



Prepared For:

City of Glendale
Community Development Dept.
Planning Division
633 E. Broadway, Room 103
Glendale, CA 91206

North Central Avenue Apartments Project

Final Environmental Impact Report

SCH No. 2013051031



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Prepared for:

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Planning Division
633 East Broadway, Room 103
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1.0 INTRODUCTION

PURPOSE

This Final Environmental Impact Report (Final EIR) has been prepared for the North Central Avenue Apartments Project (Project) by the City of Glendale (the City). The purpose of a Final EIR is to provide an opportunity for the lead agency to respond to comments made by the general public and public agencies on the information, analysis, and conclusions in the Draft EIR.

The City prepared this Final EIR in accordance with the California Environmental Quality Act (CEQA; California Public Resources Code Section 21000, *et seq.*) and the “Guidelines for the Implementation of the California Environmental Quality Act” (California Code of Regulations, Title 14, Section 15000, *et seq.*, *State CEQA Guidelines*).

ORGANIZATION OF FINAL EIR

As required by the *CEQA Guidelines* Section 15132, this Final EIR includes the following information:

- The Draft EIR or a revision of the draft. This Final EIR incorporates the Draft EIR by reference.
- A list of persons, organizations, and public agencies commenting on the Draft EIR.
- The comments received on the Draft EIR.
- The responses to significant environmental points raised in the comments received.
- The revisions to the Draft EIR.

The Final and Draft EIR are available for review at the following locations:

City of Glendale
Community Development Department
Planning Division
633 East Broadway, Room 103
Glendale, California 91206

In addition, the Final EIR and Draft EIR are available on the City’s website at:

<http://www.ci.glendale.ca.us/default.aspx>

ENVIRONMENTAL REVIEW PROCESS

The City is the Lead Agency responsible for preparation of this Final EIR because it has the principal responsibility for approving and implementing the Project.

The City conducted a preliminary review of the Project and determined that preparation of an EIR was required to evaluate the potential significant effects of the Project on the environment.

On May 8, 2013, the City circulated a Notice of Preparation (NOP; State Clearinghouse Number [SCH] 201305103) of an EIR for review and comment by the public and the responsible and reviewing agencies. The 30-day NOP review period ended on June 11, 2013.

The purpose of a public and agency review of a NOP is to assist in identifying potential environmental effects of the Project as proposed to assist the lead agency in:

- Focusing the EIR on the effects determined to be potentially significant;
- Identifying the effects determined not to be significant;
- Explaining the reasons for determining that potentially significant effects would not be significant; and
- Identifying whether a program EIR, tiering, or another appropriate process can be used for analysis of the Project's environmental effects.

The NOP also provided notice of the public scoping meeting held by the City on May 22, 2013, at 6:00 PM in the City of Glendale Municipal Services Building to provide an additional opportunity for comment on the potential environmental effects of the Project.

During the 30-day NOP comment period, the City received written comments from seven different agencies and organizations and from two individuals.

The City prepared the Draft EIR and released it for public review on August 12, 2013. The Draft EIR included an analysis of potential environmental effects related to the following environmental topics:

- Aesthetics
- Air Quality and Greenhouse Gas Emissions
- Cultural Resources

- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Public Services
- Recreation
- Population and Housing
- Traffic and Transportation
- Utilities and Service Systems

The Draft EIR was made available for public review for 45-days from August 12, 2013 through September 26, 2013.

A Notice of Availability (NOA) of the Draft EIR was published by the Glendale News Press newspaper on August 10 and 11, 2013, and filed with Los Angeles County Clerk.

A Notice of Completion (NOC) of the Draft EIR was provided on August 12, 2013, to the State Clearinghouse.

Following the completion of the 45-day public review period for the Draft EIR, the City prepared this Final EIR in accordance with Sections 15089 and 15132 of the *CEQA Guidelines*.

Prior to considering approval of the Project, Section 15090 requires the City to certify the following:

- That the Final EIR was completed in compliance with CEQA;
- That the Final EIR was presented to the City Council and that the City Council reviewed and considered the information contained in the Final EIR prior to considering approval of the Project; and
- That the Final EIR reflects the City's independent judgment and analysis.

Section 15191 of the *CEQA Guidelines* requires the City to make one or more written findings of fact for each significant environmental impact identified in a certified Final EIR. The possible findings include the following:

- The Project was changed (including adoption of mitigation measures) to avoid or substantially reduce the magnitude of the impact;
- Changes to the Project are within another agency's jurisdiction and have been or should be adopted;
or
- Specific considerations make mitigation measures or alternatives infeasible.

After considering the information in the Final EIR and making the required findings, the City may consider approval of the Project. If impacts are identified in the Final EIR as significant and unavoidable, the City is required to prepare a Statement of Overriding Considerations, identifying the specific benefits of the Project that the City determines outweigh the unavoidable impacts of the Project.

Section 15097 of the *CEQA Guidelines* requires the City to adopt a Mitigation Monitoring and Reporting Program (MMRP) to ensure that the mitigation measures identified for the Project in the EIR are implemented.

2.0 EIR SUMMARY

This section provides information on the background of the Project assessed in the Environmental Impact Report (EIR), and a summary of the information in the EIR identifying the potential environmental impacts of the Project, the measures identified to mitigate these impacts, and the alternatives evaluated to provide additional information on ways to avoid or lessen these impacts.

BACKGROUND

In 2006, the City of Glendale adopted the Glendale Downtown Specific Plan (DSP) to guide development and design within approximately 220 acres in the center of the City. The majority of Site A is within the DSP, with the remaining portion of the site zoned as High Density Residential. All of Site B is located within the DSP. The DSP conforms to the General Plan with several distinct districts. The DSP includes standards and criteria for development in the downtown area, transition zones between office and high-rise development, and the scale for residential and commercial zones. The DSP allows for an array of commercial uses in addition to high-density urban housing and mixed-use developments. The Project is located on two sites, A and B, which are in or near the DSP area. The majority of Site A is located in the Central Transitional District as defined in the DSP, with the remaining portion being outside the DSP area. As envisioned in the DSP, this area is an important transition between the high-intensity mixed activity of Downtown and the medium–high-density residential developments. Site B is located in the Orange Central District. The DSP indicates that because of its walkable proximity to major retail and employment areas, the Orange-Central district is suitable for new, urban housing development both as mixed-use or free-standing residential buildings.

OVERVIEW OF THE PROPOSED PROJECT

The Project proposes the development of two five-story residential buildings on two sites (Site A and Site B). Site A consists of a five-story apartment building with 315 residential units and 456 associated parking spaces. Site B consists of a five-story apartment building with 192 units and 275 associated parking spaces. As proposed, the Project would include a "wrap" style development where the Project wraps residential units around an above-ground parking structure. The wrap style allows most residents to park their vehicle on the same level as their residential unit. Each site would contain studios and one-, two-, and three-bedroom units designed in a variety of layouts and sizes.

Site A is presently developed with two medical office buildings and a 20-unit multifamily residential building with detached garages, overhead utility lines, and surface parking. The site is bisected by an alley in a north–south direction between Doran Street and Pioneer Drive, and partially by an alley in an east–west direction. Within the boundary of Site A, the first medical building is located on the northeast

corner of the site near Pioneer Drive and Central Avenue. It is three-stories in height with a building façade of red bricks with a small cream-colored awning at the main entrance. The second medical building is located near the southeast corner of the site near West Doran Street and Central Avenue. The building is four-stories in height with a façade of neutral monotone colored bricks.

There are approximately 20 multifamily residential units with detached garages located along the south side of the alley along the west side of Site A in a tan-colored, two-story building. Land uses around Site A include a parking structure and the UNUM building to the north, commercial uses to the east, a fast-food restaurant with associated surface parking to the south, and a small park along with multifamily and single family residential developments to the west.

Site B is developed with one three-story medical facility building that features a façade of red bricks and surface parking. The existing building is located near the northwest corner of Site B. Land uses around Site B include a parking structure and the approved six-story Nexus at Central development to the north, a Wells Fargo Bank with a drive-through lane and a parking structure to the east, and a tall commercial office building with a parking structure on the south.

PROJECT OBJECTIVES

The *CEQA Guidelines* require an EIR to include a statement of the objectives of the Project that address the underlying purpose. The Applicant is proposing to develop 507 multifamily residential units on two sites with associated parking in each structure on the Project site. The objectives of the Project include the following:

- Support the Objectives of the DSP.
- Redevelop underutilized property to provide additional residential opportunities in the City of Glendale.
- Provide well-designed development that is compatible and complementary with surrounding land uses.
- Provide property tax revenues to the City of Glendale.
- Generate construction employment opportunities in the City and in the region.
- Provide housing opportunities in an urban setting in close proximity to employment opportunities, public facilities, goods, and services.
- Utilize architectural design, lighting, and landscape design to enhance the architectural character of the proposed buildings and contribute to an attractive skyline in downtown Glendale.

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

A summary of the potential environmental impacts of the Project and the measures identified to mitigate these impacts is provided in **Table 2.0-1, Summary of Project Impacts** for each topic addressed in this Draft EIR. **Table 2.0-1** has been arranged in four columns: the identified impact under each EIR issue area, the level of significance prior to implementation of mitigation, mitigation measures that would avoid or reduce the level of impacts, and the level of significance after implementation of mitigation measures, if applicable. Compliance with existing City programs, practices, and procedures are assumed for purposes of determining the level of significance prior to mitigation.

A summary of the alternatives to the Project to promote informed decision making are provided after **Table 2.0-1**.

**Table 2.0-1
Summary of Project Impacts**

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
Aesthetics			
Existing views available across the site from public roadways and sidewalks would be modified with the Project development because more of the site would be covered with taller buildings than presently exist. Existing scenic vistas from the Project site are limited by existing developments but include some long-range views of the Verdugo Mountains to the north and the Santa Monica Mountains to the west. Due to the obstruction of existing development, long-distance views of the San Rafael Hills are mostly limited to the views along major streets.	Less than significant.	No mitigation measures are required.	Less than significant.
Although the proposed buildings and general building mass would be more intensified than the existing buildings located around the site, the architectural design would result in the massing of the buildings being visually compatible. The Project elements to be introduced will modernize the aesthetic character of the site given the architectural design of the Project, the use of design elements, and the comprehensive landscape plan to be implemented.	Less than significant.	No mitigation measures are required.	Less than significant.
All Project lighting will be focused on the site and shielded away from adjacent residents and the park. The new on-site lighting would not result in substantial increases in light or glare that would affect any light-sensitive	Less than significant.	No mitigation measures are required.	Less than significant.

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
uses on or near the site.			
The proposed mass of the structures on Sites A and B would create additional shadows. These shadows would not exceed two consecutive hours during the summer solstice (9:00 AM to 5:00 PM) or during the winter solstice (9:00 AM to 3:00 PM).	Less than significant.	No mitigation measures are required.	Less than significant.
Air Quality and Greenhouse Gas Emissions			
The Project would generate approximately 1,315 residents. The Project would account for approximately 21 percent of the anticipated increase of residents within the City between 2012 and 2020. This total is within the growth projections for the City of Glendale as adopted by SCAG. Because the SCAQMD has incorporated these same projections into the AQMP, the Project would be consistent with the projections in the 2012 AQMP.	Less than significant.	No mitigation measures are required.	Less than significant.
Construction of the Project would not result in emissions of CO, SO _x , PM ₁₀ , and PM _{2.5} that do not exceed the SCAQMD daily thresholds for criteria pollutants.	Although unmitigated emissions for PM ₁₀ and PM _{2.5} are below SCAQMD thresholds, standard mitigation in compliance with SCAQMD rules and regulations would be implemented.	<p>4.2-1 Prior to grading, the grading plan, building plans, and specifications will stipulate that, in compliance with SCAQMD Rule 403, excessive fugitive dust emissions shall be controlled by regular watering or other dust prevention measures. In addition, SCAQMD Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating an off-site nuisance. Implementation of the following measures would reduce short-term fugitive dust impacts on nearby sensitive receptors:</p> <ul style="list-style-type: none"> • All active grading portions of the construction site shall be watered at least three times daily to prevent 	Less than significant.

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
		<p>excessive amounts of dust.</p> <ul style="list-style-type: none"> • On-site vehicle speed shall be limited to 15 miles per hour (mph). • Any temporary on-site construction routes shall be paved where feasible, watered as needed (to maintain a moisture content of 12 percent), or chemically stabilized. • Visible dust beyond the property line that emanates from the Project shall be prevented to the maximum extent feasible. • All material transported off site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust prior to departing the job site. • Track-out devices shall be used at all construction site access points. • All delivery truck tires shall be watered down and/or scraped down prior to departing the job site. • Replace ground cover on disturbed areas quickly. • Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph. • Prohibit truck idling in excess of 5 minutes, on and off site. • Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads. • Reroute construction haul trucks away from congested streets or sensitive 	

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
<p>Construction emissions for NO_x would exceed SCAQMD’s significance threshold primarily associated with demolition activities. In addition, Project-related construction emissions for ROG would exceed SCAQMD’s significance threshold primarily associated with painting and asphalt paving. The demolition and architectural coating activities would be the shortest duration of any of the construction phases.</p>	<p>Significant.</p>	<p>receptor areas.</p> <p>4.2-2 The contractor shall incorporate the following into construction plans and specifications, which shall be implemented to reduce ROG emissions resulting from application of architectural coatings:</p> <ul style="list-style-type: none"> • Contractors shall use high-pressure, low-volume (HPLV) paint applicators with a minimum transfer efficiency of at least 50 percent. • Coatings and solvents with a ROG content lower than required under Rule 1113 shall be used. • Construction and building materials that do not require painting shall be used to the extent feasible. • Prepainted construction materials shall be used to the extent feasible. <p>4.2-3-Project start to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.</p> <p>4.2-4 Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4</p>	<p>Significant and unavoidable.</p>

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
		<p>emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.</p> <p>A copy of each shall be provided at the time of mobilization of each applicable unit of equipment.</p>	
<p>Operational emissions would be generated by both stationary and mobile sources as a result of normal day-to-day activity on the Project site after occupancy. Stationary emissions would be generated by the consumption of natural gas for space and water heating devices. Mobile emissions would be generated by the motor vehicles traveling to and from the Project site. The emissions associated with the Project would not exceed the SCAQMD's recommended operational emission thresholds.</p>	<p>Less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>Overall the results of the localized significance threshold (LST) analysis indicate that maximum pollutant concentrations are predicted to be within acceptable limits for all construction phases and are not anticipated to exceed identified significance thresholds at any receptor location.</p>	<p>Less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>The assessment for criteria pollutants in the Health Risk Assessment (HRA) prepared for the Project revealed that PM₁₀ emissions</p>	<p>Significant.</p>	<p>4.2-5 The apartment developer shall limit particulate infiltration to on-site residents by installing and maintaining air filtration</p>	<p>Less than significant.</p>

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
<p>generated from the adjacent freeway exceed the 24-hour and annual significance thresholds. PM_{2.5} concentrations were also predicted to exceed the 24-hour significance threshold. For CO and NO_x, maximum predicted concentrations were within acceptable limits.</p>		<p>systems with efficiencies equal to or exceeding a Minimum Efficiency Reporting Value (MERV) 13 as defined by the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2.</p>	
<p>The Project would result in direct annual emissions of GHGs during operation. Operational emissions would be generated by both area and mobile sources because of normal day-to-day activities. The Project would also result in indirect GHG emissions due to electricity demand, water consumption, and solid waste generation. The sum of the direct and indirect emissions associated with the Project would be less than SCAQMD's threshold of significance for all land use projects, which is 3,000 MTCO₂e per year.</p>	<p>Less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>Cultural Resources</p>			
<p>The office buildings at 540 North Central Avenue, 607 North Central Avenue, 610 North Central Avenue, and 633 North Central Avenue and the residential apartment complex at 317–327 West Doran Street are not eligible for listing on the Glendale Register, the California Register of Historical Places, or the National Register of Historic Places. The impact of the proposed Project on historical resources is less than significant.</p>	<p>Less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>Prehistoric and historic archaeological sites are not known to exist within the local area.</p>	<p>Significant.</p>	<p>4.3-1 In the event that archaeological resources are unearthed during Project subsurface</p>	<p>Less than significant.</p>

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
<p>In addition, the Project site already has been subjected 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.</p>		<p>activities, all earth-disturbing work within a 200-meter 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.</p>	
<p>Plant and animal fossils are typically found within sedimentary rock deposits. Most of the City of Glendale consists of igneous and metamorphic rock. The local area is not known to contain paleontological resources. In addition, the Project site has already been subject to extensive disruption and is extensively developed. Any superficial paleontological resources that may have existed at one time have likely been previously unearthed by past development activities. Nonetheless, there is a possibility that paleontological resources may exist at deep levels and impacts could occur with the implementation of the Project.</p>	<p>Significant.</p>	<p>4.3.2 In the event that paleontological resources are unearthed during Project subsurface activities, all earth-disturbing work within 100-meter 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.</p>	<p>Less than significant.</p>
<p>The Project site and surrounding area are characterized by features typical of the urban landscape and include retail/commercial 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.</p>	<p>Significant.</p>	<p>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</p>	<p>Less than significant.</p>

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
		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).	
Hazards and Hazardous Materials			
Structures constructed or remodeled between 1930 and 1981 have the potential of asbestos-containing building material (ACBM). These materials can include, but are not limited to, acoustical ceiling texture, resilient floor coverings, drywall joint compounds, acoustic ceiling tiles, roofing materials, piping insulation, electrical insulation, and fireproofing materials. Many of the buildings on Sites A and B were developed prior to the ban on ACBM; therefore, the likelihood that some buildings in the project area contain these materials is high. Potential impacts during development activities associated with the proposed Project could expose the public or environment to ACBMs.	Significant.	4.4-1 Before issuance of a demolition permit for Sites A or B, all buildings to be demolished must be surveyed and sampled for ACBMs by a licensed asbestos abatement contractor. If ACBMs are determined to be present in the structures to be demolished, all asbestos-containing materials must be removed under acceptable engineering methods and work practices by the licensed asbestos abatement contractor prior to demolition. These practices include, but are not limited to, containment of the area by plastic, negative air filtration, wet removal techniques, and personal respiratory protection and decontamination. The process must be designed and monitored by a California Certified Asbestos Consultant. The abatement and monitoring plan must be developed and submitted for review and approval by the appropriate regulatory agencies (currently the City of Glendale Building Official and South Coast Air Quality Management District) and must include all on-site structures with ACBMs.	Less than significant.
There are a number of structures on both Sites A and B that were constructed prior to the ban on lead-containing paints in 1979. Exposure to lead from older vintage paint is possible when the paint is in poor condition or during its removal. Potential health and	Significant.	4.4-2 Before issuance of a demolition permit for Sites A or B, all loose and peeling paint must be removed and disposed of by a licensed and certified lead paint removal contractor, in accordance with local, state,	Less than significant.

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
<p>safety impacts associated with construction activities associated with the Project area could affect anyone in the area (including workers and neighbors) who may be exposed to lead paint.</p>		<p>and federal regulations.</p>	
<p>There are previous uses surrounding Sites A and B such as gasoline stations and dry cleaning sources that may have contaminated the subsurface in or around the Project site. The potential for unknown or unanticipated hazardous materials to be discovered on site could exist during the project construction phase. Consequently, grading and excavation of Sites A and B for future residential and parking garage uses could expose construction workers and the public to potentially unknown hazardous substances present in the soil and/or groundwater.</p>	<p>Significant.</p>	<p>4.4-3 In the event that previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment is encountered during construction within Sites A or B, construction activities in the immediate vicinity of the contamination must cease immediately. If contamination is encountered, a Risk Management Plan must be prepared and implemented that (1) identifies the contaminants of concern and the potential risk each contaminant would pose to human health and the environment during construction and postdevelopment and (2) describes measures to be taken to protect workers and the public from exposure to potential site hazards. Such measures must include a range of options, including, but not limited to, physical site controls during construction, remediation, long-term monitoring, postdevelopment maintenance or access limitations, or some combination thereof. Example soil remediation methods that may be employed include, but are not limited to, one or more of the following: excavation and on-site treatment, such as above-ground bioremediation, soil washing, soil stabilization, soil vapor extraction, or high-temperature soil thermal desorption.</p>	<p>Less than significant.</p>

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
		<p>Example groundwater remediation methods that may be employed include, but are not limited to, pumping water to surface, treating, and returning to aquifer; treating groundwater in place by injecting oxidizing agents; and placing a membrane in an aquifer and using natural flows to trap contaminants. Depending on the nature of contamination, if any, appropriate agencies must be notified (e.g., the City of Glendale Fire Department, the Los Angeles County Environmental Health Division). If needed, a Site Health and Safety Plan that meets Occupational Safety and Health Administration requirements must be prepared and in place prior to commencement of work in any contaminated area.</p>	
<p>The Project site that is not included on a list of hazardous materials sites compiled by Government Code Section 65962.5 that would create a significant hazard to the public or the environment.</p>	<p>Less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>Land Use and Planning</p>			
<p>The Project would not introduce new infrastructure (except where required by utility service providers to accommodate anticipated demand by the proposed uses). The majority of Site A is located in the DSP (with the exception of five lots) and all of Site B is within the DSP. A General Plan Amendment will be required for the inclusion of the five lots at Site A into the DSP. The surrounding sidewalks would be improved and enhanced to encourage</p>	<p>Less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
pedestrian activity. The Project would increase connectivity between the existing uses in the DSP and adjacent areas.			
Site A contains five lots fronting on Doran Street and Pioneer Drive, which have a General Plan Designation of High Density Residential. Upon approval of the General Plan Amendment, the Project would be consistent with applicable goals within the DSP.	Less than significant.	No mitigation measures are required.	Less than significant.
Noise			
The Project would not increase roadway noise levels by 3 dBA or greater. Land uses located along study area roadway ways, would not be affected by traffic noise	Less than significant.	No mitigation measures are required.	Less than significant.
The Project would include residential buildings wrapped around an above-ground parking structure. The wrap style in the garage allows most residents to park their vehicle on the same level as their residential unit. Due to the high level of traffic noise along Central Avenue and SR-134, normal daytime parking structure L_{eq} noise would not likely be audible due to the masking of noise by these sources. However, single noise events could be an annoyance to on-site residents and may exceed the 65 dBA Municipal Code threshold at receptor locations.	Significant.	4.6-1 Sound attenuation measures shall be incorporated into the design to minimize noise leakage from the above-ground parking structure. These measures may include a half-wall on the grade-level parking deck and/or full walls on the sides of the structure that are facing on-site residential uses and/or noise control louvers on selected structure façades that potentially influence receptor areas. Acoustical analysis shall be performed to demonstrate that the above-ground parking structure does not result in noise levels that exceed City standards at on-site residences. These components shall be incorporated into the plans to be submitted by the applicant to the City of Glendale for review and approval prior to the issuance of building permits.	Less than significant.

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
Other noise sources that may be associated with the parking structure areas include the use of sweepers in the early morning or late evening hours.	Significant.	4.6-2 On-site sweeper operations shall be restricted to between the hours of 7:00 AM and 10:00 PM.	Less than significant.
Existing plus project exterior noise levels on the Project site due to vehicle traffic along the North Central Avenue frontage and near the intersections of North Central/Doran Street and North Central Avenue/Pioneer Street are in the approximate range of 67.7 to 68.3 CNEL. These noise levels are not uncommon for a typical downtown urban setting. Noise levels would be above the City Municipal Code exterior noise threshold of 65 dBA for residential uses, and because the Project proposes exterior living areas along North Central Avenue, such as small balcony patios, which are considered to be exterior useable areas by the City of Glendale, impacts would be significant. In addition, interior noise levels in the apartment building along these roadways could be above the interior threshold of 55 dBA during the daytime and 45 dBA during the nighttime.	Significant.	<p>4.6-3 Noise-sensitive residential land uses proposed in areas exceeding the exterior 65 dBA CNEL (such as those dwelling units facing North Central Avenue) shall be designed so that interior noise levels attributable to exterior sources do not exceed 55 dBA during the daytime and 45 dBA during the nighttime when doors and windows are closed. An acoustical analysis of the noise insulation effectiveness of proposed construction shall be required and documented during permit review, showing that the building materials and construction specifications are adequate to meet the interior noise standard. Examples of building materials and construction specifications that may be used to meet the interior noise standard include, but are not limited to, the following:</p> <ul style="list-style-type: none"> • Windows and sliding glass doors along North Central Avenue shall be double paned, mounted in low air filtration rate frames, and have a minimum sound transmission coefficient rating of 30 or greater. • Air conditioning units may be provided to allow for windows to remain closed. • Roof or attic vents facing northward shall be baffled. 	Significant and unavoidable (exterior). Less than significant (interior).
Land uses surrounding the Project site	Significant.	4.6-4 All demolition, earthmoving, and ground-	Significant and

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
<p>consist mostly of residential and commercial uses. High noise-producing (and vibration-producing) activities during construction would be scheduled to occur between the hours of 8:00 AM and 5:00 PM to minimize disruption on sensitive uses. Nonetheless, potential impacts due to vibration would be considered to be significant.</p>		<p>impacting operations shall be conducted so as not to occur in the same period.</p> <p>4.6-5 Select demolition method to minimize vibration, where possible (e.g., sawing masonry into sections rather than demolishing it by pavement breakers).</p> <p>4.6-6 Operate earthmoving equipment on the construction site as far away from vibration-sensitive sites as possible.</p>	<p>unavoidable.</p>
<p>Equipment used during the construction phases would generate both steady state and episodic noise that would be heard both on and off the Project site. Noise levels generated during construction would primarily affect the warehouse and industrial uses adjacent to the Project site. Potential construction-related noise impacts are considered significant due to exceeding the noise threshold of 65 dBA for residential uses and 70 dBA for commercial areas, as allowed by the Municipal Code.</p>	<p>Significant.</p>	<p>4.6-7 All construction activity within the City shall be conducted in accordance with Section 8.36.080, Construction on buildings, structures and projects, of the City of Glendale Municipal Code.</p> <p>4.6-8 The following construction best management practices (BMPs) shall be implemented to reduce construction noise levels:</p> <ul style="list-style-type: none"> • Ensure that construction equipment is properly muffled according to industry standards and is 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 	<p>Significant and unavoidable.</p>

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
		<p>blankets around stationary construction noise sources.</p> <ul style="list-style-type: none"> • Use electric air compressors and similar power tools rather than diesel equipment, where feasible. • Turn off construction-related equipment, including heavy-duty equipment, motor vehicles, and portable equipment when not in use for more than 30 minutes. • Clearly post construction hours, allowable workdays, and the phone number of the job superintendent at all construction entrances to allow for surrounding owners to contact the job superintendent. If the City or the job superintendent receives a complaint, the superintendent shall investigate, take appropriate corrective action, and report the action taken to the reporting party. <p>4.6-9 Construction staging areas along with the operation of earthmoving equipment within the Project area shall be located as far away from vibration-and noise-sensitive sites as possible.</p>	
Public Services			
Fire Protection and Emergency Services			
The new residential units would create additional demand on the Glendale Fire Department, specifically to Station No. 26, which would have first response duties. The increase in residents within the City would not substantially impact the current fire	Less than significant.	No mitigation measures are required	Less than significant.

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
<p>services and would not result in the need for any new facilities or the physical alteration to any existing governmental facility.</p>			
<p>The additional residents associated with the Project would result in an increase in emergency medical responses. The Project is located within the response district for RA 26, which currently averages 306 calls per month. The City has no formal service ratios or performance objectives for BLS transport ambulance service, but has considered a performance workload of 350 responses per month for BLS transport ambulance service. The Project would generate additional emergency medical service (EMS) calls every month, but this is not anticipated to be above the current performance workload of 350 responses per month for a rescue ambulance and would not result in the need for any new facilities or the physical alteration to any existing governmental facility.</p>	<p>Less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>The City of Glendale’s minimum fire flow requirement for water mains in the streets surrounding the Project site is 6,000 gpm at 20 pounds per square inch (psi) of residual pressure. Water service to the Project site is presently provided by existing water lines on and adjacent to the site. The adequacy of these lines to provide needed fire flow to the Project is not known and, as such, potential fire flow impacts are considered significant. The City of Glendale’s policy requires upgrades to water lines serving new development to meet minimum fire flow</p>	<p>Significant.</p>	<p>4.7.1-1 Replace the existing water mains with minimum 12 inches in diameter water mains as applicable and/or make water main improvements as dictated by Glendale Water and Power Water Engineering.</p> <p>4.7.1-2 The Project applicant shall provide city standard fire hydrants on the streets adjacent to the Project (as applicable) at approximately 300 feet on center or as approved by the Glendale Fire Department and Glendale Water and Power. The fire hydrants shall have three outlets (three, 2.5 x 4 x 4) with a 6 inch minimum lateral</p>	

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
requirements for new development.		supply.	
<p>The Project and related projects together would result in the addition of approximately 8,172 residents. Development under the DSP, which includes many of the projects on the related project list, was determined to result in the direct addition of approximately 7,166 new residents. Impacts associated with these additional residents would include an increase in fire protection responses, public education activities, participation in community events, and ongoing relations with homeowners associations. For these reasons, the implementation of the DSP was considered to result in a significant impact to fire service. The City of Glendale made findings and adopted a Statement of Overriding Considerations for this significant fire impact as part of the DSP approval. As discussed previously, the Project would not result in significant impacts to the Glendale Fire Department on a project-specific level. The Project, however, would contribute to the significant impact identified within the DSP EIR and would be considered to be cumulatively considerable.</p>	Significant.	No mitigation measures are available at this point in time.	Significant and unavoidable (cumulative).
Police Protection			
<p>The new residential units would create additional demand on the Glendale Police Department, specifically in the Central Business District Command Area. The increase in residents within the City would</p>	Less than significant.	No mitigation measures are required.	Less than significant.

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
not substantially impact the current officer-to-population ratio and would not result in the need for any new facilities or the in the physical alteration to any existing governmental facility.			
The Glendale Police Department considers current response times in the City adequate and due to the distance of the Project from the nearest police station and the increase in calls for service, the Project would not adversely affect response times in the City. The Project would not result in the need for any new facilities or in the physical alteration to any existing governmental facility.	Less than significant.	No mitigation measures are required.	Less than significant.
The Project and related projects would result in the addition of approximately 8,172 residents. Development under the DSP, which includes many of the projects on the related project list, was determined to result in the direct addition of approximately 7,166 new residents and would reduce the present officer-to-population service ratio within the City. Although the change was considered to be less than 4 percent and was not considered to be substantial, in addition to it occurring over an extended period of time (build out), the implementation of the DSP was considered to result in significant impacts to police services. The City of Glendale made findings and adopted a Statement of Overriding Considerations for this significant impact as part of the DSP approval. As discussed previously, the Project would not result in significant impacts to the Glendale Police Department	Significant.	No mitigation measures are available at this time.	Significant and unavoidable (cumulative).

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
<p>on a project-specific level. The Project, however, would contribute to the significant impact identified within the DSP EIR and would be considered to be cumulatively considerable.</p>			
Schools			
<p>The Project would add an additional 322 students to the GSUD. All schools serving the Project site are currently operating under capacity and would not require the provision of new or would physically alter existing school facilities. As authorized by SB 50, the project applicant shall pay school impact fees to the GUSD prior to the issuance of building permits.</p>	<p>Less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
Recreation			
<p>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 would result from the increase in residents associated with the Project.</p>	<p>Significant.</p>	<p>4.8-1 Developer agrees to pay 100% of the Parks and Library Impact Fees within one year from the Effective Date at the rate in effect at the time of payment (\$7,000 per residential unit); provided, however, that Developer acknowledges and agrees that it shall make additional Parks and Library Impact Fees payment(s) for any approved increase in the number of units or on any approved increase in commercial square footage of the Project submitted by Developer after the Fee Payment. Any additional payment for additional units or square footage shall be calculated at the rate in effect at the time of payment. Notwithstanding the foregoing, the Developer acknowledges and agrees that it shall not be eligible for any reduction,</p>	<p>Significant and unavoidable.</p>

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
		<p>rebate or reimbursement in the amount of Fee Payment (i) should Developer choose to reduce the number of units or square footage in the Project; (ii) in the event the plan check submission expires, (iii) the Developer otherwise withdraws from the City’s building plan check process, or (iv) the building permit expires and the Project is not completed. At the time of any re-submission of the Project to plan check, or any approved revision to the Project, Developer shall be required to pay the difference between any Parks and Library Impact Fees previously paid and the Parks and Library Impact Fees payable at the rates in effect at such time. The parties acknowledge that Developer’s Fee Payment is of substantial benefit to the Developer and the City, and in exchange for, and in consideration of that substantial benefit, the Developer agrees to forego and to forever waive the right to request a refund of, reduction to, or modification of the Fee Payment. If Developer’s Fee Payment does not clear, is cancelled by Developer, or is rendered ineffective for any reason, Developer shall then pay the Parks and Library Impact Fees at the rate then in effect as specified in the Development Impact Fee Ordinance No. 5575 and associated Fee Resolution. Developer agrees to make the Fee Payment within one year from the Effective Date at the rate in effect at the time of the Fee Payment. Provided, however, if Developer does not make the Fee Payment within the time</p>	

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
		<p>period set forth herein, then Developer shall pay the Parks and Library Impact Fees pursuant to Ordinance 5575 or as that Ordinance may be amended by the City at the rates then in effect.</p>	
<p>Given the existing deficiency of parkland in the City, the combined effects of the Project and related projects on existing facilities is considered cumulatively significant because the use of existing parks would increase, thus contributing to an acceleration in the physical deterioration of these facilities. Even with the provision of Project amenities, the Project's contribution to this significant impact would be cumulatively considerable.</p>	<p>Significant.</p>	<p>Under CEQA, the development impact fee payments constitute mitigation of project-related impacts on parks and recreation land and facilities within Glendale. However, the fee payment is not considered to fully mitigate this impact, because the fee amount to be paid would not equal the full fair-share per-unit fee for residential projects, which was determined to be \$14,251 per multifamily unit in the City's Public Facilities Fee Study. Consequently, impacts would be significant and unavoidable.</p>	<p>Significant and unavoidable (cumulative).</p>
<p>Population and Housing</p>			
<p>The Project would replace 20 multifamily residential units (approximately 52 individuals) with 507 multifamily residential units. The anticipated 52 temporarily displaced individuals would not significantly impact the availability of residential units within the DSP because the Project will create housing for approximately 1,271 net new additional people within the DSP or the City.</p>	<p>Less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>The Project would develop a residential apartment building with parking to Site A and B for a total of 507 multifamily residential units (487 net new residential units). The Project would generate approximately 1,271 net new residents in</p>	<p>Less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
<p>the DSP. The Project would account for approximately 21 percent of the anticipated increase of residents within the City between 2012 and 2020.</p>			
Traffic			
<p>The Project is anticipated to result in a reduction of approximately 20 daily vehicle trips and 30 PM peak-hour trips, and an increase of 33 AM peak-hour trips from existing conditions. Consequently, the Project traffic would not significantly impact any study area intersection and would actually improve operations at a few intersection locations.</p>	<p>Less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>There are no CMP-intersection monitoring locations in the Project vicinity. The CMP TIA guidelines require that intersection-monitoring locations must be examined if the Project will add 50 or more trips during either the peak AM or PM weekday periods. The Project would not add 50 or more trips during the peak AM or PM hours at any CMP monitoring intersections, which is the threshold for preparing a traffic impact assessment, as stated in the CMP manual. Therefore, the Project would have a less than significant impact to intersection monitoring locations that are part of the CMP highway system.</p>	<p>Less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
<p>Based on the projected decrease in demand for transit services generated by the Project, it is anticipated that the existing transit service in the Project area would adequately accommodate the Project-generated transit trips. Thus, based on the calculated number of generated transit trips, no Project impacts on existing or future transit services in the Project area are expected to occur.</p>	<p>Less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>Utilities and Service Systems</p>			
<p>Water Service</p>			
<p>The City has adequate supply to meet citywide demand under normal and drought conditions. Even with the addition of 61.35 acre-feet per year of demand generated by the Project, there is sufficient supply to meet City demand under normal and drought conditions.</p>	<p>Less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>Sewer</p>			
<p>Sewage from the Project site goes to the Hyperion Treatment Plant, which Glendale has access to through the Amalgamated Agreement. With the Hyperion Treatment Plant currently operating 88 million gallons per day (gpd) below capacity, adequate capacity exists to treat Project-generated average effluent of 37,839 gpd.</p>	<p>Less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
<p>The Project would increase flows within the Salem/San Fernando Flume, which has a capital improvement cost of \$2,824,100 and projected future flows of 2.89 million gpd.</p>	<p>Significant.</p>	<p>4.11.2-1 The Project applicant shall pay a sewer capacity increase fee for the Project’s sewage increase to the lines in the Salem/San Fernando Flume area to alleviate sewer impacts. These collected fees shall be deposited by the City of Glendale into a specially created account to be used to fund capacity improvements to the Salem/San Fernando Flume drainage basin.</p>	<p>Less than significant.</p>
<p>Solid Waste</p>			
<p>Solid waste generated on the Project site would be deposited at the Scholl Canyon Landfill, which is owned by the City of Glendale, or one of the landfills located within the County of Los Angeles. The Scholl Canyon facility would have sufficient capacity to accommodate the demand for Class III disposal facilities generated by the Project site. The increase in solid waste generation associated with the operation of the Project would not exacerbate landfill capacity shortages in the region to the point of altering the projected timeline of any landfill to reach capacity.</p>	<p>Less than significant.</p>	<p>No mitigation measures are required.</p>	<p>Less than significant.</p>
<p>There is presently insufficient permitted solid waste disposal capacity within the existing system serving Los Angeles County. 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</p>	<p>Significant.</p>	<p>No mitigation measures are available at this time.</p>	<p>Less than significant.</p>

Project Impacts	Impact Without Mitigation	Mitigation Measures	Impact With Mitigation
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.			

SUMMARY OF ALTERNATIVES

This Draft EIR considers a range of Alternatives to the Project in accordance with *CEQA Guidelines* Section 15126.6. This section of the Guidelines requires that an EIR describe and evaluate a range of reasonable alternatives to a project to promote informed decision making.

The Alternatives to the Project evaluated in this Draft EIR include the following:

- Alternative 1 – No Project/No Development
- Alternative 2 – Reduced Density Development of Site B Only (62-Percent Reduction)
- Alternative 3 – Reduced Density Development of Site A Only (38-Percent Reduction)

A brief description of each of these Alternatives is provided as follows with a summary of the evaluation of each.

According to the *CEQA Guidelines*, the discussion of alternatives should focus on alternatives to a project or its location that can feasibly avoid or substantially lessen the significant effects of the proposed Project. **Section 4.0, Environmental Impact Analysis**, of this EIR concludes that Project implementation would result in significant and unavoidable environmental impacts. These include short-term construction equipment emission impacts, short-term construction equipment noise and vibration impacts during construction, long-term exterior noise along North Central Avenue, long-term recreation impacts, and cumulative solid waste disposal, recreation, fire, and police impacts. In response to these impacts, the City of Glendale identified and considered several alternatives to the proposed Project to determine if these alternatives could avoid or substantially lessen these significant impacts.

Alternative 1 – No Project/No Development Alternative

The No Project/No Development Alternative is required to be evaluated by Section 15126(2)(4) of the *CEQA Guidelines*. As required by the *CEQA Guidelines*, the analysis must examine impacts that 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 that is consistent with available infrastructure and community services. Under the No Project/No Development Alternative, the Project site would not be developed with additional uses and would remain in its current state.

Alternative 2 – Reduced Density Development of Site B Only (62-Percent Reduction)

The exclusive Development of Site B would represent a 62-Percent Reduced Density Alternative. This alternative only considers the development associated with Site B (2 acres). This alternative would include the development of 192 residential units, on-site amenities, and parking. The residential building would include a five-story building wrapped around a parking structure consisting of 275 parking spaces; 10 short-term, secure bicycle spaces; and 48 long-term, secure bicycle spaces. The maximum height of the structure would be approximately 70 feet above grade with the roof deck at approximately 79 feet from above grade. This alternative would allow for the development to be reduced to one residential building with associated parking on one site. The layout for land uses under this alternative would not change.

Alternative 3 – Reduced Density Development of Site A Only (38-Percent Reduction)

The exclusive development of Site A would represent a 38-Percent Reduced Density Alternative. This alternative considers only the development associated with Site A (3.46 acres). Site A would be developed with a five-story residential building consisting of 315 residential units and on-site amenities, including a fitness center, courtyards, pool deck, and parking. The residential building includes five stories of residential units wrapped around a parking structure accommodating 456 parking spaces; 16 short-term, secure bicycle spaces; and 79 long-term, secure bicycle spaces. The maximum height of the structure would be approximately 70 feet above grade with the roof deck at approximately 73 feet from above grade. The layout for land uses under this alternative would not change.

Environmentally Superior Alternative

According to *CEQA Guidelines*, 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. The alternatives were considered because they would avoid or lessen the significant and unavoidable air quality, noise, cumulative solid waste disposal, recreation, fire, and police impacts identified for the Project. All the cumulative impacts identified were already recognized by the City of Glendale during the approval of the DSP.

Of the other alternatives considered, Alternative 2 – Reduced Density Development of Site B Only (62-Percent Reduction) would be considered environmentally superior, because it would result in the greatest incremental reduction of the overall level of impact when compared to the Project due to the reduction in intensity of the Project. However, the only significant and unavoidable impact this alternative would eliminate would be air quality. Overall, the significant and unavoidable cumulative

solid waste disposal, recreation, fire, and police impacts would not be eliminated by this alternative. This alternative would meet the majority of the objectives of the Project, but to a substantially lesser degree (such as less tax revenue, employment opportunities, the redeveloping of underutilized property to provide additional residential opportunities, etc.). In addition, the development density and resulting revenue due to the size of the alternative may not be sufficient to offset the cost of the land and may not be economically feasible to the applicant for this reason.

3.0 RESPONSES TO COMMENTS

INTRODUCTION

This section of the Final Environmental Impact Report (EIR) presents copies of comments on the Draft EIR received in written form during the public review period, and it provides the City of Glendale's (City) responses to those comments. Each comment letter is numbered and the issues within each comment letter are bracketed and numbered. Comment letters are followed by responses, which are numbered to correspond with the bracketed comment letters.

The City's responses to comments on the Draft EIR represent a good-faith, reasoned effort to address the environmental issues identified by the comments. Under the California Environmental Quality Act (CEQA) Guidelines, the City is not required to respond to all comments on the Draft EIR, but only to those comments that raise environmental issues. Refer to *CEQA Guidelines* Section 15088(a). Case law under CEQA recognizes that the City need only provide responses to comments that are commensurate in detail with the comments themselves. In the case of specific comments, the City has responded with specific analysis and detail; in the case of a general comment, the reader is referred to a related response to a specific comment, if possible. The absence of a specific response to every comment does not violate CEQA if the response would merely repeat other responses

Organization and Table of Comment Letters

The City received a total of eight comment letters from state agencies, regional agencies, local agencies, and other organizations and individuals. **Table 3.0-1, Comment Letters Received on the North Central Avenue Apartment Project Draft EIR** provides a list of all comment letters received and the identification number for each letter.

**Table 3.0-1
Comment Letters Received on the North Central Avenue Apartment Project Draft EIR**

Agency/Entity/Individual	Name of Commenter	Date of Comment	Letter No.
State Agencies			
State of California, Native American Heritage Commission	Dave Singleton, Program Analyst	August 20, 2013	1
State of California, Department of Transportation	Dianna Watson, IGR/CEQA Branch Manager	October 3, 2013	2
Regional Agencies			
South Coast Air Quality Management District	Ian MacMillan, Program Supervisor	September 27, 2013	3
Local Agencies			
County of Los Angeles, Department of Public Works	Toan Duong, Land Development Division	September 19, 2013	4
Other Organizations and Individuals			
n/a	Alex Aliksanian	September 14, 2013	5
Park Towers	Victor Maling, Secretary, Board of Directors	September 24, 2013	6
Citizens Advocating Rational Development	Nick Green, President	Undated	7
The Glendale Historical Society	Greg Grammer, President	September 25, 2013	8

Letter No. 1

STATE OF CALIFORNIA

NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Boulevard
West Sacramento, CA 95691
(916) 373-3715
(916) 373-5471 – FAX
e-mail: ds_nahc@pacbell.net

Edmund G. Brown, Jr., Governor

2013 AUG 26 PM 3:17

PLANNING DIVISION

August 20, 2013

Mr. Erik Drause, Planner

City of Glendale Community Development

Planning Division

613 East Broadway, Room 103
Glendale, CA 91206

RE: SCH#2013051031 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the "North Central Avenue Apartment Project (Two Five-Story Structures, 507 Units);" located in the City of Glendale; Los Angeles County, California

Dear Mr. Krause:

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 that causes a substantial adverse change in the significance of an historical resource, 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,

1

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 archeological resources does not preclude their subsurface existence.

Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological 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 Native Americans. 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,


Dave Singleton
Program Analyst

CC: State Clearinghouse

Attachment: Native American Contacts list

**Native American Contacts
Los Angeles County
August 20, 2013**

Beverly Salazar Folkes
1931 Shadybrook Drive
Thousand Oaks, CA 91362
folkes9@msn.com
805 492-7255
(805) 558-1154 - cell
folkes9@msn.com

Chumash
Tataviam
Fernandeno

Kitanemuk & Yowlumne Tejon Indians
Delia Dominguez, Chairperson
115 Radio Street
Bakersfield, CA 93305
deedominguez@juno.com
(626) 339-6785

Yowlumne
Kitanemuk

Fernandeno Tataviam Band of Mission Indians
Larry Ortega, Chairperson
1019 - 2nd Street, Suite #1
San Fernando CA 91340
(818) 837-0794 Office

(818) 837-0796 Fax

Fernandeno
Tataviam

San Fernando Band of Mission Indians
John Valenzuela, Chairperson
P.O. Box 221838
Newhall, CA 91322
tsen2u@hotmail.com
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(760) 885-0955 Cell
(760) 949-1604 Fax

Fernandeno
Tataviam
Serrano
Vanyume
Kitanemuk

LA City/County Native American Indian Comm
Ron Andrade, Director
3175 West 6th St, Rm. 403
Los Angeles, CA 90020
randrade@css.lacounty.gov
(213) 351-5324
(213) 386-3995 FAX

Gabrielino /Tongva Nation
Sandonne Goad, Chairperson
P.O. Box 86908
Los Angeles, CA 90086
sgoad@gabrielino-tongva.com
951-845-0443

Gabrielino Tongva

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

Gabrielino Tongva

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
P.O. Box 490
Bellflower, CA 90707
gtongva@verizon.net
562-761-6417 - voice
562-761-6417- fax

Gabrielino Tongva

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 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2013051031; draft Environmental Impact Report (DEIR) for the North Central Avenue Apartments Project; located in the City of Glendale; Los Angeles County, California.

1. Letter from California Native American Heritage Commission, Dave Singleton, dated August 20, 2013

Response 1

The Native American Heritage Commission (NAHC) letter recommends contacting the appropriate information center for a records search to determine what potential cultural resources will be encountered on site, and if recommended by the information center, undertaking an archaeological survey. In response, the City determined that this was not required based on the conclusion contained within the Draft EIR. As presented in the Draft EIR on page 4.3-36, prehistoric and historic archaeological sites are not known to exist within the local area. In addition, the project site has already been subject to extensive disruption and contains fill materials. Any archaeological resources that may have existed at one time are very likely to have been previously disturbed. Therefore, there is no evidence of the likelihood that prehistoric or historic cultural remains are contained within the project site.

Nonetheless, construction activities associated with project implementation would have some potential to unearth undocumented resources and result in a significant impact. The NAHC letter notes that the lack of surface evidence of archeological resources does not preclude their subsurface existence. The NAHC letter also states that lead agencies should include provisions for the identification and evaluation of accidental discoveries of archaeological resources and provisions for recovering artifacts. In response, the City included a mitigation measure into the Draft EIR, which shall be incorporated into the Mitigation Monitoring and Reporting Program (MMRP) to be adopted for the project should it be approved. Implementation of these standard mitigation requirements would reduce potential impacts to a level that is less than significant. These mitigation measures include the following:

4.3-1 In the event that archaeological resources are unearthed during Project subsurface activities, all earth-disturbing work within a 200-meter 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.

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 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, reburial).

With the inclusion of the previous mitigation measures, all impacts to cultural resources would be less than significant.

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, REGIONAL PLANNING
IGR/CEQA BRANCH
100 MAIN STREET, MS # 16
LOS ANGELES, CA 90012-3606
PHONE: (213) 897-9140
FAX: (213) 897-1337



*Flex your power!
Be energy efficient!*

October 03, 2013

Mr. Erik Krause
City of Glendale Planning
633 E. Broadway
Glendale, CA 91206

IGR/CRQA No. 130520ZJ/NOP
North Central Avenue Apartments
Vic. LA-134, PM 6.93 to 11.206
Vic. LA-5, PM 27.535 to 44.313
Vic LA-2, PM 19.394 to 31.212
SCH#2013051031

Dear Mr. Krause:

Thank you for including the California Department of Transportation (Caltrans) in the draft environmental impact report (DEIR) review process for the proposed North Central Avenue Apartment Project. The project site is located opposite sides of Central Avenue near the intersections Doran Street in the City of Glendale California.

The project consists of two sites, A and B. Site A is located in the 600 block of North Central Avenue and is bound the Pioneer Drive, on the east. Site B is located in the 500 block of North Central Avenue and is bound on the north by Doran Street.

After reviewing the DEIR, Caltrans observed that a few of the comments in the Notice of Preparation (NOP) letter dated June 17, 2013 were not addressed. The Caltrans NOP letter requested the following;

- 1. A traffic analysis at the intersection of the West Bound (WB) off ramp to Brand Boulevard. Please include a queue analysis. 1
- 2. Please look at Table 4.10-7 (page 4.10-20) for intersection 2 in PM peak. The V/C for existing and existing plus project is the same yet the LOS is different—one is LOS C and the other is LOS B. 2

If you have any questions about preparing a traffic study on the State Highway and study locations, you may reach Zeron Jefferson, project coordinator at (213) 897-0219 and please refer to record number 130520/ZJ.

Sincerely,

DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

2. Letter from California Department of Transportation, Dianna Watson, dated October 3, 2013

Response 1

A traffic queuing analysis at the Brand Boulevard at Goode Avenue/State Route 134 (SR-134) West Bound (WB) off-ramp was prepared as requested by California Department of Transportation and is included in **Appendix B** of this Final EIR.

Existing Traffic Conditions - The Brand Boulevard at Goode Avenue/SR-134 WB off- ramp intersection is currently a signalized intersection. The westbound SR-134 WB off-ramp approach at the intersection has one left-turn lane, one shared through/left turn lane, and one shared through/right turn lane. The northbound Brand Boulevard approach at the intersection has two left turn lanes and three through lanes. The southbound Brand Boulevard approach at the intersection has three through lanes and a de facto right-turn lane. The west leg of the intersection (Goode Avenue) has two one-way westbound lanes.

Project Trip Generation - Trip generation rates were determined for daily traffic, morning peak-hour inbound and outbound traffic, and evening peak-hour inbound and outbound traffic for the proposed land uses. By multiplying the trip generation rates by the land use quantities, the traffic volumes were determined. **Table 1** presents the trip generation rates, project peak-hour volumes, and project daily traffic volumes. The trip generation rates are from the Institute of Transportation Engineers, Trip Generation, 9th Edition, 2012. From the July 2013 traffic study prepared for the proposed Project as contained within **Appendix 4.10** of the Draft EIR, the proposed development is projected to generate the following net trips during the peak hours:

**Table 1
Project Trip Generation**

Land Use	Quantity	Units	AM Peak Hour			PM Peak Hour			Daily
			Inbound	Outbound	Total	Inbound	Outbound	Total	
<u>Trip Generation Rate</u>									
Apartments		DU	0.10	0.41	0.51	0.40	0.22	0.62	6.65
Medical Office		TSF	1.89	.5	2.39	1.00	2.57	3.57	36.13
<u>Existing Trips</u>									
Apartments	20	DU	2	8	10	8	4	12	133
Medical Office Site A	59,611	TSF	113	30	143	60	153	213	2,154
Medical Office Site B	30,582	TSF	58	15	73	31	79	110	1,105

Subtotal Existing			173	53	226	99	236	335	3,392
<u>Project Trips</u>									
Apartment	507	DU	51	208	259	203	112	315	3,372
Net Trips			-122	155	33	104	-124	-30	-20

Source: Institute of Transportation Engineers, Trip Generation, 9th Edition, 2012,

Abbreviations: DU = dwelling units; TSF = Thousand Square Feet; AM Peak Hour = 7:00 AM to 9:00 AM; PM Peak Hour = 4:00 PM to 6:00 PM.

The proposed Project only contributes a net inbound increase on the Brand Boulevard at Goode Avenue/SR-134 WB off-ramp during the evening peak hour. Therefore, only the evening peak hour was evaluated at the Brand Boulevard at Goode Avenue/SR-134 WB off-ramp intersection.

Traffic and Queuing Analysis - Utilizing the traffic volumes, the intersection lane configurations, and traffic signal timing and phasing information, the traffic and queuing analyses were performed using the Highway Capacity Manual (HCM) 2010 methodology implemented in the Highway Capacity Software (HCS) 2010. The following details and performance characteristics were input:

- Movement group including individual lanes whose performance characteristics are being measures.
- Storage length available for each of the turning movements (in feet).Traffic volumes (VPH) during the evening peak hour.
- The 85th percentile queue lengths (in vehicles) during the evening peak hour for each turning movement on the ramp.
- The 85th percentile queue to storage ratio during the evening peak hour for each turning movement.
- If 85th percentile queue exceeds the storage length for each turning movement.
- Intersection delay in seconds per vehicle during the evening peak hour.
- Levels of Service during the evening peak hour.

Based on the queuing analysis, the Brand Boulevard at SR-134 WB off-ramp is operating at an acceptable Level of Service for existing traffic conditions and the 85th percentile queues are not exceeding the available storage nor extending to the freeway mainline during the evening peak hour. In addition, the Brand Boulevard at SR-134 WB off-ramp is projected to operate at an acceptable Level of

Service for existing plus project traffic conditions and the 85th percentile queues are not projected to exceed the available storage nor extend to the freeway mainline during the evening peak hour.

Response 2

The comment is noted and the Level of Service (LOS) has been corrected in the Final EIR. The LOS in **Table 4.10-7** should have been B and not C. This does not change the less than significant impact conclusion for the Central Avenue at SR-134 Freeway EB Ramp/Sanchez Drive intersection.

SENT VIA USPS AND E-MAIL:
ekrause@ci.glendale.ca.us

September 27, 2013

Mr. Erik Krause, Principal Planner
Planning Division
City of Glendale
633 E. Broadway, Room 103
Glendale, CA 91206-4386

Draft Environmental Impact Report (Draft EIR) for the Proposed North Central Avenue Apartments Project (SCH No. 2013051031)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

In the project description, the lead agency proposes demolition and removal of materials from the existing structures on two separate sites: Site A and Site B. Site A is approximately 3.46-acres in size and includes construction of a 5-story apartment building with 315 units with a parking structure for 456 parking spaces. The approximately 2-acre Site B would include construction of a 5-story apartment building for 192 apartment units and include a 275-space parking structure. Construction is planned to start in June 2014 and be completed in approximately 23 months.

The two proposed sites are located south of the State Route 134 Freeway, which has a daily traffic volume of about 232,000 vehicles passing approximately 330 feet north of the proposed project most northern boundary. The SCAQMD staff is concerned that the proposed sensitive land use site is located in a traditionally incompatible setting with the existing freeway near the project site. Guidance from the California Air Resources Board (CARB) Air Quality and Land Use Handbook¹ recommends avoiding siting new sensitive land uses within 500 feet of a freeway to avoid exposing sensitive receptor populations, such as people who live in homes or apartments, to substantial pollutant concentrations. SCAQMD staff appreciates that the lead agency conducted a health risk assessment (HRA) to determine potential impacts from the freeway, however some of the methods used in the HRA do not conform to SCAQMD guidance. We recommend that the HRA be updated based on the comments in this letter prior to the lead agency determining the significance of this impact. Details are included in the attachment.

¹ (CARB) Air Quality and Land Use Handbook:
http://www.aqmd.gov/ceqa/handbook/other_useful_links/ARBhandbook.pdf.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

1

Sincerely,



Ian MacMillan
Program Supervisor, Intergovernmental Review
Planning, Rule Development & Area Sources

Attachment

IM:GM

LAC130813-03
Control Number

Health Risk Assessment Methodology

1. SCAQMD staff appreciates that the lead agency conducted a health risk assessment (HRA), including an analysis of criteria pollutants, to determine potential impacts to project residents from the nearby SR134 freeway. While we did receive all of the technical calculations and modeling from the HRA, we did not see an actual HRA report with text describing the technical analysis other than the description within chapter 4.2 of the EIR. In our review of the technical materials, we found several calculations that are contrary to SCAQMD guidance. We recommend that the HRA and criteria pollutant dispersion modeling analysis be revised as necessary to correct these inconsistencies prior to making a determination regarding the significance of this impact.

2

- a. **30-Year Exposure Period** - The analysis uses a 30-year exposure period to determine potential health impacts. While there may be evidence in the record that residents are not expected to live longer than this at the proposed project, there is no limit to residents doing so. In addition, SCAQMD's threshold used to determine significance (e.g., 10 in one million) is based on a presumed 70-year lifetime exposure period. If the lead agency wants to continue to use a 30 year exposure period, then substantial evidence needs to be provided demonstrating that the 10 in one million threshold is still applicable as it does not conform to SCAQMD guidance.

3

Further, while some newer guidance from the state Office of Environmental Health Hazard Assessment (OEHHA) includes 30-year exposure periods for residential exposure, a number of other exposure parameters are also updated. If this newer guidance is used to justify the shorter exposure period, then all of the other exposure parameters should also be updated in the HRA. We note that OEHHA has not completed their newer HRA guidance and SCAQMD still recommends using methodologies from the existing guidance, including use of a 70-year exposure period.

- b. **Number of Diesel Trucks** - The emission calculations for both the HRA and the criteria pollutant analysis assume that only 258 diesel cars and trucks per hour (6192 per day) travel along this portion of the SR 134 based on a default LA County vehicle fleet. However, truck counts from Caltrans² indicate that more than 9000 trucks per day travel along this portion of the SR 134, approximately one third higher than assumed in the EIR analysis. The HRA and criteria pollutant analyses should be updated with these larger diesel vehicle emissions.

4

- c. **Non-Regulatory Default Option in AERMOD** - The HRA dispersion modeling analysis used the non-regulatory default option in the AERMOD model. AERMOD should only be run as a regulatory default for this

5

² <http://traffic-counts.dot.ca.gov/truck2011final.pdf>

application. One of the parameters modified in the non-regulatory default option include the urban roughness length. This value was set to the surface roughness length provided by SCAQMD for the Burbank meteorological data. The urban roughness length is not the same value as the surface roughness length³, and should not be changed from the default value of 1.0.

5

d. **Filtration Effectiveness** – The materials provided to SCAQMD staff did not contain an analysis demonstrating that the filter mitigation would effectively reduce pollutant concentrations to a less than significant level for project residents. In particular, it is not clear from materials available that the filtration effectiveness considered:

- time spent outdoors,
- time with windows or doors left open,
- long term maintenance and replacement of these filters (e.g., new filters are generally required approximately every six months),
- the inability of particulate filters to reduce gaseous concentrations, such as benzene or other toxic air contaminants

6

Construction Mitigation

2. The EIR demonstrates that construction of the project will result in significant regional impacts for both NO_x and ROG. The CalEEMod analysis shows that ROG is exceeded during painting of the building. Mitigation measure 4.2-2 should address some of this impact; however its effectiveness is not quantified in the EIR.

7

NO_x is generally exceeded due to the amount of off-road construction equipment that will be used onsite, however no mitigation has been suggested to reduce this impact. Offroad equipment with lower NO_x emissions is commercially available today to reduce these impacts. The lead agency should consider adopting a schedule similar to what other lead agencies in the region (including Port of Los Angeles, Port of Long Beach, LA County Metro, and City of Los Angeles)⁴ require for all on-site construction equipment.

- Project start, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 3 off-road emission standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

8

³ See the AERMOD Implementation Guide here:

http://www.epa.gov/scram001/7thconf/aermod/aermod_implmntn_guide_19March2009.pdf

⁴ For example see the Metro Green Construction Policy at:

http://www.metro.net/projects_studies/sustainability/images/Green_Construction_Policy.pdf

- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
- A copy of each unit’s certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.
- Encourage construction contractors to apply for SCAQMD “SOON” funds. Incentives could be provided for those construction contractors who apply for SCAQMD “SOON” funds. The “SOON” program provides funds to accelerate clean up of off-road diesel vehicles, such as heavy duty construction equipment. More information on this program can be found at the following website:
<http://www.aqmd.gov/tao/Implementation/SOONProgram.htm>

3. Letter from South Coast Air Quality Management District, Ian McMillan, dated September 27, 2013

Response 1

The comment is an introductory paragraph thanking the City for providing the Draft EIR to the South Coast Air Quality Management District (SCAQMD) for review and describing the proposed Project. As discussed in this comment, the City of Glendale prepared a Health Risk Assessment (HRA) as part of the Draft EIR due to the proximity of the site to State Route 134. The technical review comments on the HRA referenced in these comments are identified in the following as SCAQMD letter comments 2 through 6, and responses are provided to these comments.

The SCAQMD also requested that written responses to the comments included in this letter be provided prior to certification of the Final EIR as required by CEQA. The City will comply with this requirement by providing written responses to all comments from public agencies, including the SCAQMD.

Response 2

The HRA Report was sent by email to Ian McMillan at the SCAQMD on August 13, 2013. Receipt of the HRA Report was acknowledged by email by SCAQMD staff. In addition, receipt of the HRA Report and all model files was confirmed in a follow-up telephone call to SCAQMD staff. Responses to specific comments on the HRA are provided in responses 3 through 6, which follow.

Response 3

The HRA utilized relevant and appropriate procedures to quantify risk. Under available risk assessment guidance, variable exposure adjustments can be utilized to quantify risk. Acceptable levels of risk or thresholds are established regardless of exposure duration.

In Section 6.0 of the HRA, exposure duration is discussed relative to residential occupancy. As noted, the HRA is based on the U.S. Environmental Protection Agency's (USEPA's) guidance to develop viable dose estimates based on reasonable maximum exposures, which are defined as the "highest exposure that is reasonably expected to occur." The commenter should note USEPA's long-standing guidance for the development of dose estimates based on what is defined as "reasonable." According to the USEPA:

Reasonableness refers to the findings of the risk assessment in the context of the state-of-the science, the default assumptions and the science policy choices made in the risk assessment. It demonstrates that the risk assessment process followed an acceptable, overt logic path and retained common sense in applying relevant guidance. The assessment is based on sound judgment. Reasonableness is achieved when: a) the risk characterization is determined to be sound by the scientific

community, EPA risk managers, and the lay public, because the components of the risk characterization are well integrated into an overall conclusion of risk which is complete, informative, well balanced, and useful for decision making b) the characterization is based on the best available scientific information c) the policy judgments required to carry out the risk analyses use common sense given the statutory requirements and Agency guidance d) the assessment uses generally accepted scientific knowledge e) appropriate plausible alternative estimates of risk under various candidate risk management alternatives are identified and explained.

The USEPA (*Risk Assessment Guidance for Superfund -Volume 1: Human Health Evaluation Manual*) introduced the concept of reasonable maximum exposures (RMEs). This approach is intended to estimate a conservative exposure case (i.e., well above the average case) that is representative of the range of possible exposures. Activity patterns for population mobility are specifically addressed in the *Exposure Factors Handbook* (U.S. EPA, 1997), whereby lifetime risk values for residents account for an exposure duration of 30 years (95th percentile).

Additionally, the Integrated Public Use Microdata Series (IPUMS-USA) census data was reviewed to determine an appropriate assumption for length of residency to determine the exposure duration used in the analysis. The IPUMS-USA database consists of more than 50 samples of the American population drawn from 15 federal censuses and from the American Community Surveys (ACS). ACS is a nationwide survey that collects and produces population and housing information every year from 3 million selected housing unit addresses across every county in the nation. IPUMS-USA samples, which draw on every surviving census from 1850 to 2000 and the 2000 to 2009 ACS samples, collectively constitute the quantitative information on long-term changes in the American population. Based on this review, the most recent IPUMS-USA ACS data (2006 to 2009) show that the percentage of California households with a residency period of 30 years or greater is less than 9 percent, meaning that over 91 percent of California residents had lived in their current location for less than 30 years. This data also showed that over 63 percent of Californians have lived at their current residence for 9 years or less.

Furthermore, in a study prepared by the Real Estate Research Institute (*Duration of Residence in the Rental Housing Market, January 2002*) the duration of residency in rental housing was evaluated. The study utilized data from the Bureau of Labor Statistics' (BLS) Consumer Price Index (CPI) to construct the duration of rental occupancy for metropolitan areas from 1987 to 1998. The American Housing Survey and related metropolitan economic data were additionally employed to proxy time-varying covariates of duration of residence. Results of the study showed that the duration of residency across individual units and market segments for 3, 5, and 10 years were 62.6, 78.6, and 96.7 percent, respectively. Clearly, 30 years is a reasonable estimate of the 90th or 95th percentile of residency duration in a population.

This information supports the use of a 30-year exposure period in the HRA instead of the 70-year exposure period recommended by the SCAQMD.

Response 4

The comment assumes that the Caltrans database reports only diesel trucks. This database actually includes all two- through five-axle trucks (pickup and vans with only four tires are excluded) regardless of fuel type, so the 9,000 trucks per day referenced in this comment includes diesel and nondiesel vehicles. The assumption on the number of diesel vehicles on the segment of SR-134 analyzed of approximately 6,200 vehicles, which is equivalent to 69 percent of the 9,000 trucks identified in the Caltrans data, is a reasonable assumption.

The HRA utilized Caltrans annual average daily traffic counts for the roadway and ramp segments located within $\frac{1}{4}$ of a mile of the proposed Project. The use of the population profiles from the California Air Resources Board on-road emission factor model for the L.A. County vehicle fleet are appropriate and provide an empirical methodology to identify the number and type of diesel vehicles traversing the main freeway link and adjoining on- and off-ramps. Revision to the diesel vehicle counts used in the HRA is not warranted.

Response 5

This comment refers to SCAQMD guidance on air dispersion modeling (http://www.aqmd.gov/smog/metdata/AERMOD_ModelingGuidance.html), which allows for the use of nonregulatory default options such as flat terrain and the NO_x to NO₂ conversion algorithms. It is relevant to note that specific guidance was provided by the SCAQMD for a similar freeway analysis recommending the use of AERMOD “to determine NO₂ impacts.”¹ The HRA provides a relevant discussion for inclusion of these model options and documents their application in a manner consistent with regulatory guidance.

The comment also notes that there is a distinction between urban and surface roughness lengths and that the default value of 1.0 should not be changed. Guidance provided in *The Development of AERMOD-Ready Meteorological Data for the South Coast Air Basin and the Coachella Valley, Final Report, Volume I*, notes:

1 Memorandum from Ian MacMillan to Hadar Plafkin, Draft Environmental Impact Report (Draft EIR) for the Proposed II Villaggio Toscano Project, March 2011.

Although the surface files provided to AQMD implicitly account for urban roughness effects because they are constructed using data from urban measurement sites, it might still be necessary to account for additional urban effects by (a) invoking the “URBAN” option when AERMOD is run to account for changes in surface characteristics that occur between the meteorological measurement site and the source/receptor location.

Although this comment does not identify a specific technical reason why the initial value of 0.532 meters is inappropriate, the HRA was revised to reflect a less conservative roughness value of 1.0 meter to limit further discussion. This revision does not change the overall conclusion of the HRA. A revised HRA is included as **Appendix A** to this Final EIR.

Response 6

The HRA identified the use of particulate filters to limit pollutant concentrations by applying recognized control efficiencies to produce subsequent values for comparison to regulatory thresholds. The control efficiencies utilized to identify ventilation performance standards were based on the reported minimum efficiency reporting values (MERV) as identified in the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2. Based on the reported effectiveness of these filters, a recommendation to limit the infiltration of particulates into residential occupancies was identified as the appropriate mitigation measure to reduce carcinogenic risk estimates to within acceptable limits and to reduce particulate exposures to a less than significant level. This was accomplished by installing corresponding particulate filters that conform to ASHRAE Standards.

A consideration of time spent in or outdoors is not considered in the HRA. Regulatory guidance assumes that source-receptor locations are static, whereby exposures are assumed to be continuous based on the averaging time under consideration.

Please refer to SCAQMD’s *Pilot Study of High Performance Air Filtration for Classrooms Applications* to address their concern for filter efficiency associated with a scenario of open doors and windows. The SCAQMD report clearly shows that adequate particulate removal is achieved with “doors and windows that are frequently open to outside air” to meet the limited control requirements for the proposed Project.

The maintenance and continued operation of the filter will be the responsibility of the building owner and will be monitored as required by Mitigation Measure 4.2-5, which is included in the Mitigation Monitoring and Reporting Program (MMRP).

The efficacy of particulate filters to trap gaseous pollutants has been documented by many sources, including the USEPA.² The mitigation measure was not designed to control gaseous pollutants because their contribution to the cancer risk estimate was determined to be *de minimus* (i.e., less than significant). Diesel particulates from both trucks and vehicles contributed to more than 75 percent of the reported cancer risk values. By reducing the concentration of diesel particulate through filtration, the carcinogenic risk estimates were reduced, thereby reducing the risk estimates to within acceptable limits. For exposures to particulates such as PM₁₀, filtration control efficiencies were directly applied to the exposure point concentration to reduce exposures below significance thresholds. There were no exceedances of identified significance thresholds associated with chronic/acute noncarcinogenic exposures or exposures to criteria pollutants associated with mobile source combustion (e.g., carbon monoxide, nitrogen dioxide).

Response 7

The mitigation measure proposed to reduce ROG/VOC emission is an effective means to reduce emission associated with architectural coatings. In fact, this mitigation measure has been proposed by SCAQMD on projects within the Basin that exceed ROG/VOC thresholds on numerous occasions. Given the level of what is known about the proposed Project, the precise quantification of ROG/VOC emission reductions cannot be determined accurately. For example, it cannot be determined precisely how much pre-painted construction materials and construction materials that require no painting will be used. SCAQMD was consulted on the best method to respond to this comment and to provide quantification. SCAQMD indicated for the City of Glendale to use a best estimate of the amount of interior and exterior square footages the measure may be applied. It is assumed that these measures could be applied between approximately 10 to 20 percent of the interior and exterior square footages with a corresponding 10 to 20 percent in reduction in ROG/VOC. This would reduce ROG/VOC by approximately 15 to 30 pounds per day but would not reduce the emissions below SCAQMD thresholds. For this reason, the lead agency has determined that this impact would be considered to be significant and unavoidable.

Response 8

The following has been added to the Final EIR:

2 U.S. Environmental Protection Agency, "Residential Air Cleaners (Second Edition): A Summary of Available Information, Revised August 2009," <http://www.epa.gov/iaq/pubs/residair.html#summary>.

4.2-3 Project start to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

4.2-4 Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

A copy of each will be provided at the time of mobilization of each applicable unit of equipment.

The comment is noted for the applicant and decision maker regarding the SCAMD SOON funds being available.

September 19, 2013

Mr. Erik Krause
 Community Development Department, Planning Division
 City of Glendale
 633 East Broadway, Room 103
 Glendale, California 91206

Dear Mr. Krause:

**NOTICE OF PREPARATION (NOP) OF A DRAFT ENVIRONMENTAL IMPACT
 REPORT (DEIR)
 NORTH CENTRAL AVENUE APARTMENT PROJECT
 CITY OF GLENDALE**

Thank you for the opportunity to review the NOP of a Draft Environmental Impact Report (DEIR) dated May 8, 2013, associated with the North Central Avenue Apartment Project located on Central Avenue near the intersection of Doran Street in the City of Glendale. The project proposes to develop 507 multi-family residential apartment units. Site A and Site B are located at the opposite sides of Central Avenue near the intersection of Doran Street. Site A would construct 315 apartment units and Site B would construct 192 apartment units.

1

The following comments are County of Los Angeles, Department of Public Works and are for your consideration and relate to the environmental document only:

Hydrology and Water Quality:

1. Section 6, Effects Found Not To Be Significant, Item F, Hydrology and Water Quality, third paragraph, page 6.0-9; Replace "County" with "City of Glendale" in the sentence, "*Prior to issuance of any grading or building permits, the County must approve the SUSMP.*" The County of Los Angeles does not review or approve any on-site water quality permits within City of Glendale's jurisdiction.

2

For questions regarding the Hydrology and Water Quality comments above, please contact Mr. Toan Duong of Land Development Division at (626) 458-4921 or tduong@dpw.lacounty.gov.

Mr. Erik Krause
September 19, 2013
Page 2

If you have any other questions or require additional information, please contact Ruben Cruz at (626) 458-4910 or rcruz@dpw.lacounty.gov.

4. Letter from County of Los Angeles, Department of Public Works, Toan Duong, dated September 19, 2013

Response 1

The comment is an introductory paragraph that merely thanks the City for sending the document and describes the proposed Project. The comment does not pertain to the adequacy of the Draft EIR and no further response is required.

Response 2

The text has been modified in the Final EIR to change “County” to “City” of Glendale. This change does not change the conclusion of the EIR, and no further response is required.

Letter No. 5

September 14, 2013

Erik Krause
Principal Planner
City of Glendale Planning Division
633 E. Broadway, Room 103
Glendale, CA 91206-4386

2013 SEP 23 PM 3:39

PLANNING DIVISION

RE: North Central Avenue Apartments Project
Environmental Impact Report

Dear Mr. Krause:

I read with great amusement the EIR for subject project. It is amazing to me that a company is paid a handsome fee to put out such nonsense. I live at Park Towers on Pioneer and am against this project for the following reasons:

1. The EIR states "no significant impact" to traffic flow at the area. Why am I not surprised. The traffic at Pioneer and Central is horrendous without this project. Adding 507 apartments, equivalent of at least 2,000 people and 1,000 cars, will make living and working impossible for us.
2. The EIR makes no mention of the alley between Doran and Pioneer. The alley is used by a lot of people who live and/or work on Pioneer to get on Pioneer while traveling north on Central. Since it is ALMOST IMPOSSIBLE to turn from Central to Pioneer during rush hour, the alley is the next best option, short of going to Columbus. The alley, as I understand, is owned by the City. Who decided to dedicate it to the developer and at what cost? Shouldn't the developer provide an easement through the project to allow drivers access to Pioneer? Answer: Off course not.
3. What about the project known as Nexus? Isn't that adding another 235 units to the mix. Again, that's another 1,000 people and 500 cars. Why is the developer not accounting for it in the pretty drawings he has in the package. His overhead shots of the area still show the building across from Pioneer, which was demolished some time ago and construction is already under way. At the least he should supplement the package to reflect current and future mess at the intersection.
4. Traffic exiting the freeway is getting heavier every year. The traffic light at Pioneer and Central does not have an arrow to allow north bound traffic to turn to Pioneer. This makes sense, since a left turn arrow will slow freeway traffic further. So what happens to the residents and employees who will no longer be able to turn to Pioneer, once 750 units pop in this one small area. The traffic study does not mention that.
5. The traffic heading east bound from Central along Sanchez to Brand and onto the freeway is already backing up to Central. What will happen when 750 more units pop into the intersection. The traffic study does not mention that either.
6. Finally, the current use at subject site has minimal impact to the traffic and space density in the area. The offices are short rises with limited amount of people in and out and only during working hours. These huge, five story buildings, will cause pollution during construction, cramp the area, eliminate a VITAL ALLEY and cause unbelievable traffic jams. The only thing this project will accomplish is to make a lot of money for some people.

1

2

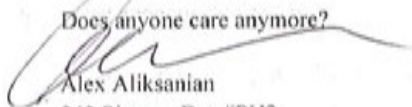
3

4

5

6

Does anyone care anymore?


Alex Aliksonian
343 Pioneer Dr., #PH2
Glendale, CA 91203
818-441-9118

5. Letter from Alex Aliksanian, dated September 14, 2013

Response 1

The traffic study states that Central Avenue is currently undergoing construction not related to the Project site. Lane closures and delays are expected during the temporary street construction, making the traffic conditions frustrating to commuters at times. The Central Avenue & Adjacent Streets Improvement Project is scheduled from January 2013 to November 2013 and includes the following:

- Reconstruction of Central Avenue pavement using the existing asphalt concrete by the environmentally friendly Cold Central Plant Recycling (CCPR) or Cold-Mix Asphalt Recycling process
- Relocation of catch basins and of street light poles and the replacement of ornamental light poles
- Construction of integral curbs and gutters, driveway approaches, sidewalks, and bus deceleration pads
- Selective removal and replacement of deteriorated asphalt concrete (AC) pavement
- Placement of asphalt rubber hot mix (ARHM) over AC pavement leveling course
- Modification of six traffic signal systems
- Removal of 102 existing sidewalk trees in poor health and planting of 177 new trees
- Installation of landscaped median adjacent to the Americana at Brand and the Galleria between Colorado Street and the Americana Way, installation of bus shelters, and installation of fiber optic communication system
- Installation of striping and other pavement markings

As shown in **Table 4.10-4, Project Trip Generation** of the EIR, a trip generation comparison of the existing land uses versus the proposed land use has been conducted for the Project site. The existing land uses currently consist of 20 apartment dwelling units, 59,611 square feet of medical/dental office buildings on Site A, and 30,582 square feet of medical/dental office buildings on Site B. The proposed Project is projected to generate approximately 20 less daily vehicle net trips, 30 less evening peak hour trips, and 33 more morning peak hour trips. As shown in **Table 4.10-7, Existing Plus Project Level of Service**, the proposed development is not projected to contribute a significant impact to the Central Avenue at Pioneer Drive intersection for future traffic conditions.

Response 2

An alley is considered a public easement and is not classified in the City of Glendale Circulation Element as a roadway. The primary function of an alley is to provide access to the rear or side entrances of abutting properties. As such, they were not included in the traffic analysis as a viable means for moving traffic. As part of the proposed Project, a portion of the Alley 247 and the entire length of Alley 246 between Pioneer Drive and Doran Street is proposed to be vacated. A new north/south alley will be reestablished at the truncated, westerly termination of Alley 247 that will extend north to Pioneer Drive. As a result, Alley 247 will maintain a connection to Pioneer Drive that will continue to provide access to garages of existing residential units that front both Pioneer Drive and Doran Street, which is the intended use of the alley. Alley 246 is proposed to be removed; however, a pedestrian paseo will be created along the westerly boundary of Site A that would extend from Doran Street north to the south reestablished north/south alley connecting to Alley 247 and to Pioneer Drive, thus enhancing pedestrian travel in the downtown area. The adjacent property owners own the underlying fee title to the alley. If and when the alleys are vacated, the land would revert back to the adjacent property owners. The traffic impact analysis conducted for the proposed Project assumes there is no alley for analysis purposes, and the potential traffic impacts of the proposed Project on intersections were considered to be less than significant. Please refer to Response 1, given previously.

Response 3

The project known as the Nexus is included as a cumulative project and identified in **Table 4.0-1, List of Related Projects**. The impact the Nexus project and other cumulative projects in combination with the Project is assessed within **Section 4.0, Environmental Impact Analysis** of the Draft EIR. Cumulative population increase impacts are addressed on pages 4.9-9 through 4.9-10, which include both the Nexus project and the North Central Apartment Project. Overall population increases were considered to be less than significant. Cumulative traffic impacts are addressed on pages 4.1-24 through 4.1-25, which includes both the Nexus project and the North Central Apartment Project. Overall traffic increases were considered to be less than significant.

The conceptual graphic illustrated in the Draft EIR was prepared in May 2013 as part to the Stage I Design Submittal package to the City of Glendale. The actual building on the Nexus site was demolished in late June, just prior to the release of the Draft EIR. The Stage II Design Submittal, which will be presented to the City Council, includes the elimination of the building. Regardless, the depiction of the building in the Draft EIR has no bearing on the impact analysis and does not change any of the conclusions of the EIR.

Response 4

Please refer to Response 1, given previously. As shown in **Table 4.10-7, Existing Plus Project Level of Service**, the proposed Project is not projected to contribute a significant impact to the Central Avenue at Pioneer Drive intersection for future traffic conditions. The level of service (LOS) is B at the Central Avenue and Pioneer Street intersection during both the peak AM and PM hours under existing conditions and would be LOS B under existing plus project conditions. LOS B generally occurs with good progression and/or short cycle lengths (refer to **Table 4.10-1, Level of Service Definitions for Signalized Intersections**).

Response 5

As shown in **Table 4.10-7, Existing Plus Project Level of Service**, the proposed Project is not projected to contribute a significant impact to the Central Avenue at SR-134 Freeway EB Ramp/Sanchez Drive intersection for future existing plus project traffic conditions. The LOS is C at the Central Avenue at SR-134 Freeway EB Ramp/Sanchez Drive intersection during the peak AM hours, and LOS B during the peak PM hours under existing conditions. The LOS during both the peak AM and PM hours would remain unchanged under existing plus project conditions, and impacts were considered to be less than significant.

Response 6

As indicated in **Table 4.10-4, Project Trip Generation** of the EIR, a trip generation comparison of the existing land uses versus the proposed land use has been conducted for the Project site. The existing land uses currently consist of 20 apartment dwelling units, 59,611 square feet of medical/dental office buildings on Site A, and 30,582 square feet of medical/dental office buildings on Site B. The proposed Project is projected to generate approximately 20 less daily vehicle net trips, 30 less evening peak hour trips, and 33 more morning peak hour trips over the existing on-site uses. As shown in **Table 4.10-7, Existing Plus Project Level of Service**, the proposed development is not projected to contribute a significant impact to any of the analyzed intersections for future traffic conditions.

Air quality and noise construction pollution impacts are addressed in the EIR. As indicated in **Section 4.2, Air Quality and Greenhouse Gases** on page 4.2-38, project construction emissions for NOX would exceed SCAQMD's significance threshold in 2014 primarily due to demolition activities. In addition, Project-related construction emissions for ROG would exceed SCAQMD's significance threshold in 2015 and 2016 primarily due to painting and asphalt paving. For these reasons, construction air quality emissions were considered to be significant.

Noise standards for specific land uses are identified in the City of Glendale’s Noise Ordinance, which is located in Chapter 8.36, Section 8.36.040 of the Municipal Code. Under Section 8.36.040 of the Noise Ordinance, exterior and interior noise is regulated by reference to “presumed noise standards,” which are presented in **Table 3.0-2, Exterior Presumed Noise Standards**, which follows.

Table 3.0-2
Exterior Presumed Noise Standards

Zone	Standard	Maximum	Time
Residential (multifamily, hotels, motels, and transient lodgings)	60 dBA	65 dBA	Anytime
Central Business District and Commercial	65 dBA	70 dBA	Anytime

Source: City of Glendale Municipal Code

Where noise levels are below the presumed noise standards, the actual ambient noise level controls and any noise more than 5 dBA above the actual ambient noise level is considered a violation of the Noise Ordinance. Where the actual ambient noise level exceeds the presumed noise standard, the actual ambient noise level also controls, and any noise more than 5 dBA above the actual ambient noise level is also considered a violation of the Noise Ordinance. As indicated in **Section 4.6, Noise**, on page 4.6-19, potential construction-related noise impacts are considered significant due to exceeding the noise threshold of 65 dBA for residential and 70 dBA for commercial areas, as allowed by the Municipal Code.

Aesthetic impacts, including massing and architectural design, are addressed in the EIR in **Section 4.1, Aesthetics**. Although the proposed buildings will be taller than the existing buildings currently located at the site, the architectural design will result in the massing of the buildings being visually compatible. Given the existing urban aesthetic context and objectives of the DSP, development of the Project would not substantially degrade the existing visual character or quality of the Project site and its surroundings, and no significant impact to the visual character of the site and the surrounding area would result.

Please refer to Response 2, given previously, regarding the alley across the Project site.



PARK TOWERS

345 North Pioneer Drive
Glendale, Ca. 91203
818 548-1534

ParkTowersGlendale@sbcglobal.net

September 24, 2013

Mr. Erik Krause, Principal Planner
City of Glendale
633 East Broadway, Room 103
Glendale, California 91206

RE: North Central Avenue, Apartments Project, Site A

Dear Mr. Krause:

Let me re-introduce myself. My name is Victor Maling, and I am the Secretary of The Park Towers Home Owners Association located at 343/345 Pioneer Drive, Glendale, California 91203.

The HOA Board and concerned owners of Park Towers wish to bring the following items to your continued attention:

Please reference our letter to you of May 20, 2013, in which we detailed the potential car traffic on Pioneer Drive between North Central Avenue to North Pacific Avenue, and that of West Doran Street with the same boundaries from East to West.

1

We feel most concerned that the Environmental Impact Statement has not properly addressed the issue of having the adjoining street, West Doran within its parameters from North Central Avenue to North Pacific Avenue.

2

The point in question being: The existing inequity of car traffic based on parking spaces on Pioneer Drive (1,959) vs. West Doran (829). The proposed Site A building parking spaces of 456 divided by two would add 228 cars to Pioneer which would increase the inequity on Pioneer Drive to 2,187 vs. West Doran remaining at 829.

In the Appendices, Apx 4.10 Traffic Study, Section IV, A. Surrounding Street System:

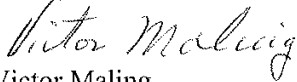
It states Doran Street having four lanes divided. This is only true for Doran Street between North Central Avenue and Brand Boulevard, while Doran Street between North Central Avenue and North Pacific Avenue is only two lanes undivided. I suspect this area was never in the Traffic Study.

3

Therefore, please have the Traffic Study amended for the above Doran Street area and seriously consider having the developer flip the footprint of Site A allowing an exit on both Central and Doran.

Thank you for your consideration of this input. Should you have any questions, please call me at (818) 545-0966 or contact our General Manager, Mr. Barry James at (818) 548-1534.

Very truly yours,



Victor Maling
Secretary, Board of Directors
Park Towers Home Owners Association

Cc: Association Office

1 Enclosure



PARK TOWERS

345 North Pioneer Drive
Glendale, Ca. 91203
818 548-1534

ParkTowersGlendale@sbcglobal.net

May 20, 2013

Mr. Erik Krause, Principal Planner
City of Glendale
633 East Broadway, Room 103
Glendale, California 91206

RE: North Central Avenue, Apartments Project, Site A

Dear Mr. Krause:

My name is Victor Maling, and I am the Secretary of Park Towers Homeowners Association located at 343-345 Pioneer Drive, Glendale, California 91203.

The Board and concerned owners of Park Towers wish to bring the following items to your attention:

1. Site A, along with Site B and proposed future five story residential site North of Site B will add further traffic congestion to the area already saturated with congested.
2. Pioneer Drive and the North Columbus Avenue cul-de-sac from North Central Avenue to North Pacific Avenue currently has 1,959 parking spaces. This represents 70.3% of the total of 2,788 parking spaces on both Pacific and Doran Streets from North Central Avenue to North Pacific Avenue.
3. West Doran Street from North Central Avenue to North Pacific Avenue has 829 parking spaces and represents 29.7% of the total for both streets.
4. The proposed Site A parking spaces of 456 with an assumed division by two (228 for the North end of Site A at Pioneer and 228 for the East side of Site A at Central) will give a revised total for Pioneer of 2,187 parking spaces or 72.5% and 27.5% for Doran for a revised total of 3,010 parking spaces.
5. Our recommendation is for the developer to flip the footprint of Site A allowing an exit on both Central and Doran giving Doran a revised 1,057 parking spaces or 35% of the total and Pioneer at 65% of the existing 1,959 spaces.
6. The above recommendation would result in a more equitable distribution of traffic for the area. The developer would only have to relocate his connections to city services. The addition of a three-way intersection traffic light would be helpful at Doran and Central.

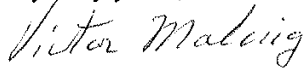
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7. Please note that parking spaces were tallied by www.Prudentialcal.com by visually counting parking spaces, air conditioning units, and numbers of stories per building. Each apartment or house unit was assumed to have to have two parking spaces.

11

Thank you for your consideration of this input. Should you have any questions, please call me at (818) 545-0966 or contact our general manager, Mr. Barry James at (818) 548-1534.

Very truly yours,



Victor Maling
Secretary, Board of Directors
Park Towers Homeowners Association

Attachments: (2)

Cc: General Manager
Board Members
File

6. Letter from Park Towers, Victor Maling, dated September 24, 2013

Response 1

Please refer to Response 5 through 11, which follow, where your comments are addressed. These comments from the May 20th letter were received in response to the NOP and were included in the Draft EIR.

Response 2

It is not clear what the comment is conveying by stating the inequity of cars based on parking. The proposed Project would provide on-site parking for the new uses in compliance with the Glendale Municipal Code (GMC). This would provide on-site parking for both residents and guests. The Project is not proposing to remove any on-street parking or to add any on-site parking. New on-street parking spaces may become available due to the closure of existing driveway aprons on Doran and Pioneer; however, the number of spaces would not be significant.

As indicated in **Table 4.10-4, Project Trip Generation** of the EIR, a trip generation comparison of the existing land uses versus the proposed land use has been conducted for the Project site. The existing land uses currently consist of 20 apartment dwelling units, 59,611 square feet of medical/dental office buildings on Site A, and 30,582 square feet of medical/dental office buildings on Site B. The proposed Project is projected to generate approximately 20 less daily vehicle net trips, 30 less evening peak hour trips, and 33 more morning peak hour trips over the existing on-site uses. As indicated in **Table 4.10-7, Existing Plus Project Level of Service**, the proposed development is not projected to contribute a significant impact to any of the analyzed intersections for future traffic conditions, including the Pioneer Drive and Central Avenue intersection.

Response 3

Please refer to **Figure 4.10-3, Project Inbound Trip Distribution** and **Figure 4.10-4, Project Outbound Distribution**. The segment of Doran Street referenced (N. Central Avenue to N. Pacific Avenue) would not experience any substantial traffic increases given the location of access point of the proposed Project along Pioneer Drive and Central Avenue, and the anticipated distribution of project traffic. In addition, the area intersections included within the traffic study were based on discussions with the City of Glendale Traffic and Transportation Division staff. The Congestion Management Program Traffic Impact Assessment guidelines require that intersections be examined if the proposed project will add 50 or more trips during either the morning or evening weekday periods. The proposed Project is not projected to add 50 or more trips onto Doran Street west of Central Avenue during either the morning

or evening weekday periods. Consequently, the intersections along this segment of Doran were not examined in the EIR.

Response 4

The comment suggests that the EIR evaluate an alternative to the proposed Project. Section 15126.6 of the *CEQA Guidelines* 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 effects of the project, and evaluate the comparative merits of the alternatives." As discussed previously, the proposed Project does not reduce parking or result in significant traffic impacts. For these reasons, the examination of an alternative that includes flipping the site plan would not avoid or substantially lessen significant traffic or parking impacts of the Project. For these reason, the City has not considered the Park Towers alternative to augment the site plan. Further, the examination of such a site plan would not avoid or substantially lessen any of the significant impacts associated with the Project such as short-term construction equipment emission impact; short-term construction equipment noise and ground-borne vibration impacts during construction; long-term exterior noise along North Central Avenue; long-term recreation impacts; and cumulative fire, police, recreation, and solid waste disposal impacts.

Please also refer to responses 2 and 3; the proposed Project not does reduce parking or result in significant traffic impacts.

Response 5

In the City of Glendale, the impact is considered significant for signalized intersections if the project-related increase in the volume to capacity (V/C) ratio equals or exceeds 0.02 for intersections that have LOS D or worse. The impact is considered significant for unsignalized intersections if the project-related increase in the delay equals or exceeds 3 seconds for intersections that have LOS D, E, or F. As shown in **Table 4.10-7, Existing Plus Project Level of Service**, the proposed development is not projected to contribute a significant impact to any of the analyzed intersections for future traffic conditions.

Response 6

Please refer to responses 2 and 3; the proposed Project does not reduce parking or result in significant traffic impacts.

Response 7

Please refer to responses 2 and 3; the proposed Project does not reduce parking or result in significant traffic impacts.

Response 8

Please refer to responses 2 and 3; the proposed Project does reduce parking or result in significant traffic impacts.

Response 9

Please refer to responses 2, 3, and 4; the proposed Project does not reduce parking or result in significant traffic impacts.

Response 10

Please refer to responses 2 and 3; the proposed Project does not reduce parking or result in significant traffic impacts.

Response 11

Please refer to responses 2 and 3; the proposed Project does not reduce parking or result in significant traffic impacts.

The comment is noted where the Park Towers obtain parking space information. Usually utilizing Google maps and counting the number of spaces, air conditioning units, and the number of stories is not a means to determine the number of on-street parking spaces. The number of parking spaces provided on each project site was contained within the NOP that was released for the proposed Project, so an assumption to the number of spaces is not needed.



Erik Krause
City of Glendale
818 548 2140
633 E. Broadway
Glendale, CA 91206

Re: **North Central Avenue Apartments Project**

(State Clearing House No: 2013051031)

Dear Mr. Krause,

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 **North Central Avenue Apartments Project**, 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; a five-story apartment building with 315 residential units and 456 associated parking spaces and a five-story apartment building with 192 units and 275 associated parking spaces 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:

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|-----|---|----|
| 1. | <u>Make reference to any urban water management plan;</u> | 2 |
| 2. | <u>Document wholesale water supplies;</u> | 3 |
| 3. | <u>Document Project demand;</u> | 4 |
| 4. | <u>Determine reasonably foreseeable development scenarios, both near-term and long-term;</u> | 5 |
| 5. | Determine the water demands necessary to serve both near-term and long-term development and project build-out (which would have to examine likely development within the totality of the EBMUD service area); | 6 |
| 6. | Identify likely near-term and long-term water supply sources and, if necessary, alternative sources; | 7 |
| 7. | Identify the likely yields of future water from the identified sources; | 8 |
| 8. | Determine cumulative demands on the water supply system; | 9 |
| 9. | Compare both near-term and long-term demand to near-term and long-term supply options, to determine water supply sufficiency; | 10 |
| 10. | Identify the environmental impacts of developing future sources of water; and | 11 |
| 11. | Identify mitigation measures for any significant environmental impacts of developing future water supplies. | 12 |
| 12. | Discuss the effect of global warming on water supplies. | 13 |

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.	14
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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.

15

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.

16

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 shrift that it does, the EIR needs to include a comprehensive discussion of possible impacts of the emissions from this project.

17

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

18

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.

19

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 Development upon those same surrounding properties and the land uses which may or have occurred thereon.

20

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

7. Letter from Citizens Advocating Rational Development, Nick Green, Undated

Response 1

Contrary to the first statement in this comment, the proposed Project includes a variety of energy conservation features. Title 24 of the California Code of Regulations, identifies Building Energy Efficiency Standards applicable to all new construction. These standards regulate energy consumed in buildings for heating, cooling, ventilation, water heating, and lighting. Title 24 is implemented through the local plan check and permit process in the City of Glendale.

In addition, per Ordinances 5714 and 5736, the City of Glendale adopted the 2010 California Green Building Standards Code (CALGreen) as Volume IX of the Glendale and Safety Code 2011. These ordinances require the energy efficiency of the proposed project to be 15 percent above the Title 24 requirements. Some items included in the Ordinance that would be required to be incorporated into the proposed Project to reduce energy consumption include the following:

- The installation of radiant roof barriers
- The requirement that all gas-fired space heating equipment have an annual fuel utilization ratio of .90 or higher
- The requirement that all cooling equipment have a seasonal energy efficiency ratio (SEER) higher than 13.0 and an energy efficiency rating (EER) of at least 11.5
- The requirement that all gas-fired water heaters have an energy factor of .60 or higher
- The provision of roof space to allow for the future installation of future solar panel or photovoltaic panels
- The provision of electrical conduits for future access to solar systems
- The provision of natural light and ventilation

Response 2

The applicable urban water management plan, *2010 Urban Water Management Plan* (Glendale Water and Power [GWP], adopted June 2011), is discussed in detail in **Section, 4.11.1 Water Service**. Pages 4.11.1-1 through 4.11.1-28 include a description and contents of the plan, along with detailed information about the water provider (GWP); projected near-term, long-term, and cumulative water citywide demand; the sources of water available to the proposed Project; and the availability and adequacy of water supplies to meet the projected water demand.

Response 3

Please refer to response 2, given previously. Also, please note that on page 4.11.1-3 of the EIR, it is reported that for the 5 fiscal years ended June 30, 2010, Glendale received an average of approximately 21,090 acre feet per year (AFY) of water from the Metropolitan Water District (MWD), which constituted approximately 66 percent of Glendale's total water supply. The continued availability and reliability of this supply from MWD is addressed in the City's Urban Water Management Plan (UWMP) and reflected in the 20-year water supply projections in the UWMP. MWD supplies are delivered to Glendale through three service connections with capacities of 48, 10, and 20 cubic feet per second (cfs), respectively.³

Response 4

Please refer to response 2, given previously. Also, please note that on pages 4.11.1-24 and 4.11.1-25 of the EIR, it is indicated that the Project site would result in an increase in demand for operational uses, including landscape irrigation, maintenance, and other activities on the site. Water demand at build out for Site A would be approximately 34.95 AFY and water demand at build out for Site B would be approximately 26.4 AFY.

Response 5

Please refer to response 2, given previously. Also, please note that on page 4.11.1-25, water demand projections were generated for the entire GWP service area for the years 2015, 2020, 2025, 2030, and 2035, based on population projections and water demand rates in the City's UWMP. GWP has sufficient sources of water to meet projected needs through the year 2035 during normal, dry, and multiple dry years.

Response 6

Please refer to responses 2 and 5, given previously. Also, please note that the East Bay Municipal Utility District (EBMUD), which is located in Oakland, California, has no relevance to the proposed Project. The proposed Project is located in Los Angeles County and is served by Glendale Water and Power.

Response 7

Please refer to response 2, given previously. Also, please note that on pages 4.11.1-1 through 4.11.1-4, the City's water supply comes from three sources, including groundwater, water imported from the

3 City of Glendale Water & Power, 2010 UWMP, 27.

MWD, and recycled water. During dry conditions, water supplies from the San Fernando and Verdugo basins and recycled water would remain unaffected. In addition, there is an MWD storage/banking system in place to ensure a reliable supply of MWD water during dry years.

Response 8

Please refer to responses 2, 5, and 7, given previously.

Response 9

Please refer to response 2, given previously. Also please note that on pages 4.11.1-27 and 4.11.1-28 of the Draft EIR, the development of related cumulative projects would result in a water demand of approximately 680 AFY. Combined with the net increase of 61.35 AFY generated by the Project, the cumulative amount demanded by the Project and related cumulative projects would generate an overall future water demand of approximately 741.35 AFY. This amount is within the projected 29,323 AFY increase in water demand projected by year 2035 in the City's UWMP. Therefore, the cumulative impact of the Project and related projects to water supply is less than significant, and the Project's contribution to this impact would not be cumulatively considerable.

Response 10

Please refer to responses 2, 5, and 7, given previously.

Response 11

Please refer to response 2, given previously. The proposed Project would be supplied by existing water sources and would not require the development of future water sources. Consequently, no additional sources of water are needed to serve the proposed Project, and no impact analysis for additional water sources was conducted.

Response 12

Please refer to responses 2, and 11, given previously.

Response 13

The potential effects of global warming are discussed in **Section 4.2, Air Quality and Greenhouse Gases** of the Draft EIR on pages 4.2-6 and 4.2-7. As noted, global warming on water supplies in California may include a reduction in the quality and supply of water in the State from the Sierra snowpack.

Response 14

As discussed previously in the responses to comments 2 through 13, the Draft EIR provides sufficient information on the adequacy of the City's water supplies in relation to the increase in demand from this Project. The City has sufficient water supplies to serve the Project and no significant impacts will result from the approval of the Project.

Response 15

The effect of global warming, greenhouse gas (GHG) inventory, and legislative and regulatory activities are discussed in **Section 4.2 Air Quality and Greenhouse Gases** of the Draft EIR on pages 4.2-6 through 4.2-8 and pages 4.2-19 through 4.2-27.

Response 16

The City of Glendale is unclear what "Guidelines" this comment is referring to as related to the climate change and GHG analysis contained in **Section 4.2, Air Quality and Greenhouse Gases** of the Draft EIR. The regulatory environment and guidance from various federal and state agencies are provided in detail on pages 4.2-18 through 4.2-27, and the specific thresholds and methodologies used in the analysis and the rationale for using them are described in detail on pages 4.2-34 and 4.2-35. Contrary to the claim in the comment, the Draft EIR does not simply reference the work of others, but undertakes a thorough quantitative analysis of the proposed Project based on established methodologies and guidance by appropriate regulatory agencies such as the South Coast Air Quality Management District (SCAQMD). The SCAQMD is the agency responsible for ensuring that all state and federal ambient air quality standards are achieved and maintained in the air basin. The analysis of GHGs is provided on pages 4.2-46 through 4.2-48. It should be noted that the SCAQMD reviewed the Draft EIR and made no comments on the GHG analysis. **Appendix 4.2** of the Draft EIR contains the supporting CalEEMod calculations and assumptions used in the GHG analysis.

Response 17

Contrary to the statement in the comment, the EIR does not give "short shrift" to the topic of climate change, but in fact includes a thorough discussion of the potential effects of climate change (pages 4.8-6 through 4.2-8). Topics addressed include the potential increased risk of large wildfires, the rise in sea levels, a reduction in the quality and quantity of certain agricultural products, and the exacerbation of air quality problems, along with other potential effects.

Section 4.2, Air Quality and Greenhouse Gases of the Draft EIR in total includes 50 pages of discussion of applicable regulations, a quantification of air quality and GHG emissions, an analysis, and findings. Specific to GHGs, the Draft EIR include over 15 pages just related to this topic. **Appendix 4.2** also

includes 15 pages of supporting calculations and CalEEMod model runs. Although the emissions are clearly identified and the resulting effects of global GHG emissions are discussed on pages 4.2-6 through and 4.2-8, the incremental effect of the Project's emissions on macrolevel processes such as rainfall and snow pack dynamics cannot be quantified. Attempting to draw a direct link between the Project's GHG emissions and changes in climate such as affecting rainfall and snow pack would be speculative at best. CEQA does not require an EIR to conduct speculative analysis of issues.

Response 18

The comment is not clear and provides no supporting data, references, or sources to explain what specific problems are of concern, or why the analysis provided in the EIR is inadequate. Further, the comment does explain what would constitute adequacy. The EIR discusses numerous effects of climate change on the environment and discusses the potential increased risk of large wildfires, the rise in sea levels, a reduction in the quality and quantity of certain agricultural products, and the exacerbation of air quality problems, along with other potential effects. Carbon dioxide, which is the primary source of GHGs, is identified in the EIR (Table 4.2-5, page 4.2-10) as a cause of increased occurrence of cardiovascular and respiratory diseases and other chronic conditions. Air quality impacts are thoroughly analyzed in **Section 4.2** of the EIR, and air quality impacts from the occupancy and use of the Project were determined to be less than significant or mitigated to less than significant.

Response 19

The EIR includes an analysis of potential cumulative impacts for all environmental topics addressed in the EIR, including water supply (pages 4.11.1-27 through 4.11.1-28), air quality (page 4.2-48), and climate change (pages 4.2-49 through 4.2-50).

Response 20

This comment states that the alternative analysis fails to provide a discussion of the effect of the Project or the absence of the Project (i.e., no project). The purpose of the alternative section and analysis is not to provide an assessment of the impacts of the proposed Project, but instead to provide a comparative analysis of the impacts of a reasonable range of alternatives to a project. The impacts of the proposed Project are assessed in detail in **Section 4.0, Environmental Impact Analysis**, of the EIR. These impacts are summarized in **Section 5.0, Alternatives**. Project impacts identified as significant in the EIR include short-term construction equipment emission impacts; short-term construction equipment noise and ground-borne vibration impacts during construction; long-term exterior noise along North Central Avenue; long-term recreation impacts; and cumulative fire, police, recreation, and solid waste disposal impacts.

The EIR examines the No Project/No Development Alternative. The No Project/No Development Alternative is required to be evaluated by Section 15126(6)(e) of the *CEQA Guidelines*. As required by the *CEQA Guidelines*, the analysis must examine the impacts that 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 Project site would not be developed with additional uses, and would remain in its current state. The existing office buildings, 20-unit multifamily complex, above-ground utility lines, and associated surface 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 construction equipment emission impacts; short-term construction equipment noise and ground-borne vibration impacts during construction; long-term exterior noise along North Central Avenue; long-term recreation impacts; or cumulative fire, police, recreation, and solid waste disposal impacts would occur as a result of this alternative. This alternative was identified as environmentally superior to the Project for these reasons, but was also determined to be infeasible because it would not meet the Project objectives.



September 25, 2013

Erik Krause, Senior Planner
City of Glendale Community Services Department
633 E. Broadway, Room 103
Glendale, CA 91206

RE: North Central Avenue Apartments Project

Dear Mr. Krause:

On behalf of the Board of Directors and the Preservation Advocacy Committee 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 North Central Avenue Apartments Project. Established in 1979, TGHS is a non-profit organization with more than 500 individual members dedicated to the preservation of Glendale’s rich history and remaining architectural heritage through advocacy and education.

1

TGHS is concerned that the proposed project would result in the demolition of three mid-20th century medical buildings located 540, 607, and 633 North Central Avenue. We disagree with the conclusions in the historic resources section of the DEIR (4.3 Cultural Resources) and, instead, concur with the findings of the 2006 City-adopted Historical Resources Technical Report prepared for the Glendale Downtown Specific Plan (DSP) that this unique grouping of post-World War II medical office buildings by Gill Causey and Frank Rhodes are “outstanding examples of a well articulated modernist vernacular” that “represent[s] the growth and development of the medical industry in Glendale in the 1950s and 1960s.” As such, TGHS believes that these buildings are individually eligible for designation on the Glendale Register of Historic Resources and as contributors to a potential historic district.

2

Accordingly, TGHS requests that a preservation alternative that retains and incorporates all three buildings (540, 607 and 633 North Central Avenue) into the proposed development be identified and evaluated.

3

Again, thank you for the opportunity to comment on the DEIR for the North Central Avenue Apartments Project. Please feel free to contact me at greg.grammer@glendalehistorical.org or at 818-242-7447 should you have any questions.

Sincerely,

Greg Grammer, President
The Glendale Historical Society

cc: Jay Platt, Senior Urban Designer

8. Letter from The Glendale Historical Society, Greg Grammer, September 25, 2013

Response 1

The comment is an introductory paragraph thanking the City for providing The Glendale Historical Society (TGHS) the opportunity to comment on the Draft EIR and describes TGHS.

Response 2

The intent, purpose, and limitations of the reconnaissance-level historic resources survey conducted for the Program EIR for the Glendale Downtown Specific Plan should be recognized to understand the findings of this preliminary analysis in relation to the detailed site-specific analysis provided in this Draft EIR. As stated in the Final Program EIR:

The purpose of the reconnaissance-level survey conducted for this project is to identify potential historic properties that currently exist within the Downtown Specific Plan (DSP) area.

A reconnaissance-level (or windshield) historical resource survey of all the properties within the DSP area was undertaken in January 2006. The survey was conducted according to established professional standards and practices, as prescribed in National Register Bulletin 24—Guidelines for Local Surveys: A Basis for Preservation Planning and the Secretary of the Interior’s Standard and Guidelines for Identification (48 FR 44720-23) and “Recording Historical Resources,” prepared by the State Office of Historic Preservation dated March 1995. In National Register Bulletin 24, the National Park Service characterizes a reconnaissance-level survey as “a ‘once over lightly’ inspection of an area, most useful for characterizing its resources in general and for developing a basis for deciding how to organize and orient more detailed survey efforts.” The survey methodology involved three principle elements: (1) Preparation of a historic context focused on the history and development of Downtown Glendale; (2) Compiling a preliminary list of previously evaluated historical resources in the project area; and (3) Conducting a reconnaissance-level field survey of all properties within the project area. Because of the limited research inherent in a reconnaissance level survey, the present effort distinguishes between “known historical resources” (or resources that have been formally identified by an authoritative agency) and “potential historical properties” that appear to meet the designation criteria of the National Register of Historic Places (NRHP), California Register of Historic Resources (CRHR), or Glendale Register of Historic Resources (GRHR), but require an intensive-level survey investigation before a formal evaluation can be made.

Because the Glendale DSP EIR is intended to be a programmatic document that defines issues and sets forth development policy in broad terms rather than on a project or site-specific basis, it reserves site-specific analysis for future environmental analysis conducted for individual development proposals.

The Final Program EIR included this mitigation measure to specifically require the detailed site-specific analysis in this EIR:

MM 4.4-4(d) In the event that a future development project within the Downtown Specific Plan Area is proposed on a site containing a potential historic property, the City shall require, as part of the environmental review of the project, an intensive level survey to determine whether the property is a historic resource under CEQA. If the intensive level survey determines that the potential historic property is a historic resource, the City shall undertake the analysis and impose mitigation measures required under MM 4.4-4(a) through (c).

The individual buildings at 540, 607, and 633 North Central Avenue were identified as “a group of four [including 610 N. Central] similarly designed medical buildings, constructed between 1953 and 1963” in the reconnaissance level survey, *Historical Resources Technical Report, 2006* prepared for the Glendale Downtown Specific Plan Program Environmental Impact Report. They were identified in the report as potentially historic “because they are a unique grouping of postwar medical office buildings that embody distinctive characteristics of their architectural type and period of construction in Glendale.”

As required by Mitigation Measure 4.4-4(d) in the Final Program EIR, an intensive-level, site-specific survey was conducted by Kaplan Chen Kaplan in 2013 as part of this EIR. This historic resources evaluation is provided in **Appendix 4.3** to the Draft EIR, and information from this evaluation is incorporated into **Section 4.3, Cultural Resources** in the Draft EIR and is summarized in the Draft EIR. An intensive field review of the buildings and their settings was conducted along with intensive research, including research on the history of the neighborhood, the buildings, the developers, owners, and tenants.

Please note that the *Glendale Historic Preservation Element* does not contain a historic context or define mid-century medical office buildings as a historic building type. The area in which these buildings are located had been used for medical offices predating construction of the subject buildings. No information was identified supporting a historic context for mid-century medical office buildings.

The research completed also did not identify any information suggesting that the subject buildings were a catalyst for development of additional medical office buildings in this portion of Glendale. The subject

buildings do not exhibit significant architectural design features. Each is a basic brick office building that does not possess outstanding or exemplary elements or attention to design, detail, materials, or craftsmanship. The architect/engineer for these buildings, Bernard Cardan, is not considered a master architect or designer. The developers of the buildings were successful local businessmen in Glendale, but that fact does not impart historic significance to these buildings.

These buildings do not relate to each other in terms of landscape design or setting, and these buildings were not developed in accordance with any known master plan. Each building is oriented to the nearest street intersection and sited with one side on each street frontage. The areas between the buildings consist of surface parking lots without any common design or landscape elements. There are no urban design elements employed to relate the open space (used for parking) to the buildings.

The intensive level evaluation of these buildings did not identify information supporting a conclusion that these buildings at 540, 607, and 633 North Central Avenue meet the criteria for designation as an historic resource at the local, state, or national levels.

Response 3

Section 15126.6 of the *CEQA Guidelines* 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 effects of the project, and evaluate the comparative merits of the alternatives. 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.

As discussed in the Draft EIR, although the Project site contains some older structures, these buildings are not notable for their architectural design and none are considered to be historic resources. For these reasons, the examination of an alternative that incorporates the existing buildings on the site into the Project was not required in the EIR because the Project will not result in any significant impact on historic resources. The examination of such an alternative would not avoid or substantially lessen many of the significant impacts identified for the Project such as long-term exterior noise along North Central Avenue; long-term recreation impacts; and cumulative fire, police, recreation, and solid waste disposal impacts.

4.0 REVISIONS TO THE DRAFT EIR

In accordance with the CEQA Guidelines § 15132 (a), this section of the Final EIR provides changes to the Draft EIR that have been made to clarify, correct or supplement the environmental impact analysis for the Project. Such changes are a result of recognition of inadvertent errors or omissions as well as individuals, public and agency comments received in response to the Draft EIR. The changes described in this section do not result in any new or increased significant environmental impacts that would result from the Project.

Provided below are corrections and additions to the Draft EIR, including where appropriate, the associated technical appendices. Changes are identified below by the corresponding Draft EIR section and subsection, if applicable, and the page number. Additions are underlined and deletions are shown in strikethrough (~~strikethrough~~) format.

Section 3.0 Project Description

The following revision has been made to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
3.0-12	At Site A, multiple passageways are provided to the three designated courtyards and lawn terraces which provide <u>32,603</u> 37,865 square feet of open space and recreational areas. Site A also includes a recreational building on the ground floor and a <u>11,000</u> 10,000 square-foot roof deck. In total, Site A includes <u>66,687</u> 66,207 square feet of recreational and open space throughout the property.

The following revision has been made to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
3.0-13	Site B also includes a <u>8,786</u> 9,200 square-foot roof deck. In total, Site B includes <u>36,239</u> 36,049 square feet of recreational and open space throughout the property.

Section 4.2 Air Quality and GHG

The following addition has been made in response to the South Coast Air Quality Management District Comment Letter to include additional mitigation to reduce NOx emissions.

<u>Page</u>	<u>Revision</u>
4.2-39	<p>4.2-3 <u>Project start to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.</u></p> <p>4.2-4 <u>Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.</u></p> <p><u>A copy of each shall be provided at the time of mobilization of each applicable unit of equipment.</u></p>

The following revision has been made in response to the South Coast Air Quality Management District Comment Letter.

<u>Page</u>	<u>Revision</u>
4.2-44	<p>The health risk assessment (HRA) prepared for the Project indicated that for carcinogenic exposures, the summation of risk for the maximum exposed residential receptor totaled <u>1.1</u> 1.5 in one hundred thousand for the 30-year exposure and <u>3.4</u> 4.6 in one million for the 9-year exposure scenarios</p>

The following revision has been made to make mitigation numbering consistent.

<u>Page</u>	<u>Revision</u>
4.2-44	<p>4.2-53 The apartment developer shall limit particulate infiltration to on-site residents by installing and maintaining air filtration systems with efficiencies equal to or exceeding a Minimum Efficiency Reporting Value (MERV) 13 as defined by the</p>

American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2.

The following revision has been made to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
4.2-44	In large part, the SCAQMD 2012 2007 AQMP was prepared to accommodate growth, to meet state and federal air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy.

Section 4.5 Land Use and Planning

The following revision has been made to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
4.5-20	Site A also includes a recreational building on the ground floor and a 11,000 10,000 square foot roof deck. In total, Site A includes 66,687 66,207 square feet of recreational and open space throughout the property. Site B also includes a 8,786 9,200 square foot roof deck. In total, Site B includes 36,239 36,049 square feet of recreational and open space throughout the property.

Section 4.6 Noise

The following revision has been made to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
4.6-14	Due to the high level of traffic noise along Central Avenue and SR- 134126 , normal daytime parking structure L_{eq} noise would not likely be audible due to the masking of noise by these sources.

Section 4.7.1 Fire Protection & Emergency Medical Services

The following revision has been made to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
4.7.1-1	The ratio of fire personnel to residents in the City presently stands at 1 to 803 807 residents.

The following revision has been made to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
4.7.1-5	The present fire personnel-to-resident ratio is one to 803 807. The Project would increase the City’s population to 193,973 residents which would result in an overall ratio of one fire personnel to approximately 807 808 residents.

Section 4.7.2 Police Protection

The following revision has been made to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
4.7.2-1	The officer-to-population ratio in the City was approximately 1.324 sworn officers per 1,000 residents in 2012.

The following revision has been made to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
4.7.2-4	The 2012 officer-to-population ratio within the City was 1.324 sworn officers per 1,000 residents. Based upon a target officer-to-population ratio, Project residents would result in a need for 1.3 1.76 new sworn officers. The Project would increase the City’s population to 193,973 residents which would result in an overall ratio of 1.321 sworn officers per 1,000 residents.

Section 4.7.3 Schools

The following revision has made been to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
4.7.3-4	As discussed in Section 4.9, Population and Housing , the Project and related projects would result in the addition of 3,143 2,636 residential units in the City of Glendale.

**Table 4.7.3-2
Student Generation Table (Cumulative)**

Grade Levels	Generation Rates (Students per Unit)	Proposed Residential Units	Total
K-6	0.304	3,143 2,636	955

Grade Levels	Generation Rates (Students per Unit)	Proposed Residential Units	Total
7-8	0.107	3,1432,636	336
9-12	0.225	3,1432,636	707
		Total Students	1,998

Source: Glendale Unified School District, *Impact of Residential Development on the Need for Additional School Facilities*, February 2012, page 10.

Note: The generated student numbers were rounded if calculation resulted in decimal numbers.

Section 4.8 Recreation

The following revision has made been to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
4.8-10	At Site A, multiple passageways are provided to the three designated courtyards and lawn terraces which provide 37,865 <u>32,603</u> square feet of open space and recreational areas.

The following revision has made been to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
4.8-10	Site A also includes a recreational building on the ground floor and a 10,000 <u>11,000</u> -square-foot roof deck. In total, Site A includes 66,207 <u>66,687</u> square feet of recreational and open space throughout the property.

The following revision has made been to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
4.8-11	Site B also includes a 9,200 <u>8,786</u> square-foot roof deck. In total, Site B includes 36,049 <u>36,239</u> square feet of recreational and open space throughout the property.

The following revision has made been to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
4.8-12	4.8-1 In accordance with the requirements of the City of Glendale Municipal Code Section 4.10 (Ordinance No. 5575 and Resolution No. 07-164 as amended on

Resolution 10-199, 11-93, 11-123, 12-86, 13-102), the project applicant shall pay the Development Impact Fee to the City. The current fee schedule is \$7,000 per residential unit which is scheduled to increase to \$10,500 per unit in December 2014. Developer agrees to pay 100% of the Parks and Library Impact Fees within one year from the Effective Date at the rate in effect at the time of payment (\$7,000 per residential unit); provided, however, that Developer acknowledges and agrees that it shall make additional Parks and Library Impact Fees payment(s) for any approved increase in the number of units or on any approved increase in commercial square footage of the Project submitted by Developer after the Fee Payment. Any additional payment for additional units or square footage shall be calculated at the rate in effect at the time of payment. Notwithstanding the foregoing, the Developer acknowledges and agrees that it shall not be eligible for any reduction, rebate or reimbursement in the amount of Fee Payment (i) should Developer choose to reduce the number of units or square footage in the Project; (ii) in the event the plan check submission expires, (iii) the Developer otherwise withdraws from the City's building plan check process, or (iv) the building permit expires and the Project is not completed. At the time of any re-submission of the Project to plan check, or any approved revision to the Project, Developer shall be required to pay the difference between any Parks and Library Impact Fees previously paid and the Parks and Library Impact Fees payable at the rates in effect at such time. The parties acknowledge that Developer's Fee Payment is of substantial benefit to the Developer and the City, and in exchange for, and in consideration of that substantial benefit, the Developer agrees to forego and to forever waive the right to request a refund of, reduction to, or modification of the Fee Payment. If Developer's Fee Payment does not clear, is cancelled by Developer, or is rendered ineffective for any reason, Developer shall then pay the Parks and Library Impact Fees at the rate then in effect as specified in the Development Impact Fee Ordinance No. 5575 and associated Fee Resolution. Developer agrees to make the Fee Payment within one year from the Effective Date at the rate in effect at the time of the Fee Payment. Provided, however, if Developer does not make the Fee Payment within the time period set forth herein, then Developer shall pay the Parks and Library Impact Fees pursuant to Ordinance 5575 or as that Ordinance may be amended by the City at the rates then in effect.

Section 4.9 Population and Housing

The following revision has made been to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
4.9-8	A net increase of 487 residential units creates homes for approximately <u>1,267</u> 1,271 new residents within the DSP.

The following revision has made been to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
4.9-8	The anticipated 52 temporarily displaced individuals would not significantly impact the availability of residential units within the DSP as the Project will create housing for approximately <u>1,267</u> 1,271 net new additional people within the DSP or the City.

The following revision has made been to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
4.9-10	The additional residential units developed by the Project would lead to a net increase of 487 multifamily residential units with a net increase of housing for approximately <u>1,267</u> 1,271 individuals.

Section 4.10 Traffic and Transportation

The following addition has been made in response to the California Department of Transportation Comment Letter.

<u>Page</u>	<u>Revision</u>
4.10-12	

**Table 4.10-2
Existing Level of Service**

	Intersections	Existing		
		Peak Hour	V/C or Delay	LOS
2	Central Avenue (NS) at SR 134 EB	AM	0.781	C
	Ramp/Sanchez Drive (EW)	PM	0.685	<u>B</u> C

Intersections		Existing		
		Peak Hour	V/C or Delay	LOS
3	Central Avenue (NS) at Pioneer Drive (EW)	AM	0.618	B
		PM	0.616	B
4	Central Avenue (NS) at Doran Street (EW)	AM	0.563	A
		PM	0.646	B
6	Orange Street (NS) at Doran Street (EW)	AM	0.484	A
		PM	0.582	A
7	Brand Boulevard (NS) at Doran Street (EW)	AM	0.682	B
		PM	0.737	C

Source: Kunzman Associates, Table 1.
NS – north/south bound; EW – east/west bound

The following revision has been made to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
4.10-12	These distributions reflect the Project traffic with a traffic signal at the intersection of San Fernando Road/Fernando Court.

The following addition has been made in response to the California Department of Transportation Comment Letter

<u>Page</u>	<u>Revision</u>
4.10-20	

Table 4.10-7
Existing Plus Project Level of Service

	Intersections	Existing			Existing plus Project			Significant Impact?
		Peak Hour	V/C or Delay	LOS	V/C or Delay	LOS	Change	
2	Central Avenue (NS) at SR 134 EB Ramp/Sanchez Drive (EW)	AM	0.781	C	0.772	C	-0.009	NO
		PM	0.685	<u>B</u>	0.685	B	0.000	NO
3	Central Avenue (NS) at Pioneer Drive (EW)	AM	0.618	B	0.618	B	0.000	NO
		PM	0.616	B	0.619	B	0.003	NO

	Intersections	Peak Hour	Existing		Existing plus Project			Significant Impact?
			V/C or Delay	LOS	V/C or Delay	LOS	Change	
4	Central Avenue (NS) at Doran Street (EW)	AM	0.563	A	0.564	A	0.001	NO
		PM	0.646	B	0.656	B	0.010	NO
6	Orange Street (NS) at Doran Street (EW)	AM	0.484	A	0.489	A	0.005	NO
		PM	0.582	A	0.562	A	-0.020	NO
7	Brand Boulevard (NS) at Doran Street (EW)	AM	0.682	B	0.682	B	0.000	NO
		PM	0.737	C	0.737	C	0.000	NO

NS – north/south bound; EW – east/west bound

Section 4.11.1 Water Service

The following revision has been made to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
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4.11.1-25	This amount represents an estimated net increase of 30,775,407 million gallons per year or 94.40 <u>61.35</u> afy for Sites A and B compared to existing uses.
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The following revision has been made to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
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4.11.1-25	However, even with the addition of 61.35 <u>94.4</u> afy of demand generated by the Project, there is ample supply to meet remaining City demand under normal weather conditions.
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The following revision has been made to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
-------------	-----------------

4.11.1-27	Combined with the net increase of 61.35 <u>94.4</u> afy generated by the Project, the cumulative amount demanded by the Project and related projects would generate an overall future water demand of approximately 741.35 afy
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Section 4.11.3 Solid Waste

The following revision has made been to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
4.11.3-8	The bill also mandated s <u>that</u> local jurisdictions to implement commercial recycling by July 1, 2012.

The following revision has made been to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
4.11.3-10	With implementation of the Project, the citywide projected solid waste disposal would be 143,973.5 tons per year and the City’s per capita disposal rate would be approximately 4.1 <u>4.01</u> PPD which would be under the 5.5 PPD population target for the City.

Section 5.0 Alternatives

The following revision has made been to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
5.0-1	These include short-term construction equipment emission impact; short-term construction equipment noise and groundborne vibration impacts during construction; long-term exterior noise along North Central Avenue, long-term recreation impacts, and cumulative <u>recreation, fire, police, and solid waste disposal</u> .

The following revision has made been to address a minor and necessary text edit.

<u>Page</u>	<u>Revision</u>
5.0-4	No short-term construction equipment emission impacts, short-term construction equipment noise and groundborne vibration impacts during construction, long-term exterior noise along North Central Avenue, long-term recreation impacts, and cumulative <u>recreation, fire, police and</u> solid waste disposal would occur as a result of this alternative.

Section 6.0 Effects Found Not to Be Significant

The following revision has made been to address a minor and necessary text edit submitted by the County of Los Angeles Public Works.

<u>Page</u>	<u>Revision</u>
6.0-9	Prior to issuance of any grading or building permits, the <u>City of Glendale County</u> must approve the SUSMP.

Appendix 4.2 Air Quality Calculations

The following revision has been made in response to the South Coast Air Quality Management District Comment Letter.

<u>Page</u>	<u>Revision</u>
11	For the maximum exposed residential receptor, results of the analysis predicted freeway emissions will produce PM ₁₀ concentrations of 8.24462 <u>5.86092</u> $\mu\text{g}/\text{m}^3$ and 3.10697 <u>2.25681</u> $\mu\text{g}/\text{m}^3$ for the 24-hour and annual averaging times. These values exceed the SCAQMD significance thresholds of 2.5 $\mu\text{g}/\text{m}^3$ and 1.0 $\mu\text{g}/\text{m}^3$, respectively. For PM _{2.5} , a maximum 24-hour average concentration of 3.20239 <u>2.26001</u> $\mu\text{g}/\text{m}^3$ was predicted. This value also exceeds <u>does not exceed</u> the identified significance threshold of 2.5 $\mu\text{g}/\text{m}^3$.

The maximum modeled 1-hour average concentration for CO of ~~0.50997~~ 0.34711 parts per million (ppm) (~~584.02~~ 397.50532 $\mu\text{g}/\text{m}^3$) when added to an existing background concentration of 3.0 ppm, will not cause an exceedance of the CAAQS of 20 ppm. For the 8-hour averaging time, the maximum predicted concentration of ~~0.31098~~ 0.21668 ppm, (~~356.13~~ 248.14504 $\mu\text{g}/\text{m}^3$) when added to an existing background level of 2.4 ppm, does not cause an exceedance of the CAAQS of 9 ppm.

For NO₂, a maximum one hour concentration of ~~0.04469~~ 0.03042 ppm (~~84.08507~~ 57.23445 $\mu\text{g}/\text{m}^3$) was predicted. This concentration, when added to a background concentration of 0.082 ppm, will not cause an exceedance of the CAAQS of 0.18 ppm.

7.0 CONCLUSION

For carcinogenic exposures, the summation of risk for the maximum exposed residential receptor totaled ~~1.5E-05~~ 1.1E-05 (~~1.5~~ 1.1 in one hundred thousand) for the 30 year and ~~4.6E-06~~ 3.4E-06 (~~4.6~~ 3.4 in one million) for the 9 year exposure scenarios. In comparison

to the threshold level referenced in Section 6.1, carcinogenic risks exceed the level posing no significant risk for the 30 year exposure scenario. Particulate emissions from trucks and related diesel fueled vehicles contribute to more than 75 percent of the identified risk value.