



7.0 Alternatives to the Proposed Project



7.0 ALTERNATIVES TO THE PROPOSED PROJECT

Under CEQA, the identification and analysis of alternatives to a project is a fundamental part of the environmental review process. CEQA Public Resources Code §21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project’s significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, “the purpose of an environmental impact report is ... to identify alternatives to the project.”

Direction regarding the definition of project alternatives is provided in the CEQA Guidelines as follows:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.¹

The CEQA Guidelines emphasize that the selection of project alternatives be based primarily on the ability to reduce significant effects relative to the proposed project, “even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.”² The CEQA Guidelines further direct that the range of alternatives be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are addressed.³

In selecting project alternatives for analysis, potential alternatives must pass a test of feasibility. CEQA Guidelines §15126.6(f)(1) states that:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site...

Beyond these factors, CEQA Guidelines require the analysis of a “no project” alternative and where the project approvals seek an amendment to the local general plan, an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.⁴ In addition, CEQA Guidelines §15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible and discuss the reasons for their rejection.

To provide background regarding the selection or rejection of a Project alternative, the discussion below provides a summary of Project objectives, in addition to a description of the significant and unavoidable impacts found to occur upon Project implementation. An explanation behind each selected Project alternative is provided, in addition to a discussion of alternatives that were considered during the scoping process but not selected for further analysis, if any.

¹ CEQA Guidelines §15126.6(a).

² CEQA Guidelines §15126.6(b).

³ CEQA Guidelines §15126.6(f).

⁴ CEQA Guidelines §15126.6(e)(2).



Throughout the following analysis, impacts of the alternatives are analyzed for each of the issue areas examined in [Section 5.0](#) of this EIR. In this manner, each alternative can be compared to the proposed action on an issue-by-issue basis.

[Table 7-1, Comparison of Alternatives](#), which is provided at the end of this section, provides an overview of the alternatives analyzed and a comparison of each alternative's impact in relation to the proposed action.

7.1 SUMMARY OF PROJECT OBJECTIVES

As stated above, an EIR must only discuss in detail an alternative that is capable of feasibly attaining most of the basic objectives associated with the action, while at the same time avoiding or substantially lessening any of the significant effects associated with the proposed Project. Thus, the Project's objectives, as provided within [Section 3.0, Project Description](#), are provided below:

- Convert an existing vacant land parcel to a commercial office building consistent with existing uses on the office campus;
- Utilize proximity to multiple transit options including Metrolink, MTA, Amtrak and the Hollywood-Burbank Airport to provide office tenants a diverse set of public transportation options to the Project site;
- Continue to promote sustainability efforts within the Golden State District through the implementation of Burbank Water and Power reclaimed water for irrigation and cooling towers, energy efficiency and green cleaning programs; and
- Create a new access point to the existing subterranean parking structure enabling access from the west side of the existing office campus.

7.2 SUMMARY OF SIGNIFICANT IMPACTS

The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making. The range of potential alternatives to the proposed Project shall also include those that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant effects. Among the factors that may be considered when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, General Plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent). Only locations that would avoid or substantially lessen any of the Project's significant effects need be considered for inclusion. An alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative need not be considered.

Only those impacts found significant and unavoidable are relevant in making the final determination of whether an alternative is environmentally superior or inferior to the proposed Project. Based on the analysis provided within [Section 5.0](#) of this EIR, the proposed Project would result in significant and



unavoidable traffic/transportation impacts at the intersection of Hollywood Way and North Avon Street (Intersection No. 3) and the intersection of Hollywood Way and Victory Avenue (Intersection No. 8) due to the addition of Project-generated trips.

7.3 ALTERNATIVES CONSIDERED BUT REJECTED

In accordance with CEQA Guidelines §15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to CEQA Guidelines, among the factors that may be used to eliminate alternatives from detailed consideration are the alternative's failures to meet most of the basic Project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. The following possible alternative was considered but not carried forward for additional analysis, since it was considered economically infeasible.

“REDUCED DENSITY” ALTERNATIVE

A Reduced Density Alternative would reduce the Project's development potential to less than 160,447 adjusted gross square feet for PD 89-7. As detailed in [Section 3.2, *Background and History*](#), since approval in 1991, PD 89-7 has undergone several modifications, and now permits a total of 783,000 adjusted gross square feet of commercial office space throughout the PD 89-7 area. Currently, PD 89-7 is developed with four office buildings, totaling 622,553 adjusted gross square feet. Thus, approximately 160,447 adjusted gross square feet remains under the approved PD 89-7. A Reduced Density Alternative with development potential less than 160,447 adjusted gross square feet would not be economically feasible and therefore would likely result in no new development within the site. If no new development were to occur the current vacant, partially excavated site would remain and the project objectives would not be fulfilled. As such, this Alternative was considered but rejected from further environmental analysis.

7.4 “NO PROJECT/NO DEVELOPMENT” ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The No Project/No Development Alternative assumes the proposed Media Studios Project would not be approved. Specifically, the proposed amendment to extend the Development Agreement for PD 89-7 an additional ten years and development of the remaining entitled 160,447 adjusted gross square feet of PD 89-7 on the Phase 6 site would not occur. The proposed 160,447-adjusted gross square foot office building, new entryway along North Avon Street, and 162 subterranean parking spaces would not be constructed. The Phase 6 site would remain in its current condition as a vacant, partially excavated site with a gravel/asphalt ramp and surface parking lot with vegetation covering the existing hillside. No other uses would be developed on the Phase 6 site, including the proposed Project.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Air Quality

This Alternative would not result in any construction activities; thus, the Project's short-term construction emissions would not occur. The Project's less than significant impacts related to operational emissions of



reactive organic gases (ROG), nitrous oxides (NO_x), carbon monoxide (CO), sulfuric oxides (SO_x), and particulate matters (PM₁₀ and PM_{2.5}) generated by mobile, area, and energy sources and localized emissions would not result. In addition, although the Project would result in less than significant impacts related to health risk from diesel particulate matter (DPM) emissions, as this Alternative would not place employees within 500 feet of the rail alignment. The No Project/No Development Alternative would be environmentally superior to the proposed Project regarding air quality emissions, given it would avoid the Project's construction emissions and operational emissions.

Greenhouse Gas Emissions

GHG emissions impacts associated with the Project would be less than significant. However, given that no development would occur under this Alternative, all Project-generated GHG emissions from direct sources (i.e., construction emissions and area and mobile sources) and indirect sources (i.e., energy consumption, solid waste, and water demand) would not occur. Additionally, applicable GHG reduction plans, policies, and/or regulations would not apply to this Alternative because no new development would occur. Thus, the No Project/No Development Alternative would be environmentally superior to the proposed Project regarding GHG emissions.

Noise

The proposed Project would result in less than significant short-term construction noise and vibration impacts with compliance with the *City of Burbank Municipal Code* and applicable best management practices. Project-related long-term mobile and stationary noise impacts would also be less than significant. Further, the Project's proximate location to the Hollywood-Burbank Airport (Burbank Airport) would not conflict with the Burbank Airport's airport influence area.

Under this Alternative, short-term and operational (stationary and mobile) noise impacts would not occur, as no new development would result. Similarly, this Alternative also would not conflict with the Burbank Airport's airport influence area. When compared to the proposed Project, the No Project/No Development Alternative would be environmentally superior regarding noise impacts.

Transportation/Traffic

Future Base (2028) and Future With Project traffic conditions were evaluated in the *Traffic Impact Study for the Media Studios Office Project* (Traffic Study) and summarized in [Section 5.4, Transportation/Traffic](#); refer to [Appendix E, Traffic Study](#). Future With Project traffic conditions would result in the following four deficient intersections:

- North Hollywood Way and Winona Avenue (Intersection No. 1)
- North Hollywood Way and Thornton Avenue (Intersection No. 2)
- North Hollywood Way and North Avon Street (Intersection No. 3)
- North Hollywood Way and Victory Boulevard (Intersection No. 8)

Implementation of recommended mitigation measures under the proposed Project would reduce Project impacts to Intersections No. 1 and 2, but significant and unavoidable impacts to Intersections No. 3 and 8 would remain. Freeway ramp queueing analysis for the Project concluded that one ramp, North



Hollywood Way and I-5 Southbound Off-Ramp (Intersection No. 21), would experience queuing greater than the available storage under Future Plus Project conditions.

Under the No Project/No Development Alternative, no new development would occur and the Future Base (2028) condition analyzed in the Traffic Study would likely occur. No construction-related traffic would occur as no development is anticipated. Under operational conditions, all study intersections are expected to operate at level of service (LOS) D or better under Future Base (2028) conditions with the exception of the following nine deficient intersections:

- North Hollywood Way and Winona Avenue (Intersection No. 1)
- North Hollywood Way and Thornton Avenue (Intersection No. 2)
- North Hollywood Way and Victory Boulevard (Intersection No. 8)
- North Hollywood Way and Burbank Boulevard (Intersection No. 9)
- North Hollywood Way and Magnolia Boulevard (Intersection No. 10)
- North Hollywood Way and Verdugo Avenue (Intersection No. 11)
- North Hollywood Way and West Alameda Avenue (Intersection No. 12)
- North Buena Vista Street and North San Fernando Boulevard (Intersection No. 13)
- West Burbank Boulevard and Victory Boulevard (Intersection No. 19)

Since no development is proposed, no potential mitigation measures would be implemented to improve the aforementioned nine deficient intersections. Additionally, Future Base (2028) conditions would also result in a freeway ramp queuing impact at North Hollywood Way and I-5 Southbound Off-Ramp (Intersection No. 21), similar to the Future With Project condition.

Comparing the Future Base (2028) traffic conditions to Future With Project conditions with implementation of mitigation measures, the No Project/No Development Alternative would not result in any construction-related traffic but would result in more deficient intersections. This is because the roadway improvements required as mitigation measures under the proposed Project would not occur under this Alternative.

Thus, the No Project/No Development Alternative would be environmentally inferior to the proposed Project regarding traffic and circulation and significant and unavoidable roadway intersection impacts would remain.

ABILITY TO MEET PROJECT OBJECTIVES

The No Project/No Development Alternative would not meet any of the Project objectives. The Phase 6 site would not be developed into a commercial office building and the proposed entryway along North Avon Street into the Media Studios subterranean parking garage would not be constructed. Since no development would occur, this Alternative would not maximize its proximity to multiple transit options to future office tenants nor would it promote sustainability efforts within the Golden State District through water and energy efficiency programs.



7.5 “PHASE 9 DEVELOPMENT” ALTERNATIVE

DESCRIPTION OF ALTERNATIVE

The “Phase 9 Development” Alternative would develop the remaining 160,447 adjusted gross square feet of entitlements among two sites within the Media Studios campus, the Phase 6 and Phase 9 sites. The Phase 6 site is the same site proposed for development under the proposed Project along North Avon Street. The Phase 9 site is approximately 1.73 acres and located within PD 89-7 of the Media Studios campus at the northwest intersection of North Ontario Street and Empire Avenue; refer to [Exhibit 7-1, Phase 9 Development Alternative](#). The Phase 9 site is currently developed with an existing surface parking lot with ornamental trees along the eastern and southern perimeter. Similar to the proposed Project, this Alternative would amend the Development Agreement for PD 89-7 to extend the term ten additional years. However, this Alternative would develop the Phase 6 site as a 70,447-adjusted gross square foot office building and the Phase 9 site as a 90,000-adjusted gross square foot office building.

The proposed development on the Phase 6 site would be a three-story office building with one level of subterranean parking while the proposed structure on the Phase 9 site would similarly be a three-story office building with two levels of subterranean parking. The proposed buildings would be designed as steel frame buildings with contemporary design exteriors consistent with the existing Media Studios commercial office buildings. Both buildings would tie into the existing Media Studios campus’ landscaping, amenities, and parking facilities.

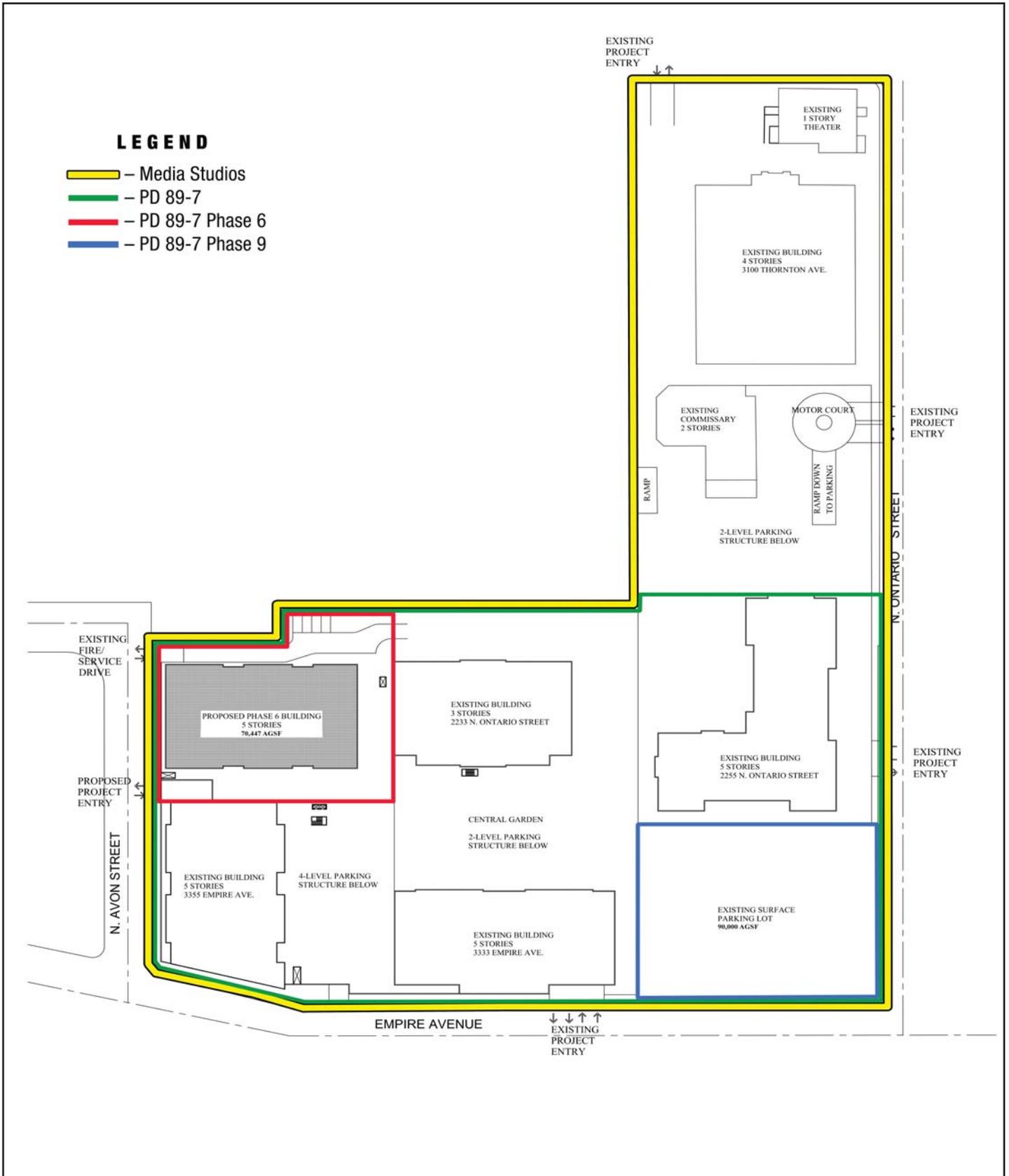
Similar to the proposed Project, a new entryway would be provided to the Phase 6 site from North Avon Street, that would connect to the existing subterranean parking garage on-site. No new entryways are proposed for the Phase 9 site. Parking for the two proposed office buildings would also be accessible from all existing driveways along Thornton Avenue, North Ontario Street, and Empire Avenue.

On the Phase 6 site, a one-level subterranean parking area would be developed with 162 parking spaces. The Phase 9 site would include two levels of subterranean parking with 133 spaces, replacing the 133 spaces provided from the existing surface parking lot. The subterranean parking levels proposed on the Phase 6 and 9 sites would connect to all underground parking areas on campus and would be accessible from any vehicular entrance.

IMPACT COMPARISON TO THE PROPOSED PROJECT

Air Quality

Construction activities associated with this Alternative would require demolition of the existing gravel/asphalt ramp and surface parking lot on the Phase 6 site and surface parking lot on the Phase 9 site, and construction of a commercial office building on each site. Construction emissions would generally be similar to the proposed Project. However, the Phase 9 site is located adjacent to single- and multi-family residences to the east of North Ontario Street. Thus, short-term construction emissions generated at the Phase 9 site construction would have a slightly greater impact on sensitive receptors than the proposed Project, which would only develop the Phase 6 site.



Source: Dave Thomsen Enterprises, LP; August 14, 2012.

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MEDIA STUDIOS PROJECT ENVIRONMENTAL IMPACT REPORT

Phase 9 Development Alternative

Exhibit 7-1



Long-term operational emissions associated with this Alternative would be similar to the proposed Project but generated on two sites within the Media Studios campus. Similar to the proposed Project, this Alternative would generate area source emissions (i.e., architectural coatings, consumer products, and landscape maintenance equipment), energy source emissions (i.e., electrical energy and natural gas), and mobile source emissions (i.e., motor vehicles) typical of commercial office buildings.

As previously stated, the Phase 9 site is adjacent to single- and multi-family residences east of North Ontario Street. Thus, this Alternative's localized construction and operational emissions would be slightly greater than the proposed Project. This Alternative would also have a slightly greater health risk associated with toxic air contaminants and diesel particulate matter coming from the Southern California Regional Rail Authority railway located approximately 340 feet south of the Phase 9 site (compared to 440 feet south of the Phase 6 site).

Overall, this Alternative would be environmentally inferior to the proposed Project for both construction and operational activities.

Greenhouse Gas Emissions

This Alternative would develop two smaller office buildings on the Phase 6 and 9 sites compared to one larger office building on the Phase 6 site under the proposed Project. Construction-related GHG emissions are anticipated to be similar under both scenarios. Operational GHG emissions associated with area, mobile, and indirect (e.g., energy, solid waste, and water demand) sources would also be similar to the proposed Project. Area sources include landscape maintenance equipment, such as lawnmowers, shredders/grinders, blowers, and trimmers, which would be the same under both the Project and this Alternative. Similarly, mobile source GHG emissions associated with daily vehicle trips generated would be the same. Further, the proposed Project and this Alternative would similarly be consistent with the California Air Resources Control Board's Scoping Plan, the Southern California Association of Governments' 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, and the Burbank2035 Greenhouse Gas Reduction Plan. This Alternative would be considered neither environmentally superior nor inferior to the proposed Project in this regard.

Noise

Under this Alternative, short-term construction noise and vibration impacts would be slightly greater than the proposed Project due to the construction activities associated with the Phase 9 site. The Phase 9 site is located adjacent to single- and multi-family residences east of North Ontario Street, and thus, any development on the site would generate noise and vibration impacts to these sensitive receptors. Construction noise and vibration impacts on the Phase 6 site would be similar under both the Project and this Alternative.

Long-term operational noise impacts associated with mobile and stationary sources would generally be similar. For example, average daily trips generated under this Alternative would be the same as the Project, but trip distribution would slightly differ as trips would either go towards/away the new entryway along North Avon Street on the Phase 6 site or towards/away the existing entryway along North Ontario Street near the Phase 9 site. The slight difference in trip distribution may slightly increase impacts to residences east of the Phase 9 site. Long-term stationary noise impacts associated with heating, ventilation, and air conditioning (HVAC) units, and underground parking areas would be similar. Given



that the existing surface parking lot on the Phase 9 site would be redeveloped as a subterranean lot, noise generated by vehicles entering and leaving the Phase 9 site may be slightly reduced under this Alternative. Thus, long-term operational noise impacts under this Alternative would balance out and be similar to the proposed Project.

Since this Alternative would result in greater construction noise in proximity to sensitive receptors, it would be considered environmentally inferior to the proposed Project in this regard.

Transportation/Traffic

Under this Alternative, construction and operational traffic impacts would be similar to the proposed Project. While construction activities would generate trips to and from the Phase 6 and 9 sites, the distribution of construction-related trips would not result in a greater or lesser impact to local roadways when compared to that of the proposed Project. Similarly, while operational average daily trips under both scenarios would be the same, trip distribution would slightly differ as some trips would go towards/away the Phase 6 site via a new entryway along North Avon Street or towards/away the Phase 9 site via an existing entryway along North Ontario Street. The slight difference in trip distribution may slightly increase traffic impacts along North Ontario Street and at the intersection of North Ontario Street and Empire Avenue near the Phase 9 site; however, it would also slightly decrease traffic impacts along North Avon Street and the intersection of North Avon Street and Empire Avenue near the Phase 6 site. Thus, operational traffic impacts would be similar to the Project and the Phase 9 Alternative would not likely eliminate the significant unavoidable impacts identified with the proposed Project.

Further, this Alternative and the proposed Project would similarly have no impacts to congestion management program arterial and freeway monitoring stations; would not result in inadequate emergency access; and would not significantly impact multimodal transportation plans. The Phase 9 Development Alternative would be considered neither environmentally superior nor inferior to the proposed Project in this regard.

ABILITY TO MEET PROJECT OBJECTIVES

The Phase 9 Development Alternative would meet all the Project objectives. This Alternative would extend the existing development agreement and develop the remaining 160,447-adjusted square feet currently entitled on the site. The proposed entryway along North Avon Street to the existing subterranean parking garage would also be constructed, enabling access from the west side of the Media Studios campus. Additionally, construction and operations of the two office buildings would implement water- and energy-efficient features associated with Golden State District. Development of this Alternative would also provide future office tenants with a diverse set of public transportation options, including Metrolink, MTA, Amtrak, and the Burbank Airport. Overall, all Project objectives would be met under this Alternative.

7.6 “ENVIRONMENTALLY SUPERIOR” ALTERNATIVE

The determination of an environmentally superior alternative is based on the consideration of how the alternative fulfills the Project objectives and how the alternative either reduces significant, unavoidable impacts or substantially reduces the impacts to the surrounding environment. As stated above, CEQA Guidelines §15126.6(e), “No Project” Alternative, indicates that “if the environmentally superior



alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”

Table 7-1, *Comparison of Alternatives*, provides a comparison of the alternatives to the proposed Project. Based on the analysis provided above, the No Project/No Development Alternative is the environmentally superior alternative because it would avoid or lessen most the impacts associated with development of the proposed Project.

**Table 7-1
Comparison of Alternatives**

Sections	Proposed Project	No Project/ No Development Alternative	Phase 9 Development Alternative
Air Quality	LTS	∇	▲
Greenhouse Gas Emissions	LTS	∇	=
Noise	LTS	∇	▲
Transportation/Traffic	S/U	▲	=
Notes: LTS = less than significant; LTS/M = less than significant with mitigation incorporated; S/U = significant and unavoidable ▲ Indicates an impact that is greater than the proposed Project (environmentally inferior). ∇ Indicates an impact is less than the proposed Project (environmentally superior). = Indicates an impact that is equal to the proposed Project (neither environmentally superior nor inferior). * Indicates a significant and unavoidable impact.			

As discussed above, if the “No Project” Alternative is identified as the environmentally superior alternative, an environmentally superior alternative must also be selected amongst the other alternatives. Accordingly, the Phase 9 Development Alternative is identified as the environmentally superior alternative among the other alternatives and is discussed below.

In comparison to the proposed Project, the Phase 9 Development Alternative would increase air quality and noise impacts but would have similar impacts to GHG emissions and transportation/traffic. The Phase 9 Development Alternative would meet all the Project objectives. This Alternative would develop a 70,447-adjusted gross square foot office building on the Phase 6 site and a 90,000-adjusted gross square foot office building on the Phase 9 site. The proposed entryway along North Avon Street to the existing subterranean parking garage would also be constructed, enabling access from the west side of the Media Studios campus. Additionally, construction and operations of the two office buildings would implement water- and energy-efficient features associated with Golden State District. Development of this Alternative would also provide future office tenants with a diverse set of public transportation options, including Metrolink, MTA, Amtrak, and the Burbank Airport. Overall, all Project objectives would be met under this Alternative. It should also be noted that the Phase 9 Development Alternative is consistent with the original PD 89-7 approval that allows the placement of allowable FAR anywhere within the PD 89-7 area.