowed under the current zoning and land use regulations. This development would include medium- to high-density residential, mixed-used residential, and commercial development. and up to 400 hotel rooms.

The Specific Plan Area includes the Metrolink Pink Route, which runs east to west from Downtown Burbank, along W. Olive Avenue, S. Buena Vista Street, Bob Hope Drive, and Hollywood Way, and ends outside of the Specific Plan Area at Universal Studios. Additionally, two Class III bike lanes line the eastern and western borders of the Specific Plan Area, and one Class III bike lane serves the northern section of the Specific Plan Area. Due to the increased demand for transportation infrastructure from future development within the Specific Plan Area, the proposed Project includes several policies that encourage multi-modal transportation and improve safety features for pedestrians, including:

- Increase access for people walking in the neighborhood.
- Maximize pedestrian safety while ensuring safe interaction between all modes of transportation.
- Assess the City's inventory of curb ramps within the Media District to ensure they are up-to-date with current ADA standards and install updated ramps where needed.
- Provide a bicycle network that connects major destinations including commercial area, employment centers, and residential neighborhoods.
- Maximize bicycle safety including providing separation between bicyclists and motorists whenever technically feasible.
- Improve transit connections with nearby communities and major regional destinations.
- Ensure local transit is reliable and provides high quality service to major local destinations.

These policies align with those outlined in Section 4.15, *Transportation*, of this EIR, as well as the Burbank2035 Mobility Element, which requires the City to improve Burbank's alternative transportation access to local and regional destinations through land use decisions that support multi-modal transportation. Therefore, conflicts with existing policies or ordinances related to the City's circulation system would not be anticipated and impacts would be less than significant.

Determination

Less than significant impact

3) *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).*

The proposed Project encourages building designs that are human scaled, provide interest at the ground floor, and provide easy access from the sidewalk to encourage walkability and activate the Specific Plan Area's public realm. Therefore, the proposed Project would not introduce new uses that would result in hazards due to incompatible use. The roadways adjacent to the Specific Plan Area are part of the urban roadway network and contain no sharp curves or dangerous intersections. Nonetheless, development under the proposed Project could introduce hazards and conflicts between pedestrians and vehicles.

Chapter 8, Mobility & Public Realm, of the proposed Project includes the following policies which would ensure safety for pedestrians, bicyclists, transit riders, and motorists within the Specific Plan Area:

> **Policy 1.1:** Create a multimodal, active, engaged, human- oriented streetscape network, where the private automobile is not viewed as the only mode of travel.
>
> **Policy 2.1:** Support future development that creates greater access to alternate modes of transportation and therefore reduce reliance on personal vehicles by making walking, biking, and public transit more accessible, comfortable, safe, and convenient.
>
> **Policy 3.1:** Improve safety for all modes of transportation with an emphasis on the most vulnerable modes.
>
> **Pedestrian Infrastructure Policy 1.0:** Increase access for people walking in the neighborhood.
>
> **Pedestrian Infrastructure Policy 3.0:** Maximize pedestrian safety while ensuring safe interaction between all modes of transportation.
>
> **Bicycle Infrastructure Policy 2.0:** Eliminate first-mile/last-mile mobility gaps and barriers.

Bicycle Infrastructure Policy 3.0: Maximize bicycle safety including providing separation between bicyclists and motorists whenever feasible.

Transit Infrastructure Policy 1.0: Enhance safety, accessibility, and cleanliness at transit stops and routes.

Motor Vehicle Infrastructure Policy 3.0: Ensure safe interaction between all modes of travel.

The proposed Project includes multiple new bikeways and bicycle lane improvements which would improve cyclist comfort, connectivity, and accessibility in the Specific Plan Area, while reducing traffic congestion. Future developments would be reviewed by the appropriate City staff to ensure consistency with all applicable City and State design standards, including standards for project access points, location, and design, sight lines, roadway modifications, provisions for bicycle and pedestrian transportation connections, and emergency access. Therefore, with implementation of the proposed new bikeways and bicycle lane improvements and City review, impacts related to increased hazards due to a geometric design feature or incompatible uses would be less than significant.

Determination

Less than significant impact

4) Result in inadequate emergency access.

The proposed Project would improve connectivity and mobility throughout the Specific Plan Area through implementation of the Mobility & Public Realm policies described above and transportation demand management (TDM) strategies and policies that are designed to reduce roadway congestion and enhance mobility for all modes of transportation. The primary TDM strategy of the proposed Project is a transportation management organization (TMO) which is a private-sector, non-profit organization whose mission is to reduce peak-hour congestion and address mobility challenges by providing commute-related services directly to its members and their employees. The City's existing TMO requires that employers with 25 or more employees in the Specific Plan Area reduce the number of employee automobile trips their businesses generate, join the TMO, and pay membership fees. Through implementation of the proposed Project, the City would have the opportunity to align transportation management requirements with best practices by reassessing which businesses are subject to TMO regulations, defining membership criteria and fees, evaluating available TDM strategies, specifying reporting and performance measurement standards, and determining funding needs. The policies described above, continued implementation of the City's TMO strategy, and implementation of the proposed bicycle and pedestrian infrastructure improvements described above; and the improved connectivity and mobility they would help create would contribute to improving emergency access throughout the Specific Plan Area. In addition, emergency access associated with future development projects would be analyzed and evaluated in detail through the City review process for those individual projects. The City's emergency access standards would apply to all future development projects under the proposed Project. Plans for future development projects under the proposed Project would also be subject to the BFD review for adequate fire access. Therefore, with respect to inadequate emergency access, impacts related to implementation of the proposed Project would be less than significant.

Determination

Less than significant impact

4.19.14 Utilities and Service Systems

Appendix G of the *CEQA Guidelines* states that the utilities and service system impacts of a project are considered significant if the project would not:

5) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

A significant impact could occur if the policies established by the proposed Project would conflict with any statutes and regulations governing solid waste. In compliance with State legislation, any future development project under the proposed Project would be required to implement a Solid Waste Diversion Program and divert at least 75 percent of the solid waste generated from the applicable landfill site.

Future development projects under the proposed Project would comply with federal, State, and local statutes and regulations related to solid waste, such as the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939), mandatory commercial recycling (AB 341, AB 1826), organics diversion under Senate Bill 1383 (SB 1383), and the City's recycling program. AB 939 established the Integrated Waste management Board, required the implementation of integrated waste management plans, and mandated that local jurisdictions divert at least 50 percent of all solid waste generated. Since adoption of AB 939, the diversion requirements have been updated to 75 percent and is now measured in terms of per-capita disposal expressed as pounds per person per day. AB 341 requires commercial solid waste recycling and sets a statewide goal for 75 percent disposal reduction by the year 2020. The purpose of SB 1383, enacted in 2020, is to continue the statewide goal of a 75 percent disposal reduction with an extended goal year of 2025. AB 1826 requires that businesses recycle their organic waste and that local jurisdictions have organic waste recycling programs for businesses, including multi-family residential developments with five or more units. Since future development projects under the proposed Project would comply with applicable federal, State, and local regulations involving solid waste, impacts related to conflict with statutes and regulations governing solid waste would be less than significant.

Determination

Less than significant impact

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5 Other CEQA Required Discussions

This section discusses growth-inducing impacts, irreversible environmental impacts, and significant and unavoidable impacts that would be caused by the proposed Project.

5.1 Growth Inducement

Section 15126(d) of the *CEQA Guidelines* requires a discussion of a project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The proposed Project's growth-inducing potential is, therefore, considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

5.1.1 Population Growth

For the baseline conditions, in accordance with *CEQA Guidelines* Section 15125, "a lead agency may define existing conditions by referencing historic conditions, or conditions expected when the project becomes operational, or both, that are supported with substantial evidence" where necessary to provide the most accurate description of the existing conditions. As such, due to the preparation time needed to complete the Draft Specific Plan and Draft EIR, this section utilizes the Southern California Association of Governments (SCAG) 2024-2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) and 2024 population, housing, and employment data from the DOF.

Future development projects under the proposed Project would generate population growth due to the introduction of additional employment and housing opportunities in the Specific Plan Area. Considering the most conservative population growth forecast that would result from implementation of the proposed Project, if under the proposed Project all projected housing units were built and all employment opportunities were filled, there would be a population increase of 24,226 persons based on an average household of 2.38 persons for Burbank, which would increase the population to 129,829 (DOF 2024). Although the SCAG 2024-2050 RTP/SCS was adopted in April 2024, the RTP/SCS utilizes baseline population, housing, and employment data from 2019, as this was the most recent data available at the time of preparation. At the City level, population forecasts are not provided by SCAG; as such, the following analysis focuses on the potential impacts associated with growth in population, housing and employment in the Specific Plan Area.

As discussed under Section 4.12, *Population and Housing,* of this EIR*,* the anticipated number of housing units under the Burbank 2021-2029 Housing Element is 10,011 units to accommodate the City's forecasted population growth under the Downtown TOD Specific Plan and GSSP, which contain the Housing Element Opportunity Sites. However, the estimated growth under the analysis for the Housing Element EIR was changed to 10,456 units to account for the 2029 interpolated housing growth assumed under the two Specific Plans along with the City's Regional Housing Needs Assessment (RHNA) allocation. The addition of these units results in a total city-wide residential count of 55,525 units. As such, the additional residential units under the proposed Project are not included in the City's current Housing Element. Under the Land Use Element, the established Citywide cap on the number of housing units is 61,647 units. This total of 61,647 units, minus the 55,525 units

accounted for under the 2021-2029 Housing Element, results in 6,122 units of growth that is not accounted for in the Housing Element. Therefore, the addition of 9,702 units under the proposed Project would exceed the City's estimated growth under the Housing Element.

As shown in Table 4.12-2 in Section 4.12, *Population and Housing*, of this EIR, SCAG forecasts 48,600 housing units in 2035. Based on the proposed Project's introduction of 9,702 additional housing units and the existing 46,457 housing units in Burbank, the proposed Project would exceed SCAG's 2035 housing forecast by 7,559 units. Therefore, the proposed Project would also result in housing growth in comparison to SCAG's RTP/SCS, which would result in a potentially significant impact associated with population growth. Although development under the proposed Project would exceed the City's and SCAG's estimated housing growth, the overall vision of the proposed Project (refer to Chapter 5, *Vision and Overarching Goals*) is to address current issues facing the Specific Plan Area, such as housing supply and affordability, transportation infrastructure, and safety, by encouraging contextual transit-oriented development in the center of the Specific Plan Area around existing and future transit opportunities. In addition, the proposed Project would guide land use and development decisions through the objective design standards and implementation strategies. As such, the overall purpose of the proposed Project is to identify areas for development in the Specific Plan Area and provide the means to accommodate the growth. Therefore, future development under the proposed Project would not result in significant population and housing impacts under CEQA.

According to the Focused Sewer Capacity Analysis prepared for the proposed Project by the City of Burbank Public Works Department in September 2025, the proposed Project would result in approximately 3.8 miles of gravity mains that require upsizing to accommodate the City's planned growth (Appendix H). The BWRP currently has limited remaining capacity with the ability to treat sewer inflows at an average rate of approximately 8.5 million gallons per day (MGD). The Focused Sewer Capacity Analysis also determined that the additional wastewater flows generated by development under the proposed Project would result in approximately 3.07 MGD of wastewater inflows to the BWRP, which would account for approximately 36 percent of the current BWRP daily rate of 8.5 MGD.
Therefore, the proposed Project would result in additional wastewater flows that would account for a large portion of the existing daily rate of the BWRP and would require substantial facility improvements to accommodate this additional wastewater flow.

Additional capital improvement projects would be required to increase BWRP capacity to handle the majority of future flows from the proposed Project. During certain periods when the capacity enhancements would be constructed at BWRP, it may be necessary to divert flow to the City of Los Angeles' North Outfall Sewer pipeline (LA NOS). However, long-term diversion to the LA NOS is not feasible due to regulatory and contractual constraints, as well as the increased diversion cost, which would include both sewer facilities charges and annual charges and is estimated to be approximately $60 million over ten years. Potential future improvements to increase the treatment capacity of the BWRP would require upgrades to the headworks, the addition of new primary clarifiers, modifications to the secondary treatment process, and expansion of the equalization basins (beyond the near-term 10-year planning horizon). Options for improving BWRP's secondary treatment processes could include either conversion to a membrane bioreactor or expansion of the BWRP's conventional secondary treatment facilities. BWRP's tertiary sand filters and chlorine contact tanks have relatively more capacity than the expansion processes listed above and are currently not the limiting processes in the treatment train. Additionally, BWRP expansion would likely require the City to acquire new land to build some of these improvements due to limited space in the current BWRP property. Although proposed mitigation measures would help to reduce potential impacts relating to wastewater conveyance and capacity, Public Works determined that the necessary capital improvements to

reduce potential impacts to a level of less than significant would not be fully implemented within the proposed Project's 10-year planning horizon due to high costs and operational challenges during construction of improvements. While the proposed Project supports the City's housing and employment goals as outlined in the Burbank2035 General Plan, the existing wastewater infrastructure would not be suitable for the demand expected from future development projects under the proposed Project resulting in indirect impacts associated with population growth.

5.1.2 Economic Growth

Future development projects under the proposed Project would generate temporary employment opportunities during construction. Because construction workers would be expected to be drawn from the existing regional work force, construction associated with future development under the proposed Project would not be growth-inducing from a temporary employment standpoint. However, long-term employment opportunities would increase due to the commercial development anticipated under the proposed Project.

As discussed in Section 4.12, *Population and Housing*, the SCAG 2024-2050 RTP/SCS forecasts approximately 144,600 jobs in the City by 2035. The future development projects under the proposed Specific Plan would increase employment from approximately 127,800 to 135,601 jobs (SCAG 2024). This estimated increase in employment opportunities would support the City's goals related to economic growth and provide mixed-density and mixed-housing types in commercial corridors. Therefore, the job growth under the proposed Project would not exceed SCAG's projected employment growth. Moreover, the potential environmental effects associated with any future development projects in the Specific Plan Area are addressed as part of this EIR and would be addressed as part of a CEQA environmental review, as necessary, for development projects that may require additional environmental analysis.

5.1.3 Removal of Obstacles to Growth

The purpose of the proposed Project is to expand the goals, guidelines, policies, programs, and direction to reflect current needs of the community, while preserving the original intent of the existing Specific Plan to encourage compatible design with the community's character. The proposed Project aims to continue to preserve and protect surrounding residential neighborhoods, while providing sufficient opportunities to integrate land use and mobility strategies to facilitate the long-term sustainability and growth of businesses, bolster the employment base, and create new opportunities for affordable and workforce housing for all economic segments of the community. Therefore, implementation of the proposed Project would foster increased growth in the Specific Plan Area beyond the development anticipated under the existing Specific Plan.

As discussed in Section 4.17, *Utilities and Service Systems*, development under the proposed Project would exceed the City's current capacities associated with wastewater, which would require substantial facility improvements to accommodate population growth under the proposed Project and would result in significant and unavoidable impacts. As specific development projects are proposed and evaluated, however, General Plan Land Use Element Policy 2.3 would require developers to pay their fair share for infrastructure improvements as needed to serve their project and ensure that needed infrastructure and services are available prior to or at project completion. This may include the requirement that the developer pays for and performs the necessary sewer infrastructure upgrades, per Burbank Municipal Code Section 8-1-304, which would potentially remove obstacles to growth.

5.2 Irreversible Environmental Effects

Section 15126.2(d) of the *CEQA Guidelines* requires a discussion of any significant irreversible environmental changes that would be caused by the proposed Project. Specifically, Section 15126.2(d) states:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified. Resources that would be consumed as a result of construction and operation of future development projects under the proposed Project include water, electricity, natural gas, and fossil fuels.

As discussed in Section 4.5, *Energy*, all future development projects under the proposed Project would be required to comply with standards set in the latest iteration of the California Building Standards Code, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources by the built environment during operation. The CALGreen Code requires implementation of energy-efficient light fixtures and building materials into the design of new construction projects.

Construction activities related to future development projects under the proposed Specific Plan would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobile and construction equipment. However, use of such resources by construction activities associated with development in the Specific Plan Area would not be unusual compared to other construction projects.

With respect to operational activities, compliance with all applicable energy and building codes, would ensure that natural resources are conserved or recycled to the maximum extent feasible. While consumption of natural resources in the Specific Plan Area would increase with implementation of the proposed Project due to development and associated population increases, it is also likely that in response to GHG reduction mandates, new technologies or systems would emerge or would become more cost-effective or user-friendly, which would further reduce the City's reliance upon nonrenewable natural resources. Therefore, implementation of the proposed Project would not result in a large commitment of natural resources or in significant irreversible environmental changes.

5.3 Significant and Unavoidable Adverse Impacts

Public Resources Code Section 21100(b)(2) and the CEQA Guidelines Section 15126.2(c) require EIRs to include a discussion of the significant environmental effects that cannot be avoided if the proposed Project is implemented. As documented in Section 4, *Environmental Impact Analysis*, of this EIR after implementation of the recommended mitigation measures, most of the impacts associated with the proposed Project would be reduced to a less-than-significant level.

Although the proposed Project would result in significant and unavoidable impacts related to air quality, cultural resources, noise, transportation, and utilities and service systems, as detailed below, the proposed Project is intended to focus on developing and implementing policies and programs to

remove barriers to housing production, streamline the permitting process, and introduce objective design standards for new development within the Specific Plan Area.

The following impacts are considered significant and unavoidable; that is, no feasible mitigation is available to reduce these impacts to a less-than-significant level:

5.3.1 Air Quality

- **Impact AQ-1:** Development under the proposed Project would exceed the planned growth under the Burbank2035 General Plan and SCAG's 2024-2050 RTP/SCS. In addition, the proposed Project would result in significant indirect impacts due to population growth. The proposed Project would, therefore, conflict with the growth assumptions or policies of applicable air quality plans such as SCAQMD's 2022 AQMP. Because there are no mitigation measures available to reduce the significant impacts related to population and housing growth, the proposed Project is unable to meet consistency with AQMP growth projects. Impacts would be significant and unavoidable.
- **Impact AQ-2:** Construction activities and operation of development under the proposed Project would result in a cumulatively considerable net increase of any criteria pollutant for which the region is a non-attainment area under applicable federal or State ambient air quality standards. Air quality studies and project-specific emissions reduction measures would be required for large projects proposed under the proposed Project. Mitigation Measure AQ-1 would require air quality analysis and appropriate emissions reduction measures for projects that exceed the screening criteria, such as those with extensive grading, demolition, or other activities requiring soil disturbance, consistent with SCAQMD Rule 403. Additionally, projects with large amounts of heavy-duty construction equipment would require an air quality analysis and appropriate mitigation. In addition, subsequent analysis and mitigation would be required for any project with reasonable potential to generate criteria pollutant emissions that exceed SCAQMD thresholds. However, specific reduction in emissions below the SCAQMD significance thresholds cannot be demonstrated in the absence of specific project details to assess. It is reasonable to assume that construction activities for a development project under the proposed Project could generate emissions that would exceed the significance thresholds despite Mitigation Measure AQ-1. Therefore, the proposed Project is considered to result in a significant and unavoidable regional and localized construction impact related to violating an air quality standard and/or contributing substantially to an existing or projected air quality violation. Construction impacts would be significant and unavoidable.

  Mitigation Measure AQ-2 would require air quality analysis and appropriate air pollutant emissions reduction measures for projects that exceed the screening criteria identified above for large projects. While implementation of Mitigation Measure AQ-2 would reduce air pollutant emissions associated with development under the proposed Project, there would be no further feasible mitigation to reduce VOC, NO_x and CO to reduce these long-term emissions to a level below SCAQMD significance thresholds. Therefore, operational emissions impacts would be significant and unavoidable.
- **Impact AQ-3:** Future development projects under the proposed Project would potentially expose sensitive receptors to substantial pollutant concentrations. Impacts would be significant and unavoidable. Mitigation Measure AQ-1 would require air quality analysis and appropriate emissions reduction measures for projects that exceed the screening criteria, such as those with extensive grading, demolition, or other activities requiring soil disturbance, consistent with SCAQMD Rule 403. Specifically for health risk from TAC emissions during construction, the requirement for Tier 4 equipment would result in a substantial reduction of TAC emissions.

However, specific reduction in TAC emissions below the SCAQMD health risk significance thresholds cannot be demonstrated in the absence of specific project details to assess. It is reasonable to assume that construction activities for a development project under the proposed Project could generate TAC emissions that would exceed the significance thresholds despite Mitigation Measure AQ-1. Therefore, the proposed Project would potentially expose sensitive receptors to substantial pollutant concentrations during construction and impacts would be significant and unavoidable.

Additionally, the incremental effect of the proposed Project related to applicable air quality plans, national and State air quality standards, and toxic air contaminants would be cumulatively considerable and cumulative impacts would be significant and unavoidable.

5.3.2 Cultural Resources

- **Impact CUL-1:** Future development projects facilitated by the proposed Project could adversely affect known historical resources or those resources that have not been identified as eligible for listing in the NRHP or CRHR. The City's regulations and programs would help mitigate impacts to designated and eligible historical resources by requiring, in certain cases, adherence to the Standards and other requirements intended to preserve the character-defining features of individual historical resources and historic districts that qualify them as historical resources pursuant to CEQA. However, the City's regulations do not, in all cases, prevent demolition or substantial alteration of designated and eligible historical resources. Mitigation Measure CUL-1 would reduce impacts to historical resources to the greatest extent feasible by identifying and evaluating significant historical resources and managing relocation, rehabilitation, or alteration in compliance with the Standards as applicable. However, even with implementation of this mitigation measure, historical resources could still be materially impaired by future development projects carried out under the proposed Project. Therefore, potential impacts to historical resources under the proposed Project would be significant and unavoidable.

Additionally, the incremental effect of the proposed Project related to historical resources would be cumulatively considerable and cumulative impacts would be significant and unavoidable.

5.3.3 Land Use and Planning

- **Impact LU-1:** The proposed Project would be consistent with SCAG's 2024-2050 RTP/SCS goals and policies. The proposed Project would also be consistent with the BMC and Burbank2035 General Plan Land Use Map, with approval of the General Plan Land Use Amendment and zone text amendment included in the proposed Project. However, the proposed Project would conflict with policies under the Burbank2035 General Plan related to air quality and wastewater impacts. The proposed Project would implement Mitigation Measures AQ-1 and AQ-2 to reduce short-term and long-term criteria pollutants, but implementation would not reduce emissions below SCAQMD regional significance thresholds. The proposed Project would require implementation of Mitigation Measures UTIL-1a through UTIL-1e, and UTIL-3a through UTIL-3b to reduce potential impacts to wastewater system conveyance and treatment capacity, but would not reduce impacts to a less than significant level within the proposed Project horizon. Thus, impacts related to consistency with the Burbank2035 General Plan would be significant and unavoidable.

Additionally, the incremental effect of the proposed Project related to the conflicting policies would be cumulatively considerable and cumulative impacts would be significant and unavoidable.

5.3.4 Noise

- **Impact NOI-1:** Construction associated with future development projects accommodated under the proposed Project would be required to comply with the construction day and time restrictions specified in the Burbank Municipal Code. Depending on the scope of development facilitated by the proposed Project, construction may involve long durations, substantial soil movement, use of large, heavy-duty equipment, and/or pile driving near noise-sensitive land uses, which may produce noise levels that exceed the applicable FTA daytime noise limits. Implementation of Mitigation Measures NOI-1a through NOI-1i would reduce construction noise levels to below thresholds; however, because details of future project-specific construction activities are unknown at this time, temporary construction noise impacts would be significant and unavoidable.

Additionally, the incremental effect of the proposed Project related to construction noise would be cumulatively considerable and cumulative impacts would be significant and unavoidable.

5.3.5 Transportation

- **Impact TRA-1:** Implementation of the proposed Project would result in vehicles miles traveled (VMT) reductions for all three target metrics; however, it would not achieve the required reduction threshold for home-based work VMT per employee. No feasible program-level mitigation measures have been identified that would reduce impacts to a less-than-significant level. Therefore, the project would conflict with CEQA Guidelines 15064.3(B), and impacts would be significant and unavoidable.

Additionally, the incremental effect of the proposed Project related to VMT would be cumulatively considerable and cumulative impacts would be significant and unavoidable.

5.3.6 Utilities and Service Systems

- **Impact UTIL-1:** Future development projects under the proposed Project would require utility service and connections for water supply, wastewater conveyance, and stormwater conveyance, as well as telecommunications, electricity, and natural gas. Existing utility systems for water, electric power, natural gas, and telecommunications facilities in Burbank have sufficient capacity to serve future development projects under the proposed Project; however, new connections to existing and expanded wastewater service systems would be required, and such connections would result in exceedance of BWRP current capacity causing potentially significant environmental effects. Potential future improvements necessary to increase the treatment capacity of the BWRP have been preliminarily established. Implementation of Mitigation Measures UTIL-1a through UTIL-1e would be required to reduce potential impacts related to the City's wastewater conveyance and treatment system, but would not reduce potential impacts to a level of less than significant due to the exceedance of the available wastewater treatment capacity at BWRP associated with future development under the proposed Project. Implementation of capital improvements required to upgrade the City's wastewater conveyance and treatment system and expand capacity at BWRP are not expected to be fully funded or completed until beyond the proposed Project's 10-year planning horizon. Therefore, impacts related to wastewater systems would remain significant and unavoidable.
- **Impact UTIL-3:** Wastewater generated in the City of Burbank is conveyed to and treated at the Burbank Water Reclamation Plant. Future development projects under the proposed Project

would increase wastewater generation commensurate with the increased population, which would result in additional wastewater flows that would far exceed the existing capacity of the BWRP. Due to these flows, and the constraints within the City's treatment system, potentially significant impacts could result if the full buildout of the proposed Project is realized, and would require substantial facility improvements to accommodate this additional wastewater flow. Implementation of Mitigation Measures UTIL-3a and UTIL-3b would be required to reduce the potential impacts and ensure upgrades to the system. Nonetheless, necessary improvements to accommodate this additional wastewater flow are not expected to be completed within the 10-year planning horizon. Therefore, impacts would remain significant and unavoidable until the plans and upgrades are implemented.

Additionally, the incremental effect of the proposed Project related to water supply, wastewater facilities, and electricity would be cumulatively considerable and cumulative impacts would be significant and unavoidable.

5.4 Overriding Characteristics

After balancing the specific economic, legal, social, technological, and other benefits of the proposed Project, the City of Burbank has determined that the unavoidable, adverse environmental impacts identified above are considered "acceptable" due to the following specific considerations (i.e., objectives), which outweigh the unavoidable, adverse environmental impacts of the proposed Project.

The purpose of the proposed Project is to expand on previously established goals, guidelines, policies, programs, and direction to reflect current needs of the City and Specific Plan Area. The proposed Project aims to preserve the original intent of the 1991 Media District Specific Plan to encourage design that is compatible with the community's character, while addressing current issues facing the Specific Plan Area, such as housing supply and affordability, non-vehicular transportation infrastructure, and increased safety. The proposed Project addresses these current issues by encouraging residential and commercial development along major transit corridors and surrounding transit stations while respecting the 1991 Media District Specific Plan's goals of ensuring that growth in the Specific Plan Area is considered in context with the surrounding low and medium density residential neighborhoods.

The proposed Project also represents the implementation of the Burbank2035 General Plan goals and policies for the Specific Plan Area and helps accomplish Program LU-3: Specific Plans of the Plan Realization Element. Additionally, the proposed Project represents implementation of the community vision for future development of the Specific Plan Area. In conjunction with the City's General Plan and Zoning Code, the proposed Project provides a framework for existing and proposed development consistent with the vision and policies outlined in this document.

The proposed Project would introduce new residents, housing opportunities, and employment opportunities with the intent of providing a positive contribution to the maintenance and expansion of the City's economic base as development typically increases the City's collected building permit fees, business license taxes, utility user taxes, property taxes, and sales taxes. Therefore, future residents and workers associated with the proposed Project would generate additional tax revenue for the City from living and shopping in Burbank. An increased economic base would provide the City with resources to provide more high-quality services to its residents, including but not limited to long-term infrastructure upgrades to accommodate growth.

6 Alternatives

As required by Section 15126.6 of the *CEQA Guidelines*, this section of the EIR examines a range of reasonable alternatives to the proposed Project that would feasibly attain most of the basic Project objectives but would avoid or substantially lessen the significant adverse impacts.

Project Objectives

As discussed in Section 2, *Project Description*, of this EIR, the following objectives detail how the proposed Project would help achieve the vision for the Burbank Media District:

Emphasize Contextual Development

- Develop people-focused streetscapes and buildings that are sensitive to the surrounding intensity and scale of surrounding development.
- Allow sufficient and balanced development opportunities for media, medical, and other commercial establishments within the Media District.
- Encourage higher development intensity in the center of the Media District and transition as it approaches existing low- and medium-scale residential areas.

Transit Oriented Growth

- Align and encourage residential and commercial growth near major transportation resources, including new transit stops, corridors, and with major mobility centers.
- Ensure that non-vehicular infrastructure and public service improvements are designed to accommodate the needs of all existing and future development.
- Encourage more pedestrian and bicycle use through added infrastructure.

Facilitate Streamlined Housing Production

- Establish practical and objective design standards based on community feedback and best practices to ensure neighborhood compatibility and development.
- Encourage affordable and workforce housing development in the center of the Media District.
- Establish policies that will facilitate the streamlined development of a variety of housing in the center of the Media District.

Alternatives Considered for Evaluation

As stated above, the intent of the alternatives is to avoid or substantially lessen any of the significant effects of a project while still feasibly obtaining most of the basic project objectives. Alternatives have been developed to provide a reasonable range of options to consider that would help decision makers and the public understand the general implications of revising or eliminating certain components of the proposed Project. Based on the analyses provided in Section 4, *Environmental Impact Analysis*, of this Draft EIR, implementation of the proposed Project would result in significant and unavoidable impacts related to the following issue areas: air quality, cultural resources (historical resources only), land use and planning (policy consistency only), noise (construction noise only), transportation, and utilities and service systems (wastewater facilities and wastewater capacity). The proposed Project would also require implementation of mitigation for the following areas to avoid or reduce potentially

significant impacts: biological resources (special-status species only), cultural resources (archaeological resources only), geology and soils (paleontological resources only), hazards and hazardous materials (hazardous materials sites only), tribal cultural resources, utilities and service systems (wastewater facilities and wastewater capacity only), and wildfire (construction wildfire risk only). Additionally, the analysis in Sections 4.1 through 4.18 determined that the proposed Project would not result in a potentially significant impact related to the following issue areas: aesthetics, energy, geology and soils, greenhouse gas (GHG) emissions, hydrology and water quality, , population and housing, public services, recreation, and utilities and service systems (all except wastewater).

Based on the significant environmental impacts identified for the Project, the basic objectives established for the Project, and the feasibility of the alternatives considered, the following alternatives are evaluated in this section:

- Alternative 1: No Project Alternative
- Alternative 2: Increased Growth Alternative

The description of each alternative and the potential environmental impacts of each alternative are analyzed in Sections 6.1 through 6.2. In addition, a discussion of the alternatives that were considered but rejected is provided in Section 6.3.

6.1 Alternative 1: No Project Alternative

6.1.1 Description

The No Project Alternative involves continued implementation of the 1991 Media District Specific Plan, the 2021-2029 Burbank Housing Element, and the Burbank2035 General Plan. The No Project Alternative would not expand the Specific Plan Area boundary to include the Warner Bros. Ranch block located north of Oak Street, the Lakeside Shopping Center parcel, and Johnny Carson Park, as included in the proposed Project. The No Project Alternative assumes the housing, commercial, and general business development under the proposed Project would not occur, and other land use and mobility strategies associated with the proposed Project would not be implemented. The No Project Alternative assumes that the Burbank2035 General Plan and applicable policies would continue to accommodate development in accordance with existing land use designations and zoning regulations. The No Project Alternative would not involve modifications of allowed densities or floor area ratio (FAR), as identified for the proposed Project. Thus, the existing density and FAR within the Specific Plan Area would remain under this alternative. Because the opportunity sites under the proposed Project were identified as having the most realistic redevelopment potential, these opportunity sites are also anticipated to be utilized for development under the No Project Alternative but at lower densities than the proposed Project. Table 6-1 shows the development potential that would be provided under the No Project Alternative compared to the proposed Project.

Table 6-1 Development Potential for the No Project Alternative Compared to the Proposed Project

Type of Site	Residential (units)	Non-Residential (square footage)	Hospitality (rooms)
No Project Alternative	6,062	2,488,411	0
Proposed Project	9,702	3,986,207	400
Development Potential Compared to Proposed Project	-3,640	-1,497,796	-400

As shown in Table 6-1, the No Project Alternative would allow for a total development potential of 6,062 residential units, 2,488,411 square feet of non-residential uses, and no hotel rooms within the 1991 Media District Specific Plan Area. Compared to the proposed Project, the No Project Alternative would result in 3,640 fewer residential units, 1,497,796 fewer square feet of non-residential uses, and 400 fewer hotel rooms, as compared to a total proposed Project development potential of 9,702 residential units, 3,986,207 square feet of non-residential uses, and 400 hotel rooms within the proposed Specific Plan Area.

The impact analysis for the No Project Alternative below focuses on the thresholds studied in Sections 4.1 through 4.18 of this EIR. Impacts analyzed in Section 4.19, *Effects Found Not to be Significant*, were not analyzed below because the No Project Alternative would have the same level or lesser impacts than the proposed Project as related to those impacts addressed in that section due to less development under the No Project Alternative.

6.1.2 Impact Analysis

a. Aesthetics

As shown in Table 6-1, the No Project Alternative would result in less development generally within the same Specific Plan Area and would introduce fewer light sources and reduced light and glare impacts. Development under the No Project Alternative would be required to comply with the development standards related to light and glare described in Chapter 3 of the 1991 Media District Specific Plan, including requirements for building lighting design and limitations of the use of reflective materials. Further, development under the No Project Alternative would be required to comply with Burbank Municipal Code (BMC) regulations related to light and glare, including Section 10-1-628(W)(2), Chapter Section 10-1-628(W)(3), and Section 10-1-1153(A), as identified for the proposed Project. Therefore, impacts related to aesthetics would be less than significant and **less than** the proposed Project. (*Less impact*)

b. Air Quality

Under the No Project Alternative, fewer total residential units would be developed generally within the same Specific Plan Area, which would result in a smaller anticipated population increase. Operation of future development projects under the No Project Alternative would generate criteria air pollutant emissions associated with area sources (e.g., fireplaces, architectural coatings, consumer products, and landscaping equipment), energy sources (e.g., use of natural gas for space and water heating and cooking), and mobile sources (e.g., vehicle trips to and from the project site) at a lesser level than the proposed Project. Emissions associated with future development projects under the No Project Alternative, depending on project type and size, could exceed project-specific thresholds established by South Coast Air Quality Management District (SCAQMD). However, such projects would be required to undergo independent, project-level CEQA review and include mitigation measures, if necessary, to address potentially significant impacts. Therefore, as the No Project Alternative has the potential to cause or contribute to new violations, the No Project Alternative would be inconsistent with Criterion 1, and impacts would be potentially significant and similar to the proposed Project. No mitigation measures are available to reduce impacts related to Criterion 1 to a less-than-significant level. The No Project Alternative would result in significant and unavoidable impacts related to Criterion 1 but **less than** the proposed Project. (*Less impact*)

Similar to the proposed Project, the No Project Alternative would be consistent with Air Quality Management Plan (AQMP) control measures to reduce air pollution, but as further detailed below

under Section 6.1.2(l), the full buildout of the No Project Alternative would exceed the Southern California Association of Governments' (SCAG) 2035 housing forecast by 4,459 units, which is based on Census forecasts and not City policies or Specific Plans. Thus, the No Project Alternative would be inconsistent with the AQMP but to a lesser extent due to the reduced development. Impacts would result in significant and unavoidable impacts related to Criterion 2 but **less than** the proposed Project. (*Less impact*)

Construction and operational air quality impacts under the No Project Alternative would be less than those of the proposed Project, as less development would occur. The construction of 6,062 units would likely still cause potentially significant construction and operation air quality impacts. Future discretionary projects in the Specific Plan Area, when proposed, would be required to undergo CEQA analysis to the extent they are not otherwise exempt, including an analysis of air quality impacts. Similar to the proposed Project, mitigation may be required to reduce air quality impacts during construction and operation. However, specific reduction in emissions below the SCAQMD significance thresholds cannot be demonstrated in the absence of specific project details to assess. It is reasonable to assume that construction activities for a development project under the No Project Alternative could generate emissions that would exceed the significance thresholds despite implementation of mitigation measures, similar to the proposed Project. Thus, impacts would be significant and unavoidable but **similar to** the proposed Project. (*Similar impact*)

c. Biological Resources

Although the No Project Alternative would generally occur in the same urbanized Specific Plan Area and would involve reduced development in comparison to the proposed Project, development under the No Project Alternative could still potentially impact special-status species, nesting birds, and their habitat. Similar to the proposed Project, development under the No Project Alternative would be subject to the provisions of federal and State regulations protecting biological resources and would be required to comply with the goals, policies, and requirements of the Burbank2035 General Plan to reduce potential impacts to special-status species and their habitat. Nonetheless, construction of future development under the No Project Alternative could potentially occur during the bird nesting season, which is generally from March 1 through August 31 and begins as early as February 1 for raptors. Future discretionary projects in the Specific Plan Area, when proposed, would be required to undergo CEQA analysis to the extent they are not otherwise exempt, including an analysis of impacts to biological resources. Similar to the proposed Project, mitigation may be required for individual development projects under the No Project Alternative to reduce impacts to nesting birds, special-status species, and their habitats during construction. As such, potential impacts would be mitigated to a less-than-significant level, and impacts would be **similar to** the proposed Project. (*Similar impact*)

Additionally, similar to the proposed Project, the No Project Alternative would include the removal of public trees. In the event that individual future development projects under the No Project Alternative would include removal of public trees, the project applicant would be required to obtain permits for compliance with the requirements of Title 7 (Public Ways and Property), Chapter 4 (Trees and Vegetation) of the BMC. Compliance with the BMC would ensure that there would be no impact related to tree preservation ordinances, **similar to** the proposed Project. (*Similar impact*)

d. Cultural Resources

While the No Project Alternative would result in less development than the proposed Project generally within the same Specific Plan Area, the development that would occur could potentially cause a substantial adverse change in the significance of a historical resource through the demolition,

construction, and reconstruction activities. Since the No Project Alternative would not expand the Specific Plan Area, there would be slightly less ground disturbance under the No Project Alternative, reducing the potential for a substantial adverse change to a historical resource. Development under the No Project Alternative would comply with the City's Historic Preservation Regulations and the Burbank2035 General Plan Program LU-4: Historic Preservation Plan. Development under the No Project Alternative would also be required to comply with the neighborhood protection programs for development within the area between Olive Avenue/Alameda Avenue and Oak Street as described in the 1991 Media District Specific Plan. The City's regulations and programs would help mitigate impacts to designated and eligible historical resources by requiring, in certain cases, adherence to the standards and other requirements intended to preserve the character-defining features of individual historical resources and historic districts that qualify them as historical resources pursuant to CEQA. However, the City's regulations do not in all cases prevent demolition or substantial alteration of designated and eligible historical resources. As such, future discretionary projects in the Specific Plan Area, when proposed, would be required to undergo CEQA analysis to the extent they are not otherwise exempt, including an analysis of impacts to historic resources. Similar to the proposed Project, mitigation may be required to reduce impacts during construction. Nonetheless, even with implementation of mitigation measures, historical resources could still be materially impaired by future development under the No Project Alternative, and the loss of historical fabric cannot be readily compensated for. Therefore, impacts to historical resources would be significant and unavoidable and **similar to** the proposed Project. (*Similar impact*)

While the No Project Alternative would result in less development than the proposed Project generally within the same Specific Plan Area, the development that would occur could damage or destroy previously unknown archaeological resources that may be present on or below the ground surface. Since the No Project Alternative would not expand the Specific Plan Area, there would be slightly less ground disturbance under the No Project Alternative, reducing the potential for damage to a previously unknown archaeological resource. Development under the No Project Alternative would comply with the City's Historic Preservation Regulations and the Burbank2035 General Plan Program LU-4: Historic Preservation Plan. However, the City's regulations do not in all cases prevent damage to previously unknown archaeological resources. Future discretionary projects in Specific Plan Area, when proposed, would be required to undergo CEQA analysis to the extent they are not otherwise exempt, including an analysis of impacts to cultural resources. Similar to the proposed Project, mitigation may be required to reduce impacts during construction. As such, adherence to the City's regulations and implementation of mitigation would reduce potential impacts related to archaeological resources to a less-than-significant level and **similar to** the proposed Project. (*Similar impact*)

While the No Project Alternative would result in less development than the proposed Project generally within the same Specific Plan Area, the development that would occur could disturb unidentified human burials outside of formal cemeteries during construction activities. Since the No Project Alternative would not expand the Specific Plan Area, there would be slightly less ground disturbance under the No Project Alternative, reducing the potential for disturbance of human burials. Development under the No Project Alternative would also be required to comply with the California Health and Safety Code (Sections 7050.5, 7051, and 7054), Public Resources Code (PRC) Section 5097.98, City's Historic Preservation Regulations, and the Burbank2035 General Plan Program LU-4: Historic Preservation Plan. Adherence to existing State and local regulations would reduce potential impacts related to unidentified human burials to a less-than-significant level and **similar to** the proposed Project. (*Similar impact*)

e. Energy

As shown in Table 6-1, the No Project Alternative would result in less development generally within the same Specific Plan Area which would result in the introduction of less construction and operational energy demand. Development under the No Project Alternative would be required to comply with the development standards related to energy conservation described in Chapter 3 of the 1991 Media District Specific Plan. The No Project Alternative would also comply with existing State and local goals, policies, and regulations, which would ensure that development would not result in wasteful, inefficient, or unnecessary consumption of energy. Therefore, impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Similar to the proposed Project, development under the No Project Alternative would be required to comply with the most recent Title 24 standards, including the California Green Building Standards (CALGreen) Code, SCAG's 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), the Burbank2035 General Plan, and the 2022 Greenhouse Gas Reduction Plan (GGRP) Update. Thus, the No Project Alternative would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

f. Geology and Soils

The No Project Alternative would generally occur within the same Specific Plan Area, which is within the highly seismic Southern California region, where several fault systems are active or potentially active. Similar to the proposed Project, future development projects under the No Project Alternative may be subject to ground shaking in the event of an earthquake originating along one of the faults designated as active or potentially active in the Southern California region. Ground shaking is common throughout California, and, as such, future development projects under the No Project Alternative would pose no greater risk to public safety or destruction of property than is already present throughout the region. Compliance with applicable State and local regulations would ensure impacts related to ground shaking would remain less than significant; however, the No Project Alternative would introduce less development to the Specific Plan Area, reducing the number of people exposed to ground shaking. Thus, impacts would be less than significant **but less than** the proposed Project. (*Less impact*)

The No Project Alternative would generally occur within the same Specific Plan Area, which is within a liquefaction hazard zone. Similar to the proposed Project, future development projects under the No Project Alternative would not exacerbate liquefaction potential in the area than is already present throughout the region. Compliance with applicable State and local regulations would ensure impacts related to liquefaction would remain less than significant; however, the No Project Alternative would introduce less development to the Specific Plan Area, reducing the number of people exposed to liquefaction. Thus, impacts would be less than significant **but less than** the proposed Project. (*Less impact*)

Similar to the proposed Project, ground-disturbing activities associated with construction of development projects under the No Project Alternative would have the potential to result in the removal and erosion of topsoil during grading and excavation. Since the No Project Alternative would not expand the Specific Plan Area, there would be slightly less ground disturbance under the No Project Alternative, reducing the potential for soil erosion. Standard construction best management practices (BMPs) would be implemented to avoid or minimize soil erosion associated with ground-disturbing activities. Compliance with applicable State and local regulations would ensure impacts

related to soil erosion would remain less than significant **but less than** the proposed Project. (*Less impact*)

As discussed above, the No Project Alternative would generally occur within the same Specific Plan Area, which is within a liquefaction hazard zone and would be susceptible to lateral spreading. However, the Specific Plan Area is not within a landslide hazard zone or area subject to land subsidence and, as such, would not be susceptible to landslides or subsidence. Compliance with applicable State and local regulations would ensure impacts related to unstable soils, including lateral spreading, liquefaction, or collapse would remain less than significant; however, the No Project Alternative would introduce less development to the Specific Plan Area, reducing the number of people exposed to unstable soils. Thus, impacts would be less than significant **but less than** the proposed Project. (*Less impact*)

While the No Project Alternative would result in less development than the proposed Project generally within the same Specific Plan Area, the development that would occur could still impact previously unidentified paleontological resources during ground disturbing activity. Since the No Project Alternative would not expand the Specific Plan Area, there would be slightly less ground disturbance under the No Project Alternative, reducing the potential for impacts to a previously unidentified paleontological resource. Future discretionary projects in Specific Plan Area, when proposed, would be required to undergo CEQA analysis to the extent they are not otherwise exempt, including an analysis of impacts to paleontological resources. Similar to the proposed Project, project-specific mitigation may be required to reduce impacts during construction related to paleontological resources. As such, potential impacts would be mitigated to a less than significant level, and impacts would be **less than** the proposed Project. (*Less impact*)

g. Greenhouse Gas Emissions

Under the No Project Alternative, fewer residential units would be developed generally within the same Specific Plan Area, which would result in a smaller anticipated population increase compared to the proposed Project. Similar to the proposed Project, the No Project Alternative would be consistent with all applicable plans and policies, including the 2022 Scoping Plan, SCAG's 2024-2050 RTP/SCS, and the Burbank2035 GGRP. This alternative would result in lower GHG emissions than the proposed Project due to the reduced amount of development. Therefore, impacts would be less than significant and **less than** the proposed Project. (*Less impact*)

h. Hazards and Hazardous Materials

Although the No Project Alternative would result in less development than the proposed Project generally within the same Specific Plan Area, the No Project Alternative could still result in an incremental increase in the use of hazardous materials and/or the generation of hazardous materials and could involve demolition of existing structures with lead and asbestos. Similar to the proposed Project, the No Project Alternative would comply with California Code of Regulations (CCR) Title 8, Section 1532.1 and Section 1529, which require testing, monitoring, containment, and disposal of lead-based materials and asbestos-based materials such that exposure levels do not exceed California Occupational Safety and Health Administration (Cal/OSHA) standards. Development under the No Project Alternative would also comply with the regulations and standards of the Federal Clean Air Act, SCAQMD Rule 1403, the Burbank2035 General Plan Land Use Element Policy 1.5, and the Burbank2035 General Plan Safety Element Policies 8.1 through 8.8. Compliance with existing federal, State, and local regulations, standards, and policies related to hazardous materials would reduce potential impacts related to the use of hazardous materials and/or the generation of hazardous

materials to a less-than-significant level; however, the No Project Alternative would introduce less development to the Specific Plan Area, reducing the number of people exposed to these hazardous materials. Thus, impacts would be less than significant **but less than** the proposed Project. (*Less impact*)

The No Project Alternative would occur generally within the same Specific Plan Area, which includes three schools within the Specific Plan Area and within 0.25 mile of three schools. The Specific Plan Area contains hazardous materials sites that are within 0.25 mile of existing schools; however, each of those sites is closed and not expected to emit hazardous materials. Development under the No Project Alternative would result in less development than the proposed Project. Because the areas of development under the No Project Alternative have not been identified, the No Project Alternative would result in a similar amount of opportunities for development to emit hazardous emissions within 0.25 mile of a school. Development under the No Project Alternative would be required to comply with applicable regulations of the California Health and Safety Code, the California Environmental Protection Agency (CalEPA), Cal/OSHA, the Department of Toxic Substances Control (DTSC), the City Fire Code, and the BMC. Compliance with applicable State and local regulations would ensure impacts would be less than significant, **similar to** the proposed Project. (*Similar impact*)

The No Project Alternative would occur generally within the same Specific Plan Area which includes hazardous materials sites, including an active cleanup site and closed cleanup sites, compiled pursuant to Government Code Section 65962.5. A full list of these hazardous materials sites and their clean up status can be reviewed in Appendix F. Although the No Project Alternative would result in less development than the proposed Project, the reduction in development would be due to reduced intensity, not fewer potential project sites. Thus, there would be a similar amount of opportunities for development to be located on a hazardous materials site under the No Project Alternative compared to the proposed Project. Although there would be fewer development activities under the No Project Alternative, development could still potentially impact underground storage tanks (USTs). Future discretionary projects in Specific Plan Area, when proposed, would be required to undergo CEQA analysis to the extent they are not otherwise exempt, including an analysis of impacts associated with hazardous materials sites. Similar to the proposed Project, mitigation may be required to reduce impacts related to hazardous materials. As such, potential impacts would be mitigated to a less-than-significant level; however, the No Project Alternative would introduce less development to the Specific Plan Area, reducing the number of people exposed to these hazardous materials sites. Thus, impacts would be less than significant **but less than** the proposed Project. (*Less impact*)

Although the No Project Alternative would result in less development generally within the same Specific Plan Area, with additional population growth that could result from implementation of the No Project Alternative, plus regional growth, traffic conditions in and around the Specific Plan Area could become more congested during emergency response or evacuation. However, no proposed physical changes, such as roadway construction, would occur under the No Project Alternative that would interfere or impair emergency response or evacuation. Similar to the proposed Project, future development under the No Project Alternative would be reviewed to ensure consistency with applicable City and State design standards and emergency access requirements to ensure development would not interfere with evacuation routes or evacuation plans. Thus, impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

The No Project Alternative would occur within the generally same urbanized Specific Plan Area, which includes a moderate fire hazard severity zone (FHSZ), high FHSZ, and very high FHSZ (VHFHSZ) in the southern portion of the Specific Plan Area. Similar to the proposed Project, compliance with the Burbank2035 General Plan Safety Element Policies 4.3, 4.4, 4.6, and 4.7 and the building standards of

the City of Burbank and the most recent CBC would reduce potential impacts related to wildland fires under the No Project Alternative. Thus, impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

i. Hydrology and Water Quality

Although the No Project Alternative would result in less development generally within the same Specific Plan Area than the proposed Project, development under the No Project Alternative would incrementally increase demand for water during construction and operation, some of which would derive from groundwater sources, since groundwater is a part of the supply mix for Burbank Water and Power (BWP). The No Project Alternative would implement typical construction BMPs to prevent contamination of stormwater during construction and would comply with requirements of the National Pollutant Discharge Elimination System (NPDES) Construction General Permit Order Number R4-2012-0175 and the CBC to ensure that construction activities would not substantially deplete groundwater supplies. Thus, impacts would be less than significant and **similar to** the proposed project. (*Similar impact*)

The No Project Alternative would generally occur within the same Specific Plan Area; where there is no groundwater sustainability agency with jurisdiction over the San Fernando Basin, and, thus, no groundwater sustainability plan is in place. Similar to the proposed Project, the No Project Alternative would be consistent with all applicable regulations, standards, and policies, including the NPDES Construction General Permit, which would prevent violations of water quality standards and the waste discharge requirements of the MS4 Permit and BMC that are set to maintain compliance with the goals of the Water Quality Control Plan for the Los Angeles Region. Thus, with compliance with all applicable regulations, standards, and policies, impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

j. Land Use and Planning

The No Project Alternative involves the continued implementation of the 1991 Media District Specific Plan, the 2021-2029 Burbank Housing Element, and the Burbank2035 General Plan potential buildout. The No Project Alternative assumes that the proposed 9,702 housing sites and 3,986,207 square feet commercial and general business development under the proposed Project would not be constructed, and other land use and mobility strategies associated with the proposed Project would not be implemented. Under the No Project Alternative, the 1991 Media District Specific Plan and the Burbank2035 General Plan and applicable policies would continue to accommodate development in accordance with existing land use designations and zoning regulations. Development under the No Project Alternative would be required to comply with the goals and development standards described throughout the 1991 Media District Specific Plan. The No Project Alternative, similar to the proposed Project, would be inconsistent with the Burbank2035 General Plan policies regarding air quality and wastewater. The No Project Alternative would implement Mitigation Measures AQ-1 and AQ-2 to reduce short-term and long-term criteria pollutants, but implementation would not reduce emissions below SCAQMD regional significance thresholds. Additionally, the No Project Alternative would implement Mitigation Measures UTIL-1a through UTIL-1e, UTIL-3a, and UTIL-3b to mitigate potential impacts related to wastewater conveyance and capacity constraints, but complete implementation of necessary mitigation measures is not likely to occur within the No Project Alternative planning horizon. Thus, impacts related to a conflict with land use plans, policies, or regulations would remain significant and unavoidable and **similar to** the proposed Project. (*Similar impact*)

k. Noise

The No Project Alternative would result in less development generally within the same Specific Plan Area; however development under the No Project Alternative would still generate construction and operational noise. While construction under this alternative would also comply with the allowed daytime construction hours regulated by Section 9-1-1-105.10 of the BMC, larger developments could still generate construction noise in excess of applicable noise limits. Development under the No Project Alternative would be required to provide notice to nearby studios where activities would occur which may create noise exceeding 90 decibels within 100 feet of certain studio property (e.g., Walt Disney Company, Warner Bros. Discovery, and Burbank Studios) in compliance with the noise notification development standard described in Chapter 3 of the 1991 Media District Specific Plan. Development under this alternative would be required to comply with the goals and policies from the Burbank2035 General Plan and standards in the BMC, which would reduce potential noise impacts during construction activities. However, as exact details of future project-specific construction activities are unknown at this time, construction noise could still exceed the daytime significance threshold or potentially need to occur during the more sensitive nighttime hours. Future discretionary projects in the Specific Plan Area, when proposed under the No Project Alternative, would also be required to undergo CEQA analysis to the extent they are not otherwise exempt, including an analysis of noise impacts. Similar to the proposed Project, project-specific mitigation for any development project under this alternative may be required to reduce noise impacts during construction. Nonetheless, it cannot be guaranteed that construction noise impacts would be reduced to below the daytime significance threshold of 80 dBA L_{eq} (8-hour) at residential uses and other sensitive receptors in all cases. Therefore, construction noise impacts associated with development under the No Project Alternative would remain significant and unavoidable **similar to** the proposed Project. (*Slightly less impact*)

Although operational noise associated with the No Project Alternative would still be regulated by standards in the BMC, such noise sources would occur to a lesser degree than the proposed Project. Section 4.11, *Noise*, of this EIR, determined that increases in ambient noise levels associated with implementation of the proposed Project would not exceed applicable standards, and impacts would be less than significant. Because the No Project Alternative would involve less development, operational noise impacts would also be less than significant. As detailed above, development under the No Project Alternative would be required to provide notice to nearby studios (Walt Disney Company, Warner Bros. Discovery, and Burbank Studios) where activities would occur which may create excessive noise, in compliance with the noise notification development standard described in Chapter 3 of the 1991 Media District Specific Plan. Operational noise impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Development under the No Project Alternative could also generate vibration exceeding thresholds for building damage, particularly during construction. Although development would occur to a lesser degree than the proposed Project, future discretionary projects in the Specific Plan Area, when proposed, would be required to undergo CEQA analysis to the extent they are not otherwise exempt, including an analysis of vibrations impacts. Similar to the proposed Project, development under the No Project Alternative would be required to provide notice to certain nearby studios (Walt Disney Company, Warner Bros. Discovery, and Burbank Studios) where activities involving jackhammers or similar equipment, which may create vibration within 500 feet of studio property. In addition, similar to the proposed Project, project-specific mitigation for any development project under this alternative may be required to reduce vibration impacts during construction. As such, potential impacts would likely be less than significant with mitigation **similar to** the proposed Project.

Furthermore, as with the proposed Project, it is not anticipated that operation of development under the No Project Alternative would involve activities that would result in substantial vibration levels, such as use of heavy equipment. Accordingly, impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

I. Population and Housing

As shown in Table 6-1, the No Project Alternative would result in less development in the Specific Plan Area and, therefore, would result in a smaller population increase than the proposed Project. Using the California Department of Finance (DOF) persons per household ratio of 2.38, this alternative would result in an estimated population increase of 14,428 people (2.38 x 6,062 units). This would bring the population of Burbank from 105,603 to 120,031. At the City level, population forecasts are not provided by SCAG, so the following analysis focuses on the potential impacts associated with growth in housing and employment in the Specific Plan Area.

Housing

As detailed in Section 4.12, *Population and Housing*, of this EIR, the anticipated number of housing units under the Burbank 2021-2029 Housing Element is 10,011 units to accommodate the City's forecasted population growth under the Downtown Transit Oriented Development (TOD) Specific Plan and the Golden State Specific Plan (GSSP), which contain the Housing Element opportunity sites. However, the estimated growth under the analysis for the Housing Element EIR was changed to 10,456 units to account for the 2029 interpolated housing growth assumed under the two Specific Plans along with the City's Regional Housing Needs Assessment (RHNA) allocation. The addition of these units results in a total City-wide residential count of 55,525 units. As such, the 6,062 residential units under the No Project Alternative are not included in the City's current Housing Element. Under the Burbank2035 Land Use Element, the established City-wide cap on the number of housing units is 61,647 units. This total of 61,647 units, minus the 55,525 units accounted for in the 2021-2029 Housing Element, allows for 6,122 units of growth that is not accounted for in the Housing Element. Therefore, the addition of 6,062 units under the No Project Alternative would be within the General Plan's forecasted population growth. Table 6-2 shows the SCAG forecasts for population, housing, and employment in Burbank and Los Angeles County. Table 6-3 shows the estimated population and housing growth under the No Project Alternative in Burbank and Los Angeles County.

Table 6-2 SCAG Population, Housing, and Employment Forecasts

	2019		2035		2019-2035 Growth	
	City of Burbank	Los Angeles County	City of Burbank	Los Angeles County	City of Burbank	Los Angeles County
Population	107,800	10,046,000	N/A	10,449,000	N/A	4.0% (403,000)
Households	43,300	3,393,000	48,600	3,933,000	12.2% (5,300)	15.9% (540,000)
Employment	127,800	5,031,000	144,600	5,386,000	13.1% (16,800)	7.1% (355,000)

N/A – Not available

Source: SCAG 2024

Table 6-3 Population and Housing Growth Under the No Project Alternative

	City of Burbank	Los Angeles County
Population		
Existing	105,603	9,824,091
No Project Alternative	14,428	14,428
New Total	**120,031**	**9,838,519**
Percent Increase	13.7%	0.15%
Housing		
Existing	46,457	3,696,408
No Project Alternative	6,062	6,062
New Total	**52,519**	**3,702,470**
Percent Increase	13.0%	0.16%

Source: DOF 2024

As shown in Table 6-2, SCAG forecasts 48,600 housing units in Burbank in 2035 and as shown in Table 6-3, implementation of the No Project Alternative would result in 52,519 total housing units in Burbank. Therefore, the No Project Alternative would exceed SCAG's 2035 housing forecast by 3,919 units.

Although development under the No Project Alternative would exceed SCAG's estimated housing growth, the 1991 Media District Specific Plan was intended as a growth control plan and designed to dramatically reduce the amount of development that could occur within the Specific Plan Area. Implementation of the 1991 Media District Specific Plan would result in less development compared to the proposed Project, which would reduce the No Project Alternative's impact related to population growth. Therefore, future development under the No Project Alternative would not result in unplanned population and housing growth, and impacts would be less than significant and would be **less than** the proposed Project. (*Less impact*)

Employment

Development under the No Project Alternative would result in up to 2,488,411 square feet of non-residential uses and would result in approximately 4,870 new jobs, as shown in Table 6-4.

Table 6-4 Estimated Employment Associated with the No Project Alternative

Land Use	Build Out Square Footage	Square Feet per Employee[1]	Total New Employees
Retail	2,488,411	511	4,870

[1] Source: SCAG 2001 (Table 4B); the factor used for commercial space is the average of the factors for "Other Retail/Services" and "Low-Rise Office."

As shown in Table 6-2, SCAG forecasts approximately 144,600 jobs in Burbank in 2035 and as shown in Table 6-3, implementation of the No Project Alternative would result in 4,870 new jobs in Burbank, increasing the total jobs in Burbank from 127,800 to 132,670 jobs. Therefore, the No Project Alternative would be within the SCAG employment forecast, resulting in a less than significant impact and **similar to** the proposed Project. (*Similar impact*)

m. Public Services

The No Project Alternative would result in fewer residential units than the proposed Project generally within the same Specific Plan Area. Development under the No Project Alternative would comply with the same regulations as identified for the proposed Project for potential impacts related to fire and police services, parks and recreation, and library facilities, including Policies 2.2, 2.4, and 3.1 through 3.6, and Program OSC-2 of the Burbank2035 General Plan Open Space and Conservation Element; Program LU-8 of the Burbank2035 General Plan Land Use Element; Policies 2.1, 2.2, and 4.1 through 4.7 of the Burbank2035 Safety Element; and BMC Section 9-4-1-1103. Additionally, future development under the No Project Alternative would pay similar development impact fees as identified for the proposed Project to help fund additional facilities and equipment. These funds, in addition to the General Fund from property and sales tax revenues, would help pay for costs associated with the development of public services facilities, if needed, including any required environmental analysis.

For potential impacts related to public schools, California Education Code Section 17620 authorizes school districts to levy a fee against any development project for the construction or reconstruction of school facilities, provided that the district can show justification for levying of fees. Pursuant to Section 65995(h) of the California Government Code, the payment of such statutory fees is "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization."

In the event that a new public services facility is constructed or an existing facility is physically altered, a project-specific environmental analysis would be required under CEQA to address site-specific environmental concerns. Because the No Project Alternative would result in fewer residential units than the proposed Project, the increase in demand on public services, including police protection, fire protection, schools, parks, and libraries, would be less than that of the proposed Project. Impacts would remain less than significant and would be **less than** the proposed Project. (*Less impact*)

n. Recreation

The No Project Alternative would result in fewer residential units than the proposed Project generally within the same Specific Plan Area. Development under the No Project Alternative would comply with the same regulations as identified for the proposed Project, including Policies 2.2, 2.4, and 3.1 through 3.6, and Program OSC-2 of the Burbank2035 General Plan Open Space and Conservation Element; Program LU-8 of the Burbank2035 General Plan Land Use Element; and BMC Sections 9-4-1-1103 and 10-1-2227. Additionally, development under the No Project Alternative would pay similar development impact fees as identified for the proposed Project to help fund additional parks or recreational facilities. These funds, in addition to the General Fund from property and sales tax revenues, would help pay for costs associated with the development of parks or recreational facilities, if needed, including any required environmental analysis. In the event that a new park or recreational facility is constructed or an existing facility is physically altered, a project-specific environmental analysis would be required under CEQA to address site-specific environmental concerns. Because the No Project Alternative would result in fewer residential units than the proposed Project, the increase in demand on parks and recreation services would be less than that of the proposed project. Impacts would remain less than significant and would be **less than** the proposed Project. (*Less impact*)

o. Transportation

As shown in Table 6-1, the No Project Alternative would result in less development in the Specific Plan Area. Development under the No Project Alternative would be required to comply with the development standards related to transportation demand management and public transit and would pay the transportation mitigation fees described in Chapter 3 and Chapter 5 of the 1991 Media District Specific Plan, respectively.

To evaluate potential VMT impacts under *CEQA Guidelines* Section 15064.3(b), the No Project Alternative was assessed using three performance metrics: (1) home-based VMT per capita, (2) home-based work VMT per employee, and (3) total VMT per service population. Each metric is compared to a threshold requiring a 15-percent reduction below existing (2023) baseline VMT levels.

VMT modeling provides estimates for the population, employment, and service population in the Specific Plan Area in 2035, as summarized in Table 6-5.[1] Under the No Project Alternative, the Specific Plan Area population in 2035 is estimated to be 22,737, which is estimated to produce 27,968 daily vehicle trips and 241,167 daily VMT, with an average of 10.6 home-based VMT per capita. The 63,056 future employees under the VMT model in the Specific Plan Area are estimated to attract 77,187 daily vehicle trips and 835,683 daily VMT, with an average of 13.3 home-based work VMT per employee. The total 85,793 service population under the VMT model in the Specific Plan Area is estimated to generate 221,780 daily vehicle trips and 1,924,031 daily VMT, with an average of 22.4 total VMT per service population.

Table 6-5 No Project Alternative VMT Summary

Metric	2023 Baseline	No Project Alternative	Percent Difference
Total Daily VMT per Service Population	31.0	22.4	-27.5%
Home-Based Daily VMT per Capita	14.7	10.6	-27.9%
Home-Based Work Daily VMT per Employee	13.4	13.3	-1.0%

Source: Fehr & Peers, 2025

As summarized in Table 6-5, the No Project Alternative would reduce total VMT per service population by 27.5 percent and home-based VMT per capita by 27.9 percent, which both would exceed the required 15-percent reduction threshold. However, it would only reduce home-based work VMT per employee by 1.0 percent, which falls short of the 15-percent target. Compared to the proposed Project's total daily VMT per service population of 21.0, home-based daily VMT per capita of 10.4, and home-based work daily VMT per employee of 12.8, the total daily VMT per service population, home-based daily VMT per capita, and home-based work daily VMT per employee generated by the No Project Alternative would have a slightly lesser reduction in VMT, thus a slightly greater impact. Potential mitigation measures described in Section 4.15, *Transportation*, of this EIR, could be applied at the project-specific level to future development under the No Project Alternative. However, similar to the proposed Project, the mitigation measures are not feasible to apply at the program level and are beyond the scope of this document.

As such, the No Project Alternative would not fully meet CEQA's threshold of significance for VMT and no feasible mitigation measures have been identified to reduce the VMT impact to a less-than-

[1] As discussed in the Technical Review of Modeling and VMT Methodology for Media District Specific Plan Traffic Study Report prepared for the proposed Project (Appendix D), the VMT analysis used the City's travel demand model, which has a 2023 base year and 2035 horizon year. The incremental growth assumptions shown in the VMT analysis can differ from the growth assumptions shown elsewhere in this EIR due to the inclusion of other cumulative growth within the Specific Plan Area.

significant level. Therefore, the No Project Alternative would result in a significant and unavoidable impact and **slightly greater** than the proposed Project. (*Slightly greater impact*)

p. Tribal Cultural Resources

While the No Project Alternative would result in less development than the proposed Project generally within the same Specific Plan Area, the development that would occur could adversely affect unidentified subsurface archaeological resources that may qualify as tribal cultural resources during construction. Since the No Project Alternative would not expand the Specific Plan Area, there would be slightly less ground disturbance under the No Project Alternative, reducing the potential to adversely affect an unidentified subsurface archaeological resource that may qualify as a tribal cultural resource. Development under the No Project Alternative would comply with the City's Historic Preservation Regulations and the Burbank 2035 General Plan Program LU-4: Historic Preservation Plan. However, the City's regulations do not in all cases prevent impacts to tribal cultural resources. Future discretionary projects in Specific Plan Area, when proposed, would be required to undergo CEQA analysis to the extent they are not otherwise exempt, including an analysis of impacts to tribal cultural resources and the Native American consultation process. Similar to the proposed Project, mitigation would likely be required to reduce impacts during construction. As such, adherence to the City's regulations and mitigation would reduce potential impacts related to tribal cultural resources to a less-than-significant level and **similar to** the proposed Project. (*Similar impact*)

q. Utilities and Service Systems

Water Supply

Similar to the proposed Project, future development under the No Project Alternative would increase the demand for potable water during construction and operation. New water supply connections and associated facilities would be required for future developments under the No Project Alternative to convey potable water supply to future development projects. Such upgrades would occur within existing and new utility easements and would be located underground, primarily within existing roadways. Due to the built-up nature of the Specific Plan Area, there are substantial existing utility rights-of-way previously established, largely within existing roadways, which are prevalent. New water service connections that may be required for development associated with the No Project Alternative would be conducted within previously disturbed areas and existing rights-of-way and would be consistent with utility expansion in urbanized areas, such that minimal areas of new disturbance would occur. Developers are responsible for funding any infrastructure improvements that are required to mitigate project impacts and have not been previously identified as part of a capital improvement program covered by the development impact fees. Consistent with applicable State law, the City's development fees would ensure that the developers pay the cost attributable to the increased demand for the affected public facilities reasonably related to the development project in order to refurbish the existing facilities to maintain the existing level of service and achieve an adopted level of service that is consistent with the City's General Plan. The Water Supply Assessment (WSA) prepared for the proposed Project (Appendix J) determined that forecasted growth from the proposed Project was accounted for in the analysis of SCAG growth projects, and, thus, BWP would have sufficient supply to meet the anticipated demand of the No Project Alternative. Additionally, development under the No Project Alternative would result in a reduced operational water demand, because it involves fewer residential units compared to the proposed Project. Therefore, the No Project Alternative would not require the construction of new water facilities, and the No Project

Alternative would have sufficient supplies available to serve the alternative. Impacts would be less than significant and **less than** the proposed Project. (*Less impact*)

Wastewater

Similar to the proposed Project, future development under the No Project Alternative would require new connections for wastewater conveyance. All sewer connections are subject to a Sewer Service Charge (SSC). Development under the No Project Alternative would be required to comply with the requirements of BMC Title 8, Chapter 1, *Sewers*, which establishes City standards related to wastewater discharge, peak flow, and sewer capacity. New connections to the City sewer system, including the construction of new laterals connecting to the sewer mainline, would be subject to permitting approval by the City of Burbank Public Works Permit Section (City of Burbank 2026). Although all parcels in Burbank have access to public utility infrastructure, in some cases, the infrastructure is older and in need of replacement to meet the needs of a particular project. Pursuant to Burbank2035 General Plan Land Use Policy 2.3, new development is required to pay for their share of upgrading the utility infrastructure as needed to serve their project.

The Focused Sewer Capacity Analysis prepared for the proposed Project by the City of Burbank Public Works Department in September 2025, analyzed the No Project Alternative under the assumption that no development would occur in the Specific Plan Area, which does not provide an accurate analysis of the No Project Alternative. It can be assumed that, while the No Project Alternative includes less development than the proposed Project, the No Project Alternative would introduce development which would increase wastewater flows. The Burbank Water Reclamation Plan (BWRP) currently has limited remaining capacity with the ability to treat sewer inflows at an average rate of approximately 8.5 million gallons per day (MGD) (Appendix H). Thus, although the Focused Sewer Capacity Analysis does not conclude that the No Project Alternative would result in additional wastewater inflow to BWRP, it can be assumed that the No Project Alternative's actual additional wastewater inflows to BWRP would exceed the limited remaining capacity of BWRP. Similar to the proposed Project, mitigation would likely be required to reduce impacts relating to the City's wastewater conveyance and treatment capacity constraints, however as further described in Section 4.17, *Utilities and Service Systems*, complete implementation of necessary improvements to the wastewater infrastructure and treatment facilities to accommodate additional wastewater inflows would not be practicable within the 10-year horizon due to high costs and operational challenges. Therefore, impacts to wastewater would remain significant and unavoidable but would be **less than** the proposed Project due to reduced development under the No Project Alternative. (*Less impact*)

Stormwater

Similar to the proposed Project, future development under the No Project Alternative would not result in a substantial increase in impervious surfaces since it would be focused in urban infill areas already largely covered with impervious surfaces. Because the No Project Alternative would not expand the Specific Plan Area, the No Project Alternative would result in a slightly reduced increase in impervious surfaces and thus, a slightly reduced increase in stormwater runoff. Compliance with Sections 9-3-413 and 9-3-414 of the BMC would ensure that future development projects resulting from the No Project Alternative would be implemented with appropriately sized and sited stormwater conveyance facilities. Compliance with existing local regulations, BMPs, and standards would ensure impacts related to relocation or construction of new stormwater facilities would be less than significant; however, the No Project Alternative would introduce less impervious surfaces to the

Specific Plan Area, reducing the potential increase in stormwater runoff. Thus, impacts would be less than significant but **less than** the proposed Project. (*Less impact*)

Telecommunications

Similar to the proposed Project, future development under the No Project Alternative would increase the demand for telecommunications connections. New connections for telecommunications would be implemented on a project-by-project basis. New telecommunications service connections that may be required for development under the No Project Alternative would be conducted within previously disturbed areas and existing utility easements and would be consistent with utility expansion in urbanized areas. Compliance with existing State regulations would ensure that impacts related to telecommunications facilities would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Electricity

Similar to the proposed Project, electricity service for future development under the No Project Alternative would be provided by BWP through new future connections that would be implemented on a project-specific basis, and subject to the review and approval of BWP. New electricity service connections that may be required for future development associated with the No Project Alternative would be conducted within previously disturbed areas and existing rights-of-way and would be consistent with utility expansion in urbanized areas. Project proponents would be responsible for contributing their fair share of electrical facilities upgrades, as further described below.

BWP determined that buildout of the No Project Alternative would demand an additional 18 megawatts (MW) for residential development and 15 MW for commercial development, totaling 33 MW of additional electrical demand as compared to the 54 MW of total additional electricity demand generated by the proposed Project. BWP has a limitation of 450 MW at the existing system interconnection with Los Angeles Department of Water and Power (LADWP). BWP may also elect to operate the 40-MW Lake Generating Unit[2] to serve system capacity needs, bringing the potential available system capacity to 490 MW (Appendix K). Considering BWP's all-time peak of 322 MW and the additional forecasted load growth associated with Citywide planned development of 99 MW, BWP is forecasting a new system peak of 421 MW. This would result in approximately 69 MW of remaining capacity to serve developments under the No Project Alternative and any anticipated ambient growth[3] prior to 2035, before additional interconnection capacity would be necessary. Therefore, the No Project Alternative's additional electrical demand of 33 MW would account for 48 percent of BWP's remaining electrical capacity and could require substantial system interconnection capacity increase to accommodate this additional electricity demand.

Project proponents of individual development projects under the No Project Alternative would be responsible for contributing their fair share of electrical on-site improvements, related off-site improvements, and substation capacity based on the electrical demand for the specific development projects, as required by BWP, Title 8, Chapter 2 of the BMC, and Burbank2035 Land Use Element Policy 2.3. It is anticipated that installation of distribution substations and new sub-transmission and distribution facilities would be subject to CEQA review at the time a specific design is proposed. Given

[2] The Lake Generating Unit is typically relied upon during summer peak days or when the Magnolia Power Plant is down for maintenance. Given that this generating unit is a tertiary backup to the Magnolia Power Plant and the LADWP interconnection, this generating capacity can be relied upon to provide base capacity in BWP's electric system. It should be noted that emissions limitations coupled with cost limitations may impact the use of this generating unit.

[3] It is anticipated that ambient growth from housing activity, which includes new single-family homes, and mixed-use developments outside of the specific plans could be between 50 to 100 units per year or between 500 to 1,000 dwelling units.

the City's highly developed nature and the likelihood that these electricity facilities would be on an infill site, potential impacts under that infrastructure project would likely be less than significant or even exempt from CEQA review. Therefore, potential impacts associated with new or expanded electrical facilities would be less than significant **but less than** the proposed Project. (*Less impact*)

Natural Gas

Similar to the proposed Project, future development under the No Project Alternative would increase the demand for natural gas connections. New connections for natural gas would be implemented on a project-by-project basis. Similar to the proposed Project, all new development under the No Project Alternative would be designed for consistency with the California Public Utilities Commission (CPUC) mandates for implementing energy efficiency standards and practices. In addition, as further described in Section 4.17, *Utilities and Service Systems*, as development of additional renewable energy sources for SoCalGas continues to expand, it is reasonably inferred that demand for natural gas would decrease due to better energy efficiency and updated fuel substitution assumptions. Therefore, although there would be additional natural gas connections under the No Project Alternative, the per capita demand for natural gas in the City is expected to continue decreasing through compliance with California Public Utilities Commission (CPUC) mandates for energy efficiency standards and practices and through the greater diversification of energy supplies to include a suite of renewable energy sources in addition to natural gas. New natural gas service connections that may be required for development under the No Project Alternative would be conducted within previously disturbed areas and existing utility easements and would be consistent with utility expansion in urbanized areas. Compliance with existing State regulations would ensure that impacts related to natural gas facilities would be less than significant and **less than** the proposed Project. (*Less impact*)

Solid Waste

Similar to the proposed Project, development accommodated by the No Project Alternative would generate both construction and operational solid waste that would be disposed of at the Burbank Landfill Site No. 3, Sunshine Canyon Landfill, Sunshine Canyon Landfill, Simi Valley Landfill & Recycling Center, Antelope Valley Public Landfill, and other collection centers. As determined in Section 4.17, *Utilities and Service Systems*, of this EIR, solid waste generated by the proposed Project would be accommodated by these landfills. Thus, as the No Project Alternative involves reduced development compared to the proposed Project, it would result in reduced solid waste generated, and, as such, the solid waste generated by the No Project Alternative would also be accommodated by the landfills serving the Specific Plan Area. Similar to the proposed Project, development projects under the No Project Alternative would generate solid waste, including construction debris, which would be subject to CALGreen Code requirements and the California Integrated Waste Management Act of 1989 requirements for salvaging, recycling, and reuse of materials from construction activities. In accordance with CALGreen Code requirements, development projects under the No Project Alternative would be required to achieve a minimum of 65-percent diversion rate for construction waste and would be required to comply with federal, State, and local statues and regulations related to solid waste, such as the California Integrated Waste Management Act of 1989 and the City's recycling programs. Therefore, potential impacts associated with solid waste facilities would be less than significant **but less than** the proposed Project. (*Less impact*)

r. Wildfire

The No Project Alternative would result in fewer residential units than the proposed Project generally within the same Specific Plan Area. Under the No Project Alternative, the Burbank2035 General Plan and applicable policies would continue to accommodate development in accordance with existing land use designations and zoning regulations. Because the opportunity sites under the proposed Project were identified as having the most realistic redevelopment potential, these opportunity sites are also anticipated to be utilized for development under the No Project Alternative but at lower densities than the proposed Project. As detailed in Section 4.18, *Wildfire*, of this EIR, the Specific Plan Area is not found within a state responsibility area (SRA); however, the majority of the Specific Plan Area south of SR-134 is designated as a moderate FHSZ, high FHSZ, or VHFHSZ within a local responsibility area (LRA). Some opportunity sites are located within the moderate FHSZ, high FHSZ, or VHFHSZ portions of the Specific Plan Area, as shown in Figure 4.18-2 in Section 4.18, *Wildfire*. Therefore, it is reasonable to assume that potential development under the No Project Alternative would occur within the moderate FHSZ, high FHSZ, or VHFHSZ portions of the Specific Plan Area.

Similar to the proposed Project, it is not expected that buildout of the No Project Alternative would contribute to the critical fire environment because it would not increase the length of the Wildland Urban Interface (WUI). The No Project Alternative would not involve any changes or improvements to designated evacuation routes within the Specific Plan Area, SR-134, and West Olive Avenue. Similar to the proposed Project, development under the No Project Alternative would adhere to the fire safety design standards and emergency access requirements in the California Building Standards Code and the BMC. As part of standard development procedures, plans for future development projects under the No Project Alternative would be submitted for review and approval to ensure that all new development would comply with applicable fire safety and emergency access regulations and would not impair or physically interfere with adopted emergency response or evacuation procedures. Therefore, impacts related to adopted emergency response plans or emergency evacuation plans would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Construction of individual projects under the No Project Alternative would result in a temporary increase in human activity and potential ignition sources, including equipment that could create spark, be a source of heat, or leak flammable materials within the Specific Plan Area, similar to the proposed Project. The potential risk of wildfire ignition and spread associated with individual project construction would be potentially significant, similar to the proposed Project. Future discretionary projects in Specific Plan Area, when proposed, would be required to undergo CEQA analysis to the extent they are not otherwise exempt, including an analysis of wildfire impacts. Similar to the proposed Project, mitigation would likely be required to reduce impacts during construction. In addition, the California Building Code (CBC), California Fire Code (CFC), and California WUI Code include minimum fire hazard reduction requirements in the VHFHSZ for driveway widths, the creation and maintenance of wildfire buffers, sprinklers, and alarms. Compliance with these development standards would further reduce the potential for increased wildfire risk or the uncontrolled spread of wildfire in the Specific Plan Area. Therefore, impacts related to exacerbation of wildfire risks and exposure of occupants to pollutant concentrations from a wildfire would be less than significant with mitigation incorporated and **similar to** the proposed Project. (*Similar impact*)

The No Project Alternative would result in fewer residential units than the proposed Project generally within the same Specific Plan Area which is in an urbanized area of the City that includes existing roads, pipelines, and overhead electrical infrastructure that serves surrounding commercial and residential properties. As detailed in Section 4.18, *Wildfire*, the Specific Plan Area is not located within a high-fire threat district designated by the CPUC, but the dense vegetated areas south of the Specific

Plan Area are designated as a Tier 2 (elevated risk of potential impacts to people and property) high-fire threat district. BWP does not operate any facilities that could risk ignition (e.g., electrical transmission, subtransmission, distribution lines, substations, or other facilities) within the Tier 2 high-fire threat district located south of the Specific Plan Area. Thus, BWP facilities and equipment within the Specific Plan Area do not pose a direct wildfire hazard threat to the Tier 2 high-fire threat district located south of the Specific Plan Area. Similar to the proposed Project, development under the No Project Alternative would be served by existing roads and extensions of existing power lines, water sources, and other utilities. The No Project Alternative in itself would not propose the installation or maintenance of infrastructure that may exacerbate fire risk. The potential extension or improvement of infrastructure for future development projects under the No Project Alternative would be implemented in accordance with all local and State regulations pertaining to power lines and other related infrastructure and fire suppression requirements, which would include CBC, CFC, CPUC, and WUI Code requirements for fire protection and future development projects would be subject to review and approval by the BFD. Therefore, impacts related to installation or maintenance of associated infrastructure that may exacerbate fire risk would be less than significant and **similar to** the proposed Project. (*Similar impact*)

The No Project Alternative would result in fewer residential units than the proposed Project generally within the same Specific Plan Area which is generally characterized by flat terrain that is developed and consists primarily of commercial and residential uses. The southern boundary of the Specific Plan Area abuts Griffith Park and the Hollywood Hills, which include rugged hillsides, canyons, and residential development typical of Southern California's WUI zones with elevations ranging from approximately 538 feet above mean sea level to nearby peaks reaching 1,634 feet. The Specific Plan Area's southern portion is designated as a VHFHSZ within an LRA. The nearby steep slopes and heavy hillside vegetation contribute to wildfire risks due to the potential for downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Similar to the proposed Project, development under the No Project Alternative would conform to design requirements associated with proper site preparation and grading practices and would implement surface drainage improvements and erosion control measures as well as construction BMPs as specified in the Stormwater Pollution Prevention Plan (SWPPP) to stabilize graded slopes and prevent excessive runoff and erosion. With compliance with existing design requirements and construction BMPs, the No Project Alternative would not expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

6.1.3 Project Objectives Fulfillment

The No Project Alternative assumes that the proposed 9,702 housing sites and 3,986,207 square feet commercial and general business development under the proposed Project would not be constructed, and other land use and mobility strategies associated with the proposed Project would not be implemented. Under the No Project Alternative, the 1991 Media District Specific Plan, the 2021-2029 Burbank Housing Element, and the Burbank2035 General Plan and other applicable city policies would continue to accommodate development in accordance with existing land use designations and zoning regulations. As such, the No Project Alternative would not meet the underlying purpose of the project or meet several of the project objectives, as described below. The No Project Alternative would partially meet the following objectives:

- Develop people-focused streetscapes and buildings that are sensitive to the surrounding intensity and scale of surrounding development.
  - The No Project Alternative would include recommendation from the 1991 Media District Specific Plan regarding pedestrian scale, building massing, and pedestrian access to buildings. However, there is no formal enforcement of these recommendations.
- Allow sufficient and balanced development opportunities for media, medical, and other commercial establishments within the Media District.
  - The No Project Alternative would involve the development of 6,062 residential units and 2,488,411 square feet of non-residential uses within the Media District, providing balanced development opportunities within the Media District.
- Encourage more pedestrian and bicycle use through added infrastructure.
  - While some pedestrian and bicycle infrastructure already exists in the City, the No Project Alternative would not facilitate additional streetscape improvements beyond what is currently implemented. However, development under the No Project Alternative would be subject to the 1991 Media District Specific Plan design standards and regulations for pedestrian infrastructure and the goals and policies of the Burbank2035 General Plan related to pedestrian and bicycle infrastructure.
- Establish practical and objective design standards based on community feedback and best practices to ensure neighborhood compatibility and development.
  - The No Project Alternative would not alter existing objective design standards or establish new practical or objective design standards based on community feedback and best practices. However, development under the No Project Alternative would occur in accordance with the current standards under the 1991 Media District Specific Plan and Burbank2035 General Plan which were created to ensure neighborhood compatibility and development.
- Encourage higher development intensity in the center of the Media District and transition as it approaches existing low- and medium-scale residential areas.
  - Under the No Project Alternative, the Burbank2035 General Plan and applicable policies would continue to accommodate development in accordance with existing land use designations and zoning regulations. Because the opportunity sites under the proposed Project were identified as having the most realistic redevelopment potential, these opportunity sites are also anticipated to be utilized for development under the No Project Alternative but at lower densities than the proposed Project. Thus, the No Project Alternative would involve the development of 6,062 residential units and 2,488,411 square feet of non-residential uses in proximity to the major commercial corridors, but this development is not formally planned within specific areas of the Specific Plan Area, such as the center of the Specific Plan Area.
- Align and encourage residential and commercial growth near major transportation resources, including new transit stops, corridors, and with major mobility centers.
  - Under the No Project Alternative, policies included in the 1991 Media District Specific Plan and Burbank2035 General Plan would be applicable to development. The 1991 Media District Specific Plan does not include policies that would focus potential growth near transportation resources or promote additional public transportation resources. Policy 4.3 of the

Burbank2035 General Plan Mobility Element calls for creation of a new transit center in the Media District.

The No Project Alternative would not meet the following objectives:

- Ensure that non-vehicular infrastructure and public service improvements are designed to accommodate the needs of all existing and future development.
  - The No Project Alternative would not encourage infrastructure and public service improvements further than the existing 1991 Media District Specific Plan guidelines. Further, as described above under Section 6.1.2(q), the No Project Alternative would not maintain sufficient infrastructure for the existing or future development within the Media District, as the development under the No Project Alternative would result in a significant and unavoidable wastewater treatment capacity impact.
- Encourage affordable and workforce housing development in the center of the Media District.
  - Under the No Project Alternative, policies included in the 1991 Media District Specific Plan and Burbank2035 General Plan would be applicable to development. The 1991 Media District Specific Plan does not include policies that would facilitate and implement the creation of affordable and workforce housing development in the Media District, and Policy 5.5 of the Burbank2035 General Plan Land Use Element would encourage more people to live near work and public transit by allowing higher residential densities in employment centers such as the Media District.
- Establish policies that will facilitate the streamlined development of a variety of housing in the center of the Media District.
  - Under the No Project Alternative, policies included in the 1991 Media District Specific Plan and Burbank2035 General Plan would be applicable to development. The 1991 Media District Specific Plan does not include policies that would facilitate the streamlined development of a variety of housing in the center of in the Media District, and Policy 2.1 of the 2021-209 Housing Element would direct the majority of new residential development into Downtown Burbank, the Golden State/Airport Area, and the Media District.

6.2 Alternative 2: Increased Growth Alternative

6.2.1 Description

The Increased Growth Alternative is included to assess the potential impacts if the updated Specific Plan allows for maximum density under recent State housing laws. This alternative scenario would allow increased density to the same opportunity sites and potential development sites in the Specific Plan Area that are considered under the proposed Project. Thus, the Increased Growth Alternative would involve the same amount of potential ground disturbance as the proposed Project. Table 6-6 shows the net development potential that would be provided under the Increased Growth Alternative. This growth would be in addition to what is already allowed under the existing Specific Plan zoning and land use regulations.

Table 6-6 Development Potential for the Increased Growth Alternative Compared to the Proposed Project

Type of Site	Residential (units)	Non-Residential (square footage)	Hospitality (rooms)
Increased Growth Alternative Development	14,312	7,265,850	400
Proposed Project Development	9,702	3,986,207	400
Development Potential Compared to Proposed Project	4,610	3,279,643	0

Compared to the proposed Project, the Increased Growth Alternative would result in a net increase of 4,610 residential units and 3,279,643square feet of non-residential uses, for a total development potential of 14,312 residential units, 7,265,850 square feet of non-residential uses, and 400 hotel rooms. Ultimately, this alternative would exceed the State requirements regarding SCAG's RHNA allocation of 8,772 residential units.

Because of the increase in growth under this alternative in comparison to the proposed Project, the following impact analysis includes a more comprehensive analysis than typically provided for a CEQA alternatives analysis, which includes quantitative analysis, where necessary, to determine the potential impacts, and the analysis addresses all impact thresholds under Appendix G of the *CEQA Guidelines*.

6.2.2 Impact Analysis

a. Aesthetics

Scenic Vistas

As described in Section 4.1, *Aesthetics*, of this EIR, in Burbank, scenic vistas are limited to the Verdugo Mountains and Santa Monica Mountains (City of Burbank 2013). The Verdugo Mountains are located over 10 miles northeast of the Specific Plan Area and are not visible from the Specific Plan Area due to distance and intervening development. The Santa Monica Mountains are located directly south of the Specific Plan Area and, therefore, are visible from the Specific Plan Area with partial obstruction due to existing development. The Increased Growth Alternative would involve growth on the same opportunity sites identified for the proposed Project but at higher densities, and would involve the development of taller buildings to accommodate these higher densities. However, development projects under the Increased Growth Alternative would not substantially alter views of the Santa Monica Mountains due to the existing urbanized nature of the Specific Plan Area. Thus, the Increased Growth Alternative would result in a less-than-significant impact and impacts would be **similar to** the proposed Project. (*Similar impact*)

Scenic Resources Within a State Scenic Highway

As described in Section 4.1, *Aesthetics*, there are no existing or proposed county or State scenic highways in or near the Specific Plan Area; therefore, future development project under the Increased Growth Alternative would not result in any damage to scenic resources within a State scenic highway. Thus, no impact would occur, **similar to** the proposed Project. (*Similar impact*)

Consistency with Applicable Scenic Quality Regulations

Similar to the proposed Project, the Increased Growth Alternative would concentrate development in areas with opportunities for infill and intensification in a highly urbanized area. Any development

project under the Increased Growth Alternative would be required to be consistent with City-related plans, policies, and regulatory requirements. Thus, impacts related to consistency with applicable regulations would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Light and Glare

As shown in Table 6-6, the Increased Growth Alternative would result in more development in the Specific Plan Area, which would introduce additional light sources and increased light and glare impacts. However, the Specific Plan Area is characterized by existing residential and commercial development uses that already generate high ambient levels of nighttime lighting. Accordingly, any additional lighting from new development under the Increased Growth Alternative would be incremental. During design review, building materials would be reviewed to ensure consistency with the overall vision for the Specific Plan Area. Additionally, development projects under the Increased Growth Alternative would be required to comply with the BMC, which regulates the outdoor lighting positioning to not shine or cause glare to right-of-way pedestrians or vehicles, and the light intensity of signs that could impact neighboring light-sensitive uses through the following provisions:

- Section 10-1-628(W)(2). Outdoor lighting fixtures must be positioned and directed so as not to shine or cause glare onto adjacent properties or public rights-of-way.
- Section 10-1-628(W)(3). Free-standing lighting fixtures must be no taller than eight (8) feet as measured from the abutting ground surface or floor level.
- Section 10-1-1153(A). Building Elevations facing a residential zone with 50 percent or more of the building surface in glass shall be limited to a maximum of 15 percent reflectivity for those materials. Building elevations facing a residential zone with less than 50 percent of surface glass shall be limited to a maximum of 20 percent reflectivity for those materials.

Glare is a common phenomenon throughout Burbank primarily due to the occurrence of a high number of days per year with direct sunlight and the urbanized nature of the Specific Plan Area. Daytime glare can result from sunlight reflecting off glass, other structural fixtures of buildings, and windshields of parked and moving vehicles within the roadways in the Specific Plan Area. Future development under the Increased Growth Alternative would be required to comply with BMC standards and regulations for lighting and glare affecting sensitive residential uses. Therefore, impacts related to increased light and glare under implementation of the Increased Growth Alternative would be less than significant and **similar to** the proposed Project. (*Similar impact*)

a. Air Quality

Consistency with Applicable Air Quality Plans

SCAQMD has established criteria for determining consistency with the currently applicable AQMP in Chapter 12, 12.3 of the SCAQMD CEQA Air Quality Handbook. These criteria are as follows (SCAQMD 1993):

- Criterion 1: Whether the project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Criterion 2: Whether the project will exceed the assumptions in the AQMP or increments based on the year of project buildout and phase.

Criterion 1

To address the first criterion, four sample construction scenarios have been modeled and results may be found in in Table 4.2-7 in Section 4.2, *Air Quality*, of this EIR. While these scenarios in particular would not result in emissions that exceed the SCAQMD regional thresholds, construction of individual projects under the Increased Growth Alternative would continue to have the potential to exceed SCAQMD regional thresholds, similar to the proposed Project, especially for projects with large amounts of soil movement or a large quantity of workers or equipment. In addition, an operational scenario upon buildout of the Increased Growth Alternative was also modeled and results may be found in Table 6-7 below. Operation of future development projects under the Increased Growth Alternative would generate criteria air pollutant emissions associated with area sources (e.g., fireplaces, architectural coatings, consumer products, and landscaping equipment), energy sources (e.g., use of natural gas for space and water heating and cooking), and mobile sources (e.g., vehicle trips to and from the project site) at a greater level than the proposed Project. Emissions associated with future development projects under the Increased Growth Alternative, depending on project type and size, could exceed project-specific thresholds established by SCAQMD. However, such projects would be required to undergo independent, project-level CEQA review and include mitigation measures, if necessary, to address potentially significant impacts. Therefore, as the Increased Growth Alternative has the potential to cause or contribute to new violations, the Increased Growth Alternative would be inconsistent with Criterion 1, and impacts would be potentially significant, similar to the proposed Project, but to a greater extent due to the increased emissions associated with the Increased Growth Alternative. No mitigation measures are available to reduce impacts related to Criterion 1 to a less-than-significant level. The Increased Growth Alternative would result in significant and unavoidable impacts related to Criterion 1 but **greater than** the proposed Project. (*Greater impact*)

Criterion 2

The Increased Growth Alternative would result in an increase in density in comparison to the proposed Project, which would result in a greater anticipated population increase. Similar to the proposed Project, the Increased Growth Alternative would be consistent with AQMP control measures to reduce air pollution, but as detailed below under Section 6.2.2(k), the Increased Growth Alternative would exceed SCAG's 2035 housing forecast by 12,169 units. Thus, the Increased Growth Alternative would be inconsistent with the AQMD, similar to the proposed Project, but to a greater extent due to the increased development and increased emissions associated with the Increased Growth Alternative. No mitigation measures are available to reduce impacts related to Criterion 2 to a less-than-significant level. The Increased Growth Alternative would result in significant and unavoidable impacts related to Criterion 2 but **greater than** the proposed Project. (*Greater impact*)

Cumulatively Considerable Net Increase of Criteria Pollutants

Similar to the proposed Project, development facilitated by the Increased Growth Alternative would generate short-term air pollutant emissions associated with use of heavy-duty construction equipment; truck trips hauling debris, soils, and construction materials; and fugitive dust from demolition and grading. Additionally, long-term air pollutant emissions would result from mobile sources (motor vehicle exhaust), energy use (natural gas combustion), and area sources, such as hearths, landscaping equipment, consumer products, and architectural coatings. As described below, the Increased Growth Alternative would generate long-term operational emissions that exceed the SCAQMD regional thresholds and would contribute to a cumulatively considerable net increase of

criteria pollutants. Impacts would be potentially significant, but **greater than** the proposed Project, as further described below under Operational Emissions. (*Greater Impact*)

Construction Emissions

The extent of daily emissions, particularly nitrogen oxide (NO_X) emissions, generated by construction equipment, would depend on the equipment used and the hours of operation for each individual development project. The extent of particulate matter with diameters of up to 2.5 microns ($PM_{2.5}$) and up to ten microns (PM_{10}) emissions would depend upon the following factors: 1) the amount of disturbed soils; 2) the length of disturbance time; 3) whether existing structures are demolished; 4) whether excavation is involved; and 5) whether transporting excavated materials off site is necessary. The extent of volatile organic compound (VOC) emissions would primarily depend on the square footage of buildings being painted and asphalt surfaces being paved each day.[4]

As discussed in Section 4.2, *Air Quality*, the SCAQMD has not established plan-level significance thresholds for construction air pollutant emissions. Given the programmatic nature of the proposed Project and Increased Growth Alternative, sufficient detail (e.g., construction schedule, amount of soil export, specific buildout parameters) of the future development projects under the Increased Growth Alternative is not available to perform project-level analysis, and, thus, it would be speculative to analyze project-level impacts. Therefore, a more qualitative approach to characterizing construction-related air emissions has been employed for this analysis.

The Increased Growth Alternative would result in 14,312 residential units, 7,265,850 square feet of non-residential uses, and 400 hotel rooms.[5] The estimated construction emissions scenarios identified in the proposed Project, as shown in Table 4.2-7 in Section 4.2, *Air Quality*, would also apply for the Increased Growth Alternative.

Results of the emissions modeling demonstrate that daily emissions of NO_X from heavy-duty diesel equipment and trucks during construction activities would approach but not exceed the SCAQMD regional thresholds under reasonably expected circumstances for projects that involve the use of 15 pieces of equipment and 195 heavy truck trips per day. However, projects associated with the Increased Growth Alternative with large amounts of soil import/export or smaller projects with a large quantity of workers may result in larger emissions than those analyzed in Table 4.2-7 in Section 4.2, *Air Quality*, and have the potential to exceed SCAQMD regional thresholds. Therefore, construction activity accommodated under the Increased Growth Alternative would result in a potentially significant impact related to regional construction emissions of NO_X,, similar to the proposed Project. The impact includes potential exposure of sensitive receptors to high concentrations of NO_2, which may result in adverse health effects such as breathing difficulties.

Similar to the proposed Project, future development projects under the Increased Growth Alternative would be subject to compliance with applicable SCAQMD rules, including Rule 401 (Visible Emissions), Rule 402 (Nuisance), Rule 403 (Fugitive Dust), and Rule 1113 (Architectural Coatings). Specifically, Rule 403 requires the use of best available control measures for all construction activities to reduce fugitive dust emissions. Rule 403 compliance by individual property owners, developers, and/or contractors would reduce temporary construction-related air pollutant emissions of fugitive dust.

[4] The Increased Growth Alternative does not include any stationary sources of lead emissions, similar to the proposed Project, and would not generate substantial sources of hydrogen sulfide, vinyl chloride, or visibility reducing particles. Therefore, these pollutants are not discussed further in this analysis.

[5] Modeling assumed operation of 14,347 residential units, 600 hotel rooms, 11,789,900 square feet of office and retail use, and 63,400 square feet of school use based on the preliminary land use data from Fehr and Peers. Emissions estimates using this data set are conservative.

Furthermore, the following policies from the Burbank2035 General Plan Air Quality and Climate Change Element aim to reduce air quality impacts associated with construction activities:

Policy 1.5 Require projects that generate potentially significant levels of air pollutants, such as landfill operations or large construction projects, to incorporate best available air quality and greenhouse gas mitigation in project design.

Policy 1.6 Require measures to control air pollutant emissions at construction sites and during soil-disturbing or dust-generating activities (i.e., tilling, landscaping) for projects requiring such activities.

Similar to the proposed Project, compliance with SCAQMD rules and Burbank2035 General Plan Air Quality and Climate Change Element policies would reduce the overall level of air quality impacts associated with construction activities facilitated by the Increased Growth Alternative. Moreover, any future development projects under the Increased Growth Alternative would be required to implement additional mitigation if the project-specific analysis identifies a potential to exceed SCAQMD's regional thresholds for construction activities. Nonetheless, future development projects under the Increased Growth Alternative with large amounts of equipment, large number of hauling truck trips, or other unusual circumstances may generate criteria pollutant emissions that exceed the SCAQMD thresholds. Therefore, construction-related impacts associated with large future development projects under the Increased Growth Alternative would be considered potentially significant. Implementation of Mitigation Measure AQ-1, as identified for the proposed Project, would require air quality analysis and appropriate emission reduction measures for projects that exceed the screening criteria. However, specific reduction in emissions below the SCAQMD significance thresholds cannot be demonstrated in the absence of specific project details to assess. It is reasonable to assume that construction activities for a development project under the Increased Growth Alternative could generate emissions that would exceed the significance thresholds despite Mitigation Measure AQ-1, similar to the proposed Project. Therefore, construction impacts would be significant and unavoidable and **similar to** the proposed Project. (*Similar impact*)

Operational Emissions

The Increased Growth Alternative would result in 14,312 residential units, 7,265,850 square feet of non-residential uses, and 400 hotel rooms, which would result in increased operational air quality emissions compared to the proposed Project. As shown in Table 6-7, the buildout of the Increased Growth Alternative, as with the proposed Project, would generate criteria pollutants in excess of the SCAQMD operational regional significance thresholds for criteria air pollutants.

Table 6-7 Operational Emissions under the Increased Growth Alternative

	Daily Emissions (Pounds/Day)					
Scenario	**VOC**	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Mobile Sources	351	249	3,040	8	879	226
Area Sources	796	214	1,457	1	18	17
Energy Sources	5	85	51	1	7	7
Total	1,152	536	4,548	10	904	250
SCAQMD Regional Significance Threshold	55	55	550	150	150	55
Threshold Exceeded?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**

Note: number may not add up due to rounding.

Source: See Appendix C for modeling results and assumptions.

As SCAQMD regional significance thresholds are intended for assessment of individual development projects, comparison of criteria pollutant emissions from buildout of all future development projects under the Increased Growth Alternative to their respective thresholds is conservative. It should be noted that the Increased Growth Alternative presents potentially significant impacts to PM_{10} and $PM_{2.5}$, whereas the proposed Project does not. However, as with the proposed Project, modeling was performed to determine the largest individual project sizes that would typically be anticipated to result in emissions that do not exceed SCAQMD thresholds. These same scenarios apply to both the proposed Project and the Increased Growth Alternative. Therefore, the Increased Growth Alternative would result in a potentially significant impact, similar to the proposed Project but to a greater extent due to the increased emissions associated with the Increased Growth Alternative. Implementation of Mitigation Measure AQ-2, as identified for the proposed Project, would require air quality analysis and appropriate air pollutant emissions reduction measures for projects that exceed the screening criteria identified in Section 4.2, *Air Quality*, for large projects. While implementation of Mitigation Measure AQ-2 would reduce air pollutant emissions associated with development under the Increased Growth, there would be no further feasible mitigation to reduce VOC, NO_x CO, PM_{10}, and $PM_{2.5}$ to reduce these long-term emissions to a level below SCAQMD significance thresholds. Therefore, impacts from operational emissions would be significant and unavoidable but would be **greater than** the proposed Project.[6] (*Greater impact*)

Exposure of Sensitive Receptors to Substantial Pollutant Concentrations

Localized Emissions

SCAQMD has also developed specific Localized Significance Thresholds (LSTs) to assess construction and operational air quality impacts associated with individual development projects. The LST values are specific to the source receptor area in which an individual project is located and based on proximity to the nearest sensitive receptor(s).

A localized construction analysis would be speculative given the lack of constructions location and construction activities under the Increased Growth Alternative, similar to the proposed Project. In addition, each individual project under the Increased Growth Alternative would vary in size and distance to sensitive receptors, which affects the applicable threshold each individual project would be tied to for on-site emissions during operations. Thus, construction and operational LST emissions

[6] SCAQMD regional significance thresholds are intended for assessment of individual development projects. Therefore, comparison of criteria pollutant emissions from buildout of all future development projects under the Increased Growth Alternative to their respective thresholds is conservative.

were not quantified in this analysis since project-level data was not included for the Increased Growth Alternative, similar to the proposed Project. However, it is reasonable to assume that some individual projects developed under the Increased Growth Alternative would involve construction adjacent to sensitive receptors (e.g., residences and schools). Under certain circumstances, unmitigated equipment emissions combined with fugitive dust emissions associated with the development of future development projects under the Increased Growth Alternative could potentially exceed the LSTs for NO_X, carbon monoxide (CO), PM_{10} and $PM_{2.5}$, similar to the proposed Project. As such, development of individual projects under the Increased Growth Alternative could result in a potentially significant impact related to localized construction and operational emissions of NO_X, CO, PM_{10}, and $PM_{2.5}$. Implementation of Mitigation Measure AQ-1, as identified for the proposed Project, would require air quality analysis and appropriate emission reduction measures for projects that exceed the screening criteria. However, specific reduction in emissions below the SCAQMD significance thresholds cannot be demonstrated in the absence of specific project details to assess. It is reasonable to assume that construction and operational activities for a development project under the Increased Growth Alternative could generate emissions that would exceed the LSTs despite Mitigation Measure AQ-1 similar to the proposed Project. Therefore, impacts related to localized emissions would be significant and unavoidable and **similar to** the proposed Project. (*Similar impact*)

Carbon Monoxide Hotspots

A CO hotspot is a localized concentration of CO that is above a CO ambient air quality standard; elevated CO levels can occur at roadway intersections that experience high traffic volumes and severe vehicle congestion. Based on traffic volumes documented in Fehr & Peer's *Technical Review of Modeling and VMT Methodology for Media District Specific Plan Traffic Study Report* (see Appendix D), any single intersectional volume in the Specific Plan Area is not expected to approach anywhere near 400,000 vehicles per day. Furthermore, the Specific Plan Area does not have any intersections that would foreseeably experience daily volumes exceeding 400,000 vehicles per day. Therefore, buildout of the Increased Growth Alternative would not have potential to contribute to localized CO concentrations at intersections that exceed State CO standards and **similar to** the proposed Project. (*Similar impact*)

TOXIC AIR CONTAMINANTS CONSTRUCTION

Construction would result in various toxic air contaminants (TACs) associated with equipment exhaust and off-gassing from various materials applied during construction, such as architectural coatings, similar to the proposed Project. Of these, the TAC of primary concern associated with construction activities is diesel particulate matter (DPM), which may be released in substantial quantities by use of heavy-duty equipment operations and truck traffic.

Similar to the proposed Project, the specific locations, amount of heavy-equipment use, and duration of construction activity resulting from the Increased Growth Alternative are not currently known. Health risks associated with construction-related diesel exhaust emissions would only have potential to result in significant health risks for large projects with substantial heavy equipment use for a period of several years in proximity to sensitive receptors.

Similar to the proposed Project, future development projects under the Increased Growth Alternative would be required to implement compliance measures for California Off-Road Diesel-Fueled Fleet Regulations and idling limits for diesel-fueled vehicles, which would reduce potential diesel exhaust emissions from construction. Mitigation Measure AQ-1, as identified for the proposed Project, would require air quality analysis and appropriate air pollutant emissions reduction measures for projects

with potential for construction to include activities that generate substantial diesel exhaust, such as demolition, grading, hauling, of heavy-duty equipment use. However, specific reduction in emissions below the SCAQMD significance thresholds cannot be demonstrated in the absence of individual project details. For these reasons, construction-related impacts associated with TAC emissions would be potentially significant. It is reasonable to assume that construction activities for a development project under the Increased Growth Alternative could generate TAC emissions that would exceed the significance thresholds despite Mitigation Measure AQ-1. Therefore, the Increased Growth Alternative would potentially expose sensitive receptors to substantial pollutant concentrations during construction, and impacts would be significant and unavoidable and **similar to** the proposed Project. (*Similar impact*)

OPERATION

Residential, commercial, hotel, and office land uses analyzed under the Increased Growth Alternative are not considered land uses that generate substantial TAC emissions based on review of the air toxic sources listed in SCAQMD's and California Air Resources Board's (CARB) guidelines. As with the proposed Project, the Increased Growth Alternative also would not include substantial TAC sources and is consistent with CARB and SCAQMD guidelines. Future development projects under the Increased Growth Alternative are not anticipated to result in the exposure of off-site sensitive receptors to significant amounts of carcinogenic contaminants or TACs. Impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

ON-SITE SENSITIVE RECEPTORS

Similar to the proposed Project, future development projects under the Increased Growth Alternative would add new sensitive receptors in the Specific Plan Area. Although new residences would not exacerbate health risks related to TACs, they could be exposed to such health risks. Such exposure does not constitute a potential significant impact under CEQA, but the potential risks are provided for informational purposes. An HRA was prepared to assess the potential health effects associated with TAC emissions from SR-134 and associated ramps. For the roadways the primary concern is the effect of diesel PM on the on-site sensitive receptors combined with the other vehicle exhaust pollutants. An analysis using the United States Environmental Protection Agency's the American Meteorological Society/USEPA Regulatory Model (AERMOD) dispersion model and CARB's Hotspots Analysis and Reporting Program (HARP) risk analysis tool was used to determine the maximally exposed individual receptors (MEIR) for SR-134. The potential health risks from SR-134 at the MEIR for the Increased Growth Alternative are detailed in Table 4.2-9, Potential Health Risks from SR-134 at the MEIR, in Section 4.2, *Air Quality*. The MEIR analysis conducted for the proposed Project conservatively analyzed all potential opportunity sites, including those associated with the Increased Growth Alternative. Thus, the MEIR analysis includes full analysis of the Increased Growth Alternative. As presented in Table 4.2-9, with the application of MERV filtration, potential health risks to future residences would not exceed the SCAQMD thresholds for cancer and hazard quotient values (chronic and acute hazard risk). Thus, impacts would be **similar to** the proposed Project. (*Similar impact*)

Odor

Construction activities for any future development projects under the Increased Growth Alternative may produce temporary odors from construction related activities, such as unburned hydrocarbons from tailpipes of construction equipment and architectural coatings, similar to the proposed Project. However, such odors would disperse rapidly from the respective construction sites, and construction would be required to comply with the SCAQMD Rule 402, which regulates nuisance odors. With

respect to operation related activities, the Increased Growth Alternative would not include land uses associated with odor complaints, similar to the proposed Project. Therefore, impacts related to odor would be less than significant and **similar to** the proposed Project. (*Similar impact*)

b. Biological Resources

Adverse Effect on Candidate, Sensitive, or Special-Status Species

As shown in Table 6-6, the Increased Growth Alternative would result in an increase in development density in the Specific Plan Area in comparison to the proposed Project. Although the Increased Growth Alternative would allow for increased densities, the potential development would occur within the same urbanized Specific Plan Area and would involve similar amounts of ground disturbance compared to the proposed Project. Thus, development under the Increased Growth Alternative could impact special-status species, nesting birds, and their habitat. Similar to the proposed Project, development projects under the Increased Growth Alternative would be subject to the provisions of federal and State regulations protecting biological resources. These regulations include requirements for biological studies where potential habitat exists, and consultation with applicable regulatory agencies where special-status resources are found. Nonetheless, construction of future development projects under the Increased Growth Alternative could potentially occur during the bird nesting season, which is generally from March 1 through August 31 and begins as early as February 1 for raptors. Development under the Increased Growth Alternative would be required to implement Mitigation Measure BIO-1, as identified for the proposed Project, which would require project-specific pre-construction nesting bird surveys and nest avoidance. Similar to the proposed Project, implementation of the Mitigation Measure BIO-1 would reduce the Increased Growth Alternative's potential impacts to special-status species, nesting birds, and their habitat to a less-than-significant level. Impacts would be **similar to** the proposed Project. (*Similar impact*)

Adverse Effect on Riparian Habitat or Sensitive Natural Community

As described in Section 4.3, *Biological Resources*, of this EIR, the Specific Plan Area does not include any documented sensitive natural communities, including wetlands or riparian habitats. The 0.11-mile-long portion of the Los Angeles River that occurs along the southern boundary of the Specific Plan Area is channelized and not conducive to supporting riparian or wetland habitat. Any future development project under the Increased Growth Alternative would occur in urbanized areas and, therefore, would not directly or indirectly impact sensitive natural communities or riparian habitat, similar to the proposed Project. Impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Adverse Effect on Protected Wetlands

As described in Section 4.3, *Biological Resources*, the Specific Plan Area lies within an existing potential habitat patch. A habitat patch is defined as an area that may provide habitat and water for species, such as migratory birds, or is located near a strategic location, such as an existing habitat area buffer or linkage or confluence (Los Angeles County 2022). However, the United States Fish and Wildlife Service National Wetland Inventory does not indicate any additional aquatic resources within the Specific Plan Area. Any future development project in the Specific Plan Area under this alternative with potential to impact the Los Angeles River would be required to comply with Section 1602 of the California Fish and Game Code (CFGC) and Sections 401 and 404 of the Clean Water Act (CWA). Adherence to these regulations would mitigate substantial adverse impacts to the Los Angeles River

by requiring projects to obtain proper permitting and implement regulatory procedures. Therefore, impacts related to protected wetlands would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Interference with Wildlife Movement As described in Section 4.3, *Biological Resources*, the Specific Plan Area is urbanized, and, as such, there are no known regional wildlife habitat linkages or described wildlife movement within the Specific Plan Area. The Specific Plan Area's urban environment generally does not facilitate the movement of wildlife species that are not adapted to urban and suburban areas. The Los Angeles River channel may act as an urban corridor for local wildlife movement, and migratory birds could utilize water within the concrete-lined channels during migration. The utilization of the Los Angeles River as an urban corridor or water source would not be affected by any future development project under the Increased Growth Alternative because any development near the already-disturbed Los Angeles River channel would adhere to CFGC and CWA requirements and would not encroach into the Los Angeles River more than current conditions, similar to the proposed Project. Therefore, impacts related to wildlife movement would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Conflict with Local Policies or Ordinances Protecting Biological Resources

Similar to the proposed Project, development under the Increased Growth Alternative may involve the removal of public trees. In the event that individual future development projects under the Increased Growth Alternative would include removal of public trees, the project applicant would be required to obtain permits for consistency with Title 7 (Public Ways and Property), Chapter 4 (Trees and Vegetation) of the BMC. Compliance with the BMC would ensure the Increased Growth Alternative would have no impact related to tree preservation ordinances, **similar to** the proposed Project. (*Similar impact*)

Conflict with Adopted Habitat Conservation Plans

As described in Section 4.3, *Biological Resources*, the Specific Plan Area is not within an area subject to an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved conservation plans. Therefore, no impacts related to the provisions of a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved conservation plan would occur, **similar to** the proposed Project. (*Similar impact*)

c. Cultural Resources

Historical Resources

As shown in Table 6-6, the Increased Growth Alternative would result in increased density at the same potential development sites and would involve similar amounts of ground disturbance in comparison to the proposed Project, which could cause a substantial adverse change in the significance of a historical resource through the demolition, construction, and reconstruction activities. No designated historic resources are included as opportunity sites for the proposed Project or Increased Growth Alternative. Development under the Increased Growth Alternative would be required to comply with the City's Historic Preservation Regulations and the Burbank2035 General Plan Program LU-4: Historic Preservation Plan. The City's regulations and programs would help mitigate impacts to designated and eligible historical resources by requiring, in certain cases, adherence to the standards and other requirements intended to preserve the character-defining features of individual historical resources and historic districts that qualify them as historical resources pursuant to CEQA. However, the City's

regulations do not in all cases prevent demolition or substantial alteration of designated and eligible historical resources. Thus, the Increased Growth Alternative would implement Mitigation Measure CUL-1, as identified for the proposed Project, which would require demonstration of historical resources protection. While implementation of Burbank2035 General Plan Program LU-4 and Mitigation Measure CUL-1 would reduce impacts related to historical resources, these measures could not successfully mitigate impacts to a less-than-significant level; therefore, impacts to historical resources would be significant and unavoidable and **similar to** the proposed Project. (*Similar impact*)

Archaeological Resources

As shown in Table 6-6, the Increased Growth Alternative would result in increased density at the same potential development sites and would involve similar amounts of ground disturbance in comparison to the proposed Project, which could damage or destroy previously unknown archaeological resources that may be present on or below the ground surface. Development under the Increased Growth Alternative would comply with the City's Historic Preservation Regulations and the Burbank2035 General Plan Program LU-4: Historic Preservation Plan. However, the City's regulations do not in all cases prevent damage to previously unknown archaeological resources. Thus, development under the Increased Growth Alternative would require implementation of Mitigation Measures CUL-2(a) through CUL-2(c), as identified for the proposed Project, which would require project-specific archaeological resources assessments and provides evaluation and treatment standards for the unanticipated discovery of cultural resources. Adherence to the City's regulations and Mitigation Measures CUL-2(a) through CUL-2(c) would reduce potential impacts related to archaeological resources to a less-than-significant level and **similar to** the proposed Project. (*Similar impact*)

Human Remains

As shown in Table 6-6, the Increased Growth Alternative would result in increased density at the same potential development sites and would involve similar amounts of ground disturbance in comparison to the proposed Project, which could disturb unidentified human burials outside of formal cemeteries during construction activities. Development under the Increased Growth Alternative would be required to comply with the California Health and Safety Code (Sections 7050.5, 7051, and 7054), PRC Section 5097.98, City's Historic Preservation Regulations, and the Burbank2035 General Plan Program LU-4: Historic Preservation Plan. Adherence to existing State and local regulations would reduce potential impacts related to human remains to a less-than-significant level and **similar to** the proposed Project. (*Similar impact*)

d. Energy

Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

Construction

As shown in Table 6-6, the Increased Growth Alternative would result in increased density at the same potential development sites in comparison to the proposed Project. Future development under the Increased Growth Alternative is anticipated to require more intense building construction, such as increased heights, deeper subterranean activities, expanded architectural coating, more construction traffic, and prolonged construction schedules in comparison to development under the proposed Project. During construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on construction sites, construction worker

vehicle travel to and from construction sites, and vehicles used to deliver materials to construction sites.

Similar to the proposed Project, energy use during construction would be temporary in nature and construction equipment used would be typical of similar-sized construction projects in the region. In addition, construction contractors would be required to comply with the provisions of the CCR Title 13 Sections 2449 and 2485, which would minimize unnecessary fuel consumption by prohibiting diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes. Furthermore, per applicable regulatory requirements such as the 2022 CALGreen Code, future development projects under the Increased Growth Alternative would be required to comply with construction waste management practices to divert a minimum of 65 percent of construction debris. These practices would result in efficient use of energy necessary to construct future development projects under the Increased Growth Alternative, similar to the proposed Project. In the interest of cost-efficiency, construction contractors also would not utilize fuel in a manner that is wasteful or unnecessary. Overall, construction for development under the Increased Growth Alternative would be temporary and typical of that associated with development throughout the region. Therefore, future development under the Increased Growth Alternative would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the construction-phase impact related to energy consumption would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Operation

As shown in Table 6-6, the Increased Growth Alternative would result in more development in the Specific Plan Area. Operation of future development projects under the Increased Growth Alternative would contribute more to regional energy demand than the proposed Project by consuming electricity, natural gas, and gasoline and diesel fuels. More natural gas and electricity may be used for heating and cooling systems, lighting, and appliances, among other purposes, compared to the proposed Project. Gasoline and diesel consumption would be associated with vehicle trips generated by customers and employees.

Similar to the proposed Project, all new development in the Increased Growth Alternative would be required to comply with all standards set in the latest iteration of the California Building Standards Code (CCR Title 24), which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources by the built environment during operation. California's CALGreen Code standards (CCR Title 24, Part 11) require implementation of energy-efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2022 Building Energy Efficiency Standards (CCR Title 24, Part 6) require newly constructed buildings to meet energy performance standards set by the California Energy Commission. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. Furthermore, the proposed land use changes would increase housing density and encourage mixed-use development near existing commercial uses and existing transit stops, which would facilitate the use of transit and alternative transportation modes, such as walking and biking. According to the Technical Review of Modeling and VMT Methodology for Media District Specific Plan Traffic Study Report prepared for the proposed Project, the Increased Growth Alternative would produce 436,231 daily VMT, which would be an increase from the proposed Project's anticipated 343,134 daily VMT (Appendix D).As described above, the Increased Growth Alternative would not result in potentially significant environmental effects due to the wasteful, inefficient, or unnecessary consumption of energy; however, the increase in total daily VMT would result in a greater fuel consumption associated with the Increased Growth Alternative.

Thus, impacts would be less than significant the proposed Project, but **greater than** the proposed Project. (*Greater impact*)

Conflict with Renewable Energy or Energy Efficiency Plan

Similar to the proposed Project, development under the Increased Growth Alternative would be required to comply with the most recent Title 24 standards, including the CALGreen Code requirements, applicable goals and policies of SCAG's 2024-2050 RTP/SCS and the Burbank2035 General Plan, and applicable reduction measures of the City's 2022 GGRP Update. Thus, the Increased Growth Alternative would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

e. Geology and Soils

Fault Rupture

The Increased Growth Alternative would occur within the same Specific Plan Area, which is not located within an Alquist-Priolo Earthquake Fault Zone, and no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Specific Plan Area. Since there are no known active or potentially active faults passing through the Specific Plan Area, on-site ground rupture due to movement of an underlying fault would not occur and impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Ground Shaking

The Increased Growth Alternative would occur within the same Specific Plan Area, which is within the highly seismic Southern California region, where several fault systems are active or potentially active. Similar to the proposed Project, future development projects under the Increased Growth Alternative may be subject to ground shaking in the event of an earthquake originating along one of the faults designated as active or potentially active in the Southern California region. Ground shaking is common throughout California, and, as such, future development projects under the Increased Growth Alternative would pose no greater risk to public safety or destruction of property than is already present throughout the region. Compliance with applicable State and local regulations would ensure impacts related to ground shaking would remain less than significant; however, the Increased Growth Alternative would introduce more development to the Specific Plan Area, increasing the number of people exposed to ground shaking. Thus, impacts would be less than significant **but greater than** the proposed Project. (*Greater impact*)

Liquefaction

The Increased Growth Alternative would occur within the same Specific Plan Area, which is within a liquefaction hazard zone. Similar to the proposed Project, future development projects under the Increased Growth Alternative would not exacerbate liquefaction potential in the area than is already present throughout the region. Compliance with applicable State and local regulations would ensure impacts related to liquefaction would remain less than significant; however, the Increased Growth Alternative would introduce more development to the Specific Plan Area, increasing the number of people exposed to liquefaction. Thus, impacts would be less than significant **but greater than** the proposed Project. (*Greater impact*)

Landslides

The Increased Growth Alternative would occur within the same Specific Plan Area, which is located in an urbanized area that is relatively flat and no portion of the Specific Plan Area is located in a landslide hazard zone designated by the Department of Conservation. Compliance with State and local regulations would ensure that no landslide impacts would occur. Therefore, the proposed Project would not directly or indirectly cause impacts related to landslides and impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Soil Erosion

Similar to the proposed Project, ground-disturbing activities associated with construction of development projects under the Increased Growth Alternative would have the potential to result in the removal and erosion of topsoil during grading and excavation. Standard construction BMPs would be implemented to avoid or minimize soil erosion associated with ground-disturbing activities. Compliance with applicable State and local regulations would ensure impacts related to soil erosion would remain less than significant and **similar to** the proposed Project. (*Similar impact*)

Unstable Soils

The Increased Growth Alternative would occur within the same Specific Plan Area, which is within a liquefaction hazard zone and would be susceptible to liquefaction and lateral spreading. However, the Specific Plan Area is not within a landslide hazard zone or area subject to land subsidence and would not be susceptible to landslides or subsidence. Compliance with applicable State and local regulations would ensure impacts related to unstable soils, including lateral spreading, liquefaction, or collapse would remain less than significant; however, the Increased Growth Alternative would introduce more development to the Specific Plan Area, increasing the number of people exposed to unstable soils. Thus, impacts would be less than significant **but greater than** the proposed Project. (*Greater impact*)

Expansive Soils

The Increased Growth Alternative would occur within the same Specific Plan Area, which is located on loamy and sandy soils that do not have a high clay content, decreasing chances of substantial risks to life or property due to expansive soils. Similar to the proposed Project, new development under the Increased Growth Alternative built on potentially expansive soils would be required to comply with the CBC, which includes requirements to address soil-related hazards. Compliance with the requirements of the CBC would ensure that impacts related to expansive soils would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Septic Tanks

The Specific Plan Area is served by a community wastewater system. Per BMC Section 8-1-308, all new development associated with the Increased Growth Alternative must be connected to the City's wastewater system, similar to the proposed Project. Therefore, there would be no impact related to the use of septic tanks or alternative wastewater disposal systems, **similar to** the proposed Project. (*Similar impact*)

Paleontological Resources

As shown in Table 6-6, the Increased Growth Alternative would result in increased density at the same potential development sites and would involve similar amounts of ground disturbance in comparison to the proposed Project; thus, the alternative would result in more intense ground-disturbing activities that may require deeper subterranean activities. As such, the potential to damage or destroy previously unknown paleontological resources or unique geologic features that may be present on or below the ground surface would be higher in comparison to the proposed Project. However, the Increased Growth Alternative would implement Mitigation Measure GEO-1, as identified for the proposed Project, which would require project-specific paleontological resources assessment. Implementation of Mitigation Measure GEO-1 would reduce the Increased Growth Alternative's potential impacts to paleontological resources to a less-than-significant level and **similar to** the proposed Project. (*Similar impact*)

f. Greenhouse Gas Emissions

2022 Scoping Plan (SB 32 Implementation)

There are numerous State plans, policies, and regulations adopted to reduce GHG emissions. The principal policy and State plans are SB 32 and the State Scoping Plan that outlines the strategies for reducing GHG emissions to meet the 2030 GHG reduction targets. The Scoping Plan measures that are applicable to development projects under this alternative include energy efficiency measures, water conservation and efficiency measures, and transportation and motor vehicle measures, as discussed below.

Growth under the Increased Growth Alternative would be concentrated in locations where a majority of the Specific Plan Area is within a transit priority area (TPA) under SCAG's 2024-2050 RTP/SCS. TPA refers to an area within 0.5 mile of a major transit stop that is existing or planned. By focusing future development in areas with existing transit infrastructure, the Increased Growth Alternative would minimize growth in low-density areas of the Specific Plan Area, which contributes to reducing reliance on automotive travel, VMT, and associated emissions (SCAG 2024). Similar to the proposed Project, the Increased Growth Alternative would be consistent with the goals and policies of the 2022 Scoping Plan. Development under the Increased Growth Alternative would be required to comply with the latest Title 24 Building Energy Efficiency Standards (CCR Title 24, Part 6) and CALGreen Code standards (CCR Title 24, Part 11), which would promote building decarbonization and maximizing recycling and would comply with the Scoping Plan's goals to decarbonize the built environment. Therefore, similar to the proposed Project, the Increased Growth Alternative would not conflict with the 2022 Scoping Plan and impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

GHG Emissions Generation

Development accommodated under the Increased Growth Alternative would generate more GHG emissions through the construction and operation of individual projects that would be higher in density in comparison to the proposed Project. GHG emissions would specifically arise from direct sources, such as motor vehicles, natural gas consumption, solid waste handling/treatment, and indirect sources, such as electricity generation. However, development under this alternative would be consistent with measures and GHG reduction strategies from the State Scoping Plan, and as discussed below, would also be consistent with the goals of the 2024-2050 RTP/SCS and the City's GGRP Update. Therefore, similar to the proposed Project, impacts related to GHG emissions under

the Increase Growth Alternative would be less than significant but **greater than** the proposed Project. (*Greater impact*)

Table 6-8 shows the estimates for GHG emissions based on the increase in housing and the additional commercial uses associated with the Increased Growth Alternative.

Table 6-8 GHG Emissions under the Increased Growth Alternative

GHG Emissions under the Increased Growth Alternative Source	Forecasted Activity Level Increase (2035)	Forecasted 2035 GHG Emissions (MTCO2e)
Transportation	111.8 Million Residential VMT/year 142.91 Million Employment VMT/year	137,896
Area Sources	–	3,421
Electricity	270 GWh/year[1]	46,328
Natural Gas	329 Million kBTU/year[1]	
Water Supply		5,133
Indoor Water	2,448 Million Gallons/year	
Outdoor Water	34.8 Million Gallons/year	
Solid Waste	22,212 tons	6,934
Refrigerant	2 kg	248
Construction Emissions (Amortized)	–	2,798
Total	**–**	**101,603**

[1] Energy use estimates are conservative. Estimates do not account for energy efficiency measures required by the 2022 Title 24 energy efficiency or potential energy efficiency measures required by subsequent Title 24 updates in 2025 and 2028.

VMT = Vehicle Miles Traveled; GWh = Gigawatt-hours: kBTU = kilo British Thermal Units: kg = kilograms

Source: Refer to Appendix C for modeling results.

SCAG's 2024-2050 RTP/SCS (SB 32 Implementation) Consistency

The 2024-2050 RTP/SCS integrates land use and transportation strategies to help achieve a coordinated and balanced regional transportation system. SCAG's 2024-2050 RTP/SCS is a regional plan intended to reduce GHG emission from automobiles and light trucks for the SCAG region to 19 percent below 2005 levels by 2035. The SCS implementation strategies include focusing growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, and supporting implementation of sustainability policies. As detailed below in Section 6.2.2(n), the Increased Growth Alternative would result in a greater reduction of VMT per service population from the baseline 2023 conditions compared to the proposed Project.

Similar to the proposed Project, the Increased Growth Alternative would focus on developing and implementing policies and programs to remove barriers to housing production, streamline the permitting process, and introduce objective design standards for new development within the Specific Plan Area. The City identified groupings of underutilized sites within the Specific Plan Area as opportunities for infill and adaptive reuse. These sites are referred to as opportunity sites and would assist in meeting the City's goals of contextual development, transit-oriented growth, and streamlined housing production. Therefore, similar to the proposed Project, the Increased Growth Alternative would not conflict with SCAG's 2024-2050 RTP/SCS. Impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Greenhouse Gas Reduction Plan Consistency

The City of Burbank adopted the GGRP in 2013, which was updated in 2022. Guided by the framework set forth in the Burbank2035 General Plan, the GGRP implements Goal 3 from the Air Quality and Climate Change Element and associated Policies 3.1 and 3.2. Policy 3.1 establishes the target for Burbank to reduce communitywide GHG emissions by at least 15 percent from 2010 baseline levels by 2020; and Policy 3.2 establishes the goal to reduce emissions by at least 30 percent from 2010 baseline levels by 2035. Similar to the proposed Project, the Increased Growth Alternative would be consistent with the goals and policies of the GGRP, and as such, there would not be a conflict with the GGRP.

In summary, the Increased Growth Alternative would be consistent with all applicable plans and policies, including the 2022 Scoping Plan, the 2024-2050 RTP/SCS, and the GGRP, similar to the proposed Project. Therefore, impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

g. Hazards and Hazardous Materials

Routine Transport, Use, or Disposal of Hazardous Materials

As described in Section 4.8, *Hazards and Hazardous Materials*, of this EIR, residential uses do not utilize hazardous materials and, therefore, pose minimal risk of exposing the public to hazardous materials; however, the introduction of commercial development may result in an incremental increase in the use and generation of hazardous materials. As shown in Table 6-6, the Increased Growth Alternative would result in increased development in comparison to the proposed Project; thus, the alternative would result in an incremental increase in the routine transport, use, or disposal of hazardous materials. All development projects under the Increased Growth Alternative that handle or use hazardous materials would be required to comply with all applicable local, state and federal laws related to storage, use, and disposal of hazardous materials, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, CCR Title 22, California Fire Code, and guidelines established by the United States Environmental Protection Agency, similar to the proposed Project. Compliance with federal, State, regional, and local regulations, standards, and guidelines related to hazardous materials would ensure that impacts would remain less than significant; however, the Increased Growth Alternative would introduce more development to the Specific Plan Area, increasing the number of people exposed to these hazardous materials. Therefore, impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Release of Hazardous Materials

As shown in Table 6-6, the Increased Growth Alternative would result in an increase in density in comparison to the proposed Project; thus, the alternative would result in an incremental increase in the use of hazardous materials and/or the generation of hazardous materials. As with the proposed Project, this alternative could involve demolition of existing structures with lead and asbestos. Similar to the proposed Project, the Increased Growth Alternative would comply with CCR Title 8 Section 1532.1 and Section 1529, which require testing, monitoring, containment, and disposal of lead-based materials and asbestos-based materials such that exposure levels do not exceed Cal/OSHA standards. Development under the Increased Growth Alternative would also comply with the regulations and standards of the Federal Clean Air Act, SCAQMD Rule 1403, and the Burbank2035 General Plan Safety Element Policies 8.1 through 8.8. Compliance with federal, State, regional, and local regulations,

standards, and guidelines related to the use of hazardous materials and/or the generation of hazardous materials would ensure that impacts would remain less than significant; however, the Increased Growth Alternative would introduce more development to the Specific Plan Area, increasing the number of people potentially exposed to these hazardous materials. Therefore, impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Hazardous Materials Within 0.25-Mile of School

The Increased Growth Alternative would occur within the same Specific Plan Area. As shown in Figure 4.8-1 in Section 4.8, *Hazards and Hazardous Materials*, there are three schools within the Specific Plan Area—Providence High School, Joyful Zen Preschool and Toluca Playhouse Preschool, and three schools within 0.25 mile of the Specific Plan Area—R. L. Stevenson Elementary School, and Saint Finbar School, and Rio Childcare. Accidental release or combustion of hazardous materials at both existing and new commercial developments in the Specific Plan Area could risk exposure of the schools listed above in the Specific Plan Area and the surrounding community to these substances. Specifically, demolition, grading, and excavation activities associated with future construction may result in emissions and transport of hazardous materials. The Increased Growth Alternative would result in an increase in density at the same potential development sites as the proposed Project and, thus, would result in an incremental increase in opportunities for development to emit hazardous emissions within 0.25 mile of a school.

Similar to the proposed Project, implementation of the Increased Growth Alternative would prioritize future development projects on infill sites in already developed areas of the Specific Plan Area. Similar to the proposed Project, any future development project under the Increased Growth Alternative would comply with the policies and goals of Burbank2035 General Plan. Specifically, Policy 2.7 of the Burbank2035 General Plan Land Use Element requires that the land use policies are equitably enforced to protect all people, including students of nearby schools, equally from adverse environmental effects. Additionally, all businesses that handle or necessitate transport of hazardous materials are required to comply with the provisions of the City's Fire Code and any additional provisions as required in the California Health and Safety Code Division 20, Chapter 6.95, *Hazardous Materials Release Response Plans and Inventory*. Compliance with applicable State and local regulations would ensure impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Hazardous Material Sites

The Increased Growth Alternative would occur within the same Specific Plan Area which includes hazardous materials sites compiled pursuant to Government Code Section 65962.5; a full list of these sites and their clean up status can be reviewed in Appendix F. The Increased Growth Alternative would result in an increase in density at the same potential development sites as the proposed Project and, thus, would result in the same opportunities for development to be located on a hazardous materials site, and development could potentially impact USTs. The Increased Growth Alternative would implement Mitigation Measure HAZ-1, as identified for the proposed Project, which would require project-specific pre-construction Phase I ESAs for project sites not listed in specified resources and Phase II ESAs for project sites listed in Appendix F. Implementation of Mitigation Measure HAZ-1 would reduce potential impacts to a less-than-significant level and **similar to** the proposed Project. (*Similar impact*)

Airport Hazards

As described in Section 4.8, *Hazards and Hazardous Materials*, the Specific Plan Area is not within or near any Airport Influence Area defined by the Los Angeles County Airport Land Use Plan, including the Hollywood Burbank Airport. Therefore, development under the Increased Growth Alternative would not be at risk of airport-related hazards or excessive noise, similar to the proposed Project. Thus, impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Interference With Emergency Response or Evacuation Plans

As shown in Table 6-6, the Increased Growth Alternative would result in more development than the proposed Project. However, similar to the proposed Project, there are no proposed physical changes, such as roadway construction, under the Increased Growth Alternative that would interfere or impair emergency response or evacuation. The proposed Project would not result in changes to emergency evacuation routes. Additionally, similar to the proposed Project, development facilitated by the Increased Growth Alternative would be required to accommodate for transportation demands for future development. Similar to the proposed project, future development under the Increased Growth Alternative would be reviewed to ensure consistency with applicable City and State design standards and emergency access requirements to ensure development would not interfere with evacuation routes or evacuation plans. Thus, impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Wildland Fires

The Increased Growth Alternative would occur within the same urbanized Specific Plan Area, which includes a VHFHSZ in an LRA in the southern portion of the Specific Plan Area. Similar to the proposed Project, compliance with the Burbank2035 General Plan Safety Element Policies 4.3, 4.4, 4.6, and 4.7 and the building standards of the City of Burbank and the most recent CBC would reduce potential impacts related to wildland fires. Thus, impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

h. Hydrology and Water Quality

Degradation of Surface or Ground Water Quality

As shown in Table 6-6, the Increased Growth Alternative would result in increased density at the same potential development sites and would involve similar areas of ground disturbance in comparison to the proposed Project. While construction of future development under the Increased Growth Alternative could impact surface or ground water quality due to erosion resulting from exposed soils and the generation of water pollutants, adherence to applicable existing regulations would reduce impacts to a less-than-significant level. Impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Decreased Groundwater Supplies and Groundwater Recharge

Similar to the proposed Project, construction activities associated with future development under the Increased Growth Alternative, such as excavation for subterranean parking lots and foundation-laying for tall buildings, could potentially require dewatering and could extend into the underlying groundwater table. Construction of development projects under the Increased Growth Alternative would be required to comply with appropriate Dewatering Permit Requirements and groundwater

contamination BMPs, similar to the proposed Project. With implementation of appropriate construction BMPs, impacts on groundwater resources would be minimized, and impacts related to supply and recharge would be less than significant **and similar to** the proposed Project. (*Similar impact*)

The Increased Growth Alternative would increase demand for water during construction and operation, some of which would derive from groundwater sources since groundwater is a part of the supply mix for BWP. The Increased Growth Alternative would implement typical construction BMPs to prevent contamination of stormwater during construction and would comply with requirements of the NPDES Construction General Permit Order Number R4-2012-0175 and the CBC to ensure that construction activities would not substantially deplete groundwater supplies. Similar to the proposed Project, groundwater use by future development projects under the Increased Growth Alternative are not anticipated to cause significant impacts to groundwater levels because the San Fernando Basin is determined to be a 'very low' priority basin by DWR under SGMA, is not in overdraft, and is utilized by numerous water agencies as only a part of the supply mix for the area. Additionally, groundwater from other basins is not expected to be utilized by projects carried out under the Increased Growth Alternative because existing supply is more than adequate. Therefore, the Increased Growth Alternative would not substantially deplete groundwater supplies and impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Alteration of the Existing Drainage Pattern

As identified in Section 4.9, *Hydrology and Water Quality*, of this EIR, the opportunity sites for development under the proposed Project and Increased Growth Alternative are primarily paved and/or previously developed with structures. Therefore, although the Increased Growth Alternative would result in an increase in density compared to the proposed Project, development under the Increased Growth Alternative would not be anticipated to substantially alter drainage patterns or alter drainage patterns to the extent that would result in substantial erosion, siltation, or flooding on- or off-site. Furthermore, the uses associated with the Increased Growth Alternative (i.e., residential and commercial) would not be sources of high levels of stormwater pollution upon operation. In addition, the Specific Plan Area is not located within a 100-year flood hazard area, and the Increased Growth Alternative would not place housing or structures such that flood flows would be impeded or redirected, similar to the proposed Project. Therefore, future development projects under the Increased Growth Alternative would not substantially alter the existing drainage pattern of the Specific Plan Area in a manner that would result in substantial erosion or siltation on- or off-site, increase the rate or amount of surface runoff that would result in flooding on- or off-site, or impede or redirect flood flows similar to the proposed Project. Impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Release of Pollutants Due to Project Inundation

As identified in Section 4.9, *Hydrology and Water Quality*, nearby enclosed bodies of water surrounding the City are not considered large enough to result in considerable risk of inundation in Burbank from failure of any of the facilities. Therefore, similar to the proposed Project, potential impacts associated with flooding from a seismically induced seiche would not be significant under the Increased Growth Alternative. Since Burbank is located over 15 miles inland from the Pacific Ocean, tsunamis are not considered a hazard for the Specific Plan Area. Additionally, future development projects under the Increased Growth Alternative would include residential and commercial uses, which are considered to be low risk regarding the storage or use of significant quantities of hazardous

materials, similar to the proposed Project. Therefore, risks related to the release of hazardous materials due to inundation are minimal, and impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Obstruction of a Water Quality Control Plan or Sustainable Groundwater Management Plan

Similar to the proposed Project and as described above, groundwater use by future development projects under the Increased Growth Alternative are not anticipated to cause significant impacts to groundwater levels because the San Fernando Basin is determined to be a 'very low' priority basin by DWR under SGMA, is not in overdraft, and is utilized by numerous water agencies as only a part of the supply mix for the area. There is no GSA with jurisdiction over the San Fernando Basin and thus, no GSP is in place. Therefore, there is no sustainable groundwater management plan, which addresses groundwater underlain by or used by the Specific Plan Area, and groundwater from other basins is not expected to be utilized by projects carried out under the Increased Growth Alternative because existing supply is more than adequate. Therefore, the Increased Growth Alternative would not conflict with or obstruct a sustainable groundwater management plan and impacts would be less than significant, and **similar to** the proposed Project. (*Similar impact*)

i. Land Use/Planning

Division of an Established Community

Similar to the proposed Project, implementation of the Increased Growth Alternative would prioritize future development projects on infill sites in already developed areas of the Specific Plan Area. Since the Specific Plan Area is built out, if new roads are required for future development projects under the Increased Growth Alternative, they would either be short public roads to facilitate access to a site or private streets within a proposed development project. Therefore, future development projects under the Increased Growth Alternative are not anticipated to involve the construction of new roads, railroads, or other features that may physically divide established communities in the Specific Plan Area, similar to the proposed Project. No impact would occur, **similar to** the proposed Project. (*Similar impact*)

Conflict with Land Use Plan, Policy, or Regulation

As shown in Table 6-6, the Increased Growth Alternative would result in more development in the Specific Plan Area. Similar to the proposed Project, approval of the Increased Growth Alternative would include a General Plan Amendment to amend the land use designations in the Land Use Element, adoption of the Specific Plan, and a corresponding zoning text amendment to be consistent with the General Plan. The Increased Growth Alternative, similar to the proposed Project, would be consistent with the 2024-2050 SCAG RTP/SCS and BMC but would be inconsistent with the Burbank2035 General Plan policies regarding air quality and wastewater. As described in Section 6.2.2(b) above, the Increased Growth Alternative's impacts related to short-term and long-term SCAQMD regional thresholds would remain significant and unavoidable, and similar to the proposed Project. Thus, the Increased Growth Alternative's inconsistency with the Burbank2035 General Plan policies regarding air quality. Additional development resulting from the Increased Growth Alternative would have an even greater impact related to wastewater treatment capacity, as described below under Section 6.2.2(p). Although similar mitigation measures as identified in the proposed Project would be applied to the Increased Growth Alternative, implementation of necessary

upgrades to the wastewater treatment system would not be completed within the Increased Growth Alternative planning horizon. Thus, impacts related to a conflict with land use plans, policies, or regulations would be significant and unavoidable but **greater** than the proposed Project due to a greater wastewater capacity impact. (*Greater impact*)

j. Noise

Construction Noise

As shown in Table 6-6, the Increased Growth Alternative would result in an increase in density at the same potential development sites as the proposed Project. Future construction activity associated with development within the Specific Plan Area under the Increased Growth Alternative scenario would require the use of a variety of noise-generating equipment that would result in temporary increases in ambient noise levels on an intermittent basis. Similar to noise generated by development under the proposed Project scenario, noise levels produced by construction under the Increased Growth Alternative would vary depending on the construction phase and types of equipment used, the durations of use, distance between the noise source and surrounding receptors, and presence or absence of noise-attenuation barriers.

Sensitive receptors are located throughout the Specific Plan Area and could be exposed to noise associated with construction activities from future development under implementation of this alternative. Because specific development projects have not yet been determined at individual sites, this analysis assumes that construction activities would likely occur within 50 feet of sensitive receptors throughout the course of a typical construction day. Because the Increased Growth Alternative would result in a substantially higher net increase in development compared to the proposed Project scenario (148 percent more residential units and 182 percent more non-residential square footage), construction durations would likely also increase. While the Increased Growth Alternative may result in increased exposure of sensitive receptors to construction noise (based on greater net development and increased overall construction durations), individual projects under this alternative are expected to utilize similar equipment types and would consist of similar activities; therefore, the maximum noise levels resulting from construction would be similar to the proposed Project. Based on the construction noise analysis completed for the proposed Project (Section 4.11, *Noise*), a construction of a typical project is expected to generate noise levels up to 84 dBA L_{eq} (8-hour) at 50 feet away, potentially exceeding the daytime significance threshold of 80 dBA L_{eq} (8-hour) at residential land uses.

Compliance with Section 9-1-1-105.10 of the BMC would restrict the timing of construction activities to the hours of 7:00 a.m. to 7:00 p.m., Mondays through Fridays, and 8:00 a.m. and 5:00 p.m. on Saturdays. No construction would be permitted on Sundays or City holidays. In addition, implementation of and adherence to the following existing policies in the Burbank2035 General Plan Noise Element would ensure continued application of the City's existing timing restrictions on construction activity, or modification of those standard restrictions as necessary to protect noise-sensitive receptors. Similar to the proposed Project, development under the Increased Growth Alternative would be required to comply with the following Burbank2035 General Plan Noise Element policies:

- **Policy 7.1**: Avoid scheduling City maintenance and construction projects during evening, nighttime, and early morning hours.
- **Policy 7.2**: Require project applicants and contractors to minimize noise in construction activities and maintenance operations.

- **Policy 7.3**: Limit the allowable hours of construction activities and maintenance operations located adjacent to noise-sensitive land uses.

Implementation of Policies 7.1 through 7.3 would reduce construction noise impacts associated with future development projects under the Increased Growth Alternative scenario. However, project-level details are not currently available for future development projects under the Increased Growth Alternative scenario. Therefore, it is not possible to determine exact noise levels, locations, or time periods for construction of such projects, or construction noise at adjacent properties. Construction noise levels associated with future development projects under the Increased Growth Alternative scenario may exceed the Federal Transit Administration's (FTA) daytime construction noise limits; therefore, temporary noise impacts associated with construction of development projects under the Increased Growth Alternative scenario would be potentially significant, and mitigation would be required. The Increased Growth Alternative would implement Mitigation Measures NOI-1a through NOI-1j, as identified for the proposed Project, as well as implementation of goals and policies from the Burbank2035 General Plan, which would reduce potential noise impacts during construction activities.. Although implementation of Mitigation Measures NOI-1a through NOI-1j would reduce construction noise impacts, it cannot be guaranteed that construction noise impacts would be reduced to below the daytime significance threshold of 80 dBA L_{eq} (8-hour) at residential uses and other sensitive receptors in all cases. Therefore, construction noise impacts associated with development projects under the Increased Growth Alternative would be significant and unavoidable and **similar to** the proposed Project. (*Similar impact*)

Operational Noise

Stationary Noise

Based on manufacturer's specifications, a Carrier 38HDR060 split system air conditioner with a sound power level of 72 dBA would generate a noise level of approximately 57 dBA at a distance of seven feet. As detailed in Section 4.11, *Noise*, of this EIR, the ambient base noise level in Burbank is 55 dBA during the daytime and 45 dBA during the nighttime for residential-zoned areas. Therefore, in the case where actual ambient conditions are not known, noise from heating, ventilation, and air conditioning (HVAC) equipment could exceed the City's presumed ambient noise conditions when compared to a reference noise level 57 dBA at a distance of seven feet from the HVAC equipment source. However, noise levels from HVAC equipment associated with new development under the Increased Growth Alternative would be comparable to noise levels of HVAC equipment associated with the existing urban environment. Furthermore, the design and placement of new HVAC equipment would be required to comply with Section 9-3-208.A of the BMC, which prohibits noise from any machinery, equipment, pump, fan, air conditioning apparatus from exceeding the ambient noise levels of adjacent noise-sensitive properties by more than 5 dBA. Additionally, onsite equipment would be typically designed such that it would be shielded by sound barriers that block the line-of-sight to sensitive receptors or would include installation of appropriate noise-muffling devices to reduce noise. Therefore, operational noise impacts associated with on-site sources (such as HVAC equipment) would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Traffic Noise

Implementation of the Increased Growth Alternative would allow additional buildout of residential and non-residential land uses, which would generate new vehicle trips that could incrementally increase the exposure of land uses along roadways to traffic noise generated by future development

projects under the Increased Growth Alternative. According to the Technical Review of Modeling and VMT Methodology for Media District Specific Plan Traffic Study Report prepared for the proposed Project, the Increased Growth Alternative would produce 51,264 daily vehicle trips, which would be an increase from the proposed Project's anticipated 39,960 daily vehicle trips (Appendix D). Following the methodology discussed in Section 4.11, *Noise*, traffic noise increases associated with the Increased Growth Alternative scenario were estimated for roadways within the Specific Plan Area. Table 6-9 presents a summary of segment volumes and associated noise increases on roadways within the Specific Plan Area under the Increased Growth Alternative.

Table 6-9 Traffic Volumes and Associated Noise Increases (Increased Growth Alternative Scenario)

		Existing	Increased Growth Alternative	
Roadway	Segment	PM Peak Hour Traffic Volume	PM Peak Hour Traffic Volume	Noise Increase (dBA CNEL)
N Hollywood Way	Between Magnolia Blvd and W Verdugo Ave	1,084	1,251	0.6
	Between W Verdugo Ave and W Oak St	991	1,230	0.9
	Between W Oak St and W Alameda Ave	1,034	1,305	1.0
	Between W Alameda Ave and W Riverside Dr	736	1,100	1.7
	Between W Riverside Dr and W Olive Ave	420	784	2.7
W Riverside Dr	Between N Clybourn Ave and Evergreen St/W Alameda Ave	915	1,056	0.6
	Between Evergreen St/W Alameda Ave and N Pass Ave	356	330	-0.3
	Between N Pass Ave and N Screenland Dr/SR-134 EB On-Ramp	363	272	-1.3
	Between N Screenland Dr/SR-134 EB On-Ramp and N Hollywood Way	432	483	0.5
	Between N Hollywood Way and W Olive Ave	411	372	-0.4
	Between W Olive Ave and S California St	476	483	0.1
	Between S California St and Bob Hope Dr	375	467	1.0
	Between Bob Hope Dr and S Buena Vista St	761	912	0.8
W Alameda Ave	Between Evergreen St/W Riverside Dr and N Pass Ave	629	782	0.9
	Between N Pass Ave and N Hollywood Way	1,010	1,259	1.0
	Between N Hollywood Way and SR-134 WB Ramps	1,090	1,225	0.5
	Between SR-134 WB Ramps and Lima St	830	992	0.8
	Between Lima St and W Olive Ave	819	1,096	1.3
	Between W Olive Ave and Bob Hope Dr	691	872	1.0
	Between Bob Hope Dr and S Buena Vista St	877	1,113	1.0
N Pass Ave	Between W Verdugo Ave and W Oak St	434	537	0.9
	Between W Oak St and SR-134 EB Off-Ramp	561	627	0.5
	Between SR-134 EB Off-Ramp and W Alameda Ave	663	742	0.5
	Between W Alameda Ave and W Riverside Dr	351	354	<0.1
	Between W Riverside Dr and W Olive Ave	353	401	0.5

Roadway	Segment	Existing	Increased Growth Alternative	
		PM Peak Hour Traffic Volume	PM Peak Hour Traffic Volume	Noise Increase (dBA CNEL)
Barham Blvd/W Olive Ave	Between Lakeside Plaza Dr/Forest Lawn Dr and Lakeside Dr	1,434	1,552	0.3
W Olive Ave	Between Lakeside Dr and N Pass Ave	1,570	1,642	0.2
	Between N Pass Ave and N Hollywood Way	1,258	1,298	0.1
	Between N Hollywood Way and W Riverside Dr	649	616	-0.2
	Between W Riverside Dr and Lima St	885	951	0.3
	Between Lima St and S California St	856	930	0.4
	Between S California St and W Alameda Ave	888	1,052	0.7
	Between W Alameda Ave and Buena Vista St	943	1,118	0.7
	Between Buena Vista St and Sparks St	901	1,043	0.6
W Verdugo Ave	Between N Clybourn Ave and N Pass Ave	505	572	0.5
	Between N Pass Ave and N Hollywood Way	702	786	0.5
	Between N Hollywood Way and N Buena Vista St	649	692	0.3
	Between N Buena Vista St and W Olive Ave	489	524	0.3
Buena Vista St	Between Magnolia Blvd and W Verdugo Ave	789	916	0.6
	Between W Verdugo Ave and W Olive Ave	931	1,121	0.8
	Between W Olive Ave and W Alameda Ave	718	832	0.6
	Between W Alameda Ave and W Riverside Dr	675	766	0.5
Bob Hope Dr	Between W Alameda Ave and Parkside Ave	381	505	1.2
	Between Parkside Ave and SR-134 EB Off-Ramp	382	464	0.8
	Between SR-134 EB Off-Ramp and W Riverside Dr	434	518	0.8
Lima St	Between W Alameda Ave and W Olive Ave	153	308	3.0
Oak St	Between N Pass Ave and N Hollywood Way	158	268	2.3

dBA = A-weighted decibel; CNEL = Community Noise Equivalent Level
Source: Fehr & Peers 2025.

As shown in Table 6-9, traffic volumes associated with the Increased Growth Alternative scenario would not result in noise increases above 3.0 dBA CNEL on any roadways within the Specific Plan Area. Traffic noise increases would, therefore, not exceed the City's traffic noise increase thresholds of 5 dBA CNEL/L_{dn} (for ambient noise levels below 60 dBA CNEL/L_{dn}) or 3 dBA CNEL/L_{dn} (for ambient noise levels above 60 dBA CNEL/L_{dn}). Operational noise impacts associated with off-site noise sources (i.e., traffic) resulting from development under the Increased Growth Alternative site would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Groundborne Vibration

Construction

BUILDING DAMAGE

Vibration impacts related to building damage would most commonly occur when a future development project uses equipment that generates high vibration levels (e.g., pile drivers and/or vibratory rollers) in close proximity to a historical resource constructed of fragile building materials. These historic structures are typically more sensitive to vibration damage than structures that were built using more modern building techniques and materials. The extent of vibration impacts generated during construction generally depends on the specific construction equipment utilized, the duration of equipment use, the proximity equipment is operated relative to nearby sensitive receptors, and the type of building construction/structural integrity of affected structures.

Construction vibration is a localized event and is typically only perceptible to a receptor located in close proximity to the vibration source. Construction for most developments would require heavy equipment, especially on sites where certain geologic conditions require the use of pile driving. Such heavy equipment may operate within 25 feet of nearby buildings, representing a high potential for vibration impacts. The duration of construction for individual development projects under the Increased Growth Alternative would likely be increased; however, equipment types would be similar to those expected during construction of the proposed Project and as a result, vibration impacts would be similar. Based on the vibration impact analysis completed for the proposed Project (Section 4.11, *Noise*), there is potential for certain equipment types to generate levels of vibration exceeding applicable building damage thresholds if operated within specified distances of nearby structures. Therefore, development accommodated under the Increased Growth Alternative could result in potentially significant impacts related to construction vibration related to building damage similar to the proposed Project. Implementation of Mitigation Measure NOI-2, as identified for the proposed Project, would reduce these vibration building damage impacts to the greatest extent feasible. With implementation of Mitigation Measure NOI-2, impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

HUMAN ANNOYANCE CRITERIA

In addition to potential building damage, vibration generated during construction has the potential to cause annoyance to human receptors if equipment is operated within certain proximities. Construction of individual development projects under the Increased Growth Alternative would result in increased overall construction durations; however, the equipment types expected to be used during construction would be similar to those used during proposed Project construction. Therefore, vibration impacts related to human annoyance would be similar to those resulting from the proposed Project. Based on the vibration impact analysis completed for the proposed Project (Section 4.11, *Noise*), vibration impacts related to human annoyance would vary depending on the equipment types

used and proximities between equipment and nearby sensitive receptors. If operated within certain distances of nearby sensitive receptors, most equipment types would generate vibration levels exceeding applicable human annoyance thresholds, especially if equipment is operated within 50 feet of nearby sensitive receptors. Implementation of Mitigation Measure NOI-2, as identified for the proposed Project, would reduce vibration human annoyance impacts to the greatest extent feasible. With implementation of Mitigation Measure NOI-2, impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Operation

The primary source of operational vibration introduced by development under the proposed Project would be vehicular traffic on local roadways, which may generate some level of groundborne vibration. However, according to the FTA *Transit Noise and Vibration Impact Assessment Manual* (FTA 2018) guidance document, rubber tires and suspension systems dampen vibration levels from trucks to a level that is rarely perceptible. Therefore, groundborne vibration resulting from an increased number of vehicles associated with new development under the Increased Growth Alternative would generally not be perceptible by sensitive receptors, and impacts related to operational groundborne vibration would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Public Airports

As described in Section 4.11, *Noise*, the Specific Plan Area is not within or near any Airport Influence Area defined by the Los Angeles County Airport Land Use Plan, including the Hollywood Burbank Airport (Los Angeles County Airport Land Use Commission 2004). Because the Specific Plan Area is not located within any airport's Airport Influence Area or the 65 CNEL or higher noise contours, future development projects under the Increased Growth Alternative would not expose people residing or working in the Specific Plan Area to excessive noise levels. As such, no impact would occur, **similar to** the proposed Project. (*Similar impact*)

k. Population and Housing

Unplanned Growth

As shown in Table 6-6, the Increased Growth Alternative would result in more development in the Specific Plan Area. Using the DOF persons per household ratio of 2.38, this alternative would result in an estimated population increase of 34,063 people (2.38 x 14,312 units). This would bring the population of Burbank from 105,603 to 139,666. At the City level, population forecasts are not provided by SCAG, so the following analysis focuses on the potential impacts associated with growth in housing and employment in the Specific Plan Area.

Housing

As detailed in Section 4.12, *Population and Housing*, of this EIR, the anticipated number of housing units under the Burbank 2021-2029 Housing Element is 10,011 units to accommodate the City's forecasted population growth under the Downtown TOD Specific Plan and GSSP, which contain the Housing Element opportunity sites. However, the estimated growth under the analysis for the Housing Element EIR was changed to 10,456 units to account for the 2029 interpolated housing growth assumed under the two Specific Plans along with the City's RHNA allocation. The addition of these units results in a total City-wide residential count of 55,525 units. As such, the 14,312 residential units under the Increased Growth Alternative are not included in the City's current Housing Element.

Under the Burbank2035 Land Use Element, the established Citywide cap on the number of housing units is 61,647 units. This total of 61,647 units, minus the 55,525 units accounted for under the 2021-2029 Housing Element, allows for 6,122 units of growth that is not accounted for in the 2021-2029 Housing Element. Therefore, the addition of 14,312 units under the Increased Growth Alternative would exceed the City's estimated growth under the Housing Element. This exceedance of 8,190 housing units is a greater exceedance than the proposed Project and, thus, would result in a greater impact.

As shown in Table 4.12-2 in Section 4.12, *Population and Housing*, SCAG forecasts 48,600 housing units in Burbank in 2035 and as shown in Table 6-10, implementation of the Increased Growth Alternative would result in 60,769 total housing units in Burbank. Therefore, the Increased Growth Alternative would exceed SCAG's 2035 housing forecast by 12,169 units, which is a greater exceedance than the proposed Project and, thus, a greater impact.

Table 6-10 Population and Housing Growth Under the Increased Growth Alternative

	City of Burbank	Los Angeles County
Population		
Existing (2024)	105,603	9,824,091
Increased Growth Alternative	34,063	34,063
New Total	**139,666**	**9,858,154**
Percent Increase	32.2%	0.35%
Housing		
Existing (2024)	46,457	3,696,408
Increased Growth Alternative	14,312	14,312
New Total	**60,769**	**3,710,720**
Percent Increase	30.8%	0.39%

Source: DOF 2024

Although development under the Increased Growth Alternative would exceed the City's and SCAG's estimated housing growth, the City's overall vision for the Specific Plan Area is to address current issues, such as housing supply and affordability, transportation infrastructure, and safety, by encouraging contextual transit-oriented development in the center of the Specific Plan Area around existing and future transit opportunities. The Increased Growth Alternative would support this vision through the introduction of increased development on the opportunity sites identified for the proposed Project, which are located near the center of the Specific Plan Area around existing and future transit opportunities. In addition, the Increased Growth Alternative would guide land use and development decisions through the objective design standards and implementation strategies. Therefore, future development under the Increased Growth Alternative would not result in unplanned population and housing growth. Impacts would be less than significant but **greater than** the proposed Project. (*Greater impact*)

Employment

Development under the Increased Growth Alternative would result in up to 7,265,850 square feet of non-residential uses and would result in approximately 14,219 new jobs, as shown in Table 6-11.

Table 6-11 Estimated Employment Associated with the Increased Growth Alternative

Land Use	Build Out Square Footage	Square Feet per Employee[1]	Total New Employees
Retail	7,265,850	511	14,219

[1] Source: SCAG 2001 (Table 4B); the factor used for commercial space is the average of the factors for "Other Retail/Services" and "Low-Rise Office."

As shown in Table 4.12-2, in Section 4.12, *Population and Housing*, SCAG forecasts approximately 144,600 jobs in Burbank in 2035, and as shown in Table 6-11, implementation of the Increased Growth Alternative would result in 14,219 new jobs in Burbank, which would increase the total jobs in Burbank from 127,800 to 142,019 jobs. Therefore, the Increased Growth Alternative would be within the SCAG employment forecast and employment impacts would be **similar to** the proposed Project. (*Similar impact*)

Displacement of Housing

Future development projects under the Increased Growth Alternative would involve new residential, hotel, and commercial uses on infill sites, which could potentially result in the displacement of some existing housing units and residents. However, goals, policies, and objectives included in the Increased Growth Alternative would aim to prevent displacement and promote housing stability and would increase opportunities for housing by rezoning areas for higher density development. Additionally, it is anticipated that any replacement housing need created by displacement of existing housing would be offset through the implementation of the Increased Growth Alternative. Therefore, impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

I. Public Services

As shown in Table 6-6, the Increased Growth Alternative would result in an increase in density in the Specific Plan Area in comparison to the proposed Project, which would incrementally increase demand for public services, including fire protection, police protection, schools, parks, and other public facilities. The following is an analysis of the potential impacts to these resources under the Increased Growth Alternative.

Fire Protection

Increased development, density, population, and traffic resulting from implementation of the Increased Growth Alternative would increase calls for fire protection service throughout the Specific Plan Area for issues, including, but not limited to, emergency medical service, structure fires, and traffic collisions. The increase in calls for Burbank Fire Department (BFD) service directly affects the use, lifespan, and deterioration of infrastructure, facilities, and equipment. Additionally, development would increase the BFD's staffing need to fulfill their obligations for fire prevention and safety, which would include reviewing development plans to verify that development projects under the Increased Growth Alternative comply with all applicable fire codes.

General Plan Policies 4.1 through 4.7 are intended to reduce fire risk in the City by allocating resources to meet projected demands and response times, maintaining adequate fire resources in areas vulnerable to fires in VHFHSZ and dense urban areas, and coordinating firefighting efforts with other local, State, and federal agencies. BFD receives its funding through property taxes, development impact fees, fees for service, and grant funding and can fund expanded services as new development occurs. Development projects under the Increased Growth Alternative would be required to pay fire

protection development impact fees to fund additional facilities and equipment. These funds, in addition to the General Fund from property and sales tax revenues, would help pay for costs associated with the development of new fire stations, if needed, including any required project-level environmental analysis. This adherence to existing State and local regulations and payment of City fees would ensure that development associated with the Increased Growth Alternative would not adversely affect fire protection facilities or performance objectives. It is anticipated that if it becomes necessary in the future to build a new fire station or expand an existing station due to development under the Increased Growth Alternative, similar to the proposed Project, the development would be subject to CEQA review at the time a site is identified and a specific design proposed. Given the City's highly developed nature and the likelihood that a new fire station would be on an infill site, potential impacts under that infrastructure project would likely be less than significant or even exempt from CEQA review. Impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Police Protection

As described in Section 4.13, *Public Services*, of this EIR, the Burbank Police Department (BPD) provides police protection services within the City limits. BPD currently has 160 sworn officers (BPD 2026). Based on Burbank's population of 105,603 in 2024, the BPD employs approximately 1.52 officers per 1,000 residents. The introduction of 34,063 residents resulting from the Increased Growth Alternative would cause the Burbank Police Department (BPD) office/resident ratio to drop from approximately 1.52 to approximately 1.15 sworn officers per 1,000 residents.

Policies 2.1 and 2.2 in the Burbank2035 General Plan Safety Element require the BPD to ensure that there is adequate staffing, facilities, equipment, technology, and funding to meet existing services demands and maintain an average response time of four minutes to emergency calls for service. Additional demand for police service would be accommodated through the expansion of police personnel and facilities to continue to meet the BPD's service standards. To maintain the current staffing proportions for the anticipated population growth associated with the Increased Growth Alternative, BPD would require additional officers, civilian positions, vehicles, equipment, and facilities, compared to the proposed Project. Police protection service levels would continue to be evaluated and maintained by BPD in accordance with existing policies, procedures and practices as development occurs over the lifetime of the Increased Growth Alternative. Future development projects under the Increased Growth Alternative would be required to pay police protection development impact fees to help fund additional facilities and equipment. These funds, in addition to the General Fund from property and sales tax revenues, would help pay for costs associated with the development of new police stations, if needed, including any required project-level environmental analysis. This adherence to existing State and local regulations and payment of City fees would ensure that development under the Increased Growth Alternative would not adversely affect police protection services and facilities or performance objectives, similar to the proposed Project. It is anticipated that if it becomes necessary in the future to build a new police station or expand an existing station due to development under the Increased Growth Alternative, similar to the proposed Project, it would be subject to CEQA review at the time a site is identified and a specific design proposed. Given the City's highly developed nature and the likelihood that a police station would be on an infill site, potential impacts under that infrastructure project would likely be less than significant or even exempt from CEQA review. Impacts would remain less than significant and **similar to** the proposed project. (*Similar impact*)

Schools

Development under the Increased Growth Alternative would not directly result in development of local schools but would generate new students entering the Burbank Unified School District (BUSD). Implementation of the Increased Growth Alternative would add an estimated 34,063 residents, and some of those residents would be school-aged children. Based on student generation rates for the BUSD, the Increased Growth Alternative could generate an estimated 3,220 students, which may result in the following distribution between grades K-12: 1,324 elementary school students (grades K-5); 773 middle school students (grade 6-8); and 1,123 high school students (grades 9-12).[7] The schools that would serve the Specific Plan Area are Robert Louis Stevenson Elementary School, Dolores Huerta Middle School, and Burroughs High School. As detailed in Section 4.13, *Public Services*, BUSD has a remaining enrollment capacity of 1,550 students as of school years 2020 and 2021. Therefore, BUSD would not adequately accommodate the 3,220 additional students assumed as part of the Increased Growth Alternative. However, to offset a project's potential impact to schools, California Education Code 17620 establishes the base amount of allowable developer fees a school district can collect from development projects located within its boundaries. The fees obtained by BUSD are used to maintain the desired school capacity and the maintenance and/or development of new school facilities. Development projects under the Increased Growth Alternative would be subject to these State-mandated school impact fees and collected at the time of building permit issuance. Pursuant to Section 65995(h) of the California Government Code, the payment of statutory fees is "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization as defined in Section 56021 or 56073, on the provision of adequate school facilities."

Additionally based on information provided by BUSD in 2020, BUSD utilizes inter-district permits to keep overall enrollment and average daily attendance numbers at levels sufficient to maintain the level of funding necessary for ongoing operations of schools, including staffing, supplies, and programming (BUSD 2020). Between 2021 and 2023, BUSD's resident-based enrollment decreased by approximately two percent (a decrease of 270 students); during the same period, there was an increase in the number of inter-district permits that BUSD issued to address the decrease and sustain necessary average daily attendance (California Department of Education 2023). BUSD would continue to evaluate demand, capacity, and plans for facility needs as future development projects under the Increased Growth Alternative are built out, including any required decreases to the number of inter-district permits relative to new student population generated from additional housing development in the City.

There are no planned improvements to add capacity through expansion. To accommodate additional students from new housing development(s), BUSD would place students at other BUSD schools in the event their home school enrollment was at capacity (Kukta 2021). It is important to note that student daily attendance has a direct effect on State funds in the form of "average daily attendance numbers." The average daily attendance for individual schools and the district as a whole can affect the availability of State money received to help fund daily operations that include school staffing needs. In the event that BUSD constructs a new school or physically alters an existing facility, a project-specific environmental analysis would be required under CEQA to address site-specific environmental concerns. As described above, existing laws and regulations would require funding for the provision

[7] Generation rates based on the 2022 Burbank Unified School District (BUSD) School Fee Justification Study. Generation rates for multi-family residential units include: 0.0925 for elementary school students (grades K-5), 0.0540 for middle school students (grades 6-8), and 0.0748 for high school students (grades 9-12).

or expansion of new school facilities to offset impacts from new residential development, and impacts would remain less than significant and **similar to** the proposed project. (*Similar impact*)

Parks

The City contains 26 parks that total approximately 732 acres of parkland. Stough Canyon Park and Wildwood Canyon Park are the two largest parks in the City. They each serve as recreational and cultural focal points for the community at large. General Plan Open Space and Conservation Element Policy 2.3 establishes a minimum level of three acres per 1,000 persons, with a goal of five acres per 1,000 persons. Implementation of the Increased Growth Alternative would add an estimated 34,063 residents to the City, increasing Burbank's population from 105,603 residents to approximately 139,666 residents and would decrease the existing parkland ratio of 6.9 acres per 1,000 residents to 5.2 acres per 1,000 residents. However, service ratios would still be above the General Plan goal of five acres per 1,000 persons. Therefore, the Increased Growth Alternative would maintain the General Plan service ratio.

The following policies and programs from the Burbank2035 General Plan Land Use Element and programs from the Open Space and Conservation Element and Land Use Element would require that adequate parks and recreational facilities are provided to accommodate the anticipated increase in new residents:

- Policy 2.2 establishes a standard to provide a community or neighborhood park within 0.5-mile of all residences in the City.
- Policy 2.4 encourages the City to provide additional types of park facilities such as pocket parks, dog parks, athletic fields, amphitheaters, gardens, and shared facilities.
- Policies 3.1 through 3.6 provide specific guidance to the City to maintain existing parks and recreation facilities by rehabilitating facilities, installing improvements (e.g., field lighting).
- Program OSC-2 requires the development of a Park, Recreation, and Community Services Master Plan, which would direct long-term acquisition, operation, management, and programming for parks, open spaces, and recreation facilities. The Master Plan is intended to guide the in-lieu fee structure for the acquisition and management of recreation land in connection with the development review process.
- Program LU-8 requires review and compliance with the community facilities fee program to ensure that new development adequately offsets impacts related to recreational facilities.

Developers of the residential development projects associated with the Increased Growth Alternative would also be required to pay the City's park facility development fee as required by BMC Section 9-4-1-1103.

These policies and programs are intended to maintain existing levels of service for park and recreation facilities for both existing and new residents. Increased demand associated with an increase in population would require development to pay the applicable park facility development fees that support the construction of new parks or the expansion of existing parks. Therefore, impacts associated with the provision of new or physically altered parks or the need for new or physically altered parks would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Other Public Facilities

Development under the Increased Growth Alternative would not directly result in development of public facilities, such as libraries, but would generate new visitors to local libraries.

As discussed in Section 4.13, *Public Services*, when compared to other libraries in similar communities as Burbank (Glendale, Pasadena, Santa Monica, Thousand Oaks, Torrance), the Burbank Public Library is low on space (ranks 5 of 6 at 0.74 square feet per capita) and is moderately well-staffed (ranks 3 of 6 at 0.60 full time equivalent staff per 1,000 population, slightly ahead of Thousand Oaks and Torrance). Given that not all new residents would visit the library every month, it is unlikely that expansion or construction of new library facilities would be required to accommodate for the increase in population resulting from implementation of the Increased Growth Alternative.

Additionally, Program LU-8 in the Burbank2035 General Plan provides development impact fees for libraries. Potential public facilities impacts from development would be offset by payment of development impact fees in addition to property taxes and sales taxes to the City. Furthermore, potential environmental impacts related to the construction of new or expanded library facilities would be assessed on a project-specific level under CEQA. Therefore, impacts associated with the provision of new or physically altered public facilities or the need for new or physically altered public facilities would be less than significant and **similar to** the proposed Project. (*Similar impact*)

m. Recreation

Accelerated Physical Deterioration of Recreational Facilities

As identified in the Burbank2035 General Plan, the City contains 26 parks that total approximately 732 acres of parkland. Stough Canyon Park and Wildwood Canyon Park are the two largest parks in the City. They each serve as recreational and cultural focal points for the community at large. Implementation of the Increased Growth Alternative would add an estimated 34,063 residents to the City, increasing Burbank's population from 105,603 residents to approximately 139,666 residents and would decrease the existing parkland ratio of 6.9 acres per 1,000 residents to 5.2 acres per 1,000 residents. However, service ratios would still be above the General Plan goal of five acres per 1,000 persons. In addition, the Burbank 2035 General Plan *Open Space and Conservation Element* establishes a requirement of three acres of new parkland per 1,000 new residents. This requirement applies to large residential developments and would result in parkland dedications, improvements, or in-lieu payments if a project applicant is not able to dedicate land or the land is considered unsuitable for park or recreation use.

Further, the Burbank2035 General Plan Open Space and Conservation Element and Land Use Element include policies and programs that would require that adequate parks and recreational facilities are provided to accommodate the anticipated increase in new residents (refer to the *Parks* discussion on the preceding page).

These policies and programs are intended to maintain existing levels of service for park and recreation facilities for both existing and new residents. Increased demand associated with a corresponding increase in population may result in the physical deterioration of parks within the Specific Plan Area or in the vicinity; however, development under the Increased Growth Alternative would be required to pay the applicable park facility development fees pursuant to BMC Sections 9-4-1-1103, 9-4-1-1104, and 10-1-2227, similar to the proposed Project. Payment of impact fees and the anticipated enhancement or maintenance of facilities with funds provided by these fees would help offset the deterioration of existing recreation facilities by providing funds for facility improvements and

replacement of deteriorating equipment. Compliance with the Burbank2035 General Plan policies and programs and payment of park facility development fees as required by the BMC would ensure that the Increased Growth Alternative's potential impacts related to the deterioration of existing recreation facilities would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Requirement of the Construction or Expansion of Recreational Facilities

As described above, the anticipated population increase associated with the Increased Growth Alternative would decrease the existing parkland ratio of 6.9 acres per 1,000 residents to 5.2 acres per 1,000 residents. This ratio is a decrease from the current ratio; however, it would still meet the City's goal of five acres of parkland per 1,000 residents. BMC regulations and the Burbank2035 General Plan policies and programs described above, are intended to maintain existing levels of service for park and recreation facilities for both existing and new residents. Increased demand associated with a corresponding increase in population would not require construction of new or expanded parks and recreation facilities because development would be required to pay the applicable park facility development fees, which would fund future development of new or expanded parks and recreation facilities. While impact fees are required for developers to support the addition of recreational facilities such as parks, the Increased Growth Alternative would not directly introduce or expand existing recreational facilities that would affect the environment. Therefore, impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

n. Transportation

Consistency with Programs, Plans, or Policies Addressing the Circulation System

As shown in Table 6-6, the Increased Growth Alternative would result in an increase in density in comparison to development under the proposed Project. Due to the increased demand for transportation infrastructure from future development under the Increased Growth Alternative, the Increased Growth Alternative would include several policies that encourage multi-modal transportation and improve safety features for pedestrians, which are identified for the proposed Project and described in Section 4.19, *Effects Found Not to be Significant,* of this EIR. These policies align with the Burbank2035 Mobility Element, which requires the City to improve Burbank's alternative transportation access to local and regional destinations through land use decisions that support multi-modal transportation. Therefore, conflicts with existing policies or ordinances related to the City's circulation system would not be anticipated, and impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Consistency CEQA Guidelines Section 15064.3(b)

As shown in Table 6-6, the Increased Growth Alternative would result in an increase in density in comparison to development under the proposed Project. Development under the Increased Growth Alternative would be facilitated through a combination of infill, mixed-use development, and transit-oriented growth strategies. These include identifying underutilized parcels as opportunity sites, concentrating development along transit corridors, and improving pedestrian, bicycle, and non-vehicular infrastructure.

To evaluate potential VMT impacts under *CEQA Guidelines* Section 15064.3(b), the Increased Growth Alternative was assessed using three performance metrics: (1) home-based VMT per capita, (2) home-

based work VMT per employee, and (3) total VMT per service population. Each metric is compared to a threshold requiring a 15 percent reduction below existing (2023) baseline VMT levels.

The VMT modeling provides estimates for the population, employment, and service population in the Specific Plan Area in 2035.[8] Under the Increased Growth Alternative, the Specific Plan Area population in 2035 is estimated to be 43,200, which is estimated to produce 51,264 daily vehicle trips and 436,231 daily VMT, with an average of 10.1 home-based VMT per capita. The 79,164 future employees under the VMT model in the Specific Plan Area are estimated to attract 89,723 daily vehicle trips and 970,088 daily VMT, with an average of 12.3 home-based work VMT per employee. The total 122,364 service population under the VMT model in the Specific Plan Area is estimated to generate 297,058 daily vehicle trips and 2,537,251 daily VMT, with an average of 20.7 total VMT per service population.

As summarized in Table 6-12, the Increased Growth Alternative would reduce total VMT per service population by 33.0 percent and home-based VMT per capita by 31.3 percent, which both would exceed the required 15-percent reduction threshold. However, it would only reduce home-based work VMT per employee by 8.4 percent, which falls short of the 15-percent target.

Table 6-12 Increased Growth Alternative VMT Summary

Metric	2023 Baseline	Increased Growth Alternative	Percent Difference
Total Daily VMT per Service Population	31.0	20.7	-33.0%
Home-Based Daily VMT per Capita	14.7	10.1	-31.3%
Home-Based Work Daily VMT per Employee	13.4	12.3	-8.4%

Source: Fehr & Peers, 2025

Although the Increased Growth Alternative would fail to meet the 15-percent reduction target for home-based work VMT per employee, the total daily VMT per service population, home-based daily VMT per capita, and home-based work daily VMT per employee generated by the Increased Growth Alternative would have a slightly greater reduction (less than one percent difference) in VMT than the proposed Project, thus a slightly lesser impact.

While the Increased Growth Alternative promotes infill development, multimodal access, and proximity to existing and future transit infrastructure -- all of which are consistent with best practices for VMT reduction -- these measures are not sufficient to achieve a significant enough reduction in home-based work VMT per employee. This shortfall likely reflects the regional commuting patterns and land use mix in the Specific Plan Area, where job density outpaces housing development despite efforts to streamline residential production. As such, the Increased Growth Alternative would not fully meet CEQA's threshold of significance for VMT and would, therefore, result in a significant and unavoidable impact but **less** than the proposed Project. (*Less impact*)

Increased Hazards due to a Geometric Design Feature

Similar to the proposed Project, development under the Increased Growth Alternative would be consistent with the existing residential and non-residential land uses, while aiming to achieve the three overarching goals identified by the community, which include increased housing production,

[8] As discussed in the Technical Review of Modeling and VMT Methodology for Media District Specific Plan Traffic Study Report prepared for the proposed Project (Appendix D), the VMT analysis used the City's travel demand model, which has a 2023 base year and 2035 horizon year. The incremental growth assumptions shown in the VMT analysis can differ from the growth assumptions shown elsewhere in this EIR due to the inclusion of other cumulative growth within the Specific Plan Area.

transit-oriented growth, and contextual development. The Increased Growth Alternative would encourage building designs that are human scaled, provide interest at the ground floor, and provide easy access from the sidewalk to encourage walkability and activate the Specific Plan Area's public realm. Therefore, the Increased Growth Alternative would not introduce new uses that would result in hazards due to incompatible use, similar to the proposed Project. The roadways adjacent to the Specific Plan Area are part of the urban roadway network and contain no sharp curves or dangerous intersections. Nonetheless, the Increased Growth Alternative would allow for roadway improvements for vehicles and pedestrians, which could introduce hazards and conflicts between pedestrians and vehicles during construction, similar to the proposed Project. There are no planned bike lanes within the Specific Plan Area, so conflicts between vehicles and bicyclists would not be anticipated. Therefore, impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Inadequate Emergency Access

Similar to the proposed Project, the Increased Growth Alternative would improve connectivity and mobility throughout the Specific Plan Area through implementation of policies and actions, including policies directly or indirectly related to emergency access, which are identified for the proposed Project, as described in Section 4.19, *Effects Found Not to be Significant.* These policies and the improved connectivity and mobility the policies would help create would contribute to improving emergency access throughout the Specific Plan Area. In addition, emergency access associated with future development projects under the Increased Growth Alternative would be analyzed and evaluated in detail through the City review process for those individual projects. The City's emergency access standards would apply to all future development projects under the Increased Growth Alternative, similar to the proposed Project. Plans for future development projects under the Increased Growth Alternative would also be subject to the BFD review for adequate fire access. Therefore, with respect to inadequate emergency access, impacts related to implementation of the Increased Growth Alternative would be less than significant and **similar to** the proposed Project. (*Similar impact*)

o. Tribal Cultural Resources

As shown in Table 6-6, the Increased Growth Alternative would result in increased density at the same potential development sites and would involve similar amounts of ground disturbance in comparison to the proposed Project, which could adversely affect unidentified subsurface archaeological resources that may qualify as tribal cultural resources during construction. Development under the Increased Growth Alternative would comply with the City's Historic Preservation Regulations and the Burbank2035 General Plan Program LU-4: Historic Preservation Plan. However, the City's regulations do not in all cases prevent impacts to tribal cultural resources. Thus, the Increased Growth Alternative would implement Mitigation Measure TCR-1, as identified for the proposed Project, which provides disposition and treatment standards for the inadvertent discovery of tribal cultural resources. The Increased Growth Alternative would also implement Mitigation Measures CUL-2(a) and CUL-2(b), as identified for the proposed Project. Adherence to the City's regulations and Mitigation Measures TCR-1, CUL-2(a), and CUL-2(b) would reduce potential impacts related to tribal cultural resources to a less-than-significant level and **similar to** the proposed Project. (*Similar impact*)

p. Utilities/Service Systems

As shown in Table 6-6, the Increased Growth Alternative would result in an increase in density in comparison to development under the proposed Project and would incrementally increase demand for utilities and facilities, including water, wastewater, stormwater, natural gas, electricity, telecommunications, and solid waste. The following is an analysis of the potential impacts to utilities and service systems under the Increased Growth Alternative.

Water Facilities

Similar to the proposed Project, construction activities associated with future development under the Increased Growth Alternative would require recycled water for dust suppression, concrete manufacturing, and such activities as washing wheels and equipment. Temporary construction recycled water would be trucked to active construction sites or produced from existing fire hydrants near the applicable site(s), with City approval. Temporary construction water demands would not require new connections or conveyance facilities, as existing or mobile facilities would be used.

New water supply connections and associated facilities would be required for future development projects under the Increased Growth Alternative to convey potable water supply to future development. Such upgrades would occur within existing and new utility easements and would be located underground, primarily within existing roadways. Similar to the proposed Project, housing development under the Increased Growth Alternative would be located in previously developed areas that are either currently zoned for residential development or would be rezoned for residential development under this alternative. Similarly, commercial and hotel development under the Increased Growth Alternative would be located in previously developed areas that are either currently zoned for commercial or hotel development, respectively, or would be rezoned for commercial or hotel development under the Increased Growth Alternative. Due to the built-up nature of the Specific Plan Area, there are substantial existing utility easements previously established, largely within existing roadways, which are prevalent. New water service connections that may be required for development associated with the Increased Growth Alternative would be conducted within previously disturbed areas and existing rights-of-way and would be consistent with utility expansion in urbanized areas, such that minimal areas of new disturbance would occur. Although all parcels in the Specific Plan Area have access to public utility infrastructure, in some cases, the infrastructure is older and in need of replacement or insufficient to meet the needs of a particular project. Pursuant to Burbank2035 General Plan Land Use Policy 2.3, new development would be required to pay for their fair share of upgrading the utility infrastructure as needed to serve their project. This may include installing larger water mains, new water meters, and/or upgrades to existing facilities.

Developers are responsible for funding any infrastructure improvements that are required to mitigate project impacts and that have not been previously identified as part of a capital improvement program covered by the development impact fees. Consistent with applicable State law, the City's development fees would ensure that the developers pay the cost attributable to the increased demand for the affected public facilities reasonably related to the development project in order to refurbish the existing facilities to maintain the existing level of service and achieve an adopted level of service that is consistent with the City's General Plan.

As development projects under the Increased Growth Alternative are proposed and considered for approval by the City, project proponents would be required to demonstrate that any identified system deficiencies reasonably related to the development project are adequately addressed by the responsible project proponent, and future upgrades are designed in accordance with the BMC and to

the satisfaction of BWP. In addition, the City requires applicants to coordinate with the Burbank Fire Department and City of Burbank Building and Safety Division to ensure that existing and planned fire hydrants provide sufficient fire flow pressure requirements. The City's issuance of building permits is contingent upon review, testing, and approval that sufficient fire flow pressure is provided for the applicable site. Due to the existing built-up nature of the City, it is reasonably anticipated that future improvements that need to be implemented to meet water supply and fire flow requirements would not disturb previously undisturbed areas and would be situated within existing utility rights-of-way, such as, but not limited to, within public roadways.

Water supply for individual developments under the Increased Growth Alternative would be provided by BWP, which purchases imported surface water supplies from the SWP and the Colorado Aqueduct via Metropolitan, as well as local groundwater supplies which are pumped by the City in accordance with groundwater credits consistent with the local Adjudication Judgment for the underlying groundwater basin. The availability and reliability of water supply for the Increased Growth Alternative is addressed below, under *Water Supply*. Potential impacts related to relocation or construction of water supply facilities would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Wastewater Facilities

Similar to the proposed Project, future development under the Increased Growth Alternative would require new connections for wastewater conveyance. Public Works is responsible for the maintenance of the City's sewer mainlines, while individual property owners are responsible for the maintenance of the sewer laterals that connect buildings to mainlines. All structures producing sewage or liquid waste in the City of Burbank must be connected to the sewer system mainline by sewer lateral lines, which require issuance of an excavation permit and a sewer connection permit from the Public Works Permit Section (City of Burbank 2026). All sewer connections are subject to an SSC. The majority of wastewater generated in the City is conveyed to the BWRP for treatment prior to discharge in accordance with an existing NPDES permit. The Increased Growth Alternative's impacts related to wastewater treatment capacity at BWRP are discussed below under *Wastewater Capacity*.

Development under the Increased Growth Alternative would occur in compliance with the requirements of BMC Title 8, Chapter 1, *Sewers*, which establishes City standards related to wastewater discharge, peak flow, and sewer capacity. New connections to the City sewer system, including the construction of new laterals connecting to the sewer mainline, would be subject to permitting approval by the Public Works Permit Section (Burbank 2021). New wastewater conveyance connections are allowed and would be the responsibility of the private property owner to connect their private sewer lateral to the City sewer main provided that the appropriate permits are obtained, and sufficient capacity exists prior to construction. Although all parcels in Burbank have access to public utility infrastructure, in some cases, the infrastructure is older and in need of replacement to meet the needs of a particular project. Pursuant to Burbank2035 General Plan Land Use Policy 2.3, new development is required to pay for their share of upgrading the utility infrastructure as needed to serve their project. Based on project-specific conditions and Burbank2035 General Plan Land Use Policy 2.3, a project-specific sewer capacity analysis would be required for individual projects under the Increased Growth Alternative to determine the applicable development fees and any physical improvements that would be needed to ensure the City's wastewater system can adequately accommodate these future development projects. Based on the results of the project-specific sewer

capacity analysis, these improvements may include, but are not limited to, installing new or larger sewer lines and/or upgrading existing facilities.

According to the Focused Sewer Capacity Analysis, the Increased Growth Alternative would result in approximately 4.5 miles of gravity mains that would require upsizing to accommodate the City's planned growth (Appendix H). The BWRP currently has limited remaining capacity with the ability to treat sewer inflows at an average rate of approximately 8.5 MGD. The Focused Sewer Capacity Analysis also determined that development under the Increased Growth Alternative would result in approximately 5.2 MGD of additional wastewater inflows to the BWRP, which would account for approximately 61 percent of the current BWRP average daily rate of 8.5 MGD. Therefore, the Increased Growth Alternative would result in additional wastewater flows that would account for the majority of the existing average daily rate of the BWRP and would exceed the existing limited remaining capacity, which would require substantial facility improvements to accommodate this additional wastewater flow. Compared to the proposed Project, this alternative would result in greater wastewater flows generated and would require a greater amount of facility improvements to accommodate the additional wastewater flow.

As described below under *Wastewater Capacity*, potential future improvements to increase the treatment capacity of the BWRP would require upgrades to the headworks, the addition of new primary clarifiers, modifications to the secondary treatment process, and expansion of the equalization basins (beyond the near-term 10-year planning horizon). Additionally, BWRP expansion would likely require the City to acquire new land to build some of these improvements due to limited space in the current BWRP property. Details of construction (i.e., timing, equipment, location of land acquisitions) of these future wastewater treatment improvements to increase the wastewater treatment capacity are not available at the time of preparation of this EIR. Implementation of Mitigation Measures UTIL-1a through UTIL-1e would address potential impacts from the Increased Growth Alternative to the City's wastewater conveyance and treatment system, however these mitigation measures would not reduce potential impacts to a level of less than significant due to the exceedance of the available wastewater treatment capacity at BWRP associated with future development under the Increased Growth Alternative. Until all capital improvements required to upgrade the City's wastewater conveyance and treatment systems are implemented, the environmental impacts of the wastewater treatment facilities improvements will remain significant and unavoidable but would be **greater than** the proposed Project. (*Greater impact*)

Stormwater

Similar to the proposed Project, future development projects under the Increased Growth Alternative would not result in a substantial increase in impervious surfaces since they would be focused in urban infill areas already largely covered with impervious surfaces. Compliance with Sections 9-3-413 and 9-3-414 of the BMC would ensure that future development projects resulting from the Increased Growth Alternative would be implemented with appropriately sized and sited stormwater conveyance facilities. In the long-term, redevelopment of properties in the Specific Plan Area is anticipated to improve the quality and reduce the amount of stormwater runoff by replacing older development with new development that incorporates low impact development (LID) methods. LID methods include features, such as stormwater detention basins and vegetated swales, that slow the velocity of surface runoff and filter some water quality constituents before the runoff percolates to the underlying groundwater system or is conveyed through the City's or Los Angeles County Flood Control District's (LACFCD) stormwater infrastructure. In accordance with the BMC, post-construction stormwater runoff from new projects must be captured and used to the maximum extent practicable,

including through the implementation of on-site BMPs for stormwater management. Therefore, similar to the proposed Project, future development projects under the Increased Growth Alternative would include site-specific stormwater drainage and conveyance facilities, and such facilities would be designed and built in accordance with the BMC and BMPs for stormwater management. Compliance with existing local regulations, BMPs, and stormwater management standards would ensure impacts related to relocation or construction of new stormwater facilities would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Natural Gas

Similar to the proposed Project, future development projects under the Increased Growth Alternative would increase the demand for natural gas and associated connections. Natural gas is provided to the Specific Plan Area by SoCalGas, which projects total gas demand to decline at an annual rate of approximately 0.7 percent per year from 2020 through 2040 due to increased energy efficiency and updated fuel substitution assumptions (SoCalGas 2024). Other factors that contribute to the downward trend are tighter standards created by revised Title 20 and 24 requirements, a decline in core commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure. Based on the 2024 *California Gas Report*, SoCalGas will meet its projected demand for natural gas resources through at least 2040, as determined by modeled forecasts (SoCalGas 2024).

Although future development projects under the Increased Growth Alternative would increase the number of natural gas connections in the Specific Plan Area, all new development would be designed for consistency with CPUC mandates for implementing energy efficiency standards and practices. In addition, as development of additional renewable energy sources for the City continues to expand, it is reasonably inferred that demand for natural gas will decrease due to increased energy efficiency and updated fuel substitution assumptions. Therefore, although natural gas connections would likely increase due to development under the Increased Growth Alternative, the per capita demand for natural gas in the City is expected to continue decreasing through compliance with CPUC mandates for energy efficiency standards and practices, and through the greater diversification of energy supplies to include a suite of renewable energy sources in addition to natural gas. Compliance with existing State regulations would ensure that impacts related to natural gas facilities would be less than significant **but greater than** the proposed Project. (*Greater impact*)

Electricity

Electricity in the Specific Plan Area is provided by BWP, which maintains a fully functional system of above-ground and underground electrical facilities, primarily found along roadways throughout the Specific Plan Area. BWP's electrical system includes high-voltage sub-transmission lines, electrical substations, distribution circuits, transformers, and revenue meters. Electricity service for future development under the Increased Growth Alternative would be provided by BWP through new future connections that would be implemented on a project-specific basis, and subject to the review and approval of BWP. New electricity service connections that may be required for future development associated with the Increased Growth Alternative would be conducted within previously disturbed areas and existing rights-of-way and would be consistent with utility expansion in urbanized areas. Project proponents would be responsible for contributing their fair share of electrical facilities upgrades, as further described below.

BWP determined that build out of the Increased Growth Alternative would demand an additional 43 MW for residential development and 45 MW for commercial development, totaling 88 MW of additional electrical demand. BWP has a limitation of 450 MW at the existing system interconnection

with LADWP. BWP may also elect to operate the 40-MW Lake Generating Unit to serve system capacity needs, bringing the potential available system capacity to 490 MW (BWP 2025). Considering BWP's all-time peak of 322 MW and the additional forecasted load growth associated with Citywide planned development of 99 MW, BWP is forecasting a new system peak of 421 MW. This would result in approximately 69 MW of remaining capacity to serve additional developments before additional interconnection capacity would be necessary. Therefore, the Increased Growth Alternative's additional electrical demand of 88 MW would account for 128 percent of BWP's remaining electrical capacity and would require substantial system interconnection capacity increase to accommodate this additional electricity demand.

Future development projects under the Increased Growth Alternative would be responsible for contributing their fair share of electrical on-site improvements, related off-site improvements, and substation capacity based on the electrical demand for the project, as required by BWP, Title 8, Chapter 2 of the BMC, and Burbank2035 Land Use Element Policy 2.3. It is anticipated that installation of distribution substations and new sub-transmission and distribution facilities would be subject to CEQA review at the time a specific design proposed. Given the City's highly developed nature and the likelihood that these facilities would be on an infill site, potential impacts under that infrastructure project would likely be less than significant or even exempt from CEQA review. Therefore, potential impacts associated with new or expanded electrical facilities would be less than significant **but greater than** the proposed Project. (*Greater impact*)

Telecommunications

The Specific Plan Area is highly urbanized with existing above- and below-ground telecommunications infrastructure. Telecommunications services are provided by ONE Burbank, AT&T, EarthLink, Spectrum, and other providers, at the discretion of current and future residents. Similar to the proposed Project, reasonably foreseeable development under the Increased Growth Alternative would increase demand for existing telecommunications in the Specific Plan Area. Individual telecommunication providers implement planned improvements throughout their service areas on an as-needed basis, which are typically limited to small-scale upgrades and new facilities in existing developed areas. Telecommunications are generally available in the City, and substantial upgrades to existing telecommunications facilities would not likely be necessary. Construction of additional telecommunications facilities or upgrades to existing facilities to meet demands from the Increased Growth Alternative would be undertaken by private telecommunication service providers in accordance with applicable federal, State, and local regulations. No restrictions on the ability to provide adequate telecommunication service are present or anticipated to occur as a result of the Increased Growth Alternative. In addition, due to the built-up conditions in the Specific Plan Area, and the nature of telecommunication upgrades being small-scale and sited within the development footprint of new projects, potential impacts associated with new or expanded telecommunications facilities would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Water Supply

UWMP Housing and Employment Projections

As shown in Table 6-6, the Increased Growth Alternative would involve the development of 14,312 residential units, 7,265,850 square feet of non-residential uses, and 400 hotel rooms. Table 4.17-2 in Section 4.17, *Utilities and Service Systems*, of this EIR, provides an overview of housing and employment growth projections from the City's 2020 UWMP, which were used to inform water demand and supply availability projections presented in the UWMP. As detailed in Section 4.17.2,

Regulatory Setting, BWP based its 2020 UWMP water demand forecasts on the City's 2021-2029 Housing Element Update and the SCAG 2020-2045 RTP/SCS.

As shown in Table 4.17-2 in Section 4.17, *Utilities and Service Systems*, the 2020 UWMP forecasted a total housing supply in Burbank of 58,401 units by the Increased Growth Alternative's horizon year of 2035. As described in Section 6.2.2(k), implementation of the Increased Growth Alternative would result in 60,769 total housing units in Burbank. Therefore, the Increased Growth Alternative would exceed the UWMP's 2035 housing forecast of 58,401 by 2,368 units, or four percent, and water demand associated with future residential development under the Increased Growth Alternative is not fully analyzed in the UWMP.

As with the residential components of the Increased Growth Alternative, the SCAG projections assessed in the City's 2020 UWMP account for future non-residential land uses that are also included under the Increased Growth Alternative. As shown in Table 4.17-2 in Section 4.17, *Utilities and Service Systems*, the 2020-2045 SCAG RTP/SCS forecasted a total of 134,669 jobs by the Increased Growth Alternative's horizon year of 2035. As described in Section 6.2.2(k), the Increased Growth Alternative would result in 14,219 new jobs in Burbank, which would increase the total jobs in Burbank from 127,800 to 142,019 jobs in 2035. Thus, the jobs generated by the Increased Growth Alternative would exceed the SCAG 2020-2045 RTP/SCS forecast by 7,350 jobs, or by five percent, and water demand associated with future employment under the Increased Growth Alternative is not fully analyzed in the UWMP.

UWMP Water Supply and Demand Analysis

As shown in Tables 4.17-2 through 4.17-8 in Section 4.17, *Utilities and Service Systems*, BWP can adequately meet water demands within its service area with identified supplies over a 20-year planning horizon under normal-year, single dry-year, and multiple dry-year conditions. This is partly due to the effectiveness of conservation programs implemented throughout the planning period. The projections shown above for imported surface and ground water supply availability indicate that sufficient supplies are available to meet the projected demands. These projections are based upon the BWP 2020 UWMP, which reflects forecasted population growth, as detailed above, as well as additional supplies associated with expansion of BWP's current water supply portfolio through increased conservation and conjunctive use management efforts. Because BWP water demands are not fully accounted for in the supply availability projections identified above, it is not anticipated that sufficient water supply is available for the Increased Growth Alternative demands.

As noted in the City's UWMP, future development projects that meet the definition of "project" in the California Water Code as amended by Senate Bill 610 are required to develop a project-specific WSA. The proposed Project is subject to CEQA and includes more than 500 dwelling units; however, as a planning document, not a development project, it does not directly trigger the need for a WSA as defined by the California Water Code. Nonetheless, a WSA was prepared to analyze the potential impacts associated with future development under the proposed Project and the Increased Growth Alternative, and for the purpose of providing a well-informed analysis of potential impact of water supply availability and reliability over the 2035 horizon year. The WSA, which was prepared by Rincon Consultants in December 2025, in accordance with the California Water Code, is provided as Appendix J. According to the WSA, the residential, non-residential, and hotel development under the Increased Growth Alternative at buildout would result in an overall demand of approximately 2.9 million GPD, or 3,302 AFY. As discussed above, BWP's 2020 UWMP does not fully account for the water demands associated with future development under the Increased Growth Alternative. Therefore, BWP may not have sufficient water supply available to meet the potential demands of the

proposed Project under normal year, single dry year, and multiple dry year conditions. No feasible mitigation exists to reduce potential water supply exceedance impacts. Therefore, impacts to water supply would be significant and unavoidable, which would be **greater than** the proposed Project. (*Greater impact*)

Wastewater Capacity

As discussed above under *Wastewater Facilities*, all wastewater generated in the City of Burbank is conveyed via sewer laterals to the sewer mainline, which conveys wastewater to the BWRP for treatment and reuse as applicable. The BWRP currently has limited remaining capacity with the ability to treat sewer inflows at an average rate of approximately 8.5 MGD. The Focused Sewer Capacity Analysis (Appendix H) determined that development under the Increased Growth Alternative would result in approximately 5.2 MGD of additional wastewater inflows to the BWRP, which would account for approximately 61 percent of the current BWRP average daily rate of 8.5 MGD. Therefore, the Increased Growth Alternative would result in additional wastewater flows that would account for the majority of the existing average daily rate of the BWRP and would exceed the existing limited remaining capacity, which would require substantial facility improvements to accommodate this additional wastewater flow. Compared to the proposed Project, this alternative would result in greater wastewater flows generated and would require a greater amount of facility improvements to accommodate the additional wastewater flow.

Additional capital improvement projects would be required to increase BWRP capacity to handle the majority of future flows from the Increased Growth Alternative. During certain periods when the capacity enhancements would be constructed at BWRP, it may be necessary to divert flow to the City of Los Angeles' North Outfall Sewer pipeline (LA NOS). However, long-term diversion to the LA NOS is not feasible due to regulatory and contractual constraints, as well as the increased diversion cost, which would include both sewer facilities charges and annual charges and is estimated to be approximately $60 million over ten years. Potential future improvements to increase the treatment capacity of the BWRP to accommodate development under the Increased Growth Alternative would require upgrades to the headworks, the addition of new primary clarifiers, modifications to the secondary treatment process, and expansion of the equalization basins (beyond the near-term 10-year planning horizon). Options for improving BWRP's secondary treatment processes could include either conversion to a membrane bioreactor or expansion of the BWRP's conventional secondary treatment facilities. BWRP's tertiary sand filters and chlorine contact tanks have relatively more capacity than the expansion processes listed above and are currently not the limiting processes in the treatment train. Additionally, BWRP expansion would likely require the City to acquire new land to build some of these improvements due to limited space in the current BWRP property.

In summary, as with the proposed Project, Public Works determined that these necessary improvements to BWRP would not be feasible within the 10-year horizon due to high costs, operational challenges during construction of improvements, and incompatibility with long-term facility planning. Implementation of Mitigation Measures UTIL-3a and UTIL-3b would support these longer-term upgrades to BWRP, however BWRP's capacity will remain insufficient to support full buildout of the Increased Growth Alternative until all capital improvement upgrades are completed. Until such upgrades are implemented, impacts to wastewater treatment capacity from the Increased Growth Alternative would remain significant and unavoidable but **greater than** the proposed Project. (*Greater impact*)

Solid Waste

Similar to the proposed Project, development accommodated by the Increased Growth Alternative would generate both construction and operational solid waste that would be disposed of at the Burbank Landfill Site No. 3, Sunshine Canyon Landfill, Simi Valley Landfill & Recycling Center, Antelope Valley Public Landfill, and other collection centers. The maximum daily throughputs and remaining capacities of the landfills serving the Specific Plan Area are shown in Table 4.17-1 in Section 4.17, *Utilities and Service Systems*. Solid waste generated by the Increased Growth Alternative would contribute to the overall capacity of these facilities. According to the CalEEMod results (Appendix C), future development under the Increased Growth Alternative would generate approximately 28,212 tons of solid waste per year, or 108.6 tons per day on average.[9]

The average daily solid waste generated by the Increased Growth Alternative would account for approximately 45 percent of the maximum permitted daily intake of 240 tons per day for Burbank Landfill Site No 3. The average daily solid waste generated by the Increased Growth Alternative would account for less than one percent of the maximum permitted daily intake of 12,100 tons per day for Sunshine Canyon Landfill. Additionally, the average daily solid waste generated by the Increased Growth Alternative would account for less than 0.2 percent of the maximum permitted daily intake of 64,750 tons per day for Simi Valley Landfill & Recycling Center. Finally, the average daily solid waste generated by the Increased Growth Alternative would account for approximately two percent of the maximum permitted daily intake of 5,548 tons per day for Antelope Valley Public Landfill. Therefore, the Increased Growth Alternative would not account for a substantial portion of the maximum permitted daily intakes of the landfills serving the City and the Increased Growth Alternative would not result in the generation of solid waste in excess of the capacity of local solid waste infrastructure.

Based upon the existing capacity of landfills available to the City, the solid waste generated by future development under the Increased Growth Alternative would not require the development of new or expanded solid waste facilities but, over time, would contribute to the need as other municipalities expand their residential and non-residential development. Similar to the proposed Project, development projects under the Increased Growth Alternative would generate solid waste, including construction debris. The handling of all debris and waste generated during construction of development projects under the Increased Growth Alternative would be subject to CALGreen Code requirements and the California Integrated Waste Management Act of 1989 (AB 939) requirements for salvaging, recycling, and reuse of materials from construction activities. In addition, development projects under the Increased Growth Alternative would be required to comply with federal, State, and local statues and regulations related to solid waste, such as AB 939 and the City's recycling programs. The Increased Growth Alternative would not generate solid waste in excess of State or local standards or otherwise impair the attainment of solid waste reduction goals. Therefore, impacts to solid waste would be less than significant but **greater** than the proposed Project. (*Greater impact*)

In compliance with State legislation, future development under the Increased Growth Alternative would be required to implement a Solid Waste Diversion Program and divert at least 75 percent of the solid waste generated from the applicable landfill site, similar to the proposed Project. Future development projects under the Increased Growth Alternative would also comply with federal, State, and local statutes and regulations related to solid waste, such as the California Waste Integrated Waste Management Act (AB 939), mandatory commercial recycling (AB 341, AB 1826), California State SB 1383 (SB 1383), and the City's recycling program. Since future development projects under the Increased Growth Alternative would comply with applicable federal, State, and local regulations

[9] Average daily disposal quantities are based on 260 days (5 days per week, average, based on operational hours for the City's solid waste services).

involving solid waste, impacts related to conflict with statutes and regulations governing solid waste would be less than significant and **similar to** the proposed Project. (*Similar impact*)

q. Wildfire

Emergency Response Plan or Emergency Evacuation Plan

Although the Increased Growth Alternative would introduce an increase in density to the Specific Plan Area compared to the proposed Project, development would occur within the same opportunity sites identified for the proposed Project. As detailed in Section 4.18, *Wildfire*, of this EIR, the Specific Plan Area is not found within an SRA; however, the majority of the Specific Plan Area south of SR-134 is designated as a VHFHSZ within an LRA. As with the proposed Project, the majority of the opportunity sites included in the Increased Growth Alternative are located in the northern portion of the Specific Plan Area, but some opportunity sites are located within the VHFHSZ portion of the Specific Plan Area, as shown in Figure 4.18-2 in Section 4.18, *Wildfire*. Therefore, similar to the proposed Project, the Increased Growth Alternative would result in development within the VHFHSZ portion of the Specific Plan Area.

Similar to the proposed Project, it is not expected that buildout of the Increased Growth Alternative would contribute to the critical fire environment because it would not increase the length of the WUI. The Increased Growth Alternative would involve the same pedestrian intersection improvements along West Olive Avenue at Riverside Drive, which include updating crosswalks, curb ramps, lighting, landscaping, and curb extensions, as identified for the proposed Project. These improvements on West Olive Avenue would occur within the existing right-of-way and would not result in temporary or permanent road closures to impair an emergency evacuation plan. Similar to the proposed Project, the Increased Growth Alternative does not include any changes or improvements to SR-134 and, thus, would not result in temporary or permanent road closures to impair an emergency evacuation plan.

Similar to the proposed Project, development under the Increased Growth Alternative would adhere to the fire safety design standards and emergency access requirements in the California Building Standards Code and the BMC. As part of standard development procedures, plans for future development projects under the Increased Growth Alternative would be submitted for review and approval to ensure that all new development would have adequate emergency access and escape routes in compliance with applicable regulations.

With the additional population growth that would result from implementation of the Increased Growth Alternative, the corresponding increase in traffic may impede the rate of evacuation for the City's residents in the event of a wildfire. Concurrently, the response times for emergency medical or containment services could also be adversely affected by increased traffic. However, the Increased Growth Alternative would not introduce any physical features or policies that would preclude implementation of or alter existing emergency response procedures. Therefore, access for emergency service providers and evacuation routes would be maintained during construction and operation activities associated with development under the Increased Growth Alternative. Potential impacts related to adopted emergency response plans or emergency evacuation plans would be less than significant **and similar to** the proposed Project. (*Similar impact*)

Exacerbation of Wildfire Risks and Exposure to Pollutant Concentrations

Construction of individual projects under the Increased Growth Alternative would result in a temporary increase in human activity and potential ignition sources, including equipment that could create sparks, be a source of heat, or leak flammable materials within the Specific Plan Area, similar

to the proposed Project. Heat or sparks from construction equipment, vehicles, and the use of flammable hazardous materials have the potential to ignite adjacent vegetation and start a fire, especially during weather events that include low-humidity and high wind speeds. The potential risk of wildfire ignition and spread associated with individual project construction would be potentially significant, similar to the proposed Project. Therefore, during construction of individual projects under the Increased Growth Alternative, Mitigation Measure W-1, described in Section 4.18, *Wildfire*, would be implemented to reduce the risk of wildfire by requiring equipment spark arrestors, red-flag restrictions, clear access roads, and fire protection and safety equipment. Therefore, potential construction-related impacts would be less than significant with mitigation incorporated and **similar to** the proposed Project. (*Similar impact*)

If wildfires occur nearby, there is potential for smoke to drift into the Specific Plan Area and increase pollutant concentrations for residents. Due to the location of the Specific Plan Area in a heavily urbanized area, the exposure of existing and future occupants of the Specific Plan Area to uncontrolled spread of wildfire is low. Although the Specific Plan Area is located north of the underdeveloped hillside terrain of Griffith Park and the Hollywood Hills, a natural and existing physical barrier, the Los Angeles River, which functions as a concrete-lined drainage channel separates the hillside from the Specific Plan Area. This barrier provides a buffer that reduces the potential for direct wildfire spread from the adjacent hillside into the Specific Plan Area. Therefore, similar to the proposed Project, the Increased Growth Alternative would not substantially exacerbate wildfire risks or expose future occupants to pollutant concentrations from a wildfire or contribute to the uncontrolled spread of wildfire. Potential impacts related to operation would be less than significant **and similar to** the proposed Project. (*Similar impact*)

Installation or Maintenance of Infrastructure

The Increased Growth Alternative would occur within the same Specific Plan Area as the proposed Project. The Specific Plan Area is in an urbanized area of the City that includes existing roads, pipelines, and overhead electrical infrastructure that serve surrounding commercial and residential properties. Power poles, overhead lines, and pipelines traverse the Specific Plan Area, providing electrical, telecommunications, water, and wastewater services to existing buildings and adjacent facilities. These utilities are operated by BWP, a community-owned utility that supplies electricity and water services throughout the City, along with private companies that provide telecommunication services. As detailed in Section 4.18, *Wildfire*, the Specific Plan Area is not located within a high-fire threat district designated by the CPUC, but the dense vegetated areas south of the Specific Plan Area are designated as a Tier 2 (elevated risk of potential impacts to people and property) high-fire threat district. BWP does not operate any facilities within the Tier 2 high-fire threat district located south of the Specific Plan Area. Thus, BWP facilities and equipment and their maintenance within the Specific Plan Area do not pose a direct wildfire hazard threat to the Tier 2 high-fire threat district located south of the Specific Plan Area.

Future development under the Increased Growth Alternative within the Specific Plan Area would be served by existing surrounding roads and extensions of existing power lines, water sources, and other utilities. The Increased Growth Alternative in itself does not propose the installation or maintenance of infrastructure that may exacerbate fire risk. The extension or improvement of infrastructure for future development projects under the Increased Growth Alternative would be implemented in accordance with all local and State regulations pertaining to power lines and other related infrastructure and fire suppression requirements, which would include requirements from the Uniform Building Code for fire protection and project would be subject to review and approval by the

Burbank Fire Department, similar to the proposed Project. Additionally, adherence to the strategies and programs detailed in BWP's 2024 Wildfire Mitigation Plan would minimize wildfire risk associated with the operation and maintenance of electrical infrastructure, including overhead powerlines within and near the Specific Plan Area. Therefore, compliance with existing regulations would ensure that potential impacts associated infrastructure improvements for development projects under the Increased Growth Alternative would be less than significant and **similar to** the proposed Project. (*Similar impact*)

Exposure to Downslopes or Downstream Flooding or Landslides

Development under the Increased Growth Alternative would occur within the same Specific Plan Area as the proposed Project. The Specific Plan Area is generally characterized by flat terrain that is developed and consists primarily of commercial and residential uses. The southern boundary of the Specific Plan Area abut Griffith Park and the Hollywood Hills, which include rugged hillsides, canyons, and residential development typical of Southern California's WUI zones with elevations ranging from approximately 538 feet above mean sea level to nearby peaks reaching 1,634 feet. The Specific Plan Area's southern portion is designated as a VHFHSZ within an LRA. The nearby steep slopes and heavy hillside vegetation contribute to wildfire risks due to the potential for downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Similar to the proposed Project, the Increased Growth Alternative would conform to design requirements associated with proper site preparation and grading practices and would implement surface drainage improvements and erosion control measures as well as construction BMPs. Construction BMPs would be implemented during grading operations, as specified in the SWPPP, to stabilize graded slopes and prevent excessive runoff and erosion. During operation, development under the Increased Growth Alternative would be located in a predominantly flat, urbanized setting where post-fire erosion risks are minimal, similar to the proposed Project. Furthermore, development under the Increased Growth Alternative would be subject to applicable building standards identified in Section 4.18, *Wildfire*, which ensure long-term site stability and minimize the potential for post-fire runoff or erosion impacts. As such, additional post-fire erosion control or slope stabilization measures are not anticipated to be necessary. As discussed in Section 4.19.5, *Geology and Soils*, the Specific Plan Area's risk of landslide is low, as the Specific Plan Area is in an urbanized, relatively flat area of the City. Thus, future development projects under the Increased Growth Alternative would not directly or indirectly cause impacts related to landslides, similar to the proposed Project. The Increased Growth Alternative would not expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Therefore, potential impacts would be less than significant and **similar to** the proposed Project. (*Similar impact*)

6.2.3 Project Objectives Fulfillment

The Increased Growth Alternative would allow increased density to the opportunity sites, development sites, and additional infill sites within the Specific Plan Area. The Increased Growth Alternative would meet the following objectives:

- Develop people-focused streetscapes and buildings that are sensitive to the surrounding intensity and scale of surrounding development.
  - The Increased Growth Alternative would involve identifying underutilized parcels as opportunity sites, concentrating development along transit corridors, and improving pedestrian, bicycle, and non-vehicular infrastructure, similar to the proposed Project.
- Allow sufficient and balanced development opportunities for media, medical, and other commercial establishments within the Media District.
  - The Increased Growth Alternative would involve the development of 7,265,850 square feet of commercial space, which would allow for additional employment, entertainment, and other neighborhood serving opportunities, similar to the proposed Project.
- Encourage higher development intensity in the center of the Media District and transition as it approaches existing low- and medium-scale residential areas.
  - The Increased Growth Alternative would involve the development of 14,312 residential units, providing a greater contribution to the City's RHNA goal to attain such goal, and approximately 7,265,850 square feet of commercial space within the core of the Specific Plan Area, similar to the proposed Project.
- Align and encourage residential and commercial growth near major transportation resources, including new transit stops, corridors, and with major mobility centers.
  - The Increased Growth Alternative would involve identifying underutilized parcels as opportunity sites, concentrating development along transit corridors, and improving pedestrian, bicycle, and non-vehicular infrastructure, similar to the proposed Project.
- Encourage more pedestrian and bicycle use through added infrastructure.
  - The Increased Growth Alternative would involve identifying underutilized parcels as opportunity sites, concentrating development along transit corridors, and improving pedestrian, bicycle, and non-vehicular infrastructure, similar to the proposed Project.
- Establish practical and objective design standards based on community feedback and best practices to ensure neighborhood compatibility and development.
  - The Increased Growth Alternative would involve updated objective design standards to ensure future high-density development aligns with the neighborhood character and context.
- Encourage affordable and workforce housing development in the center of the Media District.
  - The Increased Growth Alternative would include policies that could facilitate and implement the creation of workforce housing.
- Establish policies that will facilitate the streamlined development of a variety of housing in the center of the Media District.
  - The Increased Growth Alternative would include policies that could facilitate and implement streamlined development of a variety of housing types in the center of the Media District.

The Increased Growth Alternative would partially meet the following objective:

- Ensure that non-vehicular infrastructure and public service improvements are designed to accommodate the needs of all existing and future development.
  - The Increased Growth Alternative would involve identifying underutilized parcels as opportunity sites, concentrating development along transit corridors, and improving pedestrian, bicycle, and non-vehicular infrastructure, similar to the proposed Project. Further, as described above under Section 6.2.2(q), the Increased Growth Alternative would not maintain sufficient infrastructure for the existing or future development within the Media District, as the development under the Increased Growth Alternative would result in a significant and unavoidable wastewater treatment impacts.

6.3 Alternatives Considered but Rejected

As described above, *CEQA Guidelines* Section 15126.6(c) provides that the range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. Alternatives that fail to meet the fundamental project objectives need not be addressed in detail in an EIR.

An EIR is also required to identify any alternatives that were considered by the lead agency but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination. The following alternatives were considered by the City but are not evaluated further in this EIR, for the reasons discussed:

- **Current Utility Capacity Alternative.** An alternative was considered that would provide the maximum capacity for residential and non-residential development based on the maximum sewage capacity with the upgrades that are anticipated over the course of the 10-year span of the proposed Project. However, the maximum utilities capacity upgrades data needed for this alternative was unavailable at the time of preparation of this EIR; therefore, this analysis could not be completed.
- **Measure One Alternative.** An alternative that would increase the City's residential units to the limit established by Measure One was considered for full analysis. Measure One is the City's growth management initiative that is in effect until January 1, 2030, which allows for a maximum buildout of 18,600 residential units in the Medium Density, High Density and Various Commercial zone districts. This option was rejected as an alternative because Measure One is a Citywide limit on residential growth, so unlike the proposed Project, it does not include land use and mobility strategies that would directly apply to residential and commercial growth in the Specific Plan Area and, therefore, would not meet basic project objectives.

6.4 Comparison of Alternatives

Table 6-13 indicates whether each alternative's environmental impact is greater than, less than, or similar to that of the proposed Project for each of the issue areas studied.

Table 6-13 Impact Comparison of Alternatives

Issue Area	Proposed Project Impact Classification	Alternative 1: No Project Alternative	Alternative 2: Increased Growth Alternative
Aesthetics	Less than Significant	Less	Similar
Air Quality	Significant and Unavoidable	Less (Remains Significant and Unavoidable)/Similar	Greater/Similar
Biological Resources	Less than Significant with Mitigation Incorporated	Similar	Similar
Cultural Resources	Significant and Unavoidable	Similar	Similar
Energy	Less than Significant	Similar	Greater/Similar
Geology and Soils	Less than Significant with Mitigation Incorporated	Less	Greater/Similar
Greenhouse Gas Emissions	Less than Significant	Less	Greater/Similar
Hazards and Hazardous Materials	Less than Significant with Mitigation Incorporated	Less/Similar	Similar
Hydrology and Water Quality	Less than Significant	Similar	Similar
Land Use and Planning	Significant and Unavoidable	Similar	Greater/Similar
Noise	Significant and Unavoidable	Similar	Similar
Population and Housing	Less than Significant	Less/Similar	Greater/Similar
Public Services	Less than Significant	Less	Similar
Recreation	Less than Significant	Less	Similar
Transportation	Significant and Unavoidable	Slightly Greater	Less (Remains Significant and Unavoidable)/Similar
Tribal Cultural Resources	Less than Significant with Mitigation Incorporated	Similar	Similar
Utilities and Service Systems	Significant and Unavoidable	Less/Similar	Greater Similar
Wildfire	Less than Significant with Mitigation Incorporated	Similar	Similar

6.5 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6 states that an EIR should identify the "environmentally superior" alternative. "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." As shown in the Executive Summary section of this EIR, there would be significant and unavoidable impacts to air quality, cultural resources, land use and planning, noise, transportation, and utilities and service systems. Each of the evaluated alternatives would result in lesser environmental impacts on some environmental resources and greater impacts on others compared to the proposed Project. None of the alternatives presented would reduce all the impacts associated with the proposed Project.

The No Project Alternative would result in lesser impacts to aesthetics, air quality (remains significant and unavoidable), geology and soils, GHG emissions, hazards and hazardous materials, population and housing, public services, recreation, and utilities and service systems compared to the proposed Project. Impacts related to air quality, biological resources, cultural resources, energy, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, tribal cultural resources, utilities and service systems, and wildfire would be similar compared to the proposed Project. Impacts to transportation would be slightly greater compared to the proposed Project.

The Increased Growth Alternative would result in lesser impacts to transportation (remains significant and unavoidable) compared to the proposed Project. Impacts related to aesthetics, air quality biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire would be similar compared to the proposed Project. Impacts to air quality, energy, geology and soils, GHG emissions, land use and planning, population and housing, and utilities and service systems would be greater compared to the proposed Project.

Based on this comparative analysis, the No Project Alternative would be the environmentally superior alternative. However, Section 15126.6(e) of Title 14 of the CCR states that "If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." Thus, under the strict direction of Section 15126.6(e), the environmentally superior alternative would be identified as the Increased Growth Alternative. In practice, however, the No Project Alternative remains environmentally superior based on the comparative analysis undertaken in this section.

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