Willow Distribution Station Upgrades Project

Initial Study/Mitigated Negative Declaration

Prepared for:

City of Burbank
Water and Power
164 W. Magnolia Boulevard
Burbank, CA 91502

Prepared by:

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February 2022

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1.0 INTRODUCTION

Project Title:	Willow Distribution Station Upgrades Project
Project Location:	228 South Naomi Street, City of Burbank
Project Applicant:	City of Burbank Water and Power 164 W. Magnolia Boulevard Burbank, California 91502
Lead Agency:	City of Burbank Water and Power 164 W. Magnolia Boulevard Burbank, California 91502
Contact Person:	Michael Wang, P.E., PMP, Senior Electrical Engineer (818) 238-3578 MWang@burbankca.gov
General Plan Designation(s):	Media District Commercial
Zoning Designation(s):	Media District General Business (MDC-3)

PROJECT SUMMARY

The subject of this Initial Study is the Willow Distribution Station Upgrades Project. Burbank Water and Power (BWP) is proposing demolition of the existing facility which is currently owned and operated by BWP as a 34.5/4.3 kilovolt (kV) distribution station and will be re-constructed as a new 69/12.47kV station. New underground 69kV and 12.47kV conduits and duct banks (proposed and future) carrying new high voltage power cables and fiber optic cables would be installed from inside the substation to go across both South Naomi Street and West Willow Street in the public right-of-way past the property line. Construction activities are anticipated to take up to 24 months. Construction of the proposed project includes demolition, trenching, grading and installation of electric utility infrastructure, landscape improvements, and paving.

PURPOSE OF THIS INITIAL STUDY

The California Environmental Quality Act (CEQA) requires state and local agencies to identify potential significant impacts of their actions and where possible avoid or mitigate those impacts. The City of Burbank is the Lead Agency for the proposed project. This Initial Study is a preliminary analysis prepared in accordance with CEQA by the City as Lead Agency to determine whether an Environmental Impact Report (EIR), Negative Declaration (ND), or Mitigated Negative Declaration (MND) must be prepared to evaluate the potential impacts of the project.

This Initial Study is an informational document and its preparation and distribution by the City neither presupposes nor mandates any action on the part of the City, or other agencies from whom permits and other discretionary approvals would be sought, with respect to the project. If, through an Initial Study, the City concludes that there is evidence that a project may cause a significant environmental effect, the City shall find that an EIR shall be prepared to analyze potential environmental impacts. The analysis contained in this Initial Study indicated that a MND is sufficient to evaluate the proposed project.

ORGANIZATION OF INITIAL STUDY

This Initial Study is organized into six sections as follows:

Section 1.0, Introduction, identifies the project and provides a brief summary of the project components. The Introduction also summarizes the purpose and structure of this Initial Study.

Section 2.0, Environmental Setting, describes the existing conditions, surrounding land use, general plan, and existing zoning of the project site.

Section 3.0, Project Description, provides a detailed description of the project.

Section 4.0, Environmental Analysis, includes an analysis for each resource topic and identifies the potential impacts of implementing the project.

Section 5.0, References, identifies printed references and individuals cited in this Initial Study.

Section 6.0, List of Preparers, identifies the individuals who prepared this Initial Study.

2.0 ENVIRONMENTAL SETTING

PROJECT LOCATION

The proposed project consists of two primary components: 1) distribution station (herein referred to as "substation") and 2) new underground 69kV and 12.47kV conduits and duct banks carrying new high voltage power cables and fiber optic cables (herein referred to as "underground transmission cables"). The substation and underground cables are collectively referred to as the "proposed project" or "project."

The project site is located in the southwest portion of the City of Burbank. The regional location of the project site is shown on Figure 1. The current address for the proposed substation is 228 South Naomi Street. As shown on Figure 2, the proposed substation would be located on Assessor Parcel Number (APN) 2484-021-900. The substation site is bordered by West Willow Street to the north, South Naomi Street to the west, and a surface parking lot and multi-story parking garage to the east and south. As shown on Figure 3 and Figure 4, the underground transmission cables would be installed in public right-of-way in the following roadways: South Naomi Street, West Willow Street, North Frederic Street, West Verdugo Avenue, North California Street, and West Alameda Avenue.

EXISTING CONDITIONS

The substation site includes approximately 16,948 square feet of lot area (0.39 acre), which is flat in topography. As shown on Figure 2, the substation site is developed and contains the existing Naomi Distribution Station and a one-story control building including a control room, switchgear, small bathroom, and battery room. The entire substation site is covered by impervious surfaces (i.e., asphalt paving or structures) and enclosed with a 10-foot-tall concrete masonry wall.

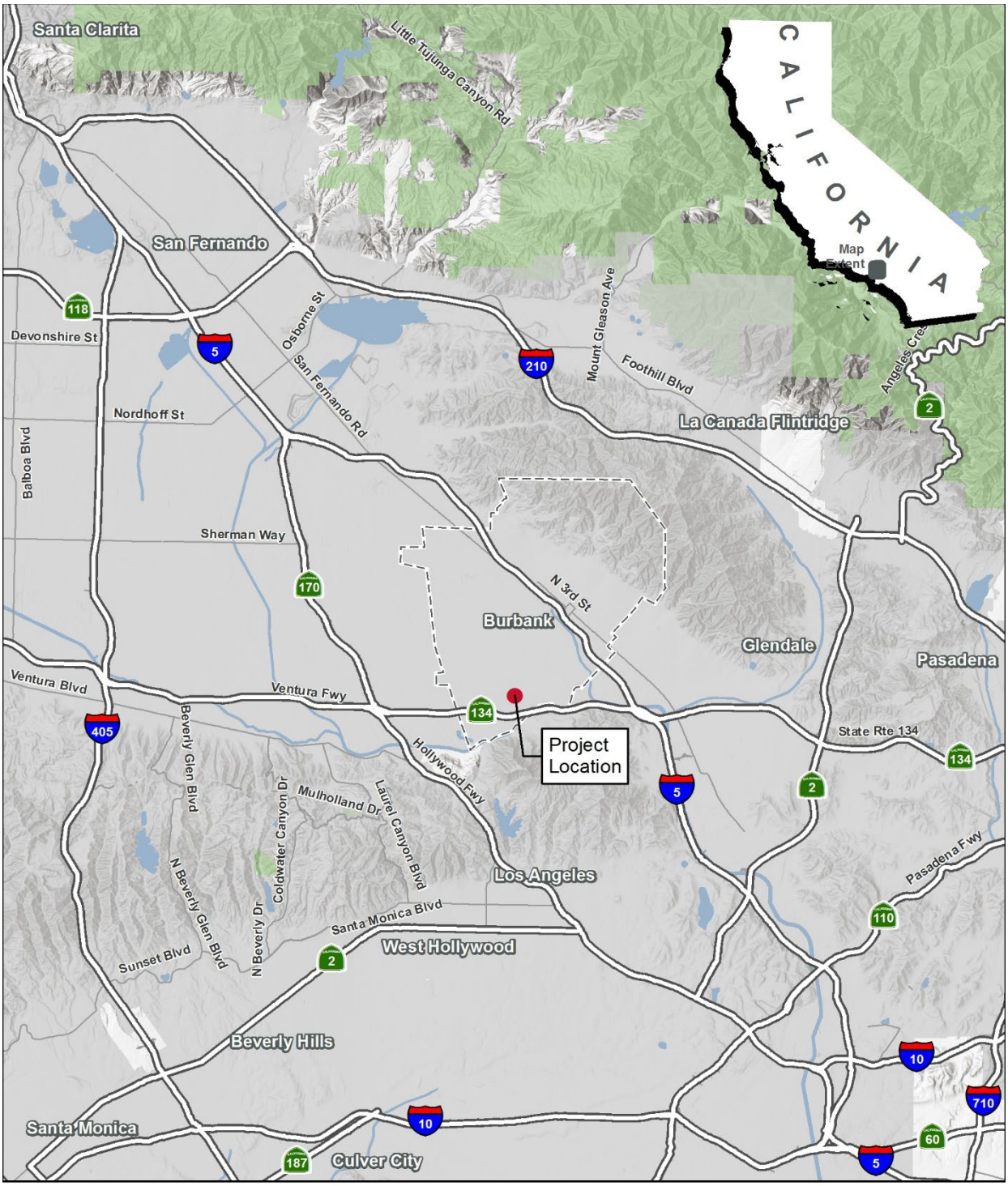
SURROUNDING LAND USES

The Burbank 2035 General Plan land use designation for the substation site and surrounding area is Media District Commercial. The Media District Commercial area is a regional employment center comprised of a variety of media-oriented and commercial uses (City of Burbank 2013a). The substation site is in an area that is developed primarily with commercial and medical uses. Surrounding land uses include commercial buildings to the north, medical buildings to the east and south, and medical and commercial buildings and an assisted living facility to the west. Residential uses are located east of South Buena Vista Street and north of West Olive Avenue.

General Plan Designation(s): Media District Commercial

Zoning Designation(s): Media District General Business (MDC-3)

Figure 1. Regional Location



LEGEND

- Project Location
- City of Burbank

0 Miles 3

Figure 2. Aerial View of Substation Site

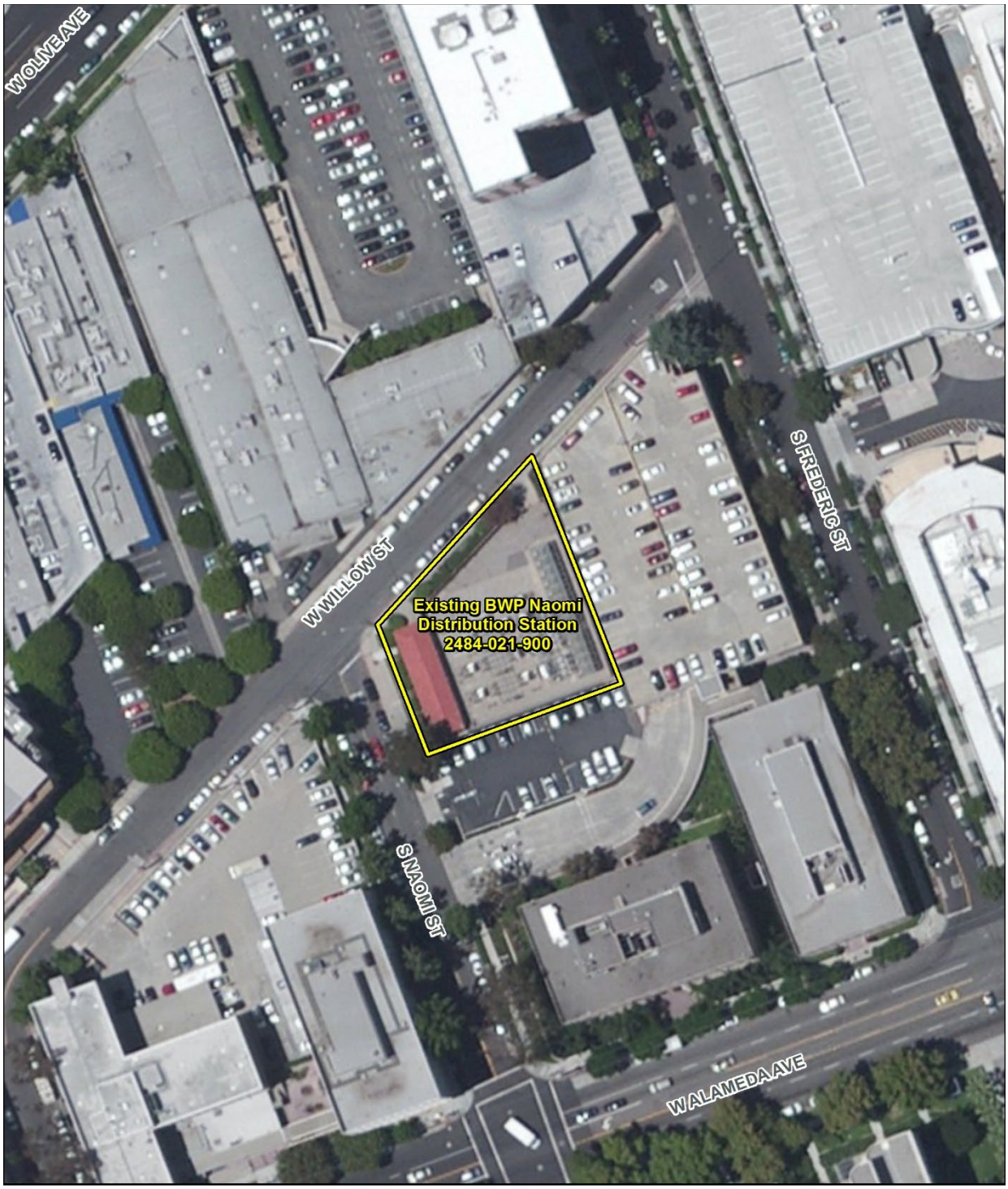


Figure 3. Proposed Underground 69kV Transmission Cables

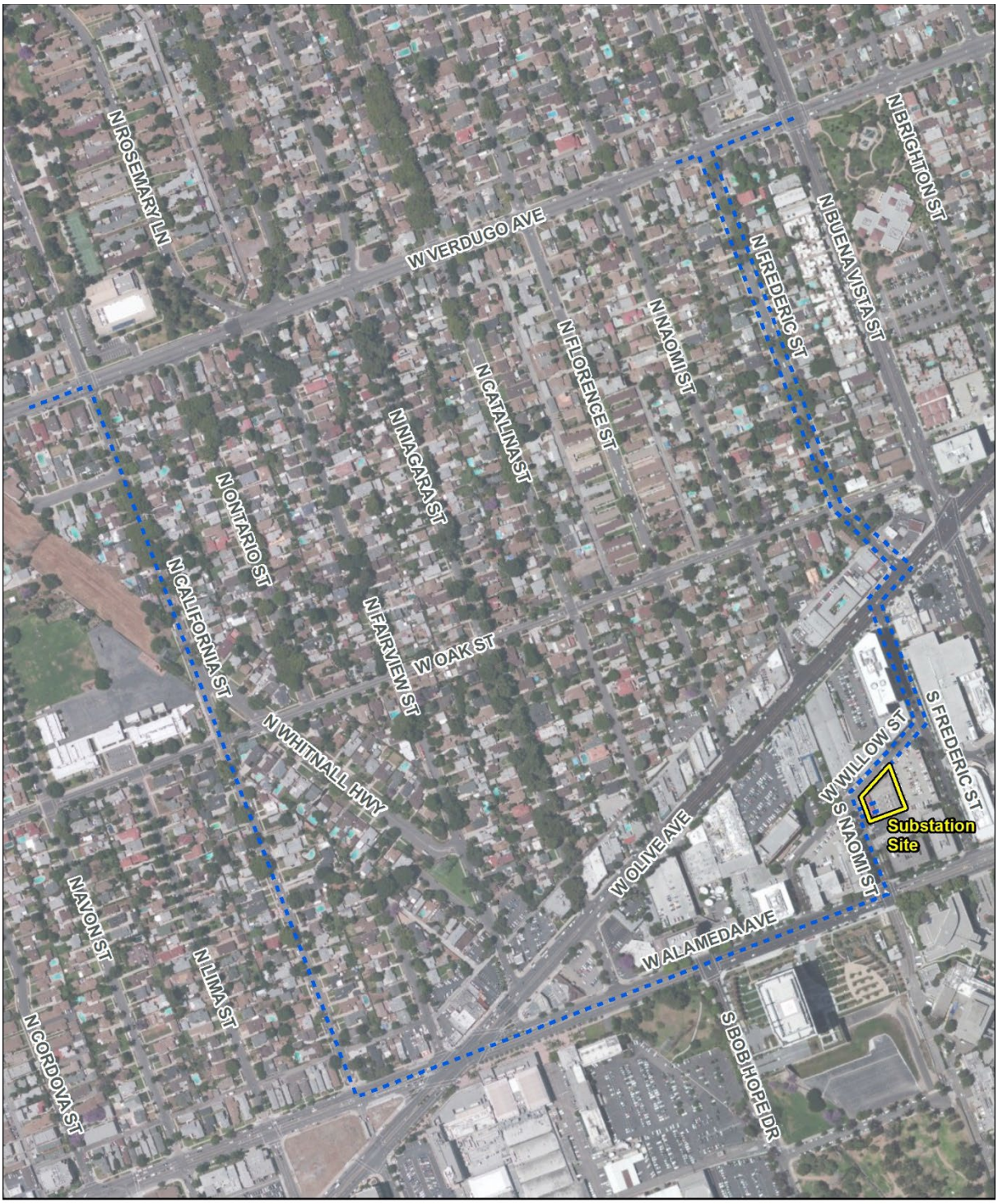


Figure 4. Proposed Underground 12kV Transmission Cables

3.0 PROJECT DESCRIPTION

BACKGROUND

Burbank Water and Power (BWP) provides electrical service within the City of Burbank. Electrical service is provided through a distribution network, which includes electric stations, transmission lines, distribution lines, and transformers. BWP's current distribution system includes 13 distribution substations, two customer substations, and four switching stations. A large portion of Burbank's electric infrastructure was constructed from the 1940s through the 1960s to serve the typical loads of that era, with 4 kilovolt (kV) service. The infrastructure has since been expanded and updated over the years. Commercial developers supported and assisted in funding the expansion of the BWP system, beginning the transition from a 4 kV system to the more reliable 12 kV service and from large air-insulated electric substations to smaller, more modern, gas-insulated substations (City of Burbank 2018).

BWP strives to operate and maintain equipment such that it will provide value as long as possible with the goal of aging equipment assets gracefully. Due to consistent maintenance, repairs, and conservative loading practices, these substations have been meeting this goal. Many of the older substations have major equipment that has exceeded expected lifetimes. Continued operation of the oldest substations means increased maintenance costs and difficulty in finding parts for older, obsolete equipment, and increases BWP's risk of prolonged outages due to failed equipment.

PROPOSED DEVELOPMENT

Substation

As shown on Figure 5, BWP proposes to demolish the existing Naomi Distribution Station, including the existing control building, which is currently owned and operated by BWP as a 34.5/4.3 kilovolt (kV) distribution station and re-construct it as a new 69/12.47kV station. The new substation would include installation of incoming underground conduits from outside the station that will contain two new incoming underground 69kV transmission lines (in the form of cables), and a future third line that will transition underground into a high voltage 69kV indoor Gas Insulated Switchgear (GIS) inside the station. The 69kV GIS equipment will be configured as a 6-breaker ring bus and would be housed inside a Concrete Masonry Unit (CMU) building. Other components inside the station will consist of a 69kV relay room and underground 69kV cables to connect the GIS equipment to three 33 MVA, 69/12.47kV transformers (2 transformers installed as part of this project, 1 transformer will be installed in the future). The transformers would connect via underground cables to a 15kV arc-resistant medium voltage metal clad switchgear (MVSG) located inside CMU buildings in the station. The MVSG will connect to capacitor bank units located inside CMU buildings in the station. The station will additionally house outdoor pad mount station service equipment and have provisions for expansion of the 15kV gear in the future, to accommodate a future transformer, capacitor bank, and underground feeders.

Setbacks
As shown on Figure 5, the proposed project would include a 5-foot setback along Naomi Street and West Willow Street for landscaping. There would be no setback on the southern and eastern property line.

Access/Transportation
Vehicular access to the substation site is readily available from South Naomi Street and West Willow Street. A 20-foot-wide driveway is proposed along South Naomi Street and another 20-foot-wide driveway is proposed along West Willow Street in order to accommodate vehicular access to the substation.

Site Security
The existing block wall along the perimeter of the substation site would be removed and replaced with a new concrete block wall. A concrete block wall would be installed along the perimeter of the substation site. The height of the perimeter wall would vary from 12 feet to 23 feet 4 inches depending on the location and equipment needed to be enclosed.

Underground Transmission Cables
New underground 69kV and 12.47kV conduits and duct banks (proposed and future) carrying new high voltage power cables and fiber optic cables would be installed from inside the substation to go across both South Naomi Street and West Willow Street in the public right-of-way past the property line. The underground transmission cables would also be installed in public right-of-way in the following roadways:

- North and South Frederic Street
- West Olive Avenue
- West Verdugo Avenue,
- North California Street, and
- West Alameda Avenue.

Construction
Construction activities are anticipated to take up to 24 months. Construction of the proposed project includes demolition of the existing substation including the existing control building, trenching, grading and installation of electric utility infrastructure, landscape improvements, and paving. Construction equipment is anticipated to include graders, cranes, trucks, and various handheld equipment. Construction staging for the proposed substation would be on-site and a portion of the parking lane on South Naomi Street and/or West Willow Street may be utilized for the duration of construction. Construction staging for the proposed underground transmission cables may occur along existing roadways and nearby available parking lot space. Construction

of the proposed project would not require more than 15 on-site workers on any given day during the construction period.

Construction of the proposed project will occur between the hours of 7 a.m. to 7 p.m. on the weekdays, and 8 a.m. to 5 p.m. on weekends, in accordance with Burbank Municipal Code (BMC) Section 9-1-1-105.8.

CITY OF BURBANK APPROVAL ACTIONS

Actions and approvals required from the City in association with the proposed project include:

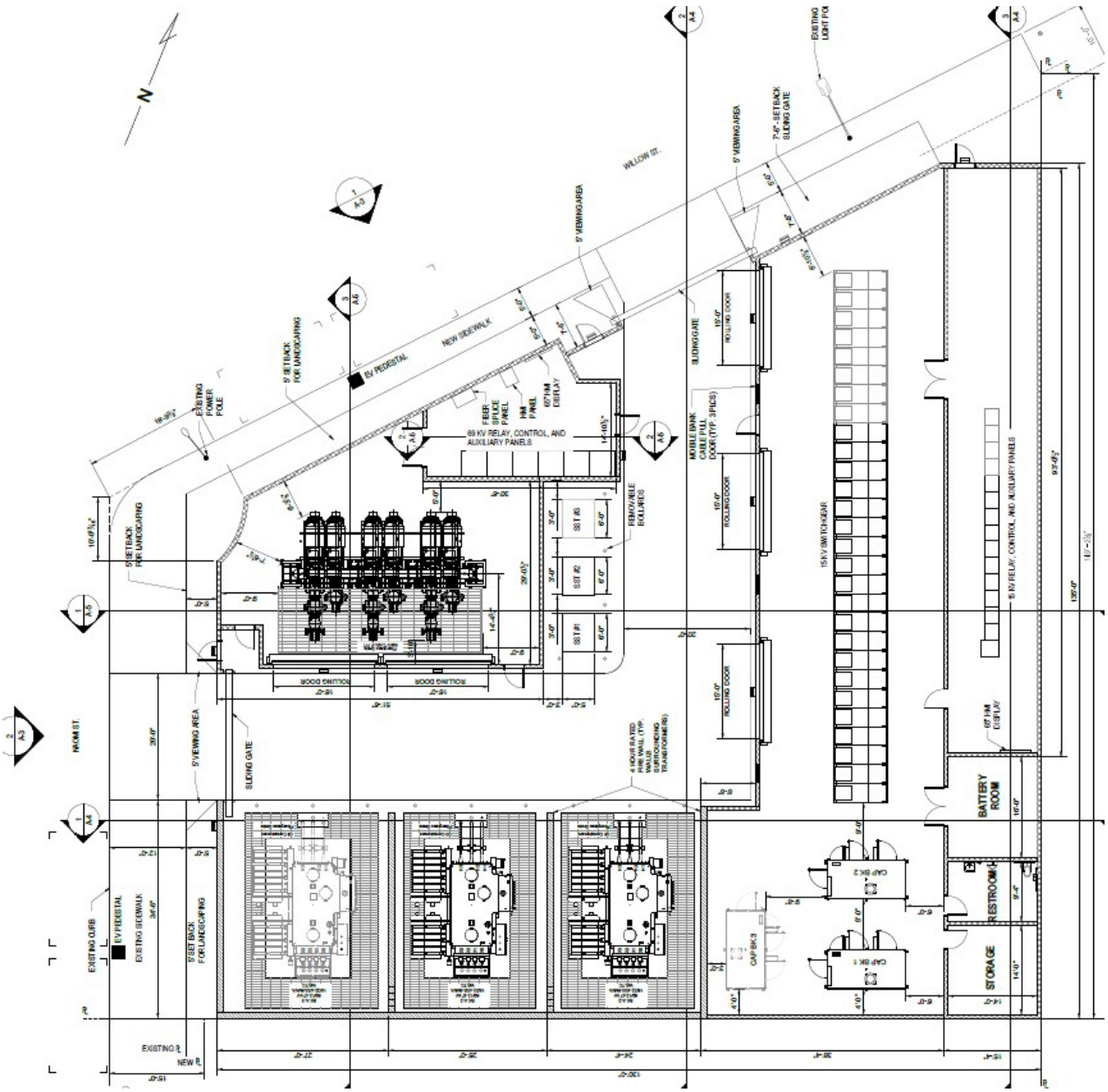
- Demolition Permit
- Grading Permit
- Engineering and Building Permits
- Encroachment Permit

RELATED TECHNICAL REPORTS

The following technical reports and studies were utilized in the preparation of this Initial Study, and are hereby incorporated by reference:

- Phase I Environmental Site Assessment, prepared by HDR, April 12, 2021
- Phase II Technical Memorandum, prepared by HDR, July 2, 2021

Figure 5. Substation Site Plan



4.0 ENVIRONMENTAL ANALYSIS

This section of the Initial Study contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, California Code of Regulations, Title 14, Chapter 3, Sections 15000-15387).

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would involve at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Geology/Soils
☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials	☐ Hydrology/Water Quality
☐ Land Use/Planning	☐ Mineral Resources	☐ Noise
☐ Population/Housing	☐ Public Services	☐ Recreation
☐ Transportation/Traffic	☐ Utilities/Service Systems	☐ Mandatory Findings of Significance

DETERMINATION:

On the basis of this initial evaluation:

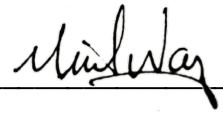
☐ I find that the project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated impact” on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to an earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

2/22/2022

Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3) Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4) 4"Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a) Earlier Analysis Used. Identify and state where they are available for review.
    b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures, which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:

    a) the significance criteria or threshold, if any, used to evaluate each question; and
    b) the mitigation measure identified, if any, to reduce the impact to less than significant.

4.1 AESTHETICS

		Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
AESTHETICS – Would the project:					
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	☐	☐	☐	☒
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	☒	☐

Discussion

a. Would the project have a substantial adverse effect on a scenic vista?

Less than Significant Impact: The proposed project is located in an area that is developed primarily with commercial and medical uses. According to the Burbank 2035 General Plan, scenic vistas are described as "viewpoints that provide expansive views of a highly valued landscape for the benefit of the general public" (City of Burbank 2013a). Within the City of Burbank, scenic vistas include views of the Santa Monica Mountains to the south and the Verdugo Mountains to the northeast. Looking south from the South Naomi Street/Willow Street intersection, a partial view of the Santa Monica Mountains is visible. However, potential public views across the site are primarily blocked by existing development consisting of taller buildings (approximately 5-6 story buildings) immediately south of the project site. Therefore, the proposed project would not substantially alter scenic vistas. This is considered a less than significant impact.

Mitigation Measures: No mitigation measures are necessary.

b. 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: According to the EIR for the Burbank 2035 General Plan, there are no officially designated scenic highways in Burbank under the California Department of Transportation Scenic Highway Program (City of Burbank 2013a). Therefore, the proposed project would not substantially damage scenic resources within a view corridor and no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact: The substation site is developed and contains the existing Naomi Distribution Station and a rectangular one-story control building. The entire substation site is covered by impervious surfaces and enclosed with a concrete masonry wall. The proposed project would demolish the existing Naomi Distribution Station and re-construct it as a new distribution station. The proposed project would also include the construction of two driveways, utility infrastructure, perimeter block wall, and landscaping. The project site is in an area that is developed primarily with commercial and medical uses. Surrounding land uses include commercial buildings to the north, medical buildings to the east and south, and medical and commercial buildings and an assisted living facility to the west. The proposed project would be compatible with the existing land uses in the immediate vicinity. Furthermore, the proposed project would adhere to the design standards and guidelines of the City's Municipal Code.

The underground transmission cables would be installed within public roadway right-of-way and would be located within developed areas that already contain existing overhead and underground transmission and distribution lines. The proposed underground system would not be visible when in place.

Based on these considerations, the proposed project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. A less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

d. Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Less than Significant Impact: The proposed project is located in a developed portion of Burbank where there are high levels of ambient nighttime lighting, including street lighting, building and security lighting, and indoor building illumination. The project does not propose the construction, operation, or use of infrastructure that would create a new source of substantial light or glare, which would adversely affect day or nighttime views of the area. The proposed

project would include lighting in the event that emergency nighttime work is required within the outdoor spaces of the substation, such as the switchgear and transformer areas. Similar to existing conditions, the substation would have some lighting near the entry ways. The proposed project does not propose the use of highly polished or highly reflective metal material. As such, the project would not introduce new sources of glare to the surrounding area. A less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

4.2 AGRICULTURE AND FORESTRY RESOURCES

		Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
AGRICULTURE AND FORESTRY RESOURCES – Would the project:					
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b)	Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
c)	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))?	☐	☐	☐	☒
d)	Result in the loss of forest land or conversion of forest land to non-forest land use?	☐	☐	☐	☒
e)	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?	☐	☐	☐	☒

Discussion

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact: The proposed project is located in a developed area of the City of Burbank. According to the Environmental Impact Report (EIR) for the Burbank 2035 General Plan, no designated Important Farmland is located within the city (City of Burbank 2013b). Therefore, the proposed project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use and no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

b. Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?

No Impact: According to the EIR for the Burbank 2035 General Plan, no Williamson Act contracts are located within the City (City of Burbank 2013b). The substation site is zoned Media District General Business (MDC-3). Additionally, the proposed underground transmission cables would be located within public roadway right-of-way. The proposed project is not located on or adjacent to land zoned for agricultural use, or subject to a Williamson Act contract. The proposed project has no potential to conflict with existing zoning for agricultural use or a Williamson Act contract. Therefore, no impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

c. 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: The proposed project is located in a developed area of the City of Burbank. The proposed project is not located on forest land as defined in PRC Section 1220 (g). There are no existing forest lands, timberlands, or timberland zoned Timberland Production either on-site or in the immediate vicinity; therefore, the proposed project would not conflict with existing zoning of forest land or cause rezoning of any forest land. Additionally, the project site is not zoned as forest, timberland or for Timberland Production. Therefore, no impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

d. Would the project result in the loss of forest land or conversion of forest land to non-forest land use?

No Impact: There are no existing forest lands either on-site or in the immediate vicinity of the proposed project. Therefore, the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

e. 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: As discussed in Response 4.2(a) above, the project site does not contain any lands mapped by the State Department of Conservation as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The project site is not used for agricultural production.

Furthermore, as discussed in Response 4.2(c) above, the project site is not located on forest land as defined in PRC Section 1220 (g). Implementation of the proposed project would not convert any Farmland to non-agricultural use or forest land to non-forest use. Therefore, no impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

4.3 AIR QUALITY

	Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
AIR QUALITY – Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) 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?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☒	☐

Discussion

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant: The proposed project is located within the South Coast Air Basin (SCAB), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As such, SCAQMD's 2016 Air Quality Management Plan (AQMP) is the applicable air quality plan. Projects that are consistent with the regional population, housing, and employment forecasts identified by the Southern California Association of Governments (SCAG) are considered to be consistent with the AQMP growth projections, since the forecast assumptions by SCAG forms the basis of the land use and transportation control portions of the AQMP. Additionally, because SCAG's regional growth forecasts are based upon, among other things, land uses designated in general plans, a project that is consistent with the land use designated in a general plan would also be consistent with the SCAG's regional forecast projections and thus also with the AQMP growth projections.

The proposed project involves the demolition of the existing substation, including the existing control building, and the subsequent construction and operation of a substation, and installation of underground transmission cables. The proposed project would not induce population growth as no new residential uses are proposed. The Burbank 2035 General Plan land use designation for the project site is Media District Commercial. Development of the project site with the proposed substation would be consistent with the land uses anticipated by the Burbank 2035 General Plan. The proposed underground transmission cables would be located within public roadway right-of-way (e.g., paved roads). The underground transmission cables would be located in developed areas already containing existing transmission lines and distribution lines

(both overhead and underground). Therefore, the proposed project is consistent with the General Plan and growth projections accounted for in SCAQMD's AQMP.

The thresholds of significance, adopted by the air district (SCAQMD), determine compliance with the goals of the attainment plans in the region. As such, emissions below the SCAQMD thresholds presented would not conflict with or obstruct implementation of the applicable air quality plans. The following analysis is broken out by a discussion of potential impacts during construction of the project followed by a discussion of potential impacts during operation of the project.

Construction

Specific criteria for determining whether the potential air quality impacts of a project are significant are set forth in the SCAQMD's CEQA Air Quality Handbook (2011). The following daily thresholds for construction emissions have been established by the SCAQMD and were used in the analysis of air quality impacts for the proposed project to determine significance:

- 75 pounds per day (lbs/day) of reactive organic gases (ROGs)
- 100 lbs/day of nitrogen oxides (NOx)
- 550 lbs/day of carbon monoxide (CO)
- 150 lbs/day of particulate matter less than 10 microns (PM_{10})
- 55 lbs/day of particulate matter less than 2.5 microns ($PM_{2.5}$)
- 150 lbs/day of sulfur oxides (SO)

Projects in the SCAB with construction-related emissions that exceed any of the emission thresholds above are considered potentially significant by the SCAQMD.

The proposed project would generate criteria air emissions during short-term construction activities. Operation of construction equipment such as graders, cranes, backhoes, and trucks, would generate criteria air emissions. Also, emissions would be generated by material delivery vehicles and workers' vehicles traveling to and from the project site. Construction emissions would occur on a short-term basis and would cease upon completion of all construction activities (24 months).

The most recent version of the CalEEMod model (Version 2020.4.0) was used to calculate the project's construction emissions. The CalEEMod spreadsheets are included in Appendix A of this Initial Study. The total emissions generated on-site and off-site during peak construction days for each phase of construction of the proposed project are presented in Table 1. The PM_{10} and $PM_{2.5}$ emissions incorporate 61 percent reduction in fugitive dust as a result of watering

disturbed areas three times a day. The emissions presented in Table 1 are based on the best information available at the time of calculations and specify that the schedule for all improvements is anticipated to take approximately 24 months. Because construction operations on-site must comply with dust control and other measures prescribed by SCAQMD Rules 402 and 403, as well as to ensure that short-term construction/ impacts are minimized, compliance with these rules is assumed in Table 1.

Table 1. Project Construction Criteria Pollutant Emissions (pounds per day)

Project Phases	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Demolition	1.74	16.81	14.49	0.03	1.00	0.83
Grading	1.57	17.01	9.60	0.02	3.21	2.01
Site Preparation	1.34	14.65	7.40	0.02	2.78	1.73
Construction (Trenching)	1.59	12.00	13.34	0.03	0.76	0.57
Paving	0.79	5.89	9.25	0.01	0.43	0.30
Peak Daily Emissions	**1.74**	**17.01**	**14.49**	**0.03**	**3.21**	**2.01**
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds SCAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

As shown in Table 1, short-term emissions during project construction would not exceed the SCAQMD daily construction emissions thresholds. Therefore, resulting in a less than significant impact. No mitigation measures are required.

Localized Significance Thresholds

In addition to the significance thresholds listed above, SCAQMD also requires analysis of localized air quality impacts. For the proposed project, the appropriate Source Receptor Area (SRA) for localized significance thresholds (LSTs) is East San Fernando Valley (SRA No. 7), according to the SRA/City Table on the SCAQMD LST website[1].

The closest sensitive receptors to the project site are residences located along North Frederic Street and North California Street at a distance of approximately 50 feet (15 meters). However, the shortest distance that can be used according to the LST guidelines is 25 meters. Therefore, the following LST construction thresholds for a 1-acre site, apply for this project:

[1] http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds

- 80 lbs/day of NOx at 25 meters
- 498 lbs/day of CO at 25 meters
- 4 lbs/day of PM_{10} at 25 meters
- 3 lbs/day of $PM_{2.5}$ at 25 meters

Table 2 shows the construction-related emissions of CO, NOX, PM_{10}, and $PM_{2.5}$ compared to the LSTs for the East San Fernando Valley area at a distance of 25 meters. As required by the SCAQMD's LST Methodology described within the Final Localized Significance Threshold Methodology (SCAQMD 2008), only the on-site construction emissions are included in Table 2.

Table 2. Summary of On-Site Construction Emissions, Localized Significance by Task

Project Phases	CO	NO_X	PM_{10}	$PM_{2.5}$
Demolition	13.96	16.62	0.804	0.78
Grading	9.22	16.98	3.10	1.97
Site Preparation	7.09	14.63	2.69	1.70
Construction (Trenching)	12.61	11.71	0.51	0.50
Paving	8.83	5.86	0.28	0.26
Peak Daily Emissions	**13.96**	**16.98**	**3.10**	**1.97**
SCAQMD Thresholds	**498**	**80**	**4**	**3**
Exceeds SCAQMD Threshold?	**No**	**No**	**No**	**No**

Table 2 shows the calculated emissions rates for the proposed on-site construction activities are below the LSTs for CO, NOx, PM_{10}, and $PM_{2.5}$. Therefore, the proposed project would not cause any short-term localized air quality impacts, and no mitigation is required. Due to the relatively limited scale of construction required for the proposed project, construction related emissions would not exceed the daily significance thresholds established by the SCAQMD. Therefore, construction activities associated with the proposed project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. A less than significant impact is identified for this issue area.

Operations

Following construction, the proposed project would not result in long-term operational emissions. The proposed project does not include an Operation and Maintenance building,

which typically requires workers to travel on-site daily. No on-site stationary source emissions would be generated in association with project operation. Very minimal maintenance is required for operation of the facility, amounting to approximately two to four workers entering the site for maintenance activities a couple times a year, and one to two workers conducting monthly inspections of the facility. The project would not contribute substantially to an existing or projected air quality violation. Therefore, a less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

b. 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?

Less than Significant Impact: As discussed in Response 4.3(a), the proposed project would result in short-term temporary air emissions associated with the construction phase. However, due to the relatively limited scale of construction required for the proposed project, the level of emissions generated during the construction phase would not exceed SCAQMD significance thresholds. Furthermore, the proposed project would not generate substantial emissions during operations due to minimal mobile emissions associated with maintenance and monitoring activities. Based on these considerations, the proposed project would not contribute to a cumulatively considerable net increase of any criteria pollutant that the project region is non-attainment under (ozone and PM_{10}) and a less than significant impact is identified.

Mitigation Measures: No mitigation measures are necessary.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact: The SCAQMD defines sensitive receptors or sites (land uses) as including schools, playgrounds, childcare centers, long-term health care facilities, rehabilitation centers, convalescent centers, hospitals, retirement homes, and residences. The closest sensitive receptors to the project site are residences located along North Frederic Street and North California Street at a distance of approximately 50 feet. As discussed in Response 4.3(a), the calculated emissions rates for the proposed on-site construction activities are below the LSTs for CO, NOx, PM_{10}, and $PM_{2.5}$. Therefore, the proposed project would not cause any short-term localized air quality impacts. A less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

d. Would the project result in other emissions (such as those leading to odors adversely affecting a substantial number of people?

Less than Significant Impact: The SCAQMD lists land uses primarily associated with odor complaints as waste transfer and recycling stations, wastewater treatment plants, landfills, composting operations, petroleum operations, food and byproduct processes, factories, and agricultural activities, such as livestock operations. The proposed project does not include any of these land uses.

The proposed project could produce odors during proposed construction activities resulting from construction equipment exhaust and application of asphalt. However, standard construction practices would minimize the odor emissions and their associated impacts. Furthermore, any odors emitted during construction are temporary, short-term, and intermittent in nature, and would cease upon the completion of construction. Additionally, construction activities would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions that would create a public nuisance. The proposed project will not create objectionable odors affecting a substantial number of people during construction, and short-term impacts would be less than significant.

No objectionable odors affecting a substantial number of people are anticipated during long term operation. The operation of the project does not involve odor-generating uses. A less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

4.4 BIOLOGICAL RESOURCES

		Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
BIOLOGICAL RESOURCES – Would the project:					
a)	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?	☐	☒	☐	☐
b)	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 US Fish and Wildlife Service?	☐	☐	☐	☒
c)	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?	☐	☐	☐	☒
d)	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?	☐	☐	☐	☒
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion

a. ***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?***

Less than Significant Impact with Mitigation Incorporated: The proposed project is located in a highly developed area of the City of Burbank and the immediate vicinity is entirely built-out

with commercial and medical uses. Additionally, the proposed underground transmission cables would be located within public roadway right-of-way. The substation site is developed and contains the existing Naomi Distribution Station and a rectangular one-story building. The entire substation site is covered by impervious surfaces (i.e., asphalt paving or structures). There are no natural or open space areas in the project vicinity. The proposed project involves the demolition of the existing Naomi Distribution Station and reconstructing a new substation on the same site. Due to the developed nature of the project site, the proposed project would not impact any habitat that supports species identified as candidate, sensitive or special status in local, regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. However, the project involves the removal of one tree on West Willow Street and trimming a neighboring property tree. Construction and tree removal during the breeding season for migratory birds (February 1 – August 31), have the potential to impact bird species protected under the Migratory Bird Treaty Act. However, Mitigation Measure BIO-1 would require pre-construction nesting bird surveys to be conducted prior to site grading and vegetation removal to determine the presence of active nests. If active nests are found, 100-foot buffers (300 feet for raptors) shall be established and flagged under the supervision of a qualified biologist. No construction activities shall occur within these buffers until the nests are vacated and juveniles are fledged. Implementation of Mitigation Measure BIO-1 would reduce this potential impact to a level less than significant.

Mitigation Measures:

BIO-1 If construction activities, including site grading and vegetation removal, are to be conducted during the breeding season for migratory birds (February 1 – August 31), pre-construction surveys shall be conducted for nesting birds within 7 days of such activities. Surveys shall be performed by a qualified biologist. If active nests are found, 100-foot buffers (300 feet for raptors) shall be established and flagged under the supervision of a qualified biologist. No construction activities shall occur within these buffers until the nests are vacated and juveniles are fledged.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact: As discussed in Response 4.4(a) above, the proposed project is located in an area that is entirely developed. No riparian habitat or designated sensitive natural communities exist on the project site or in the surrounding area. Therefore, the proposed project would have no impact to riparian habitat or sensitive natural communities.

Mitigation Measures: No mitigation measures are necessary.

c. 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?

No Impact: The project site is developed with impervious surfaces and is not near nor does it contain wetlands. Therefore, implementation of the proposed project would not have a substantial adverse effect on state or federally protected wetlands. No impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

d. 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?

No Impact: No native biological resources exist on the project site, which is fully developed with urban uses. As such, the proposed project would have no impact on the movement of any native resident or migratory fish or wildlife species or within established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Therefore, no impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

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

No Impact: Pursuant to Burbank Municipal Code (BMC) Section 7-4-108, the City maintains a restricted list of trees in the City, including landmark trees, trees of outstanding size and beauty, and dedicated trees. These trees must be identified, mapped and recorded, and given special treatment to retain and protect them. The proposed project involves the removal of one tree on West Willow Street and trimming a neighboring property tree. However, these trees are not identified on the Restricted Tree List included in BMC Section 7-4-108. Therefore, the proposed project would not result in a conflict with BMC Section 7-4-108. No Impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

f. 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?

No Impact: According to the EIR for the Burbank 2035 General Plan, the City does not have an adopted Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP) (City of Burbank 2013b). Therefore, the proposed project would not have an impact to an

adopted HCP, NCCP, or other approved local, regional, or state habitat conservations plan. No impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

4.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Discussion

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact: The substation site is developed and contains the existing Naomi Distribution Station and a rectangular one-story control building. Based on a review of the City of Burbank's Historic Preservation Plan, none of the structures on the project site are listed as potentially significant historic properties (City of Burbank 1999). The proposed underground transmission cables would be installed within existing public roadway right-of-way and would not affect any existing structures. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource as defined in Section §15064.5 of the CEQA Guidelines and no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less than Significant Impact: The project site has been substantially disturbed by grading activities associated with previous development of the substation and roadways. Any significant archaeological resources would have likely been unearthed during past grading of the project site. Minimal grading would be necessary for the proposed project, further reducing the potential that archaeological resources could be directly or indirectly impacted. The City will be required to comply with existing regulations, including California Public Resources Code Section 21083.2 that specifies the protocol if archaeological resources are discovered during excavation, trenching, grading, or construction activities. Therefore, a less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

c. Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant Impact: The project site has been substantially disturbed by grading activities associated with previous development of the substation and roadways. No known burial sites are located within or adjacent to the project site. It is unlikely that any human remains would be found or disturbed on the project site. However, California law recognizes the need to protect historic-era and Native American human burials, skeletal remains, and items associated with Native American interments from vandalism and inadvertent destruction. The procedures for the treatment of Native American human remains are contained in California Health and Safety Code Section 7050.5 and 7052 and California PRC Section 5097. In accordance with the California Health and Safety Code, if human remains are uncovered during ground-disturbing activities, the contractor and/or the project proponent are required to immediately halt potentially damaging excavation in the area of the burial and notify the Los Angeles County Coroner and a professional archaeologist to determine the nature of the remains. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (Health and Safety Code Section 7050.5[b]). If the coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission (NAHC) by phone within 24 hours of making that determination (Health and Safety Code Section 7050[c]). Following the coroner's findings, the property owner, contractor or project proponent, an archaeologist, and the NAHC-designated Most Likely Descendent (MLD) shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The responsibilities for acting on notification of a discovery of Native American human remains are identified in California PRC Section 5097.9. Therefore, a less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

4.6 ENERGY

	Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
ENERGY – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Discussion

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

Less than Significant Impact: Construction activities associated with the proposed project would require the consumption of fossil fuel resources, for example diesel fuel and gasoline to power the off-road construction equipment and construction vehicles. Additionally, construction would require the manufacture and delivery of new equipment and materials, which would require energy use. Depending on the materials, some of the debris to be removed and demolished as part of the project would be salvageable and recyclable. The energy used by the proposed project during construction would not be wasteful, inefficient, or unnecessary in light of the new facilities that would increase capacity and system reliability.

Operations, including inspection, patrol, and maintenance, of the proposed project components would also require use of fossil fuel resources. However, no new crews would be added by the project, and maintenance would be incorporated to BWP's existing maintenance programs. The operation and maintenance activities would not change from BWP's existing activities, and thus, operation would not cause any change in the consumption or use of energy resources. A less than significant impact would occur due to the direct or indirect energy consumption of the proposed project.

Mitigation Measures: No mitigation measures are necessary.

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant Impact: BWP provides electrical service within the City of Burbank. Electrical service is provided through a distribution network, which includes electric stations, transmission lines, distribution lines, and transformers. BWP strives to operate and maintain equipment such that it will provide value as long as possible with the goal of aging equipment

assets gracefully. Many of the older substations have major equipment that has exceeded expected lifetimes. Continued operation of the oldest substations means increased maintenance costs and difficulty in finding parts for older, obsolete equipment, and increases BWP's risk of prolonged outages due to failed equipment.

BWP proposes to demolish the existing Naomi Distribution Station which is currently owned and operated by BWP as a 34.5/4.3 kV distribution station and re-construct it as a new 69/12.47kV station with new underground 69kV and 12.47kV conduits and duct banks that will carry new high voltage power and fiber optic cables from the new substation. The new 69/12.47kV station and associated components would allow BWP to increase capacity and the efficiency of the system's ability to deliver electricity to California's end users. Therefore, the proposed project would not conflict with any state or local plan for prioritizing renewable energy or energy efficiency.

Mitigation Measures: No mitigation measures are necessary.

4.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. 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? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) 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?	☐	☐	☒	☐
d) 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?	☐	☐	☒	☐
e) 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?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Discussion

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. 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 Impact: According to the Burbank 2035 General Plan, no Alquist-Priolo Earthquake Fault Zone has been designated in the City of Burbank (City of Burbank 2013a). However, several active faults are located near the project site including the Verdugo Fault approximately 3 miles to the northeast and the Hollywood Fault approximately 3.6 miles to the southeast. No faults run through the project site nor is the site within an Alquist-Priolo Earthquake Fault Zone. Therefore, the project would not expose people or structures to substantial adverse effects from rupture of a known earthquake fault. This is considered a less than significant impact.

Mitigation Measures: No mitigation measures are necessary.

ii. Strong seismic ground shaking?

Less than Significant Impact: The project site is located within an active seismic region. As such, the project site could experience strong seismic ground shaking during an earthquake. As identified in Response 6a.i. several nearby faults, including the Verdugo Fault, pose a potential for strong seismic ground shaking. However, the potential for ground shaking due to seismic activity is common throughout the Southern California area. As a standard condition of project approval, the proposed project would be constructed in accordance with the California Building Standards Code (CBSC), also known as California Code of Regulations (CCR), Title 24 (Part 2), and the City of Burbank Building Code. A less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact: Liquefaction is a destructive side effect of seismic shaking. Liquefaction happens when shaking increases pore water pressure and causes the soil to lose its strength and behave as a liquid. The excess pore pressures are often pushed upward through fissures and soil cracks, which causes water-soil slurry to bubble onto the ground surface. Liquefaction occurs primarily in saturated and loose, fine- to-medium-grained soils, in areas where the groundwater table lies within 50 feet of the surface (City of Burbank 2013a).

According to Exhibit S-4: Liquefaction Zones of the Burbank 2035 General Plan, the proposed project is located in an area with the potential for liquefaction (City of Burbank 2013a). Except in some areas along the Ventura Freeway (SR 134) in the southwestern portion of the city, most groundwater underlying Burbank is deeper than 100 feet below the ground surface. Groundwater levels have been dropping because of pumping in water wells. As long as groundwater continues to be extracted in the upper Los Angeles River area and annual rainfall remains at normal levels, groundwater levels in Burbank can be expected to remain deeper than 50 feet, resulting in a low risk of liquefaction for most of the city (City of Burbank 2013a). As a standard condition of project approval, the proposed project would be constructed in accordance with the most current CBSC and City of Burbank Building Code to minimize the potential hazard of liquefaction on the project site. A less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

iv. Landslides

No Impact: Landslide hazards are related to both slope and to seismic activity. The project site and surrounding areas are relatively flat and contain minimal rises or changes in elevation. According to Exhibit S-5: Earthquake-Induced Landslide Zones of the Burbank 2035 General Plan, the project site is not located in an area susceptible to landslide hazards (City of Burbank 2013a). No impact related to landslides would occur.

Mitigation Measures: No mitigation measures are necessary.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact: The project site is completely developed and covered with impervious surfaces. After completion, the proposed project would mimic existing impervious conditions and almost completely cover the project site. Soil would be exposed during construction, creating the potential for erosion. However, the proposed project would be required to implement sediment and erosion control Best Management Practices (BMPs) imposed by the City through the grading and building permit process to minimize or avoid any erosion. This is considered a less than significant impact.

Mitigation Measures: No mitigation measures are necessary.

c. 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?

Less than Significant Impact: As noted above, the project site is currently developed and likely received some level of geotechnical consideration of underlying materials prior to construction. As required by the City in accordance with local and state building code

requirements, any proposed development would be required to complete a geotechnical evaluation of any onsite hazards. As a standard condition of project approval, the proposed project would be constructed in accordance with the most current CBSC and City of Burbank Building Code to minimize or avoid the potential hazard of unstable soils on the project site. A less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

d. 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?

Less than Significant Impact: The project site has been substantially disturbed by grading activities associated with previous development of the substation and roadways, and likely received some level of geotechnical consideration of underlying materials prior to construction. As required by the City and in accordance with local and state building code requirements, any proposed development would be required to complete a geotechnical evaluation of any onsite hazards. As a standard condition of project approval, the proposed project would be constructed in accordance with the most current CBSC and City of Burbank Building Code to minimize or avoid the potential hazard of expansive soil. A less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

e. 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: The project site is located in a developed area that is served by the wastewater collection, conveyance, and treatment system operated by the City of Burbank. The project's wastewater demand would be accommodated via connections to this existing wastewater infrastructure. The proposed project would not install septic tanks or alternative wastewater disposal systems. Therefore, no impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact: The project site has been substantially disturbed by grading activities associated with previous development of the substation and roadways. Any significant paleontological resources would have likely been unearthed during past grading of the project site. Minimal grading and trenching would be necessary for the proposed project, further reducing the potential that paleontological resources could be directly or indirectly impacted. Furthermore, the project applicant shall be required to comply with existing regulations,

including California Public Resources Code Section 21083.2 that specifies the protocol if paleontological resources are discovered during excavation, grading, or construction activities. Therefore, a less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

4.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Discussion

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less than Significant Impact: The greenhouse gas (GHG) emissions associated with the proposed project would primarily be associated with project-related construction activities. There would be only minimal energy consumption, water consumption, and solid waste generation associated with project operation. The City of Burbank has not adopted any numerical thresholds of significance for GHG emissions.

14 CCR 15064.4 of the CEQA Guidelines presents guidelines for determining the significance of impacts from GHG emissions. The specific language from the regulation is reproduced below:

> "The determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of greenhouse gas emissions resulting from a project."

Several air districts in California have defined numeric GHG significance thresholds ranging from 900 to 25,000 metric tons per year. The value defined by local air districts varies, depending upon the level of further analysis and/or mitigation that is triggered by surpassing the threshold.

On December 5, 2008, SCAQMD adopted GHG significance thresholds for Stationary Sources, Rules, and Plans where the SCAQMD is lead agency. The threshold uses a tiered approach. A proposed project is compared with the requirements of each tier sequentially and would not result in a significant impact if it complies with any tier. Tier 1 excludes projects that are specifically exempt from Senate Bill (SB) 97 from resulting in a significant impact. Tier 2 excludes projects that are consistent with a GHG reduction plan that has a certified final CEQA

document and complies with Assembly Bill (AB) 32 GHG reduction goals. Tier 3 excludes projects with annual emissions lower than a screening threshold. For industrial stationary source projects, the SCAQMD adopted a screening threshold of 10,000 $MTCO_2e$ per year ($MTCO_2e$/yr). This threshold was selected to capture 90 percent of the GHG emissions from these types of projects where the combustion of natural gas is the primary source of GHG emissions. For all non-industrial projects, the SCAQMD is proposing a screening threshold of 3,000 $MTCO_2e$ per year. SCAQMD concluded that projects with emissions less than the screening thresholds would not result in a significant cumulative impact.

For the proposed project, the 10,000 $MTCO_2e$ per year threshold is used as the significance threshold.

During construction of the project, GHG emissions would be emitted through the operation of construction equipment, on-site heavy-duty vehicles, equipment hauling materials to and from the project site, grading, utility engines, and asphalt paving, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

The most recent version of the CalEEMod model (Version 2020.4.0) was used to calculate the construction emissions. The construction-related GHG emissions generated during peak construction days for each phase of construction of the proposed project are presented in Table 3.

Table 3. Project Construction GHG Emissions (Metric Tons CO_2e)

Project Phases	Total CO_2e Emissions in Metric Tons
Demolition	23.01
Grading	19.12
Site Preparation	15.95
Construction (Trenching)	316.26
Paving	12.96
Total GHG Emissions	**387.30**

SCAQMD's GHG emissions policy for construction activities is to amortize emissions over a 30-year lifetime. When amortized, the proposed project's annual construction emissions would be approximately 13 metric tons. Therefore, the estimated construction GHG emissions from the

proposed project are well below significance thresholds thus far suggested (e.g., SCAQMD's 10,000 metric tons/year threshold for industrial project) and are not anticipated to directly result in a significant impact. The proposed project would not result in a substantial population growth, as the number of employees required to operate and maintain the facility is minimal. The proposed project would not substantially increase traffic conditions within the project area, resulting in a substantial contribution of GHG emissions. Therefore, a less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

b. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less than Significant Impact: AB 32, the California Global Warming Solutions Act of 2006 (codified in the California HSC, Division 25.5), acknowledged the threat that GHGs pose to the health, safety, and welfare of California communities, and established statewide targets for GHG emission reductions, requiring that emissions be reduced to 1990 levels by 2020. AB 32 serves as the primary plan, policy or regulation adopted in the State of California to reduce GHG Emissions. In 2016, SB 32 and its companion bill AB 197 amended HSC Division 25.5 and established a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and include provisions to ensure that the benefits of State climate policies reach into disadvantaged communities.

As discussed above, the estimated construction GHG emissions from the proposed project are well below SCAQMD's significance thresholds. Also, the proposed project would not otherwise result in the generation of GHG emissions as a result of operational activities, and does not conflict with the City's Greenhouse House Gas Reduction Plan (GGRP). The GGRP was developed to meet the intent of AB 32 and as an implementing document for Burbank 2035. The GGRP provides an inventory of current GHG emissions in Burbank. In addition, emission reduction measures and actions presented in the GGRP implement the goals, policies, and implementation actions of the Air Quality & Climate Change Element to reduce GHG emissions and improve overall air quality and environmental health. Therefore, the implementation of the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG. No impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

4.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) 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?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	☐	☒	☐
d) 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, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan, or, where such a plan has not been adopted, within 2 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?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

Discussion

a. 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 Impact: During construction of the proposed project, a limited amount of hazardous materials would be transported to, stored, and used on the property (fuel, paint, etc.) that are typical with construction activity and would not create a significant hazard to the public

or environment. Construction activities would comply with applicable federal, State, and local regulations that would reduce potential hazards during the transport, use, or disposal of these materials. During operation, the project would not involve the use or production of any hazardous waste material in significant quantities to create a significant hazard. There would be transformer oil used in the transformers for cooling and insulation purposes. The transformers would include oil containment basins in order to prevent potential spills from reaching storm drains. A less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

b. 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?

Less than Significant Impact with Mitigation Incorporated: The following information is summarized from the Phase I Environmental Site Assessment (ESA) and Phase II ESA prepared for the proposed project. These reports are provided as Appendix B and C, respectively, of this Initial Study.

Phase I ESA

The Phase I ESA was conducted in accordance with the scope and limitations of the American Society for Testing and Materials (ASTM) Practice E1527-13. The preparation of the Phase I ESA included an environmental records review; a data gap analysis; historical research; and a site reconnaissance and interviews.

A Phase I ESA was prepared to identify recognized environmental conditions (RECs) that may adversely affect the substation site. A REC is defined as: The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.

The Phase I ESA identified three RECs in connection with the substation site:

- The San Fernando Valley (SFV) Superfund Site's North Hollywood Wellfield Area Burbank Operable Unit was identified in the database report as a National Priority Listing site that underlies the project site. The SFV Superfund Site is a 20-square-mile area of contaminated groundwater located primarily in North Hollywood and Burbank, California. Contaminants of concern are mainly volatile organic compounds (VOCs) including trichloroethylene (TCE) and perchloroethylene (PCE).

- The use of PCB-containing oils in electrical equipment at the substation site prior to the 1990s is likely. The historical use of PCBs prior to regulatory reporting requirements is a REC.

- The existing onsite transformers containing dielectric oil are considered aboveground storage tanks.

Due to the potential for near-surface soil contamination with PCB oil near the transformers located on the substation site, a Phase II ESA was performed for the substation site and is summarized below.

Phase II ESA

The purpose of the Phase II ESA was to collect soil and concrete wipe samples and analyze the samples for contaminants of concern (COCs), based on the documented environmental histories or suspected contaminant releases at the property.

Concrete wipe samples and soil samples were collected and analyzed to indicate whether or not PCB impacts are present on the substation site. One shallow soil sample was collected from below the gravel base (approximately 6 inches deep) at eight locations, adjacent to the three existing transformers. The laboratory results of the soil and concrete samples are summarized below:

- **Total Petroleum Hydrocarbons (TPH):** All eight soil samples were analyzed for TPH in the gasoline, diesel, and motor oil ranges. Gasoline-range organics were not detected above the laboratory reporting limit of 0.20 milligrams per kilogram (mg/kg). Diesel-range organics were detected in one sample, SS4, at a concentration of 11 mg/kg. Oil-range organics were detected in two samples, SS3 and SS4, at concentrations of 63 and 65 mg/kg, respectively.
- **VOCs:** All eight soil samples were analyzed for VOCs. VOCs were not detected in soil samples.
- **Title 22 Metals:** All eight soil samples were analyzed for metals. Six samples contained concentrations of metals consistent with background concentrations for Southern California soil. Soil sample SS5 contained elevated concentrations of copper (1300 mg/kg), lead (72 mg/kg), and zinc (1800 mg/kg). Soil sample SS6 contained elevated concentrations of cadmium (11 mg/kg) and zinc (1800 mg/kg). Elevated zinc concentrations did not exceed thresholds requiring additional analysis. However, copper and lead in sample SS5 and cadmium in sample SS6 were analyzed for their soluble fractions by the California Soluble Threshold Limit Concentration test. The copper content of sample SS5 exceeded the threshold for hazardous waste under California's Title 22.
- **PCBs:** All eight soil samples and all three concrete wipe samples were analyzed for PCBs. PCBs were not detected in soil samples above the laboratory reporting limit of 130 micrograms per kilogram (µg/kg). PCBs were not detected in concrete wipe samples above the laboratory reporting limit of 4.0 micrograms per wipe (µg/wipe).

Based on the laboratory results, TPH, VOCs, and PCBs in soil and in the concrete pads below the transformers do not present a hazardous waste risk to the proposed project. However, Title 22 metals, particularly copper in the vicinity of sample SS5, may present a hazardous waste risk. If construction activities remove soil from this area, project-related construction activities would carry the potential for encountering contaminated soil. This potential impact is considered significant. However, implementation of Mitigation Measure HAZ-1 would reduce this potential impact to a level less than significant.

There is a potential to encounter unreported contaminated soils during excavation and grading activities associated with the substation site and trenching associated with the underground transmission cables. If hazardous substances were encountered during construction of the proposed project and if materials were improperly managed or disposed, workers and the public would be potentially exposed to contaminated materials. This potential impact is considered significant. However, implementation of Mitigation Measure HAZ-2 would reduce this potential impact to a level less than significant.

Asbestos and Lead-Based Paint

Asbestos was used extensively from the 1940s until the late 1970s. Although asbestos is usually safe when it is undisturbed and the asbestos containing materials (ACMs) are in good condition, once disturbed (such as during remodeling or demolition) the fibers can become airborne. The EPA has determined that there is no safe exposure level to asbestos. Lead is a highly toxic metal that was used until 1978 in paint and other products found in and around residences. Lead may cause a range of health effects, from behavioral problems and learning disabilities, to seizures and death. Lead based paint (LBP) has been banned since 1978, but many older structures still have this paint on walls, woodwork, siding, windows, and doors.

A limited asbestos and LBP assessment (EFI Global 2021) was conducted on February 18, 2020 to determine the presence of ACMs and LBP at the substation property. Sampling was limited to building materials only. Due to electrical shock hazards, sampling was not performed of materials suspected to contain asbestos or lead that are commonly present on energized electrical equipment include the transformers. The asbestos and LBP assessment was performed by a certified asbestos consultant and California Department of Public Health Lead Sampling Technician.

The laboratory results indicate that black mastic around PVC pipes contained asbestos content above the threshold limit of 1%. All other materials sampled as part of the assessment were found not to contain asbestos content. The following painted components were found to have LBP: doors, door frames, fencing I-beams, roofing, and bathroom sink (EFI Global 2021).

A significant impact would occur if the project would involve the demolition of commercial, industrial, or residential structures that may contain ACM, LBP, and/or other hazardous

materials and as a result, the project would represent a significant hazard to the public or the environment. Based on the limited asbestos and LBP assessment conducted at the substation property, ACMs and LBP were detected in the substation. Therefore, the proposed project has the potential to create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of ACMs and LBP into the environment. However, implementation of Mitigation Measure HAZ-3 would reduce this potential impact to a level less than significant.

Mitigation Measures:

HAZ-1 Prior to construction, the project contractor shall prepare a construction hazardous materials management plan that outlines the following soil handling requirements and procedures:

1. Obvious Sign of Contamination: In all cases when conducting earthwork activities, soil that exhibits obvious signs of contamination shall be segregated and stockpiled separately from other presumed-clean soil, and the resident engineer notified. Obvious signs of contamination include the following:

   - Visible staining or discoloration
   - Strong odors
   - Oily residue
   - Free-flowing liquids other than water

   The segregated soil shall be sampled and analyzed by an environmental laboratory for TPH (EPA Method 8015), VOCs (EPA Method 8260), and Title 22 metals (EPA Methods 6010 and 7471). Offsite disposal shall be approved by the resident engineer.

2. Known or Suspected Contamination: As a result of the site soil site investigation, it is suspected that near-surface soil in the vicinity of sampling location SS5 may meet the definition of hazardous waste under California Title 22. Soil that is to be disturbed by earthwork activities, excluding crushed rock and gravel base, within a 5-foot radius of this location shall be segregated and stockpiled separately from other soil, even if it does not exhibit obvious signs of contamination. The segregated soil shall be sampled and analyzed by an environmental laboratory for TPH (EPA Method 8015), VOCs (EPA Method 8260), and Title 22 metals (EPA Methods 6010 and 7471). Offsite disposal shall be approved by the resident engineer.

3. Stockpiles: Segregated soil shall be placed upon polyethylene sheeting with a minimum thickness of 8 mil. Piles shall be covered with polyethylene sheeting with a minimum thickness of 8 mil at the end of each day and whenever the stockpiles are not in active use. Stockpiles shall also conform to all the requirements of the Stormwater Pollution Prevention Plan (SWPPP).

4. Onsite Soil Reuse: Soil that is disturbed during earthwork activities may be reused onsite if it does not fall under the categories of Section 1 or Section 2 above. The resident engineer reserves the right to approve or reject any soil for onsite reuse at their discretion.

HAZ-2 All construction contractors shall immediately stop all surface or subsurface activities in the event that potentially hazardous materials are encountered, an odor is identified, or considerably stained soil is visible. Contractors shall follow all applicable local, state, and federal regulations regarding discovery, response, disposal, and remediation for hazardous materials encountered during the construction process.

HAZ-3 Prior to the issuance of a demolition permit, a Hazardous Materials Assessment (surveys) will be performed to determine the presence or absence of ACMs/LBP located in the electrical equipment, including the transformers, to be demolished. Suspect materials that would be disturbed by the demolition activities would be sampled and analyzed for asbestos content, or assumed to be asbestos containing. All lead containing materials and asbestos containing materials scheduled for demolition must comply with applicable regulations for demolition methods and dust suppression. Lead containing materials and asbestos containing materials shall be managed in accordance with applicable regulations. The ACM survey shall be conducted by a person certified by the California Division of Occupational Safety and Health. The LBP survey shall be conducted by a person certified by the California Department of Health Services. Copies of the surveys will be provided to the City of Burbank Community Development Department and South Coast Air Quality Management District once completed.

c. 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?

Less than Significant Impact: The closest school to the proposed project is Robert Louis Stevens Elementary School located at 3333 West Oak Street, which is just west of the proposed underground 69Kv line along North California Street. During construction of the proposed project, a limited amount of hazardous materials would be transported to, stored, and used on the property (fuel, paint, etc.) that are typical with construction activity and would not create a significant hazard to the public or environment. Construction activities would comply with applicable federal, state, and local regulations that would reduce potential hazards during the

transport, use, or disposal of these materials. Therefore, a less than significant impact has been identified.

Mitigation Measures: No mitigation measures are necessary.

d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 [inclusive of Section 25356 of the Health & Safety Code] and, as a result, would it create a significant hazard to the public or the environment?

Less than Significant Impact: An environmental records review was conducted by Environmental Risk Information Services (ERIS) to determine if the substation site is included on any federal, state, local, and tribal databases. The ERIS report included 145 listing within the search radii, and 4 listings (BURBANK CUPA, LA COUNTY CUPA, CERS TANK, and FINDS/FRS) were reported for the substation site.

- **BWP Naomi Substation, 228 South Naomi Street (Project Site):** This site is listed in BURBANK CUPA and the LA COUNTY CUPA, indicating that it has a storage tank. The CERS TANK lists the site under the following Regulated Programs: Chemical Storage Facilities and Aboveground Petroleum Storage. The FINDS/FRS record lists the site as electrical services/electrical power distribution registered in the CA-CERS and CAENVIROVIEW databases. The CalEPA website lists dielectric oil and lead acid batteries as regulated chemicals stored onsite.

- **SFV (Area 1) North Hollywood Wellfield Area Burbank Operable Unit:** This site is listed in the NPL and is a 20-square-mile area of groundwater contaminated with including TCE and PCE.

- **FotoKem Film & Video/Foto-Kem Industries, Inc./Foto Tronics, 2800 West Olive Avenue (ERIS Record No. 14):** This site is listed in BURBANK CUPA, CERS HAZ, CLEANUP SITES, EMISSIONS, LA COUNTY CUPA AND RCRA SQG databases. According to the ERIS report, this site had a reported leak of volatile or semi-volatile organic compounds in January 1965 and may have affected the aquifer used for drinking water supply.

As discussed in Response 4.9(b), a Phase II ESA was prepared for the substation site, which included the collection of soil samples to determine the presence or absence of contamination in the site soil. Based on the laboratory results, no further assessment is required for the substation site.

Based on a review of the Cortese List conducted in September 2021, the proposed underground transmission cables are not located on a site which is included on a list of

hazardous materials compiled pursuant to Government Code Section 65962.5 (Department of Toxic Substances Control 2021).

Based on these considerations above, the proposed project would not create a significant hazard to the public or the environment due to location on a hazardous materials site and a less than significant impact would occur.

Mitigation Measures: No mitigation measures are necessary.

e. For a project located within an airport land use plan or, where such plan has not been adopted, within 2 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?

No Impact: The project site is not located within 2 miles of a public airport or public use airport. The nearest public airport is Bob Hope Airport, located approximately 2.6 miles north of the substation site and 2.2 miles north of the most northern extent of the proposed 69kV line on West Verdugo Avenue. Therefore, the proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area and no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact: The project site is located in a developed area and would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Although the proposed project would involve the installation of underground transmission cables within existing public roadway right-of-way, it is not anticipated that the proposed project would substantially affect any of the existing road network surrounding the project site beyond some temporary partial road closures during construction. A traffic control plan would be implemented during temporary construction activities in roadways, as such, this would be a temporary impact and the transmission cables would be located underground. Proposed development would meet all requirements for access and egress of emergency vehicles in accordance with Uniform Fire Code and City requirements. Potential impacts related to emergency and evacuation plans would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

No Impact: According to the Burbank 2035 General Plan, there are two areas within the city mapped by the Burbank Fire Department (BFD) as fire hazard zones. One zone is along the foothills of the Verdugo Mountains in the northeast part of the city and the other is in the southwestern edge of the city adjacent to an undeveloped portion of the Hollywood Hills.

According to Exhibit S-1: Fire Zones of the Burbank 2035 General Plan, the project site is not located within either of these designated wildland fire hazard areas (City of Burbank 2013a). Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires and no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

4.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
HYDROLOGY AND WATER QUALITY–Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) 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:				
i. result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii. 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; or	☐	☐	☒	☐
iv. impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Discussion

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less than Significant Impact:

Construction

Short-term impacts related to water quality would occur during the earthwork and construction phase, when the potential for erosion, siltation, and sedimentation would be the greatest. Construction of the proposed project has the potential to produce typical pollutants such as nutrients, heavy metals, pesticides and herbicides, toxic chemicals related to construction and cleaning, waste materials including wash water, paints, wood, paper, concrete, food containers, and sanitary wastes, fuel, and lubricants. Impacts to stormwater quality would occur from construction and associated earth moving, and increased pollutant loadings would occur immediately offsite.

Construction of the proposed substation would disturb approximately 0.39 acres of land surface, and thus, would not be required to obtain coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (Permit) (Order No. 2009-0009-DWP). However, the City of Burbank is located within the jurisdiction of the Regional Water Quality Control Board (RWQCB). The Los Angeles RWQCB requires all municipalities within its jurisdiction, including the City of Burbank, to comply with the water quality objectives in its Stormwater Quality Management Plan (SQMP). The SQMP is designed to ensure that stormwater produced from a proposed development does not exceed the limitation of any receiving waters and water quality standards. Under the SQMP, development projects are required to obtain permits for water pollution generated by stormwater. These permits, known as Municipal Separate Storm Sewer Systems (MS4) permits, are part of the NPDES permit program. All development projects within the County of Los Angeles are required to comply with the SQMP. In addition, the City of Burbank administers a Standard Urban Stormwater Mitigation Plan (SUSMP) ordinance to ensure new developments comply with the SQMP. The SUSMP ordinance requires new developments to implement BMPs to reduce water quality impacts to the maximum extent possible, and submit a plan to the City demonstrating how the proposed project would comply with the SUSMP and project-specific BMP implementation information. Compliance with the SQMP and SUSMP would minimize impacts to a less than significant level.

As described in Section 3.0, Project Description, trenching will be required to install underground transmission cables within existing public roadway right-of-way. In the event the project disturbs 1 acre or more of land surface, project construction would be required to comply with the NPDES Permit (Order No. 2009-0009-DWP), which requires the preparation of a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP is required to include a description of appropriate BMPs that include erosion control measures. Construction contractor(s) are responsible for implementation of the SWPPP, which includes maintenance, inspection, and repair of erosion and sediment control measures and water quality BMPs throughout the construction period. Therefore, with implementation of the required BMPs as part of a SWPPP, impacts would be less than significant.

Operations

Operation of the proposed substation would generate sources of potential stormwater pollution that are typical of industrial uses (e.g., cleaning solvents, oil and grease, trash and debris).

Stormwater runoff from precipitation events could potentially carry urban pollutants into municipal storm drains. As discussed in Response 4.9(a) above, the transformers would include oil containment basins in order to prevent potential spills from reaching storm drains. Furthermore, the proposed project would be required to comply with the SUSMP, which includes implementation of BMPs to infiltrate or treat stormwater runoff, control peak flow discharge, and reduce the post-project discharge of pollutants from stormwater conveyance systems. Compliance with these requirements would reduce potential impacts to water quality standards to less than significant.

Mitigation Measures: No mitigation measures are necessary.

b. 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?

Less than Significant Impact: According to the City's Urban Water Management Plan (2015), the City of Burbank extracts its groundwater from the San Fernando Basin (SFB). The SFB underlies the city, including the project site. The City relies heavily on groundwater sources for its water supply. The project site is currently developed and is almost entirely covered with impervious surfaces. Implementation of the proposed project would result in redevelopment of the substation site, resulting in a similar amount of impervious surfaces when compared to existing conditions. As the project site is predominantly impervious, only nominal runoff currently infiltrates into the groundwater. Thus, the proposed project would not significantly interfere with groundwater recharge or impede the sustainable groundwater management of the basin. This is considered a less than significant impact.

Mitigation Measures: No mitigation measures are necessary.

c. 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:

i. result in substantial erosion or siltation on- or off-site?

Less than Significant Impact: The project site is flat in topography. Existing runoff currently surface flows and eventually drains into existing outlets. Project implementation would result in similar drainage patterns as existing conditions, as the majority of the site would remain impervious. The proposed project would not substantially alter the existing drainage pattern of the site, resulting in substantial erosion or siltation on-site or off-site and would not alter the course of a stream or river. This is considered a less than significant impact.

Mitigation Measures: No mitigation measures are necessary.

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:

ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Less than Significant Impact: As discussed in Response 4.10(c)(i) above, existing runoff currently surface flows and eventually drains into existing outlets. Project implementation would result in similar drainage patterns as existing conditions, as the majority of the site would remain impervious. The proposed project's potential to cause flooding would be eliminated through compliance with the City's SUSMP ordinance. This ordinance would require the proposed project to implement BMPs to reduce impacts on stormwater runoff during construction to the maximum extent possible and to submit a plan to the City demonstrating how the project would comply with the SUSMP during operation. Therefore, the proposed project would not substantially alter the existing drainage pattern of the site, resulting in flooding onsite or offsite. This is considered a less than significant impact.

Mitigation Measures: No mitigation measures are necessary.

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:

iii. 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 Impact: Runoff from the project site currently is, and would continue to be, collected on the site and directed toward into existing outlets. Project implementation would result in similar drainage patterns as existing conditions, as the majority of the site would remain impervious. Therefore, the project would not create or contribute substantial additional runoff. This is considered a less than significant impact.

Mitigation Measures: No mitigation measures are necessary.

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:

iv. impede or redirect flood flows?

No Impact: According to Exhibit S-6: FEMA Flood Zone Areas of the Burbank 2035 General Plan, the project site is not located within a 100- or 500-year flood zone (City of Burbank 2013a). Therefore, the project would not impede or redirect flood flows and no impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact: According to Exhibit S-6: FEMA Flood Zone Areas of the Burbank 2035 General Plan, the project site is not located within a 100- or 500-year flood zone (City of Burbank 2013a). The project site is located approximately 15 miles east of the Pacific Ocean. Therefore, the project site would not be subject to inundation by tsunami. The potential for the site to be adversely impacted by earthquake induced seiches, is negligible due to the lack of any significant enclosed bodies of water located in the vicinity of the site. Therefore, the proposed project would not risk release of pollutants due to project inundation by flood, tsunami, or seiche and no impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact: According to the City's Urban Water Management Plan (2015), the City of Burbank extracts its groundwater from the San Fernando Basin (SFB). The SFB underlies the city, including the project site. The City relies heavily on groundwater sources for its water supply. The project site is currently developed and is almost entirely covered with impervious surfaces. Implementation of the proposed project would result in redevelopment of the substation site, resulting in a similar amount of impervious surfaces when compared to existing conditions. As the project site is predominantly impervious, only nominal runoff currently infiltrates into the groundwater. Thus, the proposed project would not significantly interfere with groundwater recharge or impede the sustainable groundwater management of the basin. This is considered a less than significant impact.

Mitigation Measures: No mitigation measures are necessary.

4.11 LAND USE AND PLANNING

		Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
LAND USE AND PLANNING – Would the project:					
a)	Physically divide an established community?	☐	☐	☐	☒
b)	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?	☐	☐	☐	☒

Discussion

a. Would the project physically divide an established community?

No Impact: The substation site is in an area that is developed primarily with commercial and medical uses. Surrounding land uses include commercial buildings to the north, medical buildings to the east and south, and medical and commercial buildings and an assisted living facility to the west. There are no established residential communities in the immediate vicinity of the project site. The nearest residential uses to the substation site are located east of South Buena Vista Street and north of West Olive Avenue. The proposed underground transmission cables would be installed from inside the substation to go across both South Naomi Street and West Willow Street in the public right-of-way past the property line and routed within public right-of-way of North and South Frederic Street, West Olive Avenue, West Verdugo Avenue, North California Street, and West Alameda Avenue. These affected roadways are adjacent to commercial, industrial, and residential uses and potential partial roadway closures may occur. However, a traffic control plan would be implemented during temporary construction activities in roadways, as such, this would be a temporary impact and the transmission cables would be located underground. Therefore, implementation of the proposed project would not physically divide an established community and no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

b. 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?

No Impact: The proposed project is consistent with the Burbank 2035 General Plan land use designation and the Burbank Zoning Code. The Burbank 2035 General Plan land use designation for the substation site and surrounding area is Media District Commercial. The Media District Commercial area is a regional employment center comprised of a variety of media-oriented and commercial uses (City of Burbank 2013a). Pursuant to Section 10-1-502 of the Burbank Municipal Code, a public utility facility is a permitted use in the Media District

General Business (MDC-3) zone. The proposed underground transmission cables would be installed underground within existing public roadway right-of-way and would not impact adjacent land uses or properties. The proposed project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. Therefore, no impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

4.12 MINERAL RESOURCES

	Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
MINERAL RESOURCES – Would the project:				
a) 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?	☐	☐	☐	☒
b) 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?	☐	☐	☐	☒

Discussion

a. 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: According to Exhibit OSC-2: Mineral Resource Zones of the Burbank 2035 General Plan, the project site is located in an area designated Mineral Resource Zone-2 (MRZ-2), which is defined as an area where mineral resources may be present (City of Burbank 2013a). However, past land use changes to accommodate planned urbanization now preclude mining activities in Burbank. Future mining activities could not occur without destroying large areas of the city. Although there is a possibility that significant mineral resources could be located with the MRZ-2 area, mining would not be feasible. Therefore, Burbank is not considered to be a potential future source of mineral resources (City of Burbank 2013a). Based on this context, the proposed project would not 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 is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

b. 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: Please refer to Response 4.12(a) above.

Mitigation Measures: No mitigation measures are necessary.

4.13 NOISE

		Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
NOISE – Would the project:					
a)	Generation of 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?	☐	☐	☒	☐
b)	Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c)	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 project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Discussion

a. Generation of 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?

Less than Significant Impact: Construction noise, although temporary, can be a source of concern for sensitive receptors, such as nearby residences. Construction is anticipated to take approximately 24 months. Construction of the project will require the use of heavy equipment that may be periodically audible at off-site locations. Received sound levels will fluctuate, depending on the construction activity, equipment type, and distance between noise source and receiver. Additionally, sound from construction equipment will vary dependent on the construction phase and the number and class of equipment at a location at any given time.

The noisiest activities for the proposed project would be during the site clearing and grading phases when graders, loaders, and dozers would be used. The construction equipment associated with these activities would generate noise levels of up to 85 dBA L_{max} at 50 feet. Although unlikely, two pieces of construction equipment could operate at their maximum noise level simultaneously. For every doubling of acoustic energy the noise level, measured in dBA, increases by 3. Therefore, two pieces of equipment, each operating at a noise level of 85 dBA, would generate a noise level of 88 dBA L_{max} at 50 feet.

In the City of Burbank, construction noise that occurs between the hours of 7 a.m. and 7 p.m. Monday through Friday and 8 a.m. to 5 p.m. on Saturday is exempt from applicable noise standards. Therefore, project-related construction activities will not expose persons in the vicinity of the proposed project site to noise levels in excess of standards established by the City.

The proposed transformers at the substation will generate only minimal operational noise and anticipated to be similar to existing operations. Operation and cooling fans may emit noticeable noise within the enclosed substation. However, no sensitive noise receptors are located immediately adjacent to the substation site. Therefore, a less than significant impact is identified for this issue area.

Mitigation Measures:

b. Generation of excessive groundborne vibration or groundborne noise levels?

Less than Significant Impact: Construction activities on the project site may produce groundborne vibration or groundborne noise levels during earthwork/grading and/or during the operation of heavy machinery. Construction activities generate groundborne vibration when heavy equipment travels over unpaved surfaces or when it is engaged in soil movement. The effects of groundborne vibration include discernible movement of building floors, rattling of windows, shaking of items on shelves or hanging on walls, and rumbling sounds. Vibration-related problems generally occur due to resonances in the structural components of a building because structures amplify groundborne vibration.

To assess potential vibration impacts from construction, this analysis used the methodology contained in Section 7.2 of the FTA manual (FTA 2018). Vibration source levels for a variety of typical construction equipment types are outlined in Table 7-4 of the FTA manual in terms of PPV in inches per second at a reference distance of 25 feet from the source (FTA 2018). For this analysis, the source of typical vibration levels for a vibratory roller was utilized. As pile driving is not required, the highest reference peak particle velocity (PPV) for the proposed project would be 0.210 inches per second (in/sec) associated with on-site vibration rollers (FTA 2018). The topography of the site is relatively flat and soils are suitable for grading; therefore, grading activities required for the project construction are not extensive and ground vibration is anticipated to be minimal. The closest sensitive receptors to the project site are residences located along North Frederic Street and North California Street at a distance of approximately 50 feet. At these locations, distance attenuation would reduce the construction vibration levels from the proposed project to 0.098 in/sec. Although perceptible, this level is far below the 0.2 in/sec threshold at which there is a risk of architectural damage to normal dwelling houses. Long-term operation of the proposed project is not anticipated to result in perceptible levels of groundborne vibration or groundborne noise. Therefore, a less than significant impact is identified for this issue area.

Mitigation Measures:

c. 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 project expose people residing or working in the project area to excessive noise levels?

No Impact: The proposed project is not located within 2 miles of a public airport, public use airport, or private airstrip. The nearest public airport is Bob Hope Airport, located approximately 2.6 miles north of the substation site and 2.2 miles north of the most northern extent of the proposed 69kV line on West Verdugo Avenue. Therefore, the proposed project would not expose people residing or working in the project area to excessive noise levels and no impact would occur.

Mitigation Measures: No mitigation measures are necessary.

4.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
POPULATION AND HOUSING – Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., by extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion

a. 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)?

No Impact: The proposed project involves the construction and operation of a substation, and installation of new underground transmission cables. The proposed project would not induce population growth as no new residential uses are proposed. Construction and operation of the proposed project would not involve a substantial number of employees. Furthermore, the proposed project would not induce growth through the development of housing or the extension or expansion of major capital infrastructure. No impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact: No housing exists on the project site. Therefore, the proposed project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement elsewhere. No impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

4.15 PUBLIC SERVICES

	Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
PUBLIC SERVICES – Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objective for any of the public services:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒

Discussion

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

i. ***Less than Significant Impact:*** Fire protection and medical response services are provided by the City of Burbank Fire Department (BFD). The BFD is a full-service fire agency that protects over 17.4 square miles, and provides a variety of services including fire suppression, emergency medical services (EMS), fire prevention, hazardous materials response, emergency preparedness, residential and commercial inspections and public education. The project site is served by BFD Station 12 located at 644 N. Hollywood Way approximately 0.83 miles to the northwest. The proposed project would not result in a change of land use and will not result in an increase of BFD services. The proposed project would be constructed pursuant to all applicable standards, thus minimizing potential adverse service calls to the site. Furthermore, the proposed project would receive adequate fire protection service and the project would not result in an increase in the need for fire protection service that would require new or significant fire facilities to be constructed. Additionally, the project would not result in an increase of residents and would not affect the ratio

of residents per fire station. Therefore, a less than significant impact is identified for this issue area.

ii. ***Less than Significant Impact:*** Police protection is provided by Burbank Police Department. The Burbank Police Station is located at 200 N Third Street, roughly 2.11 miles east from the substation. The proposed project would not result in a change of land use and would not result in an increase of Burbank Police Department services. The proposed project would not result in an increase of residents, which would affect the ratio of residents per police station. The proposed project includes a block wall along the perimeter of the project site. The wall would deter unauthorized persons from the substation site. Therefore, the proposed project is not anticipated to result in an increase in the need for police protection that would require new or significant police facilities to be constructed. A less than significant impact is identified for this issue area.

iii. ***No Impact:*** Burbank Unified School District provides school services for the City of Burbank. The proposed project does not include the development of residential land uses that would result in an increase in population or student generation. Therefore, no impact is identified for this issue area.

iv. ***No Impact:*** Because no residential uses are proposed, the proposed project would not increase population, generating an increase in demand on existing public or private parks or other recreational facilities that would either result in or increase physical deterioration of the facility. Therefore, no impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

4.16 RECREATION

	Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
RECREATION – Would the project:				
a) 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?	☐	☐	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion

a. 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?

No Impact: The proposed project is the construction and operation of a substation and installation of new underground transmission cables within public roadway right-of-way. Development of housing is not proposed as part of the project. The proposed project would not increase population, generating an increase in demand on existing public or private parks or other recreational facilities that would either result in or increase physical deterioration of the facility. Therefore, no impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

b. 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?

No Impact: The proposed project is the construction and operation of a substation and installation of new underground transmission cables within public roadway right-of-way. The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

4.17 TRANSPORTATION

	Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
TRANSPORTATION– Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

Discussion

a. 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 Impact: The proposed project would result in a minor increase in vehicular trips associated with the arrival of construction workers to the site. The proposed project would require no more than 15 on-site workers on any given day during the construction period. It is anticipated that there would be a maximum of 15 cars traveling back and forth to and from the project site during the 24-month construction period. These trips would be temporary and short-term during project construction. Furthermore, with the completion of project construction, the impact to the area in regard to traffic is negligible because the new substation is not a destination for any reason other than maintenance. Once the proposed project is constructed, approximately two to four workers would be entering the substation site for maintenance activities a couple times a year, and one to two workers would be conducting monthly inspections of the facility. Thus, the proposed project would not substantially increase traffic conditions during construction and operation of the proposed project.

The existing surrounding circulation network would not change with the implementation of the proposed project. Where trenching may occur, temporary detours would be implemented as needed to maintain proper vehicle, bicycle and pedestrian access. As such, the proposed project would not conflict with any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance of safety of such facilities. Therefore, a less than significant impact is identified for this issue area.

Mitigation Measures:

b. Would the project conflict with or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less than Significant Impact: Section 15064.3(b) of the CEQA Guidelines provides guidance on determining the significance of transportation impacts and focuses on the use of vehicle miles traveled (VMT), which is defined as the amount and distance of automobile travel associated with a project.

The proposed project would result in a minor increase in vehicular trips associated with the arrival of construction workers to the substation site. The proposed project would require no more than 15 on-site workers on any given day during the construction period. It is anticipated that there would be a maximum of 15 cars traveling back and forth to and from the project site during the 24-month construction period. These trips would be temporary and short-term during project construction. Furthermore, with the completion of project construction, the impact to the area in regard to traffic is negligible because the substation project is not a destination for any reason other than maintenance. Once the proposed project is constructed, approximately two to four workers would be entering the substation site for maintenance activities a couple times a year, and one to two workers would be conducting monthly inspections of the substation. These activities would generate a negligible number of new vehicle trips with no notable growth in VMT. The transportation impact under State CEQA Guidelines section 15064.3(b) would be less than significant.

Mitigation Measures: No mitigation measures are necessary.

c. 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 Impact: No public roadways are proposed as part of the proposed project. As shown in Figure 3, a 20-foot-wide driveway is proposed along South Naomi Street and another 20-foot-wide driveway is proposed along West Willow Street in order to accommodate vehicular access to the substation. All improvements planned as part of the proposed project would be in conformance with applicable standards set by the City. Furthermore, there are no incompatible uses in the vicinity that could result in any hazardous conditions. Therefore, a less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

d. Would the project result in inadequate emergency access?

Less than Significant Impact: The project would not result in inadequate emergency access. As shown in Figure 3, a 20-foot-wide driveway is proposed along South Naomi Street and another 20-foot-wide driveway is proposed along West Willow Street in order to accommodate

vehicular access to the substation. The proposed driveways would be required to meet standards imposed by the BFD. Therefore, a less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

4.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
TRIBAL CULTURAL RESOURCES – 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:				
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)?	☐	☐	☐	☒
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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☒	☐	☐

Discussion

a. 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)?***

No Impact: No known tribal cultural resources have been identified on-site, including historical tribal cultural resources pursuant to Public Resources Code Section 5020.1(k), otherwise defined as listed in a local register of historical resources. Therefore, no impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

b. 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:

- ***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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?***

Less than Significant with Mitigation Incorporated: AB 52 was passed in 2014 and took effect July 1, 2015. It established a new category of environmental resources that must be considered under CEQA called tribal cultural resources (Public Resources Code 21074) and established a process for consulting with Native American tribes and groups regarding those resources. AB 52 requires a lead agency to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.

In accordance with AB 52, the City sent an invitation to consult under AB 52 (PRC 21080.3.1) on August 24, 2021, to Native American tribes who had requested to be informed by the City as the lead agency through formal notification of proposed projects in traditionally and culturally affiliated geographic areas. The Fernandeño Tatavium Band of Mission Indians requested consultation and the City consulted with the tribe on September 14, 2021. The Gabrieleno Band of Mission Indians – Kizh Nation requested consultation and the City consulted with the tribe on September 28, 2021.

Representatives of the Kizh Nation indicated that the project area is included in the Kizh Nation ancestral area and expressed concerns regarding the potential to encounter unknown TCRs (including artifacts, ancestral human remains, and/or grave goods) within the project site during excavation. Given that no cultural resources have been reported within the project site and the project site has been substantially disturbed by grading activities associated with previous development of the substation and roadways, it is not anticipated that implementation of the proposed project would cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC 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. However, Mitigation Measure TCR-1 will require the City to make the project site available to native tribe(s) that have ancestral ties to the region during ground disturbance activities for voluntary monitoring on their own behalf, if requested. It also allows the native tribes to conduct a voluntary Native American Indian Sensitivity Training on their own behalf, if requested, for construction personnel. Further, Mitigation Measure TCR-1 identifies the protocols that must be taken in the event that tribal

cultural resources are inadvertently discovered during ground disturbing activities, such as halting of work within 60 feet of the find until it can be evaluated by a qualified archaeologist, and consultation with tribal groups on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities. With implementation of Mitigation Measure TCR-1, This potential impact would be less than significant with implementation of Mitigation Measure TCR-1.

Mitigation Measures:

TCR-1 The City shall be required to make the project site available to native tribe(s) that have ancestral ties to the region during ground disturbance activities for voluntary monitoring on their own behalf, if requested, including the Gabrieleño Band of Mission Indians Kizh Nation, the Fernandeño Tataviam Band of Mission Indians, and any other tribe with ancestral ties to the region, as established by the Native American Heritage Commission.

Prior to the issuance of a demolition or grading permit(s), the Native American tribe(s) can conduct a voluntary Native American Indian Sensitivity Training on their own behalf, if requested, for construction personnel. The training session can include a handout and focus on how to identify Native American resources encountered during earthmoving activities and the procedures followed if resources are discovered.

In the event that tribal cultural resources are inadvertently discovered during ground disturbing activities, work must be halted within 60 feet of the find until it can be evaluated by a qualified archaeologist retained by the City. The qualified archaeologist shall meet the Secretary of the Interior's Professional Qualification Standards for archaeology to determine if the potential resource meets the CEQA definition of historical (State CEQA Guidelines 15064.5(a)) and/or unique resource (Public Resources Code 21083.2(g)). The City shall, in good faith, consult with the consulting tribal groups (the Gabrieleño Band of Mission Indians-Kizh Nation and the Fernandeño Tataviam Band of Mission Indians) on the disposition and treatment of any Tribal Cultural Resource encountered during all ground disturbing activities. Construction activities can continue in other areas. If the find is considered an "archeological resource" the qualified archaeologist shall pursue either protection in place or recovery, salvage and treatment of the deposits. Recovery, salvage, and treatment protocols shall be developed in accordance with applicable provisions of Public Resource Code Section 21083.2 and State CEQA Guidelines 15064.5 and 15126.4. If a tribal cultural resource cannot be preserved in place or left in an undisturbed state, recovery, salvage, and treatment shall be required at the City's expense. All recovered and salvaged resources shall be prepared to the point of identification and permanent preservation in an established accredited professional repository.

4.19 UTILITIES AND SERVICE SYSTEMS

		Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
UTILITIES AND SERVICE SYSTEMS – Would the project:					
a)	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?	☐	☐	☒	☐
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c)	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?	☐	☐	☒	☐
d)	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?	☐	☐	☒	☐
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Discussion

a. 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?

Less than Significant Impact: The project site is located in an urbanized area with adequate water, wastewater treatment, storm water drainage, electric power, natural gas, and telecommunications facilities. The proposed project involves the demolition of the existing substation with a new substation on the same site. The new substation would result in a similar demand for utilities and service systems as the existing substation. The proposed project would not require the construction or relocation of new water, wastewater treatment, storm water drainage, natural gas, or telecommunications facilities.

The proposed project would involve installation of new underground transmission cables within public roadway right-of-way and would be located within developed areas that already contain existing overhead and underground transmission and distribution lines. The proposed project would not otherwise generate additional demand resulting in the construction or relocation of new power electric power facilities. Therefore, a less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less than Significant Impact: A significant impact would occur if the proposed project would increase water consumption to such a degree that new water sources would need to be identified. In June 2016, BWP adopted a 2015 Urban Water Management Plan, which documents projected population growth through 2040 and the availability of water to serve that population. BWP's potable water supply is composed of surface water resources provided by the Metropolitan Water District (MWD) and groundwater resources. MWD stated, through its 2015 UWMP, that is has adequate supplies for its service area through 2040 (BWP 2016). The proposed project would not induce population growth as no new residential uses are proposed. Therefore, the proposed project would not require new and expanded entitlements. During operations, the substation would require limited water resources for the maintenance of perimeter landscaping and for the restroom facility. Therefore, a less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

c. 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?

Less than Significant Impact: The proposed project involves the demolition of the existing substation with a new substation on the same site. The new substation would result in a similar demand for wastewater treatment as the existing substation. The proposed project would not induce population growth as no new residential uses are proposed. Therefore, the proposed project would not require new and expanded entitlements. Therefore, a less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

d. 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?

Less than Significant Impact: During construction of the proposed project, solid waste generation would be minor. Due to the minimal amount of workers required to operate and maintain the facility, a nominal amount of solid waste is anticipated during operation of the proposed project. The City of Burbank owns and operates the Burbank Landfill Site No. 3, and sufficient capacity exists to accommodate the proposed project. According to the California Department of Resources Recycling and Recovery (CalRecycle), the Burbank Landfill has a remaining capacity of 5,174,362 cubic yards and a closure date of 2053 (CalRecycle 2021). As such, there is sufficient permitted capacity to accommodate the amount of waste associated with the project. Therefore, a less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less than Significant Impact: During construction and operation of the proposed project, solid waste generation would be minor. The proposed project would continue to comply with federal, state and local regulations related to solid waste and recycling. A less than significant impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

4.20 WILDFIRE

		Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b)	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?	☐	☐	☐	☒
c)	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?	☐	☐	☐	☒
d)	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?	☐	☐	☐	☒

Discussion

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact: According to the Draft Fire Hazard Severity Zone Map for Los Angeles County prepared by the California Department of Forestry and Fire Protection, the project site is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2007). Therefore, the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. No impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

b. 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?

No Impact: The project site is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2007). Therefore, the proposed project would not exacerbate wildfire risks. No impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

c. 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?

No Impact: The project site is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2007). The proposed project would result in fire risk that would be comparable to that of the existing substation that is being replaced. The substation site would continue to be adequately supported by the existing fire protection services. In addition, operation and maintenance would not affect the ability of fire personnel to respond to fires. The proposed project would not exacerbate fire risk. No impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

d. 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?

No Impact: The project site is not located in or near state responsibility areas or lands classified as very high hazard severity zones (California Department of Forestry and Fire Protection 2007). The proposed project would not 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. No impact is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

		Potentially Significant Impact	Less than Significant w/ Mitigation Incorporated	Less than Significant Impact	No Impact
MANDATORY FINDINGS OF SIGNIFICANCE					
a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b)	Does the project have impacts that are individually limited, but cumulatively considerable ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c)	Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Discussion

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

***Less than Significant Impact with Mitigation*:** As discussed in Response 4.4(a), due to the developed nature of the project site, the proposed project would not impact any habitat that supports species identified as candidate, sensitive or special status in local, regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. However, the project involves the removal of one tree on West Willow Street and trimming a neighboring property tree. Construction and tree removal during the breeding season for migratory birds (February 1 – August 31), have the potential to impact bird species

protected under the Migratory Bird Treaty Act. However, implementation of Mitigation Measure BIO-1 would ensure that this potential impact would be reduced to a level less than significant.

As discussed in Responses 4.5(a)-(c), the proposed project would not result in significant impacts to cultural resources. Therefore, the proposed project would not eliminate examples of the major periods of California history or prehistory.

Mitigation Measures: Mitigation Measure BIO-1.

b. Does the project have impacts that are individually limited, but cumulatively considerable ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less than Significant Impact: Based on the analysis contained in this Initial Study, the proposed project would not result in significant impacts to aesthetics, agricultural and forestry resources, air quality, cultural resources, geology and soils, greenhouse gas emissions, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, and utilities and service systems.

Mitigation measures for biological resources, hazards and hazardous materials and tribal cultural resources would reduce potential impacts to a level less than significant.

The proposed project could incrementally contribute to cumulative impacts for projects occurring within the vicinity of the project. However, implementation of mitigation measures would ensure that no residually significant impacts would result with implementation of the project either directly or indirectly. In the absence of residually significant impacts, the incremental accumulation of effects would not be cumulatively considerable. Therefore, a finding of less than significant is identified for this issue area.

Mitigation Measures: No mitigation measures are necessary.

c. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact: Based on the analysis contained in this Initial Study, all impacts related to the proposed project would be reduced to a level less than significant with implementation of mitigation measures. There would not be any long-term environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly. Any effects related to construction of the proposed project would be temporary and short-term (a matter of months while the project is constructed) and would not result in any long-term or permanent effects on human beings. Any environmental effects would be less than significant, as noted in the prior sections of this Initial Study.

Mitigation Measures: No mitigation measures are necessary.

5.0 REFERENCES

The following documents and information were used in the preparation of this Initial Study:

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