CITY OF GLENDALE, CALIFORNIA
REPORT TO THE:

Joint ☐ City Council ☑ Housing Authority ☐ Successor Agency ☐ Oversight Board ☐

December 10, 2013

AGENDA ITEM

"The Link" Project – 3901 – 3915 San Fernando Road: Certification of the EIR, Approval of Stage II Design, Sign Program, and Conditional Use Permit

1) Council Resolution Certifying that the County has Reviewed and Considered the Information in the Final Environmental Impact Report for the Proposed "LINK" Project, Making Certain Findings and Determinations Regarding the Environmental Effects of the Project, and Adopting a Statement of Overriding Considerations
2) Motion to Approve Stage II Design
3) Motion to Approve a Sign Program
4) Motion to Approve the Conditional Use Permit

COUNCIL ACTION

Public Hearing [X] Ordinance [ ] Consent Calendar [ ] Action Item [X] Report Only [ ]

Approved for 12/10/2013 calendar

ADMINISTRATIVE ACTION

Submitted by:
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Prepared by:
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Approved by:
Scott Ochoa, City Manager

Reviewed by:
Yasmin Beers, Assistant City Manager
Michael J. Garcia, City Attorney
Timothy Foy, Deputy Director of Planning and Neighborhood Services
Alan Loomis, Principal Urban Designer
Allen Castillo, Senior Development Officer

Signature
RECOMMENDATION

Staff recommends that the City Council certify the Project's Final Environmental Impact Report (FEIR) and adopt the motions approving the Stage II Design, Sign Program, and Conditional Use Permit.

BACKGROUND / ANALYSIS

EXISTING CONDITIONS

The subject site is a 45,788 SF (1.05-acres) property consisting of four adjoining lots located at the northwest corner of Central Avenue and San Fernando Road. Two of the four lots are developed with commercial buildings. Both buildings were constructed in 1930 and will be demolished as part of the proposed project. The subject property is flat and surrounded by low rise commercial buildings, including a CVS Pharmacy and a Vons Grocery Store. The project site is located within walking distance of the Glendale Transit Center/Metrolink Station. The recently approved Glendale Triangle Project is located across San Fernando Road. Glendale Memorial Hospital is located one block east of the Project site.

PROPOSED PROJECT

Kareco (the "Developer") is proposing to develop a 5-story mixed-use building consisting of 142 rental units above approximately 11,000 SF of commercial space and a 5,000 SF of commercial studio space on the ground floor (Project). The retail, office and studio tenant spaces will front San Fernando Road and Central Avenue. The Project is requesting a density bonus pursuant to SB1818. As such, 12 of the 142 units will be made available to very-low income households.

The proposed building is a "podium" style development similar to the Glendale Triangle Project located across the street on San Fernando Road and will be built from property line to property line. The Project includes several amenities such as a pool/spa, common lounge/community room, fitness center, outdoor living areas, a bike storage facility and a bike shop on the ground floor. The residential component will be a mix of 1 and 2-bedroom units that included 108 1-bedroom units ranging from 600 to 685 SF and 34 2-bedroom units ranging from 962 to 1,107 SF.

PARKING AND CIRCULATION

The Project is required to provide a total of 219 parking spaces for all proposed uses after implementation of SB1818 provisions. The Project will provide a total of 244 spaces; 25 spaces over the minimum requirement. The 43 commercial parking spaces will be provided in an on-grade parking lot on the ground floor while parking for the residential uses will be in the 2-level underground parking garage. No guest parking spaces are required per the provisions of SB 1818.

Access to the on-grade retail parking spaces will be provided from San Fernando Road. Access to the underground residential and retail parking will be provided in the public alley.

DISCRETIONARY ENTITLEMENTS

STAGE II DESIGN REVIEW

Design review for development within the San Fernando Road Corridor is performed by the City Council. The Project has been reviewed by City staff and evaluated based on the design standards,
Because the Developer is agreeing to rent and restrict occupancy of 11% (12 units) of the maximum residential density of 105 units (base unit count) to very-low income households, Government Code Section 65915 and Glendale Municipal Code Section 30.36.060 require the City to grant the Project a 35% density bonus, or 37 density bonus units. This mandatory density bonus allows the Project to have 142 units.

Because the Developer is providing 11% of the base unit count to very-low income households, the Project is entitled to two (2) concessions. As provided in California Code Section 65915(p), upon request of the Developer, the City cannot require a vehicle parking ratio greater than one (1) space per unit for studios and one-bedroom units, and two (2) spaces per unit for two bedroom units, inclusive of guest parking for a density bonus project. The Glendale Municipal Code normally requires two (2) spaces per unit for studios, one-bedroom, and two bedroom units. There is also a requirement of .25 spaces per unit for guest parking, when a development has four or more units.

The Developer will not utilize the two concessions the Project is entitled to pursuant to SB1818.

The Density Bonus Housing Plan (Plan) and Density Bonus Housing Agreement (Agreement) summarizes the Project’s affordable housing component and secure the affordable covenants on the subject units for thirty (30) years. The Housing Plan provides a brief background on number of dwelling units proposed, maximum number of units permitted per Zoning Code, mandatory density bonus, parking concession, and dispersal of affordable units. The Housing Agreement goes into further detail on term of affordability covenants, selection of tenants and qualifications, and maintenance of units. The Housing Plan and Density Bonus Housing Agreement will be prepared prior to issuance of a building permit.

**CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) REVIEW**

The Draft EIR was made available for public review for a 30-day period from September 12, 2013 through October 14, 2013. The Draft EIR has been prepared pursuant to the requirements of the State Guidelines for the implementation of the California Environmental Quality Act (CEQA). Potential impacts were either less than significant or mitigated to less than significant for aesthetics, cultural resources, hazards and hazardous materials, land use and planning, public services, population and housing, traffic and transportation, and utilities and service systems. Overall, project implementation was determined to result in significant and unavoidable environmental impacts related to short-term noise and vibration impacts during construction, recreation impacts due to project implementation, and cumulative solid waste impact.

Based on these potentially significant and unavoidable impacts, the following alternatives were evaluated to provide decision makers with a reasonable range of alternatives that either eliminate or reduce the impacts of the project.

- Alternative 1 – No Project/No Development Alternative
- Alternative 2 – Reuse/Reduced Density Alternative; and
- Alternative 3 – Industrial Only Alternative.

**FEASIBILITY REVIEW OF ALTERNATIVE 2**

The Proposed Project consists of 142 residential units, 16,200 SF of commercial/retail and 244 parking spaces. The Project includes 108 one-bedroom units and 34 two-bedroom units. A total of 43 retail parking spaces will be provided at grade level with the remaining parking
guidelines, policies, and intentions of the San Fernando Road Corridor. Staff has determined the Project is ready for Stage II Design consideration by the City Council (Exhibit 2) for its consistency with the requirements, goals and policies of the San Fernando Road Corridor as well as for its high-quality design.

The Project’s Stage I Design was approved by the City Council on May 14, 2013 without any major comments. Council questioned whether the arch element along Central Avenue would be consistent with the contemporary and clean design of the building. The Project architect has redesigned the Central Avenue façade and eliminated the arch design. This element has been relocated to the façade abutting the public alley (west elevation).

SUMMARY OF PRINCIPAL URBAN DESIGNER’S REVIEW

PROJECT CONTEXT:

The Project is located on a 1.05-acre property at the corner of San Fernando Road and Central Avenue, located across the street from the Triangle Project and its iconic “ship’s prow” feature.

The Project is within the Tropico Station district, an emerging mixed-use pedestrian- and transit-oriented district stretching along San Fernando Road between Los Feliz Road and Cerritos Park at Brand Boulevard. This district encompasses the Glendale Transit Center / Metrolink Station, Glendale Memorial Hospital, Cerritos Elementary School, and the main entrance to Forest Lawn Memorial Park. In addition to these dominant uses, the older industrial buildings and warehouses in this district support the Luna Playhouse and various furniture, tile and other similar showrooms / businesses, that with the art gallery and loft scene in adjacent Atwater Village creates in a nascent “arts and design” identity that anchors the south end of the San Fernando Road Creative Corridor. As such, the character of this district is more architecturally eclectic than other areas of Glendale, such as Downtown or the GC3 Campus.

SITE PLANNING, MASS AND SCALE, AND BUILDING DESIGN AND DETAILING:

The building is a conventional “podium” structure, with ground floor retail and a courtyard on the second floor. The courtyard faces southwest towards the alley, giving the building a U-shaped footprint, with full five-story facades fronting the two streets.

The building essentially occupies the entire site with nominal setbacks, with insets for arcades along portions of both San Fernando Road and Central Avenue. Additionally, at the intersection of these two streets, the building is “notched” to create a deep setback appropriate for outdoor dining.

The building is uniformly five stories (or approximately 75 feet) high and since the plan has almost no setbacks, the façades sit at the property line. The impact of the building’s mass, however, is mitigated by rhythmic pattern of the façade design. The façade is articulated by alternating solid masses of color and voids created by glass balconies. Visually evoking musical notation, the glass balconies create the staff, against which the solid masses are the “notes.” Like musical notes, the solids vary in height – sometimes reaching from the sidewalk to the top of the building, and sometimes floating at various heights above the storefronts and topping off at various parapet heights.

The primary design feature of the street façades and therefore the building is the repetitive pattern of column-like rectangular forms, each in one of three material finishes and colors. While
the materials vary between vertical-arranged metal siding or fiber cement panels, the colors alternate between purple/plum, grey/taupe, or turquoise. Yellow window frames, which echo the yellow façade of the Triangle development across the street, occasionally project beyond the facade. These repetitive columns of color are anchored by horizontal grid lines of glass balconies and spandrel glass.

In addition to the Stage II Design Review, the proposal includes the following requests:

**SIGN PROGRAM**

Sign programs (Chapter 30.33.220) are required for lots or sites where new nonresidential buildings or additions of nonresidential floor area are approved for construction and where there are at least two (2) separate nonresidential occupancies on the lot or site. The Sign Program for the Project proposes a variety of sign types including projecting signs, marquee signs, a ground sign, and window signs for future retail/commercial tenants located on the ground floor.

All retail/commercial tenants will be primarily identified by marquee and project signs. The marquee sign will be constructed out of metal and mounted to the canopies. These signs will be non-illuminated. The projecting signs will be mounted perpendicular to the building façade under the canopy. Projecting signs will also be non-illuminated. Window signs are also permitted. These signs will either be professionally hand painted or computer cut adhesive vinyl applied directly to the glass surface. A ground sign will list all retail/commercial tenants.

The various sign types that are proposed under the Sign Program for each retail/commercial tenant are attractive and will not create visual clutter. The proposed design of each sign type is harmonious with the design of the building. Staff is recommending approval of the Sign Program.

**CONDITIONAL USE PERMIT (CUP)**

A conditional use permit is required to develop multiple residential dwelling units in the Industrial/Commercial-Residential Mixed Use (IMU-R) Zone (Chapter 30.14, Table 30-14-A). The Project is a 5-story mixed-use building. The ground floor will accommodate retail/commercial tenant spaces, while floors two-five contain 142 residential dwelling units. This IMU-R permits a variety of land uses including institutional, industrial/manufacturing/processing, multi-family residential (with a CUP), retail/commercial, service-related, and office uses. These uses are consistent with the underlying zoning designation and the General Plan. As such, the proposed uses will not be detrimental to the public health, safety, or general welfare. The Project will not conflict with adjacent uses or impede with the normal development of surrounding property as each project is reviewed on a case-by-case basis and on its own merit. Additionally, the Project will be served by existing public and private utilities and will meet all zoning requirements such as, parking and landscaping.

The Project and its proposed uses meet the development standards of the IMU-R zone and various element of the General Plan. Staff recommends approval of the conditional use permit to allow multi-family residential dwelling units in the IMU-R zoning district.

**SB 1818 - DENSITY BONUS**

State law allows a developer to build at a higher density than the zoning permits in exchange for the developer's agreement of including some affordable residences in the project. Specifically, density bonuses are intended to provide incentives for the construction of housing for low income or senior households and may be granted when the project exceeds the density limit of the subject site's underlying zoning designation.
provided in two subterranean levels. The Developer has also requested a density bonus which allows for 12 affordable units to be set aside for very-low income households.

Alternative 2 contemplates retaining the older building located at 3901 San Fernando Road/1601 S. Central Avenue. The Developer would demolish the commercial/industrial building at 3915 San Fernando Road to develop a project with 88 residential units, 6,400 SF of commercial/retail space and 186 parking spaces. This alternative proposes 56 one-bedroom units and 32 two-bedroom units. As with the Proposed Project, some retail parking will be provided on the ground floor with the remaining residential and commercial parking provided in two subterranean levels. Given that the Developer has requested a density bonus, four (4) units will be set aside for very-low income households.

Keyser Marston and Associates (KMA) evaluated the feasibility of the new development portion of Alternative 2 and compared that to the feasibility of the Proposed Project (Exhibit 4). KMA has performed a pro forma analysis of the Proposed Project and Alternative 2. KMA has concluded that the Proposed Project is more feasible than Alternative 2 based on the following:

- Construction of the subterranean parking for Alternative 2 will be more complicated due to shoring and support requirements to protect the building that remains.
- The building and unit layout for Alternative 2 is less efficient than the Proposed Project, meaning that there is a higher percentage of circulation and other non-rentable space in Alternative 2.
- The commercial building has below-market rents from the existing retail, studio and office space, which would continue under Alternative 2.
- Retaining the commercial building will require substantial rehabilitation at a considerable cost, including new roof, handicap restrooms, elevator, fire sprinkler system, fire alarm system, and air conditioning units; extensive tenant improvements; extensive sound proofing of the existing studio; and rehabilitation of all windows to prevent leakage and energy loss.
- The loss of income from Alternative's Two's reduced size would far outweigh the additional cost of constructing 54 more units for the Proposed Project.

PUBLIC NOTICE

The Code requires publication of public notices when the Council considers approval of entitlements such as design review, standards variances, and conditional use permit. Staff has published all required notices in the Glendale News Press and has mailed copies of the notices to all property owners and occupants within the 500' of the project. A public notice has also been posted on-site.

FISCAL IMPACT

There is no fiscal impact associated with the consideration of the Stage II Design submission and other actions. However, if implemented, the Project would have a fiscal impact consistent with other high density residential projects including new property taxes, Parks and Library Development Impact Fees, building permit/plan check fees, and in increased sales tax by expanding the San Fernando Road
The Developer estimates a Project value of $24.8M. The City receives 13.57% of the property tax. Based on the estimated value, the Project would generate an estimated $33,700 annually in property tax to the General Fund. Additionally, the Project will also pay an in-lieu Art Fee of approximately $248,000, Parks and Library Development Impact Fees of $1,037,000, school fees in the amount of $384,000, and approximately $486,000 in building permit/plan check fees.

A summary of the anticipated Project generated revenue is estimated below:

<table>
<thead>
<tr>
<th>Description</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Property Tax (annual)</td>
<td>$33,700</td>
</tr>
<tr>
<td>In Lieu Art Fee</td>
<td>$248,000</td>
</tr>
<tr>
<td>Parks and Library Impact Fee</td>
<td>$1,037,000</td>
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<tr>
<td>School Fee</td>
<td>$384,000</td>
</tr>
<tr>
<td>Permit/Plan Check Fees</td>
<td>$486,000</td>
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</tbody>
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**ALTERNATIVES**

In regards to the **Stage II Design Submission**, the City Council has the following three alternatives to consider:

- **Alternative 1**: Approve Stage II Design Submission, with or without comments.
- **Alternative 2**: Approve the Stage II Design Submission, subject to design recommendations made by the City Council.
- **Alternative 3**: Deny approval of the Stage II Design Submission and direct a redesign of the Project.

In regards to the **Sign Program**, the City Council has the following three alternatives to consider:

- **Alternative 1**: Approve the Sign Program with or without comments.
- **Alternative 2**: Approve the Sign Program with conditions made by the City Council.
- **Alternative 3**: Deny approval of the Sign Program and require the Developer to redesign.

In regards to the **Conditional Use Permit**, the City Council has the following three alternatives to consider:

- **Alternative 1**: Approve the Conditional Use Permit based on the proposed findings and conditions of approval submitted by staff.
- **Alternative 2**: Approve the Conditional Use Permit subject to the findings and conditions made by the City Council.
- **Alternative 3**: Deny the Conditional Use Permit.

**CAMPAIGN FINANCE DISCLOSURE**

In accordance with Council direction pursuant to the recently adopted City Campaign Finance Ordinance, the names and business addresses of the members of the board of directors, the chairperson, CEO, COO, CFO, subcontractors and any person or entity with 10% interest or more in the company proposed for contract in this Agenda Item Report is attached as Exhibit 7.
EXHIBITS

Exhibit 1: Final Environmental Impact Report (FEIR) (Available for viewing in the office of the City Clerk and the City Website).
Exhibit 2: Stage II Design Submission
Exhibit 3: Principal Urban Designer’s Review
Exhibit 4: Feasibility Review of Alternative 2 by KMA
Exhibit 5: CUP Findings
Exhibit 6: Conditions of Approval Stage II Design Review, Sign Program, and Conditional Use Permit
Exhibit 7: Campaign Finance Disclosure
RESOLUTION NO. _______________

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF GLENDALE
CERTIFYING THAT THE CITY COUNCIL HAS REVIEWED AND
CONSIDERED THE INFORMATION IN THE FINAL ENVIRONMENTAL
IMPACT REPORT FOR THE GLENDALE LINK PROJECT, MAKING CERTAIN
FINDINGS AND DETERMINATIONS REGARDING THE ENVIRONMENTAL
EFFECTS OF THE PROJECT, AND ADOPTING A STATEMENT OF
OVERRIDING CONSIDERATIONS.

WHEREAS, the City of Glendale (the "City") is engaged in implementing plans and
policies of the Glendale General Plan; and

WHEREAS, the Link Project, to be located at 3901-3915 San Fernando Road, consists
of approximately 1.05 acres of land on four adjoining lots located at the northwest corner of
Central Avenue and San Fernando Road (the "Site"); and

WHEREAS, Kareco (the "Developer") proposes to develop a 5-story, mixed-use building
consisting of 142 residential rental units above approximately 11,600 square feet of commercial
space and 5,000 square feet of commercial studio space located on the ground floor; twelve of
the 142 units will be made available to very-low income households (the "Project"); and,

WHEREAS, a Draft Environmental Impact Report ("Draft EIR") for the Project was
prepared and made available for a 30-day public review from September 12, 2013 through
October 14, 2013 pursuant to the California Environmental Quality Act ("CEQA"), Public
Resources Code §§21000 et seq., and State and City Guidelines adopted pursuant thereto; and

WHEREAS, the Final Environmental Impact Report ("Final EIR") for the Project was
prepared pursuant to CEQA and the State CEQA Guidelines, and incorporated the Draft EIR
and written responses to the verbal and written comments made at the public hearing and
during the CEQA review period; and

WHEREAS, the City, as Lead Agency under CEQA, has reviewed and considered all the
information contained in the Final EIR for the Project.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Glendale that the
Final EIR for the Project is hereby certified as complete based on the following findings:

1. Each and all of the Findings and Determinations contained in this document are based
upon competent and substantial evidence, both oral and written, contained in the entire
record relating to the Project and the Final EIR. The Findings and Determinations
constitute the independent Findings and Determinations of the City in all respects and
are fully and completely supported by substantial evidence. All of the language included
in this document constitutes findings by the City, whether or not any particular sentence or clause includes a statement to that effect.

2. All summaries of information and the Findings to follow are based on the Final EIR, the Project (and every component thereof), and/or other evidence in the record. The absence of any particular fact from any such summary is not an indication that a particular finding is not based in part on that fact. The summaries of information below are only summaries. Cross-references to the Final EIR and other evidence in the record have been made where helpful, and reference should be made directly to the Final EIR and other evidence in the record for more precise information regarding the facts on which any summary is based. In addition, unless noted or stated otherwise, the rationale for the Findings is set forth in the Final EIR (including responses to comments) or elsewhere in the administrative record.

3. The following Findings are hereby adopted by the City as required by the Public Resources Code §§21081, 21081.5 and 21081.6 and CEQA Guidelines §§15091 through 15093, in conjunction with the approval of the Project. The Final EIR identified significant impacts associated with the Project. Approval of a project with significant impacts requires that findings be made by the Lead Agency. Significant impacts of the Project would either: (1) be mitigated to a less than significant level pursuant to the mitigation measures identified in the Final EIR; or (2) mitigation measures notwithstanding, have a residual significant impact that requires a Statement of Overriding Considerations. Specifically, the CEQA Guidelines section 15091 requires the City to make one or more of the following written findings:

(a) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.

(b) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

(c) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.
These findings accomplish the following: (a) they address the significant environmental effects identified in the Final EIR for the Project; (b) they incorporate all mitigation measures associated with the significant impacts identified in the Final EIR; (c) they indicate whether a significant effect is avoided or reduced by the adopted mitigation measures to a less-than-significant level or remains significant and unavoidable, either because there are no feasible mitigation measures or because, even with implementation of mitigation measures, a significant impact will occur, or because such changes and alterations are within the responsibility and jurisdiction of another public agency; and (d) they address the feasibility of all project alternatives and mitigation measures identified in the Final EIR. For any effects which will remain significant and unavoidable, a "Statement of Overriding Considerations" is adopted.

The City hereby adopts and incorporates, as conditions of approval, the mitigation measures set forth in the Findings below to reduce or avoid the potentially significant and significant impacts of the Project, as well as certain less-than-significant impacts. In adopting these mitigation measures, the City intends to adopt each of the mitigation measures recommended in the Final EIR, except to the extent such mitigation measures are specifically rejected or specifically modified by these Findings. With respect to any mitigation measures that were proposed in comments on the Draft EIR, the responses to comments in the Final EIR explain why the proposed mitigation measures are not recommended by the Final EIR for adoption. The City hereby adopts and incorporates by reference the reasons stated in the responses to comments contained in the Final EIR as its grounds for rejecting adoption of these proposed mitigation measures.

4. The City hereby incorporates by reference Attachment "A" entitled "Statement of Overriding Considerations" and Attachment "B" entitled Mitigation Monitoring and Reporting Program", in support of this Resolution.

5. The City has received, reviewed, and considered the foregoing information as well as any and all other information in the record, and hereby makes the following Findings and Determinations based on substantial evidence pursuant to and in accordance with Section 21081.5 of the Public Resources Code.

6. Pursuant to Section 21082.1(c) of the Public Resources Code, the City finds that the Final EIR reflects the independent judgment of the City as Lead Agency for the Project.

7. IMPACTS DETERMINED TO BE LESS THAN SIGNIFICANT. As specifically described in the Initial Study included as Appendix 1.0 of the Draft EIR, certain potential impacts related to Aesthetics, Agricultural Resources, Biological Resources, Geology and Soils, Hazards...
and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Utilities, Public Services, Transportation/Traffic, and Utilities and Service Systems, were determined to be less than significant by the City. The City hereby adopts and incorporates by reference the reasons stated in the Draft EIR as its grounds for determining that each of these potential environmental impacts are less than significant and that further analysis of these impacts in the Final EIR was not required.

8. In accordance with Public Resources Code section 21081, the Final EIR for the Link ("Project") examined the potential for significant effects on the environment following project approval and implementation. The following environmental impact categories were examined in order to assess the likelihood of significant or unavoidable impacts: (1) Aesthetics, (2) Air Quality, (3) Cultural Resources (4) Geology and Soils (5) Greenhouse Gas Emissions (6) Land Use and Planning, (7) Noise, (8) Public Services, (9) Recreation, (10) Transportation/Traffic, (11) Utilities and Service Systems. In addition, significant irreversible environmental changes and growth inducing impacts were examined. The impacts, mitigation measures, and findings that are applicable to the Project are set forth below.

9. **LESS THAN SIGNIFICANT IMPACTS IDENTIFIED AND ANALYZED IN THE EIR.**

The Final EIR identified the following less than significant impacts associated with the Project. The City finds and determines that the following environmental impacts are not significant and that no mitigation measures are needed.

A. **Aesthetics**

*Impact: Have a substantial adverse effect on a scenic vista.*

*Findings: The City finds that the Project will not have a substantial adverse effect on a scenic vista. Therefore, the impact to scenic vistas is less than significant and mitigation is not required.*

The Project site is located within a highly urbanized area. Existing scenic vistas from the portion of Glendale where the project site is located are limited to the long-range views of the Verdugo Mountains to the north, Santa Monica Mountains to the west and San Rafael Hills to the east. The high-rise hospital buildings east of the Site currently restrict views east across the property. Similarly, the Glendale Triangle, located immediately east of the Site across San Fernando Road, which consists of five stories of residential uses, would further restrict any existing views of the Verdugo Mountains and the San Rafael Hills. Due to the highly developed nature of the
area, long distance views of these mountains are mostly limited to the views along major streets as existing buildings block or obstruct the views from other locations on and around the Site. Views of the Verdugo Mountains north of the Site are currently available; however, these views are largely obstructed by existing development and large street trees. As a result of the existing pattern and scale of development on and around the Site, no scenic vistas are available.

*Impact:* Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

*Finding:* The City finds that the Project will not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. Therefore, no mitigation is required.

The Project site is currently developed and does not contain any natural scenic resources, such as native trees or rock outcroppings. In addition, the Site is not located within the view corridor of any state scenic highway, as there are no state-designated scenic highways within the City. Therefore, the proposed Project would not significantly damage scenic resources within a state scenic highway, and no impact will result.

*Impact:* Substantially degrade the existing visual character or quality of the site and its surroundings.

*Finding:* The City finds that the Project will improve the visual character of the site, in light of the Project's aesthetic character, architectural design, use of design elements, and comprehensive landscape plan. Accordingly, development of the Project will not substantially degrade the existing visual character or quality of the Project site or its surroundings, and the impact is less than significant. Therefore, mitigation is not required.

Although the proposed Project would represent a change in the visual character of the Site, the overall quality of the design, including a corner plaza at the intersection of San Fernando Road and Central Avenue, and a glass storefront along both Central Avenue and San Fernando Road, would ensure the change in visual character of the Site would not degrade the existing visual character or quality of the Site and its surroundings. The proposed building would be visually compatible in terms of height and massing with the surrounding commercial, residential and hospital structures and would reinforce the pattern of existing buildings in the area.

The Project as designed includes architectural features which would enhance the visual character of the Site, including a corner plaza with outdoor seating areas along San Fernando Road and Central Avenue, and articulation of the prominent San Fernando and Central Avenue...
facades. The Project would include landscaping at the street level that would consist of street trees, ground cover, and shrubs to enhance the pedestrian environment. Parking provided on the ground level would be surrounded by the proposed structure with the remaining parking located below grade, and screened from public view. All supporting infrastructure, such as telecommunications equipment and utility lines, would be placed underground or screened from public view. Finally, signage associated with the retail-commercial component of the Project would meet the standards and programs contained in the Municipal Code.

Impact: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Finding: The City finds that since the Project will not use any highly reflective building materials or permanent sources of lighting that would affect light sensitive uses, the impact is less than significant. Therefore, no mitigation is required.

The proposed structure would consist of light- and medium-colored exterior wall materials balanced with low reflective glass materials. The building façade would be finished with a combination of metal siding, fiber cement board and spandrel glass infill. No one material would dominate the façade; rather the building would include "columns" of the varying materials. Highly polished materials or highly reflective glass that could reflect light and create glare are not proposed. No substantial glare impacts from building materials would result from the proposed Project.

Development of the proposed Project would establish new permanent sources of lighting that would increase the current low-intensity level of light on the site. No uses surrounding the site would be sensitive to light levels. The lighting proposed would be limited to the amount required to safely light entryways, driveways, storefront lighting, the sidewalks along San Fernando Road and Central Avenue, and public space areas within the project. In addition, landscape lighting would be utilized to accentuate landscape features. All outdoor lighting would be directed onto driveways, walkways, and public areas and away from adjacent properties and public rights-of-way to avoid any light or glare impacts from lighting fixtures included in the Project.

Direct and indirect lighting would be used for signage to be placed on-site and/or on building façades. Signage lighting would be focused onto sign surfaces and would generally be of low to medium brightness. All proposed signage and associated lighting would be subject to signage regulations and programs included in the Glendale Municipal Code.
Impact: Shade currently unshaded uses located off the site that are sensitive to shadow, such as residences, school playgrounds, parks, etc., for more than two continuous hours between 9:00 AM and 3:00 PM during the winter, or 9:00 AM and 5:00 PM during the summer.

Finding: The City finds that the Project would not shade currently unshaded uses located off the site that are sensitive to shadow, such as residences, school playgrounds, parks, etc., for more than two continuous hours between 9:00 AM and 3:00 PM during the winter, or 9:00 AM and 5:00 PM during the summer. Therefore, no mitigation is required.

The closest shadow-sensitive uses located within the vicinity of the Site will be the residential uses proposed on San Fernando Road northeast of the Site. The potential shade and shadow impacts of the proposed Project were analyzed by preparing a computer model of the proposed building and simulating the shadows that would be created by the structure. Shadows cast by the proposed Project would extend north northeast across the project site, partially shading the proposed Glendale Triangle (Camden) project parcel located across San Fernando Road. Although shadows would be cast on a residential (sensitive) use the length of time that shadows would be cast would not exceed 2 consecutive hours.

B. Air Quality

Impact: Conflict with or obstruct the implementation of the applicable air quality plan.

Finding: The City finds that the Project does not conflict with or obstruct the implementation of the 2007 AQMP; therefore, the impact is less than significant and mitigation is not required.

The 2007 Air Quality Management Plan ("AQMP") was prepared to accommodate growth, to reduce the levels of pollutants within the areas under the jurisdiction of the South Coast Air Quality Management District ("SCAQMD"), to return clean air to the region, and to minimize the impact on the economy. Projects that are considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Therefore, projects, uses, and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds.

Consistency with the assumptions in the AQMP is established by demonstrating that the Project is consistent with the land use plan that was used to generate the growth forecast. The 2007
AQMP based its assumptions on growth forecasts contained in the SCAG 2004 Regional Transportation Plan (2004 RTP). The 2004 RTP is based on growth assumptions through 2030 developed by each of the cities and counties in the SCAG region and was updated in 2012. According to the SCAG 2004 RTP growth projection data, Los Angeles County is projected to have an employment population of 4,558,000 in 2020. Existing employment data from the California Employment Development Department indicates that Glendale has an employment population of approximately 96,000 and Los Angeles County has an employment population of approximately 4,439,300 as of April 2013. The Project would not increase the employment population over those that have been projected for the City in 2020 and would not exceed the growth assumptions in the AQMP.

**Impact:** Generate total criteria pollutant emissions during construction or operation (direct and indirect) in excess of the thresholds given in Table 4.2-4, South Coast Air Quality Management District Regional Emission Thresholds

**Finding:** The City finds that the Project would not generate total criteria pollutant emissions during construction or operation (direct and indirect) in excess of the thresholds given in Table 4.2-4, South Coast Air Quality Management District Regional Emission Thresholds

**Construction Emissions:**

Construction emissions are generated from projects as a result of operation of mobile equipment and motor vehicles, disturbance of soil, and application of architectural coatings and asphalt paving. As indicated in Table 4.2-4 of the Final EIR, the SCAQMD has established construction thresholds of significance for VOC, NOX, CO, SOX, PM10, and PM2.5. The Site is approximately 1.05 acres, and contains approximately 39,300 square feet of existing commercial and industrial uses and associated parking. The Project would be constructed in three phases beginning March 2014 and lasting approximately 24 months. The three phases consist of demolition, grading and excavation, and building construction. The demolition debris was estimated to amount to 3,544 cubic yards of material, which will be hauled from the site. Grading and excavation would result in the removal of approximately 32,786 cubic yards of material over three months. Construction of the residences, parking garage, commercial space, and recreational facilities would occur over 20 months. Architectural coating activities were included as a separate phase due to CalEEMod constraints, but would take place during the last few months of building construction.

Construction emissions include all emissions associated with the construction equipment, grading and demolition activities, worker trips, and on-road diesel trucks. The emissions are
considered to be conservative; that is, the emissions likely over predict the actual emissions that would occur during project construction. Emissions would not exceed the SCAQMD's significance thresholds during any phase of construction.

**Operational Emissions:**

Based on the operational emissions associated with complete buildout and operation of the project, the Project would not exceed the SCAQMD's significance thresholds during operation. Additionally, there are existing uses with associated emissions of air pollutants currently occupying the site. Under CEQA, the net contribution is considered, meaning that existing emissions should be subtracted from new emissions, as has been done for the greenhouse gas analysis. This has not been done for the air quality analysis due to the low emissions associated with the proposed Project. As a result, it should be noted that the results provided here are therefore highly conservative. Operational emissions are considered less than significant.

**Impact:** Result in a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

**Finding:** The City finds that the Project would not result in a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment under an applicable federal or state ambient air quality standard, therefore no mitigation is required.

According to the SCAQMD CEQA Handbook, projects that do not exceed the project-specific SCAQMD thresholds of significance should be considered less than significant on a cumulative basis unless there is other pertinent information to the contrary.

Operational and construction emissions are below the thresholds of significance. Therefore, the proposed Project's contribution of these emissions to the air quality within the Air Basin would not be cumulatively considerable.

**Impact:** Expose sensitive receptors to substantial pollutant concentrations

**Finding:** The City finds that the Project would not expose sensitive receptors to substantial pollutant concentrations therefore no mitigation is required.

The SCAQMD recommends that the potential localized impacts be evaluated on the ambient air concentrations due to on-site construction emissions of NOX, CO, PM10, and PM2.5. On-site
construction and operational emissions of NOX, CO, PM10, and PM2.5 would not exceed the SCAQMD LST thresholds for nearby sensitive receptors.

The Project was evaluated to determine if it would cause a CO hotspot utilizing a simplified CALINE4 screening model developed by the Bay Area Air Quality Management District (BAAQMD). The results of these CO concentration calculations are presented in Table 4.2-10, Carbon Monoxide Concentrations – With Cumulative and Project Traffic, to present the worst-case scenario the determination of significance is based on representative receptors located 0 feet from the intersection. Receptors 25 feet from an intersection would experience lower concentrations and therefore were not calculated. No significant CO hotspot impacts would occur to sensitive receptors in the vicinity of these intersections.

The proposed Project would result in some minor emissions of TACs, primarily from diesel-fueled trucks. The SCAQMD recommends a detailed health risk assessment be performed for Diesel Particulate Matter (DPM) for facilities that are substantial sources of DPM. Such sources are considered to be land uses such as truck stops and warehouses. As the total number of additional truck trips is very few in comparison to a facility such as a warehouse, for which CARB assumes a minimum of 100 truck trips per day, the proposed Project would not be considered a substantial source of DPM. There are no other substantial sources of other TACs associated with the proposed Project.

*Impact: Expose sensitive receptors to objectionable odors.*

*Finding: The City finds that the Project will not result in objectionable odors affecting a substantial number of people; therefore, the impact is less than significant and therefore mitigation is not required.*

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 Project would not include the development and operation of any of these land uses.

Potential sources of odors may include food preparation, which could generate odors associated with the preparation and disposal of food products or chemical off gassing. However, the food will generally be prepared on the Site, within the proposed buildings. All food will be disposed of in accordance with local regulations as they relate to ventilation and refuse disposal. Any Project generated refuse would be stored in covered containers and removed at
regular intervals in compliance with the County's solid waste regulations. Therefore, it is unlikely for substantial nuisance odors to be perceived off the Project Site.

C. Cultural Resources

Impact: Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5

Finding: The City finds that the Project will not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 therefore mitigation is not required.

Based on research and analysis, the building at 3901 San Fernando Road does not appear to meet the criteria for inclusion on the National Register or the California Register based on its architectural design or craftsmanship. The architecture style is a typical Spanish Colonial Revival style with Moorish influence (pointed arch windows along Central); it is not of Moorish Revival style. It is not an example of a master craftsman or designer. The building has only a fair level of architectural integrity due to numerous alterations. While the building is associated with realtor L. H. Wilson, who was involved in development and real estate activities focused on San Fernando Road in the 1920s and 1930s, this association with a person does not meet the threshold for significance to the National Register or the California Register.

With regard to the City's criteria for determining significance, no historic events occurred in this building. Although the site contained a commercial building from the early development of Glendale when this area was known as Tropico, that association predates the current structure.

The building is not associated with anyone who has significantly contributed to history. L. H. Wilson, the original owner and developer of the building, was a realtor with a prosperous real estate business who developed several buildings between 1922 and 1942. There is no evidence, however, that Wilson's business activities were a significant achievement in comparison with the accomplishment of other realtors and developers of the period. Therefore, the building does not appear to meet this criterion.

The building is not the work of a significant architect, master craftsman, or designer. The building does not possess high artistic values; it has only a fair level of architectural integrity due to numerous alterations. This building has undergone a number of "major alterations" including: removal of a prominent central tower, removal of a tower at the north end of the structure, removal of clay from the roof, the brickwork has since been exposed, and the clay tile roofing has been removed, the addition of a commercial billboard to the second floor roof; a parapet
along the south façade of the one-story wing; a parapet atop the shed-roofed transitional bay between the one- and two-story volumes; the replacement of some second-story windows on the west (rear) façade; the replacement of the ground floor storefronts with aluminum storefront, and removal of all first floor display windows and entry doors. As a result of these major alterations, the building does not embody exemplary characteristics of an architectural style.

The building at 3901 San Fernando Road is not a contributing building to a historic district as there is not a concentration of extant early 20th Century buildings on this section of San Fernando Road. Most of the parcels around the subject property have been redeveloped over the 20th century with buildings from the second half of the 20th century.

Given the above, the building does not appear eligible for inclusion on the City of Glendale Register of Historic Resources.

D. Geology and Soils

Impact: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking.

Finding: The City finds that the Project will be designed in compliance with all applicable building codes to ensure safety in the event of an earthquake, which building features are intended to minimize the risk of loss, injury, or death involving strong seismic ground shaking, therefore mitigation is not required.

The Project site could be subject to strong ground shaking in the event of an earthquake originating along one of the faults listed as active or potentially active in the Southern California area. This hazard exists throughout Southern California and could pose a risk to public safety and property by exposing people, property, or infrastructure to potentially adverse effects including strong seismic ground shaking. Design of the proposed structures would be required to comply with all applicable building codes to ensure safety in the event of an earthquake.

Impact: Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic related ground failure, including liquefaction.

Finding: The City finds that there is a low exposure risk to people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic related ground failure, including liquefaction therefore no mitigation is required.
Liquefaction is a phenomenon associated with shallow groundwater combined with the presence of loose, fine sands, and/or silts within a depth of 50 feet below grade or less. Liquefaction occurs when saturated, loose, fine sands and/or silts are subjected to strong ground shaking resulting from an earthquake event. Liquefaction has the potential to result in the soil temporarily losing part of all of its shear strength. Part of this strength may return sometime after shaking ceases. Liquefaction potential decreases with an increase in grain size, and clay and gravel content. Increasing duration of the ground shaking during a seismic event can also increase the potential for liquefaction.

Groundwater was encountered in one of the test borings as a depth of 50.5 feet. Historical high groundwater at the site is reported to be approximately 45 feet below grade. Further, the Site is not located within a State of California designated liquefaction hazard zone. Due to the relative densities of the soil materials encountered within the test borings, the depth of historical groundwater, the potential for liquefaction is considered low.

**Impact:** Be located on expansive soil, as defined in Table 18-1-B of the California Building Code (2001), creating substantial risks to life and property.

**Finding:** The City finds that based on the results of field investigation, the site is underlain by relatively granular soils that are anticipated to have very low to negligible expansion potential, therefore the Project will not create a substantial risks to life and property and no mitigation is required.

Soils that have to potential for volume change (shrinkage and swelling) caused by moisture variations or drying and wetting cycles are classified as expansive soils. Soil moisture variations are typically a result of rainfall, irrigation, poor drainage, roof drains, discharging surficially, and exposure to heat and drought conditions. This shrinkage and swelling action can potentially result in distress to pavements, floor slab-on-grade, and foundations and grade beams. Based on the results of the field investigation, the Site is underlain by relatively granular soils that are anticipated to have very low to negligible expansion potential.

**E. Greenhouse Gas Emissions**

**Impact:** Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

**Finding:** The City finds that the Project will not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment therefore no mitigation is required.
The construction activities required to facilitate buildout of the proposed Project would include the use of heavy-duty construction equipment. The vast majority of construction equipment (e.g., backhoes, cranes, rubber-tired loaders, scrapers, and haul trucks) rely on fossil fuels, primarily diesel, as an energy source. The proposed Project would result in short-term emissions of GHGs during construction; that is, the emissions would occur only during active construction and would cease after the proposed Project was built. The other primary GHGs (hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride) are typically associated with specific industrial sources and would not be emitted by the proposed Project. The emissions of CO2 were estimated using the CalEEMod model.

Direct emissions of CO2 emitted from operation of the proposed Project include area source emissions (from natural gas consumption) and mobile source emissions. The proposed Project would also result in indirect GHG emissions due to the electricity demand. The total GHG emissions (minus existing GHG emissions) would be 1,627 metric tons of CO2e per year which would be below the threshold of 3,000 metric tons of CO2e per year. The estimated net emissions from the proposed Project would not exceed the applicable threshold.

**Impact:** Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

**Finding:** The Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases therefore no mitigation is required.

The purpose of the proposed Project is to replace an existing land use. The Project would produce GHG emissions below the draft SCAQMD significance threshold for land use projects, which was designed to enable the region to meet the requirements of AB 32. The Project incorporates design standards and measures that are both feasible and consistent with many of the recommended measures for new projects from other guidance documents including California Air Resources Board, AB 32 Climate Change Scoping Plan, California Air Pollution Control Officer's Association, CEQA and Climate Change, California Climate Action Team, 2006 Climate Action Team Report to the Governor and Legislature and 2007 Updated Macroeconomic Analysis of Climate Change Strategies, Office of Planning and Research, Technical Advisory, CEQA and Climate Change, Attorney General's Office, Addressing Climate Change at the Project Level.
F. Land Use and Planning

Impact: Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Finding: The City finds that the Project will not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect therefore no mitigation is required.

The site could accommodate a maximum residential density of 105 units under the existing zoning. The proposed Project would apply for a residential density bonus as provided for in the City’s Municipal Code. The construction of 142 units would exceed the permitted residential density by approximately 35 percent, and the applicant would be required to provide affordable residential units in order to qualify for this density bonus. Depending on the income affordability category, the Project would be required to provide a minimum of 11 percent of 105 units (12 units) as affordable to very low income households up to a maximum of 42 units affordable to moderate income households.

Projects in the City of Glendale which include a density bonus are allowed a parking concession and are not required to provide guest parking. Based on the City’s parking standards, the proposed Project (Option 1, which went before the City Council as Stage 1) would be required to provide a total of 333 off-street parking spaces without a parking concession, and 226 parking spaces with a parking concession. As the proposed Project would provide 244 parking spaces, the proposed Project would comply with all applicable requirements related to parking. The proposed Project would be consistent with the City of Glendale’s image and community identity by adding a mixed-use project into downtown Glendale. The proposed Project would add to the diversity of existing residential housing types in the City by providing studios and lofts units for rent in a mixed-use project located in an area with multiple transit options. The proposed Project could improve economic vitality in downtown Glendale by adding restaurant and restaurant/entertainment uses to the area and by providing patrons for neighboring retail-commercial uses.

The primary objective of the Redevelopment Plan is to eliminate conditions of blight by revitalizing and upgrading properties within the Project Area. The proposed Project would
implement the goals of the City’s Redevelopment Plan by developing and improving the Project site, which is currently a vacant commercial building, with a new mixed-use project providing new entertainment uses in close proximity to public transportation. Therefore, the Project would comply with the primary objective of the Redevelopment Plan. Additionally, the Redevelopment Plan is required by law to be compliant with applicable provisions of the General Plan and Municipal Code.

Development of the identified related projects would result in changes to existing land uses in the City through the conversion of vacant land and low-density uses to higher density uses. All identified City-wide related projects would be reviewed for consistency with adopted land use plans and policies by the City of Glendale. For this reason, related projects are anticipated to be consistent with applicable General Plan and Zoning Ordinances, or be subject to an allowable exception, and further, would be subject to CEQA, mitigation requirements, and design review. Therefore, cumulative impacts to land use as a result of development conflicting with applicable land use plans and policies would be less than significant.

G. Noise

Impact: Would result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; and

Would result in a substantial permanent increase in ambient noise levels in the project site vicinity above levels existing without the proposed Project.

Finding: The City finds that the Project will not result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; or result in a substantial permanent increase in ambient noise levels in the project site vicinity above levels existing without the proposed Project, therefore no mitigation is required.

Vehicle Noise – Vehicular noise can potentially affect the Site, as well as land uses located along the studied roadway system, including nearby noise sensitive receptors. As shown in Table 4.7-5 of the Final EIR, existing plus proposed Project modeled noise levels on the Site along San Fernando Road between Los Feliz Boulevard and Central Avenue would be approximately 61.4 dB(A) CNEL, and along Central Avenue south of San Fernando Road would be about 53.4 dB(A) CNEL. In both cases, noise levels would be below the City of Glendale Municipal Code exterior noise threshold of 65 dB(A) for residential uses. Vehicular noise can
potentially affect the project site, as well as land uses located along the studied roadway system, including nearby noise sensitive receptors. Existing plus proposed Project modeled noise levels on the Site along Broadway, between Maryland Avenue and Louise Street would be approximately 63.4 dB(A) CNE and along Maryland Avenue, between Broadway and Harvard Street would be about 54.5 dB(A) CNE. In both cases, noise levels would be below the City of Glendale Municipal Code exterior noise threshold of 65 dB(A) for residential uses. Therefore, impacts with regard to exterior noise levels would be less than significant. In addition, interior noise levels in the building along these roadways would be below the interior threshold of 55 dB(A) during the daytime and 45 dB(A) during the nighttime based on a typical reduction of 25 dB(A) of exterior to interior noise levels due to construction techniques. This is not to imply that greater reductions are not possible. In fact, noise levels reduction of 25, 30, and 35 dB(A) from buildings are common. As a result, impacts with regard to interior noise levels would be less than significant.

H. Public Services

Impact: Would the project result in substantial adverse impacts associated with the provision of new or physically altered governmental facilities, the 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 police protection.

Finding: The City finds that the Project will not result in substantial adverse impacts associated with the provision of new or physically altered governmental facilities, the 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 fire protection, therefore no mitigation is required.

Project implementation would result in the addition of approximately 398 new residents to the City of Glendale, as discussed in the Initial Study. Impacts associated with these additional residents include an increase in the number of fire department responses, routine fire prevention life/safety inspections, public education activities, participation in community events, and ongoing relations with the homeowners’ association. In addition, the new residents generated by the proposed Project would reduce the present firefighter to population service ratio of 1.15 per 1,000 residents by less than 1 percent. The increase in residents within the City would not substantially impact the current fire services and would not result in the need for any new facilities or the physical alteration to any existing governmental facility.
The additional residents and employees associated with the proposed Project would result in an increase in emergency medical responses. The proposed Project is located within the response district for BLS 21, which currently averages about 335 calls per month. The Glendale Fire Department estimates that the proposed Project would generate approximately 120 additional calls per year or about 12 additional calls per month. The City of Glendale has no formal service ratios or performance objectives for rescue ambulance service, but has considered a performance workload of 350 responses per month for a paramedic rescue ambulance. With the inclusion of these additional calls for service, BLS 21 would be responding to approximately 347 calls per month. Since this number of calls would not exceed the recommended workload for a rescue ambulance, the impact of the proposed Project on emergency medical services is less than significant.

The proposed residential development would install a fire sprinkler system. The proposed building would connect to a water supply system capable of meeting City of Glendale Fire Code requirements for sprinklered buildings. Additionally, the proposed Project would comply with all applicable fire codes and ordinance requirements for construction, access, water mains, fire hydrants, and fire flows, which are addressed during the building permit stage. City of Glendale policy requires upgrades to water lines serving new development to meet minimum fire flow requirements for new development.

Impact: Would the project result in substantial adverse 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 police protection.

Finding: The City finds that the Project will not result in substantial adverse 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 police protection, therefore no mitigation is required.

Project implementation would result in the addition of approximately 398 new residents to the City of Glendale. The addition of these new residents would reduce the present officer-to-population service ratio of 1.23 officers per 1,000 residents by less than 1 percent; therefore, the ratio would remain 1.23 officers per 1,000 residents with the addition of the proposed Project's 398 new residents. While this change is not substantial, implementation of the proposed Project
would result in the City of Glendale remaining below the 2.0 officers per 1,000 residents standard. Based upon the ideal officer-to-population standard, the proposed Project would require 0.6 additional officer. To maintain the existing officer-to-resident ratio, the proposed Project would require 0.5 additional officer.

Funding for the City’s police department is derived from various types of tax revenue which are deposited in the City general fund. The City Council then allocates the revenue for various public infrastructure improvements, services, and facilities that the City provides, including police services. As the proposed Project is developed, tax revenues from commercial property and sales taxes would be generated and deposited in the City general fund and the state treasury. A portion of these revenues would then be allocated to the City police department during the City annual budget process to maintain staffing and equipment levels within the City in numbers adequate to serve project-related increases in service call demands.

I. Recreation

**Impact:** Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

**Finding:** The City finds that the Project will not include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment, therefore no mitigation is required.

The proposed Project would provide residents with several recreational amenities, including a swimming pool and a fitness center. These recreation facilities are incorporated into the Project design and would be constructed concurrently with the overall development of the Project. The short-term impacts associated with the construction of these facilities are addressed in Sections 4.2, Air Quality; 4.5 Greenhouse Gases; 4.7, Noise; and 4.9, Traffic. Construction of these recreational facilities would not result in significant impacts, but it would contribute to the overall construction impacts.

J. Traffic, Circulation and Parking

**Impact:** Would the project cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections).

**Findings:** The City finds that the Project would not cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system, therefore no mitigation is required.
To minimize potential conflicts between construction activity and through traffic, a Construction Traffic Control Plan would be developed for use during Project construction. The Construction Traffic Control Plan would identify all traffic control measures, signs, and delineators to be implemented by the construction contractor through the duration of demolition and construction activity. Finally, a truck haul route program would also be implemented to minimize conflicts between haul trucks traveling to and from the project site, and through traffic on roadways surrounding the project. The program shall specify access points to the Site and delineate approved haul routes. In addition, the City of Glendale Department of Public Works will review and be responsible for approval of the proposed Truck Haul Route program. In addition to approval of the Truck Haul route program and the construction traffic control plan, the following design features will be incorporated into the proposed Project:

- Maintain existing access for land uses in proximity of the Site
- Limit any potential lane closures to off-peak travel periods
- Schedule receipt of construction materials during non-peak travel periods, to the extent possible
- Coordinate deliveries to reduce the potential of trucks waiting to unload for extended periods
- Prohibit parking by construction workers on adjacent streets and direct construction workers to available parking as determined in conjunction with City staff

Because of these requirements and since construction-related trips would be relatively limited during the AM and PM peak hours, construction-related transportation impacts due to the construction of the Project would be less than significant.

Traffic impacts at the study intersections were analyzed for the following conditions:

- Existing conditions.
- Existing Plus Project Conditions.
- Year 2016 Pre-Project Conditions (Existing plus ambient growth and related projects traffic).
- Year 2016 with Project Conditions.

The traffic volumes for each new condition were added to the volumes in the prior condition to determine the change in capacity utilization at the study intersections. The five studied intersections would operate at acceptable levels of service under all analyzed scenarios.
Impact: Would the project exceed, either individually or cumulatively, a Level of Service standard established by the county congestion management agency for designated roads or highways.

Finding: The City finds that the Project will not exceed, either individually or cumulatively, a Level of Service standard established by the county congestion management agency for designated roads or highways, therefore no mitigation is required.

Intersections - There is no CMP intersection monitoring location in the Project vicinity. The CMP TIA guidelines require that intersection monitoring locations must be examined if the proposed Project will add 50 or more trips during either the AM or PM weekday peak hours (of adjacent street traffic). The proposed Project will not add 50 or more trips during the AM or PM peak hours at any CMP monitoring intersections which is the threshold for preparing a traffic impact assessment, as stated in the CMP manual.

Freeways - The CMP TIA guidelines require that freeway-monitoring locations must be examined if the proposed Project will add 150 or more trips (in either direction) during either the AM or PM weekday peak periods. The proposed Project will not add 150 or more trips (in either direction) during either the AM or PM weekday peak hours to the CMP freeway monitoring locations, which is the threshold for preparing a traffic impact assessment, as stated in the CMP manual. Therefore, Project impacts would be less than significant.

Caltrans Freeway Impact Analysis - A supplemental freeway analysis was prepared based on the latest edition of the Highway Capacity Manual (HCM 2010) operational analysis methodologies pursuant to the California Department of Transportation’s (Caltrans) Guide for the Preparation of Traffic Impact Studies. Two mainline freeway segments were identified for analysis: I-5 Freeway north of Los Feliz Boulevard and I-5 Freeway south of Glendale Boulevard. Two study freeway segments are presently operating at LOS E or better during the weekday AM and PM peak hours under existing conditions. With the addition of the proposed Project traffic, all study freeway segments are expected to continue to operate at LOS E or better during the weekday AM and PM peak hours. Application of the Caltrans LOS standards and guidelines to the “Existing with Project” scenario indicates that the proposed Project is not expected to create significant impacts at any of the study freeway segments. Incremental, but not significant, traffic impacts are noted at the study freeway segments.

Transit - The Project trip generation, as shown in Table 4.9-4 of the Draft EIR, was adjusted by values set forth in the CMP to estimate transit trip generation. As discussed under subsection Existing Public Bus Transit Service, 10 bus transit lines and routes are provided adjacent to or
in close proximity to the Site. These 10 transit lines provide service for an average (i.e., average of the directional number of buses during the peak hours) of approximately 71 buses during the weekday PM peak hour. Therefore, based on the above calculated weekday PM peak hour transit trips, this would correspond to an average less than one new transit rider per bus due to the proposed Project. It is anticipated that the existing transit service in the Project area will adequately accommodate the Project generated transit trips. Thus, given the low number of generated transit trips per bus, no impacts on existing or future transit services in the Project area are expected to occur as a result of the proposed Project.

**Impact:** Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

**Impact:** Would the project result in inadequate emergency access.

**Finding:** The City finds that the Project will not exceed, either individually or cumulatively, a Level of Service standard established by the county congestion management agency for designated roads or highways, therefore no mitigation is required.

The proposed Project would use the existing network of regional and local roadways located in the vicinity of the project site. Based on consultation with the City of Glendale Traffic and Transportation Division staff and the findings of the traffic analysis, no street improvements are necessary as part of the proposed Project.

Access to commercial and residential guest parking for the Project would be provided via two driveways, one along San Fernando Road and a second, which would be located along the public alley. The driveway along San Fernando Road would be sited to allow safe turning movements into both the adjacent CVS Pharmacy parking lot and the Glendale Triangle project located on the east side of San Fernando Road across from the Site.

Residential access to the subterranean garage would be provided via one driveway along the public alley. All Project driveways would be 24 feet in width, would accommodate left- and right-turn ingress and egress turning movements from the Site and would be stop sign controlled. Curbside loading activities for the proposed Project would occur along the property frontages on San Fernando Road. The curbs would be painted appropriately to designate loading areas. The City will require a 2-foot widening to create the loading zone.

The Project has a high level of accessibility for emergency vehicles, both from a regional and a Site perspective. Central Avenue, San Fernando Road, and Los Feliz Road provide direct
routes to the Site for emergency vehicles. Smaller emergency vehicles, such as police cars and ambulances, would be able to access the subterranean parking structure as necessary.

**Impact:** Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks).

**Finding:** The City finds that the Project would not conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks), therefore no mitigation is required.

The proposed Project is supportive of alternative transportation and would encourage the alternative transportation options available within 0.25 mile of the project, including bus service and the Glendale Transportation Center. In addition, the Project would enhance the pedestrian experience adding new open area arcades and similar features at the ground level to create street level interest and activity. Therefore, the Project would not conflict with adopted policies, plans, or programs supporting alternative transportation, and impacts would be less than significant.

**K. Water**

**Impact:** Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.

**Finding:** The City finds that the Project will have sufficient water supplies available to serve the project from existing entitlements and resources, therefore no mitigation is required.

Short-Term Construction Water Demand — Demolition, grading, and construction activities associated with the proposed Project would require the use of water for dust control and cleanup purposes. The use of water for construction purposes would be short-term in nature and the amount would be much less than water consumption during the proposed Project operation. Therefore, construction activities are not considered to result in a significant impact on the existing water system or available water supplies.

Long-Term Operational Water Demand — New development on the Site would result in an increase in demand for operational uses, including landscape irrigation, maintenance and other activities on the site. Water demand for the proposed Project would be approximately 47.3 acre-feet per year. Even with implementation of the proposed Project, the City would continue to have adequate supply to meet Citywide demand under normal and drought conditions. As a result, long-term impacts to water supply during operation of the proposed Project under both normal and drought conditions would be less than significant.
L. Sewer

Impact: Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Finding: The City finds that the Project will not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects, therefore no mitigation is required.

Wastewater from the Project site goes first to the Los Angeles/Glendale Water Reclamation Plant and then to the Hyperion Treatment Plant if there is not sufficient capacity at the Los Angeles/Glendale Water Reclamation Plant, which the City has access to through the Amalgamated Agreement. With the Hyperion Treatment Plant currently operating 240 mgd below capacity, adequate capacity exists to treat proposed Project-generated effluent of 19,848 gallons per day. Therefore, the proposed Project would not require the expansion or construction of sewage treatment facilities, the construction of which could cause significant environmental effects. No significant impact would result with regard to impacts to the available sewage treatment capacity.

M. Solid Waste

Impact: Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs.

Finding: The City finds that the Project will be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs, therefore no mitigation is required.

Construction – Construction of the Project would involve site preparation activities (e.g., demolition and building) that would generate waste materials. The one-time disposal of 3,544 cubic yards of demolition debris generated by the Project would be served by the certified facilities; therefore, the impact of the Project on the certified facilities would be less than significant.

Operation – A total of approximately 97 tons of solid waste per year is projected to be disposed of into landfills at the buildout of the proposed Project. This would represent an increase of approximately 70 tons per year over the estimated 27 tons generated annually by existing development on the Site. Solid waste generated on the Site could be deposited at the Scholl Canyon Landfill, which is owned by the City, or one of the landfills located within the County of Los Angeles. Combined with the increase of approximately 61 tons per year in solid waste generated by the proposed Project, the annual disposal amount would increase to
approximately 230,061 tons per year. With a total annual disposal amount of 230,061 tons and a remaining capacity of 4.1 million tons, the Scholl Canyon facility would meet the needs of the City and the proposed Project for approximately 17.8 years. The City is pursuing options to expand capacity at the Scholl Canyon Landfill, which would extend its remaining life. An EIR is being prepared to evaluate the impacts of such an expansion, which would involve increasing the final elevation at the landfill without expanding the area covered thereby. The Scholl Canyon facility would have sufficient capacity to continue to accommodate the demand for Class III disposal facilities generated by the Site. As such, the increase in solid waste generation associated with the operation of the proposed Project would not exacerbate landfill capacity shortages in the region to the point of altering the projected timeline of any landfill to reach capacity.

10. **SIGNIFICANT IMPACTS IDENTIFIED IN THE EIR THAT ARE REDUCED TO LESS THAN SIGNIFICANT BY MITIGATION MEASURES INCORPORATED INTO THE PROJECT.**

The EIR identified the following significant Project impacts which are reduced to a less than significant level by mitigation measures identified below. The impacts and mitigation measures identified are fully disclosed in the final EIR, which in turn is based upon substantial evidence. The City finds that the significant environmental impacts, with incorporation of the mitigation measures set forth below, will be mitigated to a less than significant level.

**A. Cultural Resources**

*Impact: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.*

*Finding: The City finds that although there are no known prehistoric and historic archaeological sites in the local area, such sites may have existed such that Project construction activities could unearth undocumented resources and cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. However, with the adoption and implementation of Mitigation Measure 4.3-1 the potential impacts on archaeological resources are reduced to a less than significant level.*

Prehistoric and historic archaeological sites are not known to exist within the local area. In addition, the Site has been subject to extensive disruption and contains fill materials. Any archaeological resources that may have existed at one time have likely been previously disturbed. Nonetheless, construction activities associated with Project implementation would have the potential to unearth undocumented resources and result in a significant impact. In the
event that archaeological resources are unearthed during Project subsurface activities, all earth-
disturbing work within a 200-meter (656-foot) radius will be temporarily suspended or redirected
until an archaeologist has evaluated the nature and significance of the find. After the find has
been appropriately mitigated, work in the area may resume. Implementation of this standard
requirement, which is incorporated as mitigation, would reduce potential impacts to a less than
significant level.

Mitigation measure 4.3-1 as set forth in the Mitigation, Monitoring and Reporting Program
attached hereto as Attachment “B”, would reduce the significant Project impact to a less than
significant level.

Impact: Directly or indirectly destroy a unique paleontological resource or site or unique geologic
feature.

Finding: The City finds that Project construction could potentially unearth a
paleontological resources or expose a unique geologic feature, however, with implementation of Mitigation Measure 4.3-2 the potential
impacts on a unique paleontological resource or site or unique geologic feature is reduced to a less than significant level.

Deposits of older Quaternary Alluvium exist on the Site at unknown depths, which could contain
paleontological resources. However, the Site has already been subject to extensive disruption
due to previous development. Surface grading or very shallow excavations in the younger
Quaternary Alluvium exposed at the Site would most likely not uncover significant vertebrate
fossil remains or any superficial paleontological resources. However, deeper excavations that
extend into older Quaternary deposits may encounter significant fossil vertebrate specimens
and significant impact could occur with the implementation of the Project. In the event that
paleontological resources are unearthed during Project subsurface activities, all earth-disturbing
work within a 100-meter (328-foot) radius must be temporarily suspended or redirected until a
paleontologist has evaluated the nature and significance of the find. After the find has been
appropriately mitigated, work in the area may resume. Any fossils recovered during mitigation
should be deposited in an accredited and permanent scientific institution for the benefit of
current and future generations. Implementation of this standard requirement, which is
incorporated as mitigation, would reduce potential impacts to a level that is less than significant.

Mitigation measure 4.3-2 as set forth in the Mitigation, Monitoring and Reporting Program
attached hereto as Attachment “B”, would reduce the significant Project impact to a less than
significant level.

Impact: Disturb any human remains, including those interred outside of formal cemeteries.
Finding: The City finds that although there are no known human remains or traditional burial sites within the Project site, but that such remains and sites may have existed such that Project construction activities could unearth them, however, with implementation of Mitigation Measure 4.3-3 the potential impacts on any human remains or traditional burial sites is reduced to a less than significant level.

The Site and surrounding area are characterized by features typical of the urban landscape and include retail-commercial and medical uses. No known traditional sites exist within the Project area or surrounding area, nor have any resources been identified. Nonetheless, if encountered during excavation and grading activities, any discovery of such resources would be treated in accordance with state and federal guidelines for disclosure, recovery, and preservation, as appropriate. Implementation of this standard requirement, which is incorporated as mitigation, would reduce potential impacts to a level that is less than significant.

Mitigation measure 4.3-3 as set forth in the Mitigation, Monitoring and Reporting Program attached hereto as Attachment "B", would reduce the significant Project impact to a less than significant level.

B. Geology and Soils

Impact: 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.

Finding: The City finds that while the Project is not 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, that such hazards could and create a significant impact but for implementation of Mitigation Measure 4.4-1 which will reduce any potential impacts to less than significant level.

While Project development would not result in the hazards such as landslide, lateral spreading, subsidence, liquefaction, or collapse, the Geotechnical Investigation Report prepared for the Project included design and construction recommendations. Without implementation of the geotechnical recommendation, a potentially significant impact could occur. Therefore, design and construction recommendations provided in the Geotechnical Investigation Report shall be implemented as mitigation and impacts would be reduced to less than significant.

Mitigation measure 4.4-1 as set forth in the Mitigation, Monitoring and Reporting Program attached hereto as Attachment "B", would reduce the significant Project impact to a less than significant level.
C. Public Services

Impact: 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 fire protection services.

Finding: The City finds that adoption of Mitigation Measures 4.8.1-1 will ensure that impacts resulting in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities would be less than significant.

The intensification of land uses associated with the proposed Project and related projects would result in an increase in emergency medical responses throughout the City. The cumulative increase in calls for emergency medical response from related projects, when added to those associated with the proposed Project, would result in rescue ambulances responding to a number of calls, and would likely exceed the recommended workload of 350 calls per month for a rescue ambulance, specifically for RA 26. However, many of the related projects will take several years to be constructed, and some may not be constructed at all due to changes in the economic climate or other factors. Further, each project that is constructed will be required to pay appropriate fees to the City of Glendale. As a result, the City will have sufficient time to plan appropriately for emergency medical needs. The Fire Department has indicated that they are pursuing additional EMS resources. Therefore impacts would be cumulatively considerable. The contribution of the Project to this impact would be cumulatively considerable and, therefore, significant.

Mitigation measure 4.8.1-1 as set forth in the Mitigation, Monitoring and Reporting Program attached hereto as Attachment "B", would reduce the significant cumulative impact to a less than significant level.

Impact: The project would result in a substantial adverse impact 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 police protection.

Finding: The City finds that adoption of Mitigation Measure 4.8.2-1 will ensure that impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, would be less than significant.
The proposed Project would not result in impacts to the Glendale Police Department. However, the addition of additional residents and employees as a result of the proposed Project and related projects could result in a cumulative impact on police protection services when considering current department resources as the police department is currently well below the suggested 2.0 offices per 1,000 resident performance objective. With future funding from the General Fund as described above, and proposed mitigation provided below, impacts to police services in the City would be less than significant and the incremental effect of the proposed Project to this impact would not be cumulatively considerable.

Mitigation measure 4.8.2-1 as set forth in the Mitigation, Monitoring and Reporting Program attached hereto as Attachment "B", would reduce the significant Project impact to a less than significant level.

D. Sewer

Impact: 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.

Finding: The City finds that with implementation Mitigation Measure 4.10.2-1 the Project will not result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

The Project is expected to increase wastewater flows on the Site from 2,350 gallons per day to 19,848 gallons per day. Since the payment of the sewer capacity fee is available to reduce the severity of the impact of the proposed Project on sewer capacity, the impact of the proposed Project on the existing sewage conveyance system would be reduced to a less than significant level.

Mitigation measure 4.10.2-1 as set forth in the Mitigation, Monitoring and Reporting Program attached hereto as Attachment "B", would reduce the significant Project impact to a less than significant level.

Impact: 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.

Finding: The City finds that adoption of Mitigation Measure 4.10.2-2 will ensure that the Project will not exceed the wastewater treatment provider's capacity.
Development of the related projects would place additional demand on the City's sewage conveyance system. Sewage conveyance infrastructure serving the individual related projects may not have adequate capacity to handle additional sewage loads, and such lack of capacity represents a significant impact. In order to alleviate sewer impacts, the City would impose a sewer capacity capital improvement fee on all future developments adding demand for capacity of the sewer system. The fee would be charged when development of a parcel leads to an increase in the volume of wastewater discharged to the collection system. The City has elected to calculate these fees based on proportional increases in wastewater flow. The collected fees would be deposited into a specially created account to be used to fund capacity improvements of the specific drainage basin. The City would undertake a new hydraulic analysis of the specific drainage basin every five years from the date of the first deposit into the special account. In the event the City receives proposals for new developments not considered in the current hydraulic analysis, intermediate and more frequent hydraulic analyses would be performed to evaluate capacity in the given drainage basin. The Public Works Director requests consideration from the City Council to budget the funds for the balance of the cost of increasing the sewer capacity for any of the drainage basins, as part of its annual Capital Improvement Program when it determines such action to be appropriate and justifiable. The City's Public Works Engineering Division would then be able to design and construct the necessary improvements. Since the payment of the sewer capacity increase fee is available to reduce the severity of the impact of the proposed Project and related projects' on sewer capacity, the impact of proposed Project and related projects' on the existing sewage conveyance system would be reduced to less than significant.

Mitigation measure 4.10.2-2 as set forth in the Mitigation, Monitoring and Reporting Program attached hereto as Attachment "B", would reduce the significant Project impact to a less than significant level.

11. **Significant Unavoidable Environmental Effects Which Cannot Be Mitigated To A Level Of Insignificance.**

Section 21081(a) of the Public Resources Code and section 15091(a) of Title 14 of the California Code of Regulations require a public agency to make specific findings that significant environmental effects identified in the EIR have been avoided and/or mitigated to a less than significant level prior to approving a project. Where a public agency cannot make such a finding, due to the existence of significant and unavoidable environmental impacts, the agency is required to balance the economic, legal, social, technological or other benefits of the project against its unavoidable environmental risks.
when determining whether to approve the project. An agency may determine that any significant effects are unavoidable and acceptable due to overriding considerations set forth by the agency at the time of project approval.

The EIR identified the following significant and unavoidable adverse impacts associated with Project approval, and identified related mitigation measures. The City hereby finds that these significant and unavoidable adverse impacts are outweighed by the public benefits provided by the proposed Project, and are acceptable, as more fully specified in the Statement of Overriding Considerations.

A. Noise

*Impact: result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels*

*Finding: The City finds that with adoption and implementation of Mitigation Measures 4.7-1, 4.7-2, the Project will reduce but not avoid exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels. The City finds this significant impact to be acceptable for the reasons set forth in the Statement of Overriding Considerations.*

Pile drivers and large bulldozers are capable of producing approximately 87 and 81 VdB, respectively, at 50 feet, the approximate distance to the nearest structure. The closest existing use where vibration levels could be experienced by a sensitive interior use is Glendale Memorial Hospital, which is located approximately 570 feet northeast of the Site. Although CEQA requires a comparison between the Project and conditions as they currently exist, in this case, the nearby Glendale Triangle project is also being considered in the analysis. The Glendale Triangle project is currently under construction and could be occupied with residential uses by the time construction begins on the proposed Project. The Glendale Triangle project is located approximately 100 feet from the property line of the Site. Vibration at the future mixed-use residential project adjacent to the Site would be above the 72 VdB threshold for residences and buildings where people normally sleep during short-term construction activities, depending on the equipment in use. Groundborne vibration generated from the construction of the proposed Project at these receptor locations would be significant.

Mitigation measures 4.7-1, 4.7-2 as set forth in the Mitigation, Monitoring and Reporting Program attached hereto as Attachment “B”, are provided to reduce impacts, however, even with implementation of these mitigation measures, the impact remains significant.
Impact: Would result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

Finding: The City finds that even with adoption and implementation of Mitigation measures 4.7-3, 4.7-4, 4.7-5, the Project will result in a substantial temporary increase in excessive groundborne vibration levels. The City finds this significant impact to be acceptable for the reasons set forth in the Statement of Overriding Considerations.

Equipment used during the construction phases would generate both steady-state and episodic noise that would be heard both on and off the Site. Noise levels generated during construction would primarily affect the patrons of the commercial and offices uses adjacent to the Site, as well as residents immediately east and surrounding the Site. Construction activities associated with the proposed Project would be located approximately 100 feet from the residential mixed-use Glendale Triangle Project that is expected to be complete, and may be occupied, when the proposed Project is under construction. Potential construction-related noise impacts are considered significant due to exceeding the noise threshold of 65 dB(A) as allowed by the Municipal Code.

Mitigation measures 4.7-3, 4.7-4, 4.7-5 as set forth in the Mitigation, Monitoring and Reporting Program attached hereto as Attachment “B”, are provided to reduce impacts, however, even with implementation of these mitigation measures, the impact remains significant.

B. Recreation

Impact: 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.

Finding: The City finds that even with the adoption and implementation of Mitigation Measures 4.8.3-17-1, and the payment of development impact fees for parks and recreation facilities, the Project will 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. The City finds this significant impact to be acceptable for the reasons set forth in the Statement of Overriding Considerations.

Implementation of the proposed Project would result in an estimated population increase of approximately 398 new residents within the City of Glendale. This increase in population would incrementally increase the use of existing neighborhood and community parks in the City. Impacts would be most pronounced at the Adult Recreation Center/Central Park, which is the...
closest facility to the Site. The City currently has a park land-to-resident ratio of approximately 1.48 acres of parkland for every 1,000 residents, while the City's park planning standard is 6 acres of neighborhood and community parkland per 1,000 residents. Even with implementation of all parkland under development, the parkland-to-resident ratio would remain relatively the same. Based upon the ideal park land-to-resident ratio standard, the proposed Project would require 1.7 additional acres. To maintain the existing park land-to-resident ratio, the proposed Project would require 0.3 acre.

The proposed Project would provide approximately 13,000 square feet of common open space. The northern portion of the Site would include a small courtyard that would include seating and landscaping. The main recreational open space would consist of approximately 8,000-square-foot podium courtyard and would feature an outdoor pool, spa, and associated seating area. Additional recreational facilities include a fitness center and a clubhouse, which would be located adjacent to the main recreational open space.

The 7,000 square feet of private open space would consist of patios and balconies that would be provided for each residential unit. These amenities would partially serve to reduce demand for public recreation facilities by proposed Project residents. However, the public open and park space and private recreation facilities included in the proposed Project would not meet the needs of proposed Project residents for neighborhood or community parks.

Existing park facilities are currently heavily used due to the deficit in parkland in the City. The increase in use of neighborhood and community parks in the City that would result from the increase in residents and employees associated with the proposed Project is considered significant. However, the proposed Project would be required to comply with Ordinance No. 5575 (the Ordinance), which established Development Impact Fees on new development in order to provide parks, park facilities, and library facilities. The Ordinance was adopted to minimize further deficiency in the City's park and recreation facilities and to maintain the current parkland to population ratio. It applies to residential, commercial, office, and industrial development projects within the City. The Project applicant would be required to pay Development Impact Fees to assist in funding capital improvement projects, upgrades to existing recreational facilities, and acquisition and development of new park and recreation facilities around the Project site. These fees are payable 50 percent at the time of permit issuance and the remaining 50 percent at issuance of Certificate of Occupancy. Fees are payable at the rate in effect at the time the payment is due.
Consistent with the adopted Development Impact Fee schedule, the proposed Project would be required to pay the phase-in fees of $7,000 per unit for residential uses and $2.67 per square foot of commercial uses. The development impact fee payments are required to minimize the proposed Project’s impact on park and recreation land and facilities and library facilities. Under CEQA, the development impact fee payments constitute mitigation of proposed Project-related impacts on park and recreation land and facilities within Glendale. However, the fee payment is not considered “full” mitigation, because the Project’s fee payment does not equal the full fair-share per-unit fee for multi-family residential projects, which amounts to $14,251 per multi-family unit and $5.04 per square foot for commercial under the City’s Public Facilities Fee Study (June 2007). Under the adopted Development Impact Fee Schedule, the proposed Project would be required to pay a total of approximately $1,042,327 in fees (142 units x $7,000 = $994,000; and 18,100 square feet of commercial space x $2.67 per square foot = $48,327; $994,000+ $48,327= $1,042,327) if paid prior to the schedule fee increase in December 2014. The Development Impact Fee program was viewed as a means of accomplishing the City's overall planning objectives, which include revitalizing the San Fernando Corridor, and providing housing opportunities in a downtown urban setting near to employment opportunities, public transportation, and public facilities and services, but without impeding or frustrating new development in Glendale due to the imposition of new full-share development impact fees.

Mitigation measure 4.8.3-1 as set forth in the Mitigation, Monitoring and Reporting Program attached hereto as Attachment “B”, is provided to reduce impacts, however, even with implementation of this mitigation measure, the impact remains significant

C. Solid Waste

Impact: Not be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs.

Finding: The City finds that the project and related projects will not be served by a landfill with sufficient permitted capacity to accommodate the their solid waste disposal needs. The City finds this significant impact to be acceptable for the reasons set forth in the Statement of Overriding Considerations.

Development of related projects would dispose of a projected 2,649 tons of solid waste into landfills every year. Combined with the additional annual tonnage of solid waste generated by the proposed Project, the cumulative amount generated by new projects would be approximately 2,739 tons of solid waste per year. The Project, in combination with other development, could contribute to insufficient permitted disposal capacity by contributing...
additional solid waste to regional landfills. Development under the Project would also contribute construction debris to regional landfills, increasing the cumulative effect. Therefore, the Project's contribution to the cumulative impact would be considered cumulatively considerable, and would be a significant and unavoidable impact.

12. **SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES ANALYZED IN THE EIR.**

Section 15126.2 of Title 14 of the California Code of Regulations states that use of nonrenewable resources during the initial and continued phases of a project may be irreversible if a large commitment of these resources makes their removal, indirect removal, or non-use thereafter unlikely. The EIR analyzed whether the Project would result in the irretrievable commitment of resources, or would cause irreversible changes in the environment, and, also in accordance with section 15126.2, identified any irreversible damage that could result from environmental accidents associated with the proposed Project.

13. **IRREVERSIBLE COMMITMENT OF RESOURCES.**

Construction and operation of the Project would contribute to the incremental depletion of resources, including renewable and non-renewable resources. Resources, such as lumber and other forest products, are generally considered renewable resources. Such resources would be replenished over the lifetime of the Project. For example, lumber supplies are increased as seedlings mature into trees. As such, the development of the Project would not result in the irreversible commitment of renewable resources. Nevertheless, there would be an incremental increase in the demand for these resources over the life of the Project.

Non-renewable resources, such as natural gas, petroleum products, asphalt, petrochemical construction materials, steel, copper and other metals, and sand and gravel are considered to be commodities that are available in a finite supply. The processes that created these resources occur over a long period of time. Therefore, the replacement of these resources would not occur over the life of the Project. To varying degrees, the aforementioned materials are all readily available and some materials, such as asphalt or sand, and gravel, are abundant. Other commodities, such as metals, natural gas, and petroleum products, are also readily available, but they are finite in supply, given the length of time required by the natural process to create them.

The demand for all such resources is expected to increase regardless of whether or not the Project is developed. The Southern California Association of Governments (SCAG) forecasts that the population of Southern California will increase 23 percent between 2008 and 2035. These increases in population would directly result in the need for more residential and retail-
commercial facilities in order to provide the needed services associated with this growth. If not consumed by this Project, these resources would likely be committed to other projects in the region intended to meet this anticipated growth. Furthermore, the investment of resources in the Project would be typical of the level of investment normally required for residential and retail-commercial uses of this scale. Mitigation measures have been included in this EIR to reduce and minimize Project and cumulative impacts.

14. **IRREVERSIBLE ENVIRONMENTAL CHANGES.**

Irreversible long-term environmental changes associated with the proposed Project would include a change in the visual character of the site as a result of the conversion of the San Fernando Corridor to newer residential and retail-commercial uses. Additional irreversible environmental changes would include the increase in local and regional vehicular traffic, and the resultant increase in air pollutants and noise emissions generated by this traffic, among other impacts. Design features have been incorporated into the development proposal and mitigation measures are proposed in the Final EIR that would minimize the effects of the environmental changes associated with the development of the project to the maximum degree feasible. In addition, the project site is an urban site already and the implementation of the project would improve this location of the City. Even with this being the case, the Project would result in significant and unavoidable short-term noise impacts during construction and recreation impacts during operation.

15. **POTENTIAL ENVIRONMENTAL DAMAGE FROM ACCIDENTS.**

The Project proposes no uniquely hazardous uses, and its operation would not be expected to cause environmental accidents that would affect other areas. The Project site is located within a seismically active region and would be exposed to ground shaking during a seismic event. Conformance with the regulatory provisions of the City of Glendale, the Uniform Building Code, and all other applicable building codes pertaining to construction standards would minimize, to the extent feasible, damage and injuries in the event of such an occurrence. Given the existence of older structures on the project site, asbestos-containing building material (ACBM), lead paint, light ballasts/polychlorinated biphenyls (PCB), and soil contamination may be of concern on the project site. Because development of the Project would require the demolition/dismantling and removal of all the existing structures located on the Site, these materials could cause health and safety problems to on-site construction workers and the community. Project design features provided below, in addition to Mitigation Measure 4.4-1, are included and would be implemented as part of the Project. The inclusion of these features would reduce potential impacts to a less than significant level.
• All hazardous materials delivered and hazardous waste removed from the project site shall be in accordance with Title 49 of the Code of Federal Regulations.

• Geotechnical recommendations 7.1 through 7.11 contained in Section 7.0, Recommendations, of the Geotechnical Investigation Report prepared for the proposed Project by Garcrest Engineering and Construction, Inc., dated May 2013, shall be implemented during Project construction.

16. GROWTH INDUCING IMPACTS OF THE PROJECT.

Section 15126.2(d) of Title 14 of the California Code of Regulations requires consideration of the ways in which a Project could directly or indirectly foster economic growth, population growth, or the construction of additional housing in the surrounding environment.

In general terms, a Project may foster spatial, economic, or population growth in a geographic area if it meets any one of the following criteria:

• The project removes an impediment to growth (e.g., the establishment of an essential public service or the provision of new access to an area)

• The project results in the urbanization of land in a remote location (leapfrog development)

• Economic expansion or growth occurs in an area in response to a project (e.g., changes in revenue base, employment expansion, etc.)

• The project establishes a precedent-setting action (e.g., a change in zoning or general plan amendment approval)

Should a project meet any one of these criteria, it can be considered growth inducing under CEQA. An evaluation of this Project compared against these growth-inducing criteria is provided below.

Removal of an Impediment to Growth:

Growth in an area may result from the removal of physical impediments or restrictions to growth, as well as the removal of planning impediments resulting from land use plans and policies. In this context, physical growth impediments may include nonexistent or inadequate access to an area or the lack of essential public services (e.g., water service), while planning impediments may include restrictive zoning and/or general plan designations.
The Project area contains established land uses and supporting infrastructure. The construction of proposed uses would require the modification and/or improvement of existing infrastructure in order to support the increased land use intensity associated with the Project. Such modifications and improvements to infrastructure are discussed in further detail below. Given the urban nature of the site and surroundings, and the existence of established infrastructure, no growth-inducing impacts would result from Project development.

An established transportation network exists in the surrounding area that offers local and regional access to the project site. Access to the residential guest and commercial parking on the Project would be provided via one driveway along San Fernando Road and residential access to the subterranean garage would be provided via one driveway along the public alley. All Project driveways would be 24 feet in width, would accommodate left-turn and right-turn movements for both ingress to and egress from the site and would be stop sign controlled.

The water and energy (electricity and natural gas) infrastructure required to support the proposed Project would be available to the project site from surrounding streets. Existing water lines serving the Site include an 8-inch main in San Fernando Road, 6-inch main in Los Feliz Road, and an 8-inch main in Central Avenue. No new water mains other than those required to serve the Site would be constructed. As such, the development of on-site water infrastructure to serve the Project would not induce growth within the area.

Electricity and natural gas transmission infrastructure presently exists on, and in the vicinity of, the Site. Development of the Project would necessitate the construction of an on-site distribution system to convey this energy to uses on the Site. This system would be designed to accommodate the uses proposed within the Project, and would not extend beyond the requirements or boundary of the Project. The on-site service lines would be sized to meet the demands of the proposed Project. No growth inducing impacts, due to the extension of electrical or natural gas service lines, would occur with the development of the Project.

Concerning sewer infrastructure, an existing wastewater collection system serves the project site and consists of an 8-inch sewer lines located in San Fernando Road, Los Feliz Road, and Central Avenue. City of Glendale policy requires upgrades to sewer lines serving new development as needed to accommodate increases in the volume of wastewater discharged to the collection system.

In summary, the design and construction of roadway, water, sewer, electrical, and natural gas infrastructure needed to accommodate the Project would not induce growth within undeveloped areas surrounding the Project area.
Urbanization of Land in Remote Locations (Leapfrog Development):

Under this criterion, the Project would be considered growth inducing if it would result in the urbanization of land in a remote location. This means that the development would not be contiguous to existing urban development and would "leap" over large areas of undeveloped land. The Site is located in a highly urbanized and built-out area. Because the Project is contiguous to existing urban development, it is not growth inducing under this criterion.

Economic Growth:

Under this criterion, the Project would be considered growth inducing if it would cause economic expansion or economic growth to occur in the project area. Examples of economic expansion or growth would include changed in revenue base, employment expansion, etc.

Buildout of the Project could result in temporary increases in construction-related job opportunities. Potential employees would likely be drawn from the existing labor force in the City of Glendale and the Los Angeles Metropolitan area.

Long-term growth, should it occur, would be primarily in the form of an economic response to the new residents that would occupy the Site. The increase of 398 people associated with proposed Project may result in a slight corresponding increase in demand for City goods and services. However, given the relatively small size of the Project in relation to City population, the economic contribution of this Project alone would not be considered growth inducing.

The proposed Project also includes approximately 11,600 square feet of commercial space. However, the existing uses on the site include approximately 39,340 square feet of existing commercial/industrial. Because the proposed Project would decrease the commercial space on the Site, it would not be expected to result in employment expansion on-site and therefore would not be growth inducing under this criterion.

Precedent-setting Action:

Changes from a project that could be precedent setting include (among others) approval of parking exceptions that could have implications for other properties or that could make it easier for other properties to develop.

The Site is currently designated as "Mixed Use" on the general plan land use map and zoned as Industrial Commercial/Residential Mixed Use (IMU-R) by the Municipal Code. This designation permits a mix of commercial and residential uses as well as exclusively commercial, industrial, or residential land uses. Similarly, a mix of commercial and residential uses is permitted under
the IMU-R zone subject to the provision that commercial uses are located along the street frontage for lots abutting San Fernando Road, Broadway, and Colorado Street. Therefore, the Project is consistent with the existing general plan and zoning designations and no General Plan Amendment or Zone Change is required. The proposed Project is requesting up to two concessions and a parking concession as allowed in the Municipal Code when seeking a density bonus. These concessions would not be considered precedent setting as they are allowed under the existing City requirements. Consequently, the Project is not considered to be considered growth inducing under this criterion.

17. **MITIGATION MONITORING AND REPORTING PROGRAM.**

The public agency approving a project must adopt a Mitigation Monitoring and Reporting Program ("MMRP") in order to ensure that the mitigation measures and project revisions identified in the EIR are implemented. The public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. This program has been designed to ensure compliance during Project implementation, and is fully enforceable through permit conditions, agreements and other measures, as required by section 21081.6 of the Public Resources Code.

The City finds that the impacts of the Project have been mitigated to the extent feasible by the mitigation measures identified in the EIR and the MMRP. By these findings, the City adopts the Project MMRP that accompanies the Final EIR as part of Project approval. The MMRP designates responsibility and anticipated timing for the implementation of mitigation and conditions within the jurisdiction of the City. Implementation of the mitigation measures specified in the final EIR and the MMRP will be accomplished through administrative controls over Project planning and implementation and monitoring and enforcement of these measures will be accomplished through verification by the City and periodic inspection.

City staff reserves the right to make amendments and/or substitutions to the mitigation measures or project design features, if it is determined that the amended or substituted measure or feature will mitigate the identified potential environmental impact to at least the same degree as the original measure or feature, or would attain an adopted performance standard for mitigation, and where the amendment or substitution would not result in a new significant impact on the environment which cannot be mitigated.

The City hereby finds that the Mitigation Monitoring and Reporting Program meets the requirements of Public Resources Code section 21081.6 by providing for the implementation,
monitoring and enforcement of mitigation measures intended to mitigate and/or eliminate potential environmental effects.

18. **ALTERNATIVES ANALYZED IN THE EIR.**

A reasonable range of alternatives to the Project which could feasibly attain the basic objectives of the Project must be described and evaluated. Included in this range of alternatives must be the no project alternative. The purpose of the alternatives analysis is to explain potentially feasible ways to avoid or minimize significant effects on the Project.

Alternatives may be eliminated from detailed consideration in the EIR if the alternative fails to meet most of the basic project objectives, is infeasible, and/or is unable to avoid significant environmental impacts. The alternatives eliminated from detailed consideration in the EIR, and the justifications for their elimination, are set forth below:

- **Off-Site Alternative**

An alternative site would involve the development of the Project at a different location. Given that neither the Project applicant nor the City owns or controls any other property in the vicinity of the proposed Site that is available for mixed-use development, the ability of the applicant to find and purchase an alternative site to develop the Project is considered speculative. In addition, the development of an alternative site may not be able to meet the project objectives in that it may not be located near transit or in the San Fernando Road Corridor. Lastly, the development of the same uses at a different location would likely result in similar construction-related noise and recreation impacts. Thus, the selection of an alternative site would not avoid significant impacts.

As indicated in CEQA 15126.6(c), "among factors that may be used to eliminate alternatives from detailed consideration in an EIR are (1) failure to meet most of the project objectives, (2) infeasibility, or (3) inability to avoid significant environmental impacts." As discussed above, the relocation of the Project to an alternative site would not be feasible because obtaining an alternative site is considered speculative, and because development on an alternative site would not necessarily avoid or substantially lessen any of the significant effects of the project. Therefore, this alternative has been eliminated from detailed consideration within this EIR.

The alternatives identified and subject to a detailed analysis in the EIR for the Project include:

- **The No Project/No Development Alternative ("Alternative 1").**
The No Project/No Development Alternative is required to be evaluated by Section 15126(2)(4) of the State CEQA Guidelines. As required by the State CEQA Guidelines, the analysis must examine the impacts which might occur if the site is left in its present condition, as well as what may reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

Under the No Project/No Development Alternative, the Site would not be developed with additional uses, and would remain in its current state. Existing retail, industrial/commercial uses, including parking, would remain. None of the impacts associated with construction and operational activities would occur if the No Project/No Development Alternative were selected. No short-term noise or groundborne vibration impacts would occur during construction, and no recreation impacts would occur as a result of this alternative. This alternative is environmentally superior to the proposed Project for these reasons.

This alternative would not attain the following objectives:

- Revitalize the San Fernando Road Corridor
- Create a diversity of residential and urban uses to activate and strengthen the vitality of southern Glendale
- Provide housing opportunities, pursuant to the City’s policy, in an urban setting in close proximity to employment opportunities, public transportation, public facilities, and goods and services
- Utilize architectural design, lighting, and landscape design within the residential component to complement and enhance the architectural character of the proposed building while also fitting into the existing fabric of the area and give the project site a distinctive and pleasing appearance
- Develop a Transit Oriented Development, thereby reducing the number of vehicles, creating localized employment, revitalizing the local neighborhood and providing a dynamic living environment

- Reduced Density/Reuse of 3901 San Fernando Road (“Alternative 2”).

The Reduced Density/Reuse Alternative considers development of the proposed Project while retaining the existing building located at 3901 San Fernando Road. Under this alternative the entire building at 3901 San Fernando Road would be retained. Alternative 2 would maintain the existing one- and two-story commercial building at the San Fernando Road and Central Avenue corner, and the building’s rooftop commercial advertising billboard. Parking for that building’s studio/industrial, retail, and office space would be provided within the adjacent new building.
The buildings on the remainder of the Site would be demolished and removed. Occupying the remaining 0.78-acre mid-block portion of the Site, the new building would provide 6,400 square feet of new retail space fronting San Fernando Road at the ground level, and 88 apartments in four stories above. There would be 56 one-bedroom and 32 two-bedroom apartments ranging from 600 to 972 square feet. Under this alternative, 4 affordable units would be provided. Alternative 2 would lessen the significant impacts associated with noise and vibration.

This alternative would meet the Project objectives, but to a lesser extent than the proposed Project because of the reduce size of Alternative 2. For instance, and as explained in more detail in Table 7.0-1 of the Final EIR, Alternative 2 would provide 4 affordable units, as opposed to the 12 units provided with the proposed Project, thereby meeting – but to a lesser extent – the Project Objective to provide affordable housing opportunities in the City. Alternative 2 would provide 6,400 square feet of rentable space, as opposed to 16,500 square feet in the proposed Project. As a result, Alternative 2 would not meet the Project Objective to increase demand for local retail space to the same extent as the Project. In addition, given the fact that the proposed Project would develop 54 fewer units than Alternative 2, the Project Objectives to provide housing opportunities in the City in close proximity to employment, public transportation, public facilities, goods and services and to develop a transit oriented development would be met, but to a lesser extent than the proposed Project.

However, the City has had the applicant’s development proforma independently reviewed and evaluated, and such analysis supports the determination that Alternative 2 is not economically feasible compared to the Project as described fully in the proforma and notes attached as Appendix F02 to the Final EIR. This data indicates that, assuming a mixed-use residential and retail development with Alternative 2’s features, this development would have a stabilized value of $27,880,160, total development costs of $27,601,224 and a combined residual land value (for both the retail and apartment parcels) of $1,386,998. Because the applicant acquired the parcels forming the Site at a price of $3.3 million, development of Alternative 2 would result in a shortfall of nearly $2 million between its residual land value and the cost of the land’s acquisition. When the total development costs of Alternative 2 and land acquisition cost are taken into account, development of Alternative 2 would result in a loss of over $3 million ($27,601,224 (development costs) + $3,300,000 (land acquisition cost) = $30,901,224 - $27,880,160 (stabilized value of development) = $3,021,064 in loss). In view of these shortfalls, development of Alternative 2 is financially infeasible compared to the Project.
Industrial Only ("Alternative 3").

The Industrial Alternative considers development of the entire site with only industrial uses. This alternative was formulated to reduce the significant noise and recreation impacts of the proposed Project by reducing the amount of development and population generated. Under this alternative, all on-site buildings would be demolished and removed. The layout for the land uses would result in the development of approximately 40,000 square feet of industrial space in a single story with surface parking. No subterranean parking would be included. By reducing the amount of development, the construction duration for this alternative would also be reduced. In addition, the absence of a residential component associated with this alternative would reduce the demand for parks and recreational facilities.

This alternative would not meet the following objectives of the Project:

- Create a diversity of residential and urban uses to activate and strengthen the vitality of southern Glendale
- Provide housing opportunities, pursuant to the City's policy, in an urban setting in close proximity to employment opportunities, public transportation, public facilities, and goods and services
- Develop a Transit Oriented Development, thereby reducing the number of vehicles, creating localized employment, gentrifying the local neighborhood and providing a dynamic living environment

Finding: Since none of the Alternatives would meet the Project objectives to the same extent as the Project and also reduce Project impacts, the City finds that adoption of the Project is considered both desirable and acceptable based on the above comparative analysis.

19. **ABSENCE OF SIGNIFICANT NEW INFORMATION.**

Section 15088.5 of Title 14 of the California Code of Regulations requires a lead agency to recirculate an EIR for further review and comment when significant new information is added to the EIR after public notice is given of the availability of the draft EIR but before certification. New information includes: (i) changes to the project; (ii) changes in the environmental setting; or (iii) additional data or other information. Section 15088.5 further provides that "[n]ew information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the
project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement."

The Final EIR incorporated a number of changes and revisions to the Project. However, as indicated in the Final EIR, these changes and revisions do not result in any new significant environmental impacts or a substantial increase in the severity of an environmental impact, which cannot be mitigated. In addition, all feasible mitigation measures are included in the Mitigation Monitoring and Reporting Program, which is hereby adopted and incorporated into the Project. Therefore, having reviewed the information in the Draft and Final EIRs, the administrative record, the section 15088.5 requirements, and applicable judicial authority, the City hereby finds that no new significant information as defined within the meaning of CEQA, was added to the Final EIR following public review; and, thus, recirculation of the EIR is not required by CEQA.

Section 21081.6(a)(2) of the Public Resources Code, and section 15091(e) of Title 14 of the California Code of Regulations, require that the public agency shall specify the location of the custodian of the documents or other materials that constitute the record upon which the decision is based. Accordingly, the record and custodian of documents is The City of Glendale, 633 East Broadway, Room 201, Glendale, California 91206.

Adopted this ____ day of ________________, 2013.

______________________________
Mayor

ATTEST:

______________________________
City Clerk
STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

I, ARDASHES KASSAKHIAN, City Clerk to the City of Glendale, certify that the foregoing Resolution was adopted by the City Council of the City of Glendale, California, at a regular meeting held on the ____ day of ______________, 2013, and that same was adopted by the following vote:

Ayes:
Nees:
Absent:
Abstain:

______________________________
City Clerk
ATTACHMENT "A"

STATEMENT OF OVERRIDING CONSIDERATIONS

The Final Environmental Impact Report ("Final EIR") for the Glendale Link ("Project") has identified significant and unavoidable impacts that will result from implementation of the Project. These significant and unavoidable impacts will occur in the following environmental impact categories:

- Project-specific noise and vibration impacts
- Project-specific and cumulative recreation impacts
- Cumulative solid waste impacts

These impacts are identified in the findings adopted by the City of Glendale pursuant to section 15091 of Title 14 of the California Code of Regulations.

The California Environmental Quality Act ("CEQA"), set forth at Public Resources Code section 21000 et seq., requires that the decision making body balance the economic, legal, social, technological or other benefits of a project against its unavoidable environmental risks when determining whether to approve the project. (See also Cal. Code Regs., Title 14, §15093.) If the benefits of the project outweigh the unavoidable adverse effects, those effects may be considered acceptable. CEQA requires the agency to provide written findings supporting the specific reasons for considering a project acceptable when significant impacts are unavoidable. Such reasons must be based on substantial evidence in the Final EIR or elsewhere in the administrative record. Those reasons are provided in this Statement of Overriding Considerations.

The City finds that the economic, social, planning, and other benefits of the Project outweigh the significant and unavoidable impacts identified in the Final EIR and in the administrative record. In making this finding, the City has balanced the benefits of the Project against its unavoidable impacts and has indicated its willingness to accept those adverse impacts. The City further finds that each one of the following benefits of the Project, independent of the other benefits, warrant approval of the Project notwithstanding the unavoidable impacts of the Project:

1. The Project will provide a number of fiscal benefits to the City of Glendale, including the direct benefits of increased sales and real property taxes and indirect benefits from an increase in employment opportunities. These fiscal benefits include, but are not limited to:
The Project will increase the property tax base of the properties that compose the Project site, and result in the creation of additional sales tax revenues, in light of the Project's retail, commercial, and residential uses;

The Project will contribute a park and recreation fee to be utilized by the City for increased open and public space amenities; and

The Project is projected to generate approximately 29 full time employment opportunities and approximately 80 temporary jobs during construction.

2. The Project will update and improve the aesthetic and visual character of this area in furtherance of the objectives articulated in the Redevelopment Plan for the San Fernando Road Corridor Redevelopment Area, as implemented by the City.

3. The Project will help revitalize the San Fernando Road Corridor by adding 398 new residents and 16,500 square feet of new commercial space to the area.

4. The Project will provide additional benefits to the citizens of the City, by encouraging new private sector investment in the area through the growth of retail, dining and entertainment options.

5. The Project will contribute 142 multi-family residential units to the City in close proximity to employment opportunities, public transportation, public facilities and goods and services. Of those new units, 12 would be provided for very-low income households.

The City hereby finds that each of the reasons stated above constitutes a separate and independent basis of justification for the Statement of Overriding Considerations, and each is able to independently support the Statement of Overriding Considerations and override the unavoidable environmental effects of the Project. In addition, each reason is independently supported by substantial evidence contained in the administrative record.
ATTACHMENT "B"

MITIGATION, MONITORING AND REPORTING PROGRAM
### Mitigation Monitoring and Reporting Program Matrix

<table>
<thead>
<tr>
<th>Impact - Cultural Resources</th>
<th>Mitigation Measure</th>
<th>Mitigation Monitoring Timing</th>
<th>Responsible Monitoring Entity</th>
<th>Mitigation Measure Complete?</th>
<th>Effectiveness</th>
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<tr>
<td>4.3-1</td>
<td>In the event that archaeological resources are unearthed during project subsurface activities, all earth-disturbing work within a 200-meter (656-foot) radius shall be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. The appropriate mitigation measures may include recording the resource with the California Archaeological Inventory database or excavation, recordation, and preservation of the sites that have outstanding cultural or historic significance.</td>
<td>During ground-disturbing construction activities</td>
<td>Community Development Department</td>
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<td>4.3-2</td>
<td>In the event that paleontological resources are unearthed during project subsurface activities, all earth-disturbing work within 100-meter (328-foot) radius shall be temporarily suspended or redirected until a paleontologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. The appropriate mitigation measures may include recording the resource with the California Inventory database or excavation, recordation, and preservation of the sites that have outstanding paleontological significance.</td>
<td>During ground-disturbing construction activities</td>
<td>Community Development Department</td>
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<td>4.3-3</td>
<td>If human remains are unearthed, California Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will then contact the most likely descendant of the deceased Native American, who will then serve as consultant on how to proceed with the remains (i.e., avoid, rebury).</td>
<td>During ground-disturbing construction activities</td>
<td>Community Development Department</td>
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### Impact - Geology and Soils

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<tr>
<th>Impact - Geology and Soils</th>
<th>Mitigation Measure</th>
<th>Mitigation Monitoring Timing</th>
<th>Responsible Monitoring Entity</th>
<th>Mitigation Measure Complete?</th>
<th>Effectiveness</th>
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<tr>
<td>4.4-1</td>
<td>Geotechnical recommendations 7.1 through 7.11 contained in Section 7.0, Recommendations, of the Geotechnical Investigation Report prepared for the proposed project by Garcrest Engineering and Construction, Inc., dated May 2013, shall be implemented during project construction.</td>
<td>Prior to issuance of grading permit</td>
<td>Department of Building and Safety</td>
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<tr>
<td>Mitigation Measure</td>
<td>Mitigation Monitoring Timing</td>
<td>Responsible Monitoring Entity</td>
<td>Mitigation Measure Complete?</td>
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<td><strong>Impact - Noise</strong></td>
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<tr>
<td>4.7-1 The applicant shall provide notification to adjacent residences at least 10 days in advance of construction activities that are anticipated to result in vibration levels above the thresholds.</td>
<td>Prior to construction</td>
<td>Community Development Department</td>
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<td>4.7-2 Prior to issuance of a demolition permit, the applicant shall submit a construction plan to the City for review and approval. The construction plan shall include phases of construction, anticipated equipment, and timetables for each phase/equipment type. The following features shall be included in the construction plan:</td>
<td>Prior to issuance of grading permit</td>
<td>Community Development Department, Public Works Department</td>
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<td>• Demolition, earthmoving, and ground-impacting operations shall be conducted so as not to occur in the same period.</td>
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<td>• Demolition methods shall minimize vibration, where possible (e.g., sawing masonry into sections rather than demolishing it by pavement breakers).</td>
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<td>• Earthmoving equipment on the construction site shall be operated as far away from vibration sensitive sites as possible.</td>
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<td>4.7-3 All construction activity within the City of Glendale shall be conducted in accordance with Section 8.36.080 of the City of Glendale Municipal Code.</td>
<td>During ground-disturbing construction activities</td>
<td>Community Development Department</td>
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</table>
The project applicant shall require through contract specifications that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels:

- Two weeks prior to the commencement of construction, notification must be provided to surrounding land uses within 1,000 feet of a project site disclosing the construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period;
- Ensure that construction equipment is properly muffled according to industry standards and be in good working condition;
- Place noise-generating construction equipment and locate construction staging areas away from sensitive uses, where feasible;
- Schedule high noise-producing activities between the hours of 8:00 AM and 5:00 PM to minimize disruption on sensitive uses;
- Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, temporary noise barriers or noise blankets around stationary construction noise sources;
- Use electric air compressors and similar power tools rather than diesel equipment, where feasible;
- Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 30 minutes; and
- Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow for surrounding owners and residents to contact the job superintendent. If the City of Glendale or the job superintendent receives a complaint, the superintendent shall investigate, take appropriate corrective action, and report the action taken to the reporting party. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City of Glendale prior to issuance of a grading permit.

<table>
<thead>
<tr>
<th>Impact – Noise (continued)</th>
<th>Mitigation Measure</th>
<th>Mitigation Monitoring Timing</th>
<th>Responsible Monitoring Entity</th>
<th>Mitigation Measure Complete?</th>
<th>Effectiveness</th>
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<tbody>
<tr>
<td>4.7-4</td>
<td>The project applicant shall require through contract specifications that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels:</td>
<td>Prior to issuance of grading permit</td>
<td>Community Development Department, Public Works Department</td>
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Impact – Noise (continued)

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<th>Mitigation Measure</th>
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<tbody>
<tr>
<td>4.7-5 The project applicant shall require through contract specifications that construction staging areas along with the operation of earthmoving equipment within the project area be located as far away from vibration- and noise-sensitive sites as possible. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City of Glendale prior to issuance of a grading permit.</td>
<td>Prior to issuance of grading permit</td>
<td>Community Development Department, Public Works Department</td>
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<tr>
<td>4.7-6 The project applicant shall require through contract specifications that heavily loaded trucks used during construction would be routed away from residential streets to the extent feasible. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City of Glendale prior to issuance of a grading permit.</td>
<td>Prior to issuance of grading permit</td>
<td>Community Development Department, Public Works Department</td>
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Impact – Fire Protection and Emergency Medical Services

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<tr>
<th>Mitigation Measure</th>
<th>Mitigation Timing</th>
<th>Responsible Monitoring Entity</th>
<th>Mitigation Measure Complete?</th>
<th>Effectiveness</th>
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</thead>
<tbody>
<tr>
<td>4.8.1-1 The City of Glendale shall monitor the number of calls for emergency medical service responded to by the City’s rescue ambulance for increases in demand, and based on a request by the Glendale Fire Department, subject to any required authorization, add an additional rescue ambulance and personnel.</td>
<td>Ongoing</td>
<td>Glendale Fire Department</td>
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Impact – Police Protection

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<th>Mitigation Measure</th>
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<th>Responsible Monitoring Entity</th>
<th>Mitigation Measure Complete?</th>
<th>Effectiveness</th>
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</thead>
<tbody>
<tr>
<td>4.8.2-1 The Glendale Police Department shall monitor the number of calls for service received on an annual basis and request additional City of Glendale general funds to add additional required police personnel and/or equipment as needed to provide adequate service.</td>
<td>Ongoing</td>
<td>Glendale Police Department</td>
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Impact – Recreation

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<th>Mitigation Measure</th>
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<th>Mitigation Measure Complete?</th>
<th>Effectiveness</th>
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<tbody>
<tr>
<td>4.8.3-1 In accordance with the requirements of the City of Glendale Municipal Code (Ordinance No. 5575 and Resolution Nos. 07-164, 10-199, 11-93, 12-86, 13-102), the project applicant shall pay the Development Impact Fee to the City. The current fee schedule is $7,000 per unit for residential uses and $2.67 per square foot of commercial uses.</td>
<td>Prior to tentative tract map approval</td>
<td>Community Development Department, Community Services</td>
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</table>
Mitigation Measure | Mitigation Monitoring Timing | Responsible Monitoring Entity | Mitigation Measure Complete? | Effectiveness
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**Impact - Utilities and Service Systems - Sewer**

4.10.2-1 The project applicant shall pay a sewer impact fee for improvements and upgrades to the sewer system. These collected fees will be deposited by the City of Glendale into a specially created account to be used to fund capacity improvements.

| Prior to tentative tract map approval | Community Development Department, Public Works Department |

4.10.2-2 Each project shall contribute sewer capacity increase fees for improvements and upgrades to alleviate sewer impacts within the City. Fees would be determined based on the City’s sewer capacity increase fee methodology. These collected fees would be deposited into a specially created account to be used to fund capacity improvements of the Citywide drainage system.

| Ongoing (prior to applicable project approval) | Community Development Department, Public Works Department |
MOTION

Moved by Council Member _______________________, seconded by Council Member
____________________, that the Stage II final design submittal for the proposed five-story,
mixed-use commercial/residential building consisting of 142 residential dwelling units over
approximately 16,200 square feet of commercial space to be located 3901-3915 San Fernando
Road (the "Glendale Link" or "Project") be, and the same is hereby approved as outlined in the
staff report from the Director of Community Development dated December 10, 2013, including
comments and recommendations from the City's Urban Designer incorporated therein, and
subject any Council comments and/or conditions thereon.

Vote as follows:

Ayes:
Noes:
Absent:
Abstain:

APPROVED AS TO FORM

CHIEF ASSISTANT CITY ATTORNEY
DATED 1/1/13
MOTION

Moved by Council Member__________, seconded by Council Member__________, that the Sign Program for a five-story, mixed-use commercial/residential building consisting of 142 residential dwelling units over approximately 16,200 square feet of commercial space to be located 3901-3915 San Fernando Road (the "Glendale Link" or "Project") be, and is hereby approved as outlined in the staff report from the Director of Community Development, dated December 10, 2013, including comments and recommendations from the City’s Urban Designer incorporated herein, and subject to any Council comments and/or condition thereon.

Approval of the Sign Program shall be subject to the following conditions:

1. That the Sign Program for the Project shall be in substantial accord with the plans submitted with the application and presented to the City Council at the public hearing except for any modifications as may be required to meet specific Code standards or other conditions stipulated herein to the satisfaction of the Director of Community Development.

2. That all necessary permits, including individual sign permit and encroachment permits, shall be obtained from the City and all construction shall be in compliance with the Glendale Building code and all other applicable regulations.

3. That access to the premises shall be made available to all City of Glendale Community Development Department, Neighborhood Services Division, Police Department, and Fire Department staff upon request for the purpose of verifying compliance with all laws and the conditions of this approval.

4. The approval of the Sign Program shall be valid for a period of three years from the date of City Council approval. The entitlements may be renewed for up to two additional years upon request and approval by the Director of Community Development.

5. Any modifications to the approved Sign Program, including but not limited to sign types, sign locations, and sign details/materials/lighting not specifically identified in the submitted sign packet and/or sign program shall be reviewed and approved by the City’s Urban Designer.

Vote as follows:

Ayes:__________

Noes:__________

Absent:__________

Abstain:__________
MOTION

Moved by Council Member __________, seconded by Council Member __________, that after having reviewed the December 10, 2013, staff report from the Director of Community Development concerning a request for a conditional use permit to allow construction a five-story, mixed-use commercial/residential building consisting of 142 residential dwelling units over approximately 16,200 square feet of commercial space to be located 3901-3915 San Fernando Road (the “Glendale Link” or “Project”) in the IMU-R (Industrial/Commercial-Residential Mixed Use) Zone (Chapter 30.14, Table 30-14-A), the Council hereby grants the conditional use permit based upon the following findings and conditions made pursuant to Chapter 30.42.030 of the Glendale Municipal Code.

A. Will the proposed use be consistent with the various elements and objectives of the General Plan?

The Land Use designation of the subject site is Mixed Use. The proposed Project is a mixed-use commercial/residential project located in the IMU-R (Industrial/Commercial-Residential Mixed Use) Zone. This zone permits a variety of land uses including institutional, industrial/manufacturing/processing, multi-family residential (with a CUP), retail/commercial, service-related, and office uses. The proposed uses are consistent with the Land Use Element of the General Plan.

The Project EIR addressed consistency with all the General Plan elements and determined that the Project was consistent with the City’s General Plan and would not create any significant impacts in terms of General Plan consistency. Further, because of the project’s strategic location near the Glendale Transportation Center, the proposed mixed-use project also meets the City’s goal of creating transit-oriented development.

B. Will the proposed use and its associate structures and facilities not be detrimental to the public health, safety, or general welfare, or to the environment?

The proposed Project contains a mix of retail/commercial uses and multi-family residential dwelling units which are permitted within the IMU-R zoning district, are similar to other businesses in the surrounding area, and are consistent with the General Plan.

The Project EIR identified and discussed potential project-specific and cumulative environmental impacts that may occur due to the construction and operation of the Project. The EIR analysis specifically concerns impacts on public health, safety, or the environment. The EIR identified short-term significant impacts due to construction noise/vibration. The EIR also identified significant impacts to City recreation facilities that can only be partially mitigated.
through payment of development impact fees. The EIR also identified long-term significant impacts on solid waste disposal infrastructure which can be mitigated through payment of a fee.

Based on the environmental analysis, the Project will not be detrimental to public health, safety, or general welfare, or to the environment.

C. Will the proposed use and facilities not adversely affect or conflict with adjacent uses or impede the normal development of surrounding property?

The proposed Project is a 5-story mixed-use development consisting of retail/commercial uses on the ground floor and residential dwelling units on floors 2-5. This mix of uses is similar to the existing condition which currently consists of retail, office, and residential units in an existing two-story building.

The proposed mixed-use retail/commercial uses are permitted in the IMU-R zone and are consistent with other uses in the area. Some of the surrounding uses include various retail/service establishments, general and medical offices, a hospital, a veterinarian clinic, restaurants, and industrial/manufacturing type businesses, as well as single-family homes, multi-family residential buildings, such as the Glendale Triangle project (under construction), and a SRO (single-room occupancy) hotel.

While the Project will be somewhat larger than other developments in the area, it is not larger than the nearby mixed-use Glendale Triangle Project or the Glendale Memorial Hospital. The Project is not proposing to add any uses that do not already exist in this zoning district or in the vicinity such that the Project will be consistent with and will complement the existing businesses.

Development of the Project will not prevent or impede development or improvements to adjoining or nearby properties.

D. Explain how adequate public and private facilities such as utilities, landscaping, parking spaces and traffic circulation measures are or will be provided for the proposed use.

The Project is located in a built-out and densely populated part of southern Glendale. The site is currently served by improved streets as well as public and private utilities, including sewer.

The Project will provide a total of 244 parking spaces for all uses which exceeds the 219 spaces required by the Code by 25 spaces. The Project developer is restricting occupancy of 11% of the residential units to very-low income households. Pursuant to SB 1818, the City is required to grant a 35% density bonus (37 units), and cannot require the developer to provide more than one space per dwelling unit for studio and one-bedroom units and two spaces for two
bedroom units. In this case guest parking spaces will not be provided since that would exceed the per-unit parking count. Nonetheless, since Project parking exceeds the minimum requirements and the overall parking for this Project is considered adequate.

Traffic circulation was reviewed by the City’s Traffic and Transportation Division to ensure compliance with traffic-related measures for the project area. Access to loading and the on-grade retail parking will be provided off of San Fernando Road. Two more access points to the subterranean garage are provided from the public alley at the rear of the building.

For applications for new multi-family residential uses proposed to be located within the IMU-R zone, the following four questions must be answered.

1. How does the proposed multi-family development comply with all other applicable provisions and performance standards identified in the City of Glendale Zoning Ordinance and Municipal Code?

   The proposed mixed-use project will consist of retail and commercial uses on the ground floor and 142 residential dwelling units on the upper floors. These uses are permitted in the IMU-R zoning district and are consistent with existing uses in the surrounding area. Additionally, all new uses will be reviewed for compliance with the Zoning Code and the general provisions of the performance standards.

   As for the other performance standards related to air quality, including visible emissions, dust, odors, as well as waste and contaminants, vibration, and noise, the proposed Project would not result in any significant, long-term impacts relating to the aforementioned areas as determined by the Project EIR. However, there will be short term noise and vibration impacts in the initial construction phase due to excavation and pile driving for the podium level and subterranean parking garage. The noise and vibration generated from these construction activities are temporary and will subside upon completion of that phase.

   Overall, land uses that are permitted within the IMU-R zoning districts are low intensity and do not rise to the level that would violate the specified performance standards.

2. Will the proposed multi-family housing development result in the displacement of existing, or limit future employment on the subject site or on surrounding sites?

   The proposed mixed-use project will provide 142 new multi-family residential units. There is currently one residential unit on the second floor of the 2-story building; other uses in the existing buildings are retail or service-related. The
existing tenants will be displaced, but could return upon the completion of the new residential units.

The Project will provide approximately 16,200 square feet of combined, retail/office/studio space on the ground floor. The retail component is intended to provide a range of goods and services to the residents of the new building and surrounding area. These uses will also complement and add to the existing mix of businesses.

The proposed retail/commercial/office space will create new employment opportunities in the area. While the retail tenants have not been identified, depending on the mix of businesses, the project may have the potential to create more employment opportunities than the existing roster of businesses located on site.

The Project has the potential to encourage similar developments to the neighborhood, driving up the demand for goods and services and resulting in more employment opportunities.

3. How is the subject site physically suitable for the type and density/intensity of the proposed multi-family housing development?

The rectangular-shaped site has a flat topography and is presently developed with one- and two-story commercial buildings. The site is approximately 1.05-acres and will combine four adjoining lots. The proposed 142 dwelling units is the maximum density level permitted by the Zoning Code in conjunction with provisions of SB1818.

The proposed density is achieved through thoughtful design as well as the natural features of the lot, which make the subject site less challenging to develop.

4. Will the proposed multi-family housing development be compatible with the surrounding existing and future land uses allowed in the IMU-R zoning district?

The intent of the zoning designation of the IMU-R zone is to encourage larger scale development that will provide a range of goods and services to neighborhoods located along portions of the industrial/commercial thoroughfares. The proposed Project is consistent with that objective as it will provide a mix of different retail/commercial uses on the ground floor along with multi-family residential dwellings on the upper floors. These uses already exist in the neighborhood. The proposed uses, existing uses, and future land uses will continue to be compatible since they must comply with the underlying zoning requirements.
The Project will provide the momentum and encourage other projects like it to be developed in the area. Over time and through the zoning regulations of the area, it is anticipated that this area of south Glendale will provide an attractive, vibrant, and varied housing options that is matched with an equally vibrant business community. The area's proximity to the Glendale Transportation Center also gives this neighborhood an added benefit for transit-oriented development.

Approval of the Conditional Use Permit shall be subject to the following conditions:

1. That the project shall be built in substantial accord with the plans submitted with the application and presented at the hearing except for any modifications as may be required to meet specific Code standards or other conditions stipulated herein to the satisfaction of the Director of Community Development.

2. That access to the premises shall be made available to all City of Glendale Community Development Department, Neighborhood Services Division, Police Department, and Fire Department staff upon request for the purpose of verifying compliance with all laws and the conditions of this approval.

3. That the applicant receive City approval of a Density Bonus Housing Agreement and Housing Plan prior to the issuance of any building permits.

4. Prior to the issuance of building permits, the applicant shall submit a traffic control plan, including haul route(s) and a street conditioning and reconditioning plan, to be reviewed and approved by the Director of Public Works.

5. Construction-related activity shall be limited to the days and hours permitted by the Glendale Municipal Code.

Vote as follows:

Ayes:

Noes:

Abstain:

Absent:
GLENDALE LINK PROJECT

Final
Environmental Impact Report

Prepared for:
City of Glendale
633 East Broadway, Room 103
Glendale, California 91206

Prepared by:
Impact Sciences, Inc.
638 East Colorado Boulevard
Suite 301
Pasadena, California 91101

November 2013
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1.0 SUMMARY

CEQA REQUIREMENTS

In accordance with the California Environmental Quality Act (CEQA), specifically State CEQA Guidelines Sections 15088, 15089, and 15132, the City of Glendale has prepared the Final Environmental Impact Report (EIR) for the proposed Glendale Link Project. A Final EIR is defined by Section 15362(b) of the State CEQA Guidelines as “containing the information contained in the Draft EIR; comments, either in verbatim or in summary received in the review process; a list of persons commenting; and the responses of the Lead Agency to the comments received.”

Section 3.0 of this document contains all comments received on the Draft EIR during the document’s 30-day public review period of September 12, 2013 to October 14, 2013. Responses to comments received by all interested parties have been prepared and are included in this document. Section 2.0, Corrections and Additions, includes changes to the Draft EIR, either in response to comments received on the document or as initiated by the Lead Agency (City of Glendale).

This document, along with the Draft EIR (incorporated by reference), make up the Final EIR as defined in State CEQA Guidelines, Section 15132, which states that:

The Final EIR shall consist of:

(a) The Draft EIR or a revision of the Draft.

(b) Comments and recommendations received on the Draft EIR either verbatim or in summary.

(c) A list of persons, organizations, and public agencies comment on the Draft EIR.

(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.

(e) Any other information added by the Lead Agency.

USES OF THE FINAL EIR

The Final EIR allows the public and the decision makers an opportunity to review revisions to the Draft EIR, the response to comments, and other components of the EIR, such as the Mitigation Monitoring Program, prior to approval of the project. The Final EIR serves as the environmental document to support approval of the proposed project, either in whole or in part.
After completing the Final EIR, and before approving the project, the Lead Agency must make the following three certifications as required by Section 15090 of the State CEQA Guidelines:

- That the Final EIR has been completed in compliance with CEQA;
- That the Final EIR was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information in the Final EIR prior to approving the project; and
- That the Final EIR reflects the Lead Agency’s independent judgment and analysis.

Additionally, pursuant to Section 15093(b) of the State CEQA Guidelines, when a Lead Agency approves a project that would result in significant unavoidable impacts that are disclosed in the Final EIR, the agency must state its reasons for supporting the approved action in writing. This Statement of Overriding Considerations is supported by substantial information in the record, which includes the Final EIR. Since the proposed project would result in significant unavoidable impacts, the decision-making body (City Council) would be required to adopt a Statement of Overriding Considerations if it approves the proposed project.

These certifications, along with the Facts, Findings, and the Statement of Overriding Considerations will be included in a separate document. Both the Final EIR and the Findings are submitted to the decision-making body for consideration of the proposed project.

**REVISIONS TO THE DRAFT EIR**

Text changes are intended to clarify or correct information in the Draft EIR in response to comments received on the document or as initiated by Lead Agency (City) staff. Text changes are included in this Final EIR in Section 2.0 Corrections and Additions.

**PROJECT LOCATION AND SETTING**

The project site is located at 3901 and 3915 San Fernando Road in the southern portion of the City of Glendale; approximately 1,200 feet east of the boundary between the Cities of Glendale and Los Angeles. SR-134 and SR-2 (the Ventura and Glendale Freeways) and Interstate 5 (the Golden State Freeway) provide regional access to the project site. The project site is located within the San Fernando Road Corridor Redevelopment Project Area, and is bound by San Fernando Road to the east, an existing CVS and associated parking lot to the north, Central Avenue to the south and a public alley to the west. The project site is located near the southern border of Glendale and therefore acts as a gateway to the City.
PROJECT CHARACTERISTICS

The proposed project includes 142 multi-family residential units; approximately 11,600 square feet of commercial floor area, 5,000 square feet of commercial studio space, 1,500 square feet of lobby/leasing area, supporting parking facilities, and recreation and open space amenities. The project as proposed consists of one U-shaped five-story structure that wraps around the site on the sides facing San Fernando Road, Central Avenue, and the CVS Pharmacy parking lot. The ground floor would include commercial uses with residential uses occupying the four levels above. The recreational facilities and open space amenities would be located on the second floor, podium level, and would total 13,853 square feet (including indoor amenities). The building would also include a lobby, a bike shop, storage rooms, service, trash and recycling rooms, an outdoor pool area, and courtyards. A total of 244 parking spaces would be provided on the ground floor and within a two-level subterranean parking garage. The primary entrance for the retail and studio space and the residential building front the streets at the ground floor. Additional entrance/exits would be provided from the alley.

OBJECTIVES OF THE PROJECT

The following are the City project objectives for the Glendale Link project.

- Create a diversity of residential and urban uses to activate and strengthen the vitality of southern Glendale
- Provide housing opportunities, pursuant to the City of Glendale's policy, in an urban setting in close proximity to employment opportunities, public transportation, public facilities, and goods and services
- Provide affordable housing opportunities in the City of Glendale
- Utilize architectural design, lighting, and landscape design within the residential component to complement and enhance the architectural character of the proposed building while also fitting into the existing fabric of the area and give the project site a distinctive and pleasing appearance
- Increase demand for local retail services
- Provide employment opportunities for City residents
- Develop a Transit Oriented Development, thereby reducing the number of vehicles, creating localized employment, revitalizing the local neighborhood, and providing a dynamic living environment

SIGNIFICANT IMPACTS

The Draft EIR identified the following significant impacts:
1.0 Summary

- Noise – construction noise was determined to be significant and unavoidable
- Recreation – impacts related to recreation were determined to be significant and unavoidable
- Solid Waste – cumulative solid waste impacts were determined to be significant and unavoidable

ALTERNATIVES TO THE PROJECT

CEQA requires that an environmental impact report (EIR) describe a range of reasonable alternatives to a proposed project that could feasibly avoid or lessen any significant environmental impacts, while attaining the basic objectives of the project. Comparative analysis of the impacts of these alternatives is required. In response to the significant impacts associated with the proposed project, the City of Pasadena developed and considered several alternatives to the project. These alternatives include:

- **Alternative 1 – No Project/No Development Alternative**
  
  Under the No Project/No Development Alternative, the project site would not be developed with additional uses, and would remain in its current state. Existing retail, industrial/commercial uses, including parking, would remain. This alternative assumes no further development occurs within the project site.

- **Alternative 2 – Reduced Density/Reuse of 3901 San Fernando Road**
  
  Under this alternative the entire building at 3901 San Fernando Road would be retained. Alternative 2 would maintain the existing one- and two-story commercial building at the San Fernando Road and Central Avenue corner, and the building’s rooftop commercial advertising billboard. Parking for that building’s studio/industrial, retail, and office space would be provided within the adjacent new building. The building on the remainder of the site would be demolished and removed. Occupying the remaining 0.78-acre mid-block portion of the site, the new building would provide 6,400 square feet of new retail space fronting San Fernando Road at the ground level, and 88 apartments in four stories above. There would be 56 one-bedroom and 32 two-bedroom apartments ranging from 600 to 972 square feet. Under this alternative 4 affordable units would be provided. Commercial parking for the new building as well as for the retained 3901 San Fernando Road building would be provided at the ground level, as well as in a two-level subterranean garage. The remainder of the two-level subterranean garage would be for resident parking.

- **Alternative 3 – Industrial Only Alternative**
  
  The Industrial Alternative considers development of the entire site with only industrial uses. This alternative was formulated to reduce the significant noise and recreation impacts of the proposed project by reducing the amount of development and population generated. Under this alternative, all on-site buildings would be demolished and removed. The layout for the land uses would result in the development of approximately 40,000 square feet of industrial space in a single story with surface parking. No subterranean parking would be included. By reducing the amount of development, the construction duration for this alternative would also be reduced. In addition, the absence of a
residential component associated with this alternative would reduce the demand for parks and recreational facilities.

The *State CEQA Guidelines* require that an environmentally superior alternative be identified from the alternatives considered in an EIR. The analysis contained in Section 7.0, Alternatives, of the Draft EIR concluded that the No Project/No Development Alternative would avoid the significant impacts identified for the proposed project and would be environmentally superior. While all significant impacts associated with the proposed project would be avoided under the No Project/No Development alternative, very few of the project objectives would be attained because the site would not be redeveloped. According to CEQA if the No Project/No Development Alternative is identified as the environmentally superior alternative, “the EIR shall also identify an environmentally superior alternative among the other alternatives.”

Of the other alternatives considered, the Industrial Only Alternative would avoid significant recreation impacts, but would not achieve key project objectives related to strengthening the vitality of the surrounding area through transit oriented housing opportunities. The Reduced Density/Reuse Alternative is considered environmentally superior, as it substantially reduces construction related noise impacts and would achieve most of the project objectives, although to a lesser extent. The Reduced Density/Reuse Alternative also would not achieve the goal of providing affordable housing. Additionally, the development density and resulting revenue would not be sufficient to offset the cost of the land and would not be economically feasible for the applicant for this reason.

**Comparison of Alternatives**

The analysis contained in Section 7.0 Alternatives of the Draft EIR concluded that the No Project/No Development Alternative would avoid the significant impacts identified for the proposed project and would be environmentally superior. While all significant impacts associated with the proposed project would be avoided under the No Project/No Development Alternative, none of the project objectives would be attained because the site would not be redeveloped. According to CEQA, if the No Project/No Development Alternative is identified as the environmentally superior alternative, “the EIR shall also identify an environmentally superior alternative among the other alternatives.”

Of the other alternatives considered, the Industrial Only Alternative would avoid significant recreation impacts, but would not achieve key project objectives related to strengthening the vitality of south Glendale through creating transit oriented housing opportunities. The Reduced Density/Reuse Alternative is considered environmentally superior, as it substantially reduces construction related noise impacts and would achieve most of the project objectives, although as demonstrated in Table 7.0-1
Alternative 2 would attain the project objectives to a lesser extent than the proposed project. As described in Section 7.0 Alternatives of the Draft EIR, and in the Responses to Comments, the Reduced Density/Reuse Alternative would not be economically feasible. Appendix F02 provides economic details that demonstrate that the resulting revenue that could be attained with the Reduced Density/Reuse Alternative would not be sufficient to offset the cost of the land and Alternative 2 would not be economically feasible for this reason.

AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

Based on responses to the Notice of Preparation, the City has determined the following area is an area of controversy:

- Demolition of the 3901 San Fernando Road structure.

ISSUES TO BE RESOLVED

The State CEQA Guidelines require an EIR to present issues to be resolved by the lead agency. These issues include the choice between alternatives and whether or how to mitigate potentially significant impacts. The major issues to be resolved by the City of Glendale, as the Lead Agency for the project include the following:

- Whether the recommended mitigation measures should be adopted or modified
- Whether additional mitigation measures need to be applied to the project
- Whether the project or an alternative should be approved

SUMMARY OF PROJECT IMPACTS

A summary of the environmental impacts associated with implementation of the proposed project, mitigation measures included to avoid or lessen the severity of potentially significant impacts, and residual impacts, is provided in Table 1.0-1, Summary of Project Impacts, Mitigation Measures, and Residual Impacts, below.
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Summary Table of Project Impacts and Mitigation Measures

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<td>The project would not have a substantial adverse effect on a scenic vista.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
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<td>The project would not substantially degrade the existing visual character or quality of the site and its surroundings.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
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<td>The project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The project would not shade currently unshaded uses located off the site that are sensitive to shadow, such as residences, school playgrounds, parks, etc., for more than two continuous hours between 9:00 AM and 3:00 PM during the winter, or 9:00 AM and 5:00 PM during the summer.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
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<tr>
<td><strong>Cumulative Impacts</strong></td>
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<tr>
<td>The project and related projects would not have a substantial adverse effect on a scenic vista.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The project and related projects would not substantially degrade the existing visual character or quality of the site and its surroundings.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The project and related projects create new sources of substantial light or glare, which would adversely affect day or nighttime views in the area.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>Project Impacts</td>
<td>Level of Significance Without Mitigation</td>
<td>Mitigation Measures</td>
<td>Level of Significance With Mitigation</td>
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<tr>
<td><strong>AESTHETICS (continued)</strong></td>
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<tr>
<td><strong>Cumulative Impacts (continued)</strong></td>
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<tr>
<td>The project and related projects shade currently unshaded uses located off the site that are sensitive to shadow, such as residences, school playgrounds, parks, etc., for more than two continuous hours between 9:00 AM and 3:00 PM during the winter, or 9:00 AM and 5:00 PM during the summer.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
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<tr>
<td><strong>AIR QUALITY</strong></td>
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<tr>
<td><strong>Project Impacts</strong></td>
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<tr>
<td>The project would not conflict with or obstruct the implementation of the applicable air quality plan.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The project would not exceed SCAQMD thresholds for criteria pollutants during construction or operation.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation as a result of operational activity.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The project would not expose sensitive receptors to substantial pollutant concentrations.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The project would not create objectionable odors affecting a substantial number of people.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td><strong>Cumulative Impacts</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construction and operational emissions would not exceed the SCAQMD project-level thresholds of significance.</td>
<td>Less than significant</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
</tbody>
</table>
## 1.0 Summary

### Cultural Resources

<table>
<thead>
<tr>
<th>Project Impacts</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measures</th>
<th>Level of Significance With Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>The project would not result in the demolition of a resource of national, state, or local significance.</td>
<td>Less than significant</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.</td>
<td>Potentially significant 4.3-1</td>
<td>In the event that archaeological resources are unearthed during project subsurface activities, all earth-disturbing work within a 200-meter (656-foot) radius shall be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. The appropriate mitigation measures may include recording the resource with the California Archaeological Inventory database or excavation, recordation, and preservation of the sites that have outstanding cultural or historic significance.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.</td>
<td>Potentially significant 4.3-2</td>
<td>In the event that paleontological resources are unearthed during project subsurface activities, all earth-disturbing work within 100-meter (328-foot) radius shall be temporarily suspended or redirected until a paleontologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. The appropriate mitigation measures may include recording the resource with the California Inventory database or excavation, recordation, and preservation of the sites that have outstanding paleontological significance.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>Project Impacts (continued)</td>
<td>Level of Significance Without Mitigation</td>
<td>Mitigation Measures</td>
<td>Level of Significance With Mitigation</td>
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<tr>
<td>The proposed project would not disturb any human remains, including those interred outside of formal cemeteries.</td>
<td>Potentially significant</td>
<td>4.3-3 If human remains are unearthed, California Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will then contact the most likely descendant of the deceased Native American, who will then serve as consultant on how to proceed with the remains (i.e., avoid, rebury).</td>
<td>Less than significant</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Cumulative Impacts</th>
<th>Level of Significance</th>
<th>Mitigation Measures</th>
<th>Level of Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>The proposed project would result in the loss of a locally important resource. The nearby related projects are not historic resources and therefore would not result in a cumulative loss of historic resources.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
</tbody>
</table>
## 1.0 Summary

### GEOLOGY AND SOILS

**Project Impacts**

<table>
<thead>
<tr>
<th>Project Impacts</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measures</th>
<th>Level of Significance With Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>The proposed project would not expose people or structures to strong seismic ground shaking.</td>
<td>Less than significant</td>
<td>None are required</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The proposed project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving ground failure including liquefaction.</td>
<td>Less than significant</td>
<td>None are required</td>
<td>Less than significant</td>
</tr>
<tr>
<td>The proposed project would not 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.</td>
<td>Potentially significant</td>
<td>4.4-1 Geotechnical recommendations 7.1 through 7.11 contained in Section 7.0, Recommendations, of the Geotechnical Investigation Report prepared for the proposed project by Garcrest Engineering and Construction, Inc., dated May 2013, shall be implemented during project construction.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>The proposed project would not be located on expansive soil, as defined in Table 18-1-B of the California Building Code (2001), creating substantial risks to life and property.</td>
<td>Less than significant</td>
<td>None are required</td>
<td>Less than significant</td>
</tr>
</tbody>
</table>

**Cumulative Impacts**

| The proposed project would not contribute to a cumulatively considerable impact related to geology and soils, impacts would be less than significant. | Less than significant                   | None are required   | Less than significant               |

### GREENHOUSE GAS EMISSIONS

**Project Impacts**

<table>
<thead>
<tr>
<th>Project Impacts</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measures</th>
<th>Level of Significance With Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>The proposed project would not generate GHG emission that would exceed SCAQMD thresholds.</td>
<td>Less than significant</td>
<td>None are required</td>
<td>Less than significant</td>
</tr>
<tr>
<td>The proposed project would not conflict with applicable plans or policies related to greenhouse gas emissions.</td>
<td>Less than significant</td>
<td>None are required</td>
<td>Less than significant</td>
</tr>
</tbody>
</table>

**Cumulative Impacts**

| The projects contribution to cumulative greenhouse gas emissions would be less than significant. | Less than significant                   | None are required   | Less than significant                |
## 1.0 Summary

<table>
<thead>
<tr>
<th>Project Impacts</th>
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<tbody>
<tr>
<td><strong>LAND USE AND PLANNING</strong></td>
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</tr>
<tr>
<td>Project Impacts</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the proposed project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.</td>
<td></td>
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</tr>
<tr>
<td><strong>Cumulative Impacts</strong></td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The proposed project and related projects would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the proposed project and related projects (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.</td>
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<tr>
<td><strong>NOISE</strong></td>
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</tr>
<tr>
<td>Project Impacts</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The proposed project would not result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.</td>
<td></td>
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</tr>
<tr>
<td>The proposed project would not result in a substantial permanent increase in ambient noise levels in the project site vicinity above levels existing without the proposed project.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>Project Impacts</td>
<td>Level of Significance Without Mitigation</td>
<td>Mitigation Measures</td>
<td>Level of Significance With Mitigation</td>
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<tr>
<td><strong>NOISE (continued)</strong></td>
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<tr>
<td><strong>Project Impacts (continued)</strong></td>
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<tr>
<td>The proposed project would not result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.</td>
<td>Significant.</td>
<td>4.7-1 The applicant shall provide notification to adjacent residences at least 10 days in advance of construction activities that are anticipated to result in vibration levels above the thresholds.</td>
<td>Significant and unavoidable</td>
</tr>
<tr>
<td></td>
<td></td>
<td>4.7-2 Prior to issuance of a demolition permit, the applicant shall submit a construction plan to the City for review and approval. The construction plan shall include phases of construction, anticipated equipment, and timetables for each phase/equipment type. The following features shall be included in the construction plan:</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Demolition, earthmoving, and ground-impacting operations shall be conducted so as not to occur in the same period.</td>
<td></td>
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<tr>
<td></td>
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<td>• Demolition methods shall minimize vibration, where possible (e.g., sawing masonry into sections rather than demolishing it by pavement breakers).</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td>• Earthmoving equipment on the construction site shall be operated as far away from vibration sensitive sites as possible.</td>
<td></td>
</tr>
<tr>
<td>The proposed project would result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the proposed project.</td>
<td>Potentially significant</td>
<td>4.7-3 All construction activity within the City of Glendale shall be conducted in accordance with Section 8.36.080 of the City of Glendale Municipal Code.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>Project Impacts</td>
<td>Level of Significance Without Mitigation</td>
<td>Mitigation Measures</td>
<td>Level of Significance With Mitigation</td>
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</tr>
<tr>
<td>NOISE (continued)</td>
<td>Project Impacts (continued)</td>
<td></td>
<td>4.7-4 The project applicant shall require through contract specifications that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels:</td>
</tr>
</tbody>
</table>

- Two weeks prior to the commencement of construction, notification must be provided to surrounding land uses within 1,000 feet of a project site disclosing the construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period;
- Ensure that construction equipment is properly muffled according to industry standards and be in good working condition;
- Place noise-generating construction equipment and locate construction staging areas away from sensitive uses, where feasible;
- Schedule high noise-producing activities between the hours of 8:00 AM and 5:00 PM to minimize disruption on sensitive uses;
- Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, temporary noise barriers or noise blankets around stationary construction noise sources; |
### Project Impacts

<table>
<thead>
<tr>
<th>Project Impacts</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measures</th>
<th>Level of Significance With Mitigation</th>
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<tbody>
<tr>
<td>NOISE (continued)</td>
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</tbody>
</table>

#### Project Impacts (continued)

4.7-4 (continued)

- Use electric air compressors and similar power tools rather than diesel equipment, where feasible;
- Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 30 minutes; and
- Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow for surrounding owners and residents to contact the job superintendent. If the City of Glendale or the job superintendent receives a complaint, the superintendent shall investigate, take appropriate corrective action, and report the action taken to the reporting party. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City of Glendale prior to issuance of a grading permit.
## 1.0 Summary

<table>
<thead>
<tr>
<th>Project Impacts</th>
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<tr>
<td><strong>NOISE (continued)</strong></td>
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<tr>
<td><strong>Project Impacts (continued)</strong></td>
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<tr>
<td><strong>4.7-5</strong></td>
<td>The project applicant shall require</td>
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<td>through contract specifications that</td>
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<td></td>
<td>construction staging areas along with</td>
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<td></td>
<td>the operation of earthmoving equipment</td>
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<td>within the project area be located as</td>
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<td></td>
<td>far away from vibration- and noise-sensitive sites as possible. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City of Glendale prior to issuance of a grading permit.</td>
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<tr>
<td><strong>4.7-6</strong></td>
<td>The project applicant shall require</td>
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<td>through contract specifications that</td>
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<td>heavily loaded trucks used during</td>
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<td>construction would be routed away from</td>
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<td>residential streets to the extent feasible.</td>
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<tr>
<td></td>
<td>Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City of Glendale prior to issuance of a grading permit.</td>
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<tr>
<td><strong>Cumulative Impacts</strong></td>
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</tr>
<tr>
<td>The proposed project and related projects would not result in the exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The proposed project and related projects would not result in a substantial permanent increase in ambient noise levels in the project site vicinity above levels existing without the proposed project.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The proposed project and related projects would not result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
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</table>
### Project Impacts | Level of Significance Without Mitigation | Mitigation Measures | Level of Significance With Mitigation
---|---|---|---
**NOISE (continued)**<br>Cumulative Impacts (continued)<br>The proposed project and related projects would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the proposed project.<br>Less than significant. | None are required. | Less than significant.<br><br>**PUBLIC SERVICES – FIRE PROTECTION AND EMERGENCY MEDICAL SERVICES**<br>Project Impacts<br>The project would not 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 fire protection services.<br>Less than significant. | None are required | Less than significant.<br>Cumulative Impacts<br>The proposed project and related projects could 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 fire protection services.<br>Potentially significant (emergency medical services). | 4.8.1-1 The City of Glendale shall monitor the number of calls for emergency medical service responded to by the City’s rescue ambulance for increases in demand, and based on a request by the Glendale Fire Department, subject to any required authorization, add an additional rescue ambulance and personnel. | Less than significant.<br><br>**PUBLIC SERVICES – POLICE PROTECTION**<br>Project Impacts<br>The proposed project would not result in substantial adverse 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 police protection.<br>Less than significant. | None are required | Less than significant.
### 1.0 Summary

<table>
<thead>
<tr>
<th>Project Impacts</th>
<th>Level of Significance Without Mitigation</th>
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<th>Level of Significance With Mitigation</th>
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<tbody>
<tr>
<td><strong>PUBLIC SERVICES – POLICE PROTECTION (continued)</strong></td>
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<tr>
<td><strong>Cumulative Impacts</strong></td>
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<td></td>
</tr>
<tr>
<td>The proposed project and related projects could result in a substantial adverse impact 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 police protection.</td>
<td>Potentially significant</td>
<td>4.8.2-1 The Glendale Police Department shall monitor the number of calls for service received on an annual basis and request additional City of Glendale general funds to add additional required police personnel and/or equipment as needed to provide adequate service.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td><strong>RECREATION</strong></td>
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<tr>
<td><strong>Project Impacts</strong></td>
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</tr>
<tr>
<td>The project would 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.</td>
<td>Potentially significant</td>
<td>4.8.3-1 In accordance with the requirements of the City of Glendale Municipal Code (Ordinance No. 5575 and Resolution Nos. 07-164, 10-199, 11-93, 12-86, 13-102), the project applicant shall pay the Development Impact Fee to the City. The current fee schedule is $7,000 per unit for residential uses and $2.67 per square foot of commercial uses.</td>
<td>Significant and unavoidable</td>
</tr>
<tr>
<td>The project would not include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td><strong>Cumulative Impacts</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The project and related projects would 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. The project’s contribution would be cumulatively considerable.</td>
<td>Potentially significant</td>
<td>See mitigation measure 4.8.3-1</td>
<td>Significant and unavoidable.</td>
</tr>
<tr>
<td>The project and related projects would not include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
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</table>
## Project Impacts

### TRAFFIC

<table>
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<tr>
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<th>Level of Significance With Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>The project would not cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The project would not exceed, either individually or cumulatively, a Level of Service standard established by the County congestion management agency for designated roads or highways.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The project would not substantially increase hazards due to a design feature or incompatible uses.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The project would not result in inadequate emergency access.</td>
<td>Less than significant</td>
<td>None are required</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The project would not conflict with policies related to alternative transportation.</td>
<td>Less than significant</td>
<td>None are required</td>
<td>Less than significant.</td>
</tr>
</tbody>
</table>

### Cumulative Impacts

<table>
<thead>
<tr>
<th>Project Impacts</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measures</th>
<th>Level of Significance With Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>The project combined with related projects would not cause an increase in traffic that is substantial in relation to the existing traffic load and capacity.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The project combined with related projects would not exceed a level of service standard established by the County congestion management agency.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The project combined with related projects would not increase hazards due to a design feature.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The project combined with related projects would not result in inadequate emergency access.</td>
<td>Less than significant</td>
<td>None are required</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The project combined with related project would not conflict with policies related to alternative transportation.</td>
<td>Less than significant</td>
<td>None are required</td>
<td>Less than significant.</td>
</tr>
</tbody>
</table>
### Utilities and Service Systems – Water Service

<table>
<thead>
<tr>
<th>Project Impacts</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measures</th>
<th>Level of Significance With Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>The proposed project would have sufficient water supplies available to serve the proposed project from existing entitlements and resources, or are new or expanded entitlements needed.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
</tbody>
</table>

**Cumulative Impacts**

<table>
<thead>
<tr>
<th>Project Impacts</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measures</th>
<th>Level of Significance With Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>The proposed project and related projects would have sufficient water supplies available to serve the proposed project and related projects from existing entitlements and resources, or are new or expanded entitlements needed.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
</tbody>
</table>

### Utilities and Service Systems – Sewer

<table>
<thead>
<tr>
<th>Project Impacts</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measures</th>
<th>Level of Significance With Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>The proposed project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The proposed project would not result in a determination by the wastewater treatment provider, which serves or may serve the proposed project that it has adequate capacity to serve the proposed project’s projected demand in addition to the provider’s existing commitments.</td>
<td>Significant</td>
<td>4.10.2-1 The project applicant shall pay a sewer impact fee for improvements and upgrades to the sewer system. These collected fees will be deposited by the City of Glendale into a specially created account to be used to fund capacity improvements.</td>
<td>Less than significant.</td>
</tr>
</tbody>
</table>
### 1.0 Summary

#### UTILITIES AND SERVICE SYSTEMS – SEWER (continued)

<table>
<thead>
<tr>
<th>Project Impacts</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measures</th>
<th>Level of Significance With Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cumulative Impacts</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The proposed project and related projects would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant</td>
</tr>
<tr>
<td>The proposed project and related projects would not exceed wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the proposed project and related projects’ projected demand in addition to the provider’s existing commitments.</td>
<td>Potentially significant.</td>
<td><a href="#">4.10.2-2</a> Each project shall contribute sewer capacity increase fees for improvements and upgrades to alleviate sewer impacts within the City. Fees would be determined based on the City’s sewer capacity increase fee methodology. These collected fees would be deposited into a specially created account to be used to fund capacity improvements of the Citywide drainage system.</td>
<td>Less than significant.</td>
</tr>
</tbody>
</table>

#### UTILITIES AND SERVICE SYSTEMS – SOLID WASTE

<table>
<thead>
<tr>
<th>Project Impacts</th>
<th>Level of Significance Without Mitigation</th>
<th>Mitigation Measures</th>
<th>Level of Significance With Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cumulative Impacts</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the proposed project’s solid waste disposal needs.</td>
<td>Less than significant.</td>
<td>None are required.</td>
<td>Less than significant.</td>
</tr>
<tr>
<td>The proposed project and related projects would be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs.</td>
<td>Potentially significant.</td>
<td>None feasible</td>
<td>Significant and unavoidable.</td>
</tr>
</tbody>
</table>
2.0 CORRECTIONS AND ADDITIONS

The following corrections and additions are set forth to update the Glendale Link Project Draft Environmental Impact Report (Draft EIR) in response to the comments received during and after the public review period. Changes to the Draft EIR are listed by section and page number and new text is provided in underline with strikeout of deleted text.

The following additions and corrections have been reviewed in relation to the standards in Section 15088.5(a) and (b) of the California Environmental Quality Act (CEQA) Guidelines on when recirculation of a Draft EIR is required prior to certification. The additions and corrections to the Revised Draft EIR document do not constitute new significant information requiring recirculation of the Draft EIR.

Sections 15088.5(a) and (b) of the State CEQA Guidelines state,

(a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from other previously analyzed would clearly lessen the significant environmental impacts of the project, but the project’s proponent decline to adopt it.

(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

(b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.
CORRECTIONS AND ADDITIONS

Changes to the Draft EIR are identified below by the corresponding Draft EIR section and subsection, if applicable, and the page number. Additions are in underline and deletions are shown in strikethrough format.

Executive Summary

The Executive Summary of the Draft EIR is replaced by Section 1.0, Summary, as contained in the Final EIR document.

4.3 Cultural Resources

The last sentence of the second paragraph on page 4.3-2 is revised as follows:

The northern portion of the project site is developed with a one-story industrial/commercial building and associated surface parking lot that was constructed in the 1990s.

7.0 Alternatives

The second line on page 7.0-5 is revised as follows:

Under this alternative four affordable units would be provided.

This change corrects the number of affordable units that would be provided under Alternative 2. The calculation of affordable units is based on a combination of factors including the parcel size of 0.78 acre and an allowable density of 100 units per acre. The formula used to calculate density bonuses under SB 1818 would result in a total of four affordable units under Alternative 2. This correction does not materially change the alternatives analysis as no significant impacts were identified related to the number of affordable units.

The following text and table has been added to the bottom of page 7.0-11:

Overall, as demonstrated in Table 7.0-1, Alternative 2 Relationship to the Project Objectives, Alternative 2 would achieve most of the project objectives; however, it would be to a lesser extent than the proposed project because of the reduced size of the project.
Table 7.0-1
Alternative 2 Relationship to the Project Objectives

<table>
<thead>
<tr>
<th>Objective</th>
<th>Relationship to Objective</th>
</tr>
</thead>
<tbody>
<tr>
<td>Revitalize the San Fernando Road Corridor</td>
<td>Alternative 2 would revitalize the San Fernando Corridor by constructing a combination of retail and residential uses on a portion of the project site. Under Alternative 2, the reuse building would be retained and therefore would not increase the rentable space in the building and associated opportunities for revitalization. The construction of a new building on the north parcel (at a reduced density compared to the proposed project) would create an opportunity for revitalization. However, as the building would be smaller and only a portion of the site would be redeveloped, this objective would be met, but to a lesser extent than the proposed project.</td>
</tr>
<tr>
<td>Create a diversity of residential and urban uses to activate and strengthen the vitality of southern Glendale</td>
<td>Alternative 2 would provide residential and retail uses. This alternative would provide 10,100 fewer square feet of new, rentable retail space, 54 fewer residential units, and eight fewer affordable units. The existing reuse building would be maintained in its current state and would be limited to commercial uses; it would not offer a diversity of uses. This objective would be met, but to a lesser extent than the proposed project.</td>
</tr>
<tr>
<td>Provide affordable housing opportunities in the City of Glendale</td>
<td>Alternative 2 would provide four affordable housing units compared to 12 units of affordable housing with the proposed project. Therefore, this objective would be met, but to a lesser extent that the proposed project.</td>
</tr>
<tr>
<td>Provide housing opportunities, pursuant to the City’s policy, in an urban setting in close proximity to employment opportunities, public transportation, public facilities, and goods and services</td>
<td>Under Alternative 2, housing opportunities would be limited to the new building on the north parcel. No housing would be provided in the reuse building. This alternative would provide 54 fewer residential units and eight fewer affordable units than the proposed project. Housing provided would be in an urban setting, in close proximity to employment, public transportation, public facilities, and goods and services. This objective would be met, but to a lesser extent than the proposed project.</td>
</tr>
<tr>
<td>Utilize architectural design, lighting, and landscape design within the residential component to complement and enhance the architectural character of the proposed building while also fitting into the existing fabric of the area and give the project site a distinctive and pleasing appearance</td>
<td>Under Alternative 2, architectural design elements would be limited to the newly constructed building on the north parcel. The newly constructed building would be consistent with the urban form of the area, particularly the nearby Camden/Triangle project and other high-density urban projects in the south Glendale area. The reuse building would remain in its current form. With this alternative, a new building would be constructed immediately adjacent to the reuse building. By locating a new building next to the reuse building, the reuse building could appear out of character with the other more modern buildings in the area. In addition, the reuse building would retain the existing billboard which does not enhance the overall architectural character of the area nor does it contribute to a pleasing appearance. As only a portion of the site (the north parcel) would utilize architectural design elements, this objective would be partially met.</td>
</tr>
<tr>
<td>Increase demand for local retail services</td>
<td>This alternative would provide additional retail space in the newly constructed building that would be located on the north parcel. The available rental space in the reuse building would be the same. The retail space in the reuse building is not configured to modern standards and is therefore limited in terms of use. The reuse building would not be expected to attract high-end retail services that are in demand in urban areas. The new building would provide 6,400 square feet of new retail space which would be rentable, compared to 16,500 square feet of new rentable space with the proposed project. Further, the location of the reuse building (on the corner of San Fernando Road and Central Avenue) provides the best visibility and opportunity for rentable space. The rentable space in the building that would be constructed under Alternative 2 would be located on the north parcel and would not be as visible as the corner parcel. This would result in lower rents and fewer high quality tenants in the new building compared to what could be achieved with proposed project which would utilize a highly visible/high demand location. Therefore, this objective would be met, but to a lesser extent that the proposed project.</td>
</tr>
</tbody>
</table>
Provide employment opportunities for City residents

Under Alternative 2, no new employment opportunities would be provided at the reuse building. New retail and associated employment opportunities would be provided with the newly constructed building; however, the amount of retail space and associated employment opportunities would be reduced compared to the proposed project. In addition, due to the location of the proposed new building (mid-block), the tenants would not be as high quality as could be achieved with the more prominent corner location. Lower quality tenants would result in lower quality employment opportunities for City residents. Also, as the construction period would be shorter with this alternative compared to the proposed project, fewer construction jobs would be provided. Therefore, this objective would be met, but to a lesser extent than the proposed project.

Develop a Transit Oriented Development, thereby reducing the number of vehicles, creating localized employment, revitalizing the local neighborhood and providing a dynamic living environment

Alternative 2 would be located on the same project site as the proposed project and therefore would be in close proximity to transit. However, this alternative would include 54 fewer residential units, eight fewer affordable units, and fewer square feet of retail space compared to the proposed project. Alternative 2 would not maximize on the proximity to transit as fewer residences would be included. As such, this objective would be met, but to a lesser extent than the proposed project.

As provided in Table 7.0-1, above, this Alternative would not maximize on the proximity of the project site to nearby employment, public facilities, and the transit center. The reduced size of the project would result in substantially less new rentable commercial space, 54 fewer residential units, and eight fewer affordable units.
3.0 COMMENT LETTERS AND RESPONSES

INTRODUCTION

According to the California Environmental Quality Act (CEQA) Guidelines, Section 15132, the Final EIR shall consist of the following items: (1) the Draft EIR or a revision of the Draft, (2) comments and recommendations received on the Draft EIR, (3) a list of persons, organizations and public agencies commenting on the Draft EIR, (4) the responses of the Lead Agency to significant environmental points raised in the review and consultation process, and (5) any other information added by the lead agency. Item 1 is provided as Section 2.0, Corrections and Additions to the Draft EIR, of this document.

The Draft EIR was submitted to the State Clearinghouse Office of Planning and Research and circulated for public review on September 12, 2013. The 30-day comment period concluded on October 14, 2013. Comment letters received after this date were also accepted and are included in this Final EIR.

A total of 66 comment letters were received. A list of commenters is shown on the following page. The comment letters have been numbered and organized into the following categories:

- Topical Responses
- State and Local Agencies
- Private and Local Organizations
- Individuals

The original bracketed comment letters are provided followed by a numbered response to each bracketed comment. Individual comments within each letter are numbered and the response is given a matching number. Where responses result in a change to the Draft EIR, it is noted, and the resulting change is identified in Section 2.0, Corrections and Additions to the Draft EIR.

LIST OF PUBLIC AGENCIES AND PRIVATE PARTIES COMMENTING ON THE DRAFT EIR

State and Local Agencies

2. California Department of Transportation, October 8, 2013
Private and Local Organizations

3. Glendale Historical Society, October 14, 2013
4. Los Angeles Conservancy, October 14, 2013

Individuals

6. Diane Lewis, October 7, 2013
7. Randall Bloomberg, October 7, 2013
8. Ely Lester, October 7, 2013
9. Carolyn West, October 7, 2013
10. Judy Bruce, October 7, 2013
11. Linkchorst, October 7, 2013
12. Joemy Wilson, October 8, 2013
13. Cathy Green, October 8, 2013
14. Sam Manoukian, October 8, 2013
15. Alexander Sardarian, October 8, 2013
16. David Alishan, October 8, 2013
17. John Ballon, October 8, 2013
18. Matteo Bitetti, October 8, 2013
19. Lawerence Cimmarusti, October 9, 2013
20. Pierre Chraghchian, October 9, 2013
21. Ara Aroustamian, October 9, 2013
22. Ellen Svaco, October 10, 2013
23. Nancy Bain, October 10, 2013
24. Bruce Merritt, October 10, 2013
25. Sue Flocco, October 10, 2013
26. Tom Jacobsmeyer, October 10, 2013
27. Alex Avakian, October 10, 2013
29. Albert Babayan, October 11, 2013
30. Marty Bracciotti, October 11, 2013
31. Kama Hayes, October 11, 2013
32. Rima Hayes, October 11, 2013
33. Janet Harootun, October 11, 2013
34. Gilda Killeen, October 11, 2013
35. Tatiana Eremima, October 11, 2013
36. Janin Massoomian, October 11, 2013
37. Denise Walker, October 11, 2013
38. Anita Rinaldi-Hamden, October 11, 2013
39. Catherine Jurca, October 11, 2013
40. Sonia Montejano, October 11, 2013
41. Ruth Campbell, October 11, 2013
42. Alex Rojas, October 11, 2013
43. Marilyn Oliver, October 11, 2013
44. Scott Lasken, October 11, 2013
45. Ara Mirzayan, October 12, 2013
46. Anita Weaver, October 12, 2013
47. Viktoryia Shypkova, October 12, 2013
49. Don Savarese, October 13, 2013
50. Marcia Hanfor, October 13, 2013
51. Christina Rizzo, October 13, 2013
52. Jeff Sredni, October 13, 2013
53. Sean Bersell, October 14, 2013
54. Desiree Shier, October 14, 2013
55. Scott Fraser, October 14, 2013
56. Stephanie Schus, October 14, 2013
57. Tony Riccio, October 14, 2013
58. Gerri Cragnotti, October 14, 2013
59. Judy Cabrera, October 14, 2013
60. Ute Baum, October 14, 2013
61. Sharon Weisman, October 14, 2013
62. Bill Nicoll, October 14, 2013
63. Anna Rundle, October 14, 2013
64. Jean Christensen, October 14, 2013
65. Talin Zadourian, October 14, 2013
66. Elizabeth Berry, October 14, 2013
TOPICAL RESPONSES

Topical Response 1 – Historic Resources Assessment

This topical response was developed to respond to comments received on the Draft EIR that claim the building at 3901 San Fernando Road is a historic resource. A supplemental report to this topical response and the Final EIR, is provided in Appendix F01.

Association with Historic Persons or Events

The October 14, 2013 Historic Resource Assessment Report (Report) by Historic Resources Group (HRG) calls L. H. Wilson “a prominent Glendale realtor, developer, and real estate speculator, and the leading figure in the development of San Fernando Road into the industrial corridor it remains today”¹ and concludes that the building at 3901 San Fernando Road is eligible for the California Register of Historical Resources for its “close association with the early development of San Fernando Road as a major industrial corridor. It is also closely associated with L. H. Wilson, who is important to local history as the leading figure credited with the development of San Fernando Road as a major industrial corridor.” The Report also says the building is eligible for listing in the Glendale Register of Historic Resources because “it exemplifies significant contributions to the broad economic heritage of the city, and is associated with a person who significantly contributed to the history of the city.”²

The basis for these conclusions is that “Wilson was consistently cited in contemporary news stories as an important and influential person in the development of San Fernando Road.”³ A review of the information referenced by HRG demonstrates that these conclusions are erroneous.

Content of Cited Newspaper Articles

Review of the newspaper stories cited shows that some of the stories are marketing pieces. In the 1920s, it was the practice of Southern California newspapers to feature promotional articles in their January 1, New Year’s Day, edition. These articles provided copy for the typically slow news day. The title of the Glendale Evening Post article from January 1, 1924, “L. H. Wilson Makes Things Hum on San Fernando Road,” is in keeping with the tenor of these marketing articles that promoted private and public real estate and infrastructure development in Southern California.

The Report also cites a Los Angeles Times article “Progress in Southern California Industry” which is the heading of the page in the newspaper ⁴ The page contained many articles about activity throughout

¹ Historic Resource Assessment 3901 San Fernando Road, Historic Resources Group, 2013. p. 2.
³ Historic Resource Assessment 3901 San Fernando Road, Historic Resources Group, 2013. p. 13.
Southern California including: “Industrial Realty Active, Property Brokers Report Many Transactions for Manufacturing Firms Recently”; “Industrial Structures Costs Low, Concrete Type Units Held Cheaper to Build Now Than in Several Years”; “New Plants Needs Held Beneficial, Factory Expansion Results in Purchase of Cranes from Local Manufacturer.”

One article on the page about Glendale was entitled “Glendale Lists New Factories, Industrial Expansion Seen for Future; Many manufacturers Plan Plant Addition; City Seeks to Obtain More Enterprises.” The article mentions L.H. Wilson in terms of his positions as Chair of the Industrial Committee of the Chamber of Commerce and President of the Glendale Realty Board to comment on the general state of industrial development and building in Glendale. One paragraph stated that Wilson conducted surveys of the status of existing businesses. Another paragraph called Wilson an “industrial expert” and noted he was “erecting six buildings.” Wilson was listed one more time in a quote where he declared that “Glendale is progressing because of its policy of encouraging sound, well-established firms to locate here.” The article writer considered “several factors enter into the expansion of Glendale’s industrial district,” including “Proximity to Los Angeles and its railroads, as well as to the harbor, low initial cost of factory sites, small labor turnover, low-priced gas for owner, and good roads contribute to the advantages the factory owner demands.” Although Wilson was mentioned, the article clearly addressed Glendale’s industrial growth as a whole – Wilson was not the focus.

The Los Angeles Times had one two-paragraph piece about L. H. Wilson, “Broker Builds City Industry,” on October 14, 1928. That article said Wilson was credited with having brought 14 industrial companies to Glendale that year and that he “had a hand in the establishment of 70 industrial concerns there.” The short article did not explain what Wilson had done with respect to these 70 industrial concerns, and the Report provides no further information or detail to substantiate these claims.

A Los Angeles Times article, “Industrial Will Make Rare Alloy,” makes mention of L.H. Wilson at the end of the article saying “the factory is held on a 99 year lease by L. H. Wilson Industrial Realty Ltd which has leased the structure and grounds to Dr. Stadt and his associates.” Another article cited in the Report was about a glass-tile factory site that had been leased from L. H. Wilson. In 1929, an article in the Los Angeles Times mentioned a shoe company on Standard Avenue that was moving to a factory building constructed by Wilson. Other newspaper articles referenced in the Report include one about the subject building in the local Glendale newspaper (November 19, 1930); another in the local newspaper entitled “Wilson

5 Los Angeles Times, June 23, 1929.
6 Los Angeles Times, June 23, 1929.
7 Los Angeles Times, September 15, 1929.
8 Los Angeles Times, December 16, 1928.
9 Los Angeles Times, July 7, 1929.
Brings New Factories” (August 4, 1928), a Los Angeles Times story about the Realty Board of Glendale’s election, (Nov. 8, 1930), and Wilson’s obituary from the Glendale News-Press from 1942. *Analysis of Newspaper Articles*

A comprehensive analysis of these newspaper articles reveals that while Wilson was mentioned in about 10 stories in the 1920s, those references were not consistent and in most cases, were not significant. The story with the headline “L. H. Wilson Makes Things Hum on San Fernando Road” from 1924 was a marketing piece in the New Year's Day promotional content. In other stories Wilson was mentioned in a limited fashion. One news story from 1928 is two paragraphs long and simply states that Wilson “built nine industrial buildings and sold five” but provides no further information.\(^{10}\) It also mentioned that Wilson had “a hand” in 70 “industrial concerns.” This short story did not explain Wilson’s level of involvement or define what constituted an “industrial concern.” The article certainly does not support a claim that Wilson established 70 buildings and/or businesses. Other articles reference Wilson at the end and simply note that he had leased property to others. The references in these newspaper articles do not support the contention that Wilson was an “important and influential person” of historic significance based on his professional career as a real estate broker, speculator, and developer.

The Report also states that Wilson was active in both professional associations and civic organizations. It notes his service on the Glendale Realty Board, including his time as President, and cites a Los Angeles Times article (November 8, 1930) about the Glendale Realty Board election.\(^{11}\) This article is about the election of new President and listed Wilson as the outgoing President. No write-up was provided about Wilson’s tenure. In fact, Glendale historians E. Caswell Perry and Carroll W. Parcher in their book, Glendale Area History, list 47 Presidents of the Glendale Realty Board. The book did not highlight or discuss L. H. Wilson’s term on the Board as President.

Wilson’s record of service to his community is similar to that of many professionals. He was active with the Chamber of Commerce and its Industrial Committee, the California Real Estate Association, and a Parks Board. None of those general affiliations support the claim that Wilson was a figure of historic significance, and the Report did not provide any further information or context as to why Wilson’s service, typical of engaged professional community members, is significant.

Moreover, the Report states that Wilson “with his extensive holdings along San Fernando Road, was a leader in the effort to widen” San Fernando Road. However, there is no data provided to support the

\(^{10}\) Los Angeles Times, October 14, 1928.
\(^{11}\) Los Angeles Times, November 8, 1930.
supposition that his holdings were extensive or that he played a significant role in the widening project. The claim is speculative.

In sum, no evidence has been provided to support the conclusion that the building at 3901 San Fernando Boulevard meets the threshold to be eligible for the California Register of Historical Resources or to the Glendale Register of Historic Resource based on association with an historic person or event.

**Architectural Style and Integrity**

The *Report* calls the building at 3901 San Fernando Road a “good and relatively rare extant example of Mediterranean Revival architecture applied to a commercial building in Glendale and illustrates L.H. Wilson’s stated philosophy of constructing attractive substantial buildings to house commercial and industrial uses.”12 This claim is erroneous.

The building at 3901 San Fernando Road was developed by L.H. Wilson. In one newspaper article, Wilson stated that he believed commercial and industrial buildings should be attractive. This design philosophy has been at the heart of many architectural designs over the many centuries that man has been designing buildings; this was not a new concept conceived of and applied by Wilson. The *Report* does not provide other images or descriptions other buildings built by Wilson. The *Report* also mentions “Wilson’s vision for the area.” Although it is not cited, this “vision” is likely from the New Year’s Day 1924 marketing article discussed above, where the article’s author described Wilson as “visioning a San Fernando Road lined solid with brick construction on both sides, straight through Glendale.”13 Having a vision for development of an area or corridor and working towards its implementation is also a concept that was held by many in Glendale through its emergence as a city in the late 19th and early 20th centuries.

A photograph of the subject building from the November 19, 1930 *Glendale News-Press*, provided in Appendix F01, shows the original design and character-defining features of the building and establishes that the one-story wing was constructed at the same time as the two-story building. This photograph also shows the most prominent architectural design feature of the building (a prominent central tower at the corner of the building at the intersection of San Fernando Road and Central Avenue). The central tower was capped by a clay tile hipped roof. Another tower was located at the north end of the San Fernando Road elevation. The building design featured a transition from the two-story building to the one-story wing with a bay segment that angled down from the two-story to the one-story wing. This transition element has been removed with the addition of a second story at that location. Also additional windows were inserted into this new section. Both the two-story and one-story portions of the building originally

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13 *Glendale Evening News*, January 1, 1924.
had roofs of clay tile, all of which have been removed. A parapet was added to the one-story wing, altering its original roof profile.

The building today is missing all of these significant character-defining features. The removal of the central tower, the most prominent feature of the original building, along with the alteration of the angled transition to a two-story flat roof, has resulted in the building becoming squat and boxy unlike the building’s original Mediterranean design. All of the original clay roof tiles have been removed.

The building originally had decorative wood frame windows, some with turned spindles, and doors. All the original windows, including those with spindles, in both the two-story and one-story wings, except for the six upper floor windows, have been replaced with more modern windows. All the original doors have been replaced on the street-facing elevations. Thus, almost two-thirds of the building’s original windows and doors have been removed. In addition, the original tile at the base of the first floor display windows on the San Fernando Road elevation has been removed.

The San Fernando Road façade also featured a tower at its north end. This tower feature was capped with a clay tile roof. Attached to it, delineating the end of the building was a projecting wall that held a decorative window with a clay tile overhang and also held a period projecting blade sign. All of these elements have been removed. Photographs showing these alterations are attached to this report.

In the 1970s, a screen was applied over the original exterior façade consisting of vertical metal louvers covering the face of the building in an attempt to “modernize” its aesthetic. The louvers were removed when the building was renovated in the early 1990s and the holes where the louver attachments were placed remain. As part of that renovation, the paint was removed from the brick window surrounds and the building was seismically retrofitted. A large billboard structure positioned on the roof at an angle similar to the building’s angled corner entrance bay was also added to the building at the later date.

Most of these alterations listed above were recognized in the Report: “mansard roof was clad in clay tiles. The brickwork has since been exposed, and the clay tile roofing has been removed. Other alterations include the addition of a commercial billboard to the second floor roof; a parapet along the south façade of the one-story wing; a parapet atop the shed-roofed transitional bay between the one- and two-story volumes; the replacement of some second-story windows on the west (rear) façade; and the replacement of the ground floor storefronts with aluminum storefront systems.” Despite these numerous changes the Report comes to the erroneous conclusion that the building is historic. That error is compounded by the fact that the Report describes the two towers that were removed as “small rooftop towers at the southeast and northeast corners of the two-story element.” The photograph of the original building design,
however, shows that the tower element at the southeast corner (on the angled corner entry bay) is a prominent central feature of the building; it is not a “small rooftop tower.”

Architectural historians David Gebhard and Harriette Von Breton in their book, *L.A. in the Thirties: 1931–1941*, observed “the imagery employed for L.A.’s commercial architecture of the 30s mirrored the shifts in architectural fashion occurring throughout the U.S. during this decade…. L.A. architects discarded the favored packaging of the 20s, the Spanish Colonial Revival and the Zigzag Moderne or Art Deco, replacing these earlier garments with the Streamline Moderne and the Hollywood Regency…. The curved surfaces horizontal emphases, portholes, and glass brick of the Streamline Moderne made it plain that here indeed was the future… The urge to recreate Spain and the Mediterranean in California was no longer pursued with as great a passion as it had been in the 20s.”

The use of the Mediterranean style with its Moorish influences at the subject building occurred as this style was in its waning years. Most of the significant character-defining elements that defined the original Mediterranean and Spanish Colonial Revival style of the building (the prominent clay-tile capped central tower, the north tower, the angled transition, the original windows with turned spindles and the roof’s clay tiles) have been removed and replaced from the subject building. This loss of original character-defining features and historic materials has also resulted in the loss of its overall design, turning the building into a squat, boxy stucco-clad structure clad building.

In sum, the building at 3901 San Fernando Road is not a good example of a Mediterranean Spanish Colonial Revival style building. The building was constructed at the end of the period when Mediterranean style was popular and when the design philosophy for industrial buildings had moved to modern designs employing new 20th century materials. The building has undergone major alterations including the loss of its prominent central tower and most windows and doors. As a result, the original design has been significantly degraded and a majority of the building’s original historic fabric has been removed. The building at 3901 San Fernando Road does not qualify for the California Register of Historical Places or the Glendale Register of Historic Places on the basis of its architecture.

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Topical Response 2 – Feasibility of Alternative 2

This topical response responds to comments received on the Draft EIR in support of Alternative 2 – Reduced Density/Reuse of 3901 San Fernando Road (Alternative 2), as well as comments that question the Draft EIR’s determination that Alternative 2 would not be economically feasible because the reduced development density and revenue from this Alternative would not be sufficient to offset the cost of the proposed Project’s land, as described on page 7.0-19 of the Draft EIR. The Draft EIR details the features of Alternative 2 that substantiate the determination that this Alternative’s reduced density and revenue would not offset the cost of land, including its reduced number of residential units (88 units instead of the proposed Project’s 142 units, or 54 fewer units), its diminished square footage for the proposed commercial retail from 11,600 square feet (sf), as contemplated for the propose project, to 6,400 sf, and the retention and rehabilitation of the existing commercial building, including costs associated with this retention and rehabilitation as described on pages 3.0-6 – 3.0-15, 7.0-4, 7.0-5 and 7.0-19 of the Draft EIR.

The City has received and evaluated information from the applicant which supports the determination that Alternative 2 is not economically feasible as a result of these features of Alternative 2 as described fully in the pro forma and notes attached as Appendix F02. This data indicates that, assuming a mixed-use residential and retail development with Alternative 2's features, this development would have a stabilized value of $27,880,160, total development costs of $27,601,224 and a combined residual land value (for both the retail and apartment parcels) of $1,386,998. Because the applicant acquired the parcels forming the project site at a price of $3.3 million, development of Alternative 2 would result in a shortfall of nearly $2 million between its residual land value and the cost of the land’s acquisition. When the total development costs of Alternative 2 and land acquisition cost are taken into account, development of Alternative 2 would result in a loss of over $3 million ($27,601,224 + $3,300,000 (land acquisition cost) = $30,901,224 - $27,880,160 (stabilized value of development) = $3,021,064 in loss). In view of these shortfalls, development of Alternative 2 makes no economic sense and is financially infeasible. As noted in Appendix F02, this infeasibility springs from both reduced revenue and untenable costs based on the following considerations, among others:

1. Having 54 fewer residential units means that income will fall by about $1,263,000 annually (54 units x $1,950 average monthly rent per unit = $105,300 per month x 12 = $1,263,000).

2. The commercial building has below-market rents from the existing retail, studio, and office space, which would continue under Alternative 2.

3. Since the land cost is fixed, whether 142 units or 88 units are constructed, it makes economic sense to maximize the number of units; as noted above, the land cost does not justify building only 88 units.

4. Many other costs are the same or substantially the same so that advise in favor of maximizing density, including such construction costs as elevators, fire escapes, staircases, exit signs, garage gate, pool landscaping, and common area amenities; marketing costs incurred after construction; sales
center and model costs; architectural and engineering fees; repair and maintenance; property insurance; replacement reserves; and payroll.

5. Retaining the commercial building will require substantial rehabilitation work at a considerable cost, including a new roof, handicap restrooms, elevator, fire sprinkler system, fire alarm system, and air conditioning units; extensive tenant improvements; extensive sound proofing of the existing studio; and rehabilitation of all windows to prevent leakage and energy loss.

6. Protecting the commercial building (built in the 1930s and composed of brick) during construction of the subterranean parking will involve a significant increase in costs because shoring will be needed for the building and must be over-engineered at the south end, and bracing and rackers will be necessary.

7. Added construction costs will also be incurred because the new building’s structural design must take into account the seismic reinforcement of the commercial building (done in the 1990s), which is designed to react in a certain way in the event of an earthquake.

8. The economic benefits from the additional cost of constructing 54 more units far outweigh the loss of income from the proposed Project's reduced size.

9. The applicant cannot recover a development fee, without which a developer would not develop a project, for constructing an 88-unit project.

**Relationship to the Project Objectives**

*State CEQA Guidelines* Section 15126.6 (a) states “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 effect of the project” As described in Table 7.0-1 of the Final EIR, Alternative 2 would attain most of the project objectives. However, this alternative would achieve these objectives to a lesser extent than the proposed project. In particular, because Alternative 2 includes 54 fewer residential units, it would not maximize density in an area that is close to a transit station. In addition the 3901 San Fernando Building would be retained and would not undergo substantial upgrades other than safety upgrades. As a result, the leasable area would not be as attractive to prospective tenants as a new space, and would not maximize the retail potential of the project site. As only a portion of the site would be redeveloped, Alternative 2 would not attain the objective of revitalizing the San Fernando Corridor to the same extent at the proposed project. Alternative 2 would also provide eight fewer affordable housing units (four affordable units total) than the proposed project, and therefore meet the objective of providing affordable housing, but not to the same extent as the proposed project. Lastly, the City emphasizes providing housing in urban settings in proximity to employment, transportation, public facilities, and goods and services. The project site meets the City’s criteria in that it is in an urban setting in close proximity to employment, transportation, public facilities and goods and services. Alternative 2 would not maximize the housing units provided on the site as no housing would be provided in the reuse building.
September 17, 2013

Mr. Rather Duong, Planner

City of Glendale
633 East Broadway, Room 103
Glendale, CA 91026

RE: SCH#2013031055 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Glendale Link Project; located in the City of Glendale; Los Angeles County, California

Dear Mr. Duong:

The Native American Heritage Commission (NAHC) has reviewed the CEQA Notice regarding the above referenced project. In the 1985 Appellate Court decision (170 Cal App 3rd 604), the court held that the NAHC has jurisdiction and special expertise, as a state agency, over affected Native American resources impacted by proposed projects, including archaeological places of religious significance to Native Americans, and to Native American burial sites.

The California Environmental Quality Act (CEQA) states that any project which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064.5(b). To adequately comply with this provision and mitigate project-related impacts on archaeological resources, the Commission recommends the following actions be required:

Contact the appropriate Information Center for a record search to determine: If a part or all of the area of project effect (APE) has been previously surveyed for cultural places(s). The NAHC recommends that known traditional cultural resources recorded on or adjacent to the APE be listed in the draft Environmental Impact Report (DEIR).

If an additional archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. We suggest that this be coordinated with the NAHC, if possible. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a
separate confidential addendum, and not be made available for public disclosure pursuant to California Government Code Section 6254.10.

A list of appropriate Native American Contacts for consultation concerning the project site has been provided and is attached to this letter to determine if the proposed active might impinge on any cultural resources. Lack of surface evidence of archaeological resources does not preclude their subsurface existence.

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archaeological resources, pursuant to California Health & Safety Code Section 7050.5 and California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities. Also, California Public Resources Code Section 21083.2 require documentation and analysis of archaeological items that meet the standard in Section 15064.5 (a)(b)(f). Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Nativo Americano. Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

Sincerely,

[Signature]

Dave Singleton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list
Native American Contacts
Los Angeles County
September 17, 2013

Beverly Salazar Folkes
1931 Shadybrook Drive
 Thousand Oaks, CA 91362
fookes9@msn.com
805 492-7255
(805) 558-1154 - cell
fookes9@msn.com

Chumash
Tataviam
Fernandeño

San Fernando Band of Mission Indians
John Valenzuela, Chairperson
P.O. Box 221838
Newhall, CA 91322
tsen2u@hotmail.com
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Fernandeño
Tataviam
Serrano
Vanyume
Kitanemuk

Gabrieleno/Tongva
San Gabriel Band of Mission Indians
Anthony Morales, Chairperson
PO Box 693
San Gabriel, CA 91778
GTTricalouncil@aol.com
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 -FAX

Gabrieleno Tongva

Tongva Ancestral Territorial Tribal Nation
John Tommy Rosas, Tribal Admin.
Private Address
Gabrieleno Tongva
tattnlaw@gmail.com
310-570-6567

Tataviam
Gabrieleno Tongva

Shoshone Paiute
Yaqui

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of the statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 597.34 of the Public Resources Code and Section 597.36 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed S0CH20133031055; CEQA Notice of Completion; draft Environmental Impact Report (EIR) for the Glendale Link Project; located in the City of Glendale, Los Angeles County, California.
Letter No. 1: Native American Heritage Commission
Response 1-1

The City of Glendale acknowledges the responsibilities of the Native American Heritage Commission (NAHC). No conditions exist that suggest human remains are likely to be found on the project site. Due to the level of past disturbance on-site, it is not anticipated that human remains, including those interred outside of formal cemeteries, would be encountered during earth removal or disturbance activities. If human remains are discovered during the construction process, the Los Angeles County Coroner’s office would be notified immediately (California Health and Safety Code Section 7050.5) and all activities in the immediate area of the find would cease until appropriate and lawful measures have been implemented. If the Coroner determines that the remains are Native American, the Coroner would contact the NAHC (California Public Resources Code Section 5097.98 and CEQA Section 15064.5(f)). The NAHC would designate a Most Likely Descendant who will make recommendations concerning the disposition of the remains in consultation with the lead agency and project archeologist.

The Final Mitigation Monitoring and Reporting Program in this Final EIR contains mitigation measures MM 4.3-1 and MM 4.3-3, which require that, in the event of an archeological find, all earthwork within a 200-meter radius shall be suspended until an archeologist has evaluated the nature and significance of the find. Measure 4.3-3 requires compliance with Public Resources Code Section 5097.98 in the event human remains are discovered.
From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Monday, October 14, 2013 8:56 AM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Dept. of Transportation Comment on DRAFT EIR / 3901 San Fernando Rd
Attachments: 201310140855501406.pdf
Importance: High

The attachment contains comments and recommendation from the Department of Transportation.

Rathar

-----Original Message-----
From: NSRicoh@ci.glendale.ca.us 
Sent: Monday, October 14, 2013 5:55 AM
To: Duong, Rathar
Subject:

This E-mail was sent from "RNPD600B6" (Aficio MP C4500).

Scan Date: 10.14.2013 08:55:01 (-0400)
Queries to: NSRicoh@ci.glendale.ca.us
October 8, 2013

Mr. Rathar Duong  
City of Glendale  
633 E. Broadway, Suite 103  
Glendale, CA 91206

Re: Glendale Link Project  
Draft Environmental Impact Report  
SCH#2013031055 IGR#130923/EA  
Vic. LA / 5 / 24.122

Dear Mr. Duong,

The California Department of Transportation (Caltrans) has reviewed the traffic impact study (TIS) included in the Draft Environmental Impact Report for the proposed Glendale Link project. The project consists of construction of a building with 142 residential apartment units, approximately 11,600 square feet of commercial space, 5000 square feet of commercial studio space. A total of 244 parking spaces would be provided on the ground floor and in an underground garage.

The proposed project is estimated to generate approximately 932 net average daily vehicle trips, with 52 occurring in the AM peak hour and 78 in the PM peak hour. The vehicle trip estimate was reduced by 10 percent to account for potential transit usage. Caltrans recommends the project include incentives for future residents to utilize public transit and other modes of transportation. For example, a one-month transit pass for new tenants could be provided as well as bus routes and schedule information. Other mitigation alternatives may include improvements to nearby bus stops and addition of new bus stops.

The vehicle trip estimate was further reduced to account for existing uses. If existing commercial buildings are currently vacant, no trip reduction should be granted as those trips have already been removed from the existing or current scenario.

Future traffic projections only go to 2016, the planned opening year. It is requested that traffic projections extend further to at least 2020 to account for future foreseeable development or to horizon year for the San Fernando Road Corridor Redevelopment Area.

According to the TIS, the proposed project is not projected to significantly impact I-5 or State Route 2 as the proposed project’s trip assignments to them does not exceed 150. We caution the City not to rely solely on Los Angeles County’s Congestion Management Program (CMP) criteria for analysis and significance as it does not adequately analyze for potential cumulative transportation impacts and deficiencies may be overlooked. For example, the 31 related projects include 2,781 residential units and none of those projects by themselves meet the 150 trip threshold for analysis of freeway facilities.

We are pleased that the TIS includes information about I-5, mainly that two I-5 segments operate at level of service E and that it would be maintained with the incremental traffic from the project. Level of service E essentially means that I-5 currently operates at capacity during peak commuting periods.

"Caltrans improves mobility across California"
Mr. Rathar Duong  
October 8, 2013  
Page 2 of 2

Caltrans is concerned with potential cumulative transportation impacts from future development in Glendale and surrounding cities. Caltrans recommends the City of Glendale develop a mechanism to address cumulative transportation impacts onto freeways from future land developments like the proposed Glendale Link. It is often not feasible for individual development projects to fund complicated highway improvements, none the less, they could contribute commensurate with their impacts.

In the future, please require that traffic engineers consult with Caltrans to determine what elements are to be included in the TIS when conducting an analysis of State facilities.

If you have any questions regarding our comments, you may contact Elmer Alvarez, project coordinator, at (213) 897 – 6696 or electronically at Elmer.Alvarez@dot.ca.gov. Please refer to internal record number 130923/EA.

Sincerely,

DIANNA WATSON
IGR/CEQA Branch Chief
Caltrans, District 7

cc: Scott Morgan, State Clearinghouse

"Caltrans improves mobility across California"
Letter No. 2: California Department of Transportation

Response 2-1

Several comments restate the project description and the vehicle trip generation forecast as contained in the traffic study and are introductory in nature and no further response is necessary. The comment regarding incentives for future residents is noted and will be forwarded to the project applicant and decision makers for their review and consideration prior to any action being taken on the project. No significant traffic impacts are expected as a result of the proposed project, therefore no mitigation alternatives are required.

Response 2-2

As noted on page 30 of the final traffic impact study, approximately 1,000 square feet of the 14,380-square-foot existing industrial building is currently vacant. As such, 1,000 square feet of the industrial space has been deducted from the existing building size and therefore has not been included in the determination of the existing use trip generation credit for the site.

Response 2-3

The comment requests that the future traffic projections be extended beyond year 2016 (i.e., the planned opening year) to at least year 2020. The traffic impact study included analysis of five intersections within the sole jurisdiction of the City of Glendale and two mainline freeway segments under the jurisdiction of the California Department of Transportation (Caltrans). In order to respond to the comment, a supplemental analysis for those locations under Caltrans jurisdiction (i.e., the two I-5 mainline freeway segments) was prepared for future year 2020 conditions. The two I-5 mainline freeway segments (No. 1005 and No. 1055) included in the analysis in Section 4.9 of the Draft EIR are located along the I-5 Freeway (north of Los Feliz Boulevard and south of Glendale Boulevard.) The supplemental freeway analysis was prepared based on the latest edition of the Highway Capacity Manual (2010) operational analysis methodologies pursuant to the California Department of Transportation’s (Caltrans) Guide for the Preparation of Traffic Impact Studies, December, 2002. Based on the analysis results presented in Table A (included in Appendix F03) and application of the Caltrans LOS standards and guidelines to the year 2020 future with project scenario, the proposed project is not expected to create significant impacts at any of the study freeway segments. Incremental, but not significant, traffic impacts are noted at the study freeway segments. Copies of the HCM freeway analysis data worksheets are provided in the Appendix F03.

Response 2-4

The comment cautions the City of Glendale to not rely solely on the Los Angeles County’s Congestion Management Program (CMP) criteria for analysis (i.e., adding 150 or more trips [in either direction]
during either the AM or PM weekday peak hours) and significance thresholds (i.e., causing or worsening Level of Service F and an increase in traffic demand by 2 percent of capacity). While page 69 of the Draft EIR traffic impact study (included in Appendix 4.9 of the Draft EIR) does note the CMP analysis guidelines, the traffic impact study did not rely solely on the CMP for analysis criteria and significance. In fact, while the proposed project will not add 150 or more trips in either direction during either the weekday AM or PM peak hours, two Caltrans mainline freeway locations were included in the Draft EIR traffic analysis. The two freeway mainline locations referenced in Response 2-3, above were selected for analysis since the greatest concentration of project-generated vehicle trips are expected to occur at these locations. Refer to Response 2-3 for a full summary of mainline freeway analysis contained in the Draft EIR traffic impact study and the supplemental analysis. No changes in mainline freeway density (pc/mile/ln: passenger cars per mile per lane) or Levels of Service (LOS) are expected due to the proposed project for the future year 2016 and 2020 conditions.

With respect to the significance thresholds employed in the Draft EIR traffic study for the five intersections, the more stringent City of Glendale significance thresholds were employed and not the CMP significance criteria. The City of Glendale defines a significant traffic impact when a project results in a 2 percent or more increase in the volume to capacity ratio at Level of Service D, E, or F. As shown on Table 10-1, page 58 of the Draft EIR traffic impact study, no significant traffic impacts at any of the analysis locations are expected due to the proposed project. As noted, this conclusion is based on the more stringent City of Glendale significance threshold and no further analysis is therefore warranted.

Page 4.9-35 of the Draft EIR provides a cumulative intersection analysis. As stated on page 4.9-35 of the Draft EIR, in order to determine the operating conditions of the street system under the year 2016 future with project traffic conditions, traffic to be generated by the proposed project was added to the year 2016 future without project conditions. As shown in Table 4.9–8, Future With Project Weekday Volume-to-Capacity Ratios and Levels of Service, (page 4.9-38 of the Draft EIR) the addition of project traffic would not increase the v/c ratio by 0.02 or more. Cumulative impacts were determined to be less than significant.

Response 2-5

The comment affirms Caltrans’ acknowledgement that the two I-5 segments will continue to operate at LOS E conditions with the incremental traffic from the project. No further response is required.

Response 2-6

The City acknowledges Caltrans’ comments and looks forward to working collaboratively with Caltrans on future projects.
Dear Rathar:

Please find attached The Glendale Historical Society's comment letter dated October 14, 2013 and a historic resource assessment on the building at 3901 San Fernando Road prepared by Historic Resources Group (HRG) dated October 14, 2013. Both the letter and HRG’s report are submitted in response to the Draft Environmental Impact Report (DEIR) for the proposed Glendale Link Project.

Thank you for the opportunity to provide comment on this project.

Regards,
Greg

Greg Grammer, President
The Glendale Historical Society
www.glendalehistorical.org
October 14, 2013

Rathar Duong, Planner
City of Glendale Planning Division
633 E. Broadway, Room 103
Glendale, CA 91206-4386

RE: Glendale Link Project - Comments on Draft Environmental Impact Report (DEIR)

Dear Mr. Duong:

On behalf of the Board of Directors of The Glendale Historical Society (TGHS), I would like to thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Glendale Link Project. Established in 1979, TGHS is a non-profit organization with more than 500 individual members dedicated to the preservation of Glendale’s history and architectural heritage through advocacy and education.

TGHS is concerned about the significant adverse impacts of the proposed Glendale Link Project, which would result in the demolition of a rare and distinctive example of Mediterranean Revival commercial architecture located at 3901 San Fernando Road. TGHS believes that the structure, built in 1930 by Lloyd H. Wilson, is a potential historic resource, and, as such, has retained the services of Historic Resources Group (HRG) to review the Historic Resource Evaluation in the DEIR (Section 4.3 – Cultural Resources) prepared by Kaplan Chen Kaplan dated August 27, 2013. HRG has compared the DEIR’s evaluation with its own independent research and assessment and has determined that the building at 3901 San Fernando Road is eligible for listing in the California and Glendale Registers. Included with this letter is HRG’s Historic Resource Assessment dated October 14, 2013.

Historic and Architectural Significance

The DEIR concludes that 3901 San Fernando Road is not associated with any events that contribute to the patterns of local, state, or national history. However, HRG’s assessment clearly demonstrates that the property is closely associated with the development of San Fernando Road as an industrial corridor, having been constructed and occupied by L. H. Wilson, who is personally credited in contemporary accounts as the leading figure in that development. The San Fernando Road industrial corridor was a significant factor in the economic development and growth of Glendale and the surrounding area in the 1920s and beyond. In addition, as many buildings along San Fernando Road dating to this period have been lost, 3901 San Fernando is important as a rare, remaining example of this period in the City’s development.

The DEIR also determines that 3901 San Fernando Road is not associated with the lives of persons important to local, California, or national history, and states that “there is no evidence that [Wilson’s] contribution to the development of San Fernando Road meets the threshold of historic significance.” This
conclusion is likewise unsupported by the evidence. HRG’s assessment shows through numerous contemporary accounts that Wilson was the leading figure in the effort to develop San Fernando Road as an industrial corridor, and was personally responsible for bringing at least 70 businesses to the area in the 1920s alone. Contrary to the assessment in the DEIR, it is HRG’s opinion that L.H. Wilson does rise to the level of an important person in the history of Glendale.

As HRG’s assessment makes clear, not only is the building architecturally and historically significant due to its relationship to L.H. Wilson at the time of his development of the San Fernando Road corridor, but the building is associated with events that have made a significant contribution to local history. The building exemplifies significant contributions to the broad economic heritage of the City during the 1920s and 1930s. Furthermore, it represents the type of industrial building with attractive design architecture that L.H. Wilson built along the San Fernando Road corridor in order to solicit industrial tenants.

The DEIR is further flawed in its assessment that the building’s one-story wing was a 1937 addition and that it has a separate address (1601 Central). As indicated in HRG’s report, a photograph of the building in the Glendale News Press dated November 19, 1930 conclusively demonstrates that the one-story wing was an original and integral part of the building and not a later addition. And even if, counter to all existing evidence, the one-story wing were a 1937 addition, which it is clearly not, that fact would not impact the building’s historic eligibility. The wing would have been constructed during the property’s period of significance by the original owner; therefore, it would have achieved significance in its own right.

The DEIR also concludes that 3901 San Fernando Road lacks sufficient integrity due to “major alterations” and is therefore ineligible for listing in the National, California, or Glendale Registers. As indicated in the attached assessment, it is HRG’s professional opinion that, although the building has undergone alterations, it retains sufficient integrity to convey its Mediterranean Revival architectural character and its significant associations with L.H. Wilson and the development of San Fernando Road. While it lacks sufficient integrity for listing in the National Register, it meets the stated integrity threshold for listing in the California Register. It should be noted that in order to be eligible for listing in the California and Glendale Registers, a property is required to meet only one of the specified designation criteria.

According to California Environmental Quality Act (CEQA) guidelines, “resources which are deemed significant in a historical resource survey as provided under Section 5024.1(g) are to be presumed historically or culturally significant unless ‘the preponderance of evidence’ demonstrates they are not.” The property was found eligible for listing in the National Register in the City’s 1995 San Fernando Road Corridor survey. Although it was erroneously associated with Tropico in the 1995 evaluation, that survey also noted that the building was “the only example of a Moorish Revival-style commercial building extant within the San Fernando Road project area.” In addition to its association with Tropico, it was determined eligible “for its local architectural significance... and also for its association with the early commercial development of San Fernando Road.” The building has not been significantly altered since 1995, and therefore it appears that there is sufficient evidence of historical significance for purposes of CEQA.

**Environmentally Superior Alternative**

TGHS strives to find win-win solutions, which we feel is possible with this project. As such, TGIIS

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supports “Alternative 2 – Reduced Density/Reuse of 3901 San Fernando Road” identified in the DEIR (Section 7 – Alternatives), an environmentally superior alternative that meets most of the project objectives while retaining the existing structure. While the DEIR indicates that Alternative 2 would not be financially feasible, no economic analysis has been provided. Any findings regarding an alternative’s financial infeasibility (or feasibility) should be supported by substantial evidence and independently analyzed by the City.

Again, thank you for the opportunity to comment on the Draft EIR for the Glendale Link Project. Please contact me at greg.grammer@glendalehistorical.org or at 818-242-7447 if you have any questions.

Sincerely,

[Signature]

Greg Grammer, President
The Glendale Historical Society

cc: Hassan Haghani, Director of Community Development
    Jay Platt, Planner, Senior Urban Designer
HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

October 14, 2013

HISTORIC RESOURCES GROUP
12 S. Fair Oaks Avenue, Suite 200, Pasadena, CA 91105-1915
Telephone 626 793 2400, Facsimile 626 793 2401
historical.com
INTRODUCTION

Historic Resources Group has evaluated the commercial/industrial property located at 3901 San Fernando Road in the City of Glendale, California for potential historic significance. Our review included an observation of the project site; research of building permits, Sanborn fire insurance maps, and other primary and secondary sources; and a review of the Cultural Resources Section of the Draft Environmental Impact Report (DEIR) for the project currently proposed for the site. The conclusions in this report are based on a review of the relevant historic contexts and an analysis of the eligibility criteria and integrity thresholds for listing in the National Register of Historic Places, the California Register of Historical Resources, and the Glendale Register of Historic Resources.

HISTORIC CONTEXT

The subject property is located on the northwest corner of the intersection of San Fernando Road and Central Avenue in the southernmost portion of the City of Glendale. This intersection was historically the commercial center of the town of Tropico, platted in 1887 by real estate speculators on land that had formerly been part of the Rancho San Rafael. The town was named after a nearby Southern Pacific rail depot, and evolved from ranch and farm lands into a small community inhabited by commuters to nearby Los Angeles. In 1905 John A. Logan (1878-1960), a civic leader in the development of Tropico, built a two story brick building on the northwest corner of the intersection. The Logan Building housed the Tropico Mercantile on the ground floor; the second floor was a hall used by community organizations and for social events. The building also temporarily housed the Tropico Public Library from the time it was established until it moved to a permanent location. The property at that time had the address of 223 South San Fernando Road, which was later changed to 1519-1529 South San Fernando Road. Tropico was consolidated by the City of Glendale in 1918.

Lloyd H. Wilson and San Fernando Road

In the early 1920s, the Logan Building was purchased by Lloyd Harmond Wilson (1878-1942), a prominent Glendale realtor, developer, and real estate speculator, and the leading

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4 “Tropico Library to Open,” Los Angeles Herald February 20, 1906, 7.
5 There is a documented misperception that the existing building on the site was the original home of the Tropico City Hall. The source of this confusion may stem from the use of the Logan Building as the temporary Tropico Public Library. However, the existing building was constructed after Tropico was annexed by the City of Glendale, and therefore could not have housed Tropico City Hall.

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figure in the development of San Fernando Road into the industrial corridor it remains
today.\textsuperscript{4} Wilson was born in Missouri in 1878 and began his career in Chicago in the
publishing and advertising businesses. He moved to Glendale with his family in 1921 and
quickly launched a successful career in real estate development, specializing in industrial
properties in the San Fernando Road area. Wilson played an important role in the city's
commercial life for two decades and was “instrumental in promoting much of the city's
industrial growth and development, especially in the western part of the city.”\textsuperscript{7} Wilson
shrewdly focused his development efforts on San Fernando Road, then primarily a
residential district, because of its strategic location linking Los Angeles and the San
Fernando Valley, and its proximity to both the Southern Pacific and Pacific Electric
railways.\textsuperscript{8} He brokered deals with established businesses, persuading them to move to
Glendale and selling or leasing them properties developed by his company, L.H. Wilson,
Inc.\textsuperscript{9} Within two years Wilson was hailed as the “progressive realtor whose magic wand"
had tripled and quadrupled real estate values in the area and enriched scores of investors:

\textit{The name L.H. Wilson has become synonymous with the remarkable
development along the San Fernando Road. When you say San Fernando road
you think of Wilson, and when you say Wilson you think of the San Fernando
road.}\textsuperscript{10}

By late 1928 Wilson was personally credited with the establishment of 70 separate
industrial businesses in the city in the 1920s,\textsuperscript{11} settling them in extensive tracts he
developed along San Fernando Road and “adding materially to the wealth of Glendale and
paving the way for the distribution of immense sums of money through the different firms
that he has established here.”\textsuperscript{12} In 1928 alone Wilson brokered deals that brought 14
companies to the San Fernando Road area and built nine industrial buildings, five of which
he sold before the end of that year.\textsuperscript{13} By mid-1929 Wilson had signed leases for six more
buildings that were then under construction.\textsuperscript{14} Among the diverse industries Wilson
attracted to Glendale were the Security Baking Company,\textsuperscript{15} the Glendale Glass Tile

\textsuperscript{4} “L.H. Wilson Makes Things Hum on San Fernando Road,”\textit{ Glendale Evening News} January 1, 1924.
\textsuperscript{5} “L.H. Wilson Summoned by Death,”\textit{ Glendale News-Press}, September 5, 1942, 1.
\textsuperscript{6} “L.H. Wilson Makes Things Hum on San Fernando Road,”\textit{ Glendale Evening News} January 1, 1924.
\textsuperscript{8} “L.H. Wilson Makes Things Hum on San Fernando Road,” \textit{Glendale Evening News} January 1, 1924.
\textsuperscript{9} “Brother Builds City Industry,” \textit{Los Angeles Times}, October 14, 1928, A8.
\textsuperscript{11} “Brother Builds City Industry,” \textit{Los Angeles Times}, October 14, 1928, A8.

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Company, the Hollywood Shoe Manufacturing Company, the Hollywood Mosaic Tile Company, the Indium Steel and Alloys Company, and the West Coast Style Shoes Co.

Wilson eschewed mundane industrial designs for his developments, insisting instead on attractive, distinguished architecture. Wilson expressed his development philosophy in discussing plans for the Security Baking Co.:

*We kept away from the stereotyped design of industrial structures and decided to erect a building that would be a credit not only to the industrial section of Glendale but to the business or residential districts as well. Not only have we set our faces steadily against anything shoddy in construction but we insisted on architecture and designs that have added a beautiful building to those that we have erected in this industrial area.*

In addition to his business activities, Wilson was prominent in a number of Glendale professional and civic organizations. He joined the Glendale Realty Board upon his move to Glendale and was recognized as a leader in the organization for the remainder of his life. He served as a Board director for 20 years and, during his term as president in 1929 and 1930, oversaw its complete reorganization under a new charter as the Glendale Real Estate Board. When he resigned from the board shortly before his death he was named an honorary life director in recognition of his service. Wilson also represented the Glendale Board as a director of the California Real Estate Association. He was a leader in organizing the Glendale Industrial association and helped formulate its policies as an executive member. He served a term as president of the Glendale parks board; several terms as a director of the Glendale Chamber of Commerce; and was an active member of several fraternal and social organizations.

3901 San Fernando Road

In the late 1920s, Wilson, with his extensive holdings along San Fernando Road, was a leader in the effort to widen ten miles of the thoroughfare to 55 feet between curbs.

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19 "Industrial Will Make Rare Alloy," *Los Angeles Times* September 15, 1929, D2.
25 Ibid.
complex project required the demolition of existing buildings along both sides of the street, involving 540 separate parcels and more than 1,000 property owners. Among the buildings affected by the street widening plan was the 1905 Logan Building, which Wilson had purchased soon after arriving in Glendale. The Logan Building was demolished in 1929, and in its place the following year Wilson built the present building, the subject of this assessment.

In keeping with his stated design philosophy for the area, Wilson erected a brick building in the Mediterranean Revival style, consisting of a two-story commercial block facing San Fernando Road with a one story industrial wing along South Central Avenue (then called West Eulalia Street). The building was of brick construction with exterior walls veneered in plaster, and featured decorative brick detailing around window and door openings, a brick cornice, small rooftop towers, and pointed arches in the one-story wing along West Eulalia Street. The building’s industrial wing at that time had the address of 343 West Eulalia Street and was originally occupied by the West Coast Style Shoes Co.; L.H. Wilson, who invested in West Coast Style Shoes and served as one of its directors, was credited with bringing the company to Glendale. L.H. Wilson, Inc. maintained its real estate and development offices in the commercial portion of the building until 1938. Since that time, a number of different businesses have occupied the building. L.H. Wilson died in 1942, at the age of 64.

In 1935, the street address of Wilson’s building was changed again to include 3901, 3903, 3905, and 3905 ½ San Fernando Road, as well as 1601 and 1605 South Central Avenue. According to Sanborn fire insurance maps all of these addresses occupied the two-story portion of the building; the one-story wing does not appear to have had a separate address at that time.

Mediterranean Revival Architecture
The property at 3901 San Fernando Road is a good and relatively rare extant example of Mediterranean Revival architecture applied to a commercial/industrial building in Glendale, and illustrates L.H. Wilson’s stated philosophy of constructing attractive,

26 “Allays Fears of Widening Orders on San Fernando,” Glendale News-Press, January 8, 1929, 1.  
27 City of Glendale permit file.  
29 City of Glendale plastering inspection record, August 22, 1930.  
31 Glendale City Directory.  
33 Sanborn fire insurance map, 1950.
substantial buildings to house commercial and industrial uses. The Mediterranean Revival style is distinguished by its eclectic mix of architectural elements from several regions around the Mediterranean Sea, including Spain, Italy, southern France, and North Africa. Much of the American architecture of the late 19th and early 20th centuries can be broadly classified as Mediterranean in origin, including the Beaux Arts, Mission Revival, Spanish Colonial Revival, and Italian Renaissance Revival styles. But by the 1920s the lines between these individual styles were frequently blurred and their distinguishing characteristics blended by architects who drew inspiration from throughout the Mediterranean region. These imaginative combinations of details from varied architectural traditions resulted in the emergence of a distinct Mediterranean Revival style.

In contrast to the more academic and more literal interpretations such as the Andalusian-influenced Spanish Colonial Revival style or the restrained, dignified Italian Renaissance Revival style, the broader Mediterranean Revival frequently incorporated elements of Italian and Spanish Renaissance, Provençal, Venetian Gothic, and Moorish architecture into otherwise Spanish Colonial Revival designs. The Mediterranean Revival style is sometimes more formal and usually more elaborately composed and ornamented than the simpler, more rustic Spanish Colonial Revival style, and often more flamboyant than the sober Italian Renaissance Revival style. Typical features of the Mediterranean Revival style include plaster walls; hipped roofs; arched openings, sometimes with richly detailed surrounds; arcades and loggias; and Classical decorative elements in cast stone, brick, or plaster, including architraves, stringcourses, cornices, pilasters, columns, and quoins.

**Architectural Description of 3901 San Fernando Road**

The property at 3901 San Fernando Road is prominently located on the northwest corner of the intersection of San Fernando Road and South Central Avenue. It contains a one- and two-story commercial/industrial building constructed in 1930. The building is set flush to the sidewalk on the two street sides and to the north property line, and is bounded by an alley on the west. It is Mediterranean Revival in style and has a rectangular plan, with the southeast corner clipped at a 45 degree angle. The building is of unreinforced brick construction and has a two-story mass with a flat mansard roof fronting on San Fernando Road, and a one-story wing with a bow truss roof along South Central Avenue. The mansard is clad in asphalt composition shingles; the flat and bowed roofs are covered in built-up roofing. The walls are veneered in textured cement plaster and trimmed with extensive brick details including decorative quoined window and door surrounds, a double string course framing combed plaster at the second floor level, and a decorative eave cornice composed of two staggered courses of saw tooth headers over spaced headers (at the two story portion) and soldiers (at the one story portion).
Individual retail unit entrances consist of non-original, single, fully glazed metal doors set in glazed metal storefront systems on the east and south façades. A glazed metal door on the north end of the east façade leads to an interior staircase serving the second floor. Fenestration on the east and south façades of the two-story portion consists of large rectangular storefront openings at the ground floor, glazed with non-original metal storefront systems with dark tinted glazing. There are original paired and individual rectangular, fixed, steel sash windows with upper and lower hopper inserts at the second floor. Fenestration on the building's one story wing consists of Moorish-style pointed arches with clear glazed metal storefront over plaster and brick bulkheads along Central Avenue.\textsuperscript{34} The westernmost bay on the south façade has a parapet that projects above the roofline, forming a square tower with a stucco cornice and a brick vent opening centered over the pointed arch below. A continuous stucco parapet has been added above the cornice on the south façade. There is a large sliding industrial fire door on the west façade of the one story portion, and a single metal slab door with a transom light that has been blocked. There is one original steel casement window with wood subsill on the second floor west façade; all other fenestration on this façade has been replaced. Fenestration on the north façade consists of large rectangular original steel sash windows. An exterior staircase on the north façade leads to a wood slab door with transom light at the second floor level.

\textbf{Alterations}

Although it has undergone several alterations over time, the building located at 3901 San Fernando Road has not been significantly altered since it was surveyed in 1995, and it continues to convey its historic significance. The building retains most of its original industrial steel sash fixed and hopper windows, textured cement plaster veneer at the exterior walls, distinctive Moorish-style pointed arches, and extensive decorative brickwork. A 1930 photograph in the \textit{Glendale News-Press} indicates that there were small rooftop towers at the southeast and northeast corners of the two-story element; these have since been removed. The same photo also conclusively demonstrates that the one-story wing is an original element of the building and not a later addition, and that it did not have an overhanging eave.\textsuperscript{35} Photographs from the late1940s and early1950s, included in Appendix 4.3 of the DEIR, indicate that the decorative brickwork was at that time painted.

\textsuperscript{34} “Guests Will See Making of Shoes,” \textit{Glendale News-Press}, November 19, 1930. The article’s accompanying photograph conclusively demonstrates that the one-story wing was an original and integral part of the building and not a later addition. The article is included in the ‘Historic Photograph’ section below.

\textsuperscript{35} Ibid.
The mansard roof was clad in clay tiles. The brickwork has since been exposed, and the clay tile roofing has been removed. Other alterations include the addition of a commercial billboard to the second floor roof; a parapet along the south façade of the one-story wing; a parapet atop the shed-roofed transitional bay between the one- and two-story volumes; the replacement of some second-story windows on the west (rear) façade; and the replacement of the ground floor storefronts with aluminum storefront systems in the original openings. The replacement storefronts in the rectangular openings on San Fernando Road and South Central Avenue have dark tinted glazing which is not compatible with the building’s historic character; however, those in the pointed Moorish arches along Central Avenue have clear glazing which is compatible with the building’s historic character. An exterior stair was added along the north façade in 1983.36

36 City of Glendale permit file.
EVALUATION CRITERIA

Historic resources may be designated at the federal, state, and local levels. Current landmark designations available for properties located in Glendale include listing in the National Register of Historic Places; the California Register of Historical Resources; and the Glendale Register of Historic Resources. While all designation programs place emphasis on architectural character, they also use basic criteria relating to a property’s place in important events or patterns of development, association with important personages, and architectural significance.

National Register of Historic Places

The National Register of Historic Places is “an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation’s cultural resources and indicate what properties should be considered for protection from destruction or impairment,” and is administered by the National Park Service. Listing in the National Register assists in preservation of historic properties through recognition that a property is of significance to the nation, the state, or the community; consideration in the planning for Federal or Federally-assisted projects; eligibility for Federal tax benefits; and qualification for Federal assistance for historic preservation, when funds are available.

In order for a building to qualify for listing in the National Register of Historic Places, it must meet one or more identified criteria of historic significance. “Historic significance” is defined by the National Park Service as “the importance of a property to the history, architecture, archaeology, engineering, or culture of a community, state, or the nation.”

Historic significance is achieved by association with important events, activities, or patterns; association with important persons; distinctive physical characteristics of design, construction, or form; or potential to yield important information. The criteria for listing in the National Register follow established guidelines for determining the significance of properties. Sites, districts, structures, or landscapes of potential significance are eligible for listing if they meet any or all of the following criteria:

A. Associated with events that have made a significant contribution to the broad patterns of our history;

B. Associated with the lives of persons significant in our past;


38 Ibid, 3.

39 Ibid, 3.

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C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. Yield, or may be likely to yield, information important in prehistory or history.\textsuperscript{40}

In addition to meeting one or more of the criteria listed above, properties must also possess “historic integrity.” Historic integrity is the ability of a property to convey its significance and is defined as the “authenticity of a property’s historic identity, evidenced by the survival of physical characteristics that existed during the property’s prehistoric or historic period.”\textsuperscript{40} The National Park Service defines seven aspects of integrity: location, design, setting, materials, craftsmanship, feeling, and association.

**California Register of Historical Resources**

The California Register is an authoritative guide used by State and local agencies, private groups, and citizens to identify the State’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.

The criteria for listing in the California Register are based on the National Register criteria:

1. Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States;
2. Associated with the lives of persons important to local, California, or national history;
3. Embody the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic value; or
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

\textsuperscript{40} Criterion D addresses potential archaeological resources; therefore, it is not analyzed as part of this report.

Resources eligible for listing in the California Register must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. It is possible that resources lacking sufficient integrity for listing in the National Register may still be eligible for the California Register.

City of Glendale Register of Historic Resources
The City of Glendale has adopted historic preservation regulations and established procedures for identifying, designating, and preserving historic resources that are exceptional architectural examples of a particular period or character, have a distinguished history, or were occupied by a distinguished individual. A property may be listed in the Glendale Register of Historic Resources if it meets at least one of the following criteria:

- The proposed historic resource is identified with important events in national, state, or city history, or exemplifies significant contributions to the broad cultural, political, economic, social, or historic heritage of the nation, state, or city;
- The proposed historic resource is associated with a person, persons, or groups who significantly contributed to the history of the nation, state, region, or city;
- The proposed historic resource embodies the distinctive and exemplary characteristics of an architectural style, architectural type, period, or method of construction; or represents a notable work of a master designer, builder or architect whose genius influenced his or her profession; or possesses high artistic values;
- The proposed historic resource has yielded, or has the potential to yield, information important to archaeological pre-history or history of the nation, state, region, or city; and/or
- The proposed historic resource exemplifies the early heritage of the city.

EVALUATION OF POTENTIAL SIGNIFICANCE

Previous Surveys and Evaluations
The building located at 3901 San Fernando Road was surveyed in a 1995-1996 reconnaissance survey for the City of Glendale’s San Fernando Road Corridor Redevelopment Project. The building was identified as “the only example of a Moorish

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Revival-style commercial building extant within the San Fernando Road project area." It was determined eligible for listing in the National Register "for its local architectural significance in association with Tropico as the former Tropico Town Hall, and also for its association with the early commercial development of San Fernando Road."\textsuperscript{43} It was assigned a California Historical Resources Status Code of 35, which at that time was defined as "appears eligible for listing in NR as a separate property."\textsuperscript{44} It is not listed in the California State Historical Resources Inventory.\textsuperscript{45}

**Historic Resource Assessment 3901 San Fernando Road**

**Evaluation of Integrity**

The seven aspects of integrity as applied to 3901 San Fernando Road are:

- **Location:** The building remains on its original site and therefore retains integrity of location.

- **Design:** The building has undergone some alterations over time. The original ground floor storefronts and doors have been replaced; the clay roof tiles have been removed; a parapet has been added along the south façade; and the small rooftop towers have been removed. However, the building retains significant character-defining features of its original Mediterranean Revival-style design, including its rectangular plan; one- and two-story massing; textured plaster veneer at exterior walls; steel sash windows at the second floor; pointed Moorish arches; decorative brick window surrounds, eave cornices, and stringcourse; flat mansard roof; and large square tower on the south façade. It therefore retains integrity of design.

- **Setting:** The existing neighborhood of parking lots, strip malls, and new construction does not reflect the property’s historic setting of mixed commercial and residential uses. The building does not retain integrity of setting.

- **Materials:** Although it has undergone a number of minor alterations over time, the building retains a majority of its historic materials, including its brick construction.

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\textsuperscript{43} Harland Bartholomew \& Associates, "Reconnaissance Survey, City of Glendale San Fernando Road Corridor Redevelopment Project," DPR 523A form, 3901 San Fernando Road, December 1995.

\textsuperscript{44} Harland Bartholomew \& Associates, DPR 523A form, 3901 San Fernando Road, December 1995. The 1995 DPR also lists a second NRHP Status Code of 5, "ineligible for the NR but still of local interest." It is assumed that this status code was listed in error, as it directly contradicts the higher status code of 35 as well as the narrative finding of significance.

\textsuperscript{45} State of California, Office of Historic Preservation, Historic Resources Inventory, August 2011. It does not appear that the 1995 survey was submitted to the State Office of Historic Preservation for inclusion in the HRI.
textured exterior plaster veneer, decorative brick details, and steel sash windows. However, the replacement of the original storefronts and doors, clay roof tiles, and small towers indicate that the building does not retain sufficient integrity of materials for consideration for listing in the National Register of Historic Places.

- Workmanship: Although it has undergone alterations over time, the building retains the physical evidence of period construction techniques, including its masonry construction, plaster veneer, and decorative brick details. It therefore retains integrity of workmanship.

- Feeling: The building retains the significant physical features that convey its significance as a Mediterranean Revival-style commercial building that housed the offices of L.H. Wilson, Inc. It therefore retains integrity of feeling.

- Association: Although it has undergone a number of alterations, the property continues to convey its important association with L.H. Wilson and with the early development of San Fernando Road as a major industrial corridor. It therefore retains integrity of association.

**Evaluation for the National Register of Historic Places**

Based on an evaluation of the building’s integrity, 3901 San Fernando Road does not appear to be eligible for listing in the National Register of Historic Places. The National Register of Historic Places has a more stringent integrity threshold than the California Register, and the removal of original character-defining features of the exterior does not meet that threshold.

**Evaluation for the California Register of Historical Resources**

3901 San Fernando Road appears eligible for listing in the California Register of Historical Resources. Although it does not retain sufficient integrity for listing in the National Register, the building does meet the California Register threshold of retaining enough of its historic character or appearance to be recognizable as a historical resource and to convey the reasons for its significance. As noted above, resources lacking sufficient integrity for listing in the National Register may still be eligible for the California Register.

**Criteria 1 and 2**

3901 San Fernando Road is associated with events that have made a significant contribution to the broad patterns of local and regional history, through its close association with the early development of San Fernando Road as a major industrial corridor. It is also closely associated with L.H. Wilson, who is important to local history as
the leading figure credited with the development of San Fernando Road as a major industrial corridor. Wilson erected the building in 1930 and kept his offices there from 1930 to 1938, during the period that he was influential in the development of this area of Glendale. Although there were a number of real estate investors and realtors working in Glendale during this period, Wilson was consistently cited in contemporary news stories as an important and influential person in the development of San Fernando Road. The building is a rare remaining example of this period of development along San Fernando Road, reflecting Wilson’s vision for the area. Given the building’s important associations and rarity of type, it appears eligible for listing in the California Register under Criteria 1 and 2.

Criterion 3

3901 San Fernando Road is a rare extant example of Mediterranean Revival commercial/industrial architecture in Glendale. Although it has undergone some alterations, the building is a distinctive local example of a 1930s Mediterranean Revival-style commercial/industrial building. It retains significant character-defining features of the style, including its unique pointed Moorish arches, textured stucco wall cladding, finely detailed brickwork, and industrial steel sash windows. The building retains sufficient integrity to convey its architectural significance, and therefore appears eligible for listing in the California Register under Criterion 3.46

Evaluation for listing in the Glendale Register of Historic Resources

3901 San Fernando Road appears eligible for listing in the Glendale Register of Historic Resources. It exemplifies significant contributions to the broad economic heritage of the city, and is associated with a person who significantly contributed to the history of the city, through its association with the early development of San Fernando Road as a major industrial corridor, and with L.H. Wilson, who is credited with that development. Wilson erected the building in 1930 and kept his offices there from 1930 to 1938. Although it has undergone some alterations, the building embodies the distinctive and exemplary characteristics of Mediterranean Revival-style commercial/industrial architecture in Glendale. The building is a unique interpretation of the style with its pointed Moorish arches and fine brick detailing, and is one of the relatively few Mediterranean Revival commercial/industrial buildings from this period remaining in the area. Most have been

46 It is HRG’s professional opinion that 3901 San Fernando Road is eligible for listing in the California Register under three criteria; however, it should be noted that a building is eligible for listing if it meets one or more of the criteria.
completely altered, like the nearby Seeley’s Building (originally constructed in 1925 and remodeled with a Streamline Moderne façade in the 1940s), or demolished. Due to its association with the early development of San Fernando Road; its association with important local person L.H. Wilson; its distinctive architecture; and the rarity of type, 3901 San Fernando Road appears eligible for listing in the Glendale Register of Historic Resources.

CONCLUSION

Through investigation of the relevant historic contexts, an analysis of the building’s integrity, and an evaluation of its potential significance, HRG concludes that the building located at 3901 San Fernando Road meets Criteria 1, 2, and 3 for listing in the California Register of Historical Resources, and is also eligible for listing in the City of Glendale Register of Historic Resources. It has important associations with the development of San Fernando Road as a major industrial corridor; it is associated with L.H. Wilson, who was a leading figure in Glendale’s development during this era and is personally credited with the development of San Fernando Road as an industrial corridor; it is a remnant example of commercial/industrial architecture from this period in this area of Glendale; and it is a relatively rare and distinctive example of Mediterranean Revival-style commercial/industrial architecture in Glendale.

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Glendale Link Project Final EIR
November 2013
## PERMIT HISTORY

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HISTORIC PHOTOGRAPH

Glendale News Press, November 19, 1930

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HISTORIC RESOURCES GROUP
East Façade and partial South Façade, San Fernando Road and South Central Avenue, looking northwest. Historic Resources Group, August 2013.
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3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP
Partial South Façade, South Central Avenue, looking west. Historic Resources Group, August 2013.
Southwest corner, South Central Avenue, looking northeast. Historic Resources Group, August 2013.
West Façade, alley, looking southeast. Historic Resources Group, August 2013.
North Façade, looking southeast. Historic Resources Group, August 2013.

HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP
Detail of windows, East Façade. Historic Resources Group, August 2013.
Detail of brick eave cornice, South Façade. Historic Resources Group, August 2013.
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—. “Reconnaissance Survey, City of Glendale San Fernando Road Corridor Redevelopment Project,” DPR 523A form, 3901 San Fernando Road, December 1995.

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“Realty Board of Glendale Holds Elections.” *Los Angeles Times*, November 8, 1930.

Sanborn Fire Insurance Maps.


HISTORIC RESOURCE ASSESSMENT

3901 San Fernando Road, Glendale, CA

HISTORIC RESOURCES GROUP


3.0 Comment Letters and Responses

Letter No. 3: Glendale Historical Society

Response 3-1

The comment provides introductory information and a summary of the detailed comments provided in the attachment to the letter. Refer to Responses 3-2 through 3-8 for responses to these comments.

Response 3-2

Refer to Topical Response 1, which specifically responds to the claim that the building at 3901 San Fernando Road is a historic resource. As explained in depth in Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR, the building is not an historic resource, and therefore, the project will not have a significant adverse effect on a historic resource.

The October 14, 2013 Historic Resource Assessment prepared by HRG is addressed in Topical Response 1 and Appendix F01.

Response 3-3

Refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR regarding the building at 3901 San Fernando Road’s association with the development of San Fernando Road as an industrial corridor. As explained in depth in Topical Response 1, Section 4.3 of the Draft EIR, and Appendix F01 of the Final EIR, a review of the news sources cited in the HRG report indicates that many of the cited reports were promotional pieces rather than news reports and others had only minor references to Wilson.

Response 3-4

Refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR regarding the building’s association with L.H. Wilson. As explained in depth in Topical Response 1, Section 4.3 of the Draft EIR, and Appendix F01 of the Final EIR, a review of the news sources cited in the HRG report indicates while Wilson was mentioned in about 10 stories in the 1920s, those references were not consistent and in most cases, were not significant.

Response 3-5

Refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR regarding the building's association with local history. As explained in Topical Response 1, Section 4.3 of the Draft EIR, and Appendix F01 of the Final EIR, the design philosophy employed by Wilson has been at the heart of many architectural designs over the many centuries that man has been designing buildings; this was not a new concept conceived of and applied by Wilson.
3.0 Comment Letters and Responses

Response 3-6

The comment indicates the one-story wing is original to the building at 3901 San Fernando Road and provides additional photographs to support this claim. The Supplemental Report included in Appendix F01 recognizes that the one-story wing was constructed at the same time as the two-story building. The fact that the one-story wing was original does not materially change the analysis presented in the Draft EIR. As provided in Appendix F01, the photograph that establishes the one-story wing was original, also shows the most prominent architectural design feature of the building (a prominent central tower at the corner of the building at the intersection of San Fernando Road and Central Avenue). The central tower was capped by a clay tile hipped roof. Another tower was located at the north end of the San Fernando Road elevation. The building design featured a transition from the two-story building to the one-story wing with a bay segment that angled down from the two-story to the one-story wing. This transition element has been removed with the addition of a second story at that location. Also additional windows were inserted into this new section. Both the two-story and one-story portions of the building originally had roofs of clay tile, all of which have been removed. A parapet was added to the one-story wing, altering its original roof profile.

The building today is missing all of these significant character-defining features. The removal of the central tower, the most prominent feature of the original building, along with the alteration of the angled transition to a two-story flat roof, has resulted in the building becoming squat and boxy unlike the building’s original Mediterranean design. All of the original clay roof tiles have been removed. Refer to Topical Response 1 and Appendix F01 to the Final EIR for additional features of the building that are no longer extant. As provided in Topical Response 1, the original design has been significantly degraded and a majority of the building’s original historic fabric has been removed. The building at 3901 San Fernando Road does not qualify for the California Register of Historical Places or the Glendale Register of Historic Places on the basis of its architecture.

Response 3-7

Refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR regarding the integrity of the 3901 building. Based on the evidence provided in Topical Response 1, the City has determined that the building at 3901 San Fernando Road is not a good example of a Mediterranean Spanish Colonial Revival style building. The building was constructed at the end of the period when Mediterranean style was popular and when the design philosophy for industrial buildings had moved on to modern designs employing new 20th century materials. The building has undergone major alterations including the loss of its prominent central tower and most windows and doors. As a result, the original design has been significantly degraded and a majority of the building’s original historic fabric has been removed. The building at 3901 San Fernando
Road does not qualify for the California Register of Historic Places or the Glendale Register of Historic Places on the basis of its architecture, nor, as discussed in Response 3-2 through 3-5 does the building's association with L.H. Wilson make it eligible for listing on the California or Glendale Registers.

Response 3-8

The comment refers to a survey conducted by the City of the San Fernando Road Corridor Redevelopment Project area in 1996. The 1996 study indicated the 3901 building might be eligible for the National Register of Historic Places and the California Register of Historic Resources based on its association with the town of Tropico as it might “have been occupied at one time by the Tropico Town Hall.” As stated on page 4.3-19 of the Draft EIR, further research has clarified the information relied upon by the drafters of the 1996 report. In particular, the survey identified the Tropico Town Hall as being located at the 3901 building, which was incorrect. The building was constructed after the town of Tropico had been annexed to Glendale and never served as the Tropico Town Hall. As such, the building does not meet the criteria to be eligible for the National Register of Historic Places or the California Register of Historical Resources for association with historic persons or events. Further, the survey was a cursory review of the entire redevelopment project area and was not an in depth analysis of the building in question.

The comment also states that no evidence demonstrates that the building at 3901–3915 San Fernando Road has been significantly altered since the mid-1990s and the time of the survey. As described in more detail in the Draft EIR, the 1996 survey included several inaccuracies and as a result, cannot satisfy the criteria required of a historic survey by Public Resources Code section 5024.1(g).

Moreover, the State of California's Office of Historic Preservation considers local surveys on its website and states that "Local surveys are planning tools which, ideally, should continue to enlarge and expand on previously gathered information. While an existing survey over five years old can provide valuable information, it is appropriate to update the survey to ensure that local planning and preservation decisions are based on the most current information available."\(^\text{15}\)

Since the 1996 survey is nearly 20 years old, it well exceeds the five-year timeframe for current information outlined by the state. Therefore, while the 1996 survey provides some useful background information it cannot be considered a reliable analysis of the 3901 San Fernando building. Accordingly, Kaplan Chen Kaplan completed a comprehensive study of the 3901 San Fernando Road building as part of this environmental review and determined that the building is ineligible for listing at the local, state, and national levels.

\(^\text{15}\) http://ohp.parks.ca.gov/?page_id=23317
Response 3-9
Refer to Topical Response 2 and Appendix F02 regarding the feasibility of Alternative 2. As described in Topical Response 2 and Chapter 7.0 of the Draft EIR, this alternative does not meet the project objectives as fully or sufficiently as the proposed project.

Response 3-10
The HRG report is addressed in Topical Response 1 and Appendix F01 of the Final EIR.
From: Adrian Fine [mailto:afine@laconservancy.org]
Sent: Monday, October 14, 2013 3:46 PM
To: Duong, Rathar
Subject: Glendale Link Project - 3901-3915 San Fernando Road

RE: Glendale Link Project - 3901-3915 San Fernando Road

Dear Mr. Duong:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Glendale Link Project, including the proposed demolition of the historic building located at 3901-3915 San Fernando Road. Please see the attached letter from the Los Angeles Conservancy.

Best, Adrian

Adrian Scott Fine | Director of Advocacy | Los Angeles Conservancy
T 213 430 4203 | F 213 623 3909 | afine@laconservancy.org
523 W 6th Street, Suite 826, Los Angeles, CA 90014 | www.laconservancy.org

Get connected: Follow the Conservancy on Twitter and become a Facebook fan today! Join the Conservancy and become an advocate for preservation in L.A. County.
October 14, 2013

RE: Glendale Link Project - 3901-3915 San Fernando Road

Dear Mr. Duong:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Glendale Link Project, including the proposed demolition of the historic building located at 3901-3915 San Fernando Road. As detailed in our Notice of Preparation (NOP) comments on April 18, 2013, the Conservancy strongly feels the building located at 3901-3915 San Fernando Road qualifies as a historical resource as defined by a key policy under the California Environmental Quality Act (CEQA). The proposed project will result in a significant impact to a cultural resource.

We are disappointed that the DEIR fails to acknowledge this and instead relies on analysis that appears to draw conclusions and dismisses the building and its potential significance. To avoid the need for supplemental environmental review and delays, we urge the City to require full consideration of at least one bona fide preservation alternative and the associated thorough analysis before taking any action on the DEIR.¹

I. The building at 3901-3915 San Fernando Road should be treated as a significant historical resource

The analysis within the DEIR states the building at 3901-3915 San Fernando Road does not appear to meet the criteria for inclusion on either the national, state or

¹ A Subsequent EIR or Supplement to an EIR may be required when “substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.” CEQA Guidelines §§15162, 15163.
The Conservancy believes there is substantial evidence provided within the record that otherwise would support an alternative conclusion, one that clearly demonstrates the building at 3901-3915 San Fernando Road meets the minimum threshold for CEQA and consideration as an historical resource.

The City of Glendale's San Fernando Road Corridor Redevelopment Project identified the building at 3901-3915 San Fernando Road as "the only example of a Moorish Revival-style commercial building extant within the San Fernando Road project area." At that time it was determined eligible for listing in the National Register of Historic Places and appearing eligible for the California Register. No evidence demonstrates that the building at 3901-3915 San Fernando Road has been significantly altered since the mid-1990s and the time of the redevelopment project. The DEIR assessment incorrectly states the building has had "major alterations" and therefore lacks significant integrity, rendering it ineligible for listing at the local, state and national levels. Material evidence does not support this claim, nor does the independent assessment performed on the building by Historic Resources Group (HRG).

The HRG report and subsequent evidence demonstrate further errors in the DEIR analysis. For instance, the DEIR assessment states a subsequent one-story wing was added to the main two-story building in 1937. A November 19, 1930 article in the *Glendale News-Press* however demonstrates this to be inaccurate, showing an image of the building at 3901-3915 San Fernando Road as it largely appears today with both the one and two-story sections. This example illustrates a series of inaccuracies and statements within the DEIR that do not support the documentation. We believe the building at 3901-3915 San Fernando Road meets the basic criteria for significance through its association with important events, persons and architecture.

The Conservancy believes there is a substantial level of evidence now entered into the record to suggest the building meets, at a minimum, eligibility for the local City of Glendale Register of Historic Resources. As such the building at 3901-3915 San Fernando Road should be treated as an historical resource as part of the EIR process for the proposed project, and as required through CEQA.

II. The DEIR fails to acknowledge a significant impact, a range of preservation alternatives, and the environmentally superior alternative

A key policy under CEQA is the lead agency’s duty to “take all action necessary to provide the people of this state with… historic environmental qualities…and preserve for future generations…examples of major periods of California history.” To this end, CEQA “requires public agencies to deny approval of a project

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3 Historic Resource Assessment, 3901 San Fernando Road, Glendale, CA. October 9, 2013.
4 Public Resources Code §21001 (b), (c).
with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.”

Courts often refer to the EIR as “the heart” of CEQA, providing decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzing alternatives that would reduce or avoid those impacts. The CEQA Guidelines require a range of alternatives to be considered in the EIR that would feasibly attain most of basic project objectives but would avoid or “substantially lessen” the project’s significant adverse environmental effects. The lead agency cannot merely adopt a statement of overriding considerations and approve a project with significant impacts; it must first adopt feasible alternatives and mitigation measures.

The project’s alternative analysis incorrectly states, “[N]either the proposed project nor Alternative 2 would result in significant impacts; therefore impacts related to cultural resources would be similar to the proposed project.” The Conservancy disagrees and believes there is a significant impact to a known cultural resource. The DEIR all but acknowledges this by providing Alternative 2 -- a reuse/reduced density alternative -- yet fails to state the purpose of this alternative or the importance of the building at 3901-3915 San Fernando Road. Other alternatives may be available but have not been analyzed within the DEIR. Once acknowledged as a historical resource, we believe there needs to be a broader range of reuse/preservation alternatives.

Alternative 2 meets “most of the project objectives” and is considered the “environmentally superior” alternative. However, the DEIR concludes Alternative 2 “would not be sufficient to offset the cost of the land and would not be economically feasible for the applicant for this reason.” While generally economic analysis within a DEIR is not considered paramount under CEQA, the applicant relies on this argument to demonstrate why Alternative 2 is infeasible. CEQA defines feasibility as “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.” In order to prove economic infeasibility the applicant must provide specific “evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project.”

5 Sierra Club v. Gilroy City Council (1990) 222 Cal. App.3d 30, 41; also see PRC §§ 21002, 21002.1.
10 CEQA Guidelines, § 15364
Despite the applicant’s claim, there is no economic analysis provided that supports this within the DEIR. The DEIR’s one-sentence rejection of a reuse alternative is imprecise, incomplete and largely unsubstantiated, ultimately failing to establish the infeasibility of retaining the building at 3901-3915 San Fernando Road.

We feel that creative reuse options exist for the building at 3901-3915 San Fernando Road while meeting most of the project objectives. As demonstrated in Alternative 2, the project site allows for a lot of flexibility. The historic building can remain and be adaptively reused while still allowing for sensitively-designed infill construction.

About the Conservancy

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, established in 1978 to preserve and revitalize the significant architectural and cultural heritage of Los Angeles through advocacy and education.

Thank you for the opportunity to comment of the DEIR for the Glendale Link Project. We urge the City of Glendale to acknowledge the building at 3901-3915 San Fernando Road as an historic resource and require thoughtful consideration of preservation alternatives that would retain and incorporate this building into the project. Please feel free to contact me at 213-430-4203 or afine@laconservancy.org should you have any questions.

Sincerely,

Adrian Scott Fine
Director of Advocacy

cc: Jay Platt, City of Glendale
The Glendale Historical Society
Letter No. 4: Los Angeles Conservancy

Response 4-1

The comment provides introductory information and a summary of the detailed comments provided in the attachment to the letter. Refer to Responses 4-2 through 4-10 for responses to these comments.

Response 4-2

Contrary to the statement made in this comment, the Draft EIR does include a “bona fide preservation alternative.” Specifically, Alternative 2 analyzed a project that would maintain the building at 3901 San Fernando Road as part of the proposed project. Refer to Topical Response 2 and Chapter 7.0 of the Draft EIR for more information about Alternative 2.

Response 4-3

Refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR regarding the eligibility of the building at 3901 San Fernando Road for the national, state or local historic registers. As demonstrated in Topical Response 1, Appendix F01, and provided in the Draft EIR, substantial evidence supports the City’s conclusion that the building is not eligible for the national, state, or local register. In particular, the building is not eligible due to its association with L.H. Wilson or early development of the San Fernando Corridor. Further, the building has undergone major alterations (described in Topical Response 1, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR) that disqualify the building based on its architecture.

Response 4-4

The comment refers to a survey conducted by the City of the San Fernando Road Corridor Redevelopment Project area in 1996. The 1996 study indicated the 3901 building might be eligible for the National Register of Historic Places and the California Register of Historic Resources based on its association with the town of Tropico as it might “have been occupied at one time by the Tropico Town Hall.” As stated on page 4.3-19 of the Draft EIR, further research has clarified the information relied upon by the drafters of the 1996 report. In particular, the survey identified the Tropico Town Hall as being located at the 3901 building, which was incorrect. The building was constructed after the town of Tropico had been annexed to Glendale and never served as the Tropico Town Hall. As such, the building does not meet the criteria to be eligible for the National Register of Historic Places or the California Register of Historical Resources for association with historic persons or events. Further, the survey was a cursory review of the entire redevelopment project area and was not an in depth analysis of the building in question.

The comment also states that no evidence demonstrates that the building at 3901–3915 San Fernando Road has been significantly altered since the mid-1990s and the time of the survey. As described in more
detail in the Draft EIR, the 1996 survey included several inaccuracies and as a result, cannot satisfy the
criteria required of a historic survey by Public Resources Code section 5024.1(g).

Moreover, the State of California's Office of Historic Preservation considers local surveys on its website
and states:

Local surveys are planning tools which, ideally, should continue to enlarge and expand on previously
gathered information. While an existing survey over five years old can provide valuable information, it is
appropriate to update the survey to ensure that local planning and preservation decisions are based on
the most current information available.

Since the 1996 survey is nearly 20 years old, it well exceeds the five-year timeframe for current
information outlined by the state. Therefore, while the 1996 survey provides some useful background
information it cannot be considered a reliable analysis of the 3901 San Fernando building. Accordingly,
Kaplan Chen Kaplan completed a comprehensive study of the 3901 San Fernando Road building as part
of this environmental review and determined that the building is ineligible for listing at the local, state,
and national levels.

Response 4-5

Refer to Response 3-6, which addresses the one-story wing.

Response 4-6

The building at 3901 San Fernando Road does not meet the eligibility requirements for the national, state,
or local level for the reasons stated in Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 of
the Draft EIR, and Appendix F01 of the Final EIR.

Response 4-7

The comment relates to the alternatives analysis in the Draft EIR and suggests a broader range of
alternatives should be analyzed. Page 7.0-1 of the Draft EIR states “based on the State CEQA Guidelines,
several factors need to be considered in determining the range of alternatives to be analyzed in an EIR
and the level of analytical detail that should be provided for each alternative. These factors include (1) the
nature of the significant impacts of the proposed project; (2) the ability of alternatives to avoid or lessen
the significant impacts associated with the project; (3) the ability of the alternatives to meet the objectives
of the project; and (4) the feasibility of the alternatives. These factors would be unique for each project.”
Further State CEQA Guidelines Section 15126.6(a) states “an EIR need not consider every conceivable
alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that
will foster informed decision making and public participation.”
The Draft EIR states on page 7.0-4 that Alternative 2 “is being considered due to public comment letters received that suggested incorporating the existing building into the proposed project.” Alternative 2 satisfies all of the requirements for an alternative in that is potentially feasibly and meets most of the project objectives. This alternative responds to specific concerns raised during the Notice of Preparation process and provides enough information to facilitate public participation. It should also be noted that the alternatives discussion, as indicated above, focuses on those alternatives that would avoid or substantially lessen a significant impact of the proposed project. Two significant impacts were identified in the Draft EIR, construction related noise and recreation impacts. Alternative 2 is presented as the environmentally superior alternative as it would result in a smaller residential building and therefore would reduce potential noise impacts on nearby sensitive uses. Numerous other alternatives that retain the building could have been considered (e.g., maintaining the building façade, maintaining a portion of the building, etc.). However, ultimately, these alternatives would have resulted in similar effects as Alternative 2. Specifically they would have included residential units without full payment of mitigation for recreation and would result in construction related noise impacts. As such, inclusion of additional variations on Alternative 2 would not have provided any additional important information or materially changed the alternatives analysis.

The commenter states “once acknowledged as a historic resource...there needs to be a broader range of reuse/preservation alternatives.” First, the building at 3901 San Fernando Road has never been acknowledged as a historical resource, and as shown herein, the building does not qualify as an historic resource. Second the commenter does not provide additional information as to which other alternatives should have been analyzed. As stated above, CEQA does not require an exhaustive list of alternatives. The alternatives presented within the Draft EIR reflect a reasonable range of alternatives, they are adequate, and they meet the purpose of CEQA.

Response 4-8

Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2.

Response 4-9

The comment expresses support for a reuse alternative, but no specifics were provided. The comment expresses an opinion. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. However, because the comment does not raise an environmental issue, no further response is required.

Response 4-10

The comment provides summary information. See Responses 4-2 through 4-9 for responses to the comments raised in this letter.
Mr. Duong,

These comments are submitted on behalf of CARD (Citizens Advocating Rational Development) in response to the Draft EIR prepared for the Glendale Link Project. Please make sure that our comments are added to the public record.

Additionally, we are requesting that a copy of the NOD for the Glendale Link Project be sent to us (nick@rationaldev.org) when it is issued.

Thank you!
Rather Duong  
City of Glendale  
633 E. Broadway, Rm 103  
Glendale, CA 91206  

Re: Glendale Link Project - 3901-3915 San Fernando Road  

Dear Mr. Duong,  

The undersigned represents Citizens Advocating Rational Development (“CARD”), a non-profit corporation dedicated to issues in development and growth.  

This letter contains comments on the Draft Environmental Impact Report on the Glendale Link Project - 3901-3915 San Fernando Road, in accordance with CEQA and the Notice of Completion and Availability. Please ensure that these comments are made a part of the public record.  

ENERGY  

The DEIR does not discuss any requirements that the Project adopt energy saving techniques and fixtures, nor is there any discussion of potential solar energy facilities which could be located on the roofs of the Project. Under current building standards and codes which all jurisdictions have been advised to adopt, discussions of these energy uses are critical; 142 multi-family residential units; approximately 11,600 square feet of commercial floor area, 5,000 square feet of commercial studio space, 1,500 square feet of lobby/leasing area, supporting parking facilities, and recreation and open space amenities, will devour copious quantities of electrical energy, as well as other forms of energy.
WATER SUPPLY

The EIR (or DEIR – the terms are used interchangeably herein) does not adequately address the issue of water supply, which in California, is a historical environmental problem of major proportions.

What the DEIR fails to do is:

1. Document wholesale water supplies;
2. Document Project demand;
3. Determine reasonably foreseeable development scenarios, both near-term and long-term;
4. Determine the water demands necessary to serve both near-term and long-term development and project build-out.
5. Identify likely near-term and long-term water supply sources and, if necessary, alternative sources;
6. Identify the likely yields of future water from the identified sources;
7. Determine cumulative demands on the water supply system;
8. Compare both near-term and long-term demand to near-term and long-term supply options, to determine water supply sufficiency;
9. Identify the environmental impacts of developing future sources of water; and
10. Identify mitigation measures for any significant environmental impacts of developing future water supplies.
11. Discuss the effect of global warming on water supplies.

There is virtually no information in the DEIR which permits the reader to draw reasonable conclusions regarding the impact of the Project on water supply, either existing or in the future.

For the foregoing reasons, this EIR is fatally flawed.

AIR QUALITY/GREENHOUSE EMISSIONS/CLIMATE CHANGE

The EIR lacks sufficient data to either establish the extent of the problem which local emissions contribute to deteriorating air quality, greenhouse emissions or the closely related problem of global warming and climate change, despite the fact that these issues are at the forefront of scientific review
due to the catastrophic effects they will have on human life, agriculture, industry, sea level risings, and the many other serious consequences of global warming.

This portion of the EIR fails for the following reasons:

1. The DEIR does not provide any support or evidence that the Guidelines utilized in the analysis are in fact supported by substantial evidence. References to the work of others is inadequate unless the document explains in sufficient detail the manner and methodology utilized by others.

2. Climate change is known to affect rainfall and snow pack, which in turn can have substantial effects on river flows and ground water recharge. The impact thereof on the project’s projected source of water is not discussed in an acceptable manner. Instead of giving greenhouse emissions and global warming issues the short shift that it does, the EIR needs to include a comprehensive discussion of possible impacts of the emissions from this project.

3. Climate change is known to affect the frequency and or severity of air quality problems, which is not discussed adequately.

4. The cumulative effect of this project taken with other projects in the same geographical area on water supply, air quality and climate change is virtually missing from the document and the EIR is totally deficient in this regard.

For the foregoing reasons, the EIR is fatally flawed.

ALTERNATIVE ANALYSIS

The alternative analysis fails in that the entire alternatives-to-the-project section provides no discussion of the effects of the project, or the absence of the project, on surrounding land uses, and the likely increase in development that will accompany the completion of the project, nor does it discuss the deleterious effects of failing to update the project upon those same surrounding properties and the land uses which may or have occurred thereon.

Thank you for the opportunity to address these factors as they pertain to the referenced DEIR.

Very truly yours,

CITIZENS ADVOCATING RATIONAL DEVELOPMENT

NICK R. Green
President
Letter No. 5: Citizens Advocating Rational Development

Response 5-1

The comment requests a copy of the Notice of Determination upon issuance. The City will provide notice of the Final EIR in accordance with the State CEQA Guidelines. The comment also provides introductory information No further response is required.

Response 5-3

Appendix F of the State CEQA Guidelines requires that “potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project.” The proposed project is an urban infill project that would replace existing commercial development with a mixed-use project consisting of residential and commercial uses. Existing development within the project site currently generates demand for energy resources.

Project development would change the type of development present within the site and thus the energy demand generated on the site. Two structures exist on the project site – one was constructed in 1930 and the second in 1965. The proposed project would be required to comply with all applicable state and federal energy efficiency standards, including Title 24 energy requirements. As existing commercial uses on the project site were constructed under less stringent energy efficiency standards than those currently in effect, the new structures would be substantially more efficient in their energy demand than existing development. The proposed project will incorporate energy efficient features such as low flow toilets and will be required to use recycled water for landscaping. Thus, the proposed project is not expected to result in any substantial effect related to energy consumption.

Response 5-3

The Draft EIR adequately addressed the issue of water supply. The water resources that would serve the proposed project are discussed in pages 4.10.1-1 through 4.10.1-10 of the Draft EIR. As discussed in the Draft EIR, existing sources of water supply for the City consist of imported water from the Metropolitan Water District (MWD), local groundwater, and the City’s water reclamation program. The Draft EIR analyzed historic water supplies from each of these sources, and provided a description of expected future availability.

Response 5-4

Table 4.10.1-2 in the Draft EIR identifies projected water demand for each project development option based on standard water consumption rates for the types of development proposed. As shown in Table 4-10.1.2, there is sufficient water available to serve the proposed project.
Table 4.10.1-3 in the Draft EIR identifies existing and project water supply and demand for the City of Glendale. The information in this table is provided in Glendale Water and Power’s 2010 Urban Water Management Plan. Based on the cumulative development scenario defined in Table 4.0-1 of the Draft EIR, Table 4.10.1-5 identifies the projected water demand of related projects. As required by CEQA, the cumulative scenario analyzed in this table includes past, present, and reasonably foreseeable future projects.

Response 5-5

The comment indicates that the EIR fails to determine “reasonably foreseeable development scenarios, both near-term and long-term.” Chapter 3.0 Project Description includes a description of the proposed project and any potential development scenarios. As appropriate under CEQA, analysis within the EIR is limited to the development contained within the Project Description.

Response 5-6

As stated on page 4.10.1-21 of the Draft EIR, the projected total water demand of the proposed project and related projects 495.2 acre-feet per year. Table 4.10.1-3 in the Draft EIR identifies existing and projected water supply and demand for the City of Glendale. The information in this table is provided in Glendale Water and Power’s 2010 Urban Water Management Plan. Based on the cumulative development scenario defined in Table 4.0-1 of the Draft EIR, Table 4.10.1-5 identifies the projected water demand of related projects. As required by CEQA, the cumulative scenario analyzed in this table includes past, present, and reasonably foreseeable future projects.

Near- and long-term demand is compared to near- and long-term supply to form the basis of the analysis presented in Section 4.10.1 Water Service.

Response 5-7

Pages 4.10.1-1 through 4.10.1-6 of the Draft EIR identify likely near and long term water supply sources including MWD, State Water Project and Colorado River Water. The commenter is further referred to page 4.10.1-5 of the Draft EIR which includes a section titled “Future Water Supply Reliability” for a discussion of future sources of water. In addition, Table 4.10.1-3 in the Draft EIR identifies existing and projected water supply and demand for the City of Glendale. The information in this table is provided in Glendale Water and Power’s 2010 Urban Water Management Plan.

Response 5-8

Section 4.10.1 Water Service of the Draft EIR identified future yields from MWD and groundwater sources. These yields are provided on page 4.10-1-4 and 4.10.1-9.
Response 5-9

Cumulative impacts related to water supply are discussed in detail on page 4.10.1-12. As shown in Tables 4.10.1-3, 4.10.1-4, and 4.10-5 of the Draft EIR, water supplies have been identified for normal and multiple-dry-year scenarios to meet the projected demand generated by the proposed project and related projects. Thus, sufficient supplies are available and no cumulative impacts would occur.

Response 5-10

Near- and long-term demand is compared to near- and long-term supply to form the basis of the analysis presented in Section 4.10.1 Water Service. Adequate water supplies have been identified Table 4.10.1-3 (normal weather conditions) and Table 4.10.1-4 (multiple dry year) of the Draft EIR to meet demand in normal and multiple-dry-year scenarios. Thus, no additional water supplies are necessary for this project, and no additional analysis is required.

Response 5-11

The commenter states the EIR should identify the environmental impacts of developing future sources of water. As demonstrated in Section 4.10.1 Water Service, the proposed project would be served by sufficient water supplies. As such, no new or expanded water supplies would be required to serve the demand generated by the proposed project and related projects, and therefore no impacts would result from the development of new or additional water supplies. Should Glendale Water and Power elect to develop new sources of water supply in the future, environmental review of such a project would be performed at that time.

Response 5-12

As discussed above, the proposed project would not result in any environmental effects related to developing future water sources, as sufficient water sources exist to serve the proposed project. Therefore, no mitigation measures are necessary.

Response 5-13

The commenter indicates the Draft EIR should include a discussion of the effect of global warming on water supplies. Page 4.10.1-5 includes a discussion of future water supply reliability and indicates that variable weather conditions are a challenge in providing reliable and high quality water supply for Southern California.

Global climate change has the potential to result in a range of environmental effects, among which is the potential to increase the frequency and severity of droughts, which could affect the future availability of water supply throughout the state. As discussed in Responses 5-10 and 5-11, above, the Draft EIR identifies adequate water supplies to meet projected demand in a multiple-dry-year scenario,
Further, in *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, the California Superior Court held that CEQA does not require a lead agency to evaluate the potential impacts of the environment on a project. The effects of climate change on water supplies are at present uncertain, and it would be inappropriate at this time to speculate what impact such effects may have on water supplied to and by Glendale Water and Power since CEQA does not require the Lead Agency to engage in speculation about impacts. *State CEQA Guidelines*, 14 CCR Section 15145.

In sum, Section 4.10.1 Water Supply provides sufficient information to allow the reader to draw a reasonable conclusion regarding the impact of the proposed project on water supply both existing and in the future.

**Response 5-14**

As provided in **Response 5-3 through 5-12** above, the Draft EIR includes sufficient information to support the finding that no significant impact would occur on water supply as a result of the proposed project.

**Response 5-15**

The comment includes general statements regarding air quality and global climate change. The specific comments are addressed in **Responses 5-16 through 5-19**, below. The Draft EIR includes analysis of air quality and greenhouse gas emission in accordance with the CEQA Guidelines. The analysis is provided in Section 4.2 Air Quality and Section 4.5 Greenhouse Gases of the Draft EIR.

**Response 5-16**

The Draft EIR relies upon the guidelines provided by the South Coast Air Quality Management District (SCAQMD). The guidelines produced by the SCAQMD are public documents, with all supporting evidence, data, and methodologies freely available from the SCAQMD. Internet addresses for the various thresholds and studies used in the analysis are provided in the document. Section 4.2 Air Quality of the Draft EIR, specifically page 4.2-14 which includes the air quality methodology, describes the references used in the air quality analysis.

**Response 5-17**

While climate change is generally understood to affect local rainfall and snow pack levels, it is not possible to make a precise link between the emissions of any single project, including the one analyzed in the Draft EIR, on those levels. Climate change is a global issue in which emissions from sources in Asia or Africa have as much impact on rainfall in California as emissions from local sources do. In the context of
global changes in weather or climate emissions from any individual project are inconsequential. Therefore, impacts can only be considered in terms of cumulative emissions, which is what the SCAQMD significance thresholds address.

Response 5-18

Climate change may affect air quality, but only indirectly through an influence on general climate conditions and meteorology. There is no indication from the SCAQMD or the California Air Resources Board that greenhouse gas (GHG) emissions have any substantial impact on local or regional air quality. Direct impacts of the project on air quality are addressed in the document in Section 4.2 Air Quality.

Response 5-19

The Draft EIR adequately analyzed the proposed project’s cumulative water supply, air quality and climate change impacts in Section 4.2 Air Quality and 4.5 Greenhouse Gases on pages 2.2-25 and 4.5-26 respectively. Refer to Response 5-10 and 5-11, above, regarding the proposed project's cumulative water supply analysis.

Air quality and climate change impacts are by nature cumulative. The SCAQMD specifically states that projects that are below significance thresholds are not cumulatively significant. As stated on page 4.2-25 of the Draft EIR, individual projects that exceed the SCAQMD-recommended daily thresholds for project-specific impacts would be considered to cause a cumulatively considerable increase in emissions for those pollutants for which the air basin is in nonattainment. As construction of the project would not exceed SCAQMD thresholds, the project would not contribute to a cumulatively considerable increase in emissions.

As stated on page 4.5-26 of the Draft EIR, GHG emissions do not have a localized impact are by their nature cumulative. While the thresholds are applied to individual projects, they also serve as cumulative impact thresholds and the analysis presented in the Draft EIR leads to a conclusion that the project’s contribution to cumulative impacts is less than significant.

Response 5-20

This comment expresses an opinion. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. Refer to Responses 5-2 through 5-19 regarding why the Draft EIR is not fatally flawed.

Response 5-21

Section 7.0, Alternatives, of the Draft EIR, identifies feasible alternatives to the proposed project that may reduce the significant impacts identified for the project, as required by Section 15126.6 of the State CEQA
Guidelines. Chapter 7.0 of the Draft EIR includes a discussion of alternatives to the proposed project. Each alternative is evaluated according to the topic areas addressed in the Draft EIR including land use. As stated in Chapter 7.0, none of the alternatives evaluated would result in additional land use impacts compared to the proposed project.

The potential growth-inducing impacts of the proposed project are discussed in Section 6.0, Growth Inducement, of the Draft EIR. The proposed project would not result in any growth-inducing impacts. The proposed project site is located in a developed area of the City of Glendale, and would not remove an impediment to growth for any nearby property by extending service infrastructure to a currently unserved area, cause substantial economic growth, or establish a precedent that would result in unplanned growth in the area.
Duong, Rathar

From: Diane Lewis [rubydeelewis@gmail.com]
Sent: Monday, October 07, 2013 5:41 PM
To: Duong, Rathar
Subject: 3901 San Fernando Rd.

Dear Mr. Duong,

I am horrified to learn that this building is slated to be demolished only to be replaced by yet another ugly, architecturally undistinguished development. This is city planning at its worst, and the southern part of the city was very nearly destroyed in the 1970s when so many beautiful homes were replaced by stucco boxes which are now falling apart and which put this part of the city in danger of becoming a slum. Please don't make the same mistake with this building at 3901 San Fernando Rd. Please use the option of incorporating the building into the proposed development.

Sincerely,
Diane Lewis
1408 E. Garfield Ave., 91205

Sent from my iPad
3.0 Comment Letters and Responses

Letter No. 6: Diane Lewis
Response 6-1

The comment appears to express support for Alternative 2. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2.
Duong, Rathar

From: Randall Bloomberg [rvbloomberg@gmail.com]
Sent: Monday, October 07, 2013 5:42 PM
To: Duong, Rathar
Subject: 3901 San Fernando

Dear R. Duong,

I have been a home owner and resident of Glendale for the past six years.

I drive pass 3901 San Fernando Road nearly everyday. Long before it was slated for demolition, I admired it as a beautiful building. Its character adds an enormous quality to the streetscape. It would be a horrible mistake to allow developers to tear it down and build just another pack-em-in non-descript building.

HOW HARD IS IT TO REPURPOSE THE EXISTING STRUCTURE AND INCORPORATE IT INTO ANOTHER BUILDING?? COME ON, DON'T LET BIG MONEY DEVELOPERS DESTROY THE CHARACTER AND HISTORY OF OUR COMMUNITY!!!!

This would not happen in Pasadena. That city is "cool" because they understand the value (aesthetic and monetary) of historic architecture.

If you want to promote bland in Glendale, than go ahead and knock it down. Once it is gone we will be that much closer to being anywhere (nowhere) USA.

Please support alternative 2-Reuse/Reduce Density Alternative for the Glendale Link Project.

In the long run preserving this building will be worth a heck of a lot more because it will attract more highly educated and upscale tenants and businesses to the area, that I am sure the developers and the city is after.

Thank you!

Randall Von Bloomberg
concerned citizen

10/8/2013
Letter No. 7: Randall Bloomberg

Response 7-1

The comment expresses support for Alternative 2. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2.
Duong, Rathar

From: Ely Lester [elyester@gmail.com]
Sent: Monday, October 07, 2013 5:57 PM
To: Duong, Rathar
Subject: 3901 San Fernando Rd

Dear Mr. Duong,

I am writing to express my support for the preservation of the commercial building located at 3901 San Fernando Rd. Post WW2 planning and development mistakes have left us with precious little of the old urban fabric in Glendale. This is the type of building that should be reused/repurposed, not demolished! The cities and neighborhoods that bound Glendale are all attracting more creative young people, partly because so many value the beauty and sense of place that old buildings create. It is vital that city officials understand this. Please keep 3901 San Fernando intact!

Thank you,
Ely Lester

1411 Hillcrest Ave.
Glendale CA.

10/8/2013
Letter No. 8: Ely Lester

Response 8-1

The comment appears to express support for Alternative 2. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2.
Duong, Rathar

From: Carolyn West [mjpcomacho@yahoo.com]
Sent: Monday, October 07, 2013 6:03 PM
To: Duong, Rathar
Subject: RE: 3901 San Fernando Rd.

We object strenuously to proposed demolition of building located at 3901 San Fernando Road. We want to have it put onto both Glendale and California lists of historic properties. Glendale has such a limited number of historic structures. We can't afford to lose this beautiful property.

Signed: Carolyn West and David Petzold
1621 Rancho Avenue
Glendale, CA 91201

10/8/2013
Letter No. 9: Carolyn West

Response 9-1

The comment expresses an opinion that the building at 3901 San Fernando Road should be placed on both the Glendale and California registers of historic properties. Refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR regarding the eligibility of the building for listing on the local, state, or national register.
Duong, Rathar

From: Judy Bruce [judithobruce@gmail.com]
Sent: Monday, October 07, 2013 8:33 PM
To: Duong, Rathar
Subject: Please preserve the building at 3901 San Fernando

Glendale has a beautiful mix of vintage architecture. It would be a shame to destroy that which gives Glendale its character and its historic presence.

Sent from my iPad
Letter No. 10: Judy Bruce

Response 10-1

The comment appears to express an opinion regarding the architecture of the 3901 San Fernando Road building and requests that the building be preserved. Please refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR for a discussion of the architectural integrity of the building. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2, which is the preservation alternative. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
Duong, Rathar

From: Warensniec@aol.com
Sent: Monday, October 07, 2013 9:39 PM
To: Duong, Rathar
Subject: Please spare 3901 San Fernando Rd

Glendale has been losing historic structures that should at least be integrated into adaptive reuse proposals. Please support sparing the 1930 Mediterranean Revival style structure.

Thank you,
The Linkchorst Family,
La Crescenta, CA

10/8/2013
Letter No. 11. Linkchorst

Response 11-1

The comment expresses an opinion supporting the adaptive reuse of the 3901 San Fernando Road building. Please refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. Also refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of a reuse alternative. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
Duong, Rathar

From: Joemy Wilson [joemytd@aol.com]
Sent: Tuesday, October 08, 2013 9:38 AM
To: Duong, Rathar
Cc: tghs@glendalehistorical.org
Subject: Glendale Link project

Dear Mr. Duong,

As a member of the Glendale Historical Society, I am writing to urge you to consider Alternative 2 - Reduced Density/Reuse Alternative for the Glendale Link Project - to preserve the delightful and historic structure at 3901 San Fernando Road. It's a distinctive Mediterranean Revival building and one of the few commercial buildings in that style remaining in Glendale. It has historical significance as well, as it was the headquarters of L.H. Wilson (no relation) as he was developing the San Fernando corridor.

Alternative 2 is a win-win situation: it meets the developer's goals and preserves a piece of our city's heritage. I hope you will consider this alternative to destroying yet another charming piece of old Glendale.

Sincerely,

Joemy Wilson
Glendale homeowner since 1986
Letter No. 12. Joemy Wilson

Response 12-1

The comment expresses an opinion in favor of Alternative 2. Please refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of this alternative. Please also refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR regarding the building's connection to L.H. Wilson and the development of the San Fernando Corridor. The opinions of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
Duong, Rathar

From: Cathy Green [CathyG@CmcPenPro.com]
Sent: Tuesday, October 08, 2013 7:47 AM
To: Duong, Rathar
Subject: Glendale Link Project

Mr. Duong I am e mailing you to show my support for the Alternative 2-Reduced Density/Reuse Alternative for the Glendale Link Project. One of the things that makes Glendale special is its historic structures be they homes or commercial buildings. It would be a shame to lose another such structure when there is a viable alternative that would save the structure at 3901 San Fernando Road and still provide for the development needed. So please do not allow this structure to be torn down! Respectfully Cathy Green (home owner and business owner)

Cathy Green, CPC, ERPA

647 W. Broadway
Glendale, CA 91204

Tel: (818) 247-7900 x.102
Fax: (818) 247-7277

www.cmcpenpro.com

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10/8/2013
Letter No. 13: Cathy Green

Response 13-1

The comment expresses an opinion supporting the adaptive reuse of the 3901 San Fernando Road building. Please refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. Also refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of a reuse alternative. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
From: Sam Manoukian [mailto:remaxglendale@msn.com]
Sent: Tuesday, October 08, 2013 9:23 PM
To: Duong, Rathar
Subject: Link Project

I am a long time resident, civic community member, and a business owner in the City of Glendale. South Glendale, is very much in need of revitalization. This time the tax payers are not coughing up the bill. Careful and well thought zoning and planning have encouraged the developer to propose a first class project. The proximity of this project to the metro link station. (a few hundred yards away), the fact that a resident can hop on the beeline adjacent to the project and be anywhere in the city, make this a very desirable project.

I care about the history of the city, and historical buildings in the city. However, as demonstrated by the DEIR this is not a historical building. It may be old, but it has no historical significance. The numerous alterations to the building over time, and the monstrosity on the roof. (gigantic billboard) are enough to disqualify this building.

I support the demolition of the existing buildings and the construction of the proposed, beautiful, 142 unit mixed use project at the gateway to Glendale.

Sam S. Manoukian, CCIM
#1 COMMERCIAL RE/MAX AGENT IN THE WORLD
RE/MAX OPTIMA-Director of Commercial Division
333 E. Glenoaks Blvd. Suite 100, Glendale, CA 91207
Dir: 818-547-6324 Fax: 818-450-0712
Email: remaxglendale@msn.com
www.glendaleinvestments.com
OVER $1BILLION IN CLOSED TRANSACTIONS
Letter No. 14: Sam Manoukian
Response 14-1

The comment includes statements in support of the proposed project and the Draft EIR's determination that the building at 3901 San Fernando Road is not an historic resource. The comment will be forwarded to the decision maker prior to taking action on the proposed project.
From: Alexander Sardarian [mailto:alsard@gmail.com]
Sent: Tuesday, October 08, 2013 7:20 PM
To: Duong, Rathar
Subject: Comment on DRAFT EIR / Link Project

I have been a resident of Glendale for many years and my business is located on San Fernando Rd., at the Chevy Chase intersection. I am in South Glendale every day. I am so pleased to see a quality development in this part of the city. I travel to Silverlake, Atwater or downtown Glendale for lunch and am envious of these communities. The mixed use development will result in quality business establishments to support the South Glendale business community.

The Link, will replace yet another eye soar on San Fernando Rd. A gateway to the city is befitting of a beautiful project. Glad to see the old building with the billboard on top go.

I reviewed the DEIR on your website. The consultants and experts have done a great job. I completely support the demolition of the existing buildings and the construction of the beautiful 142 unit mixed use project.

Alexander Sardarian
Letter No. 15: Alexander Sardarian

Response 15-1

The comment includes statements in support of the proposed project. The comment will be forwarded to the decision maker prior to taking action on the proposed project.
From: David Alishan [mailto:carwshpro@hotmail.com]
Sent: Tuesday, October 08, 2013 3:10 PM
To: Duong, Rathar
Subject: Glendale Link Project

I am writing this email in support of the Glendale Link Project. I have been a Glendale resident for many years. Unlike many people that will comment on this project, I live in South Glendale. This part of the city has been neglected for many years and finally we are seeing quality developments. I believe that the building that is going to be demolished has far exceeded its life and with that huge billboard on top, is a blight to the neighborhood. The addition of the low income units in the project is going to tremendously help people in this city that are in need of low income housing at no cost to the city. I know that the city has been trying to get rid of the billboards in the city for a long time. This particular ugly billboard and the shabby looking building will finally be replaced with a beautiful project. We should all be greatfull to the developer who has trust and belief in South Glendale. The North Glendale people who oppose this project probably never travel south of Colorado to have seen this building.

Thanks
David Alishan
1905 vassar street
Glendale 91204
Letter No. 16: David Alishan

Response 16-1

The comment includes statements in support of the proposed project. The comment will be forwarded to the decision maker prior to taking action on the proposed project.
From: John Ballon [mailto:bonjallon@gmail.com]
Sent: Tuesday, October 08, 2013 10:18 AM
To: Duong, Rathar
Subject: Please Help Preserve 3901 San Fernando

Dear Rathar Duong,

I am a Glendale resident who moved to the city two years ago because of its well preserved historic housing stock. I live in a 1930 Spanish house in the Verdugo Woodlands. Many of my friends are moving to the area because of its historic charm. It is important to me and many other residents that the feel of the city is preserved.

I am emailing you because I support an alternative use for the Glendale Link Project that preserves the lovely, rare and historically significant Mediterranean Revival structure on San Fernando road. The city should embrace Alternative 2-Reuse/Reduced density for the Glendale Link Project, which I believe sufficiently meets the developer's overall goals while still allowing for the adaptive reuse of the building in a way that preserves it.

The building has historic associations with an early developer in the SFV, L.H. Wilson. It is also, as mentioned earlier, architecturally significant. The city of Glendale has allowed too many important and historically significant structures to be torn down. If you look at the Glendale neighborhoods where the homes sell for the most money, you will notice that these are the same neighborhoods where well preserved historic houses are clustered. The city's interests are best served in preserving the historic charm. We cannot afford to lose any more important structures.

Thank you kindly,

John Ballon
Glendale Resident
Letter No. 17: John Ballon

Response 17-1

The comment expresses an opinion in favor of Alternative 2. Please refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of this alternative.

Response 17-2

The comment expresses an opinion on the importance of L.H. Wilson and the architectural integrity of the building. Please refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR regarding the building's connection to L.H. Wilson, the development of the San Fernando Corridor and the architectural integrity of the building. The opinions of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
From: Matteo Bitetti [mailto:matteobitetti@icloud.com]
Sent: Wednesday, October 09, 2013 5:39 PM
To: Duong, Rathar
Subject: Re: Preserve -- repurpose

3901 San Fernando Road
Hopper's Office Furniture Building

On Oct 9, 2013, at 5:35 PM, "Duong, Rathar" <RDuong@ci.glendale.ca.us> wrote:

> Hi Matteo. Which project are you referencing? Thanks
> > Rathar
> >>
> >> -----Original Message-----
> > From: Matteo Bitetti [mailto:matteobitetti@icloud.com]
> > Sent: Wednesday, October 09, 2013 5:32 PM
> > To: Duong, Rathar
> > Subject: Preserve -- repurpose
> > >
> > Please do not tear down our city's landmarks.
> > >
Letter No. 18: Matteo Bitetti

Response 18-1

The comment expresses an opinion opposed to the proposed project and in support of the adaptive reuse of the 3901 San Fernando Road building. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of a reuse alternative. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
CIMMARUSTI HOLDINGS, LLC

October 9, 2013

We have been residents of Glendale for many years. We are finally pleased to see quality developments in South Glendale.

The Link Project will replace an unsightly building and billboard located at the gateway to the City.

No doubt some may argue that the building is historical, but the same people argued that the buildings situated in the present Americana At Brand were also historical. This single issue advocacy group has not had, and does not have, the interests of the entire community in mind. The existing building is nothing but an old altered building beyond recognition.

We have reviewed the DEIR on your website and we are in agreement with the conclusions reached. We unequivocally support the demolition of the existing buildings and the construction of the beautiful 142 unit mixed use project.

Lawrence P. Cimmarusti

Ralph J. Cimmarusti
Letter No. 19: Lawerence Cimmarusti

Response 19-1

The comment includes statements in support of the proposed project and the Draft EIR’s determination that the building at 3901 San Fernando Road is not an historic resource. The comment will be forwarded to the decision maker prior to taking action on the proposed project.
I am a long time resident of Glendale and my business is located on San Fernando Rd. I am literally in South Glendale on a daily basis. A quality development like The Link is very much needed in this part of the city. My partner and I travel to Silverlake, Atwater or downtown Glendale for lunch. These communities have restaurants, coffee houses and services that are much needed in South Glendale. The Link will result in quality business establishments to support the South Glendale business community.

San Fernando and Central is a gateway to the city. The buildings and the billboard the Link will replace should have been demolished years ago for a quality project.

I have examined the DEIR on your website. The experts have prepared a thorough document in support of the project. I support the demolition of the existing buildings and the construction of the beautiful 142 unit mixed use project.

Pierre Chraghchian
Letter No. 20: Pierre Chraghchian
Response 20-1

The comment includes statements in support of the proposed project. The comment will be forwarded to
the decision maker prior to taking action on the proposed project.
I have been a resident of Glendale and have had a law practice in Glendale for many years. A quality development in South Glendale is a long time coming. The Link Project, with its proximity to the metrolink station and bus transportation is what every city desires. I am pleased that the existing buildings will be demolished, because they really have made that area of south Glendale unsightly than the remainder.

Being an attorney, I have carefully reviewed the DEIR on your website. I can’t wait to see another beautiful building across the street from the Camden mixed use project. Glad that the gigantic billboard and the ugly building will disappear. Moreover, badly needed low income housing will be added to the city supply at no cost to the taxpayers.

This 142 unit mixed use project has my complete support.

Ara Aroustamian, Esq.
Aroustamian & Associates
100 W Broadway, Suite 540
Glendale, CA 91210
Tel: (818) 247-4700
Fax: (818) 247-4710

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Letter No. 21: Ara Aroustamian

Response 21-1

The comment includes statements in support of the proposed project. The comment will be forwarded to the decision maker prior to taking action on the proposed project.
Don't tear it down, it's an old historical commercial building. Glendale has done a good job of preserving historical homes but not commercial buildings. Which is why Old Town in Pasadena is gorgeous and charming and Brand Blvd. in Glendale is essentially a shit box. Thanks, Ellen Svaco

Sent from my iPhone
Letter No. 22: Ellen Svaco

Response 22-1

The comment expresses an opinion opposed to the proposed project. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of a reuse alternative. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
Sir:
Please do not let them tear down the lovely old 30s building on San Fernando Rd (3901). It is part of Glendale's history and should be preserved.
Thank you.
Nancy Bain
Letter No. 23.  Nancy Bain

Response 23-1

The comment expresses an opinion opposed to the proposed project. Please refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR regarding the architectural integrity of the building. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of a reuse alternative. The comment will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
Dear Mr. Duong:

I am one of many, many Glendale residents who are very concerned about the rapid loss of our architectural heritage to development. The building at 3901 San Fernando Road is one of the few remaining commercial buildings from that period in Glendale's history and I don't understand why it cannot be preserved and incorporated in any future development of the property. Once it is gone, it is gone forever. This is a scenario that has been repeated over and over again to the point where very little of Glendale's architectural history is left from that period. The original owner and his connection to the evolution of San Fernando Road as a commercial center is important to understanding how the city developed. Please find a way that this piece of our history can be preserved!

Sincerely yours,

Bruce Merritt

Bruce G. Merritt
brucegmerritt@sbcglobal.net
1700 Melwood Drive
Glendale, CA 91207
tel. 818-521-1812
3.0 Comment Letters and Responses

Letter No. 24: Bruce Merritt

Response 24-1

The comment expresses an opinion regarding the 3901 San Fernando Road building. Please refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR regarding the building’s connection to L.H. Wilson, the development of the San Fernando Corridor and the architectural integrity of the building. Also refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of a reuse alternative. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
Hello,

So Glendale is considering tearing down another historic building? Seriously? Can we not look at the success Pasadena has with preserving their heritage and preserve the rich history of Glendale?

- The city should pursue Alternative 2-Reuse/Reduced Density Alternative for the Glendale Link Project, which meets the developer's goals while allowing for preservation and adaptive reuse of the building.
- The existing structure is a rare example of Mediterranean Revival commercial architecture in Glendale.
- The building's association with L.H. Wilson, a leading advocate for the development of the city should pursue Alternative 2-Reuse/Reduced Density Alternative for the Glendale Link Project, which meets the developer's goals while allowing for preservation and adaptive reuse of the building.
- The existing structure is a rare example of Mediterranean Revival commercial architecture in Glendale.
- The building's association with L.H. Wilson, a leading advocate for the development of the San Fernando commercial corridor, makes it historically as well as architecturally significant.
- The city of Glendale has an unfortunate history of allowing demolition of potentially historic structures. We cannot afford to lose any more.
- San Fernando commercial corridor, makes it historically as well as architecturally significant.

Are we really going to allow a piece of Glendale History be destroyed?

Sue Flocco
Letter No. 25: Sue Flocco

Response 25-1

The comment expresses general opinions and does not raise an environmental issue within the context of CEQA. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 25-2

The comment expresses an opinion in support of Alternative 2. Please refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2.

Response 25-3

Refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR regarding the architecture of the building. As stated in Topical Response 1, the building at 3901 San Fernando Road is not a good example of a Mediterranean Spanish Colonial Revival style building. The building was constructed at the end of the period when Mediterranean style was popular and when the design philosophy for industrial buildings had moved on to modern designs employing new 20th century materials. The building has undergone major alterations including the loss of its prominent central tower and most windows and doors. As a result, the original design has been significantly degraded and a majority of the building’s original historic fabric has been removed.

Response 25-4

The comment refers to L.H. Wilson and also expresses support for Alternative 2. Please refer to Topical Response 1 Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR regarding the building’s connection to L.H. Wilson, and Topical Response 2 and Appendix F02 to the Final EIR regarding the infeasibility of Alternative 2.

Response 25-5

Refer to Response 25-3.

Response 25-6

The comment expresses an opinion opposing the demolition of the building, but does not raise an environmental issue within the context of CEQA. The Draft EIR correctly determined that the building at 3901 San Fernando Road is not an historic resource. Refer to Response 25-3 for more information. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
Response 25-7

Please refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR regarding the alleged significance of the 3901 San Fernando Road building, including its connection to the development of the San Fernando Corridor and the architectural integrity of the building. The comment further expresses an opinion opposing the demolition of the building. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
3901 San Fernando, built in 1930 is a distinctive example of Mediterranean Revival architecture and is one of the few remaining commercial structures of that style left in Glendale. It is historically important for its association with L.H. Wilson, who built the structure and maintained his offices there. Wilson was a real estate agent and civic leader who was a leading proponent and facilitator of the creation of the San Fernando Road commercial corridor as we know it today.

Some options for the city are:

- The city should pursue Alternative 2-Reuse/Reduced Density Alternative for the Glendale Link Project, which meets the developer's goals while allowing for preservation and adaptive reuse of the building.
- The existing structure is a rare example of Mediterranean Revival commercial architecture in Glendale.
- The building's association with L.H. Wilson, a leading advocate for the development of the San Fernando commercial corridor, makes it historically as well as architecturally significant.
- The city of Glendale has an unfortunate history of allowing demolition of potentially historic structures.

We cannot afford to lose any more.

Tom Jacobsmeier,
1135 Geneva St
Glendale, CA 91207
3.0 Comment Letters and Responses

Letter No. 26: Tom Jacobsmeyer

Response 26-1

Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR regarding the building’s connection to L.H. Wilson, the development of the San Fernando Corridor and the architectural integrity of the building.

Response 26-2

The comment expresses an opinion in support of Alternative 2. Please refer to **Topical Response 2** and **Appendix F02** to the Final EIR regarding the feasibility of Alternative 2.

Response 26-3

Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR regarding the building’s architectural integrity. As stated in **Topical Response 1**, the building at 3901 San Fernando Road is not a good example of a Mediterranean Spanish Colonial Revival style building. The building was constructed at the end of the period when Mediterranean style was popular and when the design philosophy for industrial buildings had moved on to modern designs employing new 20th century materials. The building has undergone major alterations including the loss of its prominent central tower and most windows and doors. As a result, the original design has been significantly degraded and a majority of the building’s original historic fabric has been removed.

Response 26-4

The comment states the buildings’ association with L.H. Wilson makes it historically and architecturally significant. Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR regarding the building’s connection to L.H. Wilson and the development of the San Fernando Corridor.

Response 26-5

The comment expresses an opinion opposing the demolition of the building, but does not raise an environmental issue within the context of CEQA. The Draft EIR correctly determined that the building at 3901 San Fernando Road is not an historic resource. Refer to **Response 25-3** for more information. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
To Whom it may concern:

I am a resident of Glendale and have been for the past 8 years. I believe this High Quality Mixed Use Project will benefit the Community of Glendale and add new Quality apartment units for its citizens and for new people looking to move into the City.

Also the mixed use area along with the Studio space will provide jobs and commerce along the San Fernando Road corridor.

I especially like the location being close to the Transit Center. The Residents and Business employees will be able to use Public Transportation to go throughout the city of Glendale and Metro Link will allow them to reach destinations close and far.

The new LINK Project will beautify this GATEWAY location of South Glendale. To put it mildly, the existing building and billboard are not up to par, at all.

I also appreciate the fact that this Project will bring new Jobs and new Residents that will eat, shop and spend their money at the existing businesses in town.

Since the city is in the middle of a budget crisis, the park and additional fees in the millions of dollars generated from this project will be of great benefit to the city as well.

This is an important Project for our City and it has my complete and unequivocal support as I would like to see it become a reality.

Best,

---Alex Avakian
Letter No. 27: Alex Avakian

Response 27-1

The comment includes statements in support of the proposed project. The comment will be forwarded to the decision maker prior to taking action on the proposed project.
I'd like to register my preference that the building at 3901 San Fernando Road NOT be demolished, and that its architectural and historic character be retained. I've always admired that building, and we must do what we can to preserve the visual and aesthetic character of our city.

Thank you,

-Paul Berolzheimer

Glendale 91205
818-331-8514
Letter No. 28: Paul Berolzheimer

Response 28-1

The comment expresses an opinion supporting preservation of the 3901 San Fernando Road building. Please refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. Also refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of a reuse alternative. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
Hello sir,

Enclose please find the support letter for this project.

You can call me, if you have any questions.

Albert Babayan
Real Estate People, Inc.
Tel: (818)409-0050
Cell (818)469-9388
Fax:(818)507-8988
Email: albert@thecondopeople.com
10/11/2013

To Whom It May Concern,

I have been a real estate broker and a resident of Glendale for many years. It is great to see a project of this magnitude come to south Glendale, where there has been a lack of decent development for as long as I have lived in Glendale.

The existing buildings no longer fit in this area due to the extensive planning and rezoning undertaken by the city staff and approved by the city council. After looking at the DEIR, I believe that all the buildings on the property need to be demolished in order to have uniform development.

The Link Project with be for south Glendale what Americana has been for Brand Boulevard.

Albert Babayan
Real Estate People, Inc.
(818)409-0050 x 301
3.0 Comment Letters and Responses

Letter No. 29: Albert Babayan
Response 29-1

The comment includes statements in support of the proposed project. The comment will be forwarded to the decision maker prior to taking action on the proposed project.
Dear Rather,

This email is in OPPOSITION to the demolition of the historic and architecturally significant building located at 3901 San Fernando, known at the Glendale Link Project.

My family lives within walking distance of this beautiful building and have often admired it. We ask that you not let this developer destroy one of the few reamining commercial buildings in our neighborhood that not only ties us with our past, but brings a unique quality to our neighborhood that new construction cannot. I cannot believe that Glendale would even consider trashing one its crown jewels.

On Monday, October 11, 2013 this building was featured on the TV show Undercover Boss. The developer obviously knows that unique character and beauty of this building has value, as did the TV producer.

I DO SUPPORT Alternative 2 the Reduced Density/Reuse Alternative as it would no only save this stunning building, but give the new project some class and pizzaz. Please preserve the quality of life in our neighborhood and do not let the developer demolish this building.

Thank you for your considereation

Marty Bracciotti
318 Roads End Street
Glendale, CA 91205
cell (213) 894-1633
Letter No. 30: Marty Bracciotti

Response 30-1

The comment expresses an opinion opposed to the proposed project. Please refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 30-2

Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2.
Hello there - I am a lifelong resident of Los Angeles, and moved to Glendale last November (2012).

One of the things that I love about Glendale it the feel of early California and one of the things that drew me away from my long time home in Hollywood was the over abundance of new development.

Please do not allow for the Demolition of the wonderful Spanish storefront building on San Fernando Road. There is no reason why this great piece of architecture can’t be incorporated into the new development.

Please, please, please vote in support of saving this structure!

Kama Hayes
515 E. Chestnut Street
Glendale, CA 91205

Kama Hayes
Art Department Coordinator
UROK Productions
(213) 534-3825 (tel)
(213) 534-3884 (fax)
Letter No. 31: Kama Hayes
Response 31-1

The comment expresses an opinion opposed to the proposed project. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of a reuse alternative. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
From: Rima G. Cameron [mailto:rimag@charter.net]
Sent: Friday, October 11, 2013 3:39 PM
To: Duong, Rathar
Subject: 3901 San Fernando Rd

I am writing to express my strong opposition to the proposed demolition of the building located at 3901 San Fernando Rd. As a member of the Glendale Historical Society and the owner of home #84 on the Glendale Register of Historic Resources, I appreciate deeply the importance of maintaining Glendale’s historic treasures. The building in question is a marvelous 1930 Mediterranean Revival and has been determined to be eligible for listing on the California and the Glendale Registers of Historic Resources. I urge you to oppose the demolition and instead approve the preservation alternative identified in the Draft of the Environmental Impact Report that retains the existing building with a smaller-scale project.

Thank you for your consideration of my comments.

Rima Gregorian Cameron
Letter No. 32: Rima Cameron

Response 32-1

The comment expresses an opinion opposed to the proposed project. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 32-2

The commenter expresses an opinion on the architecture of the building and its eligibility for listing on the California and National Registers. Please refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. As stated therein, the building at 3901 San Fernando Road has been determined to be ineligible for the local, state, and national historic registers.

Response 32-3

The comment expresses an opinion in support of Alternative 2. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of a reuse alternative. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
To whom it may concern:

I have been a resident of Glendale and have had an accounting practice in Glendale for many years. I am so glad that a quality development is being proposed in south Glendale.

The DEIR on your website, was very comprehensive. No doubt the historical society of Glendale will oppose this project. However, they seem to think any old building in Glendale is historical. I have been to the furniture shop located in the building on many occasions. That building has no historical value. It is an old dilapidated building. I am glad that the experts agree with me.

I can’t wait to see a new state of the art building replace the existing buildings located at the gateway to Glendale...

Sincerely,

Janet Harootun, CPA
520 N Central Ave. Suite 650
Glendale CA 91203
Tel: 818-502-4900 fax 818-502-4903
website: www.jharootuncpa.com

Circular 230 Notification - IRS regulations require us to advise you that, unless otherwise specially noted, any federal tax advice in this communication (including any attachments) was not intended or written to be used, and it cannot be used, by any taxpayer for the purpose of avoiding penalties; furthermore, this communication was not intended or written to support the promotion or marketing of any of the transactions or matters it addresses.

* The information in this transmittal (including attachments, if any) is privileged and confidential and is intended only for the recipient(s) listed above. Any review, use, disclosure, distribution or copying of this transmittal is prohibited except by or on behalf of the recipient.

If you have received this transmittal in error, please notify me immediately by reply email and destroy all copies.
Letter No. 33: Janet Harootun

Response 33-1

The comment includes statements in support of the proposed project and the Draft EIR's determination that the building at 3901 San Fernando Road is not an historic resource. The comment will be forwarded to the decision maker prior to taking action on the proposed project.
I am writing this letter to support of the Glendale Link Project. I travel up and down San Fernando Rd on many occasions. I am so happy that the ugly building with a billboard on top will be demolished and will be replaced with a beautiful mixed use project. The addition of the low-income units as part of the project will benefit the needy in this city at no additional cost to the taxpayers. I am glad that someone has finally taken steps to replace that building and billboard.

Sincerely,
Gilda

Sent from my iPhone
Letter No. 34: Gilda Killeen

Response 34-1

The comment includes statements in support of the proposed project. The comment will be forwarded to the decision maker prior to taking action on the proposed project.
Good day!
I really like the Link project, the vibrant colors will bring life to this dreary part of Glendale, and will replace the bleak looking building and mega billboard located on top of it. The existing building may have looked good during the time it was constructed, however, now it does not fit in this neighborhood. It is absolutely characterless. A mishmash. Composition roof, where once there was clay, black aluminum window frames and doors that were recently installed, parapets to block the air conditioning units on top of the building.
The DEIR does a great job. I don't like alternative 2 in the EIR. I think by constructing a new building next to this old building. The old building is going to seem uglier and more out of place than it already is. I support the demolition of the existing buildings, and the construction of the Link.

Tatiana Eremina,
resident of Glendale
Letter No. 35: Tatiana Eremima

Response 35-1

The comment includes statements in support of the proposed project and in opposition to Alternative 2. The comment will be forwarded to the decision maker prior to taking action on the proposed project.
From: Janine mass [mailto:janinemass123@gmail.com]
Sent: Friday, October 11, 2013 12:07 PM
To: Duong, Rathar
Subject: City of Glendale

I am a long time resident of Glendale and am so pleased to see this beautiful proposed developments in South Glendale.

With all the development concentrated in north Glendale it is important to finally tie the two sides of the city together. I like the name Link. The city of Tropico where this project is located used to be called the link city, because it tied Los Angeles to Glendale. These developments in south Glendale will once again tie Atwater, and Silver Lake to Glendale.

To those that may argue that the existing building is historical, I would point out the Americana project which they also opposed. Look at the numerous benefits it has brought for our community.

The existing building is an old building, and there is absolutely nothing historical about it. They use term historical as loosely as possible so that it will fit their goals.

The DEIR is an excellent document. Lets make Glendale a great city for the next generation. Progress is made through action and not inaction. Lets tear down and build quality projects and housing.

--

Respectfully,

Janin Massoomian
Insurance Specialist
CA License # 0728798
Tel: 818. 645-6744
Fax: 877.494.5085
Email: Insurancechoice4u@gmail.com
3.0 Comment Letters and Responses

Letter No. 36: Janin Massoomian

Response 36-1

The comment includes statements in support of the proposed project and the Draft EIR’s determination that the building at 3901 San Fernando Road is not an historic resource. The comment will be forwarded to the decision maker prior to taking action on the proposed project.
From: Denise Walker [mailto:denisewalker3@yahoo.com]
Sent: Friday, October 11, 2013 10:46 AM
To: Duong, Rathar
Subject: Glendale Link Project

I am in favor of finding an alternative to the Glendale Link Project that preserves the building at 3901 San Fernando Road.

I have lived in Glendale for 42 years. My Mediterranean-style home was built in 1925, and has beautiful details. I am very proud of how I have maintained its original character. When I travel elsewhere, I'm always impressed by the way other cities and countries re-purpose their old buildings to maintain the charm and character of the old buildings. I hate to see historical buildings demolished, if at all possible. New construction seldom has the appeal of the old buildings.

Please do the right thing and find a way to incorporate the existing structure into the development proposed for the site.

Thank you,
Denise Walker
Glendale 91207
Letter No. 37: Denise Walker

Response 37-1

The comment expresses an opinion in support of a reuse alternative. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of a reuse alternative. Please refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
From: Duong, Rathar <RDuong@ci.glendale.ca.us>  
Sent: Friday, October 11, 2013 12:01 PM  
To: Jessica Kirchner Flores  
Cc: Rodney Khan; George Garikian  
Subject: Comment on DRAFT EIR /3901 San Fernando Blvd is an important part of Glendale's history and our city's identity

From: Russell Harnden [mailto:anitarinaldi@pacbell.net]  
Sent: Friday, October 11, 2013 12:18 AM  
To: Duong, Rathar  
Subject: 3901 San Fernando Blvd is an important part of Glendale's history and our city's identity

Dear Mr. Duong,

I am a resident of Glendale who is very interested in preserving Glendale's rich history. Historic buildings provide us and future generations a wonderful opportunity to explore the history of our "Jewel City". Glendale has already removed so much of it's historic commercial buildings and we have very few left to enjoy and study. The historic building at 3901 San Fernando Rd. is a beautiful piece of 1930's Mediterranean Revival architecture and housed a very important business which helped create the San Fernando corridor making Glendale the proud city we know today. Please consider Alternative 2 which would allow the building to remain completely intact, but repurposed for contemporary usage. This action will create a win win outcome for us all and a beautiful piece of Glendale's history will be preserved for generations to come.

Thank you for your consideration, and your support for city of Glendale's rich history.

Anita Rinaldi-Harnden
Letter No. 38: Anita Rinaldi-Harnden

Response 38-1

The comment expresses an opinion but does not raise an issue within the context of CEQA. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 38-2

Please refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR regarding the building’s connection to L.H. Wilson and the development of the San Fernando Corridor, as well as a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers.

Response 38-3

The comment expresses an opinion in support of Alternative 2. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of a reuse alternative. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
Dear Mr. Duong:

I am a Glendale homeowner and resident, writing to urge you to prevent the demolition of the building at 3901 San Fernando Rd. As reported in the Glendale News Press, a thorough report by an independent historic resource consultant finds the building to be eligible for listing on both local and state historic registers. It is a rare and fine example of Mediterranean Revival architecture. Moreover, it was built by Lloyd Wilson, an important civic leader and businessman who helped develop and expand the San Fernando Rd. commercial corridor, an important feature of the south Glendale landscape through the present day. In the developer's draft EIR, the minimization of Wilson's role in Glendale's development is absolutely bewildering and calls its findings into serious question. The building's significance is both architectural and broadly historical.

Preserving 3901 San Fernando Rd. does not preclude development of the property. The draft EIR introduces an alternative proposal (#2--Reuse/Reduced Density) that meets the project's goals while diminishing negative environmental consequences and preserving this south Glendale structure. While the developer states that it is not economically viable, he provides no data. The city should insist that whatever the plans for the site are, preservation is given the highest priority.

It is dismaying how little regard Glendale has shown for its historic commercial resources. I hope that 3901 San Fernando Rd. will mark a turning point. If the city's goals are to attract "young professionals" to live here, it needs to provide them with the kinds of older, architecturally interesting, human-scale buildings that make the neighboring communities they flock to now so attractive--places like Atwater Village, Eagle Rock, Pasadena, Silver Lake, etc. It is not the case that "if you build it they will come." This population needs to be lured to Glendale with the right kind of building, like the existing Mediterranean Revival building. Beyond that, the building is a beautiful asset to anyone who cares about our city's aesthetics and history. Preserving it will demonstrate that Glendale considers its treasures worth preserving and is becoming more thoughtful about development.

Thank you for your consideration.

Sincerely,

Catherine Jurca
1845 Niodrara Dr.
Glendale, CA 91208

October 11, 2103

Rathar Duong
Planning Division
City of Glendale
633 E Broadway, Room 103
Glendale, CA 91026

Dear Mr. Duong:

I am a Glendale homeowner and resident, writing to urge you to prevent the demolition of the building at 3901 San Fernando Rd. As reported in the Glendale News Press, a thorough report by an independent historic resource consultant finds the building to be eligible for listing on both local and state historic registers. It is a rare and fine example of Mediterranean Revival architecture. Moreover, it was built by Lloyd Wilson, an important civic leader and businessman who helped develop and expand the San Fernando Rd. commercial corridor, an important feature of the south Glendale landscape through the present day. In the developer's draft EIR, the minimization of Wilson's role in Glendale's development is absolutely bewildering and calls its findings into serious question. The building's significance is both architectural and broadly historical.

Preserving 3901 San Fernando Rd. does not preclude development of the property. The draft EIR introduces an alternative proposal (#2--Reuse/Reduced Density) that meets the project's goals while diminishing negative environmental consequences and preserving this south Glendale structure. While the developer states that it is not economically viable, he provides no data. The city should insist that whatever the plans for the site are, preservation is given the highest priority.

It is dismaying how little regard Glendale has shown for its historic commercial resources. I hope that 3901 San Fernando Rd. will mark a turning point. If the city's goals are to attract "young professionals" to live here, it needs to provide them with the kinds of older, architecturally interesting, human-scale buildings that make the neighboring communities they flock to now so attractive--places like Atwater Village, Eagle Rock, Pasadena, Silver Lake, etc. It is not the case that "if you build it they will come." This population needs to be lured to Glendale with the right kind of building, like the existing Mediterranean Revival building. Beyond that, the building is a beautiful asset to anyone who cares about our city’s aesthetics and history. Preserving it will demonstrate that Glendale considers its treasures worth preserving and is becoming more thoughtful about development.

Thank you for your consideration.

Sincerely,

Catherine Jurca
Letter No. 39: Catherine Jurca

Response 39-1

Please refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR regarding the building’s connection to L.H. Wilson and the development of the San Fernando Corridor, as well as a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers.

Response 39-2

Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 39-3

The comment expresses general opinions about the City of Glendale and the preservation of buildings. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
From: Sonia Montejano [mailto:stmontejano@gmail.com]  
Sent: Friday, October 11, 2013 11:52 AM  
To: Duong, Rathar  
Subject: 3901 SAN FERNANDO ROAD

Dear Rather Duong,

I am contacting you as a concerned citizen over the possible demolition of one of the few remaining examples of a Mediterranean Revival architectural style commercial building on the corner of San Fernando and Central Blvd.

Recently, the city of Glendale had been undergoing a wave of construction projects, impacting its population density and future traffic congestion. I moved to Glendale because it still retained a "small town" feel, though very much a modern city. It would be shame to allow this structure to be demolition, and it why I must express my opposition. It is not OK.

Please do not allow the proposed demolition of said structure! There are many other options before that drastic measure is taken. I ask you to please consider preserving this beautiful building from our past and allow it to remain standing for all to see.

Sincerely,

Sonia T. Montejano
Letter No. 40: Sonia Montejano

Response 40-1

The comment expresses an opinion opposed to the proposed project. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of a reuse alternative. Please also refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
From: Ruth Campbell <lzglotz@pacbell.net>
Sent: Friday, October 11, 2013 12:45 AM
To: Duong, Rathar
Subject: SAVE 3901 SAN FERNANDO ROAD!

I like to think that the people who run Glendale are smarter than the politicians who are destroying Los Angeles. In L.A., they don't seem to care about preserving the past. Glendale generally (but not always) does the right thing and protects its old buildings. I moved here because of all the beautiful old buildings. That's the absolute truth.

Please protect 3901 San Fernando Road and tell the owner that he'll have to tear down some other building -- one that doesn't matter -- if he wants to pursue his oversized (and, I'm sure, characterless) building. STOP HIM, please! I'm very concerned about this, and very angry that yet another greedy developer wants to destroy a charming piece of Glendale's past to rake in a lot of money for himself.

Sincerely, Ruth Campbell
Letter No. 41:  Ruth Campbell

Response 41-1

The comment expresses an opinion opposed to the proposed project. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
From: Alexander Rojas [mailto:alexrojas5@yahoo.com]
Sent: Friday, October 11, 2013 9:24 AM
To: Duong, Rathar
Subject: Don't demolish our history.

The thought of demolishing the building that stands at 3901 San Fernando Rd is so very wrong. The city of Glendale is tearing down nearly every sign of it's architectural history at a frightening rate. There's almost nothing left of what once was.

The building at 3901 San Fernando Rd is a rare example of Mediterranean Revival commercial architecture that was once so prominent in Glendale. Once it's gone, it's gone for good. No photograph can replicate or replace the real experience of being in the physical presence of such wonderful buildings.

PLEASE DO NOT TEAR DOWN THIS BUILDING.

Alex Rojas
3.0 Comment Letters and Responses

Letter No. 42: Alex Rojas

Response 42-1

The comment expresses an opinion opposed to the proposed project. Please refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
I am writing to oppose the demolition of the building located at 3910 San Fernando Road which is part of the Glendale Link Project. This building has historic significance as it was a major building in the town formerly known as Tropico which was annexed to Glendale. It also has architectural significance as it is in the Mediterranean revival style which was popular in the 1920's and '30's. I live in the Silverlake district of Los Angeles which is near Glendale, but when I go to my doctor in the Glendale memorial office building across the street from this structure, I often park in front of it and admire it as a historic building. Glendale has a history of losing historic structures. This is why I urge you to support an adaptive reuse of this structure as what has occurred at the Seeley Mattress building at the corner of Brand and San Fernando Rd. which has incorporated lofts but saved the original structure.

Sincerely, Marilyn T. Oliver, member of the Glendale Historical Society.
Letter No. 43: Marilyn Oliver

Response 43-1

Refer to **Topical Response 1** Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR regarding the historic significance of the building located at 3901 San Fernando Road. As explained therein, this building has no connection to the town formerly known as Tropico.

Response 43-2

Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers.

Response 43-3

Refer to **Topical Response 2** and **Appendix F02** to the Final EIR regarding the feasibility of a reuse alternative.
From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Monday, October 14, 2013 8:21 AM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Comment on DRAFT EIR / Opposition of Demolition of Historic Building at 3901 San Fernando Road

-----Original Message-----
From: Scott Lasken [mailto:scott@stratagemdesigninc.com]
Sent: Friday, October 11, 2013 8:45 AM
To: Duong, Rathar
Subject: Opposition of Demolition of Historic Building at 3901 San Fernando Road

Mr. Duong,

I support an alternative for the Glendale Link Project that preserves the building.

The city should pursue Alternative 2-Reuse/Reduced Density Alternative for the Glendale Link Project, which meets the developer’s goals while allowing for preservation and adaptive reuse of the building.

The existing structure is a rare example of Mediterranean Revival commercial architecture in Glendale.

The building’s association with L.H. Wilson, a leading advocate for the development of the San Fernando commercial corridor, makes it historically as well as architecturally significant.

The city of Glendale has an unfortunate history of allowing demolition of potentially historic structures. We cannot afford to lose any more.

Please do not demolish this building!

Thank you,
Scott Lasken
Stratagem Design, Inc.
2572 Gardner Place
Glendale, CA 91206
(818) 242-3513
scott@stratagemdesigninc.com
www.stratagemdesigninc.com
Letter No. 44: Scott Lasken

Response 44-1

Refer to Response 26-2.

Response 44-2

Refer to Response 26-3.

Response 44-3

Refer to Response 26-4.

Response 44-4

Refer to Response 26-5.
I have owned a home in Glendale for over twenty years. I periodically travel to South Glendale, and am finally pleased to see quality developments in that part of the city. I hope that one day we will have a community similar to Silverlake or Atwater in that part of town. The Link Project will replace an eye soar on San Fernando Rd. The billboard on top of that building is an embarrassment for the City of Glendale. A gateway to the city is befitting of a beautiful project.

After reviewing the DEIR on your website, I am satisfied with the contents of that report. I completely support the demolition of the existing buildings and the construction of the beautiful 142 unit building.

Regards, Ara Mirzayan
Letter No. 45: Ara Mirzayan
Response 45-1

The comment includes statements in support of the proposed project. The comment will be forwarded to the decision maker prior to taking action on the proposed project.
Dear Mr. Duong,

We are longtime Glendale resident homeowners. One of the features of this beautiful city that attracted us to settle here was the historic residential and commercial architecture. I'm not going to reiterate all of the more than reasonable arguments I'm sure that you have already heard or will hear about 3901 San Fernando Road's place in Glendale's commercial history and its special architectural features. I would like you rather to think for a moment of this prominently sited building's impact on the many Glendale drivers who pass by it every day and also of the many pedestrians who stroll past it, not to mention the people who live on the neighboring streets. If metering devices were installed on the street and on the sidewalk that measured the degree of positive emotional response that this beautiful, nostalgic, and impressive building instilled in its observers (even if they're not consciously aware of it), I think that any question of its demolition would be rendered moot. If there were a row of spectacular jacaranda trees lining the sidewalk and the city came and cut them down, people who got pleasure from the sight of the trees, who experienced a moment of bliss and contemplation of the wonders of nature and the beauty of their city would be rightfully upset. 3901 San Fernando is like that row of jacarandas. It is a feature, not a burden. It is a gem that was born in a time of bright optimism for Glendale's future, a time when that optimism was directly translated into creating a graceful and striking building in which everyone in the city could take pride. That is its mission and it should be allowed to continue to fulfill it.

Thank you for listening.
Anita Weaver
Bill Clifton
Letter No. 46: Anita Weaver

Response 46-1

The commenter expresses an opinion opposed to the proposed project. Please refer to **Topical Response 1**, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and **Appendix F01** to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. The comment will be forwarded to the decision maker prior to taking action on the proposed project.
I support the development of south Glendale and the Link Project. I like that it is so close to the metrolink station and bus transportation. I am pleased that the existing buildings will be demolished, because they really have made this area of south Glendale which is a key gateway into the city look like an area unbecoming to the great city. Moreover, I am happy that badly needed low income housing will be added to the city supply at no cost to us taxpayers. This 142 unit mixed use project has my support.

Viktoria Shypkova
Glendale Resident

Sent from my iPhone
Letter No. 47: Viktoryia Shypkova
Response 47-1

The comment includes statements in support of the proposed project. The comment will be forwarded to the decision maker prior to taking action on the proposed project.
From: Richard Lee <rc.lee@charter.net>  
Sent: Sunday, October 13, 2013 10:04 PM  
To: Duong, Rathar  
Subject: Re: Opposition to the Demolition of 3901 San Fernando Road

Mr. Duong:

We support the project alternative for the Glendale Link Project that would preserve and incorporate the existing structure into the commercial/residential development proposed for the site.

- The city should pursue Alternative 2-Reuse/Reduced Density Alternative for the Glendale Link Project, which meets the developer’s goals while allowing for preservation and adaptive reuse of the building.
- The existing structure is a rare example of Mediterranean Revival commercial architecture in Glendale.
- The building’s association with L.H. Wilson, a leading advocate for the development of the San Fernando commercial corridor, makes it historically as well as architecturally significant.
- The city of Glendale has an unfortunate history of allowing demolition of potentially historic structures. We cannot afford to lose any more.

Thank you,

Richard & Carol Lee  
925 Penshore Terrace  
Glendale, CA 91207  
626-300-4990
Letter No. 48: Richard Lee
Response 48-1

The comment expresses an opinion in support of Alternative 2. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2.

Response 48-2
Refer to Response 26-2.

Response 48-3
Refer to Response 26-3.

Response 48-4
Refer to Response 26-4.

Response 48-5
Refer to Response 26-5.
I support the **project alternative** for the Glendale Link Project. It is important that the city preserve and use these existing historical structures.

Don Savarese (Glendale resident for 42 years)
1223 Loreto Dr.
Glendale, CA 91207
Letter No. 49: Don Savarese

Response 49-1

The comment expresses an opinion in support of Alternative 2. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2. Please also refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers.
Dear Mr. Duong:

Re: 3901 San Fernando Road, Glendale Link Project

I strongly recommend that Alternative 2 be chosen when the City evaluates the Draft Environmental Impact Report, as it would retain most of the original structure. Buildings in southern Glendale have been demolished at an alarming rate over the years, and the building at this prominent location is a statement of the importance of Glendale’s history.

If Alternative 2 is indeed financially infeasible, we need to see the numbers so that the City and engaged parties can work with the developer to identify modifications that would address this factor. Of course the developer needs to be made whole, but all projects have the potential for multiple iterations. The economic success is important to every stake holder in the community.

Thank you for putting my opinion on record.

Marcia Hanford
Resident since 1980
818-246-2379
3.0 Comment Letters and Responses

Letter No. 50: Marcia Hanford

Response 50-1

The comment expresses an opinion in support of Alternative 2. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2.

Response 50-2

Refer to Response 50-1.
Dear Rathar,

I am writing to express my opposition to the demolition of the building at 3901 San Fernando Rd., and support for the Alternative 2-Reuse/Reduced Density Alternative to incorporate this structure into the proposed development. I am a young resident of Glendale, and have recently purchased my first home here. The City of Glendale has allowed too many of its precious architectural resources to be demolished, obliterating major parts of the city's heritage and history for current and future generations. The City should treasure the remaining buildings that were erected during its infancy, not demolish them. In light of current events in Beverly Hills, where historically significant homes have been overlooked and destroyed in favor of new construction or are set for demolition, Glendale should take steps to protect the historical buildings that remain for current and future generations to enjoy and appreciate. There are many communities that appreciate their old buildings, and retain them through re-use, making those places attractive and desirable. Glendale has historically not been one of those communities, but has the potential to be should this type of destruction cease. Once the old buildings are gone, they are gone forever.

Thank you for your attention to this matter.

Sincerely,

Christina Rizzo
Letter No. 51: Christina Rizzo

Response 51-1

The comment expresses an opinion in support of Alternative 2. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2.

Response 51-2

The comment expresses an opinion opposed to the proposed project and general opinions about the City of Glendale and the preservation of buildings. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
I oppose the proposed demolition of the building at 3901 San Fernando Road.

Why not preserve the building? What are the plans for the site if the building was demolished? Please advise. Thanks!

Jeff
Letter No. 52.      Jeff Sredni

Response 52-1

The comment expresses an opinion opposed to the proposed project. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of a reuse alternative. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Please refer to Chapter 3.0 Project Description of the Draft EIR for the proposed project plans.
Rather, Attached for the record are my comments on the Draft Environmental Impact Report for the Glendale Link Project.

Thank you for the opportunity to provide this input.

Sean Bersell
1213NorthMaryland@mindspring.com
818-531-4362
October 14, 2013

Rathar Duong
Planning Division
City of Glendale
633 E Broadway, Room 103
Glendale, CA 91026-4386

RE: Draft EIR for Glendale Link Project

Dear Mr. Duong,

I am writing to oppose demolition of 3901 San Fernando Road. The Draft Environmental Impact Report [EIR] for the Glendale Link Project makes at least two serious errors: (1) in failing to recognize the historical significance of the contributions of Lloyd H. (L. H.) Wilson to the development of the San Fernando Road corridor as we know it today; and (2) in not acknowledging that 3901 San Fernando Road is associated with events that have made a significant contribution to history of Glendale and surrounding regions. These omissions contributed substantially to the finding that “impacts [of project implementation] related to cultural resources would be less than significant.” I believe that once the errors are corrected, the impacts on cultural resources will be found to be significant and, therefore, the current Alternative 2—Reduced Density/Reuse Alternative, which would mitigate those impacts, should be adopted.

L. H. Wilson and the San Fernando Road Area

The Draft EIR concludes that the Mediterranean Revival structure at 3901 San Fernando Road, which would be demolished to make way for the Glendale Link Project, is not eligible for inclusion in the Glendale Register in part because “[t]here is no evidence that [L. H.] Wilson’s business activities were a significant achievement in comparison with the accomplishment of other realtors and developers of the period.” A review of the historical record demonstrates that this conclusion is erroneous.

“The name L. H. Wilson has become synonymous with the remarkable development along the San Fernando road. When you say San Fernando road you think of Wilson. When you say Wilson you think of San Fernando road.”

“L. H. Wilson Makes Things Hum on San Fernando Road”
Glendale Evening News, January 1, 1924
L. H. Wilson built 3901 San Fernando Road, recruited an industrial enterprise to the building, and maintained his office there from 1930-1938. Far from being just one of many real estate agents operating in Glendale at the time, Wilson was a major developer and booster of the San Fernando Road corridor. As noted in his obituary, Wilson "was instrumental in promoting much of the city's industrial growth and development, particularly in the western part of the city."

In addition to Wilson's earlier contributions to the development of the San Fernando Road corridor noted in the Draft EIR, Wilson was a driving force in the development of the corridor through the time that 3901 San Fernando was built. In 1928, it was reported that Wilson was responsible for bringing 70 industrial concerns to Glendale in the prior eight years, including 14 in that year alone. Wilson had significant holdings along San Fernando and would lease land he owned to industrial concerns and in a number of cases erect the structures. In 1928 alone, he built nine industrial buildings and sold five of them. A June 1929 article notes that Wilson was in the process of erecting six industrial buildings on West Windsor that were already leased. After constructing 3901 San Fernando, he leased a portion of it to a shoe factory. It is clear from these accounts and others that Wilson was a significant force, and possibly the most significant force, in the creation of the San Fernando Road corridor as we know it today.

In addition, as a property owner and developer in the San Fernando Road corridor, Wilson was an active proponent of the effort to widen San Fernando Road in the late 1920s. The widening of San Fernando in Glendale took many years. First proposed in 1923 and authorized and partially funded in 1924, work did not begin until December 1930 due to the need to acquire the rights to 540 properties along the expanded alignment (at a cost of more than $1,000,000). The former road was of varying widths, was too narrow to accommodate the increasing traffic, and poorly paved. Additionally, with the designation of the section of San Fernando Road through Glendale as a portion of U.S. Route 99 in 1926, the road become part of the major west coast artery from Mexico to Canada, bringing even more traffic to the thoroughfare. The original plan was to make San Fernando Road 100 feet wide in Glendale, but when the expansion was finally undertaken, the width was reduced to 62-1/2 feet in the northern portion and 66 feet in the southern section. As a result of this project, San Fernando Road became the boulevard that exists today.

Although the full extent of his involvement with the widening project is not known, Wilson was described as "one of the leaders of the improvement" and appears to have been an informal liaison for the project with the business community. The Final EIR for the Glendale Link Project should explore more fully Wilson's involvement with the San Fernando Road widening.

Wilson was a member of the board of directors of the Glendale Realty Board for 20 years and was its president from 1928-1930, notably including the time when 3901 San Fernando was built. As the Realty Board president, Wilson was a civic booster of Glendale. For example, in June of 1929, the Los Angeles Times did a feature article on new manufacturing facilities in Glendale that appears to have relied on Wilson as its sole source, describing him as an "industrial expert."
Wilson was also a civic leader. He served a term as president of the Glendale parks board and several terms as a director of the Glendale Chamber of Commerce. He was active in a number of fraternal and social organizations and was a director of the California Real Estate Association.\textsuperscript{17}

Notably, when Wilson passed away, it was front page news.\textsuperscript{18}

Based on the foregoing, there is no doubt that L. H. Wilson was an integral figure in the development of the San Fernando Road corridor of Glendale as we know it today, as was acknowledged in his lifetime. The San Fernando Road corridor was a significant factor in the economic development and growth of Glendale and adjacent areas in the 1920s and 1930s (and beyond). L. H. Wilson, therefore, was a significant figure in the history of Glendale in the first half of the twentieth century.

**Significance of 3901 San Fernando Road to Local and Regional History**

3901 San Fernando Road is an example of the type of industrial building with aesthetically pleasing design and architecture that L. II. Wilson built on spec in the San Fernando Road corridor and then leased or sold to industrial tenants. In this case, the industrial tenant was the West Coast Style Shoes factory.\textsuperscript{19}

In discussing another of his industrial buildings, Wilson articulated his development ethos:

We kept away from the stereotyped design of Industrial structures and decided to erect a building that would be a credit not only to the industrial section of Glendale but to the business or residential districts as well. Not only have we set our faces steadily against anything shoddy in construction but we have insisted on architecture and designs that have added a beautiful building to those we have erected in this industrial area.

"Wilson Brings New Factories"
Glendale News-Press, August 4, 1928

3901 San Fernando reflects that ethos. It is not just a utilitarian structure; rather, it was designed to complement a predominant architectural style of its time and is unusually attractive for an industrial building.

Since 3901 San Fernando Road is an example of the type of industrial building that L. H. Wilson built on spec in the San Fernando Road corridor, the building is associated with events that have made a significant contribution to the board patterns of local and regional history and is identified with important events in the city’s history and exemplifies significant contributions to the broad economic heritage of the city of Glendale, specifically, the development of the San Fernando Road corridor by L. II. Wilson.
Conclusion

I respectfully request that the final EIR for the Glendale Link Project incorporate the facts I have provided and that the evaluations of Criteria 1 and 2 for eligibility for the California Register of Resources Places and Criteria 1 and 2 for eligibility for the Glendale Register of Historic Resources be revised to reflect that L. H. Wilson significantly contributed to the history of the city of Glendale and that 3901 San Fernando Road is historically significant.

Because 3901 San Fernando Road is associated with a person who significantly contributed to the history of the city and is associated with events that have made a significant contribution to history of Glendale and surrounding regions, the property is eligible for listing on both the California Register and the Glendale Register and the city, therefore, should not approve the demolition of the structure but, rather, should adopt Alternative 2-Reuse/Reduced Density Alternative for the Glendale Link Project.

Thank you for the opportunity to provide this information.

Sincerely,

[Signature]

Sean Devlin Barnes

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1 Draft EIR, p. 4.3-24.
4 “Brokers Build City Industry,” supra.
12 “Supervisors Get Busy,” supra; “Paving and Widening to Give Work,” supra.
13 “Allays Fears of Widening Orders on San Fernando,” supra.
16 "Glendale Lists New Factories," supra.
17 "L. H. Wilson Summoned by Death," supra.
18 "L. H. Wilson Summoned by Death," supra.
Letter No. 53: Sean Bersell

Response 53-1

The comment provides introductory text to the comments below. Refer to Responses 53-2 through 53-4 for responses to specific comments.

Response 53-2

The comment provides statements regarding L.H. Wilson’s role in the development of San Fernando Road. Refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR regarding L.H. Wilson and the development of San Fernando Road.

In addition to the points addressed in Topical Response 1 and the Draft EIR regarding L.H. Wilson, the commenter points to L.H. Wilson’s possible involvement in the widening of San Fernando Road. The widening of San Fernando Road was one of several road widening and highway improvement projects in Los Angeles County in the 1920s. While local government officials and citizens supported these programs, there is no evidence that L. H. Wilson had a significant role in the widening of San Fernando Road in Glendale. Research conducted on Wilson’s life and provided in Appendix 4.3 of the Draft EIR, and Appendix F01 of the Final EIR, did not uncover any substantial connection between L.H. Wilson and the widening of San Fernando Road.

Response 53-3

The comment relates to the perceived architectural significance of the 3901 San Fernando Road building. Refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR regarding the significance of the building, its architectural integrity, its eligibility for listing on local, state, and national historic registers, and its association with events that have made a significant contribution to the broad patterns of local and regional history.

Response 53-4

Please refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR regarding the building’s eligibility for listing on the California or Glendale registers. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the economic feasibility of Alternative 2.
From: Desiree Shier [mailto:desiree.shier@sbcglobal.net]
Sent: Monday, October 14, 2013 8:37 AM
To: Duong, Rathar
Subject: 3901 San Fernando Road

Rathar,

I hope you are doing well. I wanted to take a minute to encourage you and the City of Glendale to pursue Alternative 2-Reuse/Reduced Density Alternative for the Glendale Link Project. I feel this meets the developer's goals while allowing for preservation and adaptive reuse of the building. It would be so unfortunate to lose this rare example of Mediterranean Revival commercial architecture at 3901 San Fernando in Glendale. We have very few of these buildings left in Glendale and to demolish this building would be a travesty.

Please consider the Alternative option.

Thank you,

Desiree Shier
Glendale Resident / Chairperson of Historic Preservation Commission
3.0 Comment Letters and Responses

Letter No. 54: Desiree Shier

Response 54-1
Refer to Response 26-2.

Response 54-2
Refer to Response 26-3.
Dear Mr. Duong,

I am writing to ask that the Mediterranean Revival structure at 3901 San Fernando Road be preserved as part of any development plans for the site. I drive by it frequently, and it's a lovely building, certainly eligible for the local register of historic resources.

Having spent my half century in the Pasadena-Glendale area, I have seen historic preservation done badly and well. When done right, Pasadena's thriving old-town results. Glendale's record on historic preservation, particularly of commercial buildings, is very disappointing. It seems like the city's architecture is becoming more mediocre with every passing day; that is certainly no way to entice people to move here or to shop here.

Please make preservation an important part of improving the city's image.

Sincerely,

Scott Fraser
Glendale, CA
Letter No. 55: Scott Fraser

Response 55-1

The comment expresses an opinion in support of Alternative 2. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2. Please also refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR for a discussion of the building’s eligibility for listing on local, state, and national historic registers.

Response 55-2

The comment expresses general opinions about the City of Glendale but does not raise an environmental concern within the context of CEQA. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
Mr. Duong:

I would like to state my opposition to the proposed demolition of the building at 3901 San Fernando Road. It is my understanding this building has been deemed eligible for historic designation on both the city of Glendale Register and the state of California Register by an independent preservation expert. Destroying this unusual example of Mediterranean Revival commercial architecture makes little sense.

What I do support is the project alternative for the Glendale Link Project that would preserve and incorporate the existing structure into the commercial-residential development proposed for this site. Thus, I hope the city will pursue Alternative 2- Reuse/Reduced Density Alternative for this project, as it appears to meet the developer’s objectives, concurrently allowing for the preservation and adaptive reuse of the existing building.

I hope you and the Planning Department will consider my comments and suggestions in your deliberation about the fate of this historically significant and architecturally significant Glendale building.

Respectfully,
Stephanie Schus
Royal Blvd.
Letter No. 56: Stephanie Schus

Response 56-1

The comment expresses an opinion opposed to the proposed project. Please refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. As stated therein, the building at 3901 San Fernando Road has been determined to be ineligible for the local, state, and national historic registers.

Response 56-2

The comment expresses an opinion in support of Alternative 2. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2.
From: Duong, Rathar <RDuong@ci.glendale.ca.us>
Sent: Monday, October 14, 2013 11:08 AM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: Comment on DRAFT EIR / Do Not Demolish

From: Tony [mailto:tony@eliteadventuretours.com]
Sent: Monday, October 14, 2013 11:05 AM
To: Duong, Rathar
Cc: tghs@glendalehistorical.org
Subject: Do Not Demolish

As a Glendale resident & business owner we agree and believe that this structure should be preserved and celebrated. http://myemail.constantcontact.com/Action-Needed-Re--Proposed-Demolition-of-Historic-Structure-on-San-Fernando-Road.html?soid=1102335654902&aid=IhYhl-H8Ylo

Tony Riccio
EliteAdventureTours.com
818-216-0067
888-328-6871
Preservation Alert!

TGHS requests that you contact the city by October 14 and voice your opposition to the proposed demolition of the building at 3901 San Fernando Road, which has been identified by an independent preservation expert as eligible for historic designation on both the Glendale and California Registers. Please let the city know that you prefer the project alternative that would preserve and incorporate the existing structure into the commercial/residential development proposed for the site.

http://myemail.constantcontact.com/Action_Needed_Re-Proposed_Demolition_of_Histori... 10/15/2013
3901 San Fernando, built in 1930 and pictured above, is a distinctive example of Mediterranean Revival architecture and is one of the few remaining commercial structures of that style left in Glendale. It is historically important for its association with L.H. Wilson, who built the structure and maintained his offices there. Wilson was a real estate agent and civic leader who was a leading proponent and facilitator of the creation of the San Fernando Road commercial corridor as we know it today.

The current owner of the property has proposed tearing the building down and erecting a five-story mixed-use structure, with 15,000 square feet of commercial space on the ground floor and 142 housing units above. The proposal is known as the Glendale Link Project.

A Draft Environmental Impact Report (EIR) prepared for the project identifies an alternative ("Alternative 2--Reduced Density/Reuse Alternative") that would preserve the existing structure while still allowing for residential and commercial development of the property. The alternative to demolition was requested by TGIS and is discussed in detail here.

The city needs to hear from the community about this project. Please email Rathar Duong in the city of Glendale Planning Department (RDuong@ci.glendale.ca.us) and inform the city that you support an alternative for the Glendale Link Project that preserves the building. It's best to use your own words, but some of the points you may wish to consider:

- The city should pursue Alternative 2-Reuse/Reduced Density Alternative for the Glendale Link Project, which meets the developer's goals while allowing for preservation and adaptive reuse of the building.
- The existing structure is a rare example of Mediterranean Revival commercial architecture in Glendale.
- The building's association with L.H. Wilson, a leading advocate for the development of the San Fernando commercial corridor, makes it historically as well as architecturally significant.
The city of Glendale has an unfortunate history of allowing demolition of potentially historic structures. We cannot afford to lose any more.

The deadline for submitting comments is Monday, October 14, at 5:00 p.m., so please take a moment and email the city today. Your comments can make the difference in whether this building will survive or be demolished.

Thank you for helping to preserve Glendale's architectural heritage and history.

The Glendale Historical Society
P.O. Box 4173
Glendale, California 91202

Letter No. 57: Tony Riccio

Response 57-1

The comment expresses an opinion opposed to the proposed project and in support of the preservation of the building at 3901 San Fernando Road. The comment expresses an opinion in support of Alternative 2. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 57-2

The commenter provides information from the Glendale Historical Society website relating to the proposed project. The comment does not raise a specific environmental concern within the context of CEQA. This information will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
Dear Mr. Duong,

I am writing to show my support for preserving the Mediterranean Revival building on the above address. Glendale has not been very diligent over the years in preserving our historical resources. Unlike other cities, we have not taken care of our city in that way. It is very simple and cavalier for a developer to suggest "let's just tear this down" and start fresh. Glendale currently already has enough of that kind of building going on all along Central Ave and other adjacent streets, not to mention all the tasteless remodeling and demolition that has taken away part of our history in the past.

The ideal solution when faced with buildings of this history and architecture would be to pursue solutions that would meet the developers goal while allowing for preservation and create adaptive reuse of the building.

Thank you for listening,
Gerri Cragnotti
Owner/Broker
G&C Properties
818-244-5400 Ofc/818-383-1499 cell
www.gerricragnotti.com
www.character-homes.com
BRE# 0346376

Misspellings compliments of my iPad auto correct.
Letter No. 58: Gerri Cagnotti

Response 58-1

The comment expresses an opinion opposed to the proposed project and in support of a reuse alternative. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2. Please refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
Please do all that you can to prevent the demolition of this building. Glendale has already lost so many of its historic structures. Here is an opportunity to send a message to developers and the community that the city is willing to go out on a limb to hang on to these old treasures.

Judy Cabrera
1442 Imperial Drive
Letter No. 59: Judy Cabrera

Response 59-1

The comment expresses an opinion opposed to the proposed project. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
Dear Mr. Duong:

It pains me to see another one of Glendale’s potential gems go to the chopping block, and I am here to write you that I am opposed to the ‘wholesale slaughter’ that is planned for this piece of historical property/building. I must add my voice to the many others who want to prevent this from happening, and I think you should adopt Alternative 2 - Reuse/Reduced Density Alternative for this project.

Glendale has far too few historical and precious 'linkages' to the past, and we want and must preserve and keep for the future these properties that bind us together as a city, as identification to worthwhile beautiful buildings which enrich us all. We must not level these structures in order to put up, often hastily and often poorly designed and shoddily built new structures.

I remember we lost the original Fire Station to make way for the Americana - give me a break. I happen to think that colossus of a development would have gained greatly by preserving and incorporating the humble station and would have given a 'link' to the past; how wonderful that would have been, and the builder would have had a little jewel in his midst.

Please do all you can to unearth this hidden rarity and let it shine again with all its numerous cousins.

Ute Baum
Dina Hughes
1208 Cottage Grove
Glendale, Ca. 91205
Letter No. 60: Ute Baum

Response 60-1

The comment expresses an opinion opposed to the proposed project and in support of a reuse alternative. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.

Response 60-2

The comment expresses general opinions about the City of Glendale and the preservation of buildings, but does not raise an environmental concern within the context of CEQA. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
Mr. Duong,

My husband Bill and I agree with the Glendale Historical Society regarding 3901 San Fernando Road. We would like to see the historic building preserved and support alternative 2 - reduced density/reuse alternative.

Please let the decision makers know of our opinion.

Thank you,

Sharon Weisman
Far North Glendale
Letter No. 61: Sharon Weisman

Response 61-1

The comment expresses an opinion opposed to the proposed project and in support of a reuse alternative. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
Hello Rather

I want to add my name to those opposing the demolition of another important structure in Glendale's history. Far too many structures have been lost in the modernization of the city. Wherever possible, historical structures should be integrated into the planning and design of new projects. And, this is one of those.

Thank you,

Bill Nicoll
Letter No. 62: Bill Nicoll

Response 62-2

The comment expresses an opinion opposed to the proposed project and in support of a reuse alternative. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2. Please refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. As stated therein, the building at 3901 San Fernando Road has been determined to be ineligible for the local, state, and national historic registers. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
From: anna rundle <annarundle@aol.com>  
Sent: Monday, October 14, 2013 1:10 PM  
To: Duong, Rathar  
Subject: 3901 SAN FERNANDO ROAD  

As a member of the Glendale Historical Society, and a believer in preserving as much of Glendale's past as is practical, I am asking that the Society pursue the preservation of the building at 3901 San Fernando Road.

WE HAVE ALLOWED TOO MANY MEDITERRANEAN REVIVAL BUILDINGS IN THE CITY DISAPPEAR - LET'S KEEP THIS ONE!

ANNA RUNDLE
Letter No. 63: Anna Rundle

Response 63-1

The comment expresses an opinion opposed to the proposed project and in support of a reuse alternative. Refer to Topical Response 2 and Appendix F02 to the Final EIR regarding the feasibility of Alternative 2. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
From: Jean Christensen [mailto:jwc1520@gmail.com]
Sent: Monday, October 14, 2013 4:58 PM
To: Duong, Rathar
Subject: 3901 San Fernando

Please add this building to the Glendale historic list of buildings. Too many of the buildings along this corridor have been lost. It is important to keep representatives of the 1930s. This building is unique to the area.

Jean Christensen
Letter No. 64: Jean Christensen

Response 64-1

The comment expresses an opinion opposed to the proposed project. Please refer to Topical Response 1, Section 4.3 of the Draft EIR, Appendix 4.3 to the Draft EIR, and Appendix F01 to the Final EIR for a discussion of the architectural integrity of the building and its eligibility for listing on local, state, and national historic registers. As stated therein, the building at 3901 San Fernando Road has been determined to be ineligible for the local, state, and national historic registers. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
It is exiting to see a new development in south Glendale. This part of the city has been stagnant for many years and it is about time that a developer stepped up to the plate.

The project will replace two dreary and characterless building not to mention the huge billboard. This gateway location should represent the city of Glendale.

The people that will argue that the building is historical never leave their North Glendale comfort zone to see what is going on in south Glendale and what conditions people live in.

The project will create much desired quality low income housing adjacent to a transportation center. The community as a whole will benefit hugely from this development.

This 142 unit, mixed use project has my full support.

Talin Zadourian
Glendale Resident.
Letter No. 65: Talin Zadourian
Response 65-1

The comment includes statements in support of the proposed project. The comment will be forwarded to the decision maker prior to taking action on the proposed project.
From: Duong, Rathar [mailto:RDuong@ci.glendale.ca.us]
Sent: Monday, November 04, 2013 10:10 AM
To: Jessica Kirchner Flores
Cc: Rodney Khan; George Garikian
Subject: FW: Potential demolition of Historic site

This email went into the Junk E-mail folder; as such, I did not see it until now.

Rathar

-----Original Message-----
From: Berry, Elizabeth B [mailto:eberry@csun.edu]
Sent: Monday, October 14, 2013 8:05 PM
To: Duong, Rathar
Subject: Potential demolition of Historic site

I am concerned that once again Glendale is considering the demolition of an historical building without considering its significance and a possible alternative. Recently, the city seems to have become more enlightened in its recognition of the importance of preserving historic and architecturally interesting buildings. However, I understand that here is a possibility of destroying 39901 San Fernando Road, which was built in the 1930's and is a rare example of Mediterranean Revival commercial.

There is an option: Alternative 2 Reuse Reduce density Alternate to Glendale Link Project. So much ill advised development has overridden wise and informed conservation in Glendale.

I hope it won't continue with this project.

I have lived here fifty years and have been so pleased with successful attempts to preserve historic sites; I hope this case will be successful.

Sincerely,
Elizabeth Berry, 1210 Cortez Drive Glendale, 91207
Letter No. 66: Elizabeth Berry

Response 66-1

The comment expresses an opinion opposed to the proposed project and in support of a reuse alternative. Refer to Topical Response 2 regarding the feasibility of Alternative 2. The opinion of the commenter will be included as part of the record and made available to the decision makers prior to a final decision on the proposed project.
4.0 MITIGATION MONITORING AND REPORTING PROGRAM

PURPOSE

The Mitigation Monitoring and Reporting Program (MMRP) has been prepared in conformance with Section 21081.6 of the California Environmental Quality Act (CEQA). It is the intent of this program to (1) verify satisfaction of the required mitigation measures of the EIR; (2) provide a methodology to document implementation of the required mitigation; (3) provide a record of the Monitoring Program; (4) identify monitoring responsibility; (5) establish administrative procedures for the clearance of mitigation measures; (6) establish the frequency and duration of monitoring; and (7) utilize existing review processes wherever feasible.

INTRODUCTION

The Mitigation Monitoring Program describes the procedures that will be used to implement the mitigation measures adopted in connection with the approval of the project and the methods of monitoring such actions. A Monitoring Program is necessary only for impacts which would be significant if not mitigated. The following consists of a monitoring program table noting the responsible entity for mitigation monitoring, the timing, and a list of all project-related mitigation measures.
### Table 4.0-1
Mitigation Monitoring and Reporting Program Matrix

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Mitigation Monitoring Timing</th>
<th>Responsible Monitoring Entity</th>
<th>Mitigation Measure Complete?</th>
<th>Effectiveness</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Impact – Cultural Resources</strong></td>
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<tr>
<td>4.3-1 In the event that archaeological resources are unearthed during project subsurface activities, all earth-disturbing work within a 200-meter (656-foot) radius shall be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. The appropriate mitigation measures may include recording the resource with the California Archaeological Inventory database or excavation, recordation, and preservation of the sites that have outstanding cultural or historic significance.</td>
<td>During ground-disturbing construction activities</td>
<td>Community Development Department</td>
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<tr>
<td>4.3-2 In the event that paleontological resources are unearthed during project subsurface activities, all earth-disturbing work within 100-meter (328-foot) radius shall be temporarily suspended or redirected until a paleontologist has evaluated the nature and significance of the find. After the find has been appropriately mitigated, work in the area may resume. The appropriate mitigation measures may include recording the resource with the California Inventory database or excavation, recordation, and preservation of the sites that have outstanding paleontological significance.</td>
<td>During ground-disturbing construction activities</td>
<td>Community Development Department</td>
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<tr>
<td>4.3-3 If human remains are unearthed, California Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC will then contact the most likely descendant of the deceased Native American, who will then serve as consultant on how to proceed with the remains (i.e., avoid, rebury).</td>
<td>During ground-disturbing construction activities</td>
<td>Community Development Department</td>
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<tr>
<td><strong>Impact – Geology and Soils</strong></td>
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<tr>
<td>4.4-1 Geotechnical recommendations 7.1 through 7.11 contained in Section 7.0, Recommendations, of the Geotechnical Investigation Report prepared for the proposed project by Garcrest Engineering and Construction, Inc., dated May 2013, shall be implemented during project construction.</td>
<td>Prior to issuance of grading permit</td>
<td>Department of Building and Safety</td>
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</tbody>
</table>
## Mitigation Monitoring and Reporting Program

### Impact - Noise

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Mitigation Monitoring Timing</th>
<th>Responsible Monitoring Entity</th>
<th>Mitigation Measure Complete?</th>
<th>Effectiveness</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.7-1</td>
<td>Prior to construction</td>
<td>Community Development Department</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.7-2</td>
<td>Prior to issuance of grading permit</td>
<td>Community Development Department, Public Works Department</td>
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</tr>
<tr>
<td>4.7-3</td>
<td>During ground-disturbing construction activities</td>
<td>Community Development Department</td>
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</tbody>
</table>

- The applicant shall provide notification to adjacent residences at least 10 days in advance of construction activities that are anticipated to result in vibration levels above the thresholds.

- Prior to issuance of a demolition permit, the applicant shall submit a construction plan to the City for review and approval. The construction plan shall include phases of construction, anticipated equipment, and timetables for each phase/equipment type. The following features shall be included in the construction plan:
  - Demolition, earthmoving, and ground-impacting operations shall be conducted so as not to occur in the same period.
  - Demolition methods shall minimize vibration, where possible (e.g., sawing masonry into sections rather than demolishing it by pavement breakers).
  - Earthmoving equipment on the construction site shall be operated as far away from vibration sensitive sites as possible.

- All construction activity within the City of Glendale shall be conducted in accordance with Section 8.36.080 of the City of Glendale Municipal Code.
<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Mitigation Monitoring Timing</th>
<th>Responsible Monitoring Entity</th>
<th>Mitigation Measure Complete?</th>
<th>Effectiveness</th>
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</thead>
<tbody>
<tr>
<td><strong>Impact – Noise</strong> (continued)</td>
<td>Prior to issuance of grading permit</td>
<td>Community Development Department, Public Works Department</td>
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<tr>
<td><strong>4.7-4</strong></td>
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<tr>
<td>The project applicant shall require through contract specifications that the following construction best management practices (BMPs) be implemented by contractors to reduce construction noise levels:</td>
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<td>• Two weeks prior to the commencement of construction, notification must be provided to surrounding land uses within 1,000 feet of a project site disclosing the construction schedule, including the various types of activities that would be occurring throughout the duration of the construction period;</td>
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<tr>
<td>• Ensure that construction equipment is properly muffled according to industry standards and be in good working condition;</td>
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<tr>
<td>• Place noise-generating construction equipment and locate construction staging areas away from sensitive uses, where feasible;</td>
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<tr>
<td>• Schedule high noise-producing activities between the hours of 8:00 AM and 5:00 PM to minimize disruption on sensitive uses;</td>
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<tr>
<td>• Implement noise attenuation measures to the extent feasible, which may include, but are not limited to, temporary noise barriers or noise blankets around stationary construction noise sources;</td>
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<tr>
<td>• Use electric air compressors and similar power tools rather than diesel equipment, where feasible;</td>
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<tr>
<td>• Construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment, shall be turned off when not in use for more than 30 minutes; and</td>
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<tr>
<td>• Construction hours, allowable workdays, and the phone number of the job superintendent shall be clearly posted at all construction entrances to allow for surrounding owners and residents to contact the job superintendent. If the City of Glendale or the job superintendent receives a complaint, the superintendent shall investigate, take appropriate corrective action, and report the action taken to the reporting party. Contract specifications shall be included in the proposed project construction documents, which shall be reviewed by the City of Glendale prior to issuance of a grading permit.</td>
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</table>
### Impact – Noise (continued)

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Mitigation Monitoring Timing</th>
<th>Responsible Monitoring Entity</th>
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</thead>
<tbody>
<tr>
<td>4.7-5</td>
<td>Prior to issuance of grading permit</td>
<td>Community Development Department, Public Works Department</td>
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<tr>
<td>4.7-6</td>
<td>Prior to issuance of grading permit</td>
<td>Community Development Department, Public Works Department</td>
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</table>

### Impact – Fire Protection and Emergency Medical Services

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Mitigation Monitoring Timing</th>
<th>Responsible Monitoring Entity</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.8.1-1</td>
<td>Ongoing</td>
<td>Glendale Fire Department</td>
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</table>

### Impact – Police Protection

<table>
<thead>
<tr>
<th>Mitigation Measure</th>
<th>Mitigation Monitoring Timing</th>
<th>Responsible Monitoring Entity</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.8.2-1</td>
<td>Ongoing</td>
<td>Glendale Police Department</td>
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</table>

### Impact – Recreation

<table>
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<tr>
<th>Mitigation Measure</th>
<th>Mitigation Monitoring Timing</th>
<th>Responsible Monitoring Entity</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.8.3-1</td>
<td>Prior to tentative tract map approval</td>
<td>Community Development Department, Community Services</td>
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<tr>
<td>Mitigation Measure</td>
<td>Mitigation Monitoring Timing</td>
<td>Responsible Monitoring Entity</td>
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<td>------------------------------------------------------------------------------------------------</td>
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<tr>
<td>Impact – Utilities and Service Systems - Sewer</td>
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<tr>
<td>4.10.2-1 The project applicant shall pay a sewer impact fee for improvements and upgrades to the sewer system. These collected fees will be deposited by the City of Glendale into a specially created account to be used to fund capacity improvements.</td>
<td>Prior to tentative tract map approval</td>
<td>Community Development Department, Public Works Department</td>
</tr>
<tr>
<td>4.10.2-2 Each project shall contribute sewer capacity increase fees for improvements and upgrades to alleviate sewer impacts within the City. Fees would be determined based on the City’s sewer capacity increase fee methodology. These collected fees would be deposited into a specially created account to be used to fund capacity improvements of the Citywide drainage system.</td>
<td>Ongoing (prior to applicable project approval)</td>
<td>Community Development Department, Public Works Department</td>
</tr>
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04  PROJECT DATA
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06  EXISTING ALTA
07  ILLUSTRATIVE SITE PLAN
08-10  SITE DIAGRAMS
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12  RENDERING OF SAN FERNANDO
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L1-L12  LANDSCAPE DESIGN
LD1-LD12  LIGHTING DESIGN
S1-S21  SIGNAGE DESIGN

Owner:
KARECO
1211 Cortez Drive
Glendale, CA 91207
(818)634-2161
Contact: George Garikian
ggarikian@calcarwash.com

Design Team:
Architect:
TCA Architects

LA:
801 S. Grand Ave., Suite 1020
Los Angeles, CA 90017
(213)553-1100
OC:
19782 MacArthur Blvd., Suite 300
Irvine, CA 92612
(949)862-0270
Contact: Eric Olson, AIA,NCARP, LEED AP
eolson@tca-arch.com

Landscape Architect:
LRM
10335 Jefferson Blvd.,
Culver City, CA 90232
(310)839-6600
Contact: Charles Elliott
celliott@lrmld.com

Lighting Consultant:
KGM
270 Coral Circle
El Segundo, CA 90245
(310)532-2191
Contact: Martin van Koolbergen
mvan@kgmlighting.com

Signage Design:
TCA Architects
19782 MacArthur Blvd., Suite 300
Irvine, CA 92612
(949)862-0270
Contact: India Howlett
ihowlett@tca-arch.com
The Link Glendale is a transit-oriented, high-density multi-family apartment and mixed-use project at the southern tip of Glendale’s San Fernando Road corridor. The urban and architectural concepts derive from comprehensive analysis of the site and environmental conditions. The design approach also adheres to Glendale’s vision to revitalize an underutilized but dynamic urban area that can support an environmentally conscious lifestyle. The close proximity of the site to medical employers, regionally connected transportation center, and essential neighborhood retail stores provides rare opportunity in this region for residents to live and work in a walkable community that reduces auto dependency.

Program:

The program consists of 142 units of rental apartments and resident recreation over approximately 11,200 sf of ground level retail stores, and 5,000 sf of commercial studio space. Commercial parking is accommodated at the ground level and resident parking in two basement levels.

Site Description:

The 1.05 acre rectangular site is bound by San Fernando Road at the northeast, Central Avenue at the southeast, a public alley at the southwest, and a drugstore’s parking lot at the northwest. Both streets are major bus routes serving multiple lines. Central Avenue leads to the Glendale Transportation Center Amtrak and Metrolink commuter station to the south, and to the Galleria and Americas shopping centers and downtown Glendale to the north. Los Feliz Road, a major commercial corridor, intersects San Fernando Road at the north end of the block, and connects to the 5 Freeway to the west. San Fernando Road passes through industrial areas to the north and south and is used by commuters as an alternate to the 5 Freeway.

Major components within five minute walking distance of the site include the Glendale Memorial Hospital, the Glendale Transportation Center, a power center with Costco, Best Buy and other stores, numerous restaurants, banks and auto-related services, and various other retail, commercial and light-industrial uses.

Team Approach:

Kareco and its team, with TCA, have been working closely with City staff toward a common goal to positively impact the community. In terms of uses to be provided as well as urban design and visual design considerations, at an important site in this part of the Glendale.

Urban Design Strategy:

With comparable height and massing to the under-construction Glendale Triangle project directly across the street, The Link will act together with that project as a powerful gateway to Glendale, framing San Fernando Road near the City’s south border. These projects will announce this part of Glendale as a vibrant, urban, high-density residential neighborhood for the first time. The nearby hospital and medical office buildings, still now an isolated precipice, are given context and complementary uses by the new projects.

Located at the prominent San Fernando Road and Central Avenue intersection, the visibility of The Link is enhanced when seen traveling north on San Fernando Road by a slight bend in that street’s alignment. Traveling south on Central Avenue it is also prominent, opposite both the left and right turns lanes onto San Fernando Road. With their different site geometries, The Link and the Triangle together set up a powerful gateway dynamic at this intersection.

Pedestrian activity in the neighborhood is associated with the hospital, transit stops and local shops and businesses, and the Triangle and The Link will soar amplify this activity with hundreds of new residents.

The San Fernando Road crosswalk at Central Avenue is an important connector in the neighborhood. Drawing on the foot-traffic at this intersection, The Link provides a corner plaza, offering a sunny place for outdoor seating, and shade under a canopy at the storefront. The plaza is associated with a prominent corner retail or restaurant space and is distinctly identified architecturally. Glass storefront extends along both streets till it is interrupted by colonnaded arcades marking, respectively, the residential building entrance on San Fernando Road, and studio space on Central Avenue.

Accommodation of Building Program: Resident & Building

User Experience:

Retail and studio space and the residential building entrance front the streets at the ground floor. The elevator lobby and lounge of the residential entrance have windows to the street arcade, and the elevator lobby at each residential level overlooks San Fernando Road.

At the second floor podium level, the pool courtyard, accessed through a resident lounge amenity space, is immediately visible. Outdoor, unenclosed light-well courts, with plantings at this level and overlooked from all levels above, punctuate the hallways, providing natural light, orientation and a sense of the outdoors as residents make their way to their apartments.

Commercial parking at the ground level is accessed from a driveway on San Fernando Road for visibility for visitors, as well as from the rear alley. A walkway leads visitors from the parking area to the sidewalk, near both the retail spaces and the residential entrance. Basement resident and guest parking is accessed by ramp from the alley.

Architectural Design Strategy:

The Link’s rectangular, urban block corner calls for a strong, grounded anchor opposite the Triangle’s kinetic corner blade. At the same time, the Triangle’s solid façade with regular, repetitive windows and balconies opposite The Link on San Fernando Road suggests a contrasting, perhaps playful counterpoint. The design seeks to deftly integrate these complexities.

A frame of horizontal bands on the San Fernando Road and Central Avenue facades establishes the five-story height of the building like the staff lines on a sheet of music. The bands rise from above the storefront base to the roof parapet and connect milky-green glass balcony guardrails and similar-colored spandrel panels between window and balcony openings. At the street intersection, the glassy frame of alternating bands of windows and spandrel, guardrail and open balcony, is fully revealed, acting as a light and translucent, yet strong corner beacon. Along the street facades, vertical forms of solid material, their height rising and falling, play over the horizontal frame like music notes.

The “notes” are made with metal and fiber cement board cladding, some shiny, some colorful, some thicker or thinner, and detailed with windows outlined with bright color. A simplified version of this expression is employed at the rear alley and courtyards, with planter walls and guardrails of cement board and metal pickets of glass. The building’s north wall adjacent to the drugstore parking lot is made of plaster panels with offset planes, echoing the lines and rhythms of the street facades.

Project-identification signs, vertical and complementary to the “notes”, are placed on each facade. A projecting blade sign marks the residential building entrance, another announces the building on Central Avenue. Elevation signs extending above the building parapet on the north and west facades are seen from Los Feliz Road and from Central Avenue.

Landscape Design Strategy:

The landscape design for The Link is intended to complement and enhance the architectural character of the building while also responding to the existing fabric of the area. In the public domain, street tree typology is in conformity to the City’s tree-scape guidelines and are under-planted with shrubs and ground cover to facilitate the pedestrian scene. Plantings are also provided within the property at the corner plaza and within the underground arcades at the residential building entry and at the studio space. In this way, foliage, interest and detail are brought to the pedestrian experience for building users and the public. Podium level landscape provides an outdoor oasis for residents. Amenities such as pool, spa, barbeque, fireplace, and various seating and lounging areas with different qualities, create special zones or "people places". Planting in light-well courts at hallway intersections brings landscape to residents’ routes to their homes. Within the courtyard, careful attention is paid to plant species selection due to different climatic conditions based on sun exposure. Sustainability will be achieved by matching plant species with micro-climate. An emphasis is placed on drought-tolerant plants, used where sun levels allow. Low irrigation water use is achieved with flow sensors, rain shut-off sensors, point source irrigation and a master controller.

THE LINK

PROJECT NARRATIVE

12.10.13 2012-044
A MUSICAL RHYTHM ALONG SAN FERNANDO ROAD

THE "LINKAGE" AT SAN FERNANDO & CENTRAL

THE "LINKAGE" AT SAN FERNANDO & CENTRAL

A MUSICAL RHYTHM ALONG CENTRAL AVE.

4 STORIES OF RESIDENTIAL OVER RETAIL

CONCEPT DIAGRAM

THE LINK

12.10.13 2012-044
I Unit Summary

<table>
<thead>
<tr>
<th>Type</th>
<th>Quantity</th>
<th>Size</th>
<th>Mix</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Bedroom</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A0</td>
<td>24</td>
<td>600</td>
<td>17%</td>
</tr>
<tr>
<td>A1</td>
<td>16</td>
<td>663</td>
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<tr>
<td>A2</td>
<td>64</td>
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<tr>
<td>A2.1</td>
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<td>76%</td>
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<td>2 Bedroom</td>
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<tr>
<td>B0</td>
<td>20</td>
<td>962</td>
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<td>B1</td>
<td>10</td>
<td>972</td>
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<tr>
<td>B2</td>
<td>4</td>
<td>1,077</td>
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<tr>
<td>Subtotal:</td>
<td>34</td>
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</tr>
<tr>
<td>Total:</td>
<td>142</td>
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<td>100%</td>
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I Density & Affordable Designation Summary

| Parcel Size (Acres) | 1.05 |
| Allowable Density DU/AC | 100 |
| Units Allowed: | 105 |
| Plus 35% Affordable Bonus: | 37 |
| Total Allowed: | 142 |
| Very-low-income-household units: | 12 |

I Commercial Space Summary

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<thead>
<tr>
<th>Type</th>
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<tr>
<td>Office Space:</td>
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<tr>
<td>Studio/Industrial Space:</td>
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I Open Space & Landscape Area Summary

<table>
<thead>
<tr>
<th>Type</th>
<th>Units</th>
<th>Area Required:</th>
<th>Total:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Open Space Provided:</td>
<td>142</td>
<td>140</td>
<td>19,880</td>
</tr>
<tr>
<td>Ground floor arcades:</td>
<td></td>
<td>2,337</td>
<td></td>
</tr>
<tr>
<td>Podium courtyards:</td>
<td></td>
<td>9,574</td>
<td></td>
</tr>
<tr>
<td>Podium Interior amenity space:</td>
<td>1,942</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unit balconies @ 50sf/unit:</td>
<td>50</td>
<td>6,824</td>
<td></td>
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<tr>
<td>Total open space:</td>
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<td>20,677 sf</td>
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<tr>
<td>Planted Landscape Area Provided:</td>
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<tr>
<td>Ground floor:</td>
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<th>Units</th>
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<th>Stalls</th>
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<td>Resident Parking</td>
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<tr>
<td>1-Bedroom Units</td>
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<td>1</td>
<td>108</td>
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<tr>
<td>2-Bedroom Units</td>
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<td>2</td>
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<td>Resident Guest Parking</td>
<td>142</td>
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<td>Commercial Parking</td>
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<td>Retail</td>
<td>2.6</td>
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<td>Studio/Industrial</td>
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<td>43</td>
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<tr>
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<table>
<thead>
<tr>
<th>Type</th>
<th>Direct</th>
<th>Tandem**</th>
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<td>Residential</td>
<td>145</td>
<td>31</td>
<td>176</td>
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<tr>
<td>Commercial/Retail</td>
<td>43</td>
<td>4</td>
<td>47</td>
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<td>Total Provides Parking:</td>
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*second stalls allocated to 2-br units are tandem stalls
**30.36.090(C) Parking Concession: Tandem Parking Permitted

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<tr>
<th>Type</th>
<th>Units</th>
<th>Ratio</th>
<th>Spaces</th>
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<td>Residential - long term</td>
<td>142</td>
<td>0.25</td>
<td>36</td>
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<td>Residual - short term</td>
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<td>0.05</td>
<td>7</td>
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<tr>
<td>Retail - long term</td>
<td>per 12,000 sf</td>
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</tr>
<tr>
<td>Retail - short term</td>
<td>per 5,000 sf</td>
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<td>3</td>
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<table>
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<th>Storage sf</th>
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<td>24</td>
<td>3,408</td>
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</table>
**Open Space & Landscape Area Summary**

<table>
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<tr>
<th>Units x Area Required</th>
<th>Total: 142</th>
<th>140</th>
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<tbody>
<tr>
<td>Open Space Provided:</td>
<td>19,880 sf</td>
<td>REQUIRED</td>
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<tr>
<td>Ground floor arcades:</td>
<td>2,337</td>
<td></td>
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<td>Podium courtyards:</td>
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<td>Unit balconies @ 50 sf/unit:</td>
<td>6,824</td>
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<tr>
<td>Total open space:</td>
<td>20,877 sf</td>
<td>PROVIDED</td>
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*Public Open Space: 2,337 SF

**Open Space Exhibit**

12.10.13 2012-044
THE LINK

ILLUSTRATIVE SITE PLAN

4 STORIES OF RESIDENTIAL OVER RETAIL

S. CENTRAL AVE.

SAN FERNANDO ROAD
THE LINK

TRANSPORTATION DIAGRAM

12.10.13  2012-044
THE LINK

RENDERING OF CENTRAL AND SAN FERNANDO
LOOKING NORTH WEST ALONG CENTRAL AVE.

THE LINK

AERIAL MASSING MODEL
LOOKING SOUTH AT SAN FERNANDO AVE.

THE LINK

AERIAL MASSING MODEL

12.10.13 2012-044
THE LINK

PODIUM LEVEL (2ND) PLAN

12.10.13  2012-044
THE LINK

MATERIALS AND COLORS

A1 SW7022 (Metal Siding), patterns will vary
A2 SW6958 (Fiber Cement Board), patterns and color will vary
A3 SW6286 (Fiber Cement Board) pattern and color will vary
A4 SW7670 (Plaster)
A5 SW7019 (Metal)
A6 SPANDREL GLASS
B1 CLEAR ANODIZED/ KYNAR 500, FACTORY FINISH (Aluminum)
B2 CLEAR ANODIZED/ KYNAR 500, FACTORY FINISH (Aluminum)
B3 WHITE (Stock Color)
B4 CLEAR ANODIZED/ KYNAR 500, FACTORY FINISH (Aluminum)

COMMERCIAL STOREFRONT

C1 CLEAR ANODIZED/ KYNAR 500, FACTORY FINISH (Aluminum)

CURTAIN WALL

COURTYARD GUARDRAIL

PRIMARY GUARDRAIL

12.10.13 2012-044
SHADING DEVICE AROUND VINYL WINDOW

- A7 SW6373 (Metal)

SIDEWALK PLANTER WALL

- A10 GREEN (Burnished Block)

CANOPY OVER RETAIL PARKING ENTRY

- A11 SW6000 (Metal)
NOTE: WINDOWS SHALL BE SIMILAR OR EQUAL TO THE REPRESENTATIVES SHOWN ON THIS EXHIBIT.

**HomeMaker 3**

HM155 Vinyl Picture Window - HM170 Architectural Shapes

The HM155 vinyl picture window and the HM170 vinyl architectural shape windows offer superior style and traditional craftsmanship with detailed features like 3 1/2 inch frame depth and multi-chambered frame. The numerous architectural shape options and grid patterns HM3 offers will bring the outdoors into your home with style. The MIWD HomeMaker windows are designed for energy efficiency, comfort, style and peace of mind. The HMI3 window styles include a slider, single-hung, casement, awning, picture window and architectural shapes.

**STOREFRONT SYSTEM**

**Take a closer look at the HM155 Picture Window**

- **3 1/2" Frame Depth**
- **Low E Glass with Insulated Glass**
- **E-Shape Frame**
- **Patio Door**
- **Multi-Chambered and Multi-Stacked**

**COLORS**
- White
- Brown
- Bronze

**COLOR OPTIONS**
- With Screen
- No Screen

**THE LINK**

**VINYL SLIDING WINDOW**

**WINDOWS**

12.10.13 2012.044
METAL SIDING OR FIBER CEMENT BOARD SIDING

VINYL WINDOW SYSTEM

METAL FRAME PROJECTION SURROUNDS THE VINYL WINDOW

WINDOW HEADER/JAMB
Scale: 1" = 1'-0"

CORNER WINDOWS ALONG ALLEY

ARCHITECTURAL DETAILS
SIGNAGE CONNECTION AT RETAIL LEVEL
Scale: 1" = 1'-0"

SIGNAGE SUPPORT
WALL MOUNTER
BLADE SIGNAGE
EXTERIOR WALL FINISH W/ ACCENT COLOR

METAL PARAPET AROUND SPANDREL/ CURTAIN WALL SYSTEM

ROOF LEVEL
SPANDREL GLASS
SPANDREL AT PARAPET
Scale: 1" = 1'-0"

THE LINK

ARCHITECTURAL DETAILS
DECK

UNIT DECK FINISH

TEMPERED GLASS DECK RAILING SYSTEM

FASCIA MOUNT DECK SUPPORT

PLASTER FINISH SOFFT AT DECK

UNIT DECK RAILING

Scale: 1" = 1'-0"
**KEY NOTES**

1. FIREPLACE
2. BBQ W/ BAR & COUNTER
3. POOL
4. SPA
5. WATER FEATURE
6. TRELLIS
7. POOL ENCLOSURE - TALL, NON-COMBUSTIBLE FENCE W/ SELF CLOSING / SELF LATCHING HARDWARE
8. BUILT IN SEATING
9. BANQUETTE
10. MOVABLE FURNITURE
11. PRIVATE PATIO
12. BENCH
13. PLANTER
14. ENHANCED PAVING
15. NEW CITY SIDEWALK, PER CITY STDS.
16. NEW STREET TREE PER URBAN FORESTRY DIVISION
17. STREET LIGHT
18. STREET SIGNAL
19. PROPERTY LINE
20. PERIMETER PLANTING
21. BIKE RACK
22. RAISED PLANTER
23. PORTABLE PLANTER
24. EXISTING STREET TREE TO REMAIN
25. VEHICULAR ENTRANCE
26. PARKWAY PLANTING
27. LIGHT WEIGHT PATIO WALL
28. SOLID PATIO WALL
29. FITNESS EQUIPMENT

**NOTES**

REQUIRED BIKE PARKING - 7 RESIDENTIAL AND 3 RETAIL

---

**THE LINK**

**LEVEL 1 - ENLARGEMENT PLAN**
KEY NOTES:
1. FIREPLACE
2. BBQ W/ BAR & COUNTER
3. POOL
4. SPA
5. WATER FEATURE
6. TRELLES
7. POOL ENCLOSURE - 5' TALL, NON-CLIMBABLE FENCE W/ SELF CLOSING / SELF LATCHING HARDWARE
8. BUILT IN SEATING
9. BANQUETTE
10. MOVABLE FURNITURE
11. PRIVATE PATIO
12. BENCH
13. PLANTER
14. ENHANCED PAVING
15. NEW CITY SIDEWALK, PER CITY STDS.
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27. LIGHT WEIGHT PATIO WALL
28. SOLID PATIO WALL
29. FITNESS EQUIPMENT

NOTES:
- REQUIRED BIKE PARKING - 7 RESIDENTIAL AND 3 RETAIL

LEVEL 1 - ENLARGEMENT PLAN

THE LINK

+103.00 F.F.

LRM

LEVEL 1 - ENLARGEMENT PLAN

12.10.13 2012:044
KEY NOTES
1. FIREPLACE
2. BBQ, W/ BAR & COUNTER
3. POOL
4. SPA
5. WATER FEATURE
6. TRELLIS
   - POOL ENCLOSURE - 5' TALL
   - NON-CLIMBABLE FENCE W/ SELF CLOSING / SELF LATCHING HARDWARE
7. BUILT IN SEATING
8. BANQUETTE
9. MOVABLE FURNITURE
10. PRIVATE PATIO
11. BENCH
12. PLANTER
13. ENHANCED PAVING
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27. SOLID PATIO WALL
28. FITNESS EQUIPMENT

NOTES
REQUIRED BIKE PARKING -
7 RESIDENTIAL AND 3 RETAIL
KEY NOTES
1. FIREPLACE
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3. POOL
4. SPA
5. WATER FEATURE
6. TRELLIS
7. POOL ENCLOSURE - 5' TALL, W/ SELF CLOSING / SELF LATCHING HARDWARE
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19. PROPERTY LINE
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22. RAISED PLANTER
23. PORTABLE PLANTER
24. EXISTING STREET TREE TO REMAIN
25. VEHICULAR ENTRANCE
26. PARKWAY PLANTING
27. LIGHT WEIGHT PATIO WALL
28. SOLID PATIO WALL
29. FITNESS EQUIPMENT

THE LINK
LEVEL 2 - ENLARGEMENT PLAN
POOL DECK

COURTYARDS

STREET LEVEL

PAVING MATERIALS

CONCEPT IMAGERY
CENTRAL ELEVATION - LIGHTING

THE LINK

EXTERIOR ACCENT LIGHTING
CENTRAL ELEVATION - LIGHTING

GRAZING BACKLIGHT FRAMING EFFECT
UNIFORM AMBIENT LIGHTING AT PEDESTRIAN ARCADE
SPOTLIGHT FOR VERTICAL ACCENT
GRAZING LIGHT AT BLADE SIGN
FLOATING EFFECT AT BASE OF BUILDING ELEMENTS
BACKLIT CORNER CANOPY

XF-1, XF-1A, XF-1B
XF-7
XF-5
XF-4
XF-3
XF-2

THE LINK

EXTERIOR ACCENT LIGHTING
ALLEY ELEVATION - LIGHTING

- Lighting at private entrances.
- Lighting overhanging doors to be used at required light levels for safety (Type Xf-7).
- Grading Throught Effect at side of building.
- Grading detailing effect back to steps for safety.
- Surface Mounted Lighting for overhead surface effect.

THE LINK

KAPLAN GEHRING MCCARROLL ARCHITECTURAL LIGHTING
ALLEY ELEVATION - LIGHTING

LIGHTING AT PRIVATE TERRACES

UNIFORM AMBIENT LIGHTING AT PEDESTRIAN ARCADE

GRAZING BACKLIGHT FRAMING EFFECT

XE-9

XE-7

XE-1, XE-1A, XE-1B

THE LINK

KAPLAN GEBRING MCCARROLL
ARCHITECTURAL LIGHTING

12.10.13 2012-044
LIGHTING AT PRIVATE TERRACES - CONTROLLED BY TENANT
MOUNTING LOCATIONS TO BE COORDINATED (TYPE XV)

SURFACE MOUNTED UPRIGHT TO HIGHLIGHT SIGNS

NORTH ELEVATION - LIGHTING

THE LINK

KAPLAN GEBRING MCCRORL ARCHITECTURAL LIGHTING

12/10/13  2012-044
GROUND LEVEL EXTERIOR PUBLIC SPACES - LIGHTING

- INDIRECT LIGHTING FOR LANTERN EFFECT AT MAIN ENTRY
- RECESSED LINEAR UPLIGHT FOR SILHOUETTE EFFECT
- FLOATING EFFECT AT BASE OF BUILDING ELEMENTS
- RETAIL ARCADE AS A LANTERN TO DRAW PEOPLE IN
- USE OF PENDANT LIGHTING IN PEDESTRIAN ARCADE

THE LINK
PODIUM LEVEL LANDSCAPE - LIGHTING

KEY PLAN

SHIELDED UPLIGHTS TO ACCENT TREES AND PROVIDE AMBIENT LIGHTING IN CORRIDORS

LINEAR LIGHTING INTEGRATED IN BASE OF PLANTERS ALONG PATHWAYS

ACCENT LIGHTING MOUNTED IN TREES

LIGHTING AT PRIVATE TERRACES

THE LINK
PODIUM LEVEL POOL COURTYARD - LIGHTING

- Decortative accent lighting at BBQ trellis to enhance atmosphere
- Wall recessed pathlights at stairs
- Wall mounted lighting at public doorways
- Accent lighting below and within trees for soft textured ambient light
- Accent lighting to feature elements to create perspective
- Low-level lighting at pool perimeter to minimize view obstructions

THE LINK
ADDRESS
3900 SAN FERNANDO AVE.
GLENDALE, CA

TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>CODE</th>
<th>DESCRIPTION</th>
<th>PAGE</th>
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<tr>
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<td>A</td>
<td>IDENTITY PROJECTING SIGN - STREET FACING</td>
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<td>IDENTITY WALL SIGN - ALLEY/CVS FACING</td>
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# Overall Signage

## Location Plan

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<thead>
<tr>
<th>No.</th>
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<tbody>
<tr>
<td>A</td>
<td>Identity Projecting Sign - Street Facing</td>
</tr>
<tr>
<td>B</td>
<td>Identity Wall Sign - Alley/CVS Facing</td>
</tr>
<tr>
<td>C</td>
<td>Identity Wall Sign - Small</td>
</tr>
<tr>
<td>D</td>
<td>Marquee Sign - Parking</td>
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<tr>
<td>E</td>
<td>Marquee Sign - Leasing</td>
</tr>
<tr>
<td>F</td>
<td>Directional Sign</td>
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<tr>
<td>G</td>
<td>Building Address Numbers</td>
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<tr>
<td>H</td>
<td>Tenant - Marquee Sign</td>
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<tr>
<td>I</td>
<td>Tenant - Small Blade Sign</td>
</tr>
<tr>
<td>J</td>
<td>Tenant - Glass Sign</td>
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<tr>
<td>K</td>
<td>Tenant - InformationDIRECTORY Sign</td>
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**THE LINK**

12.10.13  2012-044
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<td>SHERWIN WILLIAMS SW7022 ALPACA</td>
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<td>SPANDREL GLASS</td>
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<td>0123456789</td>
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CENTRAL AND SAN FERNANDO CORNER

THE LINK

IDENTITY PROJECTING SIGN
CVS PARKING LOT FACING ELEVATION

ALLEY ELEVATION

THE LINK

IDENTITY WALL SIGN - ALLEY / CVS FACING
<table>
<thead>
<tr>
<th>NO.</th>
<th>SIGN TYPE</th>
<th>SIGN AREA</th>
<th>FRONT SIDE</th>
<th>SIDE</th>
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<tr>
<td>A</td>
<td>IDENTITY PROJECTING SIGN - CENTRAL</td>
<td>84 SQ. FT.</td>
<td>4' 6&quot; 21&quot;</td>
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<tr>
<td></td>
<td>Fabricated brushed aluminum box with reverse cut letters with white acrylic flat panel lettering. Illuminated from within with internal white LED. Signage box to be mechanically secured to recessed wall area and conduits for electrical supply. Sign is double sided—same design each side.</td>
<td></td>
<td></td>
<td></td>
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</tbody>
</table>

| B   | IDENTITY WALL SIGN - ALLEY/CVS FACING | 100 SQ. FT. | 5' 20" |      |
|     | Fabricated brushed aluminum box with reverse cut letters with white acrylic flat panel lettering. Illuminated from within with internal white LED. Signage box to be mechanically secured to recessed wall area and conduits for electrical supply. |
IDENTITY WALL SIGN - SMALL
Fabricated brushed aluminum flat box sign with reverse out white back-lit letters. Run conduit for lighting from wall. Sign is one sided.
SIGN AREA: 9 SQ. FT. - UP TO 12 SQ FT
SCALE: 1" = 1'}
IDENTITY WALL SIGN - SMALL
Fabricated brushed aluminum flat box sign with reverse cut white backlit letters. Run conduit for lighting from wall. Sign is one sided.

SIGN AREA: 9 SQ. FT. - UP TO 12 SQ. FT.
SCALE: T&T
MARQUEE SIGN - PARKING
Fabricated brushed aluminum solid letters forms to be mechanically secured to fascia surround with spacers from above.
SIGN AREA: 8 SQ. FT. - UP TO 30 SQ. FT.
SCALE: 1" = 2' 5"

NIGHT TIME

RETAIL PARKING

EXIT CAUTION 7 FT CLEARANCE ENTER

12'
30'
16'

THE LINK

SIGNAGE DETAIL

12.10.13 2012-044
<table>
<thead>
<tr>
<th>NO.</th>
<th>SIGN TYPE</th>
</tr>
</thead>
<tbody>
<tr>
<td>D</td>
<td>MARQUEE SIGN - PARKING</td>
</tr>
</tbody>
</table>

Fabricated brushed aluminum reverse channel letters with a clear acrylic back cover and internal LED for halo illumination. Forms to be mechanically secured to fascia surround with spacers.

SIGN AREA: 2.5 SQ. FT. - UP TO 27 SQ. FT.

SCALE: 1" = 4'

**SIDE**

**FRONT**

---

**RETAIL PARKING**

EXIT  CAUTION 7 FT CLEARANCE  ENTER

---

**NIGHT TIME**

---

**THE LINK**

SIGNAGE DETAIL

12.10.13  2012-044
MARQUEE SIGN - PARKING
Fabricated brushed aluminum reverse channel letters with a clear acrylic back cover and internal LED for halo illumination. Forms to be mechanically secured to fascia surround with spacers.

SIGN AREA: 8.75 SQ. FT. - UP TO 24 SQ. FT.
SCALE: 1"=4'

THE LINK
SIGNAGE DETAIL
MARQUEE SIGN - LEASING
Fabricated brushed aluminum reverse channel letters with a clear acrylic back cover and internal L.E.D. for halo illumination. Forms to be mechanically secured to fascia surround with spacers.

SIGN AREA: 6 SQ. FT. - UP TO 20 SQ. FT.
SCALE: 1"=2.5'
**NO. SIGN TYPE**

**G**

BUILDING ADDRESS NUMBERS

Extruded acrylic fabricated to match spandrel glass. Back lit with L.E.D. for halo lighting. Sign is one sided.

PROPOSED SIGN AREA = 9 SQ. FT. - UP TO 64 SQ FT

SCALE: 1"/2'

**THE LINK**

BUILDING ADDRESS NUMBERS

12.10.13  2012.044
SIGNAGE GUIDELINES

Intent:
These signage guidelines are established for the purpose of assuring high quality retail tenant signage at THE LINK Glendale. All signage shall be designed and constructed to complement the project architecture and the neighborhood environment, reflecting the broader Glendale community aesthetic.

This document describes the acceptable types of signs, materials, locations, sizes and illumination methods and outlines the process for signage review and approval.

Interpretation and Compliance:
As administrators of the tenant sign criteria, the Owner/Landlord is the final arbitrator of criteria compliance. Special circumstances may require interpretation of these criteria, and the Owner/Landlord will remain flexible in the review process. However, these guidelines are approved by the City of Glendale and all signage must comply with section 30.33 of the Glendale Municipal Code and receive appropriate City issued signage permits before being fabricated or installed.

1.0 SUBMITAL, REVIEW AND APPROVAL PROCESS
Prior to construction of any sign or application for City sign permits, the tenant or tenant's representative must obtain the Owner/Landlord's written approval of the proposed sign design. The review and approval process shall be as follows:

1.1 Tenant to submit completed City of Glendale sign application along with required drawings to Owner/Landlord.
1.2 Owner/Landlord shall review designs and either approve, approve with corrections, or deny application within 10 days of receipt of application.
1.3 If application is denied, tenant shall review reasons for denial and then revise their application to address the Owner/Landlord's concerns and resubmit the application.
1.4 Once approval is granted by the Owner/Landlord, tenant may then proceed with their sign permit application to the City.
1.5 Signage installed without Owner/Landlord and/or City approval will result in the removal of signage at Tenant's sole expense.

2.0 GENERAL CRITERIA FOR ALL SIGNAGE
2.1 General Criteria
All signage shall be designed as an integral part of or complimentary to the architectural features of the buildings, landscape and/or storefront.

2.2 Sign Message
Use of Logos, corporate identity elements (such as symbols, special shapes, etc.) will be considered signage and are subject to all regulations contained in these guidelines.

2.3 Design Review Process
Prior to fabrication, all construction documents for signage, permanent or temporary, must be reviewed and approved by an authorized agent of the Owner/Landlord prior to submittal to the City for permitting. Drawings shall include locations, colors, dimensions, specifications and proposed construction materials and attachment methods.

2.4 Allowable Messages
Sign messages shall be limited to the project/tenant name and/or logo. Subtext, advertising or product messages may not be included as part of the project's or tenant's permanent signage.

2.5 Allowable Sign Types
The sign types outlined in these guidelines are the only signs permitted on the building or property.

2.6 Preferred Materials
Sign design and construction should include the use of high quality materials such as architectural grade metals, glass, stone, concrete, metal leaf, porcelain and hardwoods. Materials such as plastics, vinyl, or PVC products should be minimized.

2.7 Lighting
When sign lighting is permitted, in consideration of the predominant residential component of the project, light levels must be controlled so as to prevent glare and light shining directly into a residential space. Low voltage, LED and other high efficiency lighting is encouraged wherever appropriate. Further, sign lighting shall not create a nuisance to the THE LINK Glendale residential community or the surrounding neighborhood. Electricity for lighting must come from Tenant's space.

2.8 Installation
All signage installation shall be coordinated through the Owner/Landlord and executed by a licensed contractor approved by the City of Glendale.

3.0 PROHIBITED SIGNS AND SIGN COMPONENTS
In addition to the signs prohibited by the Glendale Municipal Code Section 30.33.040, the following signs and sign components are not permitted:

3.1 Cabinet type illuminated signs with plastic sign faces (unless specifically integrated into storefront architecture).
3.2 Open or exposed lamps, bulbs and/or neon tubes.
3.3 Vacuum formed plastic letters or sign faces.
3.4 Banners or temporary promotional signage (with the exception of promotional signage as described within these guidelines).
3.5 Moving, flashing, rotating, or odor producing signs. Variable message signs, including L.E.D., incandescent, flip matrix or other variable message display technologies.
3.6 The name, stamps or decals of the sign manufacturer, city permit information, U.L. labels etc. shall be applied in an inconspicuous manner.
3.7 Exposed non-ornamental hardware or electrical conduit and components.
3.8 Other than the specific retailer's name and logo, no brand or trade names, logos, trademarks, service marks or other graphic insignia are allowed.
3.9 Back-lit awnings with illuminated graphics are not allowed.
3.10 "A-Board" or "Sandwich" board signs - with the exception of those necessary on a temporary basis for residential leasing (to be approved by Landlord on a case by case basis). Location of these signs to be within 30 feet of 'A' and 'B' type monument.
3.11 'Human A-Boards':
3.12 No supplemental or incidental signs, other than as specifically described below, will be allowed. Other than the specific retailer's name and logo, no other brand or trade names, logos, trademarks, service marks or other graphic insignia shall be allowed. Prohibited examples include "Kodak", "Corona", "Budweiser", and "Lotto".

SIGNAGE DETAIL
4.0 RETAIL TENANT SIGNAGE - ALLOWABLE SIGN TYPES

4.1 TENANT CANOPY ID SIGNAGE

4.1.1 Purpose & Message - To provide primary identity for inline retail tenants and the residential Leasing Center. Sign message may only include the tenant name and/or logo. Leasing Center sign message may include the project name and a descriptive phrase (ie. “Leasing Center”) identifying the function of the facility. Signs shall comply with Section 30.33.120 of the Glendale Municipal Code.

4.1.2 Number of Signs Permitted - One (1) sign per tenant building elevation visible from street or right of way (public or private). Signs must be mounted to storefront canopies that are part of the tenant’s leased space. A tenant located at a building corner with two frontages may have one sign on each frontage with a canopy.

4.1.3 Types of Signs Permitted - Individual letter signs mounted to canopies only. Cabinet or panel signs will not be permitted. See sign location plans for canopy locations.

4.1.4 Illumination - Canopy mounted identification signs shall be non-illuminated, individual letter signs only. No exposed raceways or conduit will be allowed.

4.1.5 Sign Height - Maximum letter height shall not exceed 18” regardless of length of building frontage occupied by tenant. A corporate logo/symbol may be included at up to 24” maximum height, Total sign height may be no more than 24” in any case.

4.1.6 Sign Width - Maximum width of sign may be no more than 85% of the width of the canopy to which sign will be attached. Where one canopy spans more than one tenant storefront, the width from the store demising wall to the outside edge of the canopy shall determine the tenant’s canopy width.

4.1.7 Sign Area - Maximum sign area shall be controlled by the maximum height allowed (see 4.1.4) by the maximum width allowed (see 4.1.5)

4.2 TENANT BLADE SIGNAGE

4.2.1 Purpose & Message - Secondary identification signage mounted perpendicular to the building facade suspended under an architectural canopy. Sign message may only include the tenant name and/or logo. Blade signs are not intended for product advertising. Signs shall comply with Section 30.33.180 of the Glendale Municipal code.

4.2.2 Number of Signs Permitted - One (1) sign per tenant entry. Signs shall be mounted at or near the storefront entry door.

4.2.3 Types of Signs Permitted - Signage shall be a blade type mounted perpendicular to the building elevation. Custom shapes other than a rectangle or square are encouraged. Flat vinyl graphics are discouraged. Projecting signs are to be installed on custom metal brackets / hangers. In an attempt to promote individuality for each tenant, there will be no common bracket for blade signs. Tenants are encouraged to be creative in their design and fabrication of this element while integrating it visually with the canopy from which it is suspended.

4.2.4 Sign Area - May be a maximum of 6 square feet.

4.2.5 Illumination - All blade signs shall be non-illuminated.

4.2.6 Sign Height - Bottom of sign shall be 8’-0” minimum and shall not interfere with door swings.

4.3 TENANT GLASS GRAPHICS

4.3.1 Purpose & Message - Signage applied to glass windows and doors to provide secondary identity and to display courtesy messages. Sign message may only include the tenant name and/or logo, contact information, hours of operation and credit cards accepted. Signs shall comply with Section 30.33.320.B of the Glendale Municipal code.

4.3.2 Number of Signs Permitted - One (1) sign per tenant entry. Signs shall be mounted on or near the entry door.

4.3.3 Types of Signs Permitted - Signage shall be professionally hand painted or computer cut adhesive vinyl professionally applied directly to glass.

4.3.4 Sign Area - Maximum 25 percent of the window area where the sign is located. The logo and name of the store may be represented by letters up to a maximum height of 3”. Store hours on the entry door are encouraged. The store hours lettering may not exceed an area 9” high x 12” wide. Lettering shall be mounted between 4'-0” and 5'-6” from the bottom of the door storefront.

4.4 TENANT INFORMATION/DIRECTORY SIGN

4.4.1 Purpose & Message - Each tenant may display their name and/or logo on a Landlord/Owner supplied space or sign panel mounted to a freestanding directory structure.

4.4.2 Number of Signs Permitted - One (1) sign panel per tenant per face of structure.

4.4.3 Sign Area - Overall sign area per face of the directory structure shall not exceed 18 square feet.

4.4.4 Tenant Sign Size - Tenant panels will be approximately 6” high x 30” wide.

4.4.5 Sign Color - All tenant names shall utilize the project standard color as specified in the signage design drawings.
RETAIL SIGN LOCATIONS*

*Sign locations indicated are potential locations permitted under these guidelines. Actual sign locations may vary as multiple tenant spaces may include more than one canopy/entrance depending on amount of space occupied. Sign locations shown are subject to regulations set forth in section 4.0.
MARQUEE SIGN - RETAIL

Fabricated brushed aluminum reverse channel letters with a clear acrylic back cover and internal L.E.D. for halo illumination. Forms to be mechanically secured to fascia with spacers.

AS ALLOWED BY CODE

SCALE: 1"=2'
CITY OF GLENDALE CALIFORNIA
INTERDEPARTMENTAL COMMUNICATION

To: Glendale City Council

From: Alan Loomis, Principal Urban Designer, Community Development Dept

Cc: Allen Castillo, Senior Development Officer, Community Development Dept
Rather Duong, Planner, Community Development Dept

Date: December 10, 2013

Re: City Council Stage 2 Final Design Review for The Link

The following is an evaluation of the above project based on drawings prepared by TCA (Thomas Cox Architects) and dated August 22, 2013. Summary comments are provided on the final page of this memo.

Context

The project is located at a 1.05 acre property at the corner of San Fernando Road and Central Avenue, located across the street from the Triangle project and its iconic "ship's prow" feature.

The project is located within the Tropico Station district, an emerging mixed-use pedestrian- and transit-oriented district stretching along San Fernando Road between Los Feliz Road and Cerritos Park at Brand Boulevard. This district encompasses the Glendale Transit Center / Metrolink Station, Glendale Memorial Hospital, Cerritos Elementary School, and the main entrance to Forest Lawn Memorial Park. In addition to these dominant uses, the older industrial buildings and warehouses in this district support the Luna Playhouse and various furniture, tile and other similar showrooms / businesses, that with the art gallery and loft scene in adjacent Atwater Village creates in a nascent "arts and design" identity that anchors the south end of the San Fernando Road "Creative Corridor." As such, the character of this district is more architecturally eclectic and "edgier" than other areas of Glendale, such as Downtown or the GC3 Campus.

Project Description

The project is a five-story, 142-unit mixed-use building, with ground floor retail. The building is one story shorter than the Triangle project across the street, giving deference to this more important site. The design is also distinguished from the Triangle -- the façade has a musical pattern composed of a regular rhythm of vertical modules, finished in various materials and colors, and layered against a horizontal grid of balconies.
Project Design

Existing Buildings, Adaptive Reuse, and/or Historic Preservation

- **Existing Buildings** – The project site is presently occupied by two structures: a non-descript one-story warehouse and two-story building notable for nominal Spanish Revival finishes and pointed arch windows. Both buildings will be demolished to accommodate the new development.

Overall Site Plan

- **Site Plan** – The building is a conventional "podium" structure, with ground floor retail and a courtyard on the second floor. The courtyard faces southwest towards the alley, giving the building a U-shaped footprint, with full five-story facades fronting the two streets.

- **Setbacks** – The building essentially occupies the entire site with nominal setbacks, with insets for arcades along portions of both San Fernando Road and Central Avenue. Additionally, at the intersection of these two streets, the building is "notched" to create a deep setback appropriate for outdoor dining.

- **Open Space and Landscape** – As noted above, public open space is limited to arcades and the notched corner setback. Open space for residents is located in private balconies and two courtyards on the second floor. A small courtyard looks north to provide windows for units facing the adjacent CVS parking lot. A much larger courtyard with a pool, spa, firepit and seating areas faces southwest over the alley. Landscaping in the courtyard consists of enhanced paving, planters and trees as typical in similar projects, with a similar landscaping at the street level.

Mass and Scale

- **Height and Massing** – The building is uniformly five stories (or approximately 75 feet) high and since the plan has almost no setbacks, the façades sit at the property line. The impact of the building's mass, however, is mitigated by rhythmic pattern of the façade design. The façade is articulated by alternating solid masses of color and voids created by glass balconies. Visually evoking musical notation, the glass balconies create the staff, against which the solid masses are the "notes." Like musical notes, the solids vary in height—sometimes reaching from the sidewalk to the top of the building, and sometimes floating at various heights above the storefronts and topping off at various parapet heights.

- **Landmark Architectural Features** – The landmark feature at San Fernando / Central is the "ships prow" of the Triangle project where the streets intersect at an acute angle. Appropriately the proposed project does not try to upstage this iconic design.

Building Design and Detailing

- **Materials and Colors** – The primary design feature of the street façades and therefore the building is the repetitive pattern of column-like rectangular forms, each in one of three material finishes and colors. While the materials vary between vertical-arranged metal siding
or fiber cement panels, the colors alternate between purple/plum, grey/taupe, or turquoise. Yellow window frames, which echo the yellow façade of the Triangle development across the street, occasionally project beyond the facade. These repetitive columns of color are anchored by horizontal grid lines of glass balconies and spandrel glass.

- **Lighting and Signs** – Consistent with the overall architectural strategy, the lighting scheme emphasizes the rhythmic pattern of the vertical façade elements. The building will feature four large-format identification signs, one on each façade. Facing the two streets, Central and San Fernando, are projecting ID signs, inserted into the façade in a fashion similar to the window surrounds. Facing the alley and the adjacent parking lot, the ID signs are wall signs, integrated into the overall checkerboard pattern of plaster finishes. Other signs for directional purposes or retail tenants are restricted to a relatively small horizontal band located above the storefronts.

- **Public Art** (GMC 30.37) – Commercial and mixed-use development in Glendale is required to include on-site public art, equal to 2% of project value, subject to review by the Arts & Culture Commission and approval by the City Council. Alternatively, this requirement may be met by paying an amount equivalent to 1% of project value to the City's Urban Art Fund. The applicant has indicated an intention to pay the in-lieu fee.

**Summary Comments, Recommendations and Draft Record of Decision**

"The Link" is located within the Tropico Station district, an emerging mixed-use pedestrian- and transit-oriented neighborhood surrounding the Glendale Larry Zarian Transit Center / Metrolink Station, which also anchors the south end of the San Fernando Road "Creative Corridor." Buildings in Tropico are generally more architecturally eclectic and "edgier" than other areas of Glendale, such as Downtown or the GC3 Campus, and the proposed development follows this recent tradition. Located directly across the street from the Triangle project, "The Link" however, does not try to compete with the Triangle or its landmark "ship's prow" feature created by the acute angle of San Fernando Road and Central Avenue intersection. At five stories, "The Link" is one-story shorter than the Triangle, and the impact of the building's mass is mitigated by rhythmic pattern of the façade design. The façade is articulated by alternating solid masses of color and voids created by glass balconies. Visually evoking musical notation, the glass balconies create a horizontal staff, against which the solid masses are "notes." Like musical notes, the solids vary in height – sometimes reaching from the sidewalk to the top of the building, and sometimes floating at various heights above the storefronts and topping off at various parapet heights. Each of the "notes" is in one of three material finishes and colors. While the materials vary between vertical-arranged metal siding or fiber cement panels, the colors alternate between purple/plum, grey/taupe, or turquoise. Yellow window frames, which echo the yellow façade of the Triangle development across the street, occasionally project beyond the facade. At the corner of San Fernando and Central, the building is "notched" to create a deep setback appropriate for outdoor dining, further enhancing the pedestrian orientation of this transit district.

Except for the addition of detailed landscape, lighting and sign specifications, the project is all but identical to the Stage 1 design unanimously approved on May 14, 2013, and approval of the Final Stage 2 design is recommended without comments or conditions.
At your request, Keyser Marston Associates, Inc. (KMA) has undertaken a review of the feasibility of development of Alternative 2 for The Link project. The Link is a 142-unit residential and 16,200 square foot retail development (Proposed Project) proposed for the western corner of San Fernando Road and Central Avenue. One of the alternatives in the EIR (Alternative 2) contemplates retaining the building facing Central Avenue, and developing 88 residential units and 6,400 square feet of retail space on the remainder of the site. This analysis evaluates the feasibility of the new development portion of Alternative 2 and compares that to the feasibility of the Proposed Project.

PROJECT DESCRIPTIONS

The Proposed Project contemplates the demolition of the commercial building facing Central Avenue and the commercial/industrial building on San Fernando Road. The Proposed Project would have 142 rental residential units, 16,500 square feet of retail space and 244 parking spaces. The developer proposes 108 one-bedroom units and 34 two-bedroom units. Some retail parking will be provided at grade level with the remaining parking provided in two subterranean levels. The retail space will be on the ground floor along with the entrance lobby to the residential units, storage and utility spaces. The one- and two-bedroom rental residential units will be on the second through fifth floors. The developer has also requested a density bonus, so 12 units will be set aside for rental to very low income households.

Alternative 2 contemplates retaining the older building facing Central Avenue. The developer would demolish the commercial/industrial building on San Fernando Road to develop a project with 88 residential units, 6,400 square feet of retail space and 188
To: Gillian van Muyden, City of Glendale

Subject: The Link - Feasibility Review of Alternative 2

November 14, 2013

Page 2

parking spaces. This alternative proposes 56 one-bedroom units and 32 two-bedroom units. This project also will provide parking for the commercial building that is retained. As with the Proposed Project, some retail parking will be provided on the ground floor with the remaining residential and commercial parking provided in two subterranean levels. The retail space will be on the ground floor along with the entrance lobby to the residential units, storage and utility spaces. Rental residential units will be on the second through fifth floors. Given that the developer has requested a density bonus, four units will be set aside to rent to very low income households.

SUMMARY

KMA reviewed conceptual plans and toured the property. There are several things to take into account when evaluating the two versions of development at this site:

- The existing building fronting on Central Avenue is immediately adjacent to the property line. This will make subterranean parking construction more complicated for Alternative 2.
- The building layout for Alternative 2 is less efficient than the Proposed Project, meaning that there is a lower percentage of rentable space to gross space in Alternative 2.
- Alternative 2 has significantly more parking per building square footage than does the Proposed Project.

In preparing this analysis, KMA reviewed the developer’s pro forma, however, KMA primarily relied upon cost, rent and other information in its files. Direct construction costs for the Proposed Project amounted to $24,761,000, as compared to $17,094,000 for Alternative 2, as shown below.

<table>
<thead>
<tr>
<th></th>
<th>Proposed Project</th>
<th>Alternative 2</th>
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<tbody>
<tr>
<td>Direct Costs</td>
<td>$24,761,000</td>
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<td>Indirect Costs</td>
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<td>$34,004,000</td>
<td>$22,848,000</td>
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When indirect and financing costs are included, total development costs for the Proposed Project are $34,004,000, and for Alternative 2 they are $22,848,000.
KMA reviewed rents at new apartment projects in Glendale. This location is inferior to those residential projects and this project has fewer amenities. Based on that, KMA assumed market rents of $1,750 per month for the one-bedroom units and $2,050 per month for the two-bedroom units. Commercial market rents were assumed at $2.50 per square foot per month. As noted above, Alternative 2 is a less efficient layout. In addition, retaining the existing building on Central Avenue eliminates several higher valued rental units and commercial space. For Alternative 2, KMA estimated monthly rents at $1,725 for one-bedroom units, $2,025 for two-bedroom units, and $2.25 per square foot for the commercial space.

Taking operating expenses into account, the net operating income for the Proposed Project is estimated at $2,159,000 for the Proposed Project and $1,281,000 for Alternative 2. Based on these levels of income, KMA estimated the value of the Proposed Project at $44,466,000 and Alternative 2 at $27,192,000.

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<th>Proposed Project</th>
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<td>(4,447,000)</td>
<td>(2,719,000)</td>
</tr>
<tr>
<td>Residual Land Value</td>
<td>$6,015,000</td>
<td>$1,625,000</td>
</tr>
</tbody>
</table>

KMA estimated the residual land value by deducting Total Development Costs and a pro forma 10% developer profit from the project value. As shown above, the residual land value is $6,015,000 for the Proposed Project and $1,625,000 for Alternative 2. These amounts represent how much a developer would be willing to pay for the properties in order to undertake the project.

<table>
<thead>
<tr>
<th></th>
<th>Proposed Project</th>
<th>Alternative 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Value</td>
<td>$44,466,000</td>
<td>$27,192,000</td>
</tr>
<tr>
<td>Less Total Development Costs</td>
<td>(34,004,000)</td>
<td>(22,848,000)</td>
</tr>
<tr>
<td>Less Current Land Value</td>
<td>(5,100,000)</td>
<td>(3,300,000)</td>
</tr>
<tr>
<td>Estimated Developer Profit</td>
<td>$5,362,000</td>
<td>$1,044,000</td>
</tr>
<tr>
<td>Profit Margin (% of value)</td>
<td>12.1%</td>
<td>3.8%</td>
</tr>
</tbody>
</table>

Another measure of feasibility is to look at the profit a developer can earn. In this case total development costs and land costs are deducted from value to estimate developer
profit. As shown above, the Proposed Project has a $5,362,000 profit and a 12.1% profit margin; Alternative 2 has a $1,044,000 profit and 3.8% profit margin.

A typical developer would undertake this project if the residual land value is greater than the actual land cost or value, and if the developer can earn a 10% profit or greater. By those measures, the Proposed Project represents a feasible project. The returns on Alternative 2, however, are substantially below these thresholds. A typical developer would not consider Alternative 2 to be a feasible project, particularly since the developer could continue the current uses on the property.

ANALYSIS

KMA has prepared a pro forma analysis of the Proposed Project and Alternative 2. As part of its analysis, KMA met with the developer and reviewed the developer’s pro forma for both alternatives. KMA was also provided with architectural renderings and project detail prepared by the developer’s architect. KMA also walked the exterior of the property with the developer.

The pro forma analyses are included as attachments. The Proposed Project is provided in Attachment A and Alternative 2 in Attachment B.

KMA has undertaken a number of recent analyses of four- and five-story residential, or residential and commercial projects in the last two years. The cost assumptions used in this analysis utilize those previous cost assumptions.

In reviewing the conceptual plans and in walking the property, KMA has the following observations with respect to Alternative 2 as compared to the Proposed Project:

- Construction of the subterranean parking for Alternative 2 will be somewhat more complicated due to shoring and support requirements to protect the building that remains.
- The building and unit layout for Alternative 2 is somewhat less efficient than the Proposed Project, meaning that there is a higher percentage of circulation and other non-rentable space in Alternative 2.
- Alternative 2 has a higher proportion of parking to rentable space because it is providing parking for the remaining building.
To: Gillian van Muyden, City of Glendale
Subject: The Link - Feasibility Review of Alternative 2

Development Costs

Direct Costs

The direct costs are estimated as follows:

1. KMA estimated the on- and off-site improvement costs at $10.00 per square foot of gross building area (GBA). They amount to $1,337,000 for the Proposed Project and $894,000 for Alternative 2.

2. KMA estimated the building costs at $90 per square foot of gross building area (GBA) for the residential and retail components. Tenant improvement costs for the retail space are estimated at $30 per square foot.

3. Parking costs vary by how the parking is configured. Given the relatively small size of the parcel, KMA has estimated that the ground level (podium level) parking will cost $15,000 per space; the first subterranean level $25,000 per space; and the second subterranean level $35,000 per space.

4. Allowances for General Contractor fees and General Conditions, builder's risk insurance, and construction contingency are assumed at 14.0%, 2.0% and 5%, respectively, of direct costs.

As shown in Table 1 of each attachment, Total Direct Costs for the Proposed Project are estimated at $24,761,000 and for Alternative 2, $17,094,000.

Indirect Costs

The indirect costs are estimated as follows:

1. KMA estimated the architecture, engineering and consulting costs at 6.0% of direct costs.

2. KMA estimated an allowance for public permits and fees at $13,183 per unit for the Proposed Project and $12,705 per unit for Alternative 2. The costs include fees for the retail space. The Alternative 2 costs are slightly less per unit because, among other things, the retail space represents a lower percentage of total space as compared to the Proposed Project.

3. KMA estimated the taxes, legal and accounting costs at 2.0% of total direct costs.
4. KMA estimated the marketing costs at 2.0% of total direct costs.

5. KMA provided an allowance for developer overhead and management at 5.0% of total direct costs.

6. KMA included an indirect cost contingency allowance equal to 5% of indirect costs.

As shown in Table 1 of each attachment, Total Indirect Costs for the Proposed Project are estimated at $5,865,000 and for Alternative 2, $3,867,000.

**Financing Costs**

KMA estimated the financing costs as follows:

1. Land interest rate was assumed at 5.5%; the construction period was assumed to be 12 months and lease up nine months; the average outstanding balance was assumed at 100% during construction and lease up.

2. Construction interest was assumed at 5.5%; the construction period was assumed to be 12 months and lease up nine months; the average outstanding balance was assumed at 65% during construction and 100% during lease up.

3. Loan origination fees for the construction loan and the permanent loan were assumed at 1.0% each.

As shown in Table 1 of each attachment, Total Indirect Costs for the Proposed Project are estimated at $3,378,000 and for Alternative 2, $1,887,000.

Total development costs are $34,004,000 for the Proposed Project and $22,848,000 for Alternative 2, as shown below.

<table>
<thead>
<tr>
<th></th>
<th>Proposed Project</th>
<th>Alternative 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Direct Costs</td>
<td>$24,761,000</td>
<td>$17,094,000</td>
</tr>
<tr>
<td>Indirect Costs</td>
<td>$5,865,000</td>
<td>$3,867,000</td>
</tr>
<tr>
<td>Financing Costs</td>
<td>$3,378,000</td>
<td>$1,887,000</td>
</tr>
<tr>
<td><strong>Total Development Costs</strong></td>
<td><strong>$34,004,000</strong></td>
<td><strong>$22,848,000</strong></td>
</tr>
</tbody>
</table>
To: Gillian van Muyden, City of Glendale
Subject: The Link - Feasibility Review of Alternative 2

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Page 7

Net Operating Income

In addition to discussing potential rents and revenue with the Developer, KMA also reviewed rents at new apartment projects in Glendale. The projects examined are in central Glendale, on Orange, Colorado and Broadway. Each of these projects has a superior location and greater on-site amenities (e.g. pool, fitness and community room). Therefore, KMA assumed lower rents for this location as compared to the comparable locations.

Rental Income

For the Proposed Project, KMA assumed on average that the one-bedroom units could rent for $1,750 per month and the two-bedroom units for $2,050 per month. Alternative 2 has a greater proportion of interior facing units as compared to the Proposed Project. Therefore, KMA assumed that rents would average slightly less in this alternative, $1,725 per month for the one-bedroom units and $2,025 for the two-bedroom units.

As noted previously, the developer has requested a density bonus, therefore, some units would be set aside for very low income tenants. The Proposed Project was assumed to have nine one-bedroom units renting for $614 per month and three two-bedroom units renting for $686 per month. In Alternative 2, the very low income requirements are two one-bedroom units and two two-bedroom units.

Retail/commercial rents for the area are estimated at $2.50 per square foot per month on a triple net basis, meaning that operating expenses are passed through to the tenant. This rate was utilized for the Proposed Project. As noted previously, Alternative 2 has an inferior retail/commercial layout. Rent was assumed at $2.25 per square foot.

Assuming a 5% vacancy and collection factor, Effective Gross Income was estimated at $3,248,000 per year for the Proposed Project and $1,948,000 for Alternative 2, as shown in Table 2 of each Attachment.

Operating Expenses

General operating expenses for the rental units are estimated at $3,500 per unit per year. Management fees for residential and commercial projects range from 4.0% to 6.0% of effective gross income for small to medium sized projects. KMA has assumed that the management fee would be 5.0%. Capital reserves for the residential units are assumed to be $150 per unit per year. Property taxes are based on project value. The residential property taxes are estimated at approximately $2,880 per unit for the Proposed Project and $2,824 for Alternative 2.
Total Operating Expenses for the Proposed Project are estimated at $1,089,000 and $667,000 for Alternative 2. Net operating income (revenues minus expenses) is estimated at $2,159,000 for the Proposed Project and $1,281,000 for Alternative 2, as shown in Table 2 of each attachment.

Project Returns

KMA examined the projects from two perspectives, the residual land value approach and the developer profit approach. In the first, the project is evaluated without considering the value of land, taking into account a reasonable profit for the developer. This approach provides an estimate of what the land is worth for the various alternatives. In the second approach, the land costs are considered as a cost and the amount of profit that a developer can earn is measured. Both approaches make use of the development costs and revenues discussed above.

In both cases, the net operating income for each alternative is capitalized by the weighted average capitalization rate for the residential and commercial components (4.5% and 7.0%, respectively). For the Proposed Project the capitalization rate is 4.9% and the capitalization rate for Alternative 2 is 4.7%. The capitalization rate is lower for Alternative 2 because the commercial component is a smaller percentage of overall income than is the case for the Proposed Project. It should also be noted that a lower capitalization rate results in a higher value.

For the Proposed Project, the 4.9% capitalization rate applied to the $2,159,000 net operating income results in a value of $44,466,000, as shown in Table 3 of Attachment A. For Alternative 2, the $1,281,000 net operating income generates a value of $27,192,000.

<table>
<thead>
<tr>
<th>Proposed Project</th>
<th>Alternative 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Value</td>
<td>$44,466,000</td>
</tr>
<tr>
<td>Less Total Development Costs</td>
<td>(34,004,000)</td>
</tr>
<tr>
<td>Less Developer Profit @ 10%</td>
<td>(4,447,000)</td>
</tr>
<tr>
<td>Residual Land Value</td>
<td>$6,015,000</td>
</tr>
</tbody>
</table>

Development costs and a 10% developer profit are deducted to estimate the residual land value, which represents how much a typical developer would pay for the property and have a feasible project. As shown above for the Proposed Project, deducting the $34,004,000 development cost and a $4,447,000 developer profit yields a $6,015,000 value.
To: Gillian van Muyden, City of Glendale

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land value. For Alternative 2, deducting $22,848,000 of development costs and $2,719,000 of profit yields a residual land value of $1,625,000.

In the second method, the development costs and the current land cost or land value is deducted from the value of the completed project to estimate the developer profit. As shown below, the estimated profits for the Proposed Project and Alternative 2 are $5,362,000 and $1,044,000, respectively.

<table>
<thead>
<tr>
<th>Proposed Project</th>
<th>Alternative 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Value</td>
<td>$44,466,000</td>
</tr>
<tr>
<td>Less Total Development Costs</td>
<td>(34,004,000)</td>
</tr>
<tr>
<td>Less Current Land Value</td>
<td>(5,100,000)</td>
</tr>
<tr>
<td>Estimated Developer Profit</td>
<td>$5,362,000</td>
</tr>
<tr>
<td>Profit Margin (% of value)</td>
<td>12.1%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Proposed Project</th>
<th>Alternative 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Value</td>
<td>$27,192,000</td>
</tr>
<tr>
<td>Less Total Development Costs</td>
<td>(22,848,000)</td>
</tr>
<tr>
<td>Less Current Land Value</td>
<td>(3,300,000)</td>
</tr>
<tr>
<td>Estimated Developer Profit</td>
<td>$1,044,000</td>
</tr>
<tr>
<td>Profit Margin (% of value)</td>
<td>3.8%</td>
</tr>
</tbody>
</table>

It is KMA's understanding that the developer acquired the larger parcel on San Fernando Road in the last couple of years at a price of $3,300,000. This is the parcel on which the Alternative 2 project is located. KMA utilized this land value for Alternative 2. The building fronting Central Avenue was purchased a number of years ago, so the purchase price likely understates its current value. KMA reviewed rental income for the occupied and vacant space. KMA considered expenses to be borne by the owner, lack of parking and building condition. KMA estimates that the building might have a value of between $1,600,000 and $2,000,000. For purposes of this analysis, KMA has assumed that the building is worth $1,800,000. Therefore, the land cost for the Proposed Project is $5,100,000 and the value for Alternative 2 is $3,300,000.

CONCLUSIONS

For the Proposed Project, the 12.1% profit margin is greater than a typical developer's required 10.0% margin. In addition, the residual land value is $6,015,000 which is greater than the $5,100,000 estimated value of the larger property. This indicates that the Proposed Project is a feasible project.

On the other hand, the residual land value for Alternative 2 is only $1,625,000, approximately half of the current value of the property. In addition, the 3.8% profit margin is substantially below the 10.0% margin that a typical developer would require. Taking this into account a typical developer would not pursue this project and would retain the site in its current condition. Given that option, Alternative 2 does not represent an economically viable alternative.
ATTACHMENT A

PROPOSED DEVELOPMENT

PRO FORMA ANALYSIS
### ATTACHMENT A - TABLE 1

**ESTIMATED DEVELOPMENT COSTS**

**PROPOSED DEVELOPMENT: TYPE V CONSTRUCTION**

142 APARTMENT UNITS & 16,200 SF GROUND FLOOR RETAIL SPACE

THE LINK MIXED-USE PROJECT

GLENDALE, CALIFORNIA

---

<table>
<thead>
<tr>
<th>I. Direct Costs</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Site Improvement Costs</strong></td>
<td>133,702 Sf GBA</td>
<td>$10.00 /sf GBA</td>
<td>$1,337,000</td>
<td></td>
</tr>
<tr>
<td><strong>Parking Costs</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Surface Parking</td>
<td>0 Spaces</td>
<td>$1,000 /Space</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Podium Parking</td>
<td>47 Spaces</td>
<td>$15,000 /Space</td>
<td>705,000</td>
<td></td>
</tr>
<tr>
<td>1st Level Subterranean</td>
<td>114 Spaces</td>
<td>$28,000 /Space</td>
<td>2,800,000</td>
<td></td>
</tr>
<tr>
<td>2nd Level Subterranean</td>
<td>83 Spaces</td>
<td>$36,000 /Space</td>
<td>2,918,000</td>
<td></td>
</tr>
<tr>
<td><strong>Residential Building Costs</strong></td>
<td>117,502 Sf Residential GBA</td>
<td>$80 /sf Residential GBA</td>
<td>10,575,000</td>
<td></td>
</tr>
<tr>
<td><strong>Retail Building Costs</strong></td>
<td>16,200 Sf Retail GBA</td>
<td>$50 /sf Retail GBA</td>
<td>1,468,000</td>
<td></td>
</tr>
<tr>
<td><strong>Retail Tenant Improvement Costs</strong></td>
<td>16,200 Sf Retail GBA</td>
<td>$30 /sf Retail GBA</td>
<td>486,000</td>
<td></td>
</tr>
<tr>
<td><strong>Contractor Fees/General Requirements</strong></td>
<td>14.0% Construction Costs</td>
<td>2,848,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Builder's Risk Insurance</strong></td>
<td>2.0% Construction Costs</td>
<td>407,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Contingency Allowance</strong></td>
<td>5.0% Other Direct Costs</td>
<td>1,179,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total Direct Costs</strong></td>
<td>142 Units</td>
<td>$174,400 /Unit</td>
<td>$24,781,000</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>II. Indirect Costs</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Architecture, Engineering &amp; Consulting</strong></td>
<td>6.0% Direct Costs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Public Permits &amp; Fees</strong></td>
<td>133,702 Sf GBA</td>
<td>$13,183 /Unit</td>
<td>1,872,000</td>
<td></td>
</tr>
<tr>
<td><strong>Taxes, Ins, Legal &amp; Accdg</strong></td>
<td>2.0% Direct Costs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Marketing &amp; Leasing Costs</strong></td>
<td>2.0% Direct Costs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Development Management</strong></td>
<td>5.0% Direct Costs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Contingency Allowance</strong></td>
<td>5.0% Other Indirect Costs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total Indirect Costs</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>III. Financing Costs</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Interest During Construction</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Land Assembly Costs</td>
<td>3</td>
<td>$5,100,000 Financed</td>
<td>5.50% Interest</td>
<td>$224,000</td>
</tr>
<tr>
<td>Construction Costs</td>
<td>4</td>
<td>$43,004,000 Financed</td>
<td>6.50% Interest</td>
<td>2,625,000</td>
</tr>
<tr>
<td>Loan Origination Fees</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Construction Loan</td>
<td>5</td>
<td>$34,004,000 Financed</td>
<td>1.00 Points</td>
<td>340,000</td>
</tr>
<tr>
<td>Permanent Loan</td>
<td>5</td>
<td>$28,903,000 Financed</td>
<td>1.00 Points</td>
<td>289,000</td>
</tr>
<tr>
<td><strong>Total Financing Costs</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| IV. Total Development Cost | 142 Units | $239,600 /Unit | $34,004,000 |

---

1. Direct costs assume prevailing wage requirements will not be imposed on the Project. KMA assumes Type V construction standards for this Alternative.

2. Based on 1.39 spaces per residential unit and 2.90 spaces per 1,000 square feet of retail space.

3. Assumes an 12-month construction period with a 100% average outstanding balance, and a 9-month lease-up period with a 100% average outstanding balance.

4. Assumes an 12-month construction period with a 60% average outstanding balance, and a 9-month lease-up period with a 100% average outstanding balance.

5. Assumes a 4.50% capitalization rate and a 65% loan-to-value ratio. Capitalization rate based on RERC data.
ATTACHMENT A - TABLE 2

STABILIZED NET OPERATING INCOME
PROPOSED DEVELOPMENT: TYPE V CONSTRUCTION
142 APARTMENT UNITS & 16,200 SF GROUND FLOOR RETAIL SPACE
THE LINK MIXED-USE PROJECT
GLENDALE, CALIFORNIA

I. Rental Income

<table>
<thead>
<tr>
<th>Type</th>
<th>Units</th>
<th>Rent per Unit/Month</th>
<th>Gross Income</th>
<th>(Less) Vacancy &amp; Collection Allowance</th>
<th>Effective Gross Income</th>
</tr>
</thead>
<tbody>
<tr>
<td>One Bedroom Market</td>
<td>99</td>
<td>$1,750</td>
<td>$2,079,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>One Bedroom Very Low Income</td>
<td>9</td>
<td>$614</td>
<td>$66,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Two Bedroom Market</td>
<td>31</td>
<td>$2,050</td>
<td>$763,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Two Bedroom Very Low Income</td>
<td>3</td>
<td>$886</td>
<td>$25,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Retail Rent</td>
<td>16,200 Sf</td>
<td>$2.50 /Sf/Month</td>
<td>$488,000</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

II. Operating Expenses

<table>
<thead>
<tr>
<th>Type</th>
<th>Units</th>
<th>Expenses per Unit/Month</th>
<th>Operating Expenses</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Operating Expenses</td>
<td>142</td>
<td>$3,500</td>
<td>$497,000</td>
</tr>
<tr>
<td>Management Fee</td>
<td></td>
<td>5% Effective Gross Income</td>
<td>182,000</td>
</tr>
<tr>
<td>Property Taxes</td>
<td>142</td>
<td>$2,880</td>
<td>409,000</td>
</tr>
<tr>
<td>Capital Reserve</td>
<td>142</td>
<td>$150</td>
<td>21,000</td>
</tr>
<tr>
<td>Total Operating Expenses</td>
<td>142</td>
<td>$7,870</td>
<td>$1,089,000</td>
</tr>
</tbody>
</table>

III. Stabilized Net Operating Income

| Stabilized Net Operating Income | $2,169,000 |

1 Based on a weighted average rent of $2.33 per square foot per month.

2 Excludes the operating expenses for the retail space. These costs are assumed to be recouped from CAM charges assessed to the tenants.
## ATTACHMENT A - TABLE 1

### ESTIMATED LAND VALUE

**PROPOSED DEVELOPMENT: TYPE V CONSTRUCTION**  
142 APARTMENT UNITS & 16,200 SF GROUND FLOOR RETAIL SPACE  
**THE LINK MIXED-USE PROJECT**  
**GLENDALE, CALIFORNIA**

<table>
<thead>
<tr>
<th>I. Estimated Project Value</th>
<th>$2,159,000</th>
<th>4.3%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Estimated Project Value</td>
<td>$44,466,000</td>
<td></td>
</tr>
<tr>
<td>II. Developer Profit</td>
<td>10% of Value</td>
<td>$4,447,000</td>
</tr>
<tr>
<td>III. Estimated Land Value</td>
<td>$44,466,000</td>
<td>(34,004,000)</td>
</tr>
<tr>
<td>Estimated Current Site Value</td>
<td>$5,100,000</td>
<td>(5,100,000)</td>
</tr>
<tr>
<td>Estimated Developer Profit</td>
<td>$44,466,000</td>
<td>(34,004,000)</td>
</tr>
<tr>
<td>Developer Profit</td>
<td>12.1% of Value</td>
<td>$5,362,000</td>
</tr>
<tr>
<td>142 Units</td>
<td>$37,761/Unit</td>
<td></td>
</tr>
</tbody>
</table>

Based on a weighted average of a 4.5% capitalization rate for the apartment component and a 7.0% capitalization rate for the retail component.

Prepared by: Kayser Marston Associates, Inc.
Filename: Link fees 142; Type V
ATTACHMENT B

ALTERNATIVE DEVELOPMENT

PRO FORMA ANALYSIS
ATTACHMENT B - TABLE 1

ESTIMATED DEVELOPMENT COSTS
ALTERNATIVE DEVELOPMENT: TYPE V CONSTRUCTION
88 APARTMENT UNITS & 6,400 SF GROUND FLOOR RETAIL SPACE
THE LINK MIXED-USE PROJECT
GLENDALE, CALIFORNIA

<table>
<thead>
<tr>
<th>I. Direct Costs</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Site Improvement Costs</td>
<td>89,434 SF GBA</td>
</tr>
<tr>
<td>Parking Costs</td>
<td>2</td>
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<tr>
<td>Surface Parking</td>
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</tr>
<tr>
<td>Podium Parking</td>
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<tr>
<td>1st Level Subterranean</td>
<td>76 Spaces</td>
</tr>
<tr>
<td>2nd Level Subterranean</td>
<td>68 Spaces</td>
</tr>
<tr>
<td>Residential Building Costs</td>
<td>83,034 SF Residential GBA</td>
</tr>
<tr>
<td>Retail Building Costs</td>
<td>6,400 SF Retail GBA</td>
</tr>
<tr>
<td>Contractor Fees/General Requirements</td>
<td>14.0% Construction Costs</td>
</tr>
<tr>
<td>Builder’s Risk Insurance</td>
<td>2.0% Construction Costs</td>
</tr>
<tr>
<td>Contingency Allowance</td>
<td>5.0% Other Direct Costs</td>
</tr>
<tr>
<td>Total Direct Costs</td>
<td>88 Units</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>II. Indirect Costs</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Architecture, Engineering &amp; Consulting</td>
<td>5.0% Direct Costs</td>
</tr>
<tr>
<td>Public Permits &amp; Fees</td>
<td>89,434 SF GBA</td>
</tr>
<tr>
<td>Texas, Inc., Legal &amp; Acclg</td>
<td>2.0% Direct Costs</td>
</tr>
<tr>
<td>Marketing &amp; Leasing Costs</td>
<td>2.0% Direct Costs</td>
</tr>
<tr>
<td>Development Management</td>
<td>5.0% Direct Costs</td>
</tr>
<tr>
<td>Contingency Allowance</td>
<td>5.0% Other Indirect Costs</td>
</tr>
<tr>
<td>Total Indirect Costs</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>III. Financing Costs</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Interest During Construction</td>
<td>3</td>
</tr>
<tr>
<td>Land Assembleage Costs</td>
<td>$3,300,000 Financed</td>
</tr>
<tr>
<td>Construction Costs</td>
<td>$22,848,000 Financed</td>
</tr>
<tr>
<td>Loan Origination Fees</td>
<td></td>
</tr>
<tr>
<td>Construction Loan</td>
<td>$22,848,000 Financed</td>
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<tr>
<td>Permanent Loan</td>
<td>$17,675,000 Financed</td>
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<td>Total Financing Costs</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>IV. Total Development Cost</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>88 Units</td>
<td>$269,600 /Unit</td>
</tr>
</tbody>
</table>

1. Direct costs assume prevailing wage requirements will not be imposed on the Project. KMA assumes Type V construction standards for this Alternative.
2. Based on 1.38 spaces per residential unit and 10.31 spaces per 1,000 square feet of retail space.
3. Assumes an 12-month construction period with a 100% average outstanding balance, and a 6-month lease-up period with a 100% average outstanding balance.
4. Assumes an 12-month construction period with a 60% average outstanding balance, and a 6-month lease-up period with a 100% average outstanding balance.
5. Assumes a 4.50% capitalization rate and a 85% loan-to-value ratio. Capitalization rate based on RERC data.

Prepared by: Keyser Marston Associates, Inc.
Filename: Link feas 88; Type V
### ATTACHMENT B - TABLE 2

**STABILIZED NET OPERATING INCOME**  
**ALTERNATIVE DEVELOPMENT: TYPE V CONSTRUCTION**  
**88 APARTMENT UNITS & 6,400 SF GROUND FLOOR RETAIL SPACE**  
**THE LINK MIXED-USE PROJECT**  
**GLENDALE, CALIFORNIA**

<table>
<thead>
<tr>
<th>I. Rental Income</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>One Bedroom Market</td>
<td>54 Units</td>
<td>$1,725 /Unit/Month</td>
<td>$1,118,000</td>
<td></td>
</tr>
<tr>
<td>One Bedroom Low Income</td>
<td>2 Units</td>
<td>$914 /Unit/Month</td>
<td>$15,000</td>
<td></td>
</tr>
<tr>
<td>Two Bedroom Market</td>
<td>30 Units</td>
<td>$2,025 /Unit/Month</td>
<td>$723,000</td>
<td></td>
</tr>
<tr>
<td>Two Bedroom Low Income</td>
<td>2 Units</td>
<td>$686 /Unit/Month</td>
<td>$18,000</td>
<td></td>
</tr>
<tr>
<td>Retail Rent</td>
<td>8,400 Sf</td>
<td>$2.25 /Sqft/Month</td>
<td>173,000</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>II. Operating Expenses</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>General Operating Expenses</td>
<td>88 Units</td>
<td>$3,500 /Unit</td>
<td>$308,000</td>
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</tr>
<tr>
<td>Management Fee</td>
<td>5% Effective Gross Income</td>
<td>$97,000</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Property Taxes</td>
<td>88 Units</td>
<td>$2,024 /Unit</td>
<td>249,000</td>
<td></td>
</tr>
<tr>
<td>Capital Reserve</td>
<td>88 Units</td>
<td>$150 /Unit</td>
<td>13,000</td>
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<tr>
<td>Total Operating Expenses</td>
<td>88 Units</td>
<td>$7,680 /Unit</td>
<td>$987,000</td>
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</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>III. Stabilized Net Operating Income</th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>88 Units</td>
<td>$1,281,000</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

---

1. Based on a weighted average rent of $2.30 per square foot per month.

2. Excludes the operating expenses for the retail space. These costs are assumed to be recouped from CAM charges assessed to the tenants.

Prepared by: Keyser Marston Associates, Inc.
Filename: Link feas 88; Type V
ATTACHMENT B - TABLE 3

ESTIMATED LAND VALUE

ALTERNATIVE DEVELOPMENT: TYPE V CONSTRUCTION
88 APARTMENT UNITS & 6,400 SF GROUND FLOOR RETAIL SPACE
THE LINK MIXED-USE PROJECT
GLENDALE, CALIFORNIA

<table>
<thead>
<tr>
<th>I. Estimated Project Value</th>
<th>$1,281,000</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stabilized Net Operating Income</td>
<td></td>
</tr>
<tr>
<td>Capitalization Rate</td>
<td>4.7%</td>
</tr>
<tr>
<td>Estimated Project Value</td>
<td>$27,192,000</td>
</tr>
</tbody>
</table>

| II. Developer Profit | 10% of Value | $2,719,000 |

<table>
<thead>
<tr>
<th>III. Estimated Land Value</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Estimated Project Value</td>
<td>$27,192,000</td>
</tr>
<tr>
<td>(Less) Total Development Cost</td>
<td>(22,848,000)</td>
</tr>
<tr>
<td>(Less) Developer Profit</td>
<td>(2,719,000)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>IV. Estimated Land Value</th>
<th>33,977 Sf Land</th>
<th>$48 /Sf Land</th>
<th>$1,225,000</th>
</tr>
</thead>
<tbody>
<tr>
<td>88 Units</td>
<td>$18,600 /Unit</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Estimated Project Value
Stabilized Net Operating Income | $1,281,000 |
Capitalization Rate | 4.7% |
Estimated Project Value | $27,192,000 |
Estimated Current Site Value | $3,300,000 |

Estimated Developer Profit
Estimated Project Value | $27,192,000 |
(less) Total Development Cost | (22,848,000) |
(less) Current Site Value | (3,300,000) |
Developer Profit | 3.0% of Value | $1,044,000 |
88 Units | $11,564 /Unit |

* Based on a weighted average of a 4.5% capitalization rate for the apartment component and a 7.0% capitalization rate for the retail component.

Prepared by: Keyser Marston Associates, Inc.
Filename: Link feas 88; Type V
EXHIBIT 5.

FINDINGS OF FACT FOR CONDITIONAL USE PERMIT (per the Glendale Municipal Code, Title 30.42.030), a conditional use permit shall be granted only if each of the following four findings exists:

A. How will the proposed use be consistent with the various elements and objectives of the General Plan?

The subject site is located within the IMU-R (Industrial/Commercial-Residential Mixed Use) Zone and the proposal is to construct a new 5-story building containing retail/commercial spaces on the ground floor and 142 multi-family residential dwelling units on the upper floors. The conditional use permit application is to allow the construction of multiple family residential dwelling units in the IMU-R Zone, since this land use is not permitted by right in this zoning designation.

This zone permits a variety of land uses including institutional, industrial/manufacturing-processing, retail/commercial, service-related, and office uses and are consistent with the Zoning Code. The proposed uses are consistent with the zoning designation and the existing surrounding uses. The Land Use designation of the subject site is Mixed Use. Both the zoning and land use designations are consistent and permit proposed development.

The scope of the EIR review generally overlaps with each element of the General Plan, such as circulation, housing, land use, noise, safety, open space and conservation, and historic preservation.

No major impacts were identified, with the exceptions of short-term noise/vibration impacts during the construction phase and long-term solid waste and recreational impacts, if the project is implemented.

Due to the project’s strategic location near the Glendale Transportation Center, the proposed mixed-use project also meets the City’s goal of creating transit-oriented development.

B. Why will the proposed use and its associate structures and facilities not be detrimental to the public health, safety, or general welfare, or to the environment?

The proposed project contains a mix of retail/commercial uses and multi-family residential dwelling units. These land uses are permitted within the IMU-R zoning district and are similar to other businesses in the surrounding area.

The EIR completed and certified for this project found no impacts tied to the project level except for parks and recreation. The Statement of Overriding Considerations approved for the project indicates that the impact has been mitigated to the maximum extent feasible and that the project benefits outweigh its impacts, and that the project is in conformance with the City’s
General Plan. Therefore, the use is not considered detrimental to the public health, safety and general welfare or to the environment.

C. Why will the proposed use and facilities not adversely affect or conflict with adjacent uses or impede the normal development of surrounding property?

The proposed LINK project is a 5-story mixed-use development consisting of retail/commercial uses on the ground floor and residential dwelling units on floors 2-5. These mix of uses are similar to the existing condition, where there are currently retail, office, and residential in a two-story building.

The proposed retail/commercial uses are permitted within the IMU-R zoning district and are consistent with other uses in the area. Some of the uses surrounding the subject site include various retail/service establishments, general and medical offices, a hospital, a veterinarian clinic, restaurants, and industrial/manufacturing type businesses.

The surrounding area is also developed with a variety of housing options, including single-family homes, multi-family residential buildings, such as the Glendale Triangle Camden project (under construction), and SRO (single-room occupancy) hotel.

While the LINK project will be larger than most developments in the area, with the exception of the Glendale Triangle Camden project and the Glendale Memorial Hospital, the various uses in the proposed project already exist in the same zoning district and are consistent with and will complement these existing businesses.

The multi-family residential dwelling units are permitted with an approved conditional use permit. The CUP helps ensure any negative impacts, if any will be mitigated to an acceptable through conditions or other measures. This process requires a public hearing and allows for public input. No use variances are proposed with the project.

Any proposed project is reviewed on a case-by-case basis and is subject to the requirements of the underlying zoning designation of the property. Development of the LINK project will not prevent or impede development or improvements to adjoining or nearby properties.

D. Explain how adequate public and private facilities such as utilities, landscaping, parking spaces and traffic circulation measures are or will be provided for the proposed use.

The subject site is located in a developed and densely populated urban setting of south Glendale. The site is currently served by improved streets as well as public and private utilities, including sewer.

The project will provide a total of 244 parking spaces for all retail/commercial, office, and residential uses. The Zoning Code only requires 219 spaces after
implementation of SB 1818 and the Project exceeds the required parking by 25 spaces. The number of proposed parking spaces meet Code based on square footage of retail/commercial space and the number of residential dwelling units.

Access to loading and the on-grade retail parking will be provided off of San Fernando Road. Two more access points to the subterranean garage are provided from the public alley at the rear of the building. Traffic circulation was reviewed by Traffic and Transportation Division to ensure compliance with traffic-related measures for the project area.

For applications for new multi-family residential uses proposed to be located within the IMU-R zone, the following four questions must be answered.

1. **How does the proposed multi-family development comply with all other applicable provisions and performance standards identified in the City of Glendale Zoning Ordinance and Municipal Code?**

The proposed mixed-use project will consist of retail and commercial uses on the ground floor and 142 residential dwelling units on the upper floors. These uses are permitted in the IMU-R zoning district and are consistent with existing uses in the surrounding area. Additionally, all new uses will be reviewed for compliance with the Zoning Code and the general provisions of the performance standards.

As for the other performance standards related to air quality, including visible emissions, dust, odors, as well as waste and contaminants, vibration, and noise have been reviewed in the project EIR. The proposed project would not result in any significant, long-term impacts relating to the aforementioned areas as determined by the EIR. However, there will be short term noise and vibration impacts in the initial construction phase due to excavation and pile driving for the podium level and subterranean parking garage. The noise and vibration generated from these construction activities are temporary and will subside upon completion of that phase.

Overall, land uses that are permitted within the IMU-R zoning districts are low intensity and do not rise to the level that would violate the specified performance standards.

2. **Will the proposed multi-family housing development result in the displacement of existing, or limit future employment on the subject site or on surrounding sites?**

The proposed mixed-use project will provide 142 new multi-family residential units. There is currently one residential unit on the second floor of the 2-story building; other uses in the existing buildings are retail or service-related. The existing tenants will be displaced, but could return upon the completion of the building.
The new project will provide approximately 16,200 square feet of combined, retail/office/studio space on the ground floor. The retail component is intended to provide a range of goods and services to the residents of the new building and surrounding area. These uses will also complement and add to the existing mix of businesses.

The proposed retail/commercial/office space will create new employment opportunities in the area. While the retail tenants have not been identified, depending on the mix of businesses, the project may have the potential to create more employment opportunities than the existing businesses on site.

3. How is the subject site physically suitable for the type and density/intensity of the proposed multi-family housing development?

The rectangular-shaped site has a flat topography and is presently development with one- and two-story commercial buildings. The site is approximately 1.05-acres and will combine four adjoining lots. The proposed 142 dwelling units is the maximum density level permitted by the Zoning Code in conjunction with provisions of SB 1818.

The proposed density is achieved through thoughtful design as well as the natural features of the lot, which make the subject site less challenging to develop.

4. How will the proposed multi-family housing development be compatible with the surrounding existing and future land uses allowed in the IMU-R zoning district?

The intent of the zoning designation of the IMU-R zone is to encourage larger scale development that will provide a range of goods and services to neighborhoods located along portions of the industrial/commercial thoroughfares. The proposed mixed-use project is consistent with that objective as it will provide a mix of different retail/commercial uses on the ground floor along with multi-family residential dwellings on the upper floors. These uses already exist in the neighborhood. The proposed uses, existing uses, and future land uses will continue to be compatible since they must comply with the underlying zoning requirements.

The proposed project will provide the momentum and encourage other projects like it to be developed in the area. Over time and through the zoning regulations of the area, it is anticipated that this area of south Glendale will provide an attractive, vibrant, and varied housing options that is matched with an equally vibrant business community. The area's proximity to the Glendale Transportation Center also gives this neighborhood an added benefit for transit-oriented development.
Approval of the Sign Program and Conditional Use Permit shall be subject to the following conditions:

1. That the project shall be in substantial accord with the plans submitted with the application and presented to the City Council at the public hearing except for any modifications as may be required to meet specific Code standards or other conditions stipulated herein to the satisfaction of the Director of Community Development.

2. That all necessary permits, including individual sign permit and encroachment permits, shall be obtained from the City and all construction shall be in compliance with the Glendale Building code and all other applicable regulations.

3. That access to the premises shall be made available to all City of Glendale Community Development Department, Neighborhood Services Division, Police Department, and Fire Department staff upon request for the purpose of verifying compliance with all laws and the conditions of this approval.

4. A Density Bonus Housing Agreement and Housing Plan shall be submitted to be reviewed and approved by the Director of Community of Development prior to the issuance of any building permits.

5. The approval of Stage II Design, Sign Program, and Conditional Use Permit shall be valid for a period of three years from the date of City Council approval. The entitlements may be renewed for up to two additional years upon request and approval by the Director of Community Development.

6. Any modifications to the approved Sign Program, including but not limited to sign types, sign locations, and sign details/materials/lighting not specifically identified in the submitted sign packet and/or sign program shall be reviewed and approved by the City's Urban Designer.

7. That if any buildings, sidewalks, curb or gutter, fencing or landscaping areas, etc., adjacent to the project site are damaged during the course of construction on public or private property, the damage shall be repaired and/or replaced to the satisfaction of the City's Urban Designer for private property and the Director of Public Works for public property.
Approval of the Stage II Design Review, Sign Program, Conditional Use Permit shall be subject to the following conditions:

1. That the project shall be in substantial accord with the plans submitted with the application and presented to the City Council at the public hearing except for any modifications as may be required to meet specific Code standards or other conditions stipulated herein to the satisfaction of the Director of Community Development.

2. That all necessary permits, including individual sign permit and encroachment permits, shall be obtained from the City and all construction shall be in compliance with the Glendale Building code and all other applicable regulations.

3. That access to the premises shall be made available to all City of Glendale Community Development Department, Neighborhood Services Division, Police Department, and Fire Department staff upon request for the purpose of verifying compliance with all laws and the conditions of this approval.

4. A Density Bonus Housing Agreement and Housing Plan shall be submitted to be reviewed and approved by the Director of Community of Development prior to the issuance of any building permits.

5. The approval of Stage II Design, Sign Program, and Conditional Use Permit shall be valid for a period of three years from the date of City Council approval. The entitlements may be renewed for up to two additional years upon request and approval by the Director of Community Development.

6. Any modifications to the approved Sign Program, including but not limited to sign types, sign locations, and sign details/materials/lighting not specifically identified in the submitted sign packet and/or sign program shall be reviewed and approved by the City’s Urban Designer.

7. That if any buildings, sidewalks, curb or gutter, fencing or landscaping areas, etc., adjacent to the project site are damaged during the course of construction on public or private property, the damage shall be repaired and/or replaced to the satisfaction of the City’s Urban Designer for private property and the Director of Public Works for public property.
In August 2011, the Glendale City Council adopted Ordinance No. 5744, which becomes effective on September 9, 2011 ("Ordinance"). The Ordinance prohibits campaign contributions from "applicants seeking entitlement," their contractors and subcontractors (including their architects, engineers, and design professionals) while the application is "pending" and for 12 months thereafter. The Ordinance also prohibits Council Members from voting on any matter pertaining to an entitlement if the Council member has received a campaign contribution from the applicant seeking the entitlement, or certain contractors or subcontractors of the applicant, within the 12-month period preceding the vote.

The Applicant and the Owner/Lessor hereby discloses as follows.

(If printing, please print legibly. Use additional sheets as necessary.)

1. Name of Applicant and Name of Owner/Lessor on whose behalf application is filed:

<table>
<thead>
<tr>
<th>Full Name</th>
<th>Title</th>
<th>Business Address</th>
<th>City</th>
<th>State</th>
<th>Zip</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dikran K Garikian</td>
<td>Owner</td>
<td>345 Pioneer Drive – Unit 1004</td>
<td>Glendale</td>
<td>CA</td>
<td>91203</td>
</tr>
<tr>
<td>Rodney V Khan / Khan Consulting Inc</td>
<td>Consultant</td>
<td>1111 North Brand Boulevard</td>
<td>Glendale</td>
<td>CA</td>
<td>91202</td>
</tr>
</tbody>
</table>
II. Officers or owners/investors of Applicant Entity. Please also disclose the following persons or entities related to the applicant entity: CEO/President, Chairperson, Chief Operations Officer, Chief Financial Officer, any member of the Board of Directors, and any individual or entity that owns 10% or more the contractor of applicant seeking entitlement, as well as any campaign committee that is sponsored and controlled by the contracting party.

<table>
<thead>
<tr>
<th>Full Name</th>
<th>Title</th>
<th>Business Address</th>
<th>City</th>
<th>State</th>
<th>Zip</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dikran K Garikian</td>
<td>Owner</td>
<td>345 Pioneer Drive – Unit 1004</td>
<td>Glendale</td>
<td>CA</td>
<td>91203</td>
</tr>
</tbody>
</table>

III. Contractor of Applicant(s) Seeking Entitlement*

<table>
<thead>
<tr>
<th>Company / Address / Telephone</th>
<th>Management</th>
</tr>
</thead>
</table>
| Thomas P Cox Architects (TCA Architects) 19782 MacArthur Boulevard, Suite 300, Irvine CA 92612 Tel: 949.862.0270 | Principal/CEO – Thomas Cox  
Associate Principal – Michael de Villiers, AIA |
| David K Larkins Inc dba LRM Ltd 10335 Jefferson Boulevard, Culver City CA 90232 Tel: 310.839.6600 | President – David K Larkins |
| Impact Sciences Inc 70 South Lake Avenue, 10th Floor, Pasadena CA 91101 Tel: 626.564.1500 | Senior Project Manager – Jessica Kirchner Flores, AICP |
| LG2WB Engineers Inc, dba Linscott, Law & Greenspan, Engineers 600 South Lake Avenue, Suite 500, Pasadena CA 91106 Tel: 626.796.2322, ext 222 | Chairman of the Board – Paul W Wilkinson, PE  
Chief Financial Officer – David S Shender, PE  
President – John P Keating, PE  
Principal – Clare M Look-Jaeger, PE |

* “Contractor of Applicant Seeking Entitlement” means “a person who has, or has been promised, a contract as an architect, design professional, engineer, or general or prime contract with an applicant seeking entitlement. “Contractor of applicant seeking entitlement”, includes not only the contracting party but also the CEO/President, Chairperson, Chief Operations Officer, Chief Financial Officer, any member of the Board of Directors, and any individual or entity that owns 10% or more the contractor of applicant seeking entitlement, as well as any campaign committee that is sponsored and controlled by the contracting party. Please list the names and addresses of all of these parties.

IV. Subcontractor of Applicant(s) Seeking Entitlement**
** "Subcontractor of Applicant Seeking Entitlement" means "a person who has, or has been promised, a subcontract as an architect, design professional, engineer, or perform other work with a 'contractor an applicant seeking entitlement.' " Subcontractor of applicant seeking entitlement, includes not only the subcontracting party but also the CEO/President, Chairperson, Chief Operations Officer, Chief Financial Officer, any member of the Board of Directors, and any individual or entity that owns 10% or more the subcontractor of applicant seeking entitlement, as well as any campaign committee that is sponsored and controlled by the subcontracting party. Please list the names and addresses of all of these parties.

V. Disclosure. The Applicant Seeking Entitlement has made campaign or officeholder contributions in the preceding 12 months to City of Glendale elected officials as follows:

<table>
<thead>
<tr>
<th>Elected Official</th>
<th>Name of Individual or Entity</th>
<th>Date of Contribution</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

I hereby certify, on behalf of the above-named applicant(s) and owner(s)/lessor(s), that the applicant seeking entitlement has made the campaign contributions as set forth above. I also certify that the names of all contractors of applicant and all subcontractors of applicant, as of today's date, are fully set forth above. I further acknowledge that the applicant has a continuing obligation to update this disclosure form if the applicant selects additional or substitute architects, design professionals, contractors or subcontractors within ten (10) days of the selection of change. I hereby certify that I have been legally authorized by the applicant/owner/lessor to submit this disclosure form and certify to the content hereof.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 7/22/13 at Glendale, California

Applicant's Signature ___________________________ 2, Print Applicant's Full Name Rodney V Khan / Khan Consulting Inc

Applicant's Address 1111 North Brand Boulevard – Suite 403, Glendale CA 91202

Applicant's Contact Phone Number (818) 507-1605

Applicant's Email Address khanconsulting@aol.com
NOTICE OF PUBLIC HEARING
"THE LINK" MIXED-USE PROJECT
3901 – 3915 SAN FERNANDO ROAD

NOTICE IS HEREBY GIVEN:

Project Location/Description
The proposed mixed-use project ("Project") encompasses four adjoining lots located at 3901 – 3915 San Fernando Road. The combined 45,788 square-foot site is currently developed with two buildings and a surface parking lot and is located on the northwest corner of Central Avenue and San Fernando Road in the Tropico Station Neighborhood. The existing buildings are proposed to be demolished. The Project is a five-story mixed-used building with approximately 16,200 square feet of commercial space on the ground floor and 142 multiple family residential dwelling units on the upper floors. The Project will provide a total of 244 parking spaces on-grade and in two levels of subterranean parking garage.

Entitlement(s) Requested
Stage II Design Review – The Project’s architectural design will be presented to the City Council for Stage II Design Review approval and certification of the environmental impact report (EIR).

Sign Program – A Sign Program is required when new nonresidential buildings or additions of nonresidential floor area are approved for construction and where there are at least two separate nonresidential occupancies on the lot or site (Chapter 30.33.220 (A)). The Project is comprised of more than two retail/commercial occupancies on the ground floor of a five-story, mixed-use building.

Conditional Use Permit – A Conditional Use Permit is required to construct multiple residential dwelling units in the IMU-R (Industrial/Commercial-Residential Mixed Use) Zone (Chapter 30.14, Table 30-14-A). The Project will provide 142 multiple residential dwelling units in a five-story, mixed-use building.

The Stage II Project Design Submission, Sign Program, Conditional Use Permit and corresponding documents are available for public review in the Community Development Department, Planning Division, Room 103 of the Municipal Services Building, 633 East Broadway, Glendale.

If you desire more information on the proposal, please contact the case planner, Rathar Duong in the Community Development Department at (818) 937-8185 (email: rduong@ci.glendale.ca.us).

Public Hearing
The Project described above will be considered by the Glendale City Council at a public hearing in the Council Chambers of the City Hall, 613 East Broadway, Glendale, on TUESDAY, DECEMBER 10, 2013, at or after the hour of 3:00 p.m.

Any person having any interest in the Project described above may appear at the public hearing listed above either in person or by counsel or both and may be heard in support of their opinion. Any person protesting may file a duly signed and acknowledged written protest with the City Clerk at, or prior to the public hearings. "Acknowledged" shall mean a declaration of property ownership (or occupant if not owner) under penalty of perjury. If you challenge the Project described above, per Government Code Section 65009, you may be limited to raising only those issues you or someone else raised at the public hearings described in this notice, or in written correspondence delivered to the City of Glendale at, or prior to, the public hearings. Staff reports are accessible a week prior to the meeting through hyperlinks in the "Agendas and Minutes" section. Website Internet Address: http://www.ci.glendale.ca.us/agenda.aspx

Date: November 27, 2013